

Public Document Pack



BROMSGROVE DISTRICT COUNCIL

MEETING OF THE COUNCIL

WEDNESDAY 15TH JULY 2026

AT 6.00 P.M.

PARKSIDE SUITE - PARKSIDE

MEMBERS: Councillors J. Robinson (Chairman), B. Kumar (Vice-Chairman), S. Ammar, A. Bailes, R. Bailes, S. J. Baxter, J. Clarke, S. R. Colella, A. M. Dale, J. Elledge, S. M. Evans, D. J. A. Forsythe, E. M. S. Gray, C.A. Hotham, D. Hopkins, R. J. Hunter, H. J. Jones, R. E. Lambert, M. Marshall, K.J. May, P. M. McDonald, B. McEldowney, S. T. Nock, D. J. Nicholl, S. R. Peters, S. A. Robinson, J. D. Stanley, K. Taylor, H. D. N. Warren-Clarke, S. A. Webb and P. J. Whittaker

AGENDA

WELCOME

1. **To receive apologies for absence**
2. **Declarations of Interest**

To invite Councillors to declare any Disclosable Pecuniary Interests or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.

3. **To confirm the accuracy of the minutes of the meetings of the Council held on 25th February, 6th March and 20th May 2026 (Pages 7 - 68)**
4. **To receive any announcements from the Chairman and/or Head of Paid Service**
5. **To receive any announcements from the Leader**
6. **To receive comments, questions or petitions from members of the public**

A period of up to 15 minutes is allowed for members of the public to make a comment, ask questions or present petitions. Each member of the public has up to 3 minutes to do this. A councillor may also present a petition on behalf of a member of the public.

7. **Urgent Decisions**
8. **Request for the Appointment of Charter Trustees in the Structural Order for the new Unitary Authority (Pages 69 - 78)**
9. **Bromsgrove District Local Plan - Scoping Consultation (Pages 79 - 116)**
10. **Audit, Standards and Governance Committee Annual Report 2025-2026 (Pages 117 - 136)**
11. **Overview and Scrutiny Annual Report 2025 - 2026 (Pages 137 - 168)**
12. **To receive and consider a report from the Cabinet Member for Health and Wellbeing, Leisure and Culture (Pages 169 - 178)**

Members are asked to note that, following consideration of a Portfolio Holder Annual Report focused on Health and Wellbeing in the last municipal year, this annual report focuses on the Cabinet Member's remit of Leisure and Culture Services only.

Up to 30 minutes is allowed for this item; no longer than 10 minutes for presentation of the report and then up to 3 minutes for each question to be put and answered.

13. **Constitution Review Working Group - Recommendations Relating to the Content of the Council's Constitution**

Members are asked to note that a meeting of the Constitution Review Working Group is due to take place on 10th July 2026, after the publication of the agenda for this Council meeting. Any recommendations arising from this meeting will therefore be published in a supplementary pack for the Council meeting.

14. **Recommendations from the Cabinet** (Pages 179 - 180)

To consider the recommendations from the meeting of the Cabinet held on 17th June 2026.

15. **Background Information on the recommendations from the Cabinet**

(i) Shared Homelessness Strategy 2026-2031 (Pages 181 - 228)

(ii) Enforcement and Civil Penalty Policy (Pages 229 - 312)

16. **To note the minutes of the meeting of the Cabinet held on 17th June 2026** (Pages 313 - 336)

17. **Questions on Notice** (Pages 337 - 338)

To deal with any questions on notice from Members of the Council, in the order in which they have been received.

A period of up to 15 minutes is allocated for the asking and answering of questions. This may be extended at the discretion of the Chairman with the agreement of the majority of those present.

18. **Motions on Notice**

A period of up to one hour is allocated to consider the motions on notice. This may only be extended with the agreement of the Council.

19. **To consider any urgent business, details of which have been notified to the Assistant Director of Legal, Democratic and Procurement Services prior to the commencement of the meeting and which the Chairman, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting**

J. Leach
Chief Executive

Parkside
Market Street
BROMSGROVE
Worcestershire
B61 8DA

7th July 2026

If you have any queries on this Agenda please contact
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You are able to see and hear the livestream of the meeting from the Committee Pages of the website, alongside the agenda for the meeting.

If you have any questions regarding the agenda or attached papers, please do not hesitate to contact the officer named above.

Notes:

Although this is a public meeting, there are circumstances when Council might have to move into closed session to consider exempt or confidential information. For agenda items that are exempt, the public are excluded and for any such items the live stream will be suspended and that part of the meeting will not be recorded.



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- Meeting Agendas
- Meeting Minutes
- The Council's Constitution

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE COUNCIL

25TH FEBRUARY 2026, AT 6.00 P.M.

PARKSIDE SUITE - PARKSIDE

PRESENT: Councillors S. M. Evans (Chairman), B. Kumar (Vice-Chairman), S. Ammar, A. Bailes, R. Bailes, S. R. Colella, J. Elledge, D. J. A. Forsythe, E. M. S. Gray, C.A. Hotham, D. Hopkins, R. J. Hunter, R. E. Lambert, M. Marshall, K.J. May, P. M. McDonald, B. McEldowney, S. T. Nock, D. J. Nicholl, S. R. Peters, J. Robinson, S. A. Robinson, J. D. Stanley, K. Taylor, H. D. N. Warren-Clarke, S. A. Webb and P. J. Whittaker.

Officers: Mr. J. Leach, Mr. G. Revans, Ms. J. Lorraine, Mrs. C. Felton, Mrs. D. Goodall, Ms. N Cummings and Mrs. J. Gresham.

96\25 **TO RECEIVE APOLOGIES FOR ABSENCE**

Apologies for absence were received on behalf of Councillors S. J. Baxter, J. Clarke, A. M. Dale and H. J. Jones.

97\25 **DECLARATIONS OF INTEREST**

Members were reminded that all Councillors had been granted general dispensations by the Audit, Standards and Governance Committee earlier in the municipal year to take part in the debate and vote on the Council's budget and Council Tax.

Councillors S. Ammar and K. Taylor declared an interest in relation to agenda item 13(b) (Minute No. 176/25) – Notice of Motion – Production of a Business Prospectus, in that they both had businesses registered within the district of Bromsgrove.

98\25 **TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE COUNCIL HELD ON 3RD DECEMBER 2025**

The minutes of the meeting of Council held on 3rd December 2025 were submitted.

RESOLVED that the minutes of the meeting of Council held on 3rd December 2025 be approved as a true and correct record.

99\25

TO RECEIVE ANY ANNOUNCEMENTS FROM THE CHAIRMAN AND/OR HEAD OF PAID SERVICE

The Chairman congratulated two trustees of the Friends of St. John's Church who had raised over £500,000 for restoration works to the Church, as part of a programme of heritage activities. In addition, as part of efforts to commemorate the fourth year of the invasion of Ukraine, the Chairman had visited the Ukrainian Community in Bromsgrove and reaffirmed support for the Ukrainian Community within the District.

Council was also advised that a fundraising event was due to take place on 27th March 2026 which would be raising money for The Basement Project.

The Head of Paid Service confirmed that he had no announcements to make on this occasion.

100\25

TO RECEIVE ANY ANNOUNCEMENTS FROM THE LEADER

The Leader wished Councillor S. A. Robinson a happy birthday and updated Council that a letter was due to be sent to the Post Office, in opposition to the branch closing in Bromsgrove, on behalf of the Council.

101\25

TO RECEIVE COMMENTS, QUESTIONS OR PETITIONS FROM MEMBERS OF THE PUBLIC

There were no comments, questions or petitions from members of the public to be received by Council.

102\25

URGENT DECISIONS

Council was advised that no urgent decisions had been taken since the previous meeting.

103\25

RECOMMENDATIONS FROM THE CABINET FROM THE MEETING ON 7TH JANUARY AND 18TH FEBRUARY 2026

Council considered recommendations arising from the meetings of the Cabinet held on 7th January and 18th February 2026.

Pay Policy Statement 2026/27

The Leader advised that the Localism Act 2011 required English and Welsh local authorities to produce an annual Pay Policy Statement. The Act required the statement to be approved by Full Council and to be adopted by 31st March each year for the subsequent financial year.

The purpose of the statement was to provide transparency with regard to the Council's approach to setting the pay of its employees by identifying;

- the methods by which salaries of all employees were determined;
- the detail and level of remuneration of the most senior staff i.e. 'chief officers', as defined by the relevant legislation; and
- the Committee(s) responsible for ensuring the provisions set out in this statement were applied consistently throughout the Council and for recommending any amendments to the full Council.

The Council's pay and grading structure comprised grades 1 – 11. These were followed by grades for Managers, Assistant Director 1, Assistant Director 2, the Director of Worcestershire Regulatory Services (WRS), Executive Director, Deputy Chief Executive and then Chief Executive; all of which arose following the introduction of shared services between Bromsgrove District and Redditch Borough Councils.

Within each grade, there were a number of salary scale points. Up to and including grade 11 scale, at spinal column point 43, the Council used the nationally negotiated pay spine. Salary points above this were locally determined. All Council posts were allocated to a grade within this pay structure, based on the application of a Job Evaluation process. Posts at the level of Managers and above were evaluated by an external assessor using the Hay Job Evaluation scheme. As with the majority of authorities, the Council was committed to the Local Government Employers' national pay bargaining framework in respect of the national pay spine and annual cost of living increases negotiated with the trade unions.

All other pay related allowances were the subject of either nationally or locally negotiated rates. The Council was managed by a corporate leadership team who managed shared services across both Bromsgrove District and Redditch Borough Councils. All of the senior officer posts listed had been job evaluated on this basis, with the salary costs for these posts split equally between both Councils.

The policy also set out:

- The recruitment of Chief Officers
- Additions to the salaries of Chief Officers (Members were informed that there was no performance related pay)
- Termination payments
- Advertisement/publicity of posts

The documentation within the main agenda pack reflected the current year's pay structure agreed with the unions, as the national bargaining process for the current year had not yet concluded. The pay structure would be updated during the year to reflect the nationally agreed position once the national bargaining process had concluded and the new pay settlement was confirmed for April 2026 onwards.

As part of the national bargaining process the Council's lowest pay level would always meet the national minimum living wage levels, which were uplifted annually. The Council's national pay bargaining outcome, if increased, was usually applied in October and backdated to the beginning of the financial year. To ensure the lowest pay level always met the minimum living wage, an adjustment would be made at the beginning of the financial year to ensure that the Council remained compliant with its minimum living wage undertaking

It was noted that for some senior officer posts that were primarily based at Redditch Borough Council, the cost to Bromsgrove District Council was less than 50%. This reflected that these postholders predominantly undertook duties in the Borough of Redditch.

It was further noted that local government reorganisation was due to take place. The Leader set out that a £2.5m Risk and Resilience Budget, as well as £0.5m for years one and two of transition had been budgeted for. This reflected the Council's position that any staff impacted by local government reorganisation could be protected and hopefully obtain roles within the new local authority landscape.

The recommendation was proposed by Councillor K. May and seconded by Councillor S. T. Nock.

RESOLVED that

- 1) The Pay Policy Statement 2026/27 be approved;
- 2) The budget setting process confirm the Council's commitment to paying the higher level 'real living wage' for the coming financial year.

Bromsgrove Council Plan Update

The new Council Plan began development with sessions supported by the Local Government Association (LGA) in 2023. The priority areas identified during these sessions were further progressed in two workshops in Spring 2024, which brought together the Cabinet and Corporate Leadership Team to consolidate the learning and direction identified with the LGA, in combination with relevant data, into a new vision for the District, with distinct priorities and key objectives for the next four years. These were articulated in the plan as the overarching vision, which focused on the quality of life of local communities, and four new priorities:

- Economic Development
- Housing
- Environment
- Infrastructure (this priority underpins the ones above)

The Council Plan 2024/27 articulated the priorities for Bromsgrove District Council. Following approval by Cabinet in July 2024, the report

summarised progress from August 2024 up to December 2025, highlighting areas of work that had contributed to the delivery of priority objectives, projects and visions of the Council Plan.

Economic Development

Economic development was central to delivering the Council Plan, which focused on supporting businesses, creating opportunities for individuals, and strengthening communities.

The economically active population within the District was 83.9%, this was higher than both the West Midlands and Great Britain averages, with the economically inactive figure at 16.1%, considerably lower than the regional and national figures. The District was well positioned to take advantage of regional economic and employment opportunities.

Through the UK Shared Prosperity Fund (UKSPF), numerous grants had been awarded during the period, including Skills Boost Grants and match-funded Business Grants. The UKSPF had also provided funding for Enterprising Worcestershire, Careers Worcestershire, various employability schemes and the Growth Hub.

Support for growing businesses had also been provided through the Elevate programme. Elevate had two strands, one for all businesses, and Elevate Manufacturing which supported the manufacturing sector. These programmes supported businesses that had been trading for more than 3 years to develop their growth plans to scale-up their business.

The new Innovation Lighthouse programme had aimed to drive growth, competitiveness, and resilience in the local manufacturing sector. Participants had received bespoke, one-to-one support from the Warwick Manufacturing Group to develop new products or processes. They were also able to apply for a match-funded grant to deliver their project

Bromsgrove Town Centre had continued to develop, the market had been recognised nationally, and the Town Centre had continued to host events. Work was progressing around a Town Centre Framework, which aimed to support the development of a potential Business Improvement District (BID). Action had also been taken through the courts to close shops that were selling illegal tobacco and vape items.

Work continued to be delivered in line with the Bromsgrove Centres Strategy (2023–2026) and officers had provided support across all district centres as issues or challenges arose. This flexible approach ensured that businesses, community partners and parish councils received timely guidance, practical assistance and specialist expertise. Recent work had included supporting centre-based projects and public-realm improvements, such as the Rubery installation, and had facilitated local enhancements such as efforts to support the introduction of InPost lockers in Alvechurch. Officers had also continued to contribute to

planning and delivery for events and activities across the District, including major seasonal events such as the annual Christmas Lights programme, which provided a welcoming centre for residents, visitors and businesses.

There had also been a focus on improved parking, several of the District's car parks had received national Park Mark status, EV charging points had been installed and the annual Free Parking Day at Christmas time had continued to take place.

Housing

The Council Plan set out the Council's aspiration to create thriving and inclusive communities where everyone had access to safe, healthy, affordable, and environmentally responsible housing options.

Bromsgrove District Council, in partnership with Bromsgrove District Housing Trust (BDHT), had carried out research into the supply and demand for temporary accommodation and accommodation for those presenting as homeless. The resulting strategy had recommended that additional static temporary accommodation units were made available for homeless households. The Council had also collaborated with other Districts in Worcestershire to develop a Shared Homelessness Strategy for 2026-2031, in line with the Government's National Plan to End Homelessness.

The Council had also explored a range of options to support and increase the supply of accommodation. The authority had made a grant available from low-cost housing receipts for BDHT to purchase additional units of temporary accommodation and permanent social rented housing to support the homelessness service to move households more quickly out of temporary accommodation into permanent accommodation. In addition, the Council was also developing an Empty Homes Strategy to work with homeowners or landlords of empty properties to bring them back into use.

Support for the private rented sector had continued to develop, the Council had hosted a Private Sector Landlord Forum, which had been an opportunity to share best practice, get practical advice, and build stronger links between landlords and the Council. The Council had also been working with the Citizens Advice Bureau to develop a debt advice service to Private Tenants and homeowners. This new service ensured that where rent arrears and mortgage arrears were putting a home at risk, that households would be able to access support and advice to prevent homelessness. Bromsgrove District Council had been designated the lead constituent authority in Worcestershire for the Renters Rights Act 2025, to ensure consistency for renters and landlords across the county.

Environment

The Council Plan was committed to safeguarding the natural environment, and addressed biodiversity and climate change mitigation measures by supporting recycling and reducing waste.

Increased environmental enforcement had helped to protect the environment within the District and minimise pollution. Since Worcestershire Regulatory Services (WRS) had assumed control of the enviro-crime functions on behalf of Bromsgrove District and Redditch Borough Councils, 11 Community Protection Notices, 47 Fixed Penalty Notices (FPNs) and 1 section 215 notice had been served. The team was committed to educating businesses and the public on waste disposal methods, the reduction of fly-tipping and anticipated the serving of more FPNs when necessary.

The Council Plan also set out the steps the District had taken to comply with the Environment Act and means to reduce waste and increase recycling. The Council was compliant with dry recycling requirements of Simpler Recycling across Domestic and Commercial Waste Services. The Commercial Food Waste service had been implemented, and service expansion had been approved, as such, it was anticipated that additional clients would be secured. In addition, residential food waste collection was due to be implemented in 2026, with capital funding from Central Government.

The Council remained committed to improving the waste management systems; an essential bin-swap programme had been delivered, which had brought the Council in line with national standards. In 2025, Bromsgrove District Council had introduced HVO (Hydrotreated Vegetable Oil) as a renewable diesel alternative across its fleet and machinery; which had resulted in approximately 30% of HVO fuel usage across the fleet and the reduction of carbon output of operating services. The refuse fleet replacement programme had run until January 2026 for 15 new environmentally friendly and efficient vehicles, old trucks had been sold for parts and scrap, proceeds of which had gone back to the public purse.

Infrastructure

The infrastructure priority underpinned all the other priorities, as the other three could only be delivered with the right infrastructure in place.

The Local Plan provided a guide for how future homes, businesses, and infrastructure be developed across the District. As part of the Local Plan process, a consultation on the Draft Development Strategy had been undertaken for 16 weeks, from 30th June to 20th October 2025, based on the requirements of the Statement of Community Involvement, which identified who and how any consultation should take place. Social media posts had generated 785 engagements and 20 individual consultation events had been delivered across the District to allow residents to access an event near them, including centrally accessible events in Bromsgrove town centre. Approximately 8,000 responses had been

received via the various methods of engagement offered which were being reviewed by planning officers

Air quality within the District had continued to be of importance, Clean Air Day was marked each June and the Behavioural Change Officer and colleagues had visited schools across Bromsgrove to promote behavioural change. Several businesses and community groups in Hanover Street and Redditch Road had also been visited to raise awareness of air quality, promote the real time air quality monitoring portal and wider behavioural change. The Council's Air Quality Annual Status Report has been produced and submitted to the Department for Environment, Food and Rural Affairs. This had led to the revocation of air quality management areas in Redditch Road, Bromsgrove and Lickey End, Bromsgrove due to improved results from air quality monitoring.

Through working closely with employees across the organisation, the Council had identified the '4Ps' as a way of defining organisational culture and the aspirations of everyone who worked for Bromsgrove District Council, namely, Purpose, People, Pride and Performance.

From the comments and questions by members of Council, the following responses were made, and issues highlighted:

- The Leader undertook to provide further clarity related to centre-based projects, including the Rubery Installation to Members.
- The update table assessed progress against the four new priorities using a RAG rating, which determined if workstreams had been graded as either green, amber or red.
- It was noted that updates in relation to the Council Plan were captured using the Power BI dashboard, which linked information from service business plans, quarterly performance and project highlight reports into a single summary of the Council's progress which was updated in live time.
- Further information to support Members to access Power BI would be cascaded to group leaders.
- A cross-party group was due to be formed to progress the Town Centres Framework and Bromsgrove BID workstreams.
- The Bromsgrove 2040 Strategy had been implemented in part and remaining areas had been largely incorporated into the Council Plan 2024/27 to align with local government reorganisation timescales, with work to be further developed.
- The CCTV team had logged 348 CCTV incidents, completed 234 footage reviews and produced 81 videos for evidence. A new camera had also been installed at Bromsgrove bus station, following a successful "Hot Spot" Funding Application through West Mercia Police.
- The Leader undertook to provide further information detailing the Council's preparedness in relation to cyber security and Artificial Intelligence.

- There were no local authorities within Worcestershire which offered a residential food waste collection service, however this was due to be rolled out in Bromsgrove in 2026.
- The new Climate Change Strategy which had been developed during 2025, was due to appear before the Overview and Scrutiny Board, prior to adoption, in 2026.
- UK Shared Prosperity Funding was required to be allocated to recipients by 31st March 2026.
- Further updates would be provided to Council Members on a regular basis.

The recommendation was proposed by Councillor K. May and seconded by Councillor S. T. Nock.

RESOLVED that the Council Plan report and update table be noted.

Medium Term Financial Plan Stage 2 Budget Report 2026/2027 to 2028/2029 (including Capital Strategy, Investment Strategy and Treasury Management Strategy)

The Portfolio Holder for Finance presented the Stage Two of Bromsgrove District Council's Medium Term Financial Plan (MTFP) for 2026/27 to 2028/29 (including Capital Strategy, Investment Strategy and Treasury Management Strategy) for the consideration of Council.

The tabled report incorporated consultation feedback, settlement certainty, and fees and charges proposed alongside planned capital expenditure, a review of earmarked reserves and a proposed strategy relating to the flexible use of capital receipts.

For the municipal year of 2026/27, Council's determination and setting of the Council Tax was due to take place in two parts. Subject to approval of the Stage Two of the MTFP 2026/27 to 2028/29, it was proposed that Council would approve the final council tax setting position on 6th March 2026. This was to await the determination of external precepts, including the precept from Worcestershire County Council, and therefore enable council tax billing to be generated correctly.

The phased approach represented the Council's commitment to transparency within the changing and complex financial landscape affecting local authorities nationally.

It was highlighted that the proposed budget was balanced for the coming year and was forecast to remain so across the following two-year period of the MTFP, this was indicative of a forecast sustainable financial position across the medium term.

A forecast deficit position had been calculated for 2026/27 at £1.03m, with a further deficit of £399,000 predicted in year 2027/28.

In constructing the proposed budget base assumptions had been used to measure financial resilience and robustness of the Council's position.

Tax Base and Corporate Financing Assumptions were:

- That Council Tax would rise by the full 2.99% current allowable increase in year one (estimated increase of £300,000) and in all subsequent years. The tax base growth assumed an increase of 50 properties at £13,000, increasing to 50 properties in 2027/28 at increase values totalling £39,000.
- Business rates had previously assumed growth in the base based on the combined Herefordshire pooling figures. However, due to the Fairer Funding review no increase or growth had been built in as no pooling would take place and no growth was expected above the 10% levy applying to all Councils for 100% of baseline need growth. This was an area which was affected by late adjustments to the funding formula.
- Government Grants and New Homes Bonus were planned to be merged into larger ring-fenced grants to reduce complexity.
- Extended Producer Responsibility for packaging (EPR) of £1,766,905 was required to be spent on waste related services in line with the PACKUK guidance. The Council was reviewing how it could maximise use of the grant to relieve pressure on core budgets.
- Inflation was at 3.4% at December 2025.
- Fees and charges had been reviewed by individual service areas, with a maximum uplift of at least 2% in each area (where statutory caps applied) and an average of 3.8% across all areas.
- The Council was required to implement the new Waste Requirements from April 2026, in 2025/26 £950,000 was budgeted for this, to increase to £1m in 2027/28 on a continuing basis.
- The outcome of the Fairer Funding Review of additional support grant and retained business rates had resulted in a reduction of £2m phased in over three years, as detailed:
 - 2026/27: £500,000
 - 2027/28: £900,000
 - 2028/29: £2m
- Central Government had consolidated several grants together, these included the previous New Homes Bonus and the merger of Homelessness Prevention Grants, Rough Sleeping Initiatives and Temporary Accommodation Support.
- A contingency of £500,000 had been built into the MTFP for the following two years as part of earmarked reserves to support preparation for local government reorganisation. This figure was calculated following discussions with other District Councils and Worcestershire County Council, as well as costs related to estimations around the backfilling of posts.

The Chancellor's Statement had been announced on 26th November 2025, which was later than in previous years. It was a multi-year settlement covering 2026/27 to 2028/29 and was underpinned by the outcomes of the Fairer Funding Review which aimed to distribute resources more equitably based on assessed local need.

A suite of national policy changes had also been announced, whilst most had a limited direct financial impact upon the Council, these policy changes had formed the funding and policy context in which the MTFP must be managed. These policy change included:

- The high-value Property Surcharge from April 2028 required properties worth over £2m to pay an annual surcharge. However, as revenue was to be received by Central Government, this would not generate any additional income for the Council.
- District Councils retained the ability to increase council tax within referendum limits, although no additional local tax-raising powers had been introduced. This meant the ongoing financial stability of the Council was reliant on the maximisation of council tax increases, alongside savings and the maximisation of income.
- The lack of an additional core funding uplift beyond the rate of inflation had placed pressure on the Council's revenue budget, alongside pressures and demand upon services, which had reinforced the need for efficiency savings.
- Investments announced through the Government's 'Pride in Place' programme were targeted at areas of high deprivation and was available to local authorities following a competitive bidding process only.

The Council had entered the 2026/27 budget process sighted on a number of issues to address, these included:

- A deficit balance of £1.03m in the 2026/27 budget.
- An anticipated reduction in funding from the Fairer Funding Review of around £2m phased in over three years.
- The requirement to fund the higher than envisaged 2025/26 pay award at an additional cost of £28,000.
- The limitation on increases to council tax at 2.99% or £5, which was significantly lower than preceding and current rates of inflation.

Whilst it was acknowledged that the Council was facing significant pressures, this was not unique as all local authorities faced them. Stage 2 of the proposed budget had adjusted for the funding provided by Central Government and had reviewed a number of actions to close the gap. This review had resulted in the following actions having been undertaken:

- Work had been undertaken to maximise grants. There had been a large element of work around the Extended Producer Responsibility Grant.
- Work was currently being undertaken by Internal Audit around the Council's use of agency staff to provide assurance around ensuring agency work reflected the income provided for its delivery. Reporting mechanisms had also been put in place internally to review levels of agency staff on a regular basis.
- Finance Business Partners had worked closely with services to undertake reviews of services to identify potential savings opportunities without impacting on service delivery.
- A full review of vacant posts had been undertaken by the Senior Leadership Team in conjunction with HR.
- The review of fees and charges had been undertaken individually instead of through the application of a blanket percentage increase to maximise service income opportunities.
- A review had been undertaken to assess the appropriateness of further capitalisation of salaries.
- A full and in-depth review of earmarked reserves had been completed, this had resulted in the releasing of sums that had previously been set aside that were no longer required. This had enabled available funding to be re-aligned and directed to meet the Council's needs and priorities.
- The District continued to progress work to position services ready for Local Government Reorganisation. Several workstreams had been set up to begin planning for the new unitary based structure.
- Grant funding of £523,000 in 2026/27, £555,000 in 2027/28 and £596,000 in 2028/29 had been received for Homelessness, Rough Sleeping and Domestic Abuse.
- The Council was due to receive £73,000 in 2026/27 and 2027/28 relating to the Crisis and Resilience Fund. This provided funds to support residents facing financial hardship and built long-term financial resilience in communities.
- Additional costs relating to WRS were £25,000 on an ongoing basis relating to the Food Standards Agency. These pressures were salary related.
- Revenue Service pressures and savings had been considered. A total of £68,000 revenue bids had been included in 2026/27 as part of the MTFP, to reduce to £65,000 in future years. A further £566,000 of pressures had been identified in 2026/27, with £545,000 in 2027/28 and £742,000 in 2028/29. There were net savings of £622,000 in 2026/27, with £666,000 in 2027/28 and £690,000 in 2028/29.

The Budget Position 2026/27- 2028/29

Significant financial pressures upon the Council were increasing. At Quarter Two, the overall revenue financial position was a forecast £336,000 overspend position, although this was expected to reduce. Both Members and senior management had worked hard to mitigate

pressures during this period and initial projections for Quarter Three indicated that a more balanced year end position was likely.

The total savings identified for delivery in the 2025/26 year period were £1.213m, although £319,000 was yet to be delivered. Of this £1.213m, over £250,000 was made up of departmental efficiencies from the 2025/26 MTFP, £511,000 staff turnover rate (based on 5% of staffing budgets) and an ongoing savings budget pressure of £400,000.

Central Government had also announced that Elected Members would be eligible to rejoin the Local Government Pension Scheme. Whilst no date for this had been confirmed by the date of the meeting, this represented an additional financial pressure upon local authorities which would not be receiving extra funding to support this.

Fees and Charges

A full review had been undertaken of individual fees and charges to identify whether an additional level of charges could be applied. Whilst it was originally assumed that fees and charges would increase by 2%, reflecting a £100,000 increase, this had been revised following a robust forecasting exercise and would result in further income of £152,000 in 2026/27 and £153,000 from 2027/28 onwards.

Impact on Reserves

The Council held a General Fund balance of £13.38m and Earmarked Reserves of £11.27m.

It was recognised that the Council was required to safeguard financial sustainability in the medium and long term by continuing to set balanced budgets. Endeavours to achieve this could require targeted investment, efficiency measures and funding for redundancy costs as a last resort. These actions were a financial priority to enable the Council to adapt its operating model to remain viable, particularly in the context of a potential future North Worcestershire unitary arrangement.

A full review of reserves had been undertaken by the Assistant Director of Finance and Customer Services to ensure that the reserves were still required for their original purpose. This review had identified £5.944m of reserves that were no longer required for their original purpose and were to be transferred to the General Fund.

It was recommended that several new reserves should be created. The proposed reserves were as follows:

- £500,000 in 2026/27 and 2027/28 for work on Local Government Reorganisation. It was proposed that this would contribute towards the setting up of the new unitary council over the following two years.
- A £2.5m Risk and Resilience Reserve to cover the risks identified within the budget relating to recruitment drag, inflation cap, committed savings, and council tax collection rates.

- A £1.25m Community Investment Fund to enable agile investment to meet local community needs to support the council's priorities both directly and through partner organisations and community groups. Criteria for qualifying projects within the Community Investment Reserve funded programme was required to be aligned with the Council Plan and corporate priorities. The programme themes would be supported by a robust governance framework and were to be reported to Cabinet at its first meeting in the new financial year.
- £102,000 for air quality data via Particulate Monitoring.

It was further proposed that the reserves would be utilised to fund the extension of three posts until March 2027, to ensure the continuity of the Innovation Lighthouse Programme after 31st March 2026 and fund costs that were associated with the Tech One licence and AMS support.

Forecasts indicated that following the review of reserves, the Council would hold General Fund balances of £12.402m and Reserves of £12.245m.

Capital Programme

The projected carry forward positions as set out in the Quarter 3 Monitoring Report were £552,000 which would be carried forward to 2026/27.

The priority in capital terms was for the Council to spend its grant funding of £3.4m. The Council held the following:

- £2.5m Levelling Up Funding (LUF) to utilise on the Windsor Street Redevelopment.
- £0.8m Disabled Facilities Grant (DFG) funding.
- £0.1m Warm Homes Grant funding which was a Government initiative to improve the energy efficiency of properties.

Several capital bids were included within the budget. These amounted to £4.738m over 2026/27 and 2027/28. The key areas of investment were as follows:

- £0.801m Infrastructure
- £2.580m Buildings
- £1.000m Play Audits
- £0.170m Parks
- £0.020m Biodiversity
- £0.025m IT / Cyber
- £0.142m Other

The Capital Programme was closely linked to the Asset Strategy, Treasury Management Strategy, Minimum Revenue Provision Policy and Asset Investment Strategy. These strategies set out how the Council invested and borrowed funds and with which parties.

The opinion of the Section 151 Officer was that the risks contained in the 2026/27 proposed budget estimates had been minimised as far as was possible.

The Council had well established phased budget and council tax setting arrangements, this included ongoing scrutiny engagement via an established Finance and Budget Working Group, and Members were well sighted on and engaged with the progress of budget setting. These arrangements had been followed when compiling the 2026/27 budget and medium-term forecasts. In addition, an appropriately prudent approach had been taken to the estimates and assumptions used in the preparation of the MTFP. The MTFP set out the key estimates and assumptions used, including those related to future inflation, interest rates on investments and borrowing, Government funding, business rates and Council Tax.

In line with Section 25 of the Local Government Act 2003, the report of the Chief Financial Officer (CFO) set out the robustness of estimates included in the budget and the adequacy of the Council's reserves. The Chief Financial Officer's opinion was that the estimates were robust.

Attention was drawn to the following:

- There was significant uncertainty remaining in relation to the impact of local government reorganisation on the Council.
- There was significant inherent risk posed by the previous years' disclaimed financial statements, and continued progress of all matters pertaining to the section 24 recommendations was essential. This was an area which would require the Section 151 Officer, in consultation with the External Auditors, to agree their programme to ensure all recommendations were met.
- It was proposed that progress against the agreed programme would be overseen by the Audit, Standards and Governance Committee.
- Previously, the Council had not had a detailed plan in place to underpin financial sustainability in the event of significant unforeseen financial pressures. The Section 151 Officer had undertaken to address this, and the matter had been added to the Cabinet Work Programme for forward planning purposes and would be reported thereafter to Members.
- The Council's internal borrowing levels were indicative of an underlying borrowing requirement and the consequent impact on cashflow was compounded by the outstanding VAT recovery sums, which were being progressed with the support of an independent external tax specialist. Capital financing arrangements and the treasury policy were subject to a comprehensive independent review, this would be overseen by the Section 151 Officer and aimed to conclude by the end of quarter one of the following financial year.

- The Council was operating under no overall political control, as such, deliverance of the budget outcomes relied on continued political collaboration and cooperation.

Members in attendance noted that the Council set its budget as an integral part of a 3-year MTFP annually, with the final Council Tax Resolution due to be approved by Council in March 2026, following County Council determination of their precept.

The recommendations were proposed by Councillor S. T. Nock and seconded by Councillor K. May.

In accordance with the Local Authorities (Standing Orders) (England) (Amendment) Regulations 2014, the decision in respect of this matter was taken by holding a formal recorded vote and the results were as follows:

Members Voting FOR the Medium Term Financial Plan 2026/27 to 2028/29:

Councillors S. Ammar, A. Bailes, R. Bailes, S. R. Colella, J. Elledge, S. Evans, D. J. A. Forsythe, E. M. S. Gray, D. Hopkins, C. A. Hotham, R. J. Hunter, B. Kumar, R. E. Lambert, M. Marshall, K. J. May, P. M. McDonald, B. M. McEldowney, D. Nicholl, S. T. Nock, S. R. Peters, J. W. Robinson, S. A. Robinson J. D. Stanley, K. Taylor, H. D. N. Warren-Clarke, S. A. Webb and P. J. Whittaker. (27)

Members Voting AGAINST the Medium Term Financial Plan 2026/27 to 2028/29:

No Councillors (0).

Members voting to ABSTAIN on the Medium Term Financial Plan 2026/27 to 2028/29:

No Councillors (0).

Therefore, on being put to the vote, the recommendations were carried.

RESOLVED that

- 1) The Growth proposals of £67,639 in 2026/27, £64,719 in 2027/28 and £64,719 in 2028/29 be approved;
- 2) The Directorate Pressures of £565,655 in 2026/27, £545,295 and £741,514 in 2027/28 and 2028/2029, be approved;
- 3) The Savings proposals of £621,899 in 2026/27, £665,991 in 2027/2028 and £690,206 be approved;
- 4) The Capital Programme 2026/2027 to 2029/2030, including bids of £4.738m for new capital projects, be approved;

- 5) Earmarked Reserves of £12.245m be carried forward into 2026/2027, be approved;
- 6) The new allocations within the carried forward earmarked reserves as set out in paragraph 3.30, namely the creation of a new Financial Resilience Reserve of £2.5million, a Local Government Reorganisation Reserve of £1m, a Community Investment Fund of £1.250m and a reserve for Particulate Monitoring of £102k be approved;
- 7) Increases relating to Worcestershire Regulatory Services of £25k for the Food Standards Agency on an ongoing basis be approved;
- 8) The Flexible Use of Capital Receipts Strategy be approved;
- 9) The proposed Council Tax increase of 2.99% for the 2026/2027 be approved;
- 10) The updated fees and charges for Commercial Waste Services be approved for adoption in the 2026/2027 financial year.

Particulate Matter

The Portfolio Holder for Planning, Licensing and WRS presented the report.

Poor air quality was the largest environmental risk to public health in the UK. The mortality burden of air pollution in England was estimated to be between 26,000 and 38,000 a year, but many people suffered further avoidable chronic ill health as a result of it.

Particulate Matter (PM) was considered to be the most important air pollutant in terms of health impacts. Long-term exposure to PM increased mortality and morbidity from cardiovascular and respiratory diseases and caused cancer. Effects were amplified in vulnerable groups including young children, the elderly, and those suffering from breathing problems like asthma. It was also causally linked to dementia and declines in cognitive functions. Furthermore, there was growing evidence for associations with adverse birth outcomes and diabetes.

PM was not a single air pollutant, the composition of particles was very complex, comprising variable amounts of organic and inorganic chemicals derived from direct emissions or from atmospheric processing.

Following a successful bid to DEFRA's Air Quality Grant Scheme 2022-23, 26 low-cost Air Quality sensors had been installed across Worcestershire for a period of 3 years between January and May 2024.

Sensor locations had been chosen to maximise data capture within locations proximal to vulnerable communities, opportunities to encourage behavioural change and from a range of sources of air pollution including transport, solid fuel burning, industry and agriculture.

Three of the 26 sensors were installed in the Bromsgrove District area, and these were located at:

- Hanover Street, Bromsgrove
- Gunner Lane, Rubery
- Station Road, Hagley

WRS had been asked by the Council to prepare an options paper for additional PM Monitoring within the Bromsgrove District Council area.

Various options had been presented to the Council to enable the authority to measure total particulate matter mass concentration.

Cabinet had supported Option E which proposed maintaining current sensors and extended monitoring life for a further period of time, and a source apportionment study with the University of Birmingham on a mobile supersite. This would provide a unique insight into the PM profile in Worcestershire utilising state of the art air quality monitoring equipment and supported by academic expertise from the University of Birmingham.

Members in attendance endorsed the report and the proposals which had been tabled for consideration.

The recommendations were proposed by Councillor K. Taylor and seconded by Councillor K. May.

RESOLVED that

- 1) Additional monitoring of Particulate Matter (air pollution) be delivered as set out in Option E;
- 2) Subject to funding being identified and allocated accordingly, a further report be brought back to Cabinet once final costs had been identified;
- 3) Additional funding of £105,234.04 be added to the revenue budget for 2026/27.

(Following consideration of the above matter referred to at Minute No. 103/25 the meeting was adjourned between the hours of 8.11pm and 8.21pm hours.)

104\25

TO NOTE THE MINUTES OF THE MEETINGS OF THE CABINET HELD ON 18TH FEBRUARY 2026

The minutes from the Cabinet meeting held on 18th February 2026 were noted without comment.

105\25

RECOMMENDATIONS FROM THE AUDIT, STANDARDS AND GOVERNANCE COMMITTEE HELD ON 17TH FEBRUARY 2026

Council considered recommendations arising from the meeting of the Audit, Standards and Governance Committee held on 17th February 2026.

Capital Strategy 2026/27 Including Treasury Management Strategy

The Chair of the Audit, Standards and Governance Committee presented the report.

Members were advised that the meeting of the Audit, Standards and Governance Committee had taken place on 17th February 2026 at which recommendations had been agreed for the consideration of Council. Whilst there had not been sufficient time to prepare the minutes of that meeting in time for Council, recommendations had been tabled for Members' consideration.

Council was provided with an overview of capital expenditure, borrowing levels, prudential indicators and treasury risk management, and the impact upon the deliverance of public services.

The strategy set limits and indicators for risk management and the implications upon financial stability. It was noted that the strategy was set following consideration of the MTFP, the UK economic context and projected interest rates.

The treasury function managed cash flow into the local authority so that demands of expenditure could be met and resourced within the financial constraints in which the authority operated.

The CIPFA Code of Practice for Treasury Management in Public Services and the Prudential Code required local authorities to set the Treasury Management Strategy Statement and prudential indicators each financial year.

It was noted that the risk register had been considered by the Audit, Standards and Governance Committee, and had subsequently been updated to incorporate Development Control.

The recommendations were proposed by Councillor E. M. S. Gray and seconded by Councillor S. T. Nock.

RESOLVED that

- 1) The Capital Strategy be approved as an appropriate overarching strategy for the Council;
- 2) The Treasury Management Strategy 2026/27 and the associated Minimum Revenue Provision (MRP) be approved;
- 3) The Investment Strategy be approved.

106\25

QUESTIONS ON NOTICE

The Chairman advised that there had been six Questions on Notice submitted for consideration at this meeting.

At the start of this item the Chairman agreed that Councillor S. Robinson's question could be considered first at the meeting.

Question submitted by Councillor S. Robinson

"What is this Council doing to ensure that there is enough provision sought from developers for High School provision in Bromsgrove?"

The Leader responded by outlining that the Council was actively communicating with Worcestershire County Council as the local authority with the statutory responsibility for education provision. As part of the local plan consultation exercise, information relating to new educational provision had been provided by Worcestershire County Council. This response, alongside others, had been considered and had contributed to the draft local plan and the infrastructure development plan. These plans would be utilised to identify the scale and location of education provision necessary to support proposed development, and to meet demand. It was noted that County Councillors were aiming to propose a Task and Finish review of education provision through Worcestershire County Council's Overview and Scrutiny Board.

Councillor S. Robinson subsequently asked a supplementary question which sought further information regarding consultation with stakeholders and individual schools.

The Leader responded by explaining that school capacity varied by locality and that data was being collated, however assurances were made that appropriate consultation would take place where appropriate, should the proposed establishment of the Task and Finish Group at Worcestershire County Council be approved.

Question submitted by Councillor S. Ammar

This question was withdrawn.

Question submitted by Councillor J. Clarke

"Can you give an update on the food waste collection service and whether all the other district/borough/city councils in Worcestershire will be collecting their food waste this year?"

Council was advised that the response would be sent to all Members in writing.

Question submitted by Councillor R. Hunter

“Are you concerned that communities in the town of Bromsgrove will be left with poorer services if Bromsgrove is the only town, apart from Redditch, in Worcestershire without a town council following reorganisation?”

The Leader responded by outlining that the Council had supported a two-unitary proposal as part of the local government reorganisation. She acknowledged that the structure of local government was very important to the District's communities, particularly during a period of change. The English Devolution and Community Empowerment Bill placed a duty on local authorities to ensure effective governance at neighbourhood level, however did not prescribe specific structures, although indicated that neighbourhood area committees could form part of the future neighbourhood governance landscape. It was highlighted that any future governance arrangements should ensure that residents were heard and given opportunities to interact with Councillors at a place-based level, which should reflect natural population centres and local identity to encourage both localism and community participation.

Councillor R. Hunter subsequently asked a supplementary question which sought further information about the feasibility of a Community Governance Review.

The Leader responded by outlining that the Council was waiting for further information from Central Government, which would inform the best route forward for the future establishment of local government structures.

Question submitted by Councillor D. Nicholl

“Consultation on the draft local plan closed on October 20th, when can the public expect the results to be published?”

The Portfolio Holder for Planning, Licensing and WRS responded by outlining that over 8,000 responses had been received during the consultation. These responses were being collated at pace, and the interim findings would be presented to the Local Plan Cross Party Working Group in March 2026.

Councillor D. Nicholl subsequently asked a supplementary question, querying whether the Council was on schedule or at risk of not meeting deadlines. The Cabinet Member for Planning, Licensing and WRS

undertook to provide a response in writing, following a forthcoming meeting of the Local Plan Cross Party Working Group.

Question submitted by Councillor J. Robinson

“How soon do you think Churchfields Car Park could be brought back into use to help meet our ambition to increase footfall in the town centre?”

The Leader responded by acknowledging that the matter had been considered at a meeting of the Overview and Scrutiny Board on 10th February 2026. It was noted that costs related to remediation works were due to be provided for consideration at a future meeting of the Board. The Leader outlined that this matter was important for the local authority and that any timescales associated with the re-opening of the car park would be relayed to Members when further information was available.

Councillor J. Robinson subsequently asked a supplementary question which sought further information around timescales.

The Leader responded by outlining that further information and data around car park usage would most likely be available in the new municipal year.

107\25

MOTIONS ON NOTICE (TO FOLLOW)

The Chairman highlighted that two Motions on Notice had been submitted for consideration at the Council meeting.

Flooring in Social Housing

Councillor R. Hunter presented the following Motion on Notice for Members' consideration, in accordance with Procedure Rule 10.

“Council calls on Cabinet to ask officers to work with Bromsgrove District Housing Trust (BDHT) and central government to explore opportunities to end the practice of letting social housing without adequate flooring in Bromsgrove. This will include exploring whether BDC and its successor authority can be included in the national working group and pilot.”

In presenting the motion, Councillor R. Hunter noted that it was not a mandatory requirement for floor coverings to be provided as part of a tenancy agreement. It was highlighted that the Government had recently published an updated Decent Homes Standard which set out that a national working group and pilot would take place to consider the matter of funded flooring for social housing tenants.

The motion was proposed by Councillor R. Hunter and seconded by Councillor S. Ammar.

In seconding the motion, Councillor S. Ammar acknowledged that this matter was of importance to those living in the District with enhanced vulnerabilities and those with less than average disposable incomes.

The Cabinet Member for Planning, Licensing and WRS, outlined that a meeting was due to take place with BDHT, in consultation with Councillor R. Hunter to discuss the matter and provided assurances that he supported the motion in principle.

Members subsequently debated the motion and agreed that they supported the motion and outlined that finished flooring, in most circumstances, was necessary to provide a safe, comfortable and warm home.

In summing up Councillor R. Hunter thanked Members for supporting the motion and stressed the importance of a safe, secure and appropriate home to support the wellbeing of tenants.

RESOLVED that

“Council calls on Cabinet to ask officers to work with Bromsgrove District Housing Trust (BDHT) and central government to explore opportunities to end the practice of letting social housing without adequate flooring in Bromsgrove. This will include exploring whether BDC and its successor authority can be included in the national working group and pilot.”

Production of a Business Prospectus

Councillor S. Ammar presented the following Motion on Notice for Members' consideration, in accordance with Procedure Rule 10.

“Council understands the importance of attracting small and medium businesses and helping them grow and thrive in our area.

Council asks the Cabinet to consider producing a concise Business Prospectus bringing together useful information about available grants, incentives, guidance, and clear signposting of business opportunities in the north of the County. This will be a single market-ready document to be distributed across Bromsgrove and subject to agreement from Redditch Borough Council and Wyre Forest District Council across North Worcestershire. This document would be made available at Council offices and published digitally on the Council's website.

The Business Prospectus will act as a springboard to establish the new local authority as a champion of local small and medium businesses. It will make it easier to do business in our area, showcase credible

projects and the support available and demonstrate the Council's commitment to local economic development"

In presenting the motion, Councillor S. Ammar noted that the proposal would assist entrepreneurs in establishing a business and would support both the District's economy, and small and medium sized businesses.

The motion was proposed by Councillor S. Ammar and seconded by Councillor K. May.

In seconding the motion, Councillor K. May acknowledged that Bromsgrove had the highest number of start-ups within Worcestershire and that the consolidation of information in one place would support entrepreneurs and business leaders.

Members subsequently debated the motion and acknowledged the challenges facing small and medium businesses owners in the current economic climate and supported efforts to consolidate useful information in one place.

It was acknowledged that local businesses supported the local economy and boosted footfall on the high street and in other population centres within the District.

In summing up Councillor S. Ammar thanked Members for supporting the motion and paid tribute to local business owners.

RESOLVED that

"Council understands the importance of attracting small and medium businesses and helping them grow and thrive in our area.

Council asks the Cabinet to consider producing a concise Business Prospectus bringing together useful information about available grants, incentives, guidance, and clear signposting of business opportunities in the north of the County. This will be a single market-ready document to be distributed across Bromsgrove and subject to agreement from Redditch Borough Council and Wyre Forest District Council across North Worcestershire. This document would be made available at Council offices and published digitally on the Council's website.

The Business Prospectus will act as a springboard to establish the new local authority as a champion of local small and medium businesses. It will make it easier to do business in our area, showcase credible projects and the support available and demonstrate the Council's commitment to local economic development"

108\25

TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR OF LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIRMAN,

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**BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF
SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT
MEETING**

There was no urgent business for consideration on this occasion.

The meeting closed at 9.37 p.m.

Chairman

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE COUNCIL

6TH MARCH 2026, AT 6.00 P.M.

PARKSIDE SUITE - PARKSIDE

PRESENT: Councillors S. M. Evans (Chairman), B. Kumar (Vice-Chairman), S. Ammar, A. Bailes, R. Bailes, J. Clarke, S. R. Colella, A. M. Dale, D. J. A. Forsythe, E. M. S. Gray, C.A. Hotham, D. Hopkins, R. J. Hunter, H. J. Jones, R. E. Lambert, M. Marshall, K.J. May, B. McEldowney, S. T. Nock, D. J. Nicholl, S. R. Peters, J. Robinson, S. A. Robinson, K. Taylor, H. D. N. Warren-Clarke, S. A. Webb and P. J. Whittaker

Officers: Mr J. Leach, Ms. J. Lorraine, Mrs. C. Felton, D Goodall and Mrs J. Gresham

109\25 **TO RECEIVE APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors S. Baxter, J. Elledge, P. McDonald and J. Stanley.

110\25 **DECLARATIONS OF INTEREST**

The Chairman explained that at a meeting held in July 2025 the Audit, Standards and Governance Committee granted a dispensation to all Councillors that they be permitted to speak and vote on Council Tax matters.

There were no Declarations of Interest.

111\25 **RECOMMENDATIONS FROM THE CABINET**

Council Tax Resolutions 2026 – 2027

The Cabinet Member for Finance presented the Council Tax Resolutions report for Council's consideration.

In doing so Members were provided with an overview of the requirements, context, and key figures relating to the Council Tax Resolution for the 2026/27 financial year, including the council tax base, precept impacts, and known external factors influencing the overall bill.

The formal calculation of the Council Tax Base for 2026/27, which must be approved annually in accordance with statutory regulations was outlined as follows:

- The calculated tax base for the whole District for 2026/27 was 38,409.8 Band D equivalent properties.
- The figure was based on data as of 30th November 2025, and adjusted for dwelling changes, discounts, exemptions, and a 1 per cent non-collection allowance.
- This tax base formed the foundation for setting the District Council's own Council Tax requirement.

Members were reminded that for the financial year 2025-2026, the District Council's Band D properties charge was £257.48. The District Council element for financial year 2026-2027 charge for Band D properties was set at £265.18. This was an increase of 2.99 per cent.

This below inflation increase and taking into account the Medium-Term Financial Plan 2026-27 including Treasury Management Strategy, Capital Strategy and Investment Strategy which was agreed by Members on 25th February 2026 would provide service resilience for the Council.

It was noted that there was a typographical error within Appendix 3 – Parish Precepts to the report. However, an updated table had been provided for Members' consideration at this meeting. The Cabinet Member for Finance reported that this was a very useful document in order to compare the precept amounts across each Parish Council.

Parish Councils set their precepts separately and it was noted there was an average 8.77 per cent increase across Parish Council for the financial year 2026-2027 and the total Parish Council precepts which amounted to £1.496million. The individual property Band amounts could be found in Appendix 3 as detailed above.

The overall Council Tax bill included several external precepts as follows:

- West Mercia Police & Crime Commissioner - The precept for 2026-2027 was set to rise by 5.15 per cent, an increase for Band D properties to £306.50.
- Worcestershire County Council - The County Council's 2026-2027 budget included an 8.98 per cent increase, taking the charge to £1,760.80 for Band D properties.
- Hereford & Worcester Fire & Rescue Service - The 2026-2027 figure was set to rise by 4.89 per cent, an increase for Band D properties to £107.22

The Council remained committed to financial stability, recognising the tax base calculation was a core part of the Medium-Term Financial Plan 2026-27 including Treasury Management Strategy, Capital Strategy and Investment Strategy. Members were informed that Council Tax bills would be issued to residents accordingly.

Following the presentation of the report there were several questions from members. These were as follows:

- If any budgetary cuts in a specific service had occurred area as a result of the Budget setting process would grant funding received from the Government be impacted and allocated proportionally – There was a brief discussion on this matter, however it was suggested that if any further clarification was required this could be discussed following the meeting.
- The allocated percentage of the collection fund for Hereford Fire and Worcester Fire and Rescue Service – the information contained within the report stated that getting Hereford Fire and Worcester Fire and Rescue Service would be allocated at 3.3 per cent of their precept. However, all other precepting Authorities would only receive 1.1 per cent of their precept. Members queried why this was not split evenly – it was noted that surpluses and deficits were not forecast and was based on figures from the previous year. Further information would be provided to Members following the meeting.

The recommendations were proposed by Councillor S. Nock and seconded by Councillor K. May.

In accordance with the Local Authorities (Standing Orders) (England) (Amendment) Regulations 2014, the decision on the Council Tax Resolutions was taken by a formal recorded vote process.

Members voting FOR the Council Tax Resolutions 2026/27 Councillors S. Ammar, A. Bailes, R. Bailes, J. Clarke, S. Colella, A. Dale, D. Forsythe, E. Gray, D. Hopkins, C. Hotham, R. Hunter, H. Jones, B. Kumar, R. Lambert, M. Marshall, K. May, B. McEldowney, D. Nicholl, S. Nock, S. Peters, J. Robinson, S. Robinson, K. Taylor, H. Warren-Clarke, S. Webb, P. Whittaker and S. Evans (27).

Members voting AGAINST the Council Tax Resolutions 2026/27

No Councillors (0).

Members voting to ABSTAIN on the Council Tax resolutions 2026/27

No councillors (0).

Therefore, on being put to the vote, the recommendations were carried.

RECOMMENDED that

1.2.1 The calculation for the council tax requirement for the council's own purposes for 2026/27 (excluding parish precepts) as **£10,185,510.76**

1.2.2 That the following amounts be calculated for the year 2026/27 in accordance with sections 31 to 36 of the Act:

- a) £43,803,037.52 being the aggregate of the amounts which the council estimates for the items set out in section 31A(2) of the Act (taking into account all precepts issued to it by Parish Councils) (i.e., gross expenditure)
- b) £32,121,303.24 being the aggregate of the amounts which the council estimates for the items set out in section 31A(3) of the Act. (i.e gross income).
- c) £11,681,734.28 being the amount by which the aggregate of 1.2.2(a) above exceeds the aggregate of 1.2.2(b) above, calculated by the council, in accordance with section 31A(4) of the Act, as its council tax requirement for the year. (Item R in the formula in section 31B of the Act).
- d) £304.13 being the amount at 1.2.2(c) above (Item R), all divided by Item T (1.1(a) above), calculated by the council, in accordance with section 31B of the Act, as the basic amount of its council tax for the year (including parish precepts).
- e) £1,496,223.52 being the aggregate amount of all special items (parish precepts) referred to in section 34(1) of the Act (as per the attached **schedule 3**)
- f) £265.18 being the amount at 1.2.2(d) above less the result given by dividing the amount at 1.2.2(e) above by Item T (1.1 (a) above), calculated by the council, in accordance with section 34(2) of the Act, as the basic amount of its council tax for the year for dwellings in those parts of its area to which no parish precept relates.
- g) The amounts shown in column 4 of **schedule 1**. These are the basic amount of council tax for the year for dwellings in those parts of the council's area shown in column 1 of the schedule respectively to which special items relate, calculated

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by the council in accordance with section 34(3) of the Act. (District and parish combined at band D).

- h) The amounts shown in columns 7 to 14 of **schedule 1** being the amount given by multiplying the amount at 1.2.2(g) above by the number which, in the proportion set out in section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number of dwellings listed in valuation band D, calculated by the council, in accordance with section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

1.2.3 It is to be noted that for the year 2026/27, Worcestershire County Council, Police and Crime Commissioner for West Mercia, and Hereford and Worcester Fire Authority have issued precepts to the council in accordance with section 40 of the Act for each category of dwelling in the council's area as indicated below:

	Valuation Bands							
	A	B	C	D	E	F	G	H
	£	£	£	£	£	£	£	£
Worcestershire County Council	1,173.87	1,369.51	1,565.16	1,760.80	2,152.09	2,543.38	2,943.67	3,521.60
Police and Crime Commissioner for West Mercia	204.33	238.39	272.44	306.50	374.61	442.72	510.83	613.00
Hereford and Worcester Fire Authority	71.48	83.39	95.31	107.22	131.05	154.87	178.70	214.44

1.2.4 That having calculated the aggregate in each case of the amounts at 1.2.2(h) and 1.2.3 above, that Bromsgrove District Council in accordance with sections 30 and 36 of the Local Government Finance Act 1992 hereby sets the amounts shown in **schedule 2** as the amounts of council tax for 2026/27 for each part of its area and for each of the categories of dwellings.

1.2.5 The Interim Director of Finance be authorised to make payments under section 90(2) of the Local Government Finance Act 1988 from the collection fund by ten equal instalments between April 2026 to March 2027 as detailed below

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Council
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	Precept (£)	Surplus/Deficit on Collection Fund (£)	Total to Pay (£)
Worcestershire County Council	67,631,975.84	76,853.64	67,708,829.48
Police and Crime Commissioner for West Mercia	11,772,603.70	13,865.63	11,786,469.33
Hereford and Worcester Fire and Rescue Authority*	4,118,298.75	13,950.93*	4,132,249.68*

1.2.6 The Interim Director of Finance by authorised to make transfers under section 97 of the Local Government Finance Act 1988 from the collection fund to the general fund the sum of £11,695,685.21 being the council's own demand on the collection fund (£10,185,510.76) and parish precepts (£1,496,223.52) and the distribution of the surplus/deficit on the collection fund (£13,950.93).

1.2.7 That the Interim Director of Finance by authorised to make payments from the general fund to parish councils the sums listed on **Schedule 3** by two equal instalments on 1st April 2026 and 1st October 2026 in respect of the precept levied on the council.

1.2.8 That the above resolutions to be signed by the Chief Executive for use in legal proceedings in the Magistrates' Court for the recovery of unpaid council taxes.

1.2.9 Notices of the making of the said council taxes signed by the Chief Executive are given by advertisement in the local press under section 38(2) of the Local Government Finance Act 1992.

**Following this meeting an error had been identified in resolution 1.2.5 which referenced a table that had included an error. A Decision was made under Urgency Procedure Rules on 18th March 2026, and this matter had now been resolved. The correct table read as follows:*

	Precept (£)	Surplus/Deficit on Collection Fund (£)	Total to Pay (£)
Worcestershire County Council	67,631,975.84	76,853.64	67,708,829.48
Police and Crime Commissioner for West Mercia	11,772,603.70	13,865.63	11,786,469.33
Hereford and Worcester Fire and Rescue Authority	4,118,298.75	4,862.25	4,123,161.00

Agenda Item 3

Council
6th March 2026

112\25

TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR OF LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIRMAN, BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT MEETING

There was no Urgent Business on this occasion.

The meeting closed at 6.26 p.m.

Chairman

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE COUNCIL

20TH MAY 2026, AT 6.00 P.M.

PARKSIDE SUITE - PARKSIDE

PRESENT: Councillors J. Robinson (Chairman), B. Kumar (Vice-Chairman), S. Ammar, S. J. Baxter, S. R. Colella, A. M. Dale, S. M. Evans, E. M. S. Gray, C.A. Hotham, D. Hopkins, R. J. Hunter, R. E. Lambert, M. Marshall, K.J. May, P. M. McDonald, B. McEldowney, S. T. Nock, D. J. Nicholl, S. R. Peters, S. A. Robinson, J. D. Stanley, K. Taylor, H. D. N. Warren-Clarke, S. A. Webb and P. J. Whittaker

Officers: Mr J. Leach, Mr. G. Revans, Mr. J. Walton, Mrs. C. Felton, Mr. M. Dunphy and Mrs. J. Bayley-Hill

1\26

ELECTION OF CHAIRMAN 2026/27

A nomination was received on behalf of Councillor J. Robinson to be elected as Chairman of the Council for the 2026/27 municipal year. The nomination was proposed by Councillor R. Hunter and seconded by Councillor S. Ammar.

A further nomination was received on behalf of Councillor R. Bailes to be elected as Chairman of the Council for the 2026/27 municipal year. The nomination was proposed by Councillor C. Hotham and seconded by Councillor S. Colella.

On being put to the vote, Councillor J. Robinson's appointment as Chairman of the Council for the 2026/27 municipal year was carried.

RESOLVED that Councillor J. Robinson be elected as Chairman of the Council for the ensuing municipal year.

Councillor J. Robinson signed the Declaration of Acceptance of Office, thanked Members of the Council and stated that it was an honour to be elected to the Office of Chairman for the 2026/27 municipal year.

2\26

ELECTION OF VICE CHAIRMAN 2026/27

A nomination was received for Councillor B. Kumar to be elected as Vice Chairman of the Council for the 2026/27 municipal year. The nomination was proposed by Councillor K. May and seconded by Councillor S. Baxter.

A further nomination was received for Councillor R. Bailes to be elected as Vice Chairman of the Council for the 2026/27 municipal year. The nomination was proposed by Councillor C. Hotham and seconded by Councillor S. Coella.

On being put to the vote, Councillor B. Kumar's appointment as Vice Chairman of the Council for the 2026/27 municipal year was carried.

RESOLVED that Councillor B. Kumar be elected Vice Chairman of the Council for the ensuing municipal year.

Councillor Kumar signed the Declaration of Acceptance of Office and thanked Members of the Council for electing him to the office of Vice Chairman.

3\26

VOTE OF THANKS TO RETIRING OFFICE HOLDERS

The Chairman proposed a vote of thanks to Councillor S. Evans for his time serving as Chairman of Bromsgrove District Council. This was seconded by Councillor S. Baxter.

RESOLVED that the thanks of the Council be tendered to Councillor S. Evans for services rendered as Chairman of the Council in 2025/26.

4\26

TO RECEIVE APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of Councillors A. Bailes, R. Bailes, J. Clarke, J. Elledge, D. Forsythe and H. Jones.

5\26

DECLARATIONS OF INTEREST

Councillor C. Hotham declared an other disclosable interest in Minute Item No. 15/26 – Cabinet Recommendations in respect of the Empty Homes Strategy. Members were advised that a relative of Councillor Hotham was renovating a property located in the District and whilst this work was taking place the building was empty. He remained present for the debate in respect of this item and voted thereon.

During consideration of Minute Item 15/26 – Cabinet Recommendations in respect of the Renters Rights Act 2025, Councillor S. Ammar declared an other disclosable interest in her capacity as a landlord of a property located outside the District. She remained present for the debate in respect of this matter and voted thereon.

6\26

TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE COUNCIL HELD ON 21ST JANUARY 2026

The minutes of the meeting of Council held on 21st January 2026 were submitted.

During consideration of this item, a Member suggested that previous minutes had stated the location of the meeting and a request was made for this to be included in future iterations of the minutes.

RESOLVED that the minutes of the meeting of Council held on 21st January 2026 be approved as a true and correct record.

7\26

TO RECEIVE ANY ANNOUNCEMENTS FROM THE CHAIRMAN AND/OR HEAD OF PAID SERVICE

The Chairman advised that his consort for the year would be his wife, Councillor S. Robinson. Council was informed that the Chairman intended to confirm the chairty(ies) he would be supporting at the following meeting of Council.

The Head of Paid Service confirmed that he had no announcements to make on this occasion.

8\26

TO RECEIVE ANY ANNOUNCEMENTS FROM THE LEADER

The Leader confirmed the following appointments to Cabinet and Portfolios that had been allocated to each Cabinet Member:

- Councillor K. May – Leader of the Council and Cabinet Member for Strategic Partnerships, Economic Development and Enabling
- Councillor S. Baxter – Deputy Leader of the Council and Cabinet Member for Planning and Strategic Housing
- Councillor S. Nock – Cabinet Member for Finance
- Councillor K. Taylor – Cabinet Member for Local Government Reorganisation, WRS and Climate Change
- Councillor S. Webb – Cabinet Member for Health and Wellbeing, Leisure and Culture
- Councillor P. Whittaker – Cabinet Member for Environmental Services and Community Safety

9\26

TO RECEIVE COMMENTS, QUESTIONS OR PETITIONS FROM MEMBERS OF THE PUBLIC

The Chairman confirmed that no questions, comments or petitions had been submitted in time for consideration at the meeting.

10\26

URGENT DECISIONS

The Chairman advised that two urgent decisions had been taken since the previous meeting of Council on the following matters:

- Council Tax Resolutions
- Appointment of a Section 151 Officer

As these decisions had already been taken, they were not due to be debated at the meeting.

During consideration of this item, Members welcomed reference to the names of the Councillors who had been consulted on the urgent decisions although it was noted that a spelling error had occurred in the recording of Councillor P. McDonald's surname.

11\26

CONSTITUTION REVIEW

The Leader presented a report detailing proposed changes to the Council's constitution, including the Scheme of Delegations, for Members' consideration.

Council was informed that there was a requirement, detailed in the constitution, for Members to review the Scheme of Delegations at the Annual Council meeting. This included proposed updates to the Scheme of Delegations to reflect changes to job titles and legislation since the last Annual Council meeting. There were some additional delegations proposed for Community Services, in relation to CCTV and Lifeline, climate change and the operation of BURT and Shopmobility services. Many of the changes had been considered and proposed at a meeting of the Constitution Review Working Group held on 28th April 2026.

The report also detailed proposed changes to the Council's Contract Procedure Rules. The Council's existing Contract Procedure Rules had been adopted in 2016 and were set in EU procurement law, (based on the Public Contract Regulations 2015). Things had moved on since then, with the implementation of the Procurement Act 2023 into UK law in 2025. The Council's Contract Procedure Rules were being updated as a consequence of this. The report set out the key changes that had been made to the rules. These changes were all to ensure compliance with the Procurement Act. The updated rules had already been signed off by the Senior Leadership Team (SLT) and the Constitution Review Working Group.

The report contained information about Members' eligibility to join the Local Government Pension Scheme (LGPS). This eligibility for Members was reintroduced by the Government in May 2026. Participation in the LGPS was on an opt in basis, so any Members who were interested in joining the LGPS were advised to contact the Financial Services team. The Government's announcement on Members' eligibility to join the LGPS and the start date for joining had been issued after the Council had approved the Scheme of Members' Allowances 2026/27 and the Council therefore needed to update the scheme to reflect this entitlement.

Council was asked to note that there was a proposal for the size of the Shareholders Committee to increase from 4 to 5 members. This would make it easier to convene meetings of the Committee during the year.

Finally, Members were asked to note that an additional recommendation had been proposed since the publication of the main agenda pack. This requested changes to the Committee Terms of Reference and Procedure Rules for the Audit, Standards and Governance Committee to reflect the role of the Committee in consideration of the Statement of Accounts and Treasury Management Strategy.

After the report had been presented, Members discussed the titles that had been used in the Scheme of Delegations and Finance Procedure Rules to refer to the Section 151 Officer and Chief Finance Officer and the reason why both titles had been used in addition to the job title of Director of Finance. Members were informed that Director of Finance was the Officer's official job title at the Council but he was the Council's Section 151 Officer, which was a statutory post often referred to within Local Government as Chief Finance Officer. As this was the Director of Finance's first Council meeting since he commenced employment with the Council, Members welcomed him to the meeting.

Consideration was given to the content of the Scheme of Delegations, specifically the reference to Section 106 monies and questions were raised about the reasons why separate figures of £15,000, £50,000 and £200,000 were referred to in different places. Officers clarified that the limit should have been recorded as £200,000 to reflect the Council's key decision threshold and this typographical error would be corrected after the Annual Council meeting.

The recommendations were proposed by Councillor K. May and seconded by Councillor S. Baxter.

RESOLVED that

- 1) The current version of the Scheme of Delegations be adopted;**
- 2) The proposed new delegations for Community Services be approved;**
- 3) The updated Contract Procedure Rules be approved;**
- 4) The updated Financial Procedure Rules be approved;**
- 5) An update to the Scheme of Members' Allowances 2026/27, to incorporate reference to Members' eligibility to join the Local Government Pension Scheme be approved; and**
- 6) The Committee Terms of Reference for the Shareholders Committee be updated to reflect the proposed membership of 5 rather than 4 members on the Committee.**

12\26

MOTIONS ON NOTICE - MOTION 1

Members were advised that the first Motion on Notice that had been submitted for consideration at this meeting would be debated at this stage. This would ensure that, should the Motion be approved, the action that would be required as a consequence could be implemented at the Annual Council meeting during consideration of the Appointments to Committees 2026/27 (Including Political Balance) report.

The following Motion on Notice was presented by Councillor D. Nicholl for Council's consideration:

“Council resolves to amend the constitution with immediate effect so that Chairs and Vice Chairs of the Council’s formal committees for each municipal year are elected at the Annual Meeting of the Council.”

The Motion was proposed by Councillor Nicholl and seconded by Councillor S. Robinson.

In proposing the Motion, Councillor Nicholl explained that other Councils in Worcestershire appointed the Chairmen and Vice Chairmen of their Committees at their Annual Council meetings. He expressed the view that this approach could be considered more transparent than appointments made at the first meeting of a Committee in the municipal year, which was the current arrangement at Bromsgrove District Council. He also expressed the opinion that this approach might ensure that the number of chairing roles allocated per political group at the authority reflected a balanced position.

In seconding the Motion, Councillor S. Robinson commented that contrary to concerns expressed by some Members, she did not feel that the Motion was proposing a top-down approach to appointments of Chairmen and Vice Chairmen of Committees. The political balance would continue to apply to relevant Committees and only Members nominated to sit on those Committees by their group leaders, in accordance with the political balance figures, would be eligible to be nominated to be the Chairmen or Vice Chairmen of those Committees. Members were also asked to note that the approach proposed in the Motion would help to ensure that all or at least a majority of Members would be in support of the appointments agreed at the Annual Council meeting.

Members discussed the proposed Motion in detail and in doing so commented on the following:

- The need for clarity as to whether every Member of Council would be provided with an opportunity to vote on the appointments of Chairmen and Vice Chairmen to Committees or just the members of those Committees. Members were informed that the intention was to provide all Members with an opportunity to vote at the Annual Council meeting on these appointments.

- The arrangement whereby Chairmen and Vice Chairmen of Committees were currently appointed by their colleagues at the first meeting of the Committee in the municipal year. The suggestion was made that this helped to demonstrate that the Councillors appointed to these positions had the confidence of their colleagues on the relevant Committee.
- The historic arrangements for appointing Chairmen and Vice Chairmen to Committees, which had reflected the approach proposed in the Motion. It was suggested that a decision had been made to change this arrangement some years ago due to concerns about Council imposing Chairmen and Vice Chairmen on Committees.
- The extent to which a Chairman and a Vice Chairman could be considered to be more accountable to the members of a Committee if they were appointed to chair that Committee by those Members.
- The need for the most appropriate Councillors with relevant skills to be appointed to Chairmen and Vice Chairmen positions of Committees.
- The value of political groups working together whilst the Council was under no overall control to identify which Members should be appointed as the Chairmen and Vice Chairmen of particular Committees.
- The need for the Overview and Scrutiny Board and Audit, Standards and Governance Committee to be independent from the Cabinet and the extent to which it would be appropriate for Cabinet Members to engage at the Annual Council meeting in appointing the Chairmen and Vice Chairmen of these Committees.
- The extent to which Cabinet Members could be excluded from voting on the appointments of the Chairmen and Vice Chairmen of the Overview and Scrutiny Board and Audit, Standards and Governance Committee if this was determined at the Annual Council meeting.
- The constitutional changes arising from the proposals detailed in the Motion and whether Committee Members would have the power to overturn the appointment once determined at the Annual Council meeting. Members were informed that if the authority decided that appointments of Chairmen and Vice Chairmen of Committees should be a Council function Committees would not have the power to overturn decisions on appointments made at the Annual Council meeting.
- The appointment of Chairmen and Vice Chairmen to Committees at Annual Council meetings at other local authorities under No Overall Control. Members commented that this included Redditch Borough Council and it was noted that as a consequence, due to shared services, Council staff would be familiar with the arrangements that needed to apply.
- The extent to which appointment of Chairmen and Vice Chairmen of Committees at the Annual Council meeting could be viewed as

political in nature and whether this was appropriate for quasi-judicial Committees.

- The extent to which the distribution of Chairmen and Vice Chairmen's appointments to Committees at the authority in recent years was a fair reflection of the political balance at the Council.
- The live streaming of full Council meetings and the extent to which appointments of Committee Chairmen and Vice Chairmen made at the Annual Council meeting would be more transparent to the public than at Committee meetings that were not live streamed.
- The fact that meetings of the formal Committees, such as the Overview and Scrutiny Board and Licensing Committee, were open to the public to attend to observe proceedings.
- The previous discussions Members had held about specific Chairman and Vice Chairman roles and the extent to which these discussions had been productive.

On being put to the vote, the Motion was lost.

13\26

APPOINTMENTS TO COMMITTEES 2026/27 (INCLUDING POLITICAL BALANCE)

The Leader presented a report concerning appointments to Committees for 2026/27, which included reference to the authority's political balance.

Council was informed that there was a legal and constitutional requirement for the political balance at the Council to be reviewed at the Annual Council meeting as well as each time there was a change to the political balance. The report detailed the political balance of the Council as of May 2026. The terms of reference for each of the Committees had also been provided for Members' consideration.

Prior to the Annual Council meeting, group leaders had been consulted on the political balance figures in order to achieve a proposed balanced position. Group leaders had also been consulted about their group's nominations to the Committees that formed part of the political balance and the Council's website would be updated accordingly after the meeting.

The recommendations were proposed by Councillor K. May and seconded by Councillor S. Baxter.

RESOLVED that

- 1) **for the ensuring Municipal Year, the Committees be appointed and that the representation of the different political groups on the Council on those Committees be as set out in Appendix 1 until the next Annual Meeting of the Council, or until the next review of political representation under Section 15 of the Local Government and Housing Act 1989, whichever is the earlier.**

- 2) **Members be appointed to the Committees and as substitute members in accordance with nominations made by Group Leaders.**
- 3) **the terms of reference for the Boards and Committees be confirmed.**

14\26

COUNCIL APPOINTMENTS TO OUTSIDE BODIES 2026/27

The Leader presented a report detailing proposed Council appointments to outside bodies for the 2026/27 municipal year.

Members were informed that the Council considered appointments to a number of outside bodies each year. Some of these appointments were made by full Council. Other appointments were made in an ex officio capacity, which meant that specific Cabinet members or other Councillors needed to be appointed. Council was advised that the Cabinet appointments would be considered at the June meeting of the Cabinet.

Group leaders had been consulted in advance of the Annual Council meeting regarding their nominations to the list of outside bodies. The Leader thanked all group leaders for confirming their nominations in advance of the meeting.

Following the presentation of the report, reference was made to the potential for Members appointed to outside bodies to update Council on the work of these external Committees, organisations and groups. Concerns were raised that updates were received from Members infrequently and the suggestion was made that, due to the importance of some of these groups, particularly the West Mercia Police and Crime Panel and the Herefordshire and Worcestershire Integrated Care Partnership, reporting arrangements should be formalised.

In response to these concerns, the following points were raised:

- Amphlett Hall Management Committee met regularly and reference had been made to the Committee's work in the previous Portfolio Holder Annual Report to Council received from the then Portfolio Holder for Strategic Housing and Health and Well-Being.
- Two Members had been appointed to serve on the Bromsgrove and Redditch branch of the Citizens Advice Bureau (CAB) and updates on the CAB's work had been received during the year.
- The suggestion was made that the Herefordshire and Worcestershire Integrated Care Partnership might be in the process of reviewing arrangements.
- The Midlands Joint Council for Environmental Protection had not held any meetings and therefore no updates were available to provide to Members.
- The Overview and Scrutiny Board had already requested the attendance of the Council's representative on the West Mercia

Police and Crime Panel to provide updates during the year on the work of the Panel.

- The Council's representative on the Worcestershire Health Overview and Scrutiny Committee (HOSC) was required to provide updates on the work of the Committee at every meeting of the Overview and Scrutiny Board and did so.
- The work of the Worcestershire Regulatory Services (WRS) Board had been and would continue to be addressed in the Portfolio Holder Annual Reports from the relevant lead Cabinet Member for WRS.
- The WMTemps Partnership Board had not held a meeting and therefore no updates were available.
- The work of Worcestershire County Council's Corporate Parenting Board was very complex. The minutes of meetings of the Board were in the public domain and could be accessed on Worcestershire County Council's website. Members were asked to note that the Council's representative had been liaising with Bromsgrove District Council's HR department about the potential to ensure that young people seeking employment could secure an interview, subject to compliance with employment law requirements and Council policies.

Following these comments, questions were raised about the potential for all of these updates to be appended to the Outside Bodies report when it was considered at the Annual Council meeting. However, Members were asked to note that the purpose of the report was supposed to be to appoint Members to serve on the outside bodies for the forthcoming municipal year, not to focus on updates from the representatives who had served on those outside bodies in the previous municipal year.

The nominations were proposed by Councillor K. May and seconded by Councillor S. Baxter.

RESOLVED that the nominations for Council appointments to outside bodies for the 2026/27 municipal year be approved.

15\26

BROMSGROVE DISTRICT LOCAL PLAN - NOTICE OF INTENTION TO COMMENCE LOCAL PLAN PREPARATION, LOCAL PLAN TIMETABLE AND SCOPING CONSULTATION

The Cabinet Member for Planning and Strategic Housing presented the Bromsgrove District Local Plan – Notice of Intention to Commence Local Plan Preparation, Local Plan Timetable and Scoping Consultation report.

Members were advised that the aim of the plan was to streamline and speed up the Local Plan setting process. The first stage of the process would be to publish notification to commence Local Plan preparation, in line with legislative requirements. The Council had secured Government funding which was linked to meeting deadlines for the Local Plan process.

Subject to Members' approval at the meeting, the intention was to publish the notice on 29th June 2026. A scoping consultation would commence thereafter, in summer 2026, which would follow a further report to the Council meeting due to take place in July. This report would not include a spatial strategy, policy or site options. Members were asked to note that people would not need to resubmit comments that had been made in response to the Council's previous consultation on this subject.

At a later date, the draft Local Plan would take on board the draft infrastructure plan and comments received through consultation. The draft Local Plan would be considered by the Planning Inspectorate. It was anticipated that the final Local Plan would be implemented from spring 2028 onwards.

The Planning Policy team would continue to work on the Local Plan process moving forward. Three further employees were due to be recruited to assist with this work.

Following the presentation of the report, Members discussed a range of points in detail:

- The number of speculative planning applications that had been submitted to the Council in recent months by developers and the need for action to be taken on the Local Plan process to address this situation.
- The greater control available to local authorities to manage the planning process when a Local Plan was in place.
- The need for the Council to work on the Local Plan and to respond to national changes to planning policies.
- The responses that had been received from the public during the previous consultation exercise and the implications for the content of the Local Plan.
- The potential for data relating to consultation feedback to be provided at a ward level and for this to be made available to the public. Officers explained that some data could be shared at a ward level, however, Members were asked to note that some respondents did not share an address so this would not be possible for all responses.
- The lack of a 5-year land supply in the District. It was noted that the Council had been working on this.
- The number of new houses that the Council was required by the Government to approve for development each year and the fact that this number had increased when the local authority had attempted to challenge the Government on this figure.
- The speed with which decisions had historically been taken on the Local Plan process and the extent to which this had impacted on the current position at the Council.
- The fact that Councils that had already adopted a Local Plan were similarly having to review their policies in light of changing

Government requirements. Council was informed that these authorities were having to amend their policies more quickly than the process that applied to the development of the new Bromsgrove Local Plan.

- The training that had been attended by Members in respect of the Local Plan process.
- The green belt land in Bromsgrove District and the impact of the concept of the Grey Belt on housing development moving forward.
- The reason why the proposed date to publish the notice of intent on 29th June and a subsequent report would then be presented in July rather than at the Annual Council meeting. Officers clarified that scoping documents needed to be considered and approved at a meeting of Council. If the notice was published earlier, then the Council would need to convene at an earlier date to consider the matter.
- The work that had been undertaken by the Local Plan Cross Party Working Group to consider the timetable and Local Plan process.
- The anticipated date by which the complete summary and timetable would be issued for the Local Plan.
- The likely content of the summary of the responses received during the consultation.
- The process that would be used to report back to people who submitted comments in a non-electronic manner during the consultation period.
- The reason for the delay in providing a summary of the feedback that had been received during the Council's consultation process. Members noted that the consultation had closed seven months prior to the Annual Council meeting. Council was advised that the next phase in consultation on the sites for inclusion in the Local Plan would occur in 2027 and information would be published at that point.
- The reason why the Council had not triggered the notice of intention on the earliest date permitted by the Government on 26th March 2026. Officers explained that 26th March 2026 was the date when the legislation came out. The suggestion was made that it would have been too risky for the Council to act on the legislation on that date, as prior to then, there was uncertainty about the Government's requirements and there would not have been time to prepare.
- The role of the Local Plan Cross Party Working Group in considering many matters relating to the Local Plan process.
- The hard work of the Council's Planning Department on the Local Plan.

The recommendations were proposed by Councillor S. Baxter and seconded by Councillor K. May.

RESOLVED that

- 1) The Notice of Intention to Commence Local Plan Preparation be approved; and
- 2) The Local Plan timetable be approved.

(At the start of the debate in respect of this item, Members voted to suspend standing orders for the item to enable the Strategic Planning and Conservation Manager to speak and answer Members' questions.

At the end of this item there was a brief adjournment which lasted from 19.55 – 20.06.)

16\26

CABINET RECOMMENDATIONS

The Chairman opened the item by explaining that there were no recommendations from the meeting of Cabinet held on 6th March 2026 requiring consideration. This was because the recommendations arising from that meeting had subsequently been considered at the Council meeting held on the same date.

Members were asked to note that no recommendations had been made for Council's consideration at the meeting of Cabinet held on 25th March 2026. Therefore, Council was only due to consider recommendations arising from the meeting of the Cabinet held on 20th April 2026.

Recommendations on the following subjects were discussed during the meeting:

Revision of the Environmental Crime Enforcement Policy

The Cabinet Member for Environmental Services and Community Safety presented proposed revisions to the Environmental Crime Enforcement Policy. Members were advised that the updates to the policy were designed to protect the local environment. This policy did not extend to addressing problems with abandoned vehicles or graffiti.

In considering the report, Members commented on the following points:

- The powers available to the Council to remove abandoned vehicles and which team dealt with this. Members were advised that a response would be provided to this query after the meeting.
- The wider equality impact assessment that was proposed for the policy update, who would be consulted when undertaking the assessment and the timescales for this consultation. Council was advised that further information would be provided in response to this query after the meeting.
- The responsibilities that everybody had in terms of disposing of waste appropriately and the value arising from Members notifying their residents of the need to check the licences of organisations that offered to dispose of waste on their behalf.

- The fines that could be issued against dog owners when their pets fouled in public places and they did not have access to an appropriate receptacle in which to dispose of the faeces.

The recommendation was proposed by Councillor P. Whittaker and seconded by Councillor K. May.

RESOLVED that the Bromsgrove and Redditch Enforcement Policy be adopted and replace the previous Joint Environmental Enforcement Policy.

Introduction of Enforcement of Littering from Vehicles

The Cabinet Member for Environmental Services and Community Safety presented a report that proposed the introduction of the enforcement of littering from vehicles.

The proposals detailed in the report would enable the Civil Enforcement Officers working in the District to issue Penalty Charge Notices (PCNs) when people in vehicles were observed to be engaged in littering behaviour. Previously, this had been treated as a criminal offence and the burden of proof was onerous for this. By contrast, under the proposals before Members, Civil Enforcement Officers would have the power to act when littering was observed.

Members discussed the proposals and in doing so noted that the power to issue PCNs to people observed to be littering from vehicles was likely to be welcomed by many local residents. However, it was noted that often littering occurred from vehicles without this being observed. The suggestion was made that it might therefore be helpful to monitor the effectiveness of this approach in tackling litter moving forward.

Questions were raised about whether technical equipment could be used to enable officers to issue PCNs safely. It was noted that Civil Enforcement Officers unfortunately sometimes encountered aggressive behaviour amongst people when undertaking enforcement work and questions were raised about whether the issuing of PCNs on a face-to-face basis could place staff at risk. Confirmation was provided that remote issuing of PCNs, using electronic tools, was the method that would be adopted at the Council.

Reference was also made to Operation Snap, a police initiative whereby the public could offer the police dashcam footage when they investigated alleged crimes. Members queried whether dashcam footage provided by the public could be utilised by the Council's Civil Enforcement team. The Cabinet Member for Environmental Services and Community Safety suggested that he would explore this idea further.

Consideration was given to the length of time available to offenders, of no more than 14 days, to pay a reduced fine when issued with a PCN for littering from a vehicle. By contrast, it was noted that offenders had no

more than 10 days to pay a reduced rate for fines issued under the Environmental Crime Enforcement Policy. Clarification was requested on the reasons for this discrepancy, although Members were asked to note that there were two different types of penalty notice.

The recommendations were proposed by Councillor P. Whittaker and seconded by Councillor A. Dale.

RESOLVED that

- 1) Civil Enforcement of Littering from Vehicles be introduced;
- 2) The Civil Enforcement Team be given delegated authority to issue Litter Penalty Charge Notices;
- 3) The parking administration team be authorised to deal with appeals and enforcement matters in respect of Litter Penalty Charge Notices;
- 4) The Penalty Notice Charge be set at the level set by Council for Criminal offences where a Fixed Penalty Notice is served for Depositing Litter (section 87/88 of the Environmental Protection Act 1990) which for 2026/27 subject to Council approval are proposed to be set as:
 - a) £250; and
 - b) £125 for prompt payment (within 14 days); and
- 5) Authority be delegated to the Assistant Director Regeneration & Property to issue Penalty Notice Charges for Littering from Vehicles under The Littering From Vehicles Outside London (Keepers: Civil Penalties) Regulations 2018.

Climate Change Strategy 2026 to 2031

The Cabinet Member for Local Government Reorganisation, WRS and Climate Change presented the Climate Change Strategy 2026 to 2031.

The strategy replaced the Council's previous Carbon Reduction Action Plan and it set out a clear, practical pathway to reduce emissions from the Council's operations by 50% by 2030, and achieve Net Zero by 2040. It also aligned with national and international commitments, including the UK Net Zero target and the Paris Agreement. The aim of the strategy was to deliver real, tangible improvements for local residents, the environment, and the local economy.

The strategy was designed to be ambitious but grounded, focused on the areas where the Council could make the biggest difference. Key highlights raised for Members' attention included:

- Improving energy efficiency and renewable generation in Council buildings;
- Supporting warmer, more efficient homes and tackling fuel poverty;
- Decarbonising transport, including the Council's fleet and Electric Vehicle (EV) infrastructure;
- Embedding climate considerations into planning and development;
- Enhancing biodiversity and green spaces;
- Reducing waste and rolling out weekly food waste collections; and
- Strengthening partnerships, governance and funding.

Members were asked to note that these were all areas where the Council had direct control or strong influence.

Council was advised that action had already been taken in respect of tackling climate change, in line with the authority's declaration of a climate emergency. This included:

- Over £284,000 invested in domestic retrofit since 2019, improving homes and reducing bills;
- Nearly 613,000 kWh of EV charging delivered, saving around 479 tonnes of CO₂; and
- A downward trend in energy use across the Council's estate, supported by solar Photovoltaic (PV) installations.

The strategy built on that foundation and was designed to scale it up.

The actions proposed in the strategy would benefit local residents by:

- Reducing energy bills and tackling fuel poverty;
- Improving air quality and public health;
- Creating warmer, healthier homes;
- Supporting local green jobs and skills; and
- Enhancing green spaces and biodiversity.

A key strength of the strategy was how it would be delivered. Members were asked to note that the strategy would be embedded into service business plans, ensuring ownership across the organisation. Progress

would be monitored annually and reported to Cabinet and Council. In addition, a new climate dashboard would track carbon impacts and outcomes.

Members were asked to note that the Council could not tackle climate change alone. Partnership working would instead be key to future success, which would involve working with:

- Worcestershire County Council and regional partners;
- Housing providers and businesses; and
- Community organisations and residents.

This collaboration would be essential to unlocking funding, delivering projects, and maximising the impact across the District.

There were challenges and risks that could potentially impact on progress with the implementation of the strategy. This included:

- Funding constraints;
- Market and supply chain pressures;
- Policy and regulatory change; and
- Local Government Reorganisation.

However, the strategy was designed to be flexible and resilient, so that the Council could adapt while maintaining momentum. Implementation of the strategy would support the Council's work to address the 'Green Thread' which underpinned all of the priorities in the Council's Plan.

Once the report had been presented, Members discussed the following points in detail:

- The extent to which it would be appropriate to apply targets to help monitor progress with the implementation of the strategy and the impact at the local level.
- The action that had already been taken to tackle carbon emissions and climate change in Bromsgrove District and the potential for this to be highlighted as a key legacy achievement during Local Government Reorganisation. In particular, the Council's work with Birmingham University on air quality was highlighted as a positive outcome of previous efforts to tackle carbon emissions.
- The Eight Hills Project and progress that had been achieved on this. Members were informed that the Council had made it to the last four applicants but had ultimately not been awarded any funding. However, work on this project would continue and had been built into the Local Plan.
- The action that was being taken to plant trees in the District.
- The action that could be taken to ensure that new homes were adapted to address issues arising from climate change and the

extent to which these adaptations could be made to affordable homes in the District. Members were advised that as part of the work on the Local Plan information would be included on the environment.

- The graph that had been included in the report relating to energy consumption. Further information on this subject was requested to be provided to Members after the meeting.
- The hard work of the Council's Climate Change Manager on developing this strategy. Members thanked him for his hard work.
- The positive impact that action to tackle climate change and carbon emissions would have on children and young people growing up in the District.

The recommendations were proposed by Councillor K. Taylor and seconded by Councillor P. Whittaker.

RESOLVED that

- 1) The Council's Climate Change Strategy 2026–2031 be approved; and
- 2) An annual review of the Climate Change Strategy be reported to Council.

Empty Homes Strategy

The Cabinet Member for Planning and Strategic Housing presented the Empty Homes Strategy for Members' consideration.

Council was informed that the strategy was designed to respond to a growing housing challenge in the country. There were estimated to be over 5,000 empty domestic properties in the UK, including in excess of 600 empty homes in Bromsgrove District. At the same time, there were lots of households registered on local housing registers and waiting to secure suitable social housing, including within the District. Returning vacant properties back to use could help to address some of the demand for appropriate accommodation.

There were additional risks associated with empty housing that Members were asked to take into account. This included that vacant properties could attract squatters, anti-social behaviour, and pests. Empty properties, if left unoccupied for some time, could also have a negative impact on the physical appearance of the local environment.

There were many potential causes of properties becoming vacant. This included probate, following the death of a resident, financial arrears and emotional attachments to homes.

Councils had broader responsibilities in respect of empty homes. Since 2018, local authorities had been able to charge property owners extra

Council Tax for empty homes. Councils were encouraged to engage with relatives at an early stage to ensure that appropriate advice and support could be offered where needed.

After the report had been presented, Members discussed the content and in doing so referred to the potential for the return of empty homes into use to be taken into account as part of the Council's work to meet the Government's house building target for the District. Clarification was provided that this was treated as a separate matter.

Reference was made to the potential for data on empty homes to be provided broken down to ward level and distinguishing between private and social housing. In addition, questions were raised about the potential for an accurate figure to be provided in respect of the housing waiting list for residents based in Bromsgrove District. Members were informed that there were 3,749 households on the housing waiting list at that time, although there were due to be changes to arrangements in the future that would result in a change to the calculations. It was further noted that there could be a difference between households listed on the housing waiting list and those in desperate need of more suitable accommodation, which included people living temporarily in Bed and Breakfast (B&B) accommodation.

Members commented that they were aware of a number of cases where residents had passed away and the award of their estate had been contested. Questions were raised as to whether this was taken into account in the strategy as well as in respect of the flexibility available to officers to act in these circumstances. Council was advised that communication and engagement would be key to the implementation of this strategy and there would be a need to assess requirements on a case-by-case basis.

The recommendation was proposed by Councillor S. Baxter and seconded by Councillor K. Taylor.

RESOLVED that the Bromsgrove District Council Empty Homes Strategy 2026 – 29 be adopted.

(Prior to consideration of the Empty Homes Strategy, Councillor C. Hotham declared an other disclosable interest in the item. Members were advised that a relative of Councillor Hotham was renovating a property located in the District and whilst this work was taking place the building was empty. Councillor Hotham took part in the debate and voted thereon.)

Renters Rights Act 2025

The Cabinet Member for Planning and Strategic Housing presented the Renters' Rights Act 2025 report.

The report provided an update on the implementation of the Renters Rights Act 2025, which received Royal Assent on 27th October 2025 and represented the most significant reform of the private rented sector in a generation. The Act fundamentally changed the relationship between tenants, landlords and local authorities and would have a direct operational impact on the Council, particularly the Private Sector Housing service.

Implementation was being introduced in three phases, with Phase 1 commencing on 1st May 2026. The introduction of the national landlord database in Phase 2 would provide a much clearer picture than at present of the sector locally.

From 1st May 2026, the Council had been required to enforce a number of major legislative changes. These included:

- The abolition of Section 21 “no fault” evictions;
- The introduction of assured periodic tenancies;
- Reforms to possession grounds;
- Restrictions on rent increases to once per year;
- The banning of rent bidding and excessive rent in advance;
- New protections preventing discrimination against families with children and tenants in receipt of benefits; and
- New rights for tenants to request pets.

The legislation also significantly strengthened local authority enforcement powers, including increased civil penalties and new reporting requirements.

Phase 2 of the legislation, expected from late 2026 onwards, would introduce a mandatory landlord database and a new Private Rented Sector Ombudsman.

Landlords would be required to register properties, provide key compliance information and pay an annual fee. This would increase transparency within the sector and expand the amount of regulated activity overseen by Councils.

Phase 3 would introduce the Decent Homes Standard into the private rented sector for the first time, alongside further anticipated reforms linked to energy efficiency standards and the future extension of Awaab’s Law.

The reforms would create significant operational pressures for the Council. The authority was anticipating:

- Increased enquiries from tenants regarding their rights;
- Additional enforcement activity; and

- Likely increases in homelessness approaches as some landlords would Exit the sector or issue notices ahead of implementation.

The Private Sector Housing team would also need to take on entirely new areas of enforcement activity, including:

- Discrimination offences;
- Unlawful rent practices;
- Pet request disputes; and
- Misuse of possession grounds.

To support implementation, funding had already been secured for a new regulatory case management system to improve enforcement recording, statutory reporting and case management processes.

Additional New Burdens and Domestic Abuse Grant funding had already been received earlier in the year, which would help to assist with further implementation costs. Those costs included:

- Officer training;
- IT improvements;
- Legal support; and
- Increased homelessness pressures.

There was a need to amend the Scheme of Delegations to ensure that the Assistant Director for Community and Housing Services was formally authorised to exercise the Council's new enforcement powers under the Renters Rights Act 2025. This was necessary to enable officers to act lawfully, proportionately and efficiently when investigating offences, issuing notices and exercising the Council's new enforcement responsibilities.

Following the presentation of the report, Members discussed a number of points in detail:

- The Government's timeframes for landlords in the private rented sector to meet decent homes standards.
- The positive impact that decent homes standards had had on the quality of housing in the social housing sector.
- The number of residents in Bromsgrove District living in the private rented sector who were likely to benefit from decent homes standards.
- The important role of the Strategic Housing team at the Council in respect of the Council's use of powers granted under the Renters Rights Act 2025.

- The extent to which additional staff would be needed to enable the Council to meet its duties and utilise powers provided in the Renters Rights Act 2025.
- The sad circumstances leading to Awaab's Law and the impact that the quality and location of housing could have on a child's prospects in life.
- The challenges that had historically been encountered by residents when they had been subject to no fault evictions and the positive impact on the security of residents that would arise from ending this practice.
- The suggestion was made that the majority of landlords operating in the District were good landlords. However, Members noted that the powers provided under the Renters Rights Act 2025 would help the authority to tackle rogue landlords and protect vulnerable residents.
- The support that the CAB could provide to tenants and landlords in the event of difficulties arising.
- The benefits arising from further information about the work of the Private Sector Housing team being shared with Members.
- The extent to which conversations had been held with Housing Associations regarding this matter.
- The approach that the Council would adopt to communicate new rights available to tenants under the Renters Rights Act 2025.
- The extent to which there was a risk that some landlords might involve bailiffs and the courts as a first choice now that no fault evictions were no longer an option. Concerns were raised that this could result in tenants gaining a criminal record which might otherwise not have occurred.
- The number of landlords who were likely to dispose of their properties in response to the legislation and the impact that this could have on the supply of suitable accommodation in the private rented sector.
- The potential for the impact of the Renters Rights Act 2025 to be reviewed six months after the legislation came into effect.
- The previous Member briefing that had been delivered on the subject of private sector housing by the team and the benefits arising from delivering an updated version of that briefing.

The recommendations were proposed by Councillor S. Baxter and seconded by Councillor K. Taylor.

RESOLVED that the Scheme of Delegations be amended to incorporate new powers under the Renters Rights Act 2025.

(During consideration of the Renters Rights Act 2025 report, Councillor S. Ammar declared an other disclosable interest as a landlord of a property located outside the District. She remained in the room during the debate and voted thereon.)

Quarter 3 2025/26 Finance and Performance Monitoring Report

The Cabinet Member for Finance presented the Quarter 4 Finance and Performance Monitoring Report 2025/26 for Members' consideration.

Council was advised that the report detailed the Council's budget position as of the end of the third quarter which ended in December 2025. Members were asked to note that a more accurate overview of the position at the end of the financial year would emerge in the Quarter 4 report.

The report included the latest Treasury Monitoring report, which provided information about borrowing and financial resilience. The report was also proposing additional funding to address potholes on the road surface of the Aston Road Roundabout, which was on an unadopted highway.

During consideration of this item, questions were raised about the performance data that had been provided in respect of economic development and targets for fly tipping. However, Members were advised that this was not due to be considered at the Council meeting and instead it was suggested that information could be provided outside the meeting.

Questions were raised as to why Bromsgrove District Council was considering funding works to address potholes when highways functions were generally managed by Worcestershire County Council. Council was informed that because the highway had not been adopted, Worcestershire County Council's highways department was not responsible for the works and therefore Bromsgrove District Council had opted to cover the expenditure required.

The recommendations were proposed by Councillor S. Nock and seconded by Councillor K. May.

RESOLVED that

- 1) That the Balance Sheet Monitoring Position for Q3 is noted – which is the Treasury Monitoring Report and required to be reported to Council; and
- 2) That £120k capital funding be approved for work on fixing potholes on the Aston Road roundabout and the road leading to the depot.

17\26

TO NOTE THE MINUTES OF THE MEETINGS OF CABINET HELD ON 6TH MARCH, 25TH MARCH AND 20TH APRIL 2026

The minutes of the meetings of Cabinet held on 6th March, 25th March and 20th April 2026 were submitted.

RESOLVED that the minutes of the meetings of Cabinet held on 6th March, 25th March and 20th April 2026 be noted.

18\26

QUESTIONS ON NOTICE

Members were advised that there were no Questions on Notice for consideration at this meeting.

19\26

MOTIONS ON NOTICE - MOTION 2

The following Motion on Notice was submitted by Councillor S. Evans for Members' consideration:

“Council resolves to establish a cross-party working group, comprised of members of the Electoral Matters Committee together with any other interested Members, to undertake preparatory work to determine, in the context of Local Government reorganisation, future local governance arrangements within Bromsgrove District. The working group will consider the most appropriate arrangements for future local governance within Bromsgrove District, including the option to undertake a Community Governance Review and will report back to Council within six months with its findings and recommendations.”

The Motion was proposed by Councillor Evans and seconded by Councillor R. Hunter.

In proposing the Motion, Councillor Evans commented that his District Council ward was completely unparished, so he had had limited involvement with Parish Councils in his District Councillor capacity. However, as a County Councillor, he represented a division containing a number of Parish Councils and he had therefore learned over the last year about how effective and valuable they could be.

There was the potential for the Electoral Matters Committee to consider whether there was a need for a Community Governance Review in Bromsgrove District. Many other Councils had undertaken Community Governance Reviews in the build up to Local Government Reorganisation and Councillor Evans expressed the view that this had been a useful exercise. However, the Motion would not commit the Council to setting up new Parish Councils. Instead, the Motion committed the Council to undertaking a review of the available options.

Members subsequently discussed the Motion and in doing so commented on the following:

- The benefits of an inclusive approach.
- The valuable contributions made by Parish Councils.
- The potential for more clarity to be provided in the Motion about what the Council was seeking to achieve.

- The time required from officers to work on a review of whether to launch a Community Governance Review and whether this represented best use of resources given the ongoing work required on Local Government Reorganisation.
- The aim of the Government for each Unitary Authority to have Neighbourhood Area Committees to bring decisions about services closer to residents and the extent to which confusion could arise if both these Committees and Parish Councils were introduced in currently unparished areas.
- The extent to which it was appropriate for Bromsgrove District Council to make decisions about new Parish Councils rather than the new Unitary Authority.
- The other duties of Councillors who would be appointed to Neighbourhood Area Committees and whether they would be able to dedicate the same level of support to the work of these Committees as Parish Councillors elected to serve on a Parish Council.
- The value of making decisions based on the available evidence.
- The fact that Bromsgrove town was one of the few locations in Worcestershire that was not represented by a Parish or Town Council.
- The potential for residents to be consulted about whether to introduce Parish Councils in unparished areas. Members noted that residents in these areas would need to be aware of a requirement to pay a parish precept if a Parish Council was introduced.
- The extent to which there was a risk that Bromsgrove District Council's assets, once inherited by a new Unitary Authority, might be sold to help address any financial challenges and the implications for the District's heritage.
- The fact that a Parish Council could own assets whilst a Neighbourhood Area Committee would be unable to own assets.
- The extent to which it was appropriate for the Electoral Matters Committee to be called upon to conduct the proposed review. Confirmation was provided that this was an appropriate role for the Electoral Matters Committee, although it was noted that for previous reviews, the Electoral Matters Committee had extended an invitation to other Councillors who were not Members of the Committee to participate in review work.

On being put to the vote, the Motion was carried.

RESOLVED to establish a cross-party working group, comprised of members of the Electoral Matters Committee together with any other interested Members, to undertake preparatory work to determine, in the context of Local Government reorganisation, future local governance arrangements within Bromsgrove District. The working group will consider the most appropriate arrangements for future local governance within Bromsgrove District, including the option to undertake a

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Community Governance Review and will report back to Council within six months with its findings and recommendations.

20\26

TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR OF LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIRMAN, BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT MEETING

There was no urgent business for consideration on this occasion.

The meeting closed at 9.40 p.m.

Chairman

APPENDIX 1 POLITICAL BALANCE CALCULATION - May 2026

The figures in *italics* are the mathematical calculations.

Committee	Cons 11 35.48% of total	Lab 6 19.35% of total	Lib Dems 7 22.58% of total	Independents 2025 6 19.35% of total	Non-aligned 1 3.23% of total	Total
Overview and Scrutiny Board	4 3.90	2 2.13	2 2.48 * Take 1 additional seat	2 2.13	0 0.36	11 11 members on Board 11
Licensing Committee	5 4.61 * Take 4 seats only	3 2.52	3 2.94	3 2.52	0 0.42	13 13 members on Cttee 13
Planning Committee	4 3.90 * Take 1 additional seat	2 2.13	2 2.48	2 2.13	0 0.36	11 11 members on Cttee 11
Audit, Stds & Gov'ce Committee	4 3.90	2 2.13	2 2.48	2 2.13	0 0.36 * Take 1 seat	11 11 members on Cttee 11
Electoral Matters Cttee	2 2.48	1 1.35	2 1.58	1 1.35	0 0.23 * Take 1 seat	7 7 members on Cttee 7
Appointments	2 1.77	1 0.97	1 1.13	1 0.97	0 0.16	5 5 members on Cttee 5
Entitled to	21	11	13	11	2	58
TOTAL received prior to balance	21	11	12	11	0	55
Exact Mathematical Entitlement	20.58	11.22	13.10	11.22	1.87	58
Final balanced total	21	11	13	11	2	58

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Request for the Establishment of Charter Trustees for Bromsgrove

Relevant Portfolio Holder	Councillor Karen May, Leader of the Council and Cabinet Member for Strategic Partnerships, Economic Development and Enabling
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Claire Felton, Assistant Director of Legal, Democratic and Procurement Services
Report Author	Melissa Bassett Job Title: Senior Electoral Services Officer Contact email: melissa.bassett@bromsgroveandredditch.gov.uk Contact Tel: 01527 587014
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	All
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Council RESOLVE that:

- 1) A request be submitted to the Ministry of Housing, Communities and Local Government for provision to be included in the relevant Structural Changes Order for the establishment of Charter Trustees for the unparished areas of the current Bromsgrove District from the re-organisation date; and**
- 2) Authority be delegated to the Chief Executive, following consultation with the Leader of the Council and the Monitoring Officer, to agree the wording of the request and to take any necessary steps to progress the proposal through the Local Government Reorganisation process.**

2. BACKGROUND

- 2.1** Local Government Reorganisation is expected to result in the abolition of Bromsgrove District Council and the transfer of local government functions to a new unitary authority from the reorganisation date,

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subject to the final decision of Government and the making of the necessary legislation.

- 2.2 The detailed arrangements for the transition to the new authority will be set out in a Structural Changes Order. The Order will establish the new local government structure, provide for the abolition of the predecessor Councils and set out the principal transitional and implementation arrangements.
- 2.3 At the Annual Council meeting on 20 May 2026, Members considered and approved a motion relating to future local governance arrangements in Bromsgrove in the context of Local Government Reorganisation.
- 2.4 The motion recognised the importance of ensuring that Bromsgrove retains appropriate local governance, civic identity and local representation following the abolition of the District Council. As part of this, the motion requested that officers work with Members of the Electoral Matters Committee through a Working Group to investigate the matters raised.
- 2.5 The Electoral Matters Committee met on 11 June 2026 to agree the scope and timetable for the Working Group. The Working Group also met on 11 June 2026 to consider the proposed approach and next steps.
- 2.6 As part of that work, the Electoral Matters Committee recommended that a report be brought forward to Council to seek a resolution requesting the establishment of Charter Trustees for Bromsgrove through the Local Government Reorganisation process.
- 2.7 This report has therefore been prepared following the recommendation of the Electoral Matters Committee and in the context of the wider work being undertaken by the Working Group on future local governance arrangements. The Electoral Matters Committee will be reporting back to Council on wider local governance arrangements at its October meeting.
- 2.8 Officers have also consulted with the Ministry of Housing, Communities and Local Government (MHCLG) to clarify whether Charter Trustees could be established where no Royal Charter is currently in place. MHCLG confirmed that this would be possible through the Local Government Reorganisation process. However, as there is no current charter providing for a Mayor of Bromsgrove, the proposed arrangements would be limited to the preservation of relevant civic and

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ceremonial property and traditions, rather than the continuation of a mayoralty.

- 2.9 The proposal to request Charter Trustees is separate from, but related to, the wider consideration of future local governance in Bromsgrove. It is intended to safeguard civic and ceremonial arrangements in the event that Bromsgrove District Council is abolished, while further work continues on options such as a Community Governance Review and any future parish or town council arrangements.

3. OPERATIONAL ISSUES

- 3.1 Charter Trustees may be established through an order made as part of Local Government Reorganisation. Their purpose is to preserve the historic rights, privileges and traditions associated with an area where the existing Council is being abolished.
- 3.2 For Bromsgrove, the establishment of Charter Trustees would provide a mechanism to safeguard civic and ceremonial property and ensure continuity for civic traditions connected with the current District Council area, particularly in the unparished areas where there is no existing parish council in place to receive or continue those arrangements.
- 3.3 Charter Trustees would not replace the local government functions currently exercised by Bromsgrove District Council and would not operate as a further tier of local government. Their responsibilities would be limited principally to civic and ceremonial matters and the preservation of the Borough's historic rights and traditions.
- 3.4 The proposal would not determine the wider neighbourhood governance arrangements for Bromsgrove. It would not prevent a future Community Governance Review from considering whether parish or town council arrangements should be established for any part of the area.

Membership and operation

- 3.5 Charter Trustees are not normally appointed in the same way as appointments to outside bodies. Under the Charter Trustees Regulations 2009, the Charter Trustees would ordinarily be the councillors of the new unitary authority who are elected for electoral areas falling within the Charter Trustee area.

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- 3.6 For Bromsgrove, this means that membership of the Charter Trustees would be expected to consist of those councillors elected to the new unitary authority for the area covered by the Charter Trustees. It would not normally include councillors elected for areas outside the Charter Trustee area.
- 3.7 The Regulations do, however, allow for additional Charter Trustees to be appointed in certain circumstances. This may include cases where the number of Charter Trustees for the area would otherwise be fewer than five, or where up to three additional Charter Trustees are considered desirable. Any additional Charter Trustee must be a councillor of the relevant council, which would be the new unitary authority.
- 3.8 The Charter Trustees would be required to establish appropriate administrative and governance arrangements, including arrangements for meetings, standing orders, financial administration, record keeping and the custody and use of civic property.

Civic and Ceremonial Property

- 3.9 The Charter Trustees Regulations 2009 provide for charters, insignia, plate and other property of a historic or ceremonial nature relating to the charter trustee area to vest in the Charter Trustees on the reorganisation date.
- 3.10 Further work will be required to identify and record the property which may be appropriate for transfer. This is expected to include any civic insignia, chains of office, regalia, plate and other items used in connection with the Council's civic and ceremonial traditions.
- 3.11 An inventory of relevant civic and ceremonial property will need to be prepared as part of the transition process. Legal advice may also be required where there is any uncertainty about whether a particular item falls within the definition of historic or ceremonial property.
- 3.12 The Charter Trustees would represent the unparished area of the current Bromsgrove District, unless a different area is provided for in the relevant Structural Changes Order.
- 3.13 Existing parished areas would not normally form part of the Charter Trustee area because they already have parish councils in place.
- 3.14 The precise boundary of the charter trustee area would need to be defined in the Structural Changes Order, normally by reference to the

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relevant electoral areas or other geographical descriptions applying at the time the Order is made.

- 3.15 If all or part of the charter trustee area subsequently becomes parished through a Community Governance Review, the effect on the Charter Trustees would be governed by the relevant legislation. Where the whole charter trustee area becomes comprised within one or more parishes, the Charter Trustees would be dissolved and their property, rights and liabilities would transfer in accordance with the applicable statutory arrangements.

Electoral areas within the proposed Charter trustee area

- 3.16 The proposed Charter Trustee area would comprise the unparished areas of the current Bromsgrove District. The Council has identified the county divisions which, based on the proposed unitary electoral arrangements, include all or part of the unparished area of Bromsgrove. It is proposed that councillors elected to the new unitary authority for those electoral areas would become Charter Trustees for Bromsgrove, subject to the final provisions included in the Structural Changes Order.
- 3.17 On that basis, the following electoral areas are proposed to fall within the scope of the Bromsgrove Charter Trustee arrangements:
- Beacon
 - Bromsgrove Central
 - Bromsgrove East
 - Bromsgrove South
 - Bromsgrove West
 - Woodvale

- 3.18 The establishment, membership and detailed operation of the Charter Trustees would remain dependent on the final wording of the Structural Changes Order and any associated statutory provisions.

Structural Changes Order

- 3.19 The establishment of Charter Trustees would need to be provided for through the Structural Changes Order or other associated legislation made as part of the Local Government Reorganisation process.
- 3.20 It is therefore proposed that the Council submits a formal request to the Ministry of Housing, Communities and Local Government at the

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appropriate stage, asking that provision for the Bromsgrove Charter Trustees be included within the relevant Order.

- 3.21 The request should be made early enough to allow the proposed arrangements, geographical area and treatment of civic property to be considered during the preparation of the Order and before the reorganisation date.
- 3.22 Further reports will be required during the transition period to address the detailed operating arrangements, budget, civic programme, administrative support and transfer of property to the Charter Trustees.

4. FINANCIAL IMPLICATIONS

- 4.1 The submission of a request for Charter Trustees is not expected to result in significant immediate expenditure. There will, however, be officer resource implications associated with identifying civic and ceremonial property, supporting the development of the Structural Changes Order and establishing the necessary governance arrangements.
- 4.2 Additional one off costs may arise during the transition period, including the preparation of inventories of civic property, legal advice relating to asset transfers and the establishment of financial and governance arrangements. These costs are not currently expected to be material and will be met from the Local Government Reorganisation reserve.
- 4.3 In the financial year in which the Charter Trustees are established, Charter Trustees may receive funding through arrangements established as part of the Local Government Reorganisation process, including the consideration of any existing civic budgets that transfer from Bromsgrove District Council.
- 4.4 Thereafter, Charter Trustees are able to issue a council tax precept on properties within the Charter Trustee area. This would be identified as a separate charge on council tax bills for residents within that area. The level of any precept would be determined annual by the Charter Trustees based on their approved budget.
- 4.5 Further reports will be required to determine the detailed budget, administrative support requirements and any ongoing costs associated with this.

5. LEGAL IMPLICATIONS

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- 5.1 The Charter Trustees Regulations 2009 set out the principal arrangements applying to Charter Trustees established through Local Government Reorganisation. These include provision relating to the transfer and holding of historic and ceremonial property, membership, the appointment of additional trustees, meetings, financial administration and other procedural matters.
- 5.2 The Regulations provide that relevant charters, insignia, plate and other historic and ceremonial property relating to the charter trustee area vest in the Charter Trustees on the reorganisation date.
- 5.3 The Charter Trustees would consist principally of members of the new unitary authority elected for electoral areas within the charter trustee area. The statutory arrangements also allow for additional Charter Trustees to be appointed in specified circumstances.
- 5.4 The proposed Charter Trustees can only be established through the relevant statutory process. A resolution of Bromsgrove District Council would amount to a request for provision to be included in the Structural Changes Order and would not, by itself, establish the Charter Trustees.
- 5.5 Further legal advice will be required during the preparation of the Order and the transfer process, particularly in relation to the property to be transferred, the preservation of charter rights and the detailed governance arrangements.

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6. OTHER - IMPLICATIONS

Local Government Reorganisation

- 6.1 The proposal arises directly from Local Government Reorganisation and the expected abolition of Bromsgrove District Council. Establishing Charter Trustees would provide a mechanism to protect civic and ceremonial arrangements following the transfer to a larger unitary authority.
- 6.2 The detailed arrangements for the Charter Trustees would need to be developed alongside the wider Local Government Reorganisation transition programme and in consultation with MHCLG, the implementation body and, following its establishment, the shadow authority.
- 6.3 The proposal would not determine the wider neighbourhood governance arrangements of the new unitary authority and would not prevent a future Community Governance Review from considering parish or town council arrangements for Bromsgrove.

Relevant Council Priority

- 6.4 Work on local governance arrangements supports all the Council's current priorities.

Climate Change Implications

- 6.5 There are no direct climate change implications arising from the proposals detailed in this report.

Equalities and Diversity Implications

- 6.6 No direct equalities implications have been identified at this stage.

7. RISK MANAGEMENT

- 7.1 The principal risk is that, if no provision is made before the reorganisation date, Bromsgrove's civic and ceremonial traditions may not continue in their current local form.
- 7.2 There is also a risk that historic and ceremonial property may transfer to the new unitary authority without arrangements being in place for its continued local use and custody. This will be mitigated by making an

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early request for Charter Trustees and preparing an inventory of relevant property.

- 7.3 Financial and administrative risks will be managed by developing a proportionate operating model and bringing forward further proposals once the future structure, membership and support requirements are clearer.
- 7.4 There is a further risk that the role of Charter Trustees could be misunderstood as creating a new tier of local government or determining the outcome of future local governance arrangements. This will be mitigated by making clear that Charter Trustees would have a limited civic and ceremonial role and would not prevent future consideration of parish or town council arrangements through a Community Governance Review.

8. APPENDICES and BACKGROUND PAPERS

Background Papers

- *The Charter Trustees Regulations 2009*
- *The Local Government and Public Involvement in Health Act 2007*
- *Report: Local Government Reorganisation: Implications for Local Governance in Bromsgrove, Electoral Matters Committee - 07 November 2025*
- *Report: establishment of a Working Group to Consider Future Local Governance Arrangements, Electoral Matters Committee – 11 June 2026*

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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Karen May, Leader of the Council and Cabinet Member for Strategic Partnerships, Economic Development and Enabling	
Assistant Director	Claire Felton, Assistant Director of Legal, Democratic and Procurement Services	
Financial Services	Deb Goodall, Assistant Director Finance and Customer Services	03/07/2026

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Bromsgrove District Local Plan – Scoping Report Consultation

Relevant Cabinet Member	Councillor Sue Baxter
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Ruth Bamford
Report Author Mike Dunphy	Job Title: Strategic Planning and Conservation Manager email: m.dunphy@bromsgroveandredditch.gov.uk Contact Tel: 01527 881325
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Economic Development Environment Housing Infrastructure
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

Council is asked to RESOLVE that

1. The Bromsgrove District Local Plan Scoping Report at Appendix A is approved for consultation from the 24th July to the 4th September 2026 inclusive.

2. BACKGROUND

- 2.1 The Government has introduced a new system for plan making in the UK. For Bromsgrove District Council this means that a new plan needs to be prepared under the new system. The previous progress made on the Bromsgrove District Local Plan (that was being prepared under the old system), most notably the information obtained from consultation on the Draft Development Strategy over the Summer and Autumn of 2025, will be rolled forward into the new plan making system. This work will be used to help inform the decisions taken as the Council prepares the new draft plan.
- 2.2 The Government introduced new regulations in March 2026 setting out various formal stages that plans prepared under the new system have to go through. The new system, together with emerging changes to the National Planning Policy Framework (NPPF), are intended to streamline plan-making to allow for quicker adoption of Local Plans,

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therefore increasing the delivery of new sustainable development, including housing and economic development, across the country.

- 2.3 The purpose of this report is to seek approval to undertake consultation on the Bromsgrove District Local Plan – Scoping Report.

3. OPERATIONAL ISSUES

- 3.1 At the Council meeting held on the 20th May, the Notice of Intention to Commence Local Plan Preparation and The Local Plan timetable were both approved. The accompanying report for that meeting also included outline details of the Bromsgrove District Local Plan – Scoping Report. A copy of the Scoping Report is provided at appendix A.

- 3.2 The approved Local Plan Timetable is set out below:

Local plan event	Start date	End date
1) Publish local plan timetable under regulation 8	29 th June 2026	
2) Publish notice of intention to commence local plan preparation under regulation 19(1)	29 th June 2026	
3) Publish notice of scoping consultation under regulation 20(1)(b)	See event 4 Below	
4) Scoping consultation under regulation 20	6 week period during July/August/September 2026TBC	
5) Gateway 1: Publish Gateway 1 self-assessment summary under regulation 21(3)	October 2026	
6) Publish summary of scoping consultation under regulation 22	October 2026	
7) Publish notice of local plan content and evidence consultation under regulation 23(1)(a)	June 2027	
8) Consultation on the proposed local plan content and evidence (not less than six weeks) under regulation 23	June 2027	July/August 2027
9) Publish summary of consultation on the proposed local plan content and evidence under regulation 24	October 2027	
10) Gateway 2: observations and advice will be sought under section 15CA(3)	October 2027	

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Local plan event	Start date	End date
of the Act in accordance with regulation 26		
11) Publish Gateway 2 observations and advice in accordance with section 15CA(5) of the Act and regulation 26(5)	November/December 2027	
12) Publish notice of proposed local plan consultation under regulation 27(1)(a)	March 2028	
13) Consultation on the proposed local plan (not less than eight weeks) under regulation 27	March 2028	April/May 2028
14) Publish summary of consultation on the proposed local plan under regulation 30	August/September 2028	
15) Gateway 3: observations and advice will be sought under section 15CA(3) of the Act in accordance with regulation 31	August/September 2028	
16) Publish Gateway 3 observations and advice in accordance with section 15CA(5) of the Act and regulation 31(5)	September/October 2028	
17) Submit the proposed local plan for independent examination under section 15D(1) of the Act	October 2028	
18) Publish the examiner's recommendations and reasons in accordance with section 15D(13) of the Act and regulation 37.	TBC	
19) Adoption of the local plan under section 15EA of the Act	April 2029	

3.3 As can be seen the approved timetable requires at item 4, 'a Scoping consultation under regulation 20' for a '6-week period during July/August/September 2026 TBC'. It can now be confirmed that this consultation has been scheduled for the 6-week period beginning on the 24th July and ending on the 4th September.

3.4 Neither the Regulations nor the guidance that the Government has published set out precisely what a Scoping Consultation must entail. The guidance is repeated below:

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“This consultation stage provides the local community and other key stakeholders with the opportunity to have their say at the very start of the plan-making process. You must ask for views on:

- *what to include in the local plan*
- *how to approach future local plan engagement*
- *any other matters that you want to consult on*

You must run your scoping consultation after you have given notice of intention to commence plan-making. This consultation should last for at least 21 days and must finish before you publish your Gateway 1 self-assessment summary. You should use the feedback from the scoping consultation to inform your community engagement strategy.

For this consultation, you must invite representations from the:

- *general consultation bodies you consider appropriate*
- *specific consultation bodies you consider may have an interest in the preparation of the local plan*

You do not have to invite anyone else, but anyone can make representations at this stage.”

3.5 The Regulations only require the scoping document to addresses the following issues:

- What the Council should include in a Local Plan,
- How you would like the Council to consult you during the preparation of the Local Plan.

As can be seen, the Scoping Consultation is envisaged to be a high level consultation. It is not intended to set a spatial strategy or contain details on any future policy or site allocations. As set out above, the Council has already undertaken extensive consultation last year. The Scoping Report makes it clear, that people who have already responded to the Draft Development Strategy consultation do not need to resubmit their representations, they will still be taken into account in the preparation of the plan under the new system. It is also stressed that there will be further opportunities to comment on detailed policies and possible site allocations as the new plan progresses, as per the stages outlined below.

3.6 As can be seen from above, the purpose of the scoping document is to seek stakeholder views at the outset of the plan-making process. This includes, but is not limited to, local residents, parish councils, infrastructure providers, statutory agencies, local businesses,

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developers and agents. As the Council has already sought the views via a number of local plan consultations under the old plan making system, the scoping document has been drafted to ensure the views relevant to the scope of the plan that have already been expressed are reflected in the document.

- 3.7 The timetable above indicates that the Council will consult on the draft plan in the summer of 2027, and a final plan March 2028. It is at as these opportunities where further details will be available such as the possible sites chosen for development and the associated policies and infrastructure requirements.

4. FINANCIAL IMPLICATIONS

- 4.1 The Local Plan process has a budget of £823k, financed as follows:
- 4.2 An initial £645k has been identified in reserves from 2026/27 onwards to fund the evidence base development, Examination in Public costs and any associated legal fees.
- 4.3 Funding of £70k has been awarded by the Ministry of Housing, Communities and Local Government (MHCLG) to progress the Green Belt Assessment. An additional £108k has been awarded by MHCLG to help progress the Local Plan. To release the £108k the following requirements must be met by the Council:
- Publish a Notice of Intention to commence Local Plan preparation by 30th June 2026; and
 - Publish Gateway 1 self-assessment by 31st October 2026.
- 4.4 The total available budget is £823k is proposed to be spent as per the table below.

Evidence base costs BDC	£420k
Legal Fees	£125k
Examination costs	£100k
MHCLG Green Belt Review	£70k
MHCLG Plan Making	£108k
Total Local Plan Spend	£823k

- 4.5 Staffing resource comes from existing posts within the establishment supplemented by three additional posts There is currently one vacancy

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within the establishment and this, and additional posts, are currently in the process being recruited to.

5. LEGAL IMPLICATIONS

- 5.1 The new plan making system is now set out in the following regulations The Town and Country Planning (Local Planning) (England) Regulations 2026.

6. OTHER - IMPLICATIONS

Local Government Reorganisation

- 6.1 In June 2025, MHCLG wrote to Chief Executives of the Worcestershire Councils with an update on Local Government Reorganisation. Included within that letter is the following statement:

‘The Government also recognises that developing proposals could distract councils from their essential day-to-day activities. However, residents and businesses depend on councils to deliver crucial services and to continue the efforts needed to establish successful new unitary councils. This is particularly important for advancing local plans to allocate land for new homes. As mentioned in the invitation letters, the Government expects local planning councils to work towards adopting an up-to-date local plan as soon as possible. Local Government Reorganisation should not hinder this vital work, nor should the introduction of the new legal framework for local plan-making later this year or our strategic planning reforms. Significant financial support has already been provided to eligible councils to aid in plan-making, and we encourage councils to utilise additional support available through the Local Government Association’s Planning Advisory Service.’

- 6.2 The position expressed above remains unchanged, plan-making must continue irrespective of the Local Government Reorganisation work.

Relevant Council Priority

- 6.3 The Bromsgrove District Local Plan is relevant to the following Council priorities:
1. Economic Development
 2. Housing
 3. Environment

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4. Infrastructure

Climate Change Implications

- 6.4 The Bromsgrove District Local Plan will have significant implications for climate change, shaping the location and nature of new housing, employment, and infrastructure development.

Community Impact Implications

- 6.6 The approval Bromsgrove District Local Plan – Scoping Report will provide the communities across Bromsgrove District with valuable next stepson how the Bromsgrove District Local Plan will be progressed. The final adopted local plan will have policies and allocations which address high quality design, provide for safer communities and help to address wider health and wellbeing by providing communities facilities and accessible open space.

Equalities and Diversity Implications

- 6.7 The consultation process is open to all to comment.

7. RISK MANAGEMENT

- 7.1 The Bromsgrove District Local Plan progress is being monitored via the Council's Corporate Risk Register.
- 7.2 The risk of not progressing a new Local Plan has been discussed at length in many forums. Whilst the Council does not have to begin plan-making under the new system until December 2026, there is no need to delay the initial processes under the new system until then. MHCLG has made it very clear that it expects plan-making to continue at pace and will not be afraid to intervene if plan-making does not progress.
- 7.3 Plan-making is strongly encouraged without delay. It suggests that the Council is committed to plan-making. Whilst simply progressing the earlier stages of plan-making does not give the control an adopted Local Plan gives, progressing a Local Plan as identified by this report does help to provide evidence that the plan is progressing and shows a pathway to adopting a plan. This is useful information to use in other settings such as development management.
- 7.4 In addition, should the scoping consultation not take place as described in this report, then the additional funding secured will have to be returned to the Government.

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8. APPENDICES and BACKGROUND PAPERS

Appendix A Bromsgrove District Local Plan – Scoping Report

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Sue Baxter	26.06.26
Lead Director / Assistant Director	Guy Revans /Ruth Bamford	01.07.26
Financial Services	James Walton	06.07.26
Legal Services	Claire Felton	01.07.26

Bromsgrove District Local Plan – Scoping Document (July 2026)

Foreword

Thank you for joining us on the next stage of our local plan-making journey.

Last summer we came out into our communities over a four month period to listen to you and gather your views on potential development sites and the infrastructure that needs to come hand-in-hand with development. We received thousands of useful comments from you, and I would like you to rest assured that these were invaluable and will continue to inform the local plan as it evolves over the next couple of years. We have listened and we will continue to listen - please read through this document to see how the views we have received are shaping the way your Local Plan is developing.

You may recall that we said that at some point we would need to align ourselves with the Government's new plan-making process. We've now reached that point, and we have to ask specific questions of you in order to proceed through the new system. That's what this document is focussed on.

It may feel like this document doesn't delve as deeply as last summer's consultation did, it doesn't, but this is so it aligns with the new system. It is a scoping document which gives us an important opportunity to take stock and consider where we go next. The comments you took time to send us last year are still extremely pertinent and we will of course continue to take into account the comments you have already sent us, and if you have nothing further to say at this time there's no need to spend precious time resubmitting your comments to us again now. The way these new scoping reports are prepared means that there isn't any site specific element to this consultation, but rest assured there will be further chances to let us know what you think about whatever sites are identified in the next draft of the local plan.

We invite you to read on further and welcome your input on the questions within this document, which will help us to move at pace into the new plan making system, and ensure we have a plan that we can all be proud of.

More details on how to respond can be seen in section 2 . It's a simple process, the online survey, email address, and postal addresses are below, we'd love to hear from you.

Online – [Smart Survey link from our website](#)

By email – bromsgroveplan@bromsgroveandredditch.gov.uk

By post – Strategic Planning, Bromsgrove District Council, Parkside, Market Street, Bromsgrove, Worcestershire, B61 8DA

Cllr Sue Baxter
Deputy Leader
Portfolio Holder for Planning and Strategic Housing

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Section 1 – what you have told us, and what we are doing about it? The key challenges and priorities.

In the summer of 2025 we consulted on a Draft Development Strategy (the **DDS**). Whilst that consultation is now closed you can still see the content of what we consulted on [here](#). We are very grateful to have received over 8000 responses to the consultation. We have heard what the people of Bromsgrove have told us, we have heard what the development sector have told us and we have heard what a wide range of other public and private sector stakeholders have told us. We are listening, and whilst we won't be able to satisfy all the wishes of a very diverse set of respondents our job is to as best as possible balance all of those competing wishes to produce a plan for Bromsgrove which provides certainty on how the district will develop in the years up to 2044. We have produced consultation summaries which can be view [here](#).

In summary this is what you told us

Infrastructure Capacity and Delivery

- Schools are already at or near full capacity
- GP surgeries are oversubscribed with long waiting times
- Public utilities such as drainage, wastewater, electricity are under pressure
- Our open spaces, sports and community facilities are under pressure.

Transport and Highway Constraints

- There is severe congestion on key corridors such as the A38, A456, A491, A435
- Narrow rural roads and unsafe junctions cannot cope with new development
- There is peak-time gridlock in various locations across the district
- There are parking shortages and walking and cycling accessibility issues

Scale and Distribution of Growth

- Some sites are disproportionately large relative to settlement size, particularly in villages
- Development is likely to change settlement character and identity
- Cumulative impact of growth is a big risk to development, especially development in other local authority areas
- More development and living opportunities are needed in the Town Centre
- There needs to be more job opportunities to go with all the housing
- Local residents need more affordable housing

Green Belt and Settlement Identity

- There are concerns about:
 - Loss of Green Belt openness
 - Coalescence between settlements
 - Urban sprawl into rural areas
 - Erosion of village identity

Environmental and Flood Risk Constraints

- There are concerns about:
 - Surface water flooding and known flood hotspots
 - Loss of habitats and wildlife corridors
 - Unmodelled watercourses increasing uncertainty

Deliverability and Evidence Gaps

- The evidence base needs to be updated / completed (housing need, Green Belt, transport etc.)
- There is uncertainty around infrastructure delivery and funding
- There are multiple technical constraints affecting sites

So what are we going to do about this?

The Council wants to prepare a plan which successfully deals with the issues you have told us about. We want to make sure that new development will only happen where it can be supported by necessary new infrastructure: new or improved schools and local healthcare facilities will be provided, roads and junctions are improved and new public transport is provided.

How are we going to do this?

We will do this by progressing your local plan to adoption so we can use it to shape development. The next stage in that process is this scoping report and making sure we take this opportunity to get the scope of the plan correct.

Bringing all of this together we have identified a new list of priorities and challenges which is in response to the issues that you have asked to address

Question 1:

1a. have we got this right, are these the issues that matter to you,

Yes/ No / Unsure

1b. are there any key challenges and priorities that you would add to this list?

1. Community Infrastructure Provision and Capacity

- Ensure sufficient infrastructure to support growth, including:
 - GP surgeries and healthcare provision
 - Additional School places and facilities
 - Utilities and community facilities
- Coordinate development with infrastructure delivery to ensure sustainable communities.

2. Transport and Accessibility infrastructure

- Promote sustainable travel by improving infrastructure for:
 - Walking and cycling
 - Public transport use
- Ensure the transport network can accommodate growth, including:
 - Addressing congestion, particularly on the A roads and key local routes

- Mitigating cumulative traffic impacts from development, including in smaller settlements and edge-of-conurbation locations
- Improved access to and facilities at railway stations, including parking provision

3. Housing Growth

- Meet the District's housing requirements to 2044, ensuring a deliverable supply of land.
- Provide a mix of housing types, including dedicated affordable housing, homes for older people, and smaller, more attainable dwellings.
- Maintain balanced and sustainable communities, addressing affordability and reducing the outward migration of young people.
- Ensure new development delivers meaningful local benefits, including effective use of Section 106 contributions.

4. Economy and Employment

- Provide sufficient land and opportunities for employment growth.
- Support existing businesses, including agriculture and rural enterprises.
- Encourage economic diversification (e.g. high-tech, green industries, farm diversification).
- Attract inward investment and reduce outward commuting.
- Recognise and support homeworking, including addressing rural broadband limitations.

5. Town Centres, Local Centres and Settlements

- Support the regeneration of Bromsgrove Town Centre.
- Support district wide local centres.
- Maintain the vitality and viability of smaller villages and rural settlements.

6. Environment, Climate and Landscape

- Protect and enhance the natural environment, including:
 - Key landscapes
 - Biodiversity and geodiversity
- Address climate change by:
 - Reducing carbon emissions
 - Supporting renewable energy
- Manage water resources and address flood risk, ensuring development:
 - Avoid high-risk areas where possible
 - Mitigate impacts on-site and wider areas
- Recognise the District's role as custodian of the environment for future generations.

7. Design, Heritage and Place Quality

- Preserve and celebrate the District's historic environment and local distinctiveness.
- Ensure development respects landscape character and settlement identity.
- Deliver high-quality, safe, and secure built environments supported by appropriate infrastructure.

8. Green Infrastructure, Health and Wellbeing

- Promote healthy communities through:
 - Protection and enhancement of Green and Blue Infrastructure
 - Provision of open space and leisure facilities
 - Where possible avoiding the loss of leisure facilities.
- Manage impacts on health and wellbeing, including issues such as the concentration of hot food outlets.

9. Community Engagement and Local Involvement

- Ensure local communities are actively involved in shaping the future of their areas.
- Strengthen community influence in planning decisions and development outcomes.

Section 2 - Introduction, overview of plan-making to date and how to respond

Introduction

Bromsgrove District Council is in the process of reviewing and replacing the adopted Bromsgrove District Plan (2011–2030, adopted January 2017). To date the Council has held three consultations relating to the new Bromsgrove District Local Plan:

- Issues and Options consultation (24th September – 19th November 2018)
- Further Strategic Issues consultation (30th September – 11th November 2019), and
- Draft Development Strategy consultation (30th June – 20th October 2025).

The emerging Bromsgrove District Local Plan will be produced as a new style local plan under the Levelling-up Regeneration Act 2023. The Plan will be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2026, which came into force on 25th March 2026, and the Planning and Compulsory Purchase Act 2004 (as amended). In addition, the Plan will respond to the changes to the planning system through the proposed updates to the National Planning Policy Framework (NPPF), published for consultation in December 2025. In light of preparing the Local Plan under the new plan-making system, the Plan will be prepared and adopted within 30 months once it passes through what is known as ‘Gateway 1’.

The scoping consultation is the first consultation in the preparation of the Local Plan under the new plan-making system. In summary, the Council is required to invite representations about such matters relevant to the preparation of the Local Plan, including what the Plan should contain, and how the Council should engage with stakeholders in the preparation of it. The consultation is open for comments from **24th July to 4th September** (consultation responses received after the deadline will not be considered, but please note there will be a number of further consultations as the plan progresses towards adoption).

The scoping consultation follows the publication of the Local Plan timetable and the notice of intention to commence local plan preparation on 29th June 2026, both of which can be viewed on our website – [INSERT WEBLINK](#).

Although the Council is preparing a new Local Plan under a new plan-making system, the work to date on the emerging Local Plan, including the three previous consultations under the old plan-making system, will help and feed into the preparation of the Local Plan under the new plan-making system. Under the new plan-making system the Council is legally required to follow the process set by the new regulations from start to finish. This does not mean that we cannot use the work already undertaken on the legacy plan-making system.

In particular, your previous comments will continue to shape the Local Plan. We will of course continue to take into account the comments you sent us last summer, so please don't

feel that you have to repeat anything you have said already. Responses to this consultation should be limited to the purposes of this scoping consultation and the question set out in this document. This consultation does not address site-specific matters.

Purpose of a local plan and why we need a new local plan

The purpose of a Local Plan is to provide a clear, place-based framework for how land is used and developed in Bromsgrove District over a typically 15–20 year period. Its key purposes are as follows:

- Setting the vision and strategy for development
- Allocating land for development
- Helping guide decision-making
- Promoting sustainable development and setting the approach to protecting and enhancing the environment
- Providing certainty for communities and developers
- Enabling infrastructure delivery and coordination

The Bromsgrove District Local Plan will only cover local plan matters. It will not address minerals and waste planning. Worcestershire County Council is responsible for the preparation of planning policy for minerals and waste development in Worcestershire.

The currently adopted Bromsgrove District Plan runs until 2030 but was adopted subject to the caveat that we needed to carry out an early review in order to sufficiently meet the district's housing needs for the whole of the Plan period. This is because when we adopted the plan we were only able to find a portion of our housing requirement on land not classified as Green Belt. As Bromsgrove District is predominantly rural with approximately 89% of the land designated as Green Belt, it meant we needed to undertake a lengthy and rigorous review of our Green Belt, which wasn't something that could be dealt with during the last plan-making period. Furthermore, since we adopted the Plan, it has become a requirement of the NPPF that Councils review their Plans at least once every five years. This is to ensure that they are relevant and based on up-to-date information, and to update them if this is not the case. It is also a requirement that Plans look ahead for a minimum of 15 years from adoption, therefore we need to consider development requirements beyond the 2030 Plan period. At this point in time a Plan review is no longer adequate, and as such, we will need to consider development requirements to 2044. Therefore, we are preparing a new Plan rather than just reviewing the adopted Plan.

Overview of new plan-making system

One of the Government's ambitions is to drive local plans to adoption as quickly as possible in order to achieve universal plan coverage across the Country and to ensure that plans contribute positively to the Government's Plan for Change milestone of building 1.5 million new homes in England by the end of this Parliament.

In March 2026, the Government introduced the new plan-making regulations – the Town and Country Planning (Local Planning) (England) Regulations 2026 - implementing the planning reforms introduced by the Levelling-up and Regeneration Act 2023. The new regulations target a faster, streamlined and more digitised plan-making system. Local planning authorities have 30 months to adopt a local plan once they have passed through what is known as ‘Gateway 1’, which is where the Council publishes its ‘self-assessment summary’).

An overview of the new-plan making process is provided in Figures 1 and 2 below.



Figure 1: Illustration of the main stages and timings in the 30-month process (Source: GOV.UK <https://www.gov.uk/guidance/30-month-local-plan-process-an-overview>)



Figure 2: Overview of the new local plan-making process (Source: GOV.UK <https://www.gov.uk/government/publications/plan-making-regulations-explainer/plan-making-regulations-explainer>)

Prior to the commencement of the formal 30-month period is the 'getting ready' phase. This is a minimum 4-month period where local planning authorities must publish a notice of intention to commence local plan preparation, publish their local plan timetable and undertake a scoping consultation (details of what this consultation is about is included at section 1.7). Local planning authorities then prepare and publish their Gateway 1 self-assessment summary.

Publication of the Gateway 1 self-assessment summary commences the formal 30-month period whereby the local plan is prepared, independently examined and adopted. The new local plan-making system allows for two more consultations after the initial scoping consultation (i.e. this document); the proposed local plan content and evidence consultation; and finally, the proposed local plan consultation (prior to submission of the proposed local plan for independent examination).

There are also two more Gateways whereby the draft local plan is assessed by a Planning Inspector appointed by the Secretary of State. These are: Gateway 2, which occurs (after the proposed local plan content and evidence consultation, when an Inspector will provide observations and advice designed to ensure progress on the local plan is heading in the right direction; and Gateway 3, where further observations and advice is sought the proposed local plan consultation and prior to independent examination. This is to ensure the local plan is ready to be submitted for independent examination. If the local plan is found 'sound' at examination and it is recommended that the plan is adopted, the local planning authority may then decide to adopt it.

Overview of plan-making to date

As part of our early review of the adopted Bromsgrove District Plan, we undertook an Issues and Options consultation in late 2018 which was an opportunity to check that we were thinking about the right issues to address through an updated Plan. This was followed up 12 months later with a Further Strategic Issues Consultation, which outlined the next steps towards developing a potential strategy and accompanying policies. At the same time, we put out a Call for Sites request in order for developers and landowners to submit development sites to us for our consideration for allocation.

Between 30th June and 20th October 2025, the Council consulted on our Draft Development Strategy (the **DDS**). In the absence of the new plan-making system legislation and guidance, the Council decided to consult on the work undertaken at that time on the new Local Plan to stand us in good stead going into the new system. The consultation was carried out under Regulation 18 of the old plan-making system. We wanted to gather valuable information, including local knowledge and specific guidance from stakeholders, to inform the plan-making process. The consultation allowed comments to be submitted on the potential vision for the Local Plan; the draft development strategy; infrastructure provision; potential housing sites to meet the District's calculated local housing need; other sites not included for potential allocation; employment scenarios; and the Council's evidence base prepared at

that time. As set out above, the responses you submitted to the consultation are vital and will help shape the Local Plan at later stages.

Purpose of the scoping consultation and how to respond

The purpose of the scoping consultation is to allow consultation bodies, the public and other stakeholders the opportunity to have their say as to what the Local Plan should contain and what the consultation and engagement strategy should be as we progress the Local Plan through future consultations to adoption, in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2026.

At this scoping stage, we are seeking views on

- the key priorities/challenges facing the District;
- the Local Plan's vision;
- the potential scope of locally specific topic-based policies;
- the evidence base required to support the Local Plan; and
- the proposed consultation and engagement strategy.

The following sections will explore these areas further. **At the bottom of some of the sections there are questions in green boxes to help shape your response and provide meaningful feedback for the Council to use as we progress the Local Plan.**

The scoping consultation is focusing on the scope/parameters of the Local Plan, not proposals such as identifying development sites or drafting planning policies. The opportunity to comment on such matters will be the focus of future consultations.

Responses, including the request to be notified at a specified time*, must be submitted in writing by 4th September 2026 in one of the following ways:

- Online – [Smart Survey link from our website](#)
- By email – bromsgroveplan@bromsgroveandredditch.gov.uk
- By post – Strategic Planning, Bromsgrove District Council, Parkside, Market Street, Bromsgrove, Worcestershire, B61 8DA

Consultation responses received after the deadline will not be considered.

*Responses may be accompanied by a request to be notified at a specified address when one or more of the following steps occur:

Table 1: Stages where stakeholders can be notified if requested

i.	Consultation on proposed Local Plan content and evidence (Regulation 23).
ii.	Publication of observations or advice received on the Local Plan from a person appointed by the Secretary of State (Section 15CA of the Act).
iii.	Consultation on the proposed Local Plan submission documents (Regulation 27).
iv.	Submission of the proposed Local Plan to the Secretary of State for independent examination (Section 15D of the Act).
v.	Publication of the date, time, and place of the examination hearing and the name of the examiner (Regulation 35).
vi.	Decision of the examiner that the examination is to be paused for further work to be carried out (Sections 15D and 15DA of the Act).
vii.	Publication of the document and any evidence which is sent to the examiner (Section 15DA of the Act).
viii.	Publication of the recommendations and reasons of the examiner received (Section 15D or Section 15DA of the Act).
ix.	Adoption or approval of the Local Plan (Part 2 of the Act).

If you have requested to be notified when one or more of the above steps occur, or you previously signed up to be included on our consultation database and no longer wish to be notified, please contact the Strategic Planning team by email at bromsgroveplan@bromsgroveandredditch.gov.uk.

Section 3 Spatial portrait of Bromsgrove District

District overview

Bromsgrove District is situated within the north of Worcestershire County, directly south of the West Midlands Conurbation. Bromsgrove Town is approximately 14 miles from Birmingham city centre. The District has a land area of approximately 21,714 hectares, 89% of which is designated as Green Belt.

The District comprises a single large town of Bromsgrove with other larger population centres including Alvechurch, Barnt Green, Catshill, Hagley, Rubery, and Wythall. The remainder of the district is predominantly rural in character with several small villages and hamlets. The District is spanned by multiple motorways with the M5 running north/south and the M42 east/west. The M5 and M42 connect with the M6 to the north of Birmingham and the M40 to the east. The District also benefits from train and bus connections into Birmingham City Centre and the wider region from many of the larger settlements.

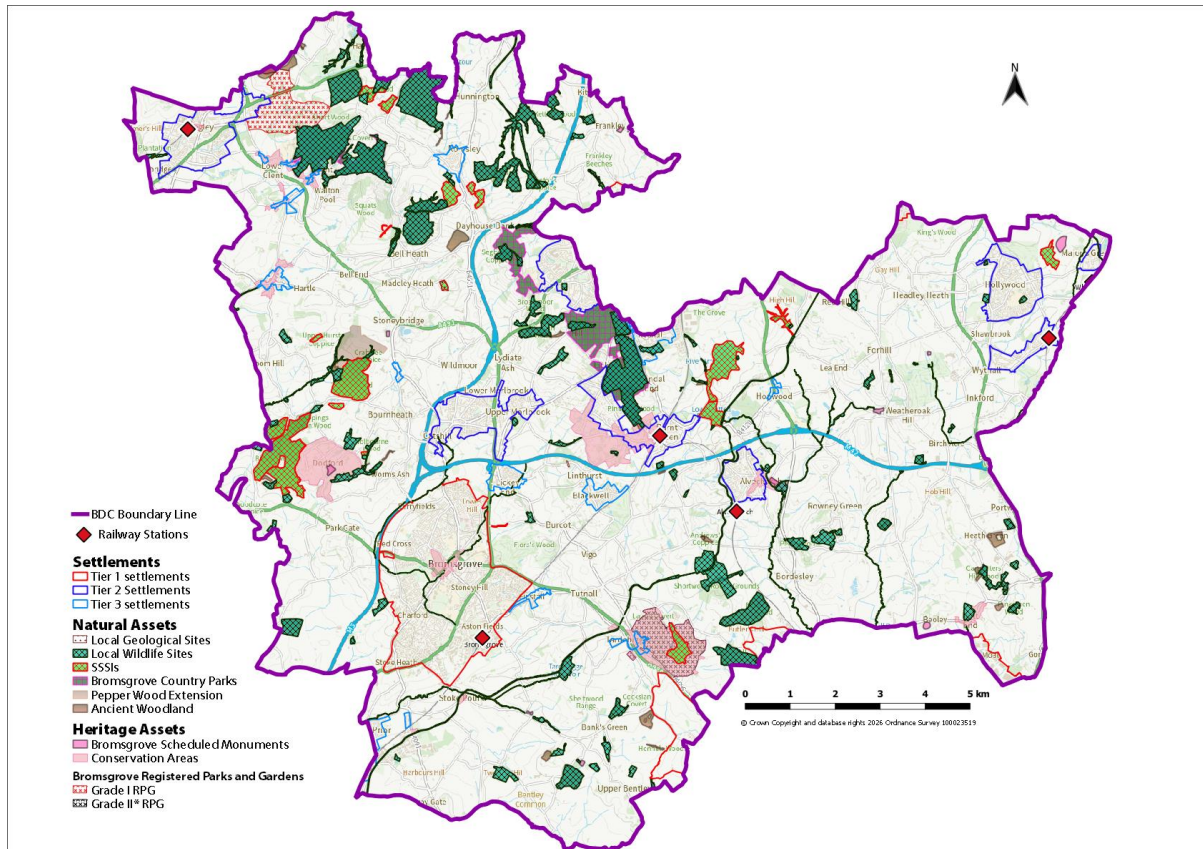


Figure 3: Bromsgrove District overview map showing settlements and a selection of planning constraints

Social characteristics

The total population of Bromsgrove District is 101,685 ([ONS mid-year estimates 2024](#)). This comprises 49,769 males and 51,916 females. As of the 2021 census¹, 58.7% of people are aged between 16 and 64, compared to 61.8% for the West Midlands and 62.8% nationally. 22.9% of residents are aged 65 and over, a higher proportion than nationally (18.6%) and the West Midlands (18.8%).

Index of Multiple Deprivation

The Index of Multiple Deprivation (IMD) ranks census Lower Super Output Areas (LSOAs) by their relative deprivation across several domains². A higher rank / score indicates lower levels of deprivation for each domain. When the scores of LSOAs within Bromsgrove are

¹ [Nomis - 2021 Census Area Profile - Bromsgrove Local Authority](#)

² [English indices of deprivation 2025: statistical release - GOV.UK](#)

combined, the District is shown to be less deprived overall than 90% of the 296 Local Authority Districts in England.

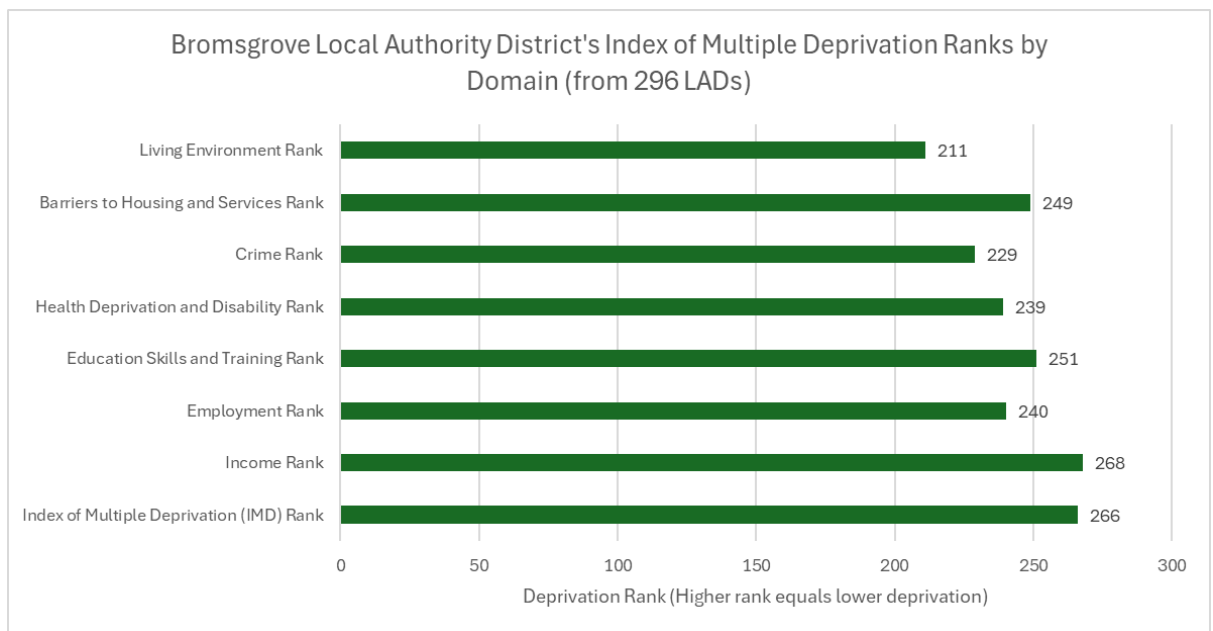


Figure 4: Bromsgrove District's Index of Multiple Deprivation Ranks

Whilst the overall rank shown in figure 4 is useful for showing how Bromsgrove District compares to other Local Authorities, the decile individual LSOAs fall in to can show the relative affluence of areas across the District. As shown in figure 5, Bromsgrove contains no LSOAs within the most deprived decile (1), and 18 within the least deprived.

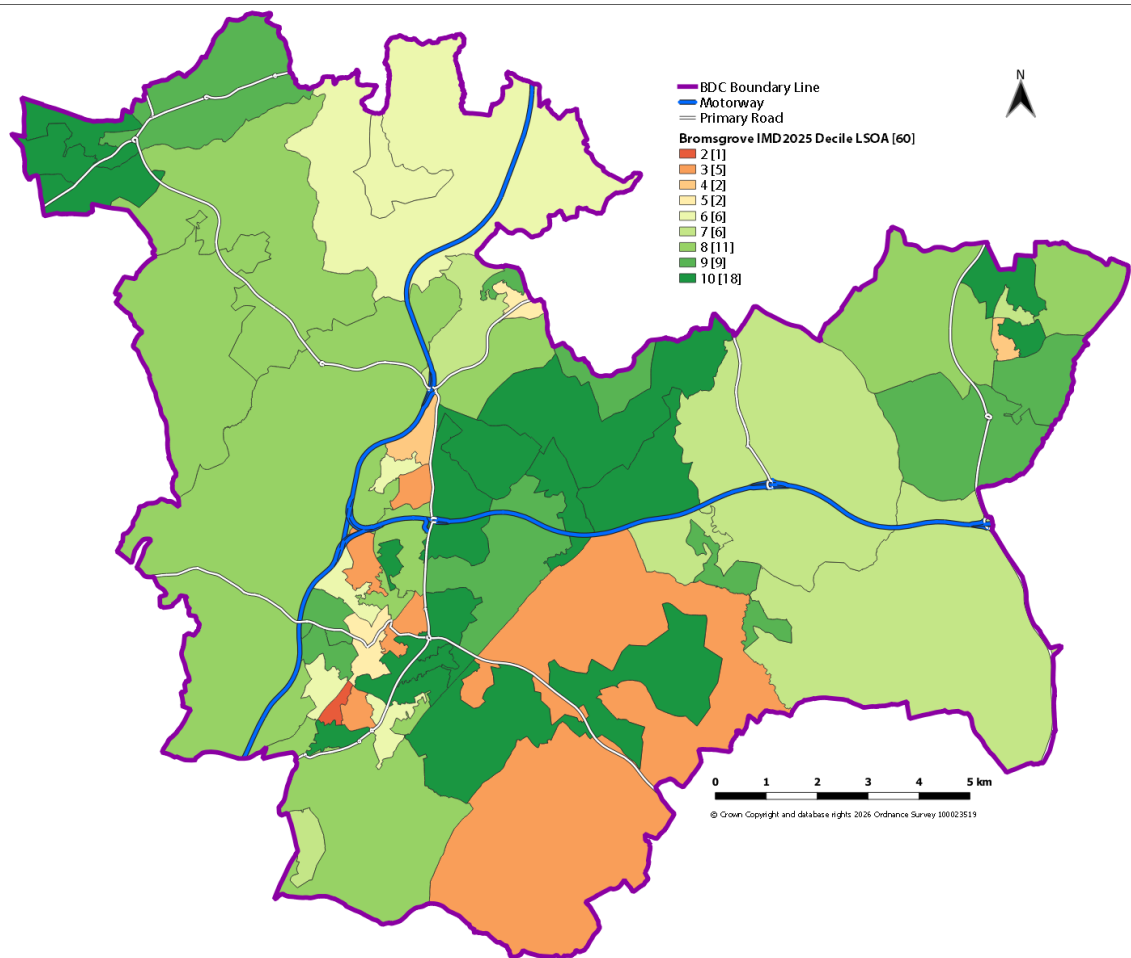


Figure 5: Spatial overview of Bromsgrove District's Index of Multiple Deprivation Ranks

Economic characteristics

As of the latest census, 58.3% of people aged 16 and over living in the District are in employment (including full-time students), 21.1% are retired 2.7% long-term sick or disabled, 3.2% looking after home or family and 2.3% are economically inactive. Of those in employment 70.4% work full-time (31 or more hours)³.

Median annual earnings of people who work within the District is £27,494 compared with the median annual earnings for residents of Bromsgrove District, which is £36,409, a difference of 27.9%⁴. This would suggest that the District's working population earn higher salaries than the national median (£32,890), and the West Midlands (£31,345) but they earn them in employment locations outside the District. Due to Bromsgrove's proximity to the West Midlands Conurbation, many residents commute to jobs in and around Birmingham.

Travel

Of those 16 and over in employment, 34.8% work mainly from home, 25.7% travel less than 10km, 22.7% travel between 10km and 30km and 3.3% travel greater than 30km⁵. The most

³ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics](#)

⁴ [Nomis - 2021 Census Area Profile - Bromsgrove Local Authority - Economic Activity](#)

⁵ [Distance travelled to work - Census Maps, ONS](#)

common method of travel to work is by car with 53.3% driving and 3.2% as a passenger, 1.4% travel by train and 0.8% by bus. 4.6% walk to work and 0.6% cycle⁶.

Housing

The latest census (2021) records 41,264 households within Bromsgrove District, of which 42.4% are owned outright, 36.3% mortgaged, loan or shared ownership, 10.7% social rent and 10.7% private rent. The average house price in Bromsgrove District was £328,000 as of March 2026, significantly higher than the average for the West Midlands (246,000). First-time buyers in the District paid £254,000 on average in March 2026. The average monthly rent stood at £979, in line with the West Midlands average of £964⁷.

The dwelling type mix is predominantly family homes, with 38.1% of existing stock detached, 36.1% semi-detached, 14.2% of stock is terraced, 8.8% are flats or tenements with 2.8% as other⁸.

Environmental characteristics

Natural Environment and Landscape

Bromsgrove District is predominantly rural in character, away from the more built-up areas around Bromsgrove Town, it is characterised by a settlement pattern of farmsteads and wayside dwellings with the occasional village.

The District contains 4 Country Parks including the Clent Hills and Lickey Hills, 13 Sites of Special Scientific Interest and 90 local sites (85 ecological and 5 geological) as well as 538 hectares of Ancient Woodland.

Historic Environment

The historic landscape in terms of field boundaries, including some post medieval enclosure, has survived in many areas. There are 493 Listed Buildings and 13 Scheduled Ancient Monuments.

The Listed Buildings range from the Grade I listed Hagley Hall and St John's Church in Bromsgrove, through a variety of rural buildings including two windmills, to a 1950s house in Hopwood. There are also 12 Conservation Areas that are designated as being of special architectural or historic interest and 2 Registered Historic Parks and Gardens. The Conservation Areas vary greatly in their character. The majority are centred around villages such as Alvechurch and Belbroughton, which date back to at least medieval times, as well as Bromsgrove Town Centre. The more unusual Conservation Areas include a stretch of the Worcester and Birmingham Canal and the Chartist settlement at Dodford. The Canal Conservation Area includes the Tardebigge Flight (as mentioned above) of 30 locks, which are all listed. The Dodford Conservation Area is centred on the planned Chartist settlement developed in the 1840s and originally comprised 39 cottages on 4-acre plots.

⁶ [Method of travel to workplace - Census Maps, ONS](#)

⁷ https://www.ons.gov.uk/visualisations/housingpriceslocal/E07000234/#house_price

⁸ [Accommodation type - Census Maps, ONS](#)

Section 4 - Vision and objectives

What is a Local Plan vision?

The vision for Bromsgrove District will underpin the Local Plan and will describe how Bromsgrove District should grow, change and what it will look like by 2044. Additionally, it has a role to address the challenges above and will be central to the delivery of the Council's wider Strategic Purposes.

Local Plan period

Based on the current Local Plan timetable, the Plan will set out the vision for growth and development of the District to 2044. New national legislation requires that Local Plans are reviewed regularly within this period to ensure that the policies set out in the Plan remain relevant and up to date.

Feedback on the comments received from the DDS consultation relating to the Local Plan vision

The DDS consultation of Summer 2025 posed questions on the vision for the future of Bromsgrove District contained within the Local Plan.

Residents and other stakeholders were first asked whether the plan should be based on the Council vision, which is set out in the Council Plan 2024-2027, and which says that

'We aspire to create a welcoming environment that prioritises quality of life, where residents and businesses feel a deep sense of belonging and connection'

or whether the Local Plan should contain a separate Local Plan vision. 58% of responses were in favour of developing a separate vision for the Local Plan. 25% of responses supported adopting the Council's vision, with the remaining respondents unsure.

It is therefore our understanding that the majority of respondents would like the Local Plan to contain a distinct, Local Plan-specific vision rather than simply adopting the Council vision set out above.

Residents and stakeholders were then asked to provide comments on changes they would like to see made to the Council vision. Key themes from the responses are presented below:

Clear and Actionable

There was a strong perception that the Council vision may be too vague for the purposes of a Local Plan. Additionally, that the Council vision may be outdated by the time the Plan could be adopted.

Infrastructure

Infrastructure provision, such as healthcare capacity, school capacity, public utilities and public transport are seen as the key issues for Bromsgrove District and should therefore underpin the Local Plan vision and objectives.

Environment

The Local Plan vision must prioritise environmental protection much more explicitly than the Council vision, with clear objectives and measurable outcomes.

Strong preference for:

- Brownfield-first development
- On site biodiversity net gain
- Stronger environmental commitments

Housing

The Local Plan vision should better justify and balance growth. There was concern around the scale of growth and the potential overdevelopment of villages. Another major concern appeared to be lack of affordability of housing within Bromsgrove District.

Therefore, it was suggested that the Local Plan vision should include some smaller, distributed developments and ensure the inclusion of greater amounts of elderly housing and affordable housing.

Developing a vision for Bromsgrove District

The aim of developing a specific vision for the Bromsgrove District Local Plan aligns with the [latest National guidance for Local Plan vision statements](#). Specifically:

- a. A Local Plan vision should 'set out key aims and objectives for your area over the next 15 years or longer'.
- b. 'be ambitious but also reflect what the local plan can realistically achieve through its policies'.
- c. The vision must identify no more than 10 measurable outcomes to help monitor progress towards the stated objectives.

Potential aims & objectives

The following suggestions for the Local Plan vision's aims and objectives are based upon the feedback received from the DDS consultation and the identification of the key challenges in section 1 above. We are interested in your views on these and any additional aims and objectives you think the vision should contain. We are also interested in your views on measurable outcomes for the Plan.

Provide the infrastructure required to support Bromsgrove District and its future growth

Ensure new development is supported by the timely delivery of transport, schools, healthcare, utilities and community infrastructure, secured through clear funding and delivery mechanisms.

Prioritise brownfield and town-centre capacity, reducing Green Belt release

Prioritise brownfield regeneration and town centre living, including reuse of underused buildings and space above shops. (It must be noted that brownfield capacity in Bromsgrove district is very limited and significant Green Belt release will still be required).

Protect and enhance biodiversity, landscape and green/blue infrastructure

Protect and enhance biodiversity and wildlife corridors, deliver measurable nature recovery (including Biodiversity Net Gain), and expand accessible green/blue infrastructure to support health and wellbeing.

Safeguard settlement identity

Require masterplanning for larger sites to embed walkable neighbourhoods, local facilities, and coherent integration with existing communities.

Improve sustainable transport choices to reduce congestion

Reduce congestion and improve safety by focusing growth in the most accessible locations, strengthening public transport and delivering coherent walking and cycling networks to key services and destinations.

Provide a balanced, genuinely affordable housing mix that meets local needs

Deliver the right mix of homes (size, type and tenure), with a strong focus on affordability and provision for different life stages, including older persons and accessible/lifetime homes.

Support a thriving town centre and resilient local economy

Support a resilient local economy by regenerating Bromsgrove town centre, reducing vacancies, supporting local businesses and enabling employment opportunities alongside housing growth. In addition, support existing district wide local centres.

Deliver healthy, safe, inclusive places with adequate services and facilities

Secure sufficient school places, healthcare capacity and community facilities, and protect/replace sports and leisure assets to support physical and mental wellbeing.

Question 2:

2a. Do you agree that Local Plan should contain a distinct, Local Plan-specific vision rather than utilising the Council Plan vision?

Yes/No/Unsure

2b. We would be interested to hear additional themes that you think the vision should contain.

Question 3:

3a. Do you agree with the proposed aims and objectives? Yes / No / Unsure

3b. Are there any aims and objectives that you would change, add or delete? Please explain your answer.

Section 5: Local Plan topic-based content

Potential scope of locally specific topic-based policies

The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner. It is also a material consideration in the determination of planning applications.

The current NPPF (December 2024, amended February 2025) has 17 chapters covering the following topic areas:

- Sustainable development
- Plan-making
- Decision-making
- Housing
- Economy
- Town centres
- Healthy and safe communities
- Transport
- Communications
- Effective use of land
- Design
- Green Belt
- Climate change, flooding and coastal change
- Natural environment
- Historic environment
- Minerals

In December 2025, the Government consulted on a revised NPPF⁹. It is expected that the Government will publish the final revised version this summer (2026). One of the major changes proposed is the introduction of new national decision-making policies (**NDMPs**). The more 'rules-based' NPPF approach is to support more timely and consistent planning across local planning authorities in England. The draft version includes policies within the following policy areas:

- Sustainable development
- Climate change
- Housing
- Economy
- Town centres

⁹ [National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK](#)

- Communications
- Energy and water
- Minerals
- Effective use of land
- Green Belt
- Design
- Transport
- Healthy communities
- Pollution, public protection and security
- Flood risk and coastal change
- Natural environment
- Historic environment

The draft version of the NPPF stipulates that local plans should not duplicate, substantively restate or modify the content of NDMPs unless directed by other policies in the Framework.

This means that the role and content of local plans may change. However, the final version of the NPPF is yet to be published so the final form and policies are not known. The Council will consider the final version of the NPPF once published and it will be reflected in the next local plan content and evidence consultation.

New-style local plans will be shorter and more streamlined than local plans under the old plan-making system. Supported by an appropriate evidence base and feedback from consultations, the new Bromsgrove District Local Plan will likely include the following:

- Vision and measurable outcomes.
- Spatial strategy with policies for the amount of development to be provided, land allocations and designations (including land to be protected or enhanced for specific purposes).
- Infrastructure provision and contributions to support the delivery of the Local Plan.
- Other local topic-based policies.

Notwithstanding any proposed changes to the NPPF, the Local Plan could contain policies in the following topic areas (not exhaustive):

- Housing – e.g. housing requirement, housing allocations, housing size, type and tenure, gypsies, travellers and travelling showpeople.
- Economy – e.g. employment land requirement, employment allocations, protection of existing employment areas, rural economy, town centre, local centres.
- Environment and climate change – e.g. natural environment, historic environment, Green Belt, climate change, energy, water, flood risk, air quality.

- Transport – e.g. sustainable development, active travel, highway impact/safety and mitigation, parking standards.
- Health and wellbeing – e.g. open space, sport and recreational facilities, green infrastructure, services and facilities, health, hot food takeaways.
- Design.
- Site allocation policies.

Following the conclusion of the scoping consultation, consideration of feedback received and publication of the forthcoming revised NPPF, the Council will consider the policies that should be contained in the Local Plan. There will be opportunities to comment on the policies at the next local plan content and evidence consultation and also the proposed local plan consultation.

Question 4:

4a. Do you agree with the possible content of the Bromsgrove District Local Plan
Yes/No/Unsure

4b. is there anything you would change, add or delete?

Question 5:

5a. Do you agree with the topic-based policies that the Bromsgrove District Local Plan could contain

5b. is there anything you would change, add or delete?

Section 6: Local Plan evidence base

Likely evidence base to support the Local Plan

The Council has commenced work on the evidence base to support the preparation of the Local Plan. We understand that some of the evidence base documents prepared to support the emerging Local Plan require updating/additional work. Additionally, we will need to assess our evidence base to identify what new evidence is required.

Whilst the Local Plan is being prepared under the new plan-making system, much of the evidence base prepared to date is relevant and can be used to inform the Local Plan.

Table 2 below lists the evidence base prepared to date, the evidence currently being prepared, and evidence that requires updating or new evidence. The evidence prepared to date is available on our website – [INSERT WEBLINK](#). New or updated evidence will not be published until it is complete or at the time of the next consultation. As we continue to prepare the Local Plan, it may be necessary to prepare or commission some additional evidence.

Table 2: Evidence to support the Local Plan

Evidence Documents
Sustainability Appraisals (including SEA) accompanying various Local Plan consultations
Site Assessment and Site Selection Methodology
Green Belt Purposes Assessment (Part 1)
Green Belt Study (Part 2)
Green Belt Exceptional Circumstances Paper
Landscape Sensitivity Assessment
Strategic Transport Assessment
Settlement Hierarchy Review
Housing and Economic Development Needs Assessment (HEDNA)
Employment Land Provision
Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA)
Open Space Study
Playing Pitch and Outdoor Sports Strategy
Level 1 Strategic Flood Risk Assessment
Grey Belt Assessment

Viability Assessment
Infrastructure Delivery Plan
Housing Land Supply Evidence
Town Centres, Local Centres and Retail Assessment
Level 2 Strategic Flood Risk Assessment
Water Cycle Strategy
Climate Change and Energy Assessment
Health Impact Assessment
Habitats Regulations Assessment
Green Infrastructure, Ecology and Biodiversity Assessment
Heritage Impact Assessment

Strategic Environmental Assessment (SEA) requirements

The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (Strategic Environmental Assessment (SEA) Regulations) apply to local plans. In summary, the SEA assesses the likely significant environmental effects of a local plan alongside reasonable alternatives. Its purpose is to guide and shape plan-making, preventing or reducing adverse environmental impacts and enhancing opportunities for positive outcomes. The process takes place during the preparation of the plan.

Through powers contained in the Levelling-up and Regeneration Act 2023, a new domestic framework for environmental assessment is being developed. The SEA process will be replaced by Environmental Outcomes Reports. The Government is expected to introduce Environmental Outcomes Reports by the end of 2027. Until Environmental Outcomes Reports are introduced the current SEA regulations apply. The transitional approach from SEAs to Environmental Outcomes Reports is not yet known.

A sustainability appraisal considers the local plan's wider economic and social effects (and can also consider potential environmental impacts) to promote sustainable development. A sustainability appraisal should also meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). A SEA is not required if the sustainability appraisal meets all of the requirements of the aforementioned regulations and considers environmental impacts. Guidance released by the Government in relation to the new plan-making system only makes reference to SEAs and therefore it is our understanding that the requirement to carry out a sustainability appraisal has been removed. More detailed SEA guidance is expected in due course.

The Council has prepared a SEA Screening Statement, which can be viewed on our website ([INSERT WEBLINK](#)) and alongside hard-copy versions of this scoping document across the District (see section 8). The SEA Screening Statement concludes that the new Local Plan has the potential to have a significant effect on the natural environment and will require a

SEA to be undertaken. It is anticipated that the scope of the SEA will be consulted on at the proposed local plan content and evidence consultation stage.

For past consultations, the Council has prepared a sustainability appraisal appraising the environmental, social and economic performance of the Local Plan and any reasonable alternatives at that stage. The preparation of the Bromsgrove District Local Plan, under the new plan-making system, will be informed by the SEA process.

Question 6

6a. Do you agree with the scope of the proposed evidence base to support the Local Plan (table 2)

Yes/No/Unsure

6b. is there any other evidence you feel we need to inform our Local Plan?

Section 7: Consultation and engagement strategy

Consultation principles

The consultation principles below are to help shape consultation methods:

Helping produce effective consultation responses: To comply with the timescales of the new-style plan-making system, the Council will encourage focused consultee responses. The Council will help guide consultees as to what are and aren't material planning considerations where possible to ensure highly effective responses that benefit both the Council and consultees.

Continue to provide clear, concise professionally produced consultation materials: Ensuring consultee understanding of (a) proposals and (b) the wider plan-making system by using minimal plan-making 'jargon'.

Focused consultation questions to produce a deeper level of consultation. For the DDS consultation, the Council asked consultees to provide responses which identified specific constraints in settlements, such as around education, health and infrastructure. The purpose of this is to (a) help shape the evidence base (b) help rigorously test proposed sites and (c) help shape development where a site progresses.

Ensuring consultation events are accessible to the whole District: Consultation methods must reflect the range of settlement sizes in the District. As with the DDS consultation, future events should encompass Bromsgrove town, larger settlements, rural areas and the edge of the West Midlands conurbation.

Take meaningful steps to engage all sections of the community:

- **Digital first methods:** This is a government requirement to help speed up plan-making. Digital-first approaches also reflect the fact that residents spend more time online and help to reach younger residents. Complementary use of the Council's website, social media and consultation platforms to drive engagement. Continuing to provide support for consultees using digital methods through a dedicated consultation inbox, phone line and events. This enables residents of all ages to become confident with digital methods of engagement. Use data (from the DDS consultation and other sources) to help define key consultation methods.
- **Physical consultation methods:** Providing inclusive consultation methods with physical copies available.

Clear post-consultation approach: Providing a 'you said, we did' approach to tell the story of how a Local Plan has evolved in response to feedback. The Council is required to prepare

and publish a summary received after each consultation (scoping consultation, proposed local plan content and evidence consultation and the proposed local plan consultation). The summary must set out who were invited to make representations, the manner by which they were invited to make representations, a summary of the main issues raised, and how the Council has had regard to those representations to date.

Consultation methods

In order to deliver on the principals identified above we have identified the following Consultation and Engagement Methods that could be utilised for future consultations:

1. Digital and Online Engagement

- Council website
- Emails to those registered on our consultation database and consultation bodies
- Social media platforms
- Specialist online consultation platform (e.g. *Commonplace*, aligned with the Government's "digital first" approach)
- Use of videos to explain proposals
- More detailed and accessible online FAQs
- Online questionnaires and surveys

2. Printed and Physical Materials

- Documents available at the Council's offices at Parkside and libraries across the District
- Printed letters
- Posters and display screens
- Leaflets and local magazines
- Increased availability of paper copies of consultation documents

3. Events and Face-to-Face Engagement

- Public drop-in sessions for future statutory consultation events.
- Focus groups (including targeted stakeholder groups such as Parish Councils, Local businesses and employers, community and physical infrastructure providers)
- School and college engagement sessions
- Events held at varied locations and times to maximise accessibility

4. Media and Promotion

- Local press coverage
- Council press releases
- Targeted publicity in specific areas (e.g. edge-of-conurbation locations)

- Use of Councillors, parish councils, stakeholders, and internal Council networks to promote consultations
- Leveraging existing community and stakeholder networks

5. Improving Accessibility and Participation Quality

- Making consultation documents more concise and user-friendly (e.g. greater use of graphics and visual content)
- Providing more detailed, optional supplementary questions to enable deeper engagement (e.g. on design, density, and layout)
- Ensuring consultation methods reach a wide and diverse audience

Question 7:

7a. Do you agree with the consultation principles identified?

Yes/No/Unsure

7b. What else would you suggest?

Question 8:

8a. Do you agree with the potential consultation methods identified?

Yes/No/Unsure

8b. What else would you suggest?

Question 9: Do you consider there is anything else relevant to consultation that has not been mentioned?

Section 8: Next steps and further information

Next steps

After this consultation ends **on 4th September 2026**, all feedback will be analysed and a report prepared of the outcome which will be published on our website. This feedback, along with the feedback received from previous consultations including the Draft Development Strategy consultation, will help inform the preparation of the Local Plan. It will also ensure we are engaging with you in the most effective ways for future consultations.

There will be two more opportunities to help shape the Local Plan. The next consultation is the local plan content and evidence consultation which is anticipated to be held in June 2027 for a minimum of 6 weeks. The final consultation is expected to be held in March 2028 for a minimum of 8 weeks which is a consultation on the full draft Plan before it is submitted for independent examination.

Further information

The Council's website includes all information on the Local Plan; including the Local Plan timetable, notice of intention to commence local plan preparation, scoping consultation details, evidence base, details of previous consultations held, and the privacy notice – **INSERT WEBLINK**. This will be kept up to date throughout the preparation of the Local Plan, and any updates will be published there.

Please see Section 1.7 of this document about how to respond to the consultation. If you have any queries, please contact the Strategic Planning team:

By email: bromsgroveplan@bromsgroveandredditch.gov.uk

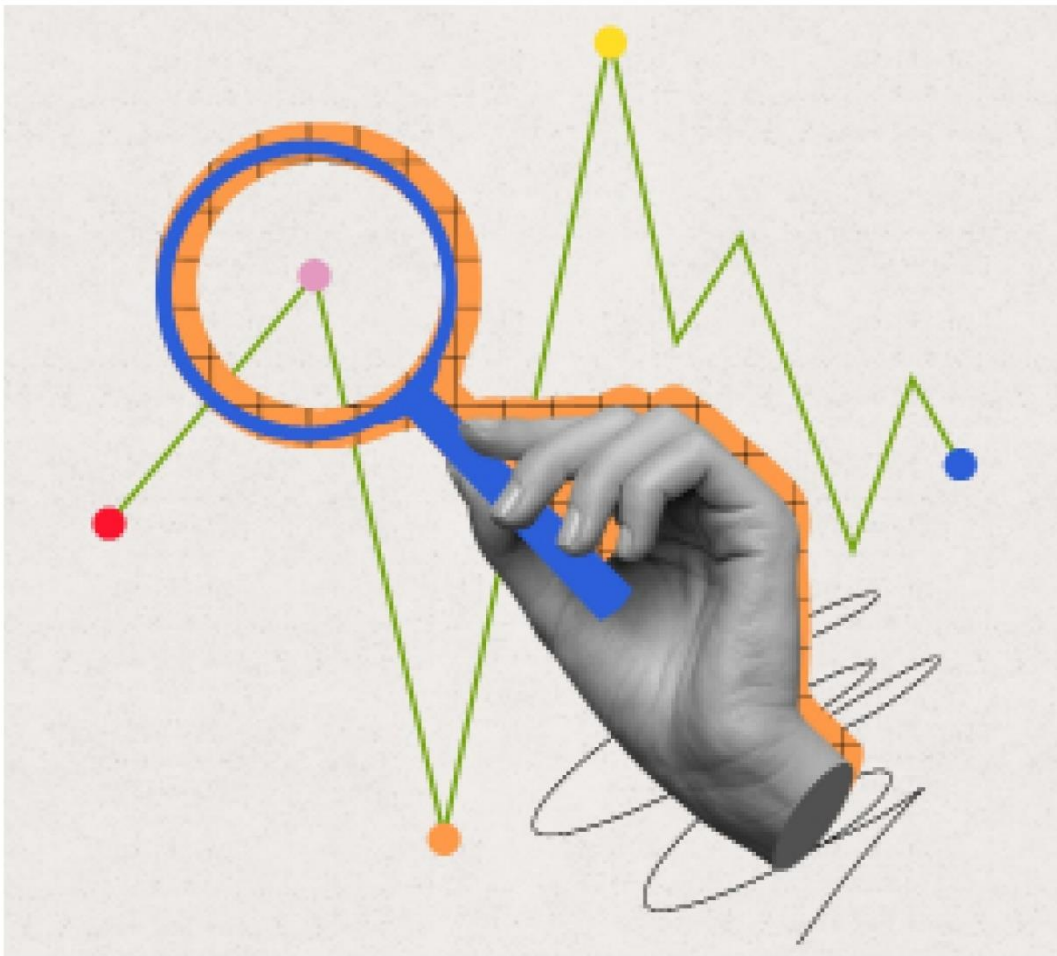
By telephone: 01527 881288

By post: Strategic Planning, Bromsgrove District Council, Parkside, Market Street, Bromsgrove, Worcestershire, B61 8DA.

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Bromsgrove District Council



Audit, Standards and Governance Committee

ANNUAL REPORT

2025 - 2026



Bromsgrove
District Council
www.bromsgrove.gov.uk

CHAIRMAN'S FOREWORD

On behalf of the Committee, I thank Councillor Harrison Warren-Clarke for his Chairmanship prior to my appointment on 14th July 2025. I took the opportunity to undertake training supplied by the Local Government Association (LGA) to understand the complexity of the role of Chairman for this very important Committee. I note that this is an apolitical meeting with duties outlined within this report. It does not appear very exciting as it relates to Audit, Standards & Governance (A, S and G) but is essential in providing Councillors, who are residents' representatives the assurance needed in audit matters and in how the Council govern the delivery of services and maintain standards.

I thank **all** the Democratic Services Officers for their support, including the interim 151 Officer Julie Lorraine, Mrs Debra Goodall and their team for continuing to progress improvements and resolution with the ongoing issues of how Value Added Tax (VAT) is managed with His Majesty's Revenue and Customs (HMRC). This matter is a complex one, given our shared service arrangement for financial matters. The draft accounts were produced in time for the period of public inspection, although further work is currently underway to improve our lines of communication with the External Auditors, which resulted in our inability to meet the backstop date of 26th February 2026 for publication of the final accounts. I thank Councillor Stephen Colella on becoming our Risk Champion and in moving forward this agenda, taking over from where Councillor Rachael Bailes left off, I thank her for her work. We have elevated the assessment of Corporate Risk to an item on the agenda befitting the significance of ensuring Corporate Risks are carefully assessed and to be assured of adequate mitigation of Corporate Risks for Council and residents. This is now supported with a live 'Risk Dashboard' for Officers and some A, S and G Members. Officers continue to develop this newly created information communication technology (ICT) support system. I thank all the Members of the Committee for their diligence and attention, given the breadth of work that the Committee undertakes.

The report this year has moved on from the period where we saw significant issues highlighted by our Auditors Annual Reports for 2020/21, 2021/22 and 2022/23. The most important of these being that we closed those accounts. The 2023/24 and 24/25 accounts are currently being Audited by Ernst and Young (EY) our new external auditors. We have had expectations these would be signed off in line with Governments "backstop requirements" on 26th February 2026. As with many Councils, there is still the requirement for clarity over previous and potential further "Disclaimed Opinions" and their knock-on effect on future years audit opinions. We continue to engage positively with EY to agree a new timeline for their work to complete on the outstanding accounts and will remain on the government's published list of councils yet to issue final audited positions until such time as that is resolved.

The Committee agreed that the requirement highlighted by the Audit Task Group in 2023 on rectification of the financial position, having these deliverables met, moved back to meeting quarterly. We now reserve the right to call additional formal meetings, if required going forward in uncertain times, as we approach Local Government Reorganisation (LGR). We continue to look to appoint an independent lay member of the Committee, which was highlighted in Councillor David Nicholl's and Councillor Harrison Warren-Clarke's previous reports to Council. We appreciate the engagement of the representative of Parish Council's, Marc Worrall, whose participation will be essential going forward. There is much to do before the change to a unitary authority takes place.

Councillor E.M.S. Gray

Chairman of the Audit, Standards and Governance Committee

MEMBERSHIP

Esther Gray (Chairman)



Bakul Kumar (Vice-Chairman)



Sam Ammar



Steve Colella



Anita Dale



Derek Forsythe



David Hopkins



Bernard McEldowney



David Nicholl



Justin Stanley

Marc Worrall (Parish
Councils' Representative)

INTRODUCTION

This report provides an overview of the Audit, Standards and Governance Committee's activities during the municipal year 2025-26.

The ultimate responsibility for Audit rests with the Portfolio Holder with responsibility for Finance and the Section 151 Officer. The Portfolio Holder is expected to attend each meeting as determined in the Council's Constitution.

During the year the Committee had considered reports and updates on the following subjects:

- Monitoring Officer's Report – details complaints and training taken place during the period between meetings.
- Updates from the Internal Audit Team.
- Updates from the External Auditors (including Backstop Report).
- General Dispositions Report.
- Annual Update Report on Regulation of Investigatory Powers Act 2000 (RIPA) Report.
- Financial Compliance Report (including updates on Statements of Accounts).
- Financial Savings Monitoring Report.
- Risk Management Report/Quarterly Risk Update.
- Risk Champion Update.
- Annual Review from the Local Government Ombudsman.
- Whistleblowing Policy update
- Capital Strategy including Treasury Management Strategy

Further information about some of the key responsibilities of the Committee are detailed within this report.

Meeting dates and minutes of the Audit, Standards and Governance Committee meetings can be found on the Bromsgrove District Council website, link detailed below:

[Browse meetings - Audit, Standards and Governance Committee](#)

The Role of The Audit, Standards And Governance Committee

Scope and Responsibility

The Audit, Standards and Governance Committee provide independent assurance to the Council in respect of:

- The effectiveness of the Council's governance arrangements
- The Annual Governance Statement
- The Review of the Annual Statement of Accounts
- Risk Management Framework and strategies
- The effectiveness of the Council's financial and non-financial performance
- Anti-Fraud arrangements
- Whistle-blowing strategies
- Internal and external audit activity
- Democratic governance

The Committee is also responsible for the Council's Standards Regime which covers both District and Parish Councils. Areas encompassed within the Standards Regime include:

- Promoting high standards of conduct by Councillors and co-opted members of Council bodies.
- Assisting Councillors and co-opted members to observe the Members' Code of Conduct.
- Advising and training Members and co-opted members in respect of the Code of Conduct.
- Formulating advice to members and officers in declarations of gifts and hospitality.
- Granting dispensations to Councillors and co-opted members from requirements relating to interests as set out in the Code of Conduct.
- Considering reports from the Monitoring Officer following investigation into complaints about elected Members.

Meetings of the Committee – 2025-2026

The Council's constitution requires the Audit, Standards and Governance Committee to hold quarterly meetings. At its meeting on 9th March 2023, the Committee agreed that it should hold six meetings per municipal year (meet bi-monthly) until issues with the submission of the outstanding Statements of Accounts had been resolved. During the meeting held on 16th January 2025, Members agreed to the recommendation that following receipt of "Disclaimer Opinions" from the External Auditors for the 2020/21 and 2021/22 Accounts, as approved at the Committee meeting on the 5th December, the subsequent "Disclaimer Opinion" of the 2022/23 Accounts on the 3rd January and the provision of the 2023/24 Accounts for Public Consultation by the 17th January 2025 as per the backstop regulations, that Audit, Standards and Governance Committee meetings revert to being quarterly in nature. In addition to these meetings members of the Audit, Standards and Governance Committee are invited to meet with the internal Auditor who provides guidance on how that work is carried out and how concerns come to them to add to their investigations. This opportunity took place on 15 December 2025 via Teams. It is considered good practice for this to continue in this vein.

Standards Regime

There are two main areas which are considered regularly in terms of the Committee's responsibility for Standards.

Monitoring Officer's Report

This covers Member Training, Member Complaints and Parish Council matters.

If the elected Member was found to have breached the Authority's Code of Conduct, the powers available to the Authority include a formal letter of warning to the Member and formal censure by motion, of a committee, for the removal of the Member from a Committee (which does not legally prevent the Councillor in question from attending), in addition to adverse publicity.

The Council's Code of Conduct is designed primarily with the view of maintaining standards through a conciliatory approach and there was a high reliance on the Monitoring Officer working in cooperation with political Group Leaders when finding resolutions to Member complaints.

It was reported through the Monitoring Officer's report that Members received training throughout the 2025-2026 municipal year. A small number of Member training sessions had been arranged for 2025/26. This reduced number of training sessions had been booked in accordance with arrangements requested by the Member Development Steering Group (MDSG). In line with the approach agreed, some of this training was delivered jointly with Redditch Borough Council, whilst other sessions were bespoke and being delivered to Bromsgrove Members only.

The MDSG had previously requested that the majority of training should be delivered in person, however, Members can opt to attend most training sessions remotely, with the link to the session provided on request. For 2026/27 the MDSG had agreed that the majority of training should be delivered remotely on the basis that this will be more convenient for Members who have work, caring or other commitments. The exceptions to this will be planning and licensing training, where members will be expected to attend the training that is provided in person.

The MDSG had also requested that Safeguarding training be arranged to be delivered prior to the end of the municipal year. Officers are currently in the process of identifying a date on which this training could be delivered.

The training included the following sessions:

- Code of Conduct Training – Thursday 8th May 2025
- BDC Member Planning Training – Monday 2nd June 2025
- Joint RBC/BDC Member Local Government Finance Training – Wednesday 25th June 2025
- Member Licensing Refresher Training – Monday 21st July 2025

The Member Development Steering Group (MDSG) had met several times throughout the municipal year. MDSG discussed the needs and adaptations required to make training relevant to Members. In addition, discussions took place regarding the Member Induction and training for the next municipal year.

The Constitution Review Working Group (CRWG) is a cross-party group where any potential changes to the Council's constitution are discussed. CRWG continued to meet during 2025-2026 and had been considering issues relating to constitutional changes that follow the Council's approval on 20th September 2023 of the hybrid Leader and Cabinet governance model, implemented from the start of 2024-25 municipal year.

Among the items of business that the group discussed during the municipal year were:

- Planning Committee Matters referred from the Council in respect of Motions on Notice.
- Council Procedures Rules in respect of Public Participation.
- Motions on Notice in respect of the Requirements in the Council Procedure Rules.
- Retention Schedule Rules in respect of the live streaming of meetings.

Member Complaints

An update on Member complaints had been provided in all Monitoring Officer's reports. It was noted that several Member complaints had been received to date in 2025-26, most of which have been resolved locally. There had also been several complaints received in respect of Parish Councillors. These continue to be investigated locally by the Monitoring Officer. There had been no investigations about Members which required a Hearings Sub-Committee to be convened.

Dispensation Report

The Audit, Standards and Governance Committee received several dispensations reports this year. The reports on Individual Member Dispensations were considered on 14th July 2025 respectively. The requests for Individual Member Dispensations detailed in those reports were granted by the Committee. The dispensations agreed at these meetings remain valid until the first meeting of the Audit, Governance and Standards Committee following the next District Council Elections in May 2027 unless amended by the Committee prior to that date.

Parish Council Involvement

The Parish Council's representative can add any item on to the agenda as required as outlined in the Committee Terms of Reference. Whilst Parish Councils can appoint two representatives on to the Committee, only one of these places was taken up. The Parish Council's Representative for the municipal year 2025-26 was Mr M. Worrall.

Investigations and Enquiries

The Independent Person, Mr Mel Nock, had continued to support the Monitoring Officer in the management of Member-to-Member complaints where necessary. The Council had considered joining the other District Councils in Worcestershire that had a retained pool of

Independent Persons. Any proposals for this would be considered by the Committee. In the meantime, Mr Nock, remains the Independent Person on an interim basis.

INTERNAL AUDIT REPORTS

During the year the Committee had continued to receive updates on the work of the Internal Audit team including details of the following completed audit reports:

- Internal Audit Plan 2025-26
- Internal Audit Annual Report 2024-25
- Internal Audit - Progress Report (every meeting).

EXTERNAL AUDITORS

On the 3rd of October 2024, the Council appointed Auditors for 2023/24 onwards Bishop Fleming notified the Council that they were resigning. The Council, following liaison with Public Sector Audit Appointments Limited (PSAA) for the appointment of alternative Auditors, confirmed that Ernst and Young (EY) would officially become the Council's External Auditors on the 24th of October 2024 and held their first onboarding meeting following the start of the municipal year on 14th July 2025.

During the year the Committee received reports and updates from Ernst and Young on the following subjects:

- Audit Update Report 2023/24

The Progress Reports were considered at each meeting of the Committee and covered a range of issues including the following:

- Signing of accounts for 2021/22 and 2022/23
- Disclaimer of opinion for 2023/24 and 2024/25
- Draft auditor report for 2024/25
- Value for Money (VFM)
- Significant Risks
- Financial Statements

Section 24 Notice

One of the legislative reporting requirements the Council had not achieved was the delivery of the 2020/21, 2021/22 and 2022/23 Statement of Accounts which resulted in the issuing of a Section 24 Statement for the Council. Following this, a review was undertaken by a Task Group of the Audit, Standards and Governance Committee. As part of its investigations, a decision was undertaken to increase the frequency of Audit Committee meetings to six times a year, until the Council rectified the situation.

Backstop Report

On 30th July 2024, the Minister of State for Local Government and English Devolution provided a written statement to Parliament confirming the Government's intention to introduce a backstop date for English local authority audits up to 2022/23 of 13th December 2024. A

backstop date for 2023/24 was proposed of 28th February 2025 and a date for 2024/25 audits of 27th February 2026.

External Auditors, Grant Thornton considered that there would be insufficient time to conclude their work in advance of the 13th December 2024 backstop deadline. On that basis the backstop for the 2020/21, 2021/22 and 2022/23 years was applied. Given that several key audit areas remained outstanding, their proposed audit reports would be issued as a disclaimer of opinion, effectively meaning Grant Thornton had been unable to gain the assurance necessary to give an audit opinion by the statutory backstop date of 27th February 2026.

During its meeting on 16th January 2025, Members agreed that following receipt of the Disclaimer Opinions for the 2020/21 and 21/22 Accounts, the subsequent Disclaimer Opinion of the 22/23 Accounts and the provision of the 2023/24 Accounts for Public Consultation that meetings revert to being quarterly in nature.

Risk Champion Updates

Following discussions held by the previous risk champion and considerations of the role and responsibilities, during a meeting held on 24th November 2025 it was announced and agreed by the Board that Councillor S.R. Colella be appointed as the new risk champion. It was also agreed that further informal discussions about the role would be discussed with the Interim Section 151 Officer and that it would be appropriate that the risk champion should be invited to attend future Corporate Risk Management Officer Group (CRMOG) meetings.

Following the request by the Chairman it was agreed that the Risk Champion update would follow the Risk Report for continuity, on each agenda. During a meeting held on 17th February 2026 the Risk Champion praised the significant improvements in risk management maturity and the introduction of the Power BI system, which would enhance transparency and oversight and would assist with the ability to fulfil the role of Risk Champion.

Below is a summary of the main matters discussed at Audit, Standards and Governance Committee in this municipal year:

14th July 2025

Annual Update Report on Regulation of Investigatory Powers Act 2000 (RIPA)

During this meeting Members were asked to consider the annual update report on the Regulation of Investigatory Powers Act 2000 (RIPA). It was explained that the Council had not used RIPA powers in recent years and that the policy was praised by inspectors and only minor updates were required.

Localism Act 2011 – Standards Regime – Dispensations

During consideration of this report the Committee considered the approval of individual Member dispensations with the following points discussed:

- Dispensations fell into four categories which included: general, council tax arrears, Member and outside body appointment dispensations. However, the report related only to individual Member and outside body appointment dispensations.

- The Committee approved a range of dispensations for Members to participate in discussions where they might otherwise have a conflict of interest.
- Members were reminded to update their dispensations as roles changed.
- It was agreed that a reminder would be issued at the next Council meeting for Members to review their dispensations.

External Audit On Boarding Discussion Update

Members welcomed the newly appointed external auditors Ernst and Young (EY) to the meeting with the following key points discussed regarding the onboarding process:

- The 2023/24 audits would result in a disclaimer of opinion due to historical issues. As part of this, exception reporting around value for money was also taking place which was expected be reported back to the Board by early Autumn prior to the sign off, of the accounts. The previous auditors Grant Thornton had issued statutory recommendations which required review also, providing additional work.
- 2024/25 audit would begin in November 2025, with a statutory deadline of 27 February 2026.

Annual Report of Internal Audit for 2024/25

This report provided the Annual Internal Audit Opinion for the financial year 2024/25, as required by the Accounts and Audit Regulations 2018 and the Public Sector Internal Audit Standards. It supported the Council's Annual Governance Statement by offering independent assurance on the adequacy and effectiveness of governance, risk management and internal control processes.

The report provided a reasonable level of independent assurance that the Council's internal controls and risk management processes were effective and supported the achievement of its strategic objectives.

The following key points were discussed:

- Three audits received limited assurance: GPC credit card usage, accounts payable and procurement with follow-up audits planned to address the issues.
- Service performance had improved significantly with planned audits delivered 93% of the planned days, compared to 58% the year before.
- Team productivity had improved from 66% to 81%.
- Internal audits were on track to achieve the 85% productivity target for 2025/26.
- Continuous improvement activities were being carried out, including an auditor skill set review, individual training and development needs to include environmental sustainability training.
- Risk of fraud was evaluated on every individual audit delivered.
- External quality assessments were carried out during the financial year, with a general conformance with the standards.
- How the Council demonstrate organisational independence was also included within the report.
- Internal audits were mostly in compliance for the new global internal audit standards for the forthcoming year which had replaced the previous public sector internal audit standards. However, a three-year audit strategy was in development.

Internal Audit Plan 2025/26

During this item the Committee considered the draft Internal Audit Plan for 2025/26 with the key points discussed:

- The plan was risk based, designed to support the Council in achieving its objectives.
- The approach to audit planning had changed with each area selected by internal audit had been discussed and agreed with SLT, following a review, which included key areas such as procurement and contract management.
- The internal audit plan was based upon a resource allocation of 250 chargeable days, which had been agreed by the Deputy Chief Executive and Chief Finance Officer.
- There was a 15-day contingency for ad hoc advice.
- Any significant amendments during the year would be reported to the Audit, Standards and Governance Committee.

Financial Compliance Report including Update on Statement of Accounts

This report set out details of delivery against key financial requirements with the following key points discussed:

- Reporting on the national indicators had been moved into appendices.
- The Council were complying with national and local requirements. The local requirements generally were delivered through the budget, which was approved on 19th February 2025, in particular with regard to the Treasury indicators.
- The Government had published a list of councils who had not complied with publishing their 2023/24 accounts in accordance with the backstop date of 28th February 2025 which included BDC. Members were advised that this was due to the Council not having external auditors at that time.
- The Council met the deadline for publishing the 2024/25 accounts.
- A financial stability plan was being developed to include the Tech One financial system, Financial Rules, Training Plan and Procurement Processes which would be reported at a future meeting.
- VAT returns were being submitted monthly; a large refund was still under negotiation at Redditch Borough Council. Some historical VAT issues remained under review, particularly around shared services with Redditch Borough Council.

Financial Savings Monitoring Report

The Committee received a report which set out the final position on the financial savings programme with the following key points considered:

- The Council ended the year with a £129k underspend, largely due to additional fleet and finance cost savings with the accounts completed and offset by investment interest, lower interest payments and additional grant income. This compared to an underspend figure of £53k reported at Quarter 3 which resulted in a £76k improvement of the Council's position.
- The largest savings was due to pension costs linked to the 23-triennial revaluation, which ran for three years.
- The position at year end 2023/24 in terms of departmental savings included two Amber risk items which required careful monitoring. The Red risk item in relation to Finance would not be delivered, with additional resources established to ensure the accounts were up to date.
- Some savings targets (e.g. planning income, parking, waste) remained at risk which could be largely impacted by LGR.

- Future savings monitoring reporting were to be reviewed and reported through the monitoring report, with considerations for this to be scrutinised under the Finance and Budget Working Group. It was agreed by the Committee that this proposition would-be discussed further with the Chairman of the Finance and Budget Working Group.
- Clarity on the overspend for Shared Services was requested by Members. It was explained that future reporting would be amended to show the overspend for individual services.

Risk Management Report/Quarterly Risk Update

During the meeting the Committee considered an update report about corporate and departmental risks with the following key points discussed:

- A new, simplified risk report format was introduced.
- Members were encouraged to provide areas for improvement within the risk reporting. However, after consultation with the portfolio holder, corporate risks would include further narrative.
- 14 corporate risks were identified which included Planning decisions and potential special measures, Cybersecurity and Shared service delivery.

29th September 2025

Annual Review from the Local Government Ombudsman

During this meeting Members considered a report on the Local Government Ombudsman's Annual Review Letter, which set out the statistics for complaints made against the Council covering the year ending 31st March 2025.

Members were informed that the Local Government Ombudsman had changed its reporting approach. Annual letters would only be issued in cases of exceptional practice or concerns about complaint handling. Bromsgrove District Council (BDC) had not received such a letter for the period ending 31st March 2025.

During that period, 3 new complaints were received and 6 were decided. Of the 6 decided cases, only 1 complaint was upheld, relating to housing and home adaptations under a Disabled Facilities Grant. Both BDC and Worcestershire County Council (WCC) were found to be at fault, resulting in a service failure. The Ombudsman's recommendations were detailed in the report and had been considered by Cabinet on 22nd January 2025. All recommendations had been complied with. Of the remaining decided complaints, 3 were referred back to the Council as premature and 2 were closed after initial enquiries due to insufficient evidence of fault or injustice. A link to the Ombudsman's website was provided for Members to view statistics for other local authorities.

Audit Update Report 2023/24

This report provided a background and status update on the 2023/24 audit for the Council and context regarding the Government's legislation aimed at clearing the backlog of local audits and establishing a sustainable audit system.

It was noted that the Council had missed Phase One of the recovery deadline, as the 2021/22 and 2022/23 accounts were signed in January 2025, beyond the 13th December 2024 backstop date. This delay impacted the 2023/24 accounts, which were not published until mid-

January 2025, with the inspection period ending on 27th February 2025. Consequently, Phase Two of the recovery had not been met.

The audit commenced in June 2025, following onboarding delays. Challenges were encountered which included management resources being prioritised toward meeting the 30th June 2025 deadline for publishing 2024/25 draft statements, conflicting annual leave schedules and delays in the provision of requested information.

It was acknowledged that the Council had not been subject to audit for several years, which had impacted capacity and created challenges for the management team, however, efforts to address the issues was ongoing.

Despite the disclaimer of opinion on the 2023/24 financial statements, EY confirmed that auditing standards required certain procedures to be performed, which were underway. The local regulations also required Value For Money (VFM) work to be completed, which was also in progress.

Internal Audit Progress Report

The Committee received the routine internal audit progress report. It was noted that good progress had been made since the audit plan was approved in July 2025. The service was fully staffed and 82 audit days had been delivered against a full year plan of 250. Although this was below the pro-rata target, it had been planned to load more work into the second half of the year.

It was further reported that 2 audits were at draft report stage and 7 were in progress. Members' attention was drawn to the report provided which detailed 22 outstanding recommendations, including 1 high and 3 medium priority actions overdue as of June 2025. It was confirmed that actions related to aged debt reporting had since been implemented, reducing the total to 20 outstanding. The remaining overdue actions related to member training on cybersecurity and confirmation that third-party contracts included robust data security provisions. It was noted that the Council's new procurement regulations were expected to address the latter, pending confirmation.

Members also noted that no significant changes to the internal audit plan were proposed. Members were informed of upcoming team training events which included assignment management training and integrity and objectivity training.

Financial Compliance Report

This reporting provided an update on progress made in response to the Section 24 Statement and the Council's financial recovery and stabilisation efforts. It was reported that the Council had made good progress overall, with key deliverables such as the Quarter 1 Finance Performance and Treasury Management reports completed. However, 2 national returns remained outstanding which included VAT returns and Whole of Government Accounts (WGA).

Significant work had been undertaken with HMRC and tax advisors (PS Tax) with monthly VAT returns being submitted. An internal VAT team has been resourced complimented by an external specialist advisor, PS Tax to support the preparation and submission of error

correction notices as agreed with HMRC. Mandatory VAT training was being rolled out across the finance team, with introductory training planned for the wider organisation.

The WGA had not been produced for several years, in line with many other authorities. A substantial mapping exercise was planned to bring the Council back on track.

The 2023/24 and 2024/25 accounts were expected to be disclaimed due to audit timelines. Public consultation on the 2024/25 accounts had closed on 11th August 2025 and discussions with EY were ongoing. The Council had transitioned to clearing routine accounts on a monthly basis, marking a significant step forward from previous backlog clearance efforts.

A financial stabilisation plan update was also provided. The recovery phase had placed significant strain on the finance team and stabilisation was the priority. Several interim appointments had been made to strengthen the team including Chief Accountant (interim), Finance Services Manager (interim), 2 Senior Finance Business Partners (permanent), 2 Finance Business Partners (interim), VAT Specialist (interim), Tech One Systems Manager (interim) and Tech One Technical Support Officer (interim).

A Project Manager was still to be recruited who would oversee major workstreams and it was noted that the Council would utilise its finance stabilisation reserve to fund these temporary arrangements. A report outlining the structure and associated budget pressures was being prepared also for Member's consideration.

Annual Governance Statement

The Committee received the Annual Governance Statement (AGS) for the financial year ending 31st March 2025. It was explained that the AGS was a statutory requirement under the Accounts and Audit Regulations 2015 and provided a corporate overview of governance arrangements. Although it formed part of the Statement of Accounts, it was not a financial report.

The AGS was based on principles of good governance set out by The Chartered Institute of Public Finance and Accountancy (CIPFA) and The Society of Local Authority Chief Executives and Senior Managers (SOLACE) and covered systems, processes, culture, values, strategic objectives, stewardship of public funds and VFM. It also included internal controls, risk management, performance monitoring, compliance with the constitution, decision-making processes, scrutiny functions and contributions from internal and external audit.

It was noted that the AGS identified significant governance issues, including delayed accounts and the Section 24 statements. The delay in signing off the 2023/24 accounts was attributed to the withdrawal of the Council's previous external auditors Grant Thornton and the onboarding of EY. The Council had made representations to Central Government explaining the delay, which were accepted.

The Committee was informed that although disclaimer opinions were expected for 2023/24 and 2024/25, each audit cycle was providing increasing levels of assurance. The Council was working towards achieving a full audit opinion in future years.

24th November 2025

Standards Regime – Monitoring Officers’ Report

During this meeting the committee considered the Monitoring Officer’s reformatted report which provided updates on Member Complaints, Constitution Review and Member training as follows:

- Three public complaints against Members were received and resolved and were all assessed as not conduct matters.
- Five Member to Member complaints were received and resolved informally.
- The meeting of the Constitution Review Working Group (CRWG) which took place on 16th September 2025 discussed matters such as the retention schedule rules in respect of the live streaming of meetings.
- The Member Development Steering Group (MDSG) held a meeting on 27th October 2025. During this meeting the group received an ICT update and feedback from Members for the planning refresher training which took place on 2nd June 2025.

External Audit Update

The External Auditors Ernst and Young provided an update of the 2023/24 and 2024/25 accounts for Member’s consideration.

The following key points were discussed as follows:

- 2023/24 audits restarted in November 2025 and an audit opinion was expected in the new year.
- The draft auditor’s report for 2024/25 had been shared with the Interim Section 151 Officer and would also be provided to the Chairman of Audit, Standards and Governance Committee.
- The 2024/25 audit backstop date of 27th February 2025 would be achieved but due to time constraints, would have a disclaimer opinion.
- The Value for Money (VFM) 2023/24 accounts were nearing completion and once completed EY would then begin to review the 2024/25 accounts.

Risk Management Report/Quarterly Risk Update

This reporting provided The Corporate Risk Update Quarter 2 2025/26 set out activities the Council undertook to monitor and mitigate risk at a corporate level. The Council held a risk register of the most significant risks in relation to the achievement of corporate priorities. This risk register was reviewed quarterly in accordance with the Risk Management Strategy.

As part of the audit reports in 2021 and 2023 the Council introduced processes to actively embed risk mitigation into normal business and introduced departmental ownership of service risks. The latest audit of the Risk Management Embedding 2024/25 dated 1st June 2025 produced an audit opinion of ‘Reasonable Assurance’.

Corporate Risks were identified in the table set out in the report. There had been two movements since the Q1 report as follows:

- Delivery of the Levelling Up Board (COR0010) which moved from an inherent risk of 12 to 9 and residual risk of 12 to 6. Levelling Up Fund (LUF) projects would be completed in May 2026 ahead of the funding deadline.

- Bromsgrove DC Being placed into special measures due to quality of planning application decisions COR0009 had moved from an inherent risk of 9 to 6. Managers supported maintaining a good turnover of major applications, to provide a stable numerical base and also continued to closely monitor appeal decisions. Planning committee members were provided with performance information via a report at Committee which would be completed on a quarterly basis.

Service Risks were set out in the report with no movements since Q1.

Training on how to use the 4Risk system was being arranged for all Members early the following year which would enable Members to review the system.

The Chief Executive also agreed with the Committee and suggested incorporating an additional corporate risk in relation to the arrangements for the Interim Section 151 Officer. It was also suggested that there should be an internal audit review of the actions to mitigate the risks associated with the interim role to provide additional assurance regarding looking forward in respect of financial governance and reporting matters.

Cyber Security Update (Including Whatsapp and AI Policy)

This report introduced two policies for recommendation to Cabinet as follows:

- The Artificial Intelligence (AI) Acceptable Use Policy set principles for ethical, transparent AI use, GDPR compliance and training requirements.
- The WhatsApp Policy restricted use to non-sensitive information. It also set out risk mitigation and compliance steps.

Internal Audit – Progress Report

During this item the Committee received the routine internal audit progress report with the following key points raised:

- 119 productive days had been delivered against a 250-day plan.
- 1 audit had been completed, 3 were in draft stage and 10 were in progress.
- No emerging issues impacted the overall assurance.
- There were 18 outstanding recommendations and 1 high priority overdue which related to cybersecurity training for Members.

Financial Compliance Report including update on Statement of Accounts

During this reporting, Members were advised that it was important that the processes put in place following the issuing of the Section 24 Statement continued via this quarterly Financial Compliance Report.

The report detailed that the Council were complying with national requirements. Local requirements had been delivered when the budget was approved on the 19th February 2025, particularly in relation to the Treasury Indicators which had continued with the delivery of the Quarter 2 Finance and Performance Report and the Treasury Report.

The key returns for Value Added Tax (VAT) and the Whole of Government Accounts (WOGA) had not been delivered to date. Significant work had been undertaken by the Council's Tax advisors Public Sector Tax, in liaison with His Majesty's Revenue and Customs, in order for the Council to return to normal VAT reporting, with final version working papers provided to

HMRC on the 19th December 2024. Monthly returns were being made from December 2024 onwards. Additional resources had been established to strengthen the finance team in relation to VAT, including a VAT accountant. Mandatory VAT training had taken place for all finance staff and would be rolled out across non finance staff within the organisation.

The WOGA had not been produced for several years and therefore required a substantial mapping exercise. It was unlikely that the Council would be able to achieve this before the Cycle 2 deadline of 3rd October 2026, however, the Council had begun work to achieve a submission over the next three months. The Tech One financial system was also being upgraded to version 25B.

The Council's position on the key closure deliverables was also presented to Members for years 2020/21, 2021/22, 2022/23 and 2024/25.

A Finance Stability Plan had been developed which covered several areas including the Tech One finance system, financial regulations and structure of the finance team:

- A review of the Tech One system had taken place which included a health check with results nearing completion and was expected to include reinstallation of certain elements of the system with suggested fixes to other areas. Any revised implementation would be completed in conjunction with Tech One and would be supported by a full in-house project team to lead on this.
- The Council was stabilising its finance team through the immediate recruitment of several interim staff which were in place to support the finance team. It was noted that a Chief Accountant had been recruited, there was now an additional Senior Finance Business Partner, and two new business partners with a third being recruited.

Key deliverables since the last meeting included:

- A Finance Stability Plan which had been developed to cover a number of areas including the Tech One system, financial regulations and structure of the finance team.
- The Quarter 2 Finance and Performance Report had been produced along with the Quarter 2 Treasury Management Report.

17th February 2026

Standards Regime – Monitoring Officers' Report

The main points highlighted in this report were as follows:

- The report included an updated list of member complaints, including historic complaints as requested by Members.
- All complaints reported at the previous meeting had been resolved.
- Two new public complaints and one new member complaint had been received; the latter remained at initial assessment stage.
- Updates were considered from the Constitution Review Working Group held on 16th September 2025 and Member Development Steering Group held on 27th January 2026.
- It was advised that the Steering Group discussed Potential WhatsApp Policy training for Members; Agreement that most 2026–27 training would be delivered remotely; and Safeguarding training was requested and dates were being arranged.

Risk Management Report/Quarterly Risk Update

The corporate risk register and key developments were as follows:

- All risks had been freshly reviewed and that more changes than usual were expected.
- Proposals for an independent audit of risk management governance would be included for the next audit year.
- LGR risks were being integrated through County level workstreams and tagged within the risk register.
- A new Power BI dashboard had been developed to give real time access to the Chair, Vice Chair, Risk Champion and Portfolio Holder.
- Staff and Member training on risk management would be arranged in the new municipal year.

The key risk changes highlighted were as follows:

- Contract management risk closed and moved to operational level.
- Cyber Security risk increased to 16, reflecting national guidance.
- Planning placed in special measures due to the quality of applications, moved to amber due to increased overturned decisions with risk score of 8.
- Customer Interface Project closed due to LGR context.
- Food waste implementation risk increased following Wyre Forest's withdrawal from joint procurement.
- LGR risk updated with strengthened mitigations and residual risk remained at 12.
- The Section 151 Officer risk retained until permanent recruitment had been completed.

Internal Audit – Progress Report

The main points were considered below:

- There was strong progress in delivering the audit plan, with 188 of 250 days completed by 23rd January 2026.
- Five audits were completed with four since the last meeting.
- Payroll received Substantial Assurance.
- General Ledger received Limited Assurance due to delays in reconciliations relating to historic system implementation issues.
- Health and Safety received Limited Assurance with significant issues in induction training and risk assessment completion.
- Transparency Code Audit gave Reasonable Assurance.
- There was an outstanding High-Risk recommendation for Member Cyber Security Training. It was noted that only one Member remained outstanding.
- Audit Planning for 2026/27 was underway.

Financial Compliance Reporting including Update on Statement of Accounts

The key points are summarised below:

- Value Added Tax (VAT) returns were being restored following extensive work with tax advisors.
- Whole of Government Accounts (WOGA) required remapping, with work scheduled for 2026–27.
- A cash receipting reinstatement project was underway.
- Significant progress was achieved since the Section 24 Notice.

Also during discussions, the Section 151 Officer suggested that a recommendation should be reviewed by the Committee given the external auditors views and opinion remained outstanding therefore the committee could not be fully assured for the auditing of the 2023/24 and 2024/25 accounts. Following discussions the Chairman suggested, and the Board agreed that the recommendation should be deferred until an in-camera session with EY and the Internal Auditor could be arranged. In conclusion the Committee did confirm assurance on progress made against the Section 24 Notice as a suggested alternative recommendation.

Capital Strategy 2026/27 including Treasury Management Strategy

A high-level overview of capital expenditure, borrowing levels, prudential indicators and treasury risk management was provided by the Finance Manager.

Review of Accounting Policies

During this meeting Members were updated on the accounting policies and advised that no changes were required by the accounting policies for 2025/26. The Section 151 Officer assured Members that the policies continued to comply with the Chartered Institute of Public Finance and Accountancy (CIPFA) code and International Financial Reporting Standards (IFRS).

16th April 2026

The last meeting of Audit, Standards and Governance Committee in the 2025-26 municipal year at which this Annual Report will be presented. Items considered at this meeting included:

- Standards Regime – Monitoring Officer's Report
- Update on progress made to resolve outstanding VAT position
- External Audit Backstop Report
- Internal Audit Progress Report
- Risk Management Report/Corporate Risk Register
- Risk Champion Update
- Financial Compliance Report including update on Statements of Accounts
- Whistleblowing Policy Update
- Annual Audit, Standards and Governance Committee Report 2025/26

Legal, Democratic and Procurement Services

Bromsgrove District Council

Parkside

Bromsgrove

Worcestershire B61 8DA

Telephone: 01527 64252 Ext 1605

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BROMSGROVE DISTRICT COUNCIL

LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES



Overview and Scrutiny **ANNUAL REPORT**

2025 - 2026



Bromsgrove
District Council

www.bromsgrove.gov.uk

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FOREWORD FROM THE CHAIRMAN

This year has been as challenging as the previous year, including the number of task groups and workload in general. Once again, additional meetings were held to cope with the increase in work and of course calling upon Members to give up more of their free time. Ensuring scrutiny is carried out in an efficient and robust manner has led to the overwhelming recommendations from meetings and task groups being accepted by the Cabinet, which made it all worthwhile.

There is no doubt the following year will be just as challenging with Local Government Re-organisation (LGR) on the horizon, requiring the number of meetings to increase.

I would like to thank all Members of the Board who have committed their time and energy to the tasks we were confronted with and of course to all those who took part in task groups. I also realise the amount of work this has been placed on our Officers and I am thankful for their help and support.

Councillor Peter McDonald
Chairman of the Overview and Scrutiny Board

INTRODUCTION

We are pleased to present the Overview and Scrutiny Annual Report which outlines our work during 2025-2026 (this covers the municipal year from May 2025 to April 2026) and provides general information on the overview and scrutiny processes at Bromsgrove District Council (BDC).

Overview and Scrutiny is a key part of the democratic decision-making process in local Councils, where elected Councillors outside of the Cabinet can contribute to shaping Council policy, community well-being and accountability. This is done by reviewing Council services and policies, community issues and key decisions and making recommendations for improvement.

The four key principles of Overview and Scrutiny, as defined by the Centre for Governance and Scrutiny (CfGS) the lead organisation supporting Overview and Scrutiny in the country, are:

- provide constructive “critical friend” challenge
- amplify the voice and concerns of the public
- be led by independent people who take responsibility for their role
- drive improvement in public services

The Members of the Board consider these principles when selecting topics to investigate whether it is holding the Cabinet to account, reviewing policies, policy development or scrutiny of external bodies.

MEMBERSHIP

(The Board is made up of 11 Members)



**Councillor P. M. McDonald
(Chairman)**



**Councillor A.M. Dale
(Vice-Chairman)**



Councillor S. Ammar



Councillor A. Bailes



Councillor R.A. Bailes



Councillor J. Clarke



Councillor B. Kumar



Councillor R.E. Lambert



Councillor S. A. Robinson



Councillor J. D. Stanley



Councillor H.D.N. Warren-Clarke

THE ROLE OF THE OVERVIEW AND SCRUTINY BOARD

Overview and Scrutiny is a key part of the Council's political structure and it plays a vital role in improving the services that people of the District use. It does not just look at the way the Council carries out its services, it can look at anything which affects the lives of people within the District and it allows citizens to have a greater say in Council matters.

Overview and Scrutiny allows Councillors to review and scrutinise decisions, look at existing practices and make recommendations to help ensure the residents of Bromsgrove District receive excellent services. The aim is to ensure overview and scrutiny adds value to the Council's decision-making process and makes a positive contribution towards policy development.

The detailed terms of reference and procedure rules for the Overview and Scrutiny Board can be found at Part 5 and Part 12 of the Council's Constitution. The Council's Constitution can be accessed by using the following link.

[Link to the Constitution of Bromsgrove District Council](#)

(Please click on the latest date to access the most recent version of the Council's constitution).

Meetings

Throughout 2025-26, Overview and Scrutiny Board meetings have been taking place in person and were open to the public to attend at Parkside Hall in Bromsgrove. Meetings are live streamed if there is significant local interest in the items being considered at Overview and Scrutiny Board meetings. Meetings of Scrutiny Task Groups and Working Groups continue to be held remotely, since these meetings are private.

REPORTS CONSIDERED BY THE BOARD

The Board continued to receive updates to monitor the progress of recommendations it had made, with the recommendations made throughout the year outlined in this report. This contains both recommendations put forward by Task Groups and accepted by the Cabinet, together with recommendations put forward by the Board itself. In respect of Task Groups, the Board does, where necessary, receive an update report 12 months following acceptance of its recommendations.

During the year the Board had made several recommendations. There has been continued support from the relevant Cabinet Members this year, with regular attendance at Overview and Scrutiny meetings in relation to reports concerning Cabinet Members' areas of responsibility. This has given the Cabinet an opportunity to hear first-hand the debate and any recommendations made by the Board. The Chairman of the Board attends Cabinet meetings to present any recommendations made. On several occasions, whilst the Board had not made any recommendations in respect of an item, it had endorsed and/or supported recommendations which were then considered by Cabinet at its meetings.

The Board is due to consider the Overview and Scrutiny Annual Report 2025-26 at the meeting due to be held on 14th April 2026.

SUMMARY OF RECOMMENDATIONS

During the course of the 2025/26 municipal year the following recommendations were suggested to Cabinet:

Bromsgrove Town Centre Recycling Bins

RECOMMENDED that the Officers proceed with preparing a budget bid to Cabinet to invest in new (recycling) bins for installation in Bromsgrove Town Centre.

Planning Enforcement

RECOMMENDED that Key Performance Indicators (KPIs) be introduced to measure Worcestershire Regulatory Services' (WRS) Planning Enforcement performance in Bromsgrove and that the KPIs be incorporated into monthly reporting to Members together with enhanced information on live enforcement cases data.

Overview and Scrutiny Board Work Programme

RECOMMENDED that the Chairman of the Overview and Scrutiny Board submit a request on behalf of the Board that Cabinet consider, as an item of urgent business, whether to extend the current public consultation period for the Local Plan.

Housing Task Group

Recommendation 1 – Housing Allocations

Officers approach Bromsgrove District Housing Trust (BDHT) and jointly explore a startup crisis package for residents living in social housing including the potential of an increase in housing benefit payment to cover the costs of the crisis package. The findings to be completed in three months and reported back to the Overview and Scrutiny Board.

Recommendation 2 – Housing Allocations

Bromsgrove District Council's preference is for the mix of affordable housing contained within a new development be made up of social rent and shared ownership properties only and exclude outright sales of affordable homes.

Recommendation 3 – Asset Rich and Potentially Revenue Poor

Officers provide Members with costings of bad debt owed to the Council as a result of non – payment of Council tax by residents.

Recommendation 4 – Asset Rich and Potentially Revenue Poor

Officers monitor the number of residents claiming Council Tax Support in housing Bands F, G and H (with metrics built into the performance reporting framework).

Recommendation 5 – Section (S) 106 Contributions

Where a planning application has a material impact on the local community and there is a consideration for S106 contribution allocation, the Ward Member (and neighbouring Ward Member(s)) should be informed and consulted with prior to consideration of the application. A follow up consultation with the Ward Member (and neighbouring Ward Member(s)) should also take place.

Recommendation 6 - Fleeceholding

As part of the Local Government Reorganisation process, the Council:

- a) Notes that the Government is currently analysing the feedback from the consultation which sought views on proposals to implement aspects of the Leasehold and Freehold Reform Act 2024 and further reform related to the charges leaseholders and homeowners on freehold estates, pay and services they receive, which closed on 26th September 2025.
- b) Suggests that a new unitary authority continues to lobby Government on the matter of fleeceholding within Bromsgrove District.

Finance & Budget Working Group

RECOMMENDED that future Quarterly Financial Outturn and Performance reports provide:

- i a detailed narrative in terms of variance for each specific service area
- ii for each area of high variance provide detail on the action(s) being taken to address the issue and the officer(s) responsible
- iii information on recharge amounts

THE OVERVIEW AND SCRUTINY BOARD'S WORK PROGRAMME

The following items were considered by the Board during the 2025/26 municipal year:

Overviews

- Local Government Re-Organisation All Member Engagement Session
- Installation of EV Chargers
- Local Plan Consultation Methods
- Bromsgrove Town Centre Re-cycling Bins
- Council Tax Recovery
- Planning Enforcement
- Windsor Street (Options Paper)
- Citizens Advice (Uses of Grant Funding)
- Strategic Overview of Bromsgrove District Housing Trust (BDHT) Services
- Police and Crime Commissioner update
- Planning Advisory Service (PAS)
- Town Centre Parking and ANPR update
- EV Charger Profit Sharing Arrangements update

Pre-Scrutiny

- Contaminated Land Strategy
- Bromsgrove District Plan Consultation
- Bromsgrove Town Centre Strategic Framework
- Expansion of Commercial Waste Collection Services
- Homelessness Prevention Grant and Domestic Abuse Grant
- Windsor Street Site
- Biodiversity Duty Report
- Homelessness Prevention, Rough Sleeper and Domestic Abuse Grants Funding 2027/28 and 2028/29
- Particulate Monitoring

Standard Updates

- Local Government Re-Organisation (LGR) (Regular)
- Local Heritage Action List (Quarterly)
- Levelling-Up Fund Programme (Quarterly)
- Crime and Disorder Scrutiny (Annually)
- Heatwaves Preparedness (Annually)
- Overview and Scrutiny Annual Report 2025/26

All Member Briefings

- Anti-Social Behaviour (Tools and Powers)

Task Group

In addition to the above, updates were provided throughout the year for the Housing Task Group. The final report which included recommendations was considered by the Board on 18th November 2025.

OVERVIEWS

Local Government Reorganisation All Member Engagement Session Supported by Mutual Ventures

A stakeholder engagement process was being carried out to inform the appraisal process which included a public and local stakeholder engagement session. This stakeholder engagement session sought that all Members of BDC be invited to ensure that Members had an opportunity to provide their views to Mutual Ventures, who were supporting an appraisal of the options under consideration in Worcestershire for LGR.

The options appraisal process was to assess the performance of two options for a unitary structure in Worcestershire which consisted of a unitary council for the whole county of Worcestershire or two unitary councils in Worcestershire which would consist of a north and south divide.

Key lines of enquiry were discussed as part of the stakeholder engagement process to establish the performance of these options in comparison to the Ministry of Housing, Communities and Local Government's (MHCLG) criteria for LGR.

Installation of EV Chargers

The purpose of this report was to outline the Implementation of Electric Vehicle (EV) charging infrastructure across BDC's owned car parks and land. Key objectives of the project were to increase the availability of EV charging points in public spaces, whilst supporting the Council's Carbon Reduction Strategy.

Bromsgrove Town Centre Recycling Bins

This item reported on recycling and waste collection arrangements in the Bromsgrove Town Centre. The report had been drafted to address a request from the Board raised in February 2025 for a review of the implications of no longer recycling waste on Bromsgrove High Street.

The Place Teams audit of the town centre recycling bins had shown poor levels of adherence to the use of each bin, with the contents of recycling bins showing that only one fifth of the entire waste collected was recyclable when sorting by hand was undertaken. The Council was not recycling any waste from Bromsgrove High Street bins because of the cross-contamination of waste.

It was agreed by the Board that a recommendation be put forward to Cabinet asking that Officers proceed with preparing a budget bid, with the view of investing in new (recycling) bins for installation in Bromsgrove Town Centre. The Board proposed the following recommendation:

RECOMMENDED that the Officers proceed with preparing a budget bid to Cabinet to invest in new (recycling) bins for installation in Bromsgrove Town Centre.

Council Tax Recovery

During consideration of this report, Council Tax debt recovery procedures was provided. This followed a request by the Board for a report to explain the legislative framework governing council tax recovery, outline the procedures applied by the Council for council tax recovery and the use of enforcement agents and which identified the actions the Council could take to improve the recovery process and the barriers to improvement.

It was noted that the Money and Mental Health Policy Institute (MMHPI) report entitled "In the Public Interest?" argued that legislation governing council tax collection required reform and identified four areas of improvement. The areas included communication with individuals in

debt, speed at which council debt escalated the over-reliance on automated procedures, lack of flexibility in dealing with debt cases and the enforcement action used. The report clarified and responded to these areas of concern, detailing how the Council managed its debt recovery process.

Planning Enforcement

For this reporting Members were reminded that the delivery of the planning enforcement was largely transferred to Worcestershire Regulatory Services (WRS) on 1st June 2024, with investigation of cases the responsibility of WRS and input provided from planning officers where their professional expertise was required. It was highlighted that prior to the formal takeover of the planning enforcement function by WRS, there had been assistance provided to the Council's planning officers with the investigation officer role since the beginning of the coronavirus pandemic.

There were 302 cases of alleged planning breaches in 2024/25 which required WRS to undertake investigations. Of these, 5 cases were assigned as priority 1 cases as they satisfied the criteria for this set out in the Enforcement Policy. Of the valid cases, 173 out of 175 were closed and resolved by informal compliance or no issue in 2024/25. There were 304 open planning enforcement cases as of September 2025.

It was stated that the backlog in open cases had fallen slightly from 320 to 304 over the most recent period. Progress in clearing the backlog was slowed by the need to establish and embed the team within Bromsgrove since 1st June 2024 and the complexity of some cases where evidence of harm (in planning terms) had been identified. The short-term additional resource available to WRS to work on clearing the backlog would end in June 2026.

In relation to the number of valid cases with Community Protection Warnings (CPWs) or Community Protection Notices (CPNs) served, it was stated that since April 2025, four additional CPWs and two additional CPNs were served.

Officers highlighted that planning policy allowed retrospective applications to be considered (i.e. applications after an action had been taken) which necessitated the maintenance of an informal approach to negotiate compliance with planning rules.

The benefits of the current approach to Planning Enforcement were set out including that this allowed Planning Officers to focus on planning matters whilst the investigation and enforcement cases were dealt with by WRS.

Following consideration of this item, Members agreed that it should be recommended that there be more information regarding Planning Enforcement cases including monitoring of the WRS performance through Key Performance Indicators (KPIs). After consideration the following recommendation was agreed:

RECOMMENDED that Key Performance Indicators (KPIs) be introduced to measure Worcestershire Regulatory Services' (WRS) Planning Enforcement performance in Bromsgrove and that the KPIs be incorporated into monthly reporting to Members together with enhanced information on live enforcement cases data.

Windsor Street (Options Paper)

The purpose of this report was to inform the Board on the options for the delivery of housing on the Windsor Street site in Bromsgrove. It was noted that the Windsor Street site had stood derelict since 2014 and that the Council had been successful in obtaining £3,490,000 for the redevelopment of the site from various sources. No BDC funding had been used in the project to date.

It was noted that residential use was considered as most appropriate for the site and only development opportunities for housing had been considered in the report. The three potential delivery options were:

- Option A: Obtain outline planning permission and dispose of the site on the open market.
- Option B: Develop through Spadesbourne Homes Limited and retain market value properties (dispose of affordable units).
- Option C: Enter into partnership with a private developer or a registered social landlord (RSL).

Citizens Advice (Uses of Grant Funding)

During the meeting Members were updated on the uses of grant funding for the Citizens Advice Bromsgrove and Redditch (CABR) charity within the Bromsgrove District.

The following key points were presented to the Board:

- The four key support areas provided by CABR were Core Services, Household Support Fund Distribution, Affordability Assessments and Outreach Development Projects.
- The Funding contribution from BDC was £123,400 with Worcestershire County Council (WCC) adding £23,606 per year.
- BDC was the highest funding contributor in Worcestershire.
- The national average for funding the CABR was £1.34 per head in 2023/2024.
- CABR provided advice which was regulated by the Advice Quality Standard (AQS), Financial Conduct Authority (FCA) and Money and Pensions Service (MaPS).
- The charity was supported by 50–60 volunteers. The call answer rate had improved from 24% in 2020 to 38% in 2025.
- In total, 4,710 households within the District received full advice and 773 households received light-touch advice.
- £388,601 income had been gained and £676,674 worth of debts had been managed for local residents.
- The Household Support Fund (HSF) costed £7,000 per annum to deliver with £50,000 of funds distributed.
- £2,745 had been provided a year to carry out affordability assessments for Bromsgrove District Housing Trust (BDHT) clients.
- £62,000 had been provided by the Council for an Outreach project over 18 month with regular sessions held in the areas of Charford, Catshill, Rubery, Wythall, Alvechurch, Sidemoor and Clent.
- There were future challenges to consider such as increased demands, funding sustainability and the LGR implications.
- There were potential outsourcing opportunities for the follow-on funding from the HSF Scheme, including discretionary housing payments and tenancy support.

Strategic Overview of Bromsgrove District Housing Trust (BDHT) Services

During this item Members were given a strategic overview of the BDHT Services within the Bromsgrove District which included the following key points:

- BDHT's objectives included being an excellent landlord, employer and a community-based Housing Association.
- Stock levels had grown to over four thousand homes, with a strong focus on the Bromsgrove District.
- Financial viability remained critical with all expenditure funded through rental income.
- Compliance and safety were highlighted as top priorities following national regulatory changes.
- Recruitment and retention of skilled staff were proving challenging.

- Complaints were increasing, partly due to external claim companies and rising customer expectations.

Police and Crime Commissioner (Update)

Following a request from a Board meeting held on 18th November 2026 the representative for the Police and Crime Commissioner (PCC), accompanied remotely by a local inspector provided a strategic update to the Board with the key points discussed as follows:

- Policing remained predominantly people based, however, pay pressures continued to exceed central grant increases.
- West Mercia Police had grown in officer numbers significantly but rising pay scales created budget strains.
- Civilian workforce reductions had been actioned but frontline focus was being protected.
- Overall crime continued to fall across the District but outcomes of successful investigations remained a key area for improvement.
- Focus centred on prompt investigations, file quality and improving justice outcomes for victims.
- The PCC emphasised the importance of cooperation with District Councils on community safety and early prevention.
- A renewed emphasis was placed on Councils to raise localised concerns directly.

Planning Advisory Service (PAS)

Following discussions at its Board meeting held on 6th January 2026, Members requested the Planning Advisory Service (PAS) findings report be provided. This session sought to include all Members of BDC to ensure they had an opportunity to hear the presentation and to provide their views and questions to the consultants in person.

An initial overview was provided and it was explained that the PAS review had been commissioned to assess governance, relationships, barriers to decision making and improvements required for Development Management, Local Plan preparation, Officer-Member working and Readiness for forthcoming planning reforms.

A presentation to discuss the Development Management Workstream was carried out with the key points highlighted as below:

- Procedures and protocols were generally sound.
- Key issues related to strained Officer–Member relationships.
- There was insufficient early engagement prior to Planning Committee.
- There was a need for a “reset” of working practices.

Recommendations included:

- Improved collaboration.
- Training on defensible decision making.
- Addressing relationships with WCC Highways.
- Review of enforcement processes.
- Improving Planning Committee focus.
- Reviewing livestream retention.
- Increasing Member involvement at pre application stage.
- Improving attendance at site visits.

A presentation was also provided to Members to discuss the Local Plan Workstream. The main points highlighted were:

- A significant divergence between Members on the draft development strategy.
- Lack of political buy in and sense of “ownership” of the plan.
- Insufficient shared vision for the District’s future.
- Evidence base gaps (e.g. Green Belt assessment, infrastructure planning).
- Poor relationships with WCC on transport and education.
- Requirement for clearer governance of the Strategic Planning Steering Group (SPSG).
- Importance of a 30-month statutory timetable under the new system.
- Emphasis on risk management, programme management and Member training.
- Need to develop a spatial vision and place making objectives.

Town Centre Parking and ANPR (Update)

During a Board meeting held on 18th November 2026, it was requested and agreed that a Town Centre Parking and Automatic Number Plate Recognition (ANPR) update be provided.

During the Board’s meeting held on 10th February 2026 it was reported that Town Centre parking capacity remained sufficient, with peak demand significantly below the 1,013 available spaces. St John Street and Windsor Street car parks continued to experience the highest utilisation, while School Drive, North Bromsgrove and Stourbridge Road remained underused.

The Board noted the following redevelopment considerations:

- Churchfields remained closed due to Anti-Social Behaviour (ASB) risks, with high costs required for reopening and ongoing maintenance.
- Stourbridge Road was subject to an existing development agreement and observed usage indicated high weekday occupancy by season ticket holders.
- School Drive was identified as suitable for redevelopment due to consistently low usage and a potentially higher capital receipt.

Even with redevelopment of one or more sites, overall parking demand was predicted to remain comfortably met.

Sanders Park Car Park was being used by Town Centre workers for all day free parking, however, options were presented to introduce time limit charges or MiPermit only operation.

Season ticket usage at Parkside had raised concerns from local businesses. Survey findings indicated most users were season ticket holders rather than Council Staff. Options included amending which car parks accepted season tickets.

ANPR implementation was reported as not viable due to legal constraints, operational requirements for barriers, cost implications and no reduction in enforcement workload.

Out of town enforcement had met the agreed minimum requirement, with between 26% to 29% of patrol time spent outside the Town Centre. Increasing enforcement would require additional staffing at significant cost.

Financial implications were highlighted, including income levels, resurfacing costs and the financial impact of potential car park redevelopments.

The report concluded that a strategic, place-based approach was required to support Town Centre accessibility and economic activity, with further on-site counts recommended.

EV Charger Profit Sharing Arrangements (Update)

During a Board meeting held on 6th January 2026 Members raised frustrations regarding delays in progression for the update on Electric Vehicle (EV) Charger profit sharing arrangement negotiations which had been requested during previous Board meetings. Members noted that a meeting had been held with the Leader and relevant Officers to discuss progression and that a briefing paper would be provided to Members of the Board at the next meeting to be held in February 2026.

During the Board meeting held on 10th February 2026 an update was provided with the main points considered by the Board:

- The Council had sought to utilise its own land to provide Electric Vehicle Charging Infrastructure (EVCI) for financial viability.
- Zest Eco Limited procured the contract to undertake a further exploration to expand EVCI across land that were not covered by the taxi scheme.
- Three sites were identified as being viable; two sites had completed installation and one site was in progress.
- Following queries from the Board, a review had been carried out to explore the income terms and conditions of the contract.
- Barnt Green Parish Council advised that they had used the same Council supplier Equans as used for the Plug-in Taxi Programme.
- There were legal implications and both parties would need to agree to vary the agreement if seeking early payment. Alternatively, a break notice/termination clause within the contract was suggested as another option, however, compensation costs may be payable, given the expenditure incurred to date for installations.

Other Overview items due to be scrutinised at its April meeting are as follows:

- Envirocrime (to include Environment Crime update, Environmental Crime Enforcement Policy and Littering from Vehicles).
- Permission to Revoke the First Homes Policy
- Renters Rights Act 2025

PRE-SCRUTINY

Contaminated Land Strategy

During this meeting the Contaminated Land Strategy was presented with the key points discussed:

- The new inspection strategy aimed to replace the previous version and meet the requirements of the statutory guidance which was issued in 2012.
- The strategy outlined the process for the review of potential contaminated land sites within the District and the prioritisation methodology used.
- The report aimed to provide an overview of the framework that existed in respect of contaminated land.
- Part 2A of the Environmental Protection Act 1990 placed a duty on Local Authorities to review and assess the significant possibility of harm to human health arising from contaminated land.
- Contaminated land legislation should only be used when there were no other alternative mechanisms available. However, the framework was predominately reviewed through the Planning and Development Control process.
- The revised report reflected the gradual reduction and withdrawal of funding from Central Government.
- To date no sites had been declared as “Contaminated Land” by BDC, however, several sites of concern had been subject to detailed inspection.
- Planning policies encouraged the reuse of Brownfield land.

Bromsgrove Town Centre Strategic Framework

A strategic framework for Bromsgrove Town Centre was presented to Members which had been developed in collaboration with the Portfolio Holder and shaped through two stakeholder workshops. The framework aimed to consolidate various existing policies and plans into a unified vision for the town centre’s future. It was designed to be inclusive and community owned, rather than solely a Council initiative, to ensure resilience and relevance post LGR.

The framework was grounded in placemaking principles and intended to guide regeneration activity, partnership engagement and investment priorities. It incorporated elements from the Bromsgrove Town 2040 Vision, Local Plan and regeneration projects funded through the Levelling-Up project.

Key strategic aims included:

- Transforming public spaces and connectivity
- Celebrating Bromsgrove’s unique identity
- Enhancing town centre links and visitor access
- Building a safe and inclusive community
- Cultivating a thriving local business ecosystem
- Creating vibrancy to attract more visitors

The vision had been previously considered by Stakeholders and Members during various group activities to ensure all the aims and objectives were included. An action plan encompassing the key strategic aims was to be developed under the oversight of a newly formed Town Centre Steering Group, comprising various stakeholders. This group would define Key Performance Indicators (KPIs), milestones, resource implications and explore the feasibility of establishing a Business Improvement District (BID). Progress would be monitored through an annual “State of the Town” health check which would link in with planning policies and quarterly reports would also be provided as and where necessary.

Expansion of Commercial Waste Collection Service

This report set out proposals for the expansion of the Council's commercial waste collection service. It was stated that with the provisions of the Environment Act 2021, businesses were required to separate food waste (and microbusiness due to be required to do the same from April 2027), which afforded increased opportunities for service growth as there would be growth in demand for commercial food waste services.

It was highlighted that the Council's Commercial Waste Collection Service had expanded considerably since its inception in 2015, however, in excess of an £800k annual income would be placed at risk if the Council could not provide a compliant service.

The commercial waste service had been a profit-maker for the Council and only recently saw increased costs as a result of wider fleet and maintenance issues within the service. The recommendations in the report were to address this with the purchase of two Refuse Collection Vehicles (RCVs) designed to reduce reliance on hire vehicles in the long term.

Homelessness Prevention Grant and Domestic Abuse Grant

The purpose of this report was to approve how BDC would allocate government homelessness related grants for 2026/27 and to seek delegated authority to manage any unallocated funding during the year.

Key Points were highlighted as follows:

- From 2026/27 Government would merge several homelessness grants into a single Homelessness and Rough Sleeping Grant, expecting to be in a three-year settlement.
- Around 51% of the current Homelessness Prevention Grant would be moved into a Revenue Support Grant but the Council proposed ringfencing this money for homelessness prevention.
- Total expected funding for 2026/27 included:
 - o Homelessness Grant: £112k
 - o Homelessness Prevention Grant: £349,018k
 - o Rough Sleeping Prevention & Recovery: £34,899k
 - o Domestic Abuse New Burdens Funding: £35,744k
 - o Total: £531,661k

Funding was allocated to a mix of temporary accommodation provision, voluntary sector partners, youth homelessness services, tenancy sustainment and support, debt advice, rough sleeper outreach, mental health work and commissioning specific posts.

The Homelessness Grant Allocation of approximately £495,917k included:

- BDHT Housing Agency staffing
- Temporary accommodation units
- Severe Weather Emergency Provision
- St Basils Foyer and Crash Pad
- Support for young people, ex-offenders, rough sleepers and tenancy sustainment
- CAB debt advice & affordability assessments
- Housing First/Housing Led model
- Empty Homes Officer (part-time)

The Domestic Abuse Grant of £35,744k included:

- County domestic abuse co ordinator and research officer
- Housing Options top up
- Furniture project (NewStarts)
- Basement Project support

Without this funding many voluntary sector services would cease, increasing homelessness and pressures on council services. Funding helped to maintain existing accommodation, reduce rough sleeping, mitigate financial hardship and enable victims of domestic abuse to access safe accommodation. The funding was provided as a recognition of affordability challenges, reducing housing turnover and limited social housing availability.

Windsor Street Site

The purpose of this report was to recommend that the Windsor Street brownfield site in Bromsgrove Town Centre be redeveloped for residential use and to identify the preferred delivery model. The site had been vacant since 2014, posing issues with vandalism and anti-social behaviour. Redevelopment had previously failed due to abnormal contamination costs and planning concerns.

The Council had successfully secured £14.5m of Levelling Up Funding with £3.49m allocated to Windsor Street, plus extra funding from UKSPF of £84k, One Public Estate (OPE) of £100k and Brownfield Land Release Fund (BLRF) of £722k.

Phase One remediation was completed, however were awaiting an Environment Agency review. Phase Two remediation works were expected to be completed in approximately 6 months' time. Housing delivery would not be delayed due to planning works which were still required to be completed.

The Board considered the various options, however, Option D - Partner with a Registered Social Landlord was considered the preferred option for the following reasons:

- Allowed 50% affordable housing, modern low carbon homes and better alignment with local housing need.
- Funding opportunity through Homes England.
- Construction was expected to begin early 2027.
- Regenerated a key town centre site.
- Met the housing need while protecting the Green Belt areas.
- Increased footfall and supported local businesses.
- Delivered environmental improvements through brownfield remediation.

Biodiversity Duty Report

This report outlined the statutory requirements under the Environment Act 2021 for all public authorities to conserve and enhance biodiversity. Members noted that the Council was legally required to publish a Biodiversity Duty Report by March 2026.

The following key actions which had been completed included:

- Green Flag Awards for Sanders Park and Lickey End Recreation Ground.
- Grass verge biodiversity initiative.
- Tree planting programme with a target of 100,000 trees over 15 years.
- Pesticide reduction and alternative weed control.

- Integration of biodiversity monitoring into the Climate Change Strategy.
- Compliance with Biodiversity Net Gain (BNG) monitoring for planning applications.

Homelessness Prevention, Rough Sleeper and Domestic Abuse Grants Funding 2027/28 and 2028/29

Reporting on the three-year Government grant for homelessness prevention, rough sleeper outreach and domestic abuse services was presented. The Board were informed that the funding had been more generous than anticipated, allowing for stability and potential expansion of services.

A summary of proposals was highlighted as follows:

- Confirmation of three-year funding for existing providers.
- Removal of temporary accommodation funding from this grant and would be covered by separate revenue funding.
- Government targets were to reduce rough sleeping by 50% and reduce families in bed and breakfast accommodation.

Particulate Monitoring

The Board were presented with options for additional particulate matter monitoring following a Council motion. Current provision included three low-cost sensors in the Bromsgrove District. The proposed options ranged from extending existing sensors to commissioning a source apportionment study with the University of Birmingham. The recommended option included a combination of extended sensors and a mobile “super site” study with an estimated cost of £150k.

STANDARD UPDATES

Levelling-Up Fund Programme (Quarterly)

During various meetings, updates on the Levelling Up Projects at Windsor Street, Nailers Yard (former Market Hall site) and the Public Realm works were discussed.

The following key areas were discussed during the course of the municipal year:

22 July 2025

Windsor Street

- Groundwater monitoring was ongoing until mid-August 2025. If PFAS/PFOS (per and polyfluorinated alkyl substances) levels were high, six months of remediation would follow which was due to finish in January 2026.
- The project remained on track and within budget.
- Options paper on future housing delivery was scheduled for September 2025 to the Board and in November 2025 to Cabinet.

Nailers Yard

- The project had been delayed six weeks due to ground obstructions.
- SCP Transport Planning were preparing a travel plan and welcome pack. Some planning condition wording could change due to WCC ending Modeshift STARS.
- GJS Dillon was appointed in December 2024 to market the commercial space with early interest reported.
- The Full Business Case (FBC) was being prepared to draw down £2.425m of former Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) funds which was expected in 2026/27.
- The programme budget was originally £16.103m with an additional £1.08m awarded and planned GBSLEP funding.
- The total estimated programme costs at this stage were £18.65m.

28 October 2025

Windsor Street

- Phase One remediation was completed and Environment Agency (EA) technical feedback was expected in October 2025.
- Phase Two remediation was likely with completion estimated in May 2026.
- Cabinet was due to review housing options in November 2025.

Nailers Yard

- Culvert works costs rose to £1.6m, increasing programme costs by £165k. An urgent decision was due in August 2025 which added £500k which included £335k contingency costs.
- Completion date had moved from January to 4th May 2026.
- Strong commercial interest continued and service charge arrangements were progressing.
- FBC for GBSLEP funding was ongoing.
- Total secured funding increased to £17.694m with an estimated final cost of £19.8m.
- Potential risks identified at both Nailers Yard were culvert, electrics and layout works and Windsor Street were EA sign-off with delivery options.

6 January 2026

Windsor Street

- Phase Two remediation required six months treatment plus six months monitoring.
- Cabinet approved redevelopment in partnership with a Registered Social Landlord (RSL).

Nailers Yard

- Construction was progressing towards May 2026 completion date.
- Bruton Knowles was appointed as the property management agent.
- The pavilion building operational model was under review.

Local Heritage Action List (Quarterly)

During various quarterly updates for the Local Heritage Action List the following key areas were considered:

22nd July 2025

Following the adoption of the first tranche earlier in the year the following were noted:

- Property owners had been notified.
- The website had been updated.
- Development Management colleagues had been briefed on the local list and its implications for planning applications.
- A draft list for Wythall had been completed with consultation planned post-Local Plan consultation completion.
- Work on Lickey and Blackwell and Bromsgrove continued but progress had slowed due to staff absences and departures.
- Engagement with the Bromsgrove Society was ongoing.
- Public outreach efforts included a talk at Lickey End. Nomination forms would also be made available as part of the engagement process.

28th October 2025

- Progress on the Local Heritage List had been delayed but there were mitigation steps in place at the application stage to identify any buildings of local significance.
- The first tranche of parishes had been adopted with the website updated and owners had also been notified accordingly.
- The draft list for Wythall had been completed and work was ongoing for the Lickey and Blackwell areas.
- There were staffing challenges as two Conservation Officers had resigned. The part-time Principal Conservation Officer remained to cover the work. A consultant had been appointed to assist with the Local Heritage Lists and recruitment was also underway to fill the vacant posts.

6th January 2026

- Four parishes had adopted local heritage lists.
- The Bromsgrove draft list was expected in mid-January 2026.
- Recruitment was underway for a full time Conservation Officer who was due to start in March 2026.
- There had been an increase in development management workload.

Worcestershire Health Overview & Scrutiny Committee (HOSC)

The Council's representative on the Worcestershire-wide Health Overview and Scrutiny must be a Member of the Overview and Scrutiny Board and is required to provide the Board with regular updates on the work being carried out. The Board's representative for the municipal year 2025-26 was agreed as Councillor B. Kumar.

During the year Councillor Kumar provided comprehensive and informed updates on meetings of HOSC and responded to questions from Members on matters including:

- Routine immunisation
- Engaging Neighbourhoods and Community in Health Improvements
- Pharmaceutical Needs Assessment (PNA)
- Winter Planning
- Annual review of Public Health
- Overview from West Midlands Ambulance Service
- Access to GP Appointments (including out of hours)
- Access to NHS Dental Services

Local Government Re-organisation (LGR) (Update)

During a meeting held on 6th January 2026 the Board requested that regular updates and progress on LGR be provided.

During a meeting held on 10th February 2026 an update was provided which included:

- Worcestershire remained at Stage Three of the Ministry of Housing, Communities and Local Government (MHCLG) process.
- Two proposals had been submitted and the statutory consultation had been launched the previous week.
- A decision on implementation was expected in July 2026.
- A Countywide Programme Management Office (PMO) had been set up with Bromsgrove's Transformation Lead as Senior Responsible Officer (SRO). The focus areas included: Finance, Legal, HR, IT and Service Delivery (cross-cutting).
- An internal LGR Roots programme was supporting staff through change.
- Externally, District Councils had refreshed the partnership website for TransformingWorcestershire.co.uk.
- A new corporate LGR risk had been added to the Council's risk register.
- Residual risk was assessed as Medium, largely due to uncertainties in costings and capacity.
- Corporate risks had been redeveloped and would be reported to the Audit, Standards and Governance meeting which would be held on 17th February 2026.

During a meeting held on 24th March 2026, an update report outlined Bromsgrove's position within the Government's seven stage LGR process with Members noting were at the Statutory Consultation Stage 3, which closed on 26th March 2026.

The key points raised were as follows:

- Worcestershire remained at Stage 3 of the MHCLG process.
- Workstreams on Finance, HR, Legal, IT and Services were progressing.
- A MHCLG "Listening Meeting" took place on 11th March which was supported by KPMG.

- Devolution footprint discussions had advanced with Worcestershire Leaders having agreed a joint position with Herefordshire and exploring alignment with Warwickshire/Gloucestershire.
- Future updates may be limited until Government decisions were provided which were due in the Summer of 2026.
- LGR and Devolution remained a key Corporate Risk.
- District involvement in strategic planning (SDS) would be retained until at least April 2028.

Crime and Disorder (Yearly)

The annual statutory review outlined partnership activity from January 2025 to February 2026.

The key priority areas were outlined as follows:

- Public place violence and serious violence duty
- Anti-social behaviour (ASB), nuisance and environmental issues
- Shoplifting and neighbourhood crime
- Protecting vulnerable communities
- Serious organised crime (SOCJAG model)

The key activity delivered were outlined as follows:

- 'Right Path' youth violence intervention (with 21 young people being supported).
- Respect Programme engaging 250+ vulnerable young people.
- Redeployable Close Circuit Television (CCTV) deployments district-wide.
- Nominated Neighbour Scheme and targeted support for older/vulnerable residents.
- Domestic abuse support through R.U.N Our Space CIC.
- Significant partnership work with the Police on hotspot patrols, knife crime (Sceptre Week) and illegal vape enforcement.

It was also reported that progress was strong across priority areas despite reduced Police and Crime Commissioner (PCC) ring-fenced funding of 15% reduction. The Partnership continued to respond to complex ASB, crime prevention needs and safeguarding vulnerabilities.

Other Standard items to be heard at its April meeting were as follows:

Heatwaves Preparedness (Yearly)

The purpose of this yearly heatwave preparedness report is to ensure accountability, evaluate readiness and enhance the Council's response to rising extreme heat risks.

Overview and Scrutiny Annual Report 2025/26

This annual report.

WORKING GROUPS

Finance & Budget Working Group (FBWG)

This Group met on six occasions during the year with the Portfolio Holder for Finance and Enabling in attendance at all the Group's meetings, together with the Deputy Chief Executive (Section 151 Officer) and the Head of Finance and Customer Services.

The list below contains some of the topics/reports which the Working Group had considered and gives an insight into the work that has been carried out:

- 2025-26 Budget
- Medium Term Financial Plan 2025-26 to 2027-28 – Tranche 1 and Tranche 2 Reports
- Finance and Performance Monitoring Reports
- The Financial Outturn Report
- Council Tax Empty Homes Discounts and Premiums report
- Council Tax Support Scheme
- Council Tax and Non-Domestic Rates Discretionary Relief Policy
- Council Tax and Business Rates Yield 2025-26
- Financial Recovery Plan
- Blue Badge Holders Parking Proposal
- Ward Funds Proposal

During the course of the municipal year the following key areas were considered by the Board:

17th June 2025

Members received a report requesting for the Chairman and Members to be appointed to the Finance and Budget Working Group for the 2025/26 municipal year. Members that expressed an interest in joining the group were Councillors S. Ammar, R.J. Hunter, S.T. Nock and P.M. McDonald. The Board noted that Councillor C.A. Hotham also expressed an interest, should there be a relevant vacancy available.

22nd July 2025

With respect to membership of the Finance and Budget Working Group, it was acknowledged that interest in joining the Working Group had been expressed by Councillors S. Ammar and C. Hotham to date. The Board felt that a follow up communication was required to Members of the Overview and Scrutiny 'pool' (i.e. all elected members who were not represented on Cabinet) to ascertain if there were any further expressions of interest. It was commented that this would ensure all elected members had time to consider on whether they wished to sit on the Working Group. In this case, it was agreed that consideration of further appointments to fill vacant positions on the Working Group be deferred to the next meeting of Overview and Scrutiny Board.

The Quarter 4 Financial Outturn and Performance Monitoring Report was discussed, and Members of the Working Group had agreed that more detailed narrative was required in these reports going forward in order for Members and the public to better understand the content. The following was agreed as recommendations:

RECOMMENDED that future Quarterly Financial Outturn and Performance reports provide:

- i a detailed narrative in terms of variance for each specific service area
- ii for each area of high variance provide detail on the action(s) being taken to address the issue and the officer(s) responsible
- iii information on recharge amounts

9th September 2025

The update on membership of the Finance and Budget Working Group was discussed and Members were reminded that there were four Councillors currently represented on the Working Group as Councillors A. Bailes, E. Gray, P. McDonald and S. Nock and there remained three vacant seats. It was noted that since the last meeting of Overview and Scrutiny Board, three Councillors had expressed an interest in joining the Working Group as Councillors S. Ammar, S. Colella and C. Hotham. The Board considered these requests and on being put to the vote it was agreed that the Councillors were to be appointed to the Finance and Budget Working Group.

The Chairman of the Finance and Budget Working Group, Councillor P. McDonald, updated the Board on the recent meeting which took place on 5th September 2025.

18th November 2025

After consideration of the Finance and Budget Working Group Membership Report and terms of reference the Board agreed to maintain six Members on the Working Group. The Chairman explained that should the three current vacancies as reflected in the report remain after the Board had been approached, Members who did not sit on the scrutiny board and were also not a Cabinet Member may be appointed to fill the vacancies.

6th January 2026

After consideration of the Finance and Budget Working Group Membership report and terms of reference the Board agreed to the proposed membership of the working group for the 2025/26 municipal year. The newly appointed members included Councillors B. Kumar, C.A. Hotham and B.M. McEldowney.

10th February 2026

The Board received an update on information which was in progress for the forthcoming FBWG. Members of the Board agreed to a meeting prior the Cabinet meeting to be held on 18th February 2026 to discuss its recommendations.

TASK GROUPS

Housing Task Group

During various meetings the Board were informed of progress of the Housing Task Group. Members noted that the group were on track and had covered each of the terms of reference items for investigation in various meetings with Officers.

The Housing Task Group's final report was presented to the Board on 18th November 2025. The report would also be subsequently considered at the Cabinet meeting held in January 2026.

The following recommendations were included in the final report as follows:

Recommendation 1 – Housing Allocations

Officers approach Bromsgrove District Housing Trust (BDHT) and jointly explore a startup crisis package for residents living in social housing including the potential of an increase in housing benefit payment to cover the costs of the crisis package. The findings to be completed in three months and reported back to the Overview and Scrutiny Board.

Recommendation 2 – Housing Allocations

Bromsgrove District Council's preference is for the mix of affordable housing contained within a new development be made up of social rent and shared ownership properties only and exclude outright sales of affordable homes.

Recommendation 3 – Asset Rich and Potentially Revenue Poor

Officers provide Members with costings of bad debt owed to the Council as a result of non – payment of Council tax by residents.

Recommendation 4 – Asset Rich and Potentially Revenue Poor

Officers monitor the number of residents claiming Council Tax Support in housing Bands F, G and H (with metrics built into the performance reporting framework).

Recommendation 5 – Section (S) 106 Contributions

Where a planning application has a material impact on the local community and there is a consideration for S106 contribution allocation, the Ward Member (and neighbouring Ward Member(s)) should be informed and consulted with prior to consideration of the application. A follow up consultation with the Ward Member (and neighbouring Ward Member(s)) should also take place.

Recommendation 6 - Fleeceholding

As part of the Local Government Reorganisation process, the Council:

- a) Notes that the Government is currently analysing the feedback from the consultation which sought views on proposals to implement aspects of the Leasehold and Freehold Reform Act 2024 and further reform related to the charges leaseholders, and homeowners on freehold estates, pay and services they receive, which closed on 26th September 2025.
- b) Suggests that a new unitary authority continues to lobby Government on the matter of fleeceholding within Bromsgrove District.

For Task Groups the detailed final reports of all these investigations can be found on the Council's website within the Overview and Scrutiny section.

CONCLUSION

A significant amount of pre-scrutiny work had been carried out by the Board throughout the year and based on detailed discussions, a number of recommendations had been made to Cabinet and Full Council. Some of these recommendations were subsequently approved by the decision-making bodies. In addition to this, the work of the the Finance and Budget Working Group has been useful in providing Members with an opportunity to look at complex finance reports in some considerable detail.

During the year the Housing Task Group had completed its final report along with recommendations which were considered at the Board meeting held on 18th November 2025 and subsequently considered at the Cabinet meeting held in January 2026.

FURTHER INFORMATION

Overview and Scrutiny Board Meetings

Overview and Scrutiny Board meetings are open to the public. To find out more visit our website at <http://www.bromsgrove.gov.uk/council/the-council/overview-and-scrutiny.aspx> or telephone 01527 881288 and ask to speak to the Democratic Services Officer.

Public Involvement

If you would like to have your say on issues being considered by Overview and Scrutiny or to suggest a topic for consideration you can email scrutiny@bromsgrove.gov.uk or complete the form on the Council's website at <https://www.bromsgrove.gov.uk/council/the-council/overview-and-scrutiny/public-participation.aspx>

Giving Evidence

Members of the public or organisations with a special interest or knowledge about a particular topic being considered by Overview and Scrutiny can put forward evidence to a Committee or appear as a witness to give evidence for an investigation. If you think you or your organisation might be able to participate in an issue currently under review, please contact us.

If you have a personal issue with a Council service you may find it more useful to contact your local ward Councillor who can help you decide the best way to take it forward.

Contact Overview and Scrutiny

If you would like to find out more about any aspect of the Overview and Scrutiny Board then you can email scrutiny@bromsgrove.gov.uk or telephone 01527 881288 and ask to speak to the Democratic Services Officer.

Overview and Scrutiny

Legal, Democratic and Procurement Services

Bromsgrove District Council

Parkside, Market Street, Bromsgrove B61 8DA

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Portfolio Holder Report

Portfolio Holder Report – Health and Well-being, Leisure and Culture

Introduction and Overview:

At Bromsgrove District Council Portfolio Holders provide an annual update to Council on services within their portfolio remit. These services are delivered in accordance with the Council's Priorities, as detailed in the Bromsgrove District Council Plan 2024 - 2027.

This report provides an outline of services and activities within the remit of this particular Portfolio Holder, but with the focus on Leisure and Culture Services only on this occasion. Information is included in relation to the Council's Priorities, relevant key activities, partnership working, projects and programmes and news stories.

A version of this report, focusing on each Portfolio Holder's remit in turn, will be considered at each meeting of Council (except for the budget setting and Annual Council meetings).

Whilst services will be contributing information into this report it is worth noting that not all sections of the report will be relevant to all service areas. In this circumstance, some sections may not be completed by all services.

The report will be structured as follows:

- 1) Update on Council Priorities
- 2) Partnership working
- 3) Key activities and priorities
- 4) Good news stories and awards (if applicable)
- 5) Other

The Council has the following Priorities:

Council Priorities	Organisational priorities
Economic Development	Financial stability
Housing	Sustainability
Environment	Partnerships
Infrastructure	Organisational Culture – the 4Ps
	Budget & Resources



Portfolio Holder Report

1. Update on Council Priorities

Relevant Council Priorities – Environment and Economic Development

The Bromsgrove District Council Plan sets out the need for the Council to work in partnership to *“provide opportunities for communities to come together”* and within that *“for people to get active”*. When referring to its **Environment and Economic Development** priorities it describes an aspiration *“to elevate the quality of life, bolster economic development and ensure the safety and well-being of our residents”*.

To provide further context, as described in our Council Plan, *“over 22,000 adults in Bromsgrove (District) are considered to be physically inactive”*. We know that the evidence says that physical inactivity like this contributes to slowing down the progress of economic development and therefore the Council via this portfolio encourages our population to behave in more physically active and creative ways and connect better with the parks and great open spaces found on their doorstep. We know that this way the life expectancy divide in Bromsgrove District will decrease, people will feel better, and life chances will improve.

Leisure and Culture Vision and Aims

Following on from the council priorities the service has the following Vision and Aims.

VISION: Healthy bodies and minds through active, engaged and creative communities.

AIM: To inspire everyone to celebrate our historic past and participate in building a brighter future through access to parks, open spaces, sport, physical activity, arts, heritage, culture and everyday creativity. This way we will inspire our communities to lead longer, happier, healthier and more successful lives.

Key activities since last report:

The key activities since the last report generally relate to the implementation of the agreed Leisure and Culture Strategy and against the backdrop of LGR some other activities have been incorporated into the work of the teams. Alongside partners there is the on-going delivery of services for groups within our communities

Health and Wellbeing (links to Leisure and Culture):

Holiday Activities and Food – In partnership there has been 495 children and young people attend the holiday activities at BSLC in the last year.



Portfolio Holder Report

Physical Activity Voucher Scheme – In partnership with Public Health 244 people have received free access through Physical Activity vouchers and 21% of these have transferred on to the Activity Referral Scheme at the Centre.

Physical Activity and Creativity:

During the past 12 months, with the support of £550,000 from Arts Council England, and £30,000 from the National Trust, we have launched the ReNEW Sharing Stories Shaping Futures Skills and Capacity Development project. ReNEW (Rediscover Northeast Worcestershire) has a focus upon *skills and capacity development* designed specifically to empower our partners in the local cultural sector, as well as emerging young and diverse artists, to increase engagement with communities, economic impact in the district, and the profile of our great open spaces. We have used these funds to introduce four new jobs with a focus upon learning and participation in communities as well as the recruitment of nationally renowned arts providers Trigger Productions, Overhear and Instar.



Highly Sprung Performance working with Chadsgrove School, Waseley Hills School and HOW College at the ReNEW Launch

The *Movement for Change* project brought together over 50 partner organisations for the first time to identify joint priorities and consult on system leadership skills requirements

A series of online and in person skills development workshops have taken place to support the goals of the *Movement for Change* project



Portfolio Holder Report

Health intervention work has been delivered including Health Walks, Couch to 5k, Cancer Rehab, Fibromyalgia support, Activity Referral, Joint Effort, Healthy Lifestyles activities.

Parks and Events:

- Play Audit & Investment - play areas improved in 25/26
- Inclusive and Accessible Play policy endorsed
- Events delivered by the council for 25/26 (see photos below)
- Recommendations short- and medium-term from the Leisure and Culture strategy progressed., e.g. green flag awards.

Anticipated Activities/Key Milestones For Next Period

Health and Wellbeing:

Foster Carer Leisure Vouchers – In partnership with Public Health all Foster and Kinship carers and their families will receive a 12-month Leisure Voucher to get free access to Bromsgrove Sport and Leisure Centre.

Physical Activity and Creativity:

The ReNEW project will deliver Skills Development activities for local young people and the local cultural sector with pilot participation activities taking place with target communities (15–20-year-olds, families with older children, lower socio-economic groups, and isolated older people) from target areas that include Charford, Rubery and Catshill.

Working alongside local young people and communities with the support of Bromsgrove Society, the National Trust and nationally renowned artists (Instar) a public art gateway will be co designed that celebrates the proposed regional park “8 Hills”

Internationally renowned arts organisation “Trigger Productions” will work with Bromsgrove Carnival, local young people and the local cultural sector to tell the story of the Showman Wagon based at Avoncroft Museum of Outdoor Building. This project builds on the recent success of Cultural Compact partner (Avoncroft) who recently won the Permanent Exhibition of the Year 2026 at the National Museums and Heritage Awards

Training will be delivered for local physical activity organisations with the support of the “Movement for Change” leadership programme

Health intervention work will continue to be delivered including health walks, couch to 5k, cancer rehab, Fibromyalgia support, Activity Referral, Joint Effort, Healthy Lifestyles activities.

Parks and Events

1. Play Audit & Investment plan- play areas to be improved/implemented in 26/27



Portfolio Holder Report

Site Name	BDC Condition Rating	Play Hierarchy	Play Investment Action	Play Investment Cost (£)	Play Hierarchy Future	Priority Rating	2024-25	2025-26	2026-27	2027-28
Foxglove Way Play Area	Requires Immediate Action	Local	Agree Preferred Option	£15,000	Local	1	£15,000			
Charford Recreation Ground Play Area	Good <1 Year	Neighbourhood	Upgrade	£59,884	Neighbourhood	2		£59,884		
Kinver Drive Play Area	Good <1 Year	Local	Upgrade	£29,211	Local	2		£29,211		
Upland Grove Play Area	Good <1 Year	Local	Upgrade	£57,306	Local	2		£57,306		
Boleyn Road	Requires Urgent Action	Local	Remove Equipped Play & Enhance Open Space	£15,000	Local	2		£15,000		
Swans Length Play Area	Good 1-3 Years	Neighbourhood	Urgent Upgrade	£78,254	Neighbourhood	3			£78,254	
Hollywood Lane Play Area	Good 5+ Years	Local	Upgrade to Neighbourhood	£72,412	Neighbourhood	3			£72,412	
King George V Playing Field Play & MUGA	Good 1-3 Years	Neighbourhood	Upgrade	£35,695	Neighbourhood	4				£35,695
St Chads Recreation Ground - MUGA & Skatepark	Good 1-3 Years	Neighbourhood	Upgrade	£34,337	Neighbourhood	4				£34,337
St Chads Recreation Ground Play Area	Good 1-3 Years	Neighbourhood	Upgrade	£53,759	Neighbourhood	4				£53,759
Sanders Park MUGAs	Good 1-3 Years	Neighbourhood	Retain & maintain	£60,000	Neighbourhood	4				£60,000
Fordhouse Road Play Area	Good 1-3 Years	Local	Repairs & Maintenance	£23,452	Local	4				£23,452

Next steps:

- Kinver Drive tender will be awarded w/c 06th July 2026.
- Swans Length and Hollywood Lane tenders to go out in August 2026 with works commencing during the Autumn/Winter period.

Capital Projects:

- St Chads and Sanders Park tenders to include PIPA assessment (Accessibility and Inclusive elements) to be commissioned in Winter 2026 with works aiming to commence in Spring 2027.

Current position:

Project Code	Status	Scheme	Funding Stream	Budget	Anticipated Tender Date	Anticipated Start Date
2026 - 2027 Capital Bids						
200144	Not Started	Sanders Park Skate Park	Capital Bid	£250,000.00	Autumn 2026	Winter/Spring 27
200145	Not Started	St Chads Skate Park, Play Area and MUGA	Capital Bid	£250,000.00	Autumn 2026	Winter/Spring 27
200147	Not Started	DDA Play Area Improvements Strategic Parks	Capital Bid	£500,000.00	Autumn 2026	Winter/Spring 27
Play Area Investment Strategy						
200130	In Progress	Upland Grove	BDC Play Investment		Tender Completed	15.06.2026
200129	In Progress	Kinver Drive	BDC Play Investment	£30,000.00	Apr-26	Sep-26
200132	Not Started	Swans Length (Alvechurch)	BDC Play Investment	£78,254.00	Aug-26	Dec-26
200133	Not Started	Hollywood Lane (Wythall)	BDC Play Investment	£72,412.00	Aug-26	Dec-26

2. Inclusive and Accessible Play position

The process to employ a short-term agency Project Officer to assist with the delivery of projects post the adoption of the Leisure Strategy is underway.

Once this is completed, the current position of the Strategic Park Play Areas will be assessed for their Inclusivity and Accessibility. We are able to use RPII qualified annual inspectors to do this.

When we have the results of these assessments, we will then begin the process of creating specifications for each park to go to tender with the anticipation that works will be completed in early 2027 before the spring season.

3. Annual Green Flag sites awards Sanders Park and Lickey end
4. Café tender and refurbishment Sanders Park November 2026
5. Extension Car Park Improvements Sanders Park Start date Aug 26
6. Parish Councils Play investment and Audit 26/27 is ongoing
7. Progressing of allotment self-management
8. Events for 26/27 as below.



Portfolio Holder Report

MUSIC IN THE BAND STAND

Date & Time: Every Sunday 7th June – 13 September 2026 (excluding Sun 12th July)

Time: 2:30pm – 4:30pm

Location: Jubilee Bandstand, Sanders Park, Kidderminster Rd, Bromsgrove B61 7JP

Free concerts will be taking place at the Bandstand in Sanders Park this summer with the return of the Music at the Bandstand programme. Featuring a variety of music including silver, concert brass and jazz bands.



SUMMER FUN 2026

Dates: 23rd July – 29th August 2026

Times: between 10am – 4pm (*check individual timetables*)

Locations:

- Sanders Park, Bromsgrove

Summer Fun is a vibrant six-week programme of free weekday events taking place during the school holidays in Sanders Park.

Designed with families in mind, the programme offers a wide range of outdoor entertainment, activities, and interactive experiences to keep children and young people engaged, active, and inspired throughout the summer. From creative workshops and live performances to hands-on activities, there's something for everyone to enjoy.

Each week features a diverse mix of artists, performers, and drop-in sessions, creating a lively and welcoming atmosphere where visitors can explore new skills, build confidence, and support their wellbeing.

All activities take place outdoors, are free to attend, and require no booking simply come along and join in the fun.





Portfolio Holder Report

HALLOWEEN LIGHT TRAIL

Date & Time: Saturday 31st October 2026

Time: 4pm - 9pm

Location: Sanders Park, Kidderminster Rd, Bromsgrove B61 7JP

A free, family-friendly event that transforms parks into spooky, illuminated trails with themed zones, dazzling projections, pumpkins, and live characters. Visitors can enjoy artisan stalls, street food, funfair rides, and plenty of photo opportunities - making it the ultimate autumn adventure.



BROMSGROVE CHRISTMAS FESTIVE FUN

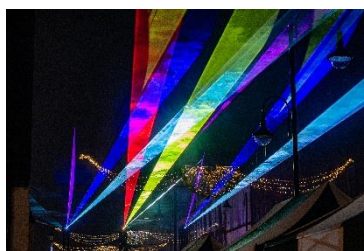
Date & Time: Saturday 21st November 2026

Time: 3pm - 5.30pm

Location: Bromsgrove High Street, Bromsgrove

A Christmas light Switch-on which includes:

- Bromsgrove Christmas Market
- Regular Saturday Market
- Funfair rides
- Laser Light & Music Show
- Live music and entertainment (Roaming entertainment and a visit from Santa Claus)



RUBERY CHRISTMAS LIGHT SWITCH-ON

Event dates: Saturday 28th November 2026

Time: 3pm – 5:30pm

Location: Co-op Carpark, 182a New Rd, Rubery, Birmingham B45 9JA

A Christmas light Switch-on which includes:

- Live music and entertainment
- Food stalls
- A visit from Santa Claus



Portfolio Holder Report



9. Partnership Working:

Partnership working:

The Council works with a range of partner organisations to meet the needs of residents and businesses in the district. The following section details work delivered within the remit of this Portfolio.

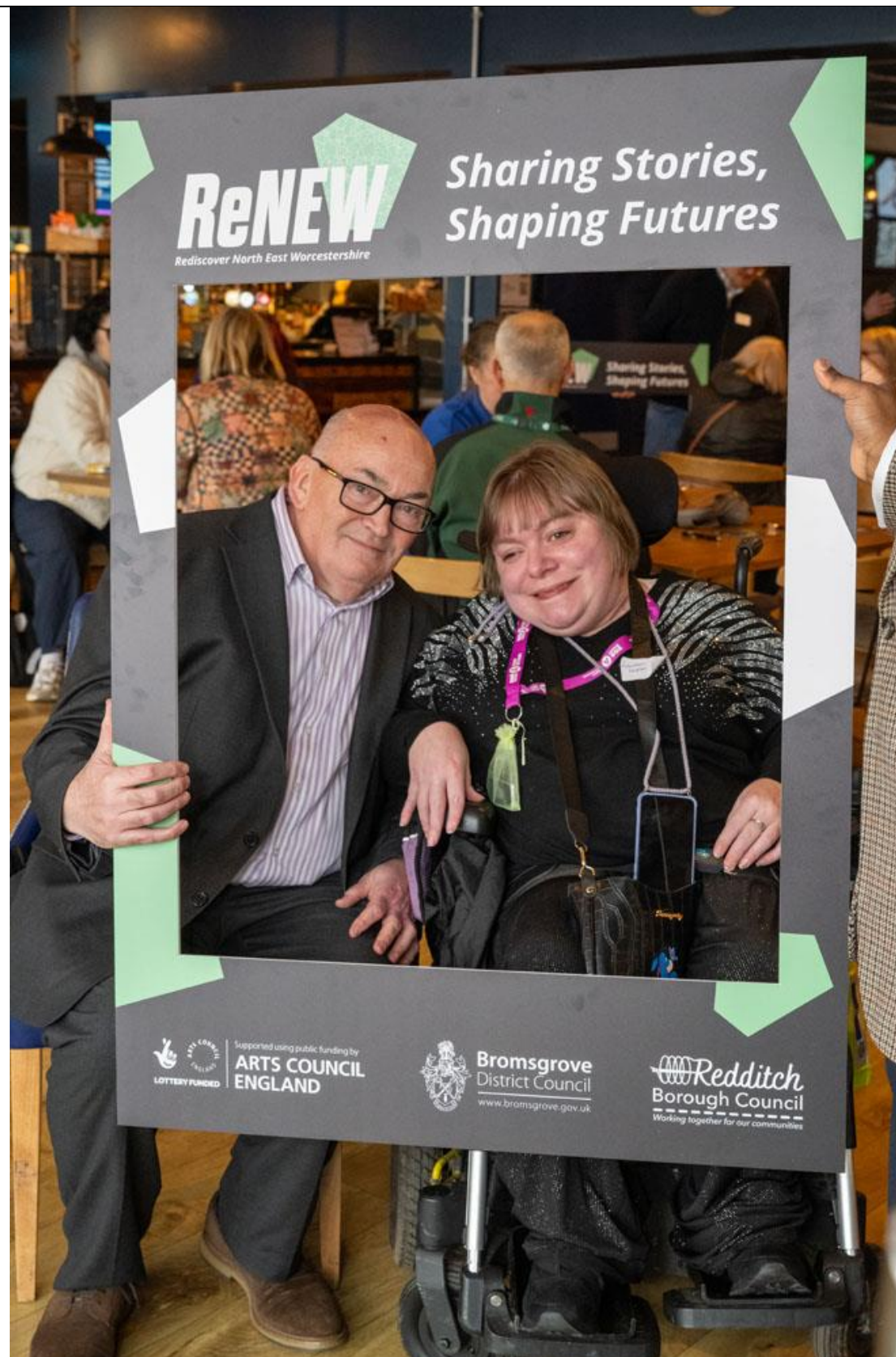
Health and Well-being:

Through the management agreement of Bromsgrove Sport and Leisure Centre the Council continues to have a strong partnership with Everyone Active. This includes partnership working within the centre and externally at events. The partnership has also extended to working with Everyone Active as well as Worcestershire Public Health in a number of multi partnership initiatives.

Physical Activity and Creativity:

We facilitate three place-based partnerships 1) *Cultural Compact for North East Worcestershire* with a focus upon arts, heritage and culture 2) *Movement for Change Partnership* which oversees a systems leadership programme focused on increasing physical activity, and 3) *Indoor and Outdoor Leisure Facility Partnership* that oversees the delivery of our Playing Pitches and Built Sport Facility Strategies.

A broad range of partners are supporting the work to include the National Trust who have recently contributed £30,000 towards creative community engagement work as well as Worcestershire Wildlife, Canal and Rivers Trust, Heart of England Forest, Bromsgrove and District Primary Care Network, Active Herefordshire and Worcestershire, Arts Council England, Sport England, National Governing Bodies for Sport including the FA, England Rugby, and England Cricket, Young Solutions and Access and Inclusion champion Leanna Horne.



Pete Sugg CEO of Young Solutions and local Paralympian Leanna Horne (Chairs of the Youth Theme Group and Access and Inclusion Theme Group for the Cultural Compact for North East Worcestershire)



Portfolio Holder Report

Parks and Events:

Partnership work with the Bromsgrove Carnival Committee has supported the delivery of the Green Thread element of the recent Garden of Alchemy as part of the wider event.

The Rubery Festival Committee liaises with the council and residents can enjoy the Rubery light switch on

In terms of Allotment Self-Management Development, the council supports allotment associations to develop the skills, governance, and capacity needed to become effective self-managed groups.

10. Good News Stories and Awards (if applicable)

Physical Activity and Creativity:

Four new two-year fixed term Bromsgrove District Council jobs have been created with Arts Council England funding to spearhead the delivery of the ReNEW Sharing Stories Shaping Futures project. Two of the new team are local young people who become full time Learning and Participation Level 3 Apprentices. Their job is to work alongside local young artists, communities and the local cultural sector to tell the unique story of North Worcestershire and deliver skills and capacity development opportunities.

Nationally renowned arts organisations Trigger Productions and Instar will support the delivery of the ReNEW project with the support of the Cultural Compact for North East Worcestershire partners including Young Solutions, Avoncroft Museum, Bromsgrove Arts Alive, Bromsgrove Society, Canal and Rivers Trust, Bromsgrove Carnival and the National Trust.

Bromsgrove District Council – Council Meeting 15th July 2026

Recommendations from the Cabinet meeting held on 17th June 2026

Shared Homelessness Strategy 2026 - 2031

RECOMMENDED that the Shared Homelessness and Rough Sleeping Strategy 2026-2031 be approved.

Enforcement and Civil Penalty Policy

RECOMMENDED that

- 1) Delegated authority be granted to the Assistant Director Community and Housing Services, following consultation with the Portfolio Holder for Housing, to update the Policy in line with any legislative or government guidance updates; and
- 2) The Scheme of Delegations be updated to reflect the adoption of the Policy and the new Enforcement powers under the Renters Rights Act 2025 in accordance with the wording set out in Appendix B (Appendix 2 to the Cabinet minutes).

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**Cabinet
2026**

17th June

Final Shared Homelessness Strategy 2026-2031

Relevant Portfolio Holder	Councillor Sue Baxter
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Judith Willis, Assistant Director Community and Housing Services
Report Author: Lead Officer	Job Title: Amanda Delahunty Contact email: a.delahunty@bromsgroveandredditch.gov.uk Lead Officer Tel; 01527 881269
Wards Affected	No Specific Ward Relevance
Ward Councillor(s) consulted	Not Applicable
Council Prioritie(s)	
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

Cabinet is requested to RECOMMEND that: -

- 1) The Shared Homelessness and Rough Sleeping Strategy 2026-2031 (Appendix A) be approved.**

2. BACKGROUND

- 2.1 On the 25th March 2026 members resolved that :

“the draft Shared Homelessness and Rough Sleeping Strategy 2026-2031 and action plan be approved for public consultation for six weeks starting 13th April 2026”

- 2.2 As previously reported the Homelessness Act 2002 requires all housing authorities to have a homelessness & rough sleeper strategy in place which is based on a review of all forms of homelessness in their local authority area.
- 2.3 It is intended that this Strategy will sit under the existing Worcestershire Strategic Housing Board Plan.
- 2.4 The consultation responses have been considered and included where appropriate. MHCLG have reviewed the strategy and provided

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separate feedback. They are satisfied that the action plan covers all the main areas and sets out clear and consistent actions and measures.

- 2.5 MHCLG has also provided the metrics required for the Local Outcomes Framework. These are now included, with the exception of the metric on successful prevention and relief outcomes for individuals with three or more support needs, which is the only metric not currently published. The Strategy will be updated to reflect this once it is published and the metrics below reported under the heading of Shared Homelessness Strategy 2026-2031 via the Corporate Performance monitoring process:

2.6 **Core outcome measures (metrics)**

The framework uses a small set of **national outcome indicators** (largely from MHCLG statutory data) to assess performance:

- Rate of households with children in temporary accommodation (per 1,000 households)
- Number of families in Bed & Breakfast accommodation for over 6 weeks
- Percentage of duties owed where homelessness was prevented or relieved
- Number of people sleeping rough on a single night (snapshot count)
- Number of people sleeping rough over the month who are long-term rough sleepers

These will be the primary performance indicators used nationally to judge whether local areas are reducing homelessness and rough sleeping.

- 2.7 We have ensured that our action plan includes targets against each of the metrics in the Outcomes Framework, and a description of how, working with partners, those targets will be achieved. The key numerical targets are achieving less than 6 week hotel placements for families and halving monthly long term rough sleeping numbers by 50% by the end of this parliament. The other targets relate to successful prevention and relief outcomes increasing while rough sleeping and families in temporary accommodation reduce.
- 2.8 Above universal prevention, we have included reference to the supply of affordable housing and the effective use and allocation of social housing stock.

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- 2.9 We have reviewed our approach to rough sleeping and single homelessness. This is to ensure that services move away from verification as a way to access services and ensure a robust approach to assessment, identifying people at risk of, or experiencing, homelessness or rough sleeping quickly and assessing risk and need in order to direct services.
- 2.10 In respect of children and young people we have strengthened our approach to partnership working with Children's Services and the Care Leavers Team. This is to prevent homelessness legislation from being used as a pathway to house care leavers following the end of a Looked After Child Placement and ensuring more support is provided to care leavers in their transition to adulthood and independent living.
- 2.11 We have strengthened our approach to the Domestic Abuse Safe Accommodation Duty where B&B is not considered suitable or safe accommodation so that we strive to end the use of B&B in these cases.
- 2.12 In regard to temporary accommodation we have included a requirement to develop a policy to ensure temporary accommodation is suitable to safeguard and promote the welfare of children.
- 2.13 We have placed greater emphasis on tenancy sustainment and budgeting support as part of efforts to prevent repeat homelessness.

3. OPERATIONAL ISSUES

- 3.1 The delivery of the Shared Homelessness and Rough Sleeper Strategy actions will be overseen by the Housing Strategy Team and will sit under the existing Worcestershire Housing Board Plan.

4. FINANCIAL IMPLICATIONS

- 4.1 The new Homelessness, Rough Sleeping and Domestic Abuse Grant will provide funding to develop services to support the strategy and a report has already been taken to members to provide the detail on spending priorities for the next three years.

5. LEGAL IMPLICATIONS

- 5.1 The Council has a duty under the Homelessness Act 2002 to conduct a review of the nature and extent of homelessness in its District every 5 years and to develop a strategy setting out how services will be delivered in the future to tackle homelessness and rough sleeping.
- 5.2 The Homelessness Reduction Act came into force in April 2018, and places new legal duties on local housing authorities so that everyone

**Cabinet
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who is homelessness or at risk of homelessness will have access to early meaningful help, irrespective of their priority need status, so long as they are eligible for assistance.

- 5.3 The Domestic Abuse Act 2021 requires local authorities to collaborate with Tier One authorities to provide safe and supported accommodation for victims/survivors of domestic abuse.
- 5.4. The Renters Rights Act 2025 shifts the local authority role from discretionary enforcement to a mandatory duty to enforce landlord legislation. The abolition of Section 21 no fault evictions is likely to result in more tenancies being ending by Section 8 Notices for rent arrears and provides an opportunity for local authorities to work with landlords to, wherever possible, sustain tenancies. The Council has utilised Homelessness, Rough Sleeping and Domestic Abuse grant to provide a new service with Citizens Advice to support this work.

6. OTHER IMPLICATIONS

Local Government Re-organisation

- 6.1 LGR does not alter the statutory homelessness duties set out under the Homelessness Reduction Act 2017 and Housing Act 1996, including prevention (s.195), relief (s.189B), interim accommodation (s.188) and the duty to provide free advice and information (s.179).
- 6.2 The Government's National Plan to End Homelessness sets out a cross-government expectation that homelessness cannot be reduced without multi-agency integration
- 6.3 Both the National Plan to End Homelessness and the Homelessness Code of Guidance stress the need for coordinated arrangements across the below areas,
 - health
 - social care
 - children's services
 - criminal justice
 - and domestic abuse services

and it is considered that the most appropriate method is to have a shared strategy approach across as much of Worcestershire to ensure there is a coherent approach to our homelessness duties until the results of LGR are provided.

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- 6.4 A single Homelessness & Rough Sleeping Strategy must be produced for any new authority, and this strategy and action plan has been produced so that it is able to be incorporated into either one or two unitary authorities until a new single strategy for the new area, based on a fresh homelessness review is completed as required by the Homelessness Code of Guidance

Relevant Council Priority

- 6.5 Housing – The strategy provides a framework for a range of services which support this Council priority.

Climate Change Implications

- 6.6 There are no direct climate change implications from the strategy itself but individual actions/services may have an impact.

Equalities and Diversity Implications

- 6.7 An Equalities Impact Assessment has been undertaken as the strategy seeks to deliver a range of services for homeless households and draws on ways to improve the work of the Council in developing services and preparing links, pathways and referrals between services to prevent homelessness in the first place or minimise its impact when it happens.
- 6.8 The design of services which tackle the root causes of homelessness such as poverty, health inequalities and adversity in childhood will include ensuring that providers have appropriate policies and training in place to make sure that there is no adverse impact on equalities groups with protected characteristics under the Equalities Act 2010.

7. RISK MANAGEMENT

- 7.1 If the strategy is not approved the Council will not be legally compliant. Furthermore, it is likely that more households who are threatened with homelessness, or who are in housing need, will have limited options for support to sustain their accommodation or find alternative suitable accommodation that meets their needs. If they have to make a homeless approach this could lead to the following negative outcomes:

- Increased B&B costs
- Increased rough sleeping in the District
- Impacts on physical and mental health, educational achievement, ability to work and similar through increased homelessness

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2026**

17th June

8. APPENDICES and BACKGROUND PAPERS

Appendix A – Shared Homelessness Strategy
Appendix 1 – Action Plan

Background Papers

Report to Cabinet 25th March 2026 [Link to Cabinet report from 25th March 2026](#)

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Sue Baxter Cabinet Member for Planning and Strategic Housing	27.5.26
Lead Director / Head of Service	Judith Willis Assistant Director Community and Housing Services	27.5.26
Financial Services	James Walton, Director of Finance	27.5.26
Legal and Democratic Services	Nicola Cummings – Principal Solicitor – Governance and Jess Bayley-Hill, Principal Democratic Services Officer	27.5.26
Climate Change (if climate change implications apply)	Matthew Bough Strategic Housing & Business Support Manager	N/A

Homelessness and Rough Sleeping Strategy

2026 - 2031

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Our Vision - to end homelessness and rough sleeping and where it has not been possible to prevent it from occurring, ensure that it is rare, brief and non-recurring

Agenda Item 15a

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Foreword

Chair of Worcestershire Housing Board

I am proud to introduce this shared Homelessness and Rough Sleeping Strategy 2026-31 for Bromsgrove District Council, Malvern Hills District Council, Redditch Borough Council, Wychavon District Council and Wyre Forest District Council.

Homelessness and rough sleeping remain among the most visible and urgent challenges facing our communities today. They are stark reminders of inequality, vulnerability, and the need for collective action. It is not simply the absence of a home, but the absence of security, dignity, and opportunity. Every child should grow up with the security of a home, and every adult deserves a safe place to live that provides stability and where they have a chance to thrive.

Tackling homelessness and rough sleeping continues to be of utmost importance for each of the councils involved in developing and delivering on this strategy.

Our vision, aligned with the Government's national strategy, will focus on 5 pillars to end homelessness:

Universal prevention: tackling the root causes of homelessness across the whole population.

Targeted prevention: providing tailored support to people who are more likely to face homelessness.

Preventing crisis: early identification of people who need help and putting in place personalised interventions that meet their needs.

Improving emergency responses: to ensure that if people do become homeless, they receive high quality support and that homelessness is brief.

Recovery and preventing repeat homelessness: helping people rebuild their lives with the right support.

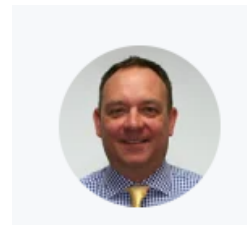
This strategy will also take a renewed approach to the support and intervention for families with children in temporary accommodation to minimise the associated risk and long-term impact this has on them.

We recognise that homelessness is not simply a housing issue, but a complex social challenge shaped by health, employment, family breakdown, and wider economic pressures. Tackling homelessness requires collaboration across government, local authorities, health and social care, the voluntary sector, and communities themselves. That is why we have developed this strategy in collaboration with a range of stakeholders, which is essential to the successful implementation of our vision, as well as with the voice of those with lived experience of homelessness.

I would like to take this opportunity to thank all the organisations and individuals who have contributed towards the development of this strategy.

Governance will sit with the Worcestershire Housing Board- recognising that tackling homelessness not only benefits the individual but also benefits the economy, the health of our population, reduces crime and disorder and reduces costs for the taxpayer.

This strategy will govern our approach for five years and will see us beyond Local Government Reorganisation (LGR). However, given our experiences over recent years in tackling homelessness and the ever-changing landscape, it is vital that it remains responsive and will be kept under constant review.



Vic Allison, Chief Executive of Malvern Hills and Wychavon District Councils and Chair of the Worcestershire Housing Board

1. Introduction

Our vision is to **end homelessness and rough sleeping and where it isn't possible to prevent it from occurring, ensure it is rare, brief and non-recurring.**

We will tackle homelessness and rough sleeping through our work on the 5 pillars to end homelessness in line with the Government's National Plan to End Homelessness: universal prevention, targeted prevention, preventing crisis, improving emergency responses and recovery.

The district councils collaborating on the development and implementation of this strategy have a proven track record of working closely together to prevent and tackle homelessness across our districts. This is the third shared homelessness strategy to be developed, and the achievements of our last strategy are highlighted below.

1.1 Achievements of the last strategy

The previous Homelessness and Rough Sleeping Strategy 2022 - 2025 was developed by all six Local Housing Authorities (LHAs) in Worcestershire and focused on the then three main tenets of the national strategy: *prevention, intervention and recovery* as well as increasing the supply of temporary and permanent accommodation.

- Established a **countywide Homelessness and Rough Sleeping Strategy Group**.
- Developed a **Prison Leavers Protocol** and the pre-release homeless panel.
- Developed **stakeholder involvement and People With Lived Experience (PWLE) in reviewing services** through regular countywide meetings, bespoke focus groups, and questionnaires.
- Quarterly **reviews of data collection and deep dives into client groups** to inform decision making and share learning.

- **Joint training** in homelessness, Mental Capacity Act, psychologically informed environments, Care Act 2014, Complex Adults Risk Management framework, self-neglect etc.
- Support for those with mental health illnesses through development of **Mental Health Link Worker posts** and non-medical interventions
- **Delivery of the Rough Sleeper initiative** (target 563 p.a):
 - 2024/25 - **637 people supported**
 - 2023/24 - **837 people supported**
 - 2022/23 - **713 people supported**
- **Housing and support plans developed for the Target Priority Group (TPG)** (the most complex rough sleepers)
- **Cost of living plans, welfare assistance and bespoke support** to reduce homelessness developed across the county
- **Safe accommodation units set up for survivors of domestic abuse**
- **Supported provision of domestic abuse support services** including through the Domestic Abuse Support Service (West Mercia Women's Aid), Sanctuary Scheme and Domestic Abuse Coordinator and specialist Housing Officers (all councils)

There are also some actions from the previous strategy that are still underway at the time of writing this strategy including:

- Undertaking a **review of peer support models** in place in some areas of the county to share learning and best practice and explore whether the models could be expanded.
- **Explore opportunities for a greater range of supported and stop-down accommodation** available following the supported housing needs assessment and strategy. The Supported Housing (Regulatory Oversight) Act 2023 has yet to be implemented so this action was deferred.

1.2 The current situation: homelessness review

To inform and provide the evidence base for the strategic objectives and actions within this strategy, a homelessness review was undertaken.

The review includes a compilation of homelessness data and trends, mapping of services and analysis of gaps in provision, service provider feedback and the feedback of People With Lived Experience (PWLE). We also held a stakeholder engagement event in September 2025 to gather the views of statutory and voluntary sector organisations and co design the strategy.



1.3 The plan to prevent and tackle homelessness in our districts: long-term vision and short-term priorities

In line with the Government’s national strategy, our long-term vision is to end homelessness and rough sleeping and where it isn’t possible to prevent it from occurring, that it is rare, brief and non-recurring.

Our strategy and action plan are centred around the 5 pillars to end homelessness as set out in the national strategy:

1. Universal prevention: tackling the root causes of homelessness across the whole population.
2. Targeted prevention: providing tailored support to people who are more likely to face homelessness.
3. Preventing crisis: early identification of people who need help and putting in place personalised interventions that meet their needs.

4. Improving emergency responses: to ensure that if people do become homeless, they receive high quality support and that homelessness is brief.
5. Recovery and preventing repeat homelessness: helping people rebuild their lives with the right support.

The action plan defines our priorities over the next 5 years to achieve our vision, and contains short-, medium- and long-term priorities.

1.4 Strategy structure

The strategy firstly explores the local issues that need to be addressed against each of the five pillars in the national strategy, based on the Homelessness Review undertaken in 2025.

Secondly it defines how we will take action to address local issues through the Strategy Action Plan, the Homelessness and Rough Sleeping Strategy Group and local homelessness partnerships, and comprehensive governance arrangements under the Worcestershire Housing Board.

Finally, it outlines the funding and resource available to implement the strategy and deliver services.

1.5 Partnership working to codesign the strategy

The LHAs recognise the role our statutory and voluntary sector partners play in supporting the work we do, and how they go beyond the delivery of our statutory services through providing complimentary statutory and non-statutory services. However, this strategy is focused primarily on the role of LHAs and in meeting their legal responsibilities. It is a legal obligation of the LHAs to have a strategy in place and for it to be compliant with the Homelessness Act 2002. In developing the strategy, we have followed the legislative and good practice guidance and reviewed homelessness strategies from across the country.

2. Pillar 1: Universal prevention – tackling the root causes of homelessness

2.1 Increasing the supply of social and affordable housing

The Worcestershire Housing Strategy 2023-40, developed by the six Worcestershire LHAs and partners provides a long-term housing strategy for Worcestershire centred around four priority areas:

- Economic growth and jobs
- Quality and standards
- Health and wellbeing
- Net zero carbon and climate change

Specifically in relation to housing growth, the focus is on developing a 5+ year public sector pipeline of development sites, and the development of housing delivery capacity e.g. the exploration of direct delivery housing models for those LHAs who do not currently have this capacity.

There are two established delivery groups working to implement Housing Strategy actions and these are overseen by the Worcestershire Housing Board, which also oversees the implementation of this Homelessness and Rough Sleeping Strategy. This arrangement will ensure synergy between the two strategies.

In terms of permanent housing all the councils collaborate with developers and registered providers to deliver market and affordable housing across the county. This work is underpinned by the councils Local Plans which identify a wide range of tenures and types of housing including low-cost home ownership and social/ affordable rent properties.

There is a shortage in the supply of housing, particularly in the provision of affordable housing with an annual requirement of all housing tenures of approximately 1,911 per annum across the districts that share this strategy.

Local Plan numbers are informed by a combination of the standard methodology requirement, Housing Market Assessments and Housing Needs Surveys to determine the required mix of housing.

2.2 Making the best use of existing housing and that it is allocated to those who need it most

All LHAs sharing this strategy have their own allocations policies to ensure that much needed affordable housing is allocated to those who need it most. In each LHA area, the demand for affordable housing far outstrips supply. At the time of writing, Local Government Reorganisation could see the abolition of all six district councils in Worcestershire and the introduction of one or two unitary authorities and with it the requirement to develop new allocations policies for the new organisation(s).

Feedback from the Homelessness and Rough Sleeping Strategy Stakeholder Event indicated that partners felt that the “managed move” process whereby Registered Providers (RPs) move households within their own stock and therefore negating the need for a homelessness approach could be an area to try to seek consistency on. This would mean less upheaval for households and reduced service demand on local authority housing teams.

The councils also collaborate with registered providers to ensure best use is made of existing stock including tackling under occupation and low demand schemes.

Whilst evictions from social housing are relatively low locally as they are nationally, there are more opportunities to prevent homelessness from social housing tenancies at an earlier stage through the establishment of pre-eviction panels and improved collaborative working. The government references a new toolkit in the National Plan to End Homelessness to provide advice for providers and councils on strengthening tenant engagement to reduce homelessness risks.

2.3 Supported housing

As with general needs affordable housing, the demand for supported housing is far higher than the supply locally and nationally. People need supported accommodation for a range of reasons e.g. young people needing support with life skills, people with mental health needs, people with substance misuse needs, survivors of domestic abuse. Some cohorts of homeless households will need more than just a housing solution to lift them out of homelessness and will require a sustainable, supported, and appropriate environment.

The Government's new Social and Affordable Homes Programme includes new flexibility for accommodation where the level of design and adaptation results in higher costs and calls on providers to produce ambitious bids for new supported housing.

The Worcestershire Housing Strategy delivery groups are exploring opportunities with RPs to deliver supported housing.

To improve standards across existing supported accommodation and tackle rogue landlords the government is introducing a new licensing regime following the consultation on the Supported Housing (Regulatory Oversight) Act 2023. As part of the implementation of this Act, the councils will be required to develop a Supported Housing Strategy by 31st March 2027.

2.4 Private rented sector accommodation

The Renters Rights Act seeks to give more security to tenants by abolishing section 21 'no fault' evictions which has been a significant cause of homelessness across the districts. The Act also brings with it a range of other measures to strengthen tenants' rights e.g. empowering tenants to challenge unreasonable rent increases, bringing an end to rental bidding and reducing barriers to accessing private rented accommodation such as outlawing discrimination against prospective tenants with children or who receive benefits, and preventing landlords from charging high rent in advance payments.

Making sure both tenants and landlords understand their rights under the Act will play an important part in reducing the risk of homelessness.

For the first time, the Act also includes the provision for councils to issue civil penalties against landlords who evict their tenants illegally.

Whilst the local authorities sharing this strategy welcome the intention of this legislation, there remains concern that the Act will lead to private landlords exiting the market prior the major implementation milestones e.g. no-fault evictions being removed in May 2026, which may lead to a spike in homelessness. Measures to mitigate this situation are considered within the strategy action plan.

As there is not enough social housing to meet demand, helping people to access private rented accommodation remains a priority across the districts - through rent deposits, bonds and private sector leasing schemes.

The councils will also be considering as part of this strategy how they can build relationships with private landlords to both improve access to private rented accommodation and prevent homelessness from private rented accommodation e.g. by encouraging landlords to work with the councils if they have a tenant who is at risk of homelessness.

Work with private sector landlords and letting agents also enables councils to meet some housing needs in parts of the county, although local housing allowance rates do make this challenging. The councils have been innovative in attracting landlords to provide accommodation through landlord forums, the use of rent bonds and deposits, social letting agencies and private sector leasing schemes, and this will continue during the lifetime of the strategy.

It should be noted that in some areas of the county, there are particular pressures on private sector accommodation with both Home Office and criminal justice providers looking to purchase/lease private rented sector accommodation for asylum seekers and prison leavers. In some cases, this has led to homelessness situations as existing tenants are served with notice and has led to reducing private sector accommodation available to homeless households.

2.5 Maximising income, financial inclusion and welfare assistance

Supporting low-income households to be able to pay their rent and other essential living costs to sustain their accommodation is critical to preventing homelessness. Recent years funding from the Household Support Fund, and Discretionary Housing Payments have led to some positive outcomes locally in the face of the cost-of-living crisis. It is expected that the new Crisis Resilience Fund will build on this bespoke approach.

Some councils involved in this strategy also have specialist Financial Inclusion Officers who work directly with people making homeless approaches due to rent arrears who are struggling with the cost of living. Their role is to ensure that their income is maximised

through ensuring they are receiving correct benefit entitlements, assistance to apply for benefit back payments and working with local services to increase their income through quality employment. Help is also provided by tenancy sustainment or support workers on issues like budgeting and maximising benefit entitlement,

Continuing to provide discretionary welfare support to ensure low-income households do not become homeless is a key priority for this strategy and action plan.

3. Pillar 2: Targeted prevention – targeted support for people at risk of homelessness

3.1 Collaboration to prevent homelessness

The LHAs and partner agencies have a proven record of working collaboratively to prevent homelessness. The Worcestershire Housing Board comprises of senior officers from across sectors who oversee the implementation of housing and homelessness strategies. A countywide Homelessness and Rough Sleeper Strategy Group has been in existence for many years comprising of LHAs, MHCLG, statutory and voluntary sector partners.

Feeding into the countywide group, each LHA has a local homelessness partnership. This arrangement will continue to provide assurance that the strategy action plan is implemented, outcomes are achieved against the strategy targets - and that people that are at risk of homelessness are identified early and linked into the right housing and support services.

The government intends to introduce a new ‘duty to collaborate’ requiring public services to work together to prevent homelessness and support those at crisis point. Locally we developed a ‘commitment to refer’ which goes beyond the existing ‘duty to refer’ which requires certain public bodies to notify the LHA should they identify a household who may become homeless within 56 days. This is in recognition that there are many partners who will identify a potential homelessness situation and not just those included in the legislation.

It is the intention of this strategy to scrutinise adherence to the duty to refer locally and prepare for the new ‘duty to collaborate’.

3.2 Addressing barriers to accessing services

Some groups of people face barriers to accessing services because they may not be delivered in a way that meets their needs. For example, an action in the previous homelessness strategy was to understand the barriers for women rough sleepers in accessing services that are often communal provisions for both male and female rough sleepers. This work is ongoing at the time of writing this strategy. We also know that young people, care leavers, people from ethnic minority backgrounds, disabled people and LGBT+ people also face barriers.

For young people and care leavers the LHAs and Children’s Services work closely together and have developed a longstanding Care Leavers Protocol and a 16/17-year-old Protocol to clarify joint working arrangements. Each district has supported accommodation for young people, which in recent years has been at risk due to a change in funding structures and has meant LHAs have needed to meet the shortfall in County Council funding. It is a priority for supported accommodation to be in place for homeless young people in order for them to have a safe and supported environment for them to develop the necessary life skills needed to live a successful future life. In 2021 Wychavon District Council bought and refurbished a 10-room property to provide supported accommodation for young people and have also committed to purchasing a further property in its latest council plan.

Locally we also know that people with a physical disability can find it hard to access adapted temporary accommodation due to the lack of availability. This can then lead to extended stays in hospital and a delay in discharge. Wyre Forest District Council opened a new temporary accommodation facility in 2025 which includes a small number of fully adapted rooms. Our intention is to explore opportunities to work with colleagues across the health system to increase the availability of adapted temporary accommodation.

We also know locally that people with multiple and complex needs face barriers to accessing accommodation, for example those that are using drugs and alcohol and with mental health support needs. Worcestershire Public Health have developed a Memorandum of Understanding between services to address this issue.

Working with People With Lived Experience (PWLE) of homelessness and accessing services is also a priority for this strategy as it is critical that we design accessible, inclusive and culturally sensitive, trauma informed services.

We already regularly undertake lived experience engagement with certain groups, for example survivors of domestic abuse and rough sleepers. However, we are seeking to go further with this strategy and ensure PWLE are contributing to, and overseeing, the strategy actions and performance via the Countywide Homelessness and Rough Sleeping Group.

3.3 Interventions to prevent homelessness for higher risk groups

There are many challenges that affect the higher risk groups and these include a severe housing shortage, silting up or undersupply of supported accommodation especially for those with complex needs and some poor-quality supported accommodation.

3.3.1 Single people

Single homeless households make up 57% of all housing register applicants across the districts, with the largest group being single adults aged 35-65 (26%).

Between 2022-2025, 54% of applicants owed a homeless duty were single adults:

65% were already homeless (relief duty)
37% were threatened with homelessness (prevention duty)

Single homeless people often face multiple needs: mental ill health, substance misuse, social isolation, and barriers to employment. Many do not qualify as having a priority need under legislation, limiting access to settled housing and statutory support. They are overrepresented among rough sleepers and those in insecure arrangements (e.g. sofa surfing), leading to poor health, social exclusion, and instability. Even those without vulnerabilities struggle due to unaffordable rents and precarious finances.

This homelessness strategy aims for early intervention, clear routes to housing, and multi-agency collaboration (local authorities, housing providers, health, probation, voluntary sector).

The LHAs use national homelessness funding to provide both accommodation-based and floating support, rent deposits and rent in advance to help access accommodation and No First Night Out/No Second Night Out provision and access to furniture.

3.3.2 Prison leavers

A small but significant number of homeless applications are from those leaving prison. We hold fortnightly prison meetings to ensure that where a Duty to Refer has been made, individuals are provided with a homelessness assessment prior to release wherever possible.

However, housing options are often limited due to the individual not meeting the priority need threshold under homelessness legislation. With limited supported accommodation available, Community Accommodation Service (CAS3) accommodation has provided a much-needed lifeline for those who otherwise might be released without an accommodation offer which may result in rough sleeping.

Recalls from this accommodation remain a concern (circa 50%) and a

positive housing pathway from CAS 3 accommodation needs to be explored.

3.3.3 Rough sleepers/those at risk of rough sleeping

Rough sleeping can be a dangerous and isolating experience. People who sleep rough are more likely to be victims of crime and violence. The longer a person remains on the streets, or actively engages in street life culture, the more likely it will have significant implications on their physical and mental health. Female rough sleepers are particularly at risk and may require specialist or women only services to address their needs. Safeguarding is therefore particularly relevant to these groups.

The Worcestershire official street count held each year shows fluctuating levels of rough sleeping across the county, with numbers in recent years remaining fairly static.



Rough sleeper data is collated each week improving our local intelligence of the flow, return, and stock of individuals and the reason behind their homelessness. Regular rough sleeper/prevention meetings and multi-agency meetings are held at a local level enables

the co-ordination of services and information sharing to develop partnerships with all organisations and individuals committed to ending rough sleeping and homelessness. This includes a consideration of any safeguarding issues that need to be flagged with partners or referred to the Adult Safeguarding Team. All five councils have rough sleeper outreach teams providing intensive support and routes into accommodation such as No First / No Second Night Out, Housing First/Led and other services.

Progress has been made in tackling health inequalities with increased access to health services and countywide drug and alcohol support, including harm reduction teams. Outreach teams have strengthened their practice by signing up to Homeless Link’s outreach principles and undertaking learning and development.

Although Supported Housing providers in Worcestershire work within a trauma informed, person centred approach, those clients with substance misuse, serious mental health conditions and/or a history of arson may find themselves waiting for a suitable placement due to stringent accessibility criteria. There is also limited availability of rapid access supported accommodation resulting in an individual’s only accommodation option being outside of the county.

We will also expand the multi-agency work on Target Priority Group rough sleepers and expand the Mental health and Homelessness Group so that multi-agency working is consistent across all districts and there is effective cross boundary working.

Therefore, the strategy will continue to promote collaborative working with health partners, housing providers and other organisations to improve access to services for rough sleepers including early intervention for those at risk and accommodation for those with complex needs.

3.3.4 Young people and care leavers

Homelessness for young people remains significant issue. This includes from people aged 16-17, Care Leavers and young parents. Many young people will have support as well as accommodation needs as they leave home for the first time.

Changes to the benefits system together with the impact of the cost-of-living crisis, and the number of young people in low paid work, has seen a rise in the number of those at risk of homelessness.

For young people the data indicates that the most common causes of homelessness in Worcestershire are family or friends being no longer willing to accommodate, the loss of private rented accommodation and relationship breakdown with partner (non- violent breakdown).

Whilst services do work closely together, there is still more to be done to prevent young people from becoming homeless. It is a focus of this strategy to enable more upstream homelessness prevention through family mediation and identifying potential homelessness situations at the earliest stage e.g. via schools and other relevant sectors/organisations.

3.3.5 Families with children

Worcestershire continues to be an attractive place to live and work, inevitably leading to high rents and house prices. This means some families are unable to afford to own or privately rent a home. Changes to the benefits system together with the impact of the cost-of-living crisis and the number of people in low paid work has seen a rise in the number of families at risk of homelessness.

We want to prevent homelessness by identifying the key risk factors/triggers in families lives that can lead to a family being at risk of homelessness at the earliest possible stage.

Families in Worcestershire access social housing registers for a variety of reasons, often reflecting both long-term housing challenges and immediate triggers that place them at risk of homelessness. The key reasons include:

- **Relationship Breakdown**
Non-violent relationship breakdowns, particularly involving partners, remain a significant factor. Families in this situation often require alternative accommodation to prevent homelessness or unsafe living conditions.
- **Domestic Abuse**
Domestic abuse is a major reason families seek housing support. Increased awareness of available services and support pathways has led to earlier reporting and engagement with housing services.
- **Loss of Private Rented Accommodation**
The end of an assured shorthold tenancy in the private rented sector, whether due to eviction, rent increases, or landlord decisions, continues to trigger housing register applications.
- **Financial Hardship and Housing Affordability**
Rising rents, high house prices, low wages, and changes to the benefits system contribute to families' inability to secure or sustain accommodation.
- **Other Factors**
Other, less frequent reasons include overcrowding, unsuitability of current accommodation (e.g., health/accessibility needs), and the need to move closer to education, employment or support networks.

As of June 2025, there were 4,955 families on the housing registers across the councils' areas which equates to 43% of all applications.

Analysis of trends shows that relationship breakdown, domestic abuse and the loss of private rented tenancies remain the leading immediate triggers for applications, emphasising the importance of early intervention and targeted prevention support.

3.3.6 Survivors of domestic abuse

Domestic Abuse continues to be one of the primary drivers of homelessness across Worcestershire, with a profound and lasting impact on victim/survivors, families, and communities. Since the introduction of the Domestic Abuse Act 2021, LHAs and Worcestershire County Council have worked collaboratively to strengthen housing pathways, deliver on new statutory duties, and create a coordinated, trauma-informed response using a whole family approach for those fleeing abuse.

The establishment of the Worcestershire Domestic Abuse Partnership Board, a domestic abuse and housing coordinator, specialised domestic abuse housing officers and the provision of safe accommodation has led to more consistent standards of support across the county. Housing teams, alongside commissioned domestic abuse providers, now play a critical role in early identification, prevention, and sustaining safe accommodation for survivors.

Data and Trends

Data highlights that domestic abuse remains a significant cause of homelessness presentations across Worcestershire over the last three years. Of those owed a homelessness duty in 2024/25, 30.8% of households presented due to domestic abuse.

	Prevention (%)	Relief (%)	Total (%)
2022/23	8.3%	18.4%	26.7%
2023/24	9.7%	18.8%	28.5%
2024/25	7.1%	23.7%	30.8%

In 2024/25 over 10,000 domestic abuse-related incidents and crimes were recorded by police in Worcestershire. This total includes both crimes and non-crime incidents. According to Worcestershire County Council’s Operation Encompass page, which summarises West Mercia Police’s Q4 2024/25 Performance Monitoring Report, around 25% of all recorded crimes in the county were classified as domestic abuse related.

While West Mercia Police data for the same period indicates a statistical decrease in domestic abuse incidents across the force area, the figures for Worcestershire demonstrate that domestic abuse remains a significant issue locally.

Despite improved reporting, local insight suggests that many survivors still do not disclose abuse, indicating ongoing unmet need. Across the county, domestic abuse-related approaches accounted for a significant proportion of homelessness applications. The majority were women with dependent children, though a growing number of single survivors, male victims, and individuals with complex needs have been identified.

Sanctuary Schemes and Safe Accommodation

LHAs across Worcestershire, work in partnership to deliver safe accommodation, including, refuge spaces, dispersed units, and sanctuary schemes to enable survivors to remain safely in their homes where appropriate.

Sanctuary Scheme Referrals (September 2024 - August 2025):

District	2024/25
Bromsgrove	3
Malvern Hills	15
Redditch	8
Wychavon	32
Wyre Forest	47

Between 2024-2025 a total of 105 referrals were made to sanctuary schemes across all 5 local authorities. Overall referrals have decreased

across most districts, with some localised increases, highlighting variation in demand and referral pathways.

There has been much progress across the LHAs since the implementation of the Domestic Abuse Act 2021 statutory duty across LHAs including the expansion of the Domestic Abuse Community Champions network through Worcester Community Trust and West Mercia Women's Aid, delivery of trauma-informed housing training to frontline staff, specialist Domestic Abuse Housing in each council (who have received positive feedback from service users) and strengthened partnership working between housing, police, and support providers through regular MARAC coordination and attendance at DRIVE meetings.

All the housing teams work in partnership with Sanctuary Schemes to help victim-survivors of domestic abuse stay safely in their homes by providing tailored security measures, reducing the need to move.

The introduction of the Domestic Abuse Housing Coordinator role to work closely with Domestic Abuse Housing Officers has ensured training and knowledge remain up to date.

3.3.7 Veterans

Instances of homelessness amongst veterans are low locally, however there is action to be taken to further tackle this. LHAs are currently working with the Worcestershire Armed Forces Covenant team to ensure that there is a good understanding of the Armed Forces Covenant in housing services and ensure that organisational policies reflect the needs of the Covenant e.g. that local connection rights (for the purposes of social housing allocation) are embedded in policy.

3.3.8 Refugees and migrant homelessness

Worcestershire has provided a sanctuary to refugees from Ukraine, Syria and Afghanistan through the government's resettlement schemes, including Homes for Ukraine, the [Afghan Citizens Resettlement Scheme](#) (ACRS) and [Afghan Relocations and Assistance](#)

[Policy](#) (ARAP), as well as a small number of arrivals through the Community Sponsorship Scheme. Accommodation has been provided by a combination of private hosts, the private rented sector and, where appropriate, social housing.

The Home Office is responsible for providing accommodation for asylum seekers, whilst their asylum claims are being processed. Home Office accommodation is provided in Worcestershire in both contingency hotels and dispersal accommodation (usually self-contained family accommodation or houses of multiple occupation). However, asylum seeker numbers in Worcestershire are currently relatively low in comparison to other areas of the UK.

Once asylum has been granted, a refugee is required to leave their Home Office accommodation, with notice to quit currently at 42 days from the date of decision. A process is in place for information to be shared with the local housing authority of notice to quit local Home Office accommodation, to ensure housing advice can be provided.

Homelessness amongst this cohort is relatively low locally due to fewer asylum seeker numbers than other areas of the country and the fact that those placed in Worcestershire often look to relocate to areas where cultural or religious needs are better met or nearer to family members once asylum has been granted. However, it still remains a challenge to be able to respond to the needs of refugees and migrants. We are seeing an increase in approaches for those with No Recourse To Public Funds, where options for support are extremely limited, and LHAs need to work closely with our partner VCSE organisations to respond to this.

3.3.9 Hospital discharge, substance use and Adult Social Care support

"Discharge from hospital into poor quality, insecure housing or, in the worst cases, onto the streets is a deeply harmful outcome. When combined with unmet mental health needs and substance use needs, it can severely undermine people's recovery and increase the risk that

their health deteriorates further and makes them even more vulnerable.” [A National Plan to End Homelessness, MHCLG, 2025.](#)

The government is committed to a target that no one eligible for assistance is discharged to the street after a hospital stay and will be working with the NHS and councils to implement the [Discharging people at risk of or experiencing homelessness guidance published in 2024.](#)

In preparation for this, our strategy will commit to exploring local opportunities with colleagues across the health system to promote early identification of housing issues and planning from admission both for accommodation needs but also any ongoing health and care needs.

The LHAs do not provide any supported temporary accommodation and therefore it is essential that if people do need to access temporary accommodation that the necessary support and care package is provided to reduce the risk of a harmful outcome.

Safely, district councils have seen a rise in the number of homeless people harming themselves, and others, in temporary accommodation and an increase in the number of deaths in temporary accommodation through people dying by suicide or overdose. Although the numbers are small, they are increasing and this desperately needs to be addressed to safeguard people and prevent this from happening.

At the time of writing this strategy a roundtable event was being organised to bring together senior officers from housing, health, social care, registered housing providers, and safeguarding to focus on the issue of supporting people with complex needs in unsupported accommodation. It is expected that the recommendations from that event will feed into this strategy and the action plan.

3.3.10 Neurodivergence and homelessness

People with a range of neurodivergent needs, including autism, ADHD, dyslexia, dyspraxia, learning disabilities and other cognitive differences, may face additional barriers and challenges when navigating housing services or experiencing homelessness. These barriers often relate to communication differences, difficulties with unfamiliar and changing environments, sensory needs, and the cumulative impact of unmet support needs.

To better support local residents with neurodiverse needs, Local Housing Authorities have introduced training for housing officers to improve understanding of neurodivergence and to help staff recognise when individuals may require tailored approaches, including those who do not have a formal diagnosis. This training aims to ensure that interactions are accessible, supportive, and responsive to individual needs rather than relying on assumptions or labels.

LHAs are also reporting increasing numbers of households requesting additional bedrooms where, for example, children with neurodivergent needs are unable to share bedrooms with siblings. This often reflects genuine challenges relating to sleep, safety, behaviour regulation, or sensory differences. These pressures contribute to growing demand for larger family homes within an already limited social housing stock.

4 Pillar 3: Preventing crisis – helping people stay in their homes

Identifying and preventing homelessness at the earliest possible stage is the best outcome for households, LHAs and the public purse. However, where it has not been possible to prevent homelessness, services need to work together quickly and effectively to ensure that it is as brief as possible.

4.1 Preventing homelessness at the earliest stage

‘Too often, households are known to one service, such as a voluntary or community organisation, without that information being shared with the council or other relevant partners. To deliver truly coordinated and preventative support, everyone must work together, with clear referral pathways and shared responsibility for identifying and responding to risk early.’

[A National Plan to End Homelessness, MHCLG, 2025](#)

Locally as well as nationally, we want to increase the proportion of households who are supported to stay in their own homes or helped to find alternative accommodation - to prevent homelessness and the need for temporary accommodation.

Details of the Government’s new Homelessness, Rough Sleeping and Domestic Abuse Grant were announced in December 2025 as part of a provisional multi-year settlement. The intent of this grant is to simplify homelessness funding and allow for greater flexibility in spend according to local need.

The provisional 3-year allocations will allow for longer term strategic planning to commission or directly provide homelessness services/initiatives on a longer-term basis, rather than annual allocations in recent years.

To inform this strategy, a mapping exercise was carried out as part of the homelessness review which identified what services are available across Worcestershire and what gaps in provision there might be. A summary of this is contained within the homelessness review and an action within the plan is to explore what services are required to be commissioned or directly provided by LHAs based on the findings of the review.

The LHAs already provide a number of services to help prevent homelessness or to ensure suitable alternative accommodation is available at the prevention stage. This includes access to funding for rent deposits/bonds and rent in advance, welfare assistance, working with landlords and families to resolve issues and mediation for young people and their families.

4.2 Accessing the right support at the right time

It is vital that people get the support that they need, when they need it, to prevent homelessness. Housing and homelessness systems can be complex by the very nature of legislation, geographical location, differences in funding and associated criteria, whether they are provided by statutory or voluntary services and as such it can be challenging for people to navigate them or understand what support is available.

The need to raise awareness of what services are already available was a key theme arising from partners who attended the strategy stakeholder event held in September 2025. The mapping exercise outlined in the previous section will be useful in raising awareness but the LHAs are keen to work with partners to build further on this through improved communication and joint training across organisations and sectors. Joint work with the Adult Front Door and the Community Directory are actions within the strategy action plan.

To proactively identify and predict where households may be at risk of homelessness, we want to improve our use of data to enable us to target high-risk households 3-6 months before they potentially reach crisis point. To address this, we want to explore using a predictive analytics model utilising a range of different data to target our homelessness prevention work.

4.3 Person-centred support to prevent rough sleeping

The councils have worked closely together for many years to tackle rough sleeping and have developed a range of initiatives such as No First Night Out (emergency bed spaces for those that are new to the street), Housing First/Led models (intensive support linked to accommodation), outreach support, bespoke funding and person-centred packages of support. A Rough Sleeper Coordinator has also been in post for several years to oversee the councils' strategic approach to tackling rough sleeping and unblock barriers to accommodation for those with a poor tenancy or offending history.

We will aim continue providing bespoke funding for outreach teams and the Rough Sleeper Coordinator to find a housing solution for those at risk of rough sleeping and rough sleepers.

5. Pillar 4: Improving emergency responses – improving temporary accommodation and making people’s experiences better if they do become homeless

Whilst the aim is to prevent homelessness at the earliest possible stage and negate the need for temporary accommodation, it will always be needed as a safety net for households at crisis point.

LHAs have a duty to provide temporary accommodation in certain circumstances to homeless households. They can also utilise a discretionary duty to accommodate others, where no duty is owed but they are accommodated under wider policy initiatives such as No First Night Out/No Second Night Out to prevent rough sleeping or to support rough sleepers coming off the streets.

If temporary accommodation is required then it must be safe, affordable, of a decent standard and stable. B&B accommodation is not suitable for families with children, but we recognise that it may be the only option at crisis point.

Over the previous three years the number of placements ending has steadily declined from 1121 to 734 and the same for placements with children 339 to 235. Which means that households are spending longer in temporary accommodation. This is due to increasing pressure on housing availability impacting on the ability to house people into permanent accommodation. Correspondingly in the five districts the length of stay in temporary accommodation over 12 weeks has risen from 18% in 2022/23 to 26% in 2024/25 and a corresponding increase of length of placements for the longer timescales (or static numbers over the last three years).

For all the councils the most used type of temporary accommodation is Bed and Breakfast but the amount this is used varies from 46% of all

placements in Redditch to 59% in Wyre Forest in 2024/25. There has been a decrease in use of Bed and Breakfast between 2023/24 and 2024/25 in all of the councils except Bromsgrove where the percentage of placements in B&B have increased from 42% to 48%.

This shows positive work undertaken by many councils to bring other forms of temporary accommodation into use including from Registered Providers and councils’ own stock. When considering the use of temporary accommodation for households with dependent children, WFDC and MHDC still mainly use Bed and Breakfast (53% and 72% respectively). However, both WDC and BDC use more temporary accommodation provided by Registered Providers than B&B (39% and 56% respectively) and RBC mainly use their own housing stock (61%).

The availability of different types and numbers of temporary accommodation differs across the county and can range from ad hoc used of emergency accommodation such as Bed and Breakfast to accommodation owned and managed by the Councils directly. See the table below for more information on temporary accommodation across the districts.

Placements into:	22/23	23/24	24/25
TA within RP Stock	89	89	72
TA within your own stock	113	115	98
Any other type of TA	27	28	76
Made own arrangements for TA	36	13	3
Other nightly paid, privately managed accommodation	165	92	69
Private sector TA leased council / Registered Provider	29	43	12
Bed & Breakfast	633	578	395
Temporarily remains in property	5	3	3
Other: e.g refuge	24	13	6

The new government strategy has a strong focus on households in temporary accommodation and particularly those with dependent children. There is now a body of research around the health impacts of temporary accommodation on people’s health including infant mortality and councils are expected to reduce the use of Bed and Breakfast style accommodation for families over the lifetime of this parliament.

All the LHAs have support workers who can provide additional support to households in need, but the resource is limited and it is critical that the councils utilise other support and care providers where relevant.

LHAs want to increase the amount of good quality self-contained accommodation, which will provide a better experience for homeless households but is also better value for money and less expensive than nightly paid accommodation.

We will work with education providers and GPs to ensure they are aware and can support those households in Temporary Accommodation where appropriate.

6. Pillar 5: Recovery and preventing repeat homelessness – ensuring people don't experience homelessness more than once and halving long term rough sleeping

With the right support people can rebuild their lives after experiencing the trauma of homelessness and break the cycle of repeat homelessness.

6.1 Ensuring people don't experience homelessness more than once

Preventing repeat homelessness is achieved through a variety of ways depending in part on the client group. Ensuring households are supported through the transition from temporary into permanent accommodation and working with households to make them tenancy ready whilst in temporary and supported accommodation has proved beneficial.

Some repeat homeless can arise through households not being able to access health interventions when needed. Locally some LHAs have funded Mental Health Link workers to work with housing teams and households approaching for homelessness assistance. This has proved a valuable resource to enable homeless households to access mental health support and assisting them to access existing mental health services at the right time.

Through regular meetings, agencies collaborate on policy development, share data and good practice, and coordinate funding opportunities. This joined-up approach strengthens the county's ability to deliver sustainable solutions and improve outcomes for those at risk of, or experiencing, homelessness.

Further work needs to be done to better understand why repeat homelessness for survivors of domestic abuse and larger families with complex needs is high and we will work with those with lived experience to see if we can develop workstreams to tackle this.

6.2 Tackling long term rough sleeping

The Government's funding programmes have enabled LHAs to implement a number of service offers for rough sleepers including Housing First/Led, No First/Second Night Out, outreach workers and access to personalised budgets. This approach has supported the most entrenched rough sleepers, some of whom had previously been on the streets for many years, to maintain social housing/private rented tenancies. Through the use of personalised budgets for meaningful activities and engagement opportunities councils have been able to help rough sleepers and former rough sleepers to sustain their accommodation, make their property a home, build positive routines and strengthen community connections.

By offering bespoke interventions, the personalisation budget helps to break the cycle of homelessness and reduce the likelihood of individuals returning to the streets. It empowers frontline staff to respond quickly and creatively to barriers faced by rough sleepers, ensuring that support is not only practical but also person-centred.

This strategy is committed to maintaining this robust approach to tackling and reducing rough sleeping.

6.3 Access to specialist health services: mental health, physical health & substance use

"What needs to be considered is the traumatic experience of being homeless. And that doesn't stop the moment you come out of homelessness... Even if you didn't have mental health issues going into homelessness, you are guaranteed 100 million percent [to have mental health issues after experiencing homelessness]. I have no doubt in my mind at all that everybody goes through a homelessness journey will experience trauma if being homeless and that needs to be considered because even if you've got no recovery to deal with, no official mental health diagnosis or

any compound need, you are going to have an adjustment and, you know, adjustment from that trauma”

MHCLG (2025) Lived Experience Forum Report, recommendations from people with lived experience for the cross-Government homelessness strategy, Revolving Doors, Groundswell, Justlife Foundation

Project Bright Path supports people who are rough sleeping or at risk of rough sleeping and experiencing mental health challenges, both diagnosed and undiagnosed. The programme provides rapid, relational and trauma-informed support through short-term, focused interventions and better connection into mainstream services. Its purpose is to help people stabilise at times of crisis and access the right mental health and housing support at the right time. A key development during the year was the appointment of two Band 7 mental health practitioners, one based in Herefordshire and one in Worcestershire. Their specialist clinical input has already made a difference, supporting people with complex needs, helping unlock access to formal mental health assessments and diagnosis, and strengthening the ability of frontline workers to navigate mental health systems.

The project also delivers a training programme which is delivered in partnership with a wide range of organisations, including LHAs, housing providers, rehabilitation centres and voluntary sector partners. Content has continued to evolve, with additions including trauma-informed approaches, neurodiversity awareness and clearer pathways for mental health and homelessness support.

In developing this strategy, housing and health colleagues have been engaging in more detailed discussions around the links between mental health, physical health and homelessness and what could be done locally to address poor health and inequalities via the countywide Homelessness and Rough Sleeping Strategy group, the Worcestershire Housing Board, the Housing and Health Group, the district health collaboratives, and the Health Inequalities Prevention Personalisation Care Board. This strategy is committed to ensuring access to specialist services for homeless

households and specific actions will be defined in conjunction with housing and health.

6.4 Community support and services

The LHAs recognise that peer support can be invaluable in tackling and preventing homelessness. Those that have lived experience will often be able to engage complex homeless households more effectively as they know first hand what it is like to experience homelessness and disadvantage.

Homelessness peer support models are in place in some areas of the county and there remains a commitment from the previous strategy to review peer support models and identify good practice with a view to potentially increasing or upscaling peer support.

The Homelessness and Rough Sleeper Strategy Group continues to learn from those with lived experience of homelessness through ongoing feedback, workshops and questionnaires.

The service mapping exercise carried out as part of the Homelessness Review and the [Community Services Directory](#) are also useful to highlight the community support services available. Ongoing discussions on how to harness community support continue to take place at local homelessness forums.

We will continue to engage with other services that can support households into education, employment and training and those that assist people with managing finances such as the Citizens Advice Bureau.

7. Governance arrangements

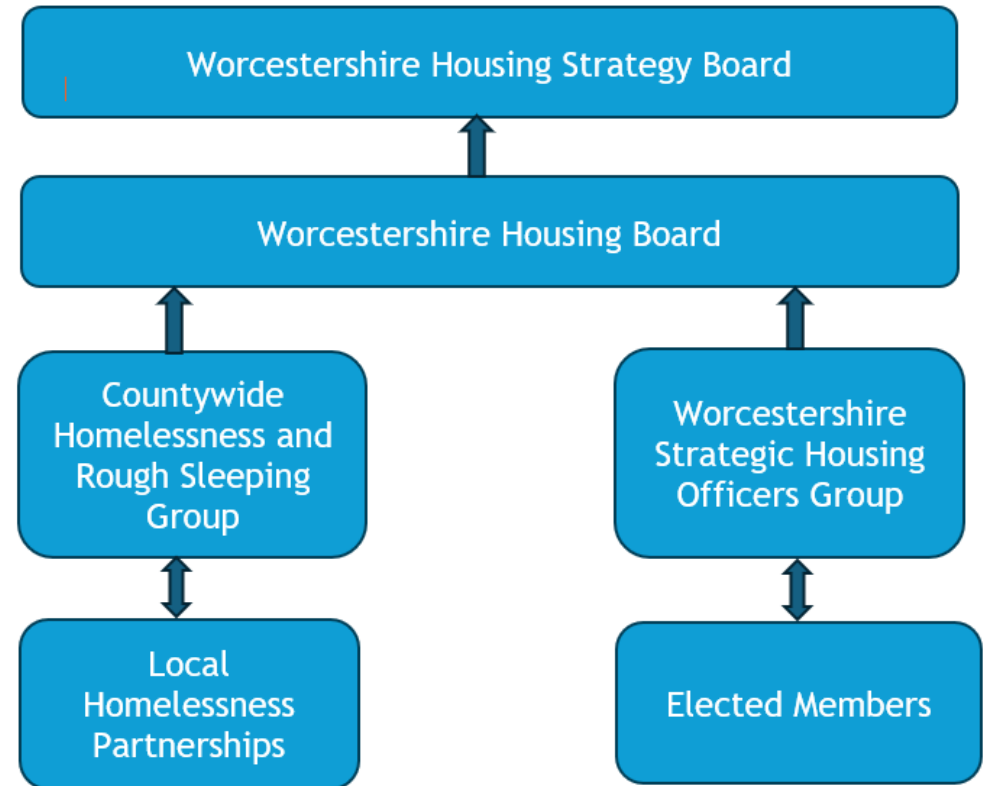
7.1 Oversight, delivery and monitoring

Worcestershire Housing Board is responsible for ensuring that the commitments within the Homelessness and Rough Sleeping Strategy are realised. The partnership is a multi-agency and cross-sector partnership, ensuring delivery of the strategy is supported across relevant organisations. The Housing Board reports to the Housing Strategy Board comprised of Chief Executive or senior officers from LHAs, Registered Providers, NHS and Public Health.

The Strategy will be overseen by the Countywide Homelessness and Rough Sleeping Group, a public and voluntary sector partnership that brings together statutory agencies, housing teams, health services, and community partners to ensure a coordinated response to homelessness across the county. The chair of that group will attend the Housing Board regularly to report on outcomes achieved and progress against actions.

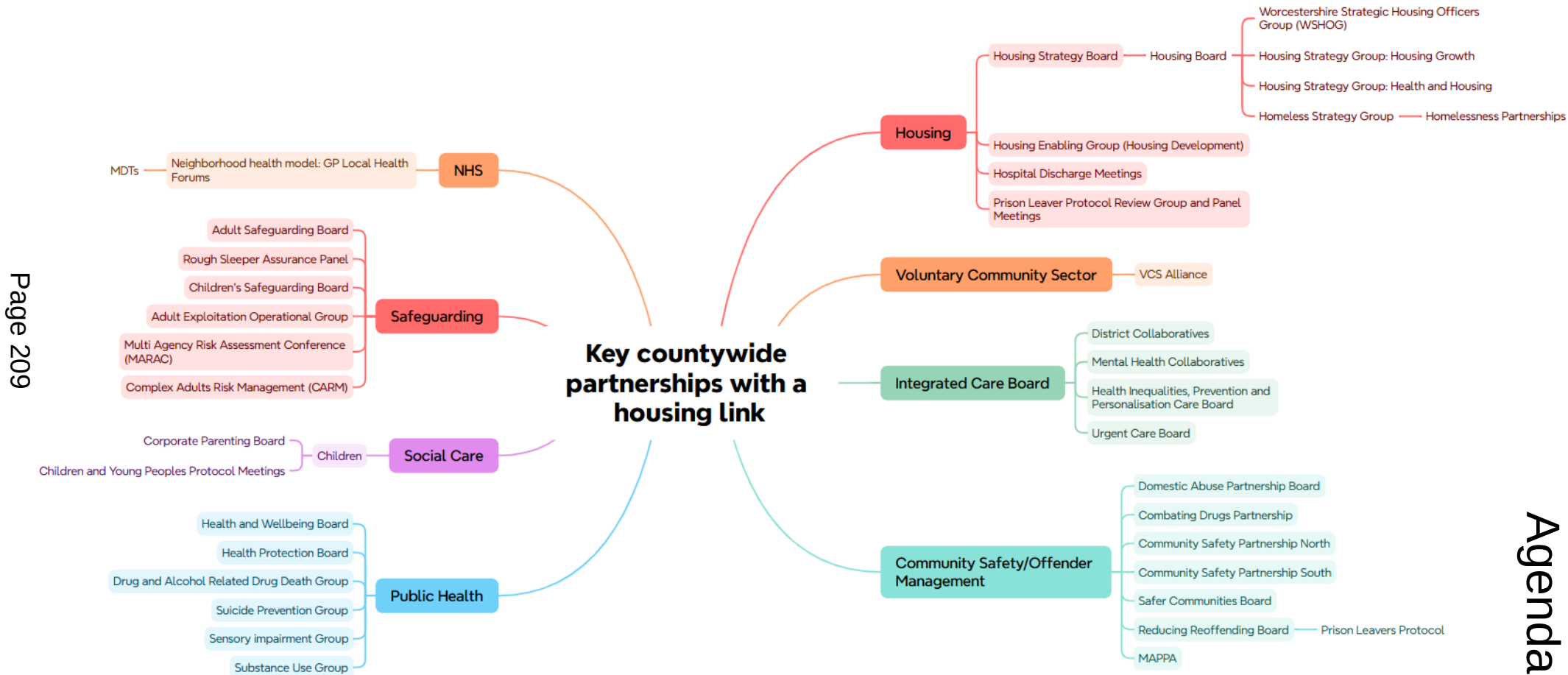
Each LHA has its own local homelessness partnership, consisting of local statutory and voluntary partners which will oversee and deliver on homelessness services and the strategy at a local level and feed into the Countywide Homelessness and Rough Sleeping Group.

The LHAs are responsible for meeting their own statutory duties in relation to preventing homelessness. The Worcestershire Strategic Housing Officers Group (WSHOG) will be responsible for the operational delivery of the LHA elements of the strategy. Each LHA will have their own separate mechanism for reporting back to elected members on outcomes and progress including committees and member briefings to ensure there is political oversight on the delivery of the strategy and services.



8. Partnerships

Partnerships are essential to the delivery of the strategy as many organisations have a role to play in tackling homelessness and rough sleeping in the wider context.



This is not a definitive or exhaustive list of all partnerships but highlights some key groups and inter-relationships. There are also localised partnership and strategic groups within each LHA that are not included in this section.

The advent of the Integrated Care Boards and review of the role of the Health and Wellbeing Board has led to a new way of working within the health, social care and wider partnerships including greater district level working with Primary Care Networks.

Integrated Care System - Taking collective action to tackle health inequalities.



Reducing Re-offending Group & MAPPA Strategic Management Board

The Reducing Re-offending Board oversees the development and delivery of the criminal justice pathway and protocol across the county, following on from work commissioned by Public Health and the LHAs. Multi-Agency Public Protection Arrangements (MAPPA) were introduced in 2001 under the Criminal Justice and Court Services Act 2000 and subsequently strengthened by the Criminal Justice Act 2003 as the statutory arrangement for managing sexual and violent offenders. It provides a mechanism whereby the agencies involved can better discharge their responsibilities and protect the public in a coordinated way. The responsible authority for MAPPA in each criminal justice area consists of the police, probation, and prisons. LHAs have a duty to cooperate with MAPPA arrangements in assessing and managing the risks posed by MAPPA-eligible offenders and the Board oversees the process.

Adult Safeguarding Board and the Assurance Panel

The main purpose of Worcestershire Safeguarding Adults Board (WSAB) is to promote wellbeing and reduce the risk of harm for people with care and support needs. Rough sleepers specifically are overseen by an Assurance Panel. The LHAs are represented on the Board and Panel at Senior Officer level.

Corporate Parenting Board (CPB)

The CPB provides leadership and a governance structure for corporate parenting to drive forward the outcomes for looked after children and care leavers. It oversees the Board's strategy and promotes the voice of

children and young people. It also provides challenge and scrutiny to ensure the best outcomes are achieved for children in care and care leavers. LHAs are represented at CPB by officers from WSHOG.

Domestic Abuse Partnership Board (DAPB)

The DAPB consists of key partners with an interest in tackling domestic abuse and supporting victims, including their children. The DAPB has been created to support Worcestershire County Council in meeting its duty under Part IV of the Domestic Abuse Act 2021 and to expand upon the wider community-focused work of the Worcestershire Forum against Domestic Abuse.

Agenda Item 15a

Appendix 2 - Funding the strategy

Homelessness Rough Sleeping and Domestic Abuse Grant, & New Burdens Funding for Renters Rights Act

Our targets are based on national targets to create a step change in our approach to work upstream and prevent homelessness wherever possible. These are to:

- increase the proportion of people who are supported to stay in their own home or helped to find alternative accommodation when they approach their local council for support
- eliminate the use of B&B accommodation for families, other than very short-term use in emergencies
- halve the number of people sleeping rough long-term

Total Three Year Funding Allocation 2026-2029

Local Authority	Homelessness Rough Sleeping and Domestic Abuse Grant	Of Which, funding for Homelessness and Rough Sleeping	Funding for Renters Rights Act 2025 New Burdens	Funding for Domestic Abuse Safe Accommodation Grant
Bromsgrove	£ 1,636,130.00	£ 1,474,318.00	£ 50,497.00	£ 111,315.00
Malvern Hills	£ 1,414,759.00	£ 1,310,533.00	£ 42,799.00	£ 104,226.00
Redditch	£ 2,477,421.00	£ 2,294,301.00	£ 72,088.00	£ 111,032.00
Wychavon	£ 2,627,008.00	£ 2,552,442.00	£ 76,082.00	£ 104,565.00
Wyre Forest	£ 2,485,740.00	£ 2,307,923.00	£ 70,660.00	£ 107,157.00
Total	£ 10,641,058.00	£ 9,939,517.00	£ 312,126.00	£ 538,295.00

The Local Authorities will utilise the funding strategically to meet deliver on our targets and respond to local need. We will measure the outcomes below with a view to improving performance year on year.

- number of households with children in temporary accommodation
- number of families in B&B over 6 weeks
- percentage of duties owed where homelessness was prevented or relieved
- percentage of duties owed where homelessness was prevented or relieved for those with 3 or more support needs
- number of people sleeping rough on a single night
- number of people sleeping rough over the month who are long-term

We will ensure that we have a policy in place for ensuring suitability of temporary accommodation, following an assessment, including procuring sufficient units of temporary accommodation and allocating them.

Domestic Abuse Act Funding for Domestic Abuse Housing Officers 2025/6

Housing Authority	Grant (£)
Bromsgrove District Council	33,666
Malvern Hills District Council	33,666
Redditch Borough Council	33,666
Wychavon District Council	33,666
Wyre Forest District Council	33,666

Funding for domestic abuse services is essential to ensure the provision of dedicated, specialist officers who can effectively respond to victims and survivors. These officers play a critical role in early intervention, risk assessment, safeguarding, and multi-agency coordination. Sustained investment will allow for improved response times, consistent victim support, enhanced offender management, and better outcomes for families affected by domestic abuse. Funding will support recruitment, specialist training, and retention of officers, ensuring victims receive trauma-informed, timely, and effective protection while reducing repeat incidents and long-term harm within communities.

Household Support Fund (2025/26)

HSF 7 Allocation April 25 - March 26

District Council 12 month allocation	General allocation	Food/warm space allocation	Total
Bromsgrove	£171,321.39	£18,000.00	£189,321.39
Malvern Hills	£235,312.23	£18,000.00	£253,312.23
Redditch	£329,900.14	£18,000.00	£347,900.14
Wychavon	£230,918.03	£18,000.00	£248,918.03
Wyre Forest	£328,625.52	£18,000.00	£346,625.52
Total	£1,296,077	£90,000.00	£1,386,077

The Household Support Fund (HSF) is intended to provide targeted financial assistance to vulnerable households who are struggling to meet the cost of essential living expenses. The fund aims to prevent crisis, reduce hardship, and support households to maintain stability.

Discretionary Housing Payments (2025/6)

Housing Authority	Grant (£)
Bromsgrove District Council	62,332
Malvern Hills District Council	75,651
Redditch Borough Council	79,296
Wychavon District Council	112,099
Wyre Forest District Council	110,242
Total	439,620

Discretionary Housing Payments (DHPs) provide short-term financial assistance to households who require additional help with housing costs and are in receipt of Housing Benefit or the housing element of Universal Credit. The fund aims to prevent homelessness, sustain tenancies, and support households during periods of financial difficulty.

Appendix 3 - Glossary of terms

CAS3 : Community Accommodation Service	11
DAPB: Domestic Abuse Partnership Board	24
DRIVE: A domestic abuse partnership that protects victims by disrupting, challenging and changing the behaviour of those who are causing harm.....	14
LGR: Local Government Reorganisation	2
LHAs: Local Housing Authorities	4
MHCLG: Ministry of Housing Communities and Local Government.....	9
MARAC: Multi agency risk assessment conference.....	14
PWLE: People with Lived Experiencee	4
RP: Registered Housing Providers	6
TPG: Target Priority Group (most complex rough sleepers).....	4
WSHOG: Worcestershire Strategic Housing Officers Group.....	26

Appendix 1 – Action Plan

The Action Plan below sets out the actions that specifically relate to preventing and relieving homelessness, however, in recognition of the Government’s commitment to build 1.5 million homes backed by £39 billion investment, and consistent with the national homelessness strategy and wider housing policy, the local authorities recognise that local prevention efforts must be supported by sufficient affordable housing and effective allocation of social stock. Without this, demand for crisis interventions and temporary accommodation will continue to rise. The councils will ensure alignment with the Worcestershire Housing Strategy in order to support the increase in the supply of new affordable and high-quality homes and to address the need for greater diversity in the housing stock through the development of the supported housing strategy. Performance against delivery of new build housing is monitored through the Worcestershire Housing Board.

Pillar 1: Universal Prevention - tackling the root causes of homelessness

Action	Measure	Target	Lead	Timescale
1.1 Prevent homelessness from private rented sector tenancies by building relations with landlords to identify those at risk of homelessness at an earlier stage, utilising funding where appropriate and available and take action to sustain tenancies.	Homelessness arising from the ending of private rented sector tenancies are reduced through measures including; - Landlord forum and prevention panel established. - “Help to Stay” scheme established in areas without one. - Tenancy Sustainment Officers in place (funding dependent). - Utilise funding such as the Crisis Resilience Fund and homeless funding to sustain tenancies	- Collect the number of evictions for rent arrears in 2026/27 to establish the baseline in year one - Increase the number of cases taken to prevention panels/Housing Advice teams for rent arrears from Landlords by 20% in year 2	- Housing Advice Team Leaders - Housing Strategy Officers - Private Sector Housing Teams	Year 1 / 2
1.2 Ensure more legal support is available for tenants facing eviction by expanding partnerships with organisations who already undertake this work so that services have sufficient resource, knowledge, expertise and capacity to robustly defend evictions based on grounds under Renters Rights Act.	The teams are able to advise and refer households for support around the Renters Rights Act; - Training on Renters’ Rights Act undertaken for LHA staff. - Established referral mechanisms are in place with the Housing Loss Prevention Advice Service	- Collect the number of evictions for rent arrears in 2026/27 to establish the baseline in year one - Increase the number of cases taken to prevention panels/Housing Advice teams for rent arrears from Landlords by 20% in year 2 - 5% increase in tenancies sustained for twelve months in the private rented sector following intervention.	- Housing Advice Team Leaders - Housing Strategy Officers - Private Sector Housing Teams	Year 1 / 2
1.3 Develop an integrated tenancy sustainment approach , bringing together housing, community organisations/hubs, employment and financial	- “Tenancy at Risk” protocol with Registered Providers is explored.	- Collect the number of evictions for rent arrears	- Housing Advice Team Leaders/Housing Strategy Officers	Year 2

inclusion partners and develop stronger links to online support, to identify tenancies at risk and deliver coordinated support.	- Coordinated support packages in place including income maximisation, debt advice, financial literacy training, and flexible crisis prevention/ discretionary welfare funding.	in 2026/27 to establish the baseline in year one. - Increase the number of cases taken to prevention panels/Housing Advice teams for rent arrears from Landlords by 20% in year 2	- Community Services	
1.4 Review the Duty to Refer data and prepare for the new Duty to Collaborate to ensure that any potential homeless cases are referred to the local housing teams by partner agencies at the earliest opportunity.	Referrals from mandatory duty to refer organisations is increased where there is a low number currently.	- 10% increase in the number of Duty to Refer referrals from organisations with low referral levels. - 10% increase in the proportion of cases approaching for homelessness assistance at prevention stage/ earlier from wider partner agencies included in the Duty to Collaborate.	- Housing Strategy Officers/All statutory agencies required to refer	Year 2 Year 3
1.5 Use data and lived experience to track and evaluate progress against the strategy (and inform service delivery) using key performance indicators and regular reviews. Consider how we can implement “big picture” reporting to demonstrate and understand homelessness prevention activity across all sectors/organisations.	Improved opportunities for learning from data and those with lived experience and People With Lived Experience (PWLE) attending/providing feedback to the Homelessness Strategy Group.	- Summary reporting mechanism developed to show homelessness prevention work across all sectors/organisations. - Data dashboard and baseline statistics developed and monitored at countywide homelessness strategy meetings. - Minimum of 2 lived experience sessions held a year.	- Research and Intelligence Officer - Housing Strategy Officers	Year 2
1.6 Improve shared understanding of the work of all partner agencies in preventing homelessness through promoting the Community Services Directory, and joint training and awareness sessions.	Customers are able to access information and know where to go if they are in housing difficulties. All homelessness prevention services are	- Promote the CSD at min of one homelessness forum in each district, explore what services are	- County Council, - Housing Advice Team Leaders/Housing Strategy Officers	Year 2

	signed up to the community services directory	available and allow for the identification of any gaps in services. - Districts organise one joint training session per annum with the VCSE and/or stat orgs for increased awareness of roles and responsibilities	- Homelessness Partnerships	
1.7 Develop and implement clear referral guidance and processes between agencies (housing, health, education, social care) for early identification of at-risk individuals.	Referral guidance and process defined and promoted and this supports a reduction in the number of individuals are released from institutions into homelessness.	- 10% increase in the number of Duty to Refer referrals from health and social care settings. - 10% reduction in homelessness from institutions	Housing Strategy Officers, Health, Education and Social Care Leads	Year 3 Year 4
1.8 Explore opportunities to develop and deliver homelessness education programmes in schools	To improve the level of understanding of young people around homelessness and how to prevent it.	Service offered by Nightstop in WF are reviewed and roll out across other district (funding dependent)	Housing Strategy Officers	Year 3
1.9 Make better use of existing social housing by exploring opportunities to better match disabled households with adapted housing and by tackling under occupation of larger properties	The councils make best use of existing stock including fully utilising adapted housing	- Current adapted stock within RP provision is mapped - Identify current levels of demand for adapted homes - Consider how the stock is identified and prioritised for those who need those adaptations following best practice	Housing Strategy Officers	Year 2

Pillar 2: Targeted Prevention - targeted support for people at risk of homelessness

Action	Measure	Target	Lead	Timescale
2.1 Explore the feasibility of a predictive homelessness risk model that pulls data from a range of sources to identify and target support to people at greatest risk of becoming homeless before they reach crisis point.	Developing a business case for funding to develop a predictive homelessness risk model to increase homeless preventions and decrease the number of temporary accommodation placements required.	1. Stakeholder mapping with a multi-disciplinary steering group including adult social care 2. Completion of a Data protection impact assessment (DPIA)	Research and Intelligence Officer	Year 3

		3. Data inventory and matching across partners 4. Business case for delivery if there is a feasible solution.		
Rough sleepers and single homeless households:				
2.2 Review and strengthen the rough sleeper support/accommodation options (All services and interventions that tackle rough sleeping) and commission or directly deliver services required utilising the new multi-year homelessness funding arrangements. Ensuring safety, accessibility and positive move on options.	A fully implemented, trauma informed rough sleeping pathway that increases successful tenancies and ensures rough sleeping is not recurring.	- Complete a cross sector review of all current provision, - Carry out a needs assessment and develop a Supported Housing Strategy - Re-allocate funding or remodel services based on findings	- WSHOG - Housing Advice/strategy Teams, - Outreach Services, - Rough Sleeper Co-Ordinator	Year 2
2.3 Investigate the ability to provide bespoke funding for RS and single homeless Outreach teams and the Rough Sleeper Coordinator to develop tailored solutions for individuals who have previously been unable to secure or maintain accommodation, subject to funding.	- Reduction in rough sleeping through the use of interventions and meaningful activities. - Overcome the barriers into housing so more Rough Sleepers are accommodated through building relationships with Registered Providers	- Number of individuals housed through the funding - Tenancy sustainment 6 months + - Number of individuals supported through the funding to address unmet needs - Reduction in repeat rough sleeping of 10%	- Rough Sleeper Co-ordinator - Outreach Services - Housing Advice/Strategy Teams	Year 2 (pending funds)
2.4 Expand the online multi-agency work on Target Priority Group rough sleepers Implement outreach and support services TPG online group across all districts to improve cross-boundary coordination and case management. Learning from good practice and promoting joined up working.	Cross-boundary cases are successfully resolved through online multi-agency TPG group working effectively across boundaries+.	- Reduction in the number of TPG rough sleepers. - Increase in TPG rough sleepers accessing services and accommodation - All districts consistently using the TPG platform	- Rough Sleeper Co-Ordinator/Housing Advice Teams	Year 1
2.5 Extend the Mental Health & Homelessness Group to all districts to enable discussion/referrals into mental health services for those at risk of or experiencing rough sleeping	Mental Health and Homelessness group expanded across all districts to ensure consistent access to mental health services and a joined up approach in those with mental health issues facing homelessness which leads to an increase	- Districts holding a minimum of 2 Mental Health and Homelessness groups per annum in each area.	- Housing Advice/Strategy Team Leaders - Rough Sleeper Co-Ordinator	Year 1

	in access to mental health support for rough sleepers			
2.6 Understand factors leading to returns to rough sleeping Using data to identify repeat patterns, implement targeted interventions, and redesign support offers, subject to funding.	Have an enhanced support offer in place for those who return to rough sleeping including through tenancy sustainment to enable them to access housing.	- Reduction in repeat rough sleeping of 10% - Number of individuals receiving enhanced support - Reduction in number of people refused social housing due to poor tenancy history with Registered Providers (baseline established in Year One)	- Rough Sleeper Co-Ordinator - Outreach Services - Housing Advice/Housing Strategy Teams	Year 2
2.7 Set up a Lived Experience involvement process to ensure people who have experienced rough sleeping or homelessness are able to put forward ideas or feedback. Use this feedback to make changes to services and improve everyday practice, subject to funding.	People with lived experience are involved in service development and improvement with their feedback collected and recorded.	- Number of people with lived experience taking part (in a way that meets their needs) - Minimum of 1 RS lived experience session held a year.	- Rough Sleeper Co-Ordinator - Outreach Services - Research and Intelligence Officer	Year 1
Children, young people and care leavers:				
2.8 Support the pilot(s) of the “Upstream” model in partnership with schools, specialist youth and family support services e.g. Centrepoin model (should funding be available). This would include a review of family intervention and mediation services. Initial pilot to commence in Wyre Forest and Bromsgrove.	The causes of youth homelessness and what interventions can be made to sustain accommodation and positive relationships with family/friends are better understood and prevention initiatives developed across the Councils leading to a reduction in youth homelessness.	- Number of secondary schools actively participating. - Percentage of identified ‘at risk’ students successfully engaging with family mediation or respite services to maintain stable housing.	- Housing Advice/Strategy Team Leaders - WF & SW Nightstop - The Basement Project - Children’s Services - Youth Services - Schools	Year 2
2.9 Review the Care Leavers Protocol in light of new legislative requirements that state that care leavers will no longer be deemed intentionally homeless in the case of accommodation breakdown.	Care leavers protocol updated to ensure positive pathways into accommodation avoiding a homelessness route through a bespoke approach to meeting their needs which will include options to stay put and access to higher education	5% reduction in number of Care Leavers being accepted under the homeless duty.	- Housing Advice/Strategy Team Leaders - Children’s Services	Year 1
2.10 Agree a Memorandum of Understanding/Protocol with providers of young persons supported accommodation to facilitate movements to alternative supported accommodation	Memorandum of Understanding/Protocol in place across providers to respond to potential homelessness situations where the relationship with and between	- Number of positive moves or sustained accommodation as a	- Housing Advice/Strategy Team Leaders	Year 3

2.16 Explore opportunities to provide a flexible approach to medical appointments with GPs to meet the needs of those with complex needs/chaotic lives and ensure follow up care is provided- example of health care worker in local day centres.	All rough sleepers have access to a GP and substance use services where appropriate.	Adopt a formalised, flexible healthcare access protocol that reduces missed appointments and ensures continuity of treatment. Ensure housing officers check with all Households entering temporary accommodation that they are registered with a GP	-WSHOG -Integrated Care Board -NHS - Housing Advice Team Leaders	Year 1
2.17 Enhance the collaborative approach with partners to effectively manage the risk to those with complex and multiple needs in temporary accommodation.	Greater understanding of service user needs and risks and management of these in collaboration with other agencies to reduce the number of serious incidents in unsupported TA/housing. Existing support and ongoing care and support processes are reviewed.	- 100% of residents with complex needs in temporary accommodation are identified and risk assessments completed - A co-produced multi agency safety plan in place within five working days of placement.	- Worcestershire Housing Board - WSHOG	Year 2
2.18 Integrate mental health services more deeply into homelessness prevention and intervention strategies. E.g. outreach teams should have improved access to mental health professionals to provide immediate support to those in crisis, and ongoing support is provided for those in unsupported temporary accommodation.	Improved access to mental health services for those in Temporary Accommodation through the mapping of current mental health services (and their capacity) with, gaps identified. If gap identified secure funding to meet needs.	- Develop dual diagnosis outreach screening tool - Number of joint casework reviews undertaken for high risk individuals	- Housing Advice / Outreach Teams - Mental Health Services	Year 3
2.19 Develop more fully accessible permanent and temporary housing through Disabled Facilities Grant, Health funding and Homes England Funding (dependent on funding)	An increase in healthy and accessible new build and temporary housing to meet needs.	- % increase in number of accessible temporary accommodation units from Year one baseline. - Number of new build social rent properties meeting M4(3) accessibility standard	-WSHOG -Worcestershire Housing Adaptations Service - Planning	Year 4
2.20 Investigate the ability to provide flexible budgets to prevent homelessness families and single people facing severe mental health issues.	Increase in homelessness prevention for this cohort to inform future service delivery.	Feasibility report, data collection on what works and pilot evaluation carried out which establishes a framework for	-Housing Advice Team Leaders/Housing Strategy Teams	Year 4

		funding.		
Domestic abuse				
2.21 Sustain and expand safe accommodation options (funding dependent) to eliminate the use of inappropriate B&B for DA survivors.	The use of inappropriate B&B is eliminated for DA victims/survivors	- % increase in the number of safe accommodation options. - % reduction in B&B use for DA survivors.	-DA Coordinator -Public Health -Housing Providers	Year 2
2.22 Review best practice in preventing homelessness due to domestic abuse at an earlier stage through early interventions with households at risk of homelessness due to DA.	Those are risk of homelessness and experiencing domestic abuse approach for homelessness assistance at an earlier stage e.g. prevention stage, not relief/crisis stage and are able to take up preventative options including the Sanctuary Scheme.	- % Decrease in homelessness approaches due to DA - % Increase in the use of Sanctuary Scheme.	- DA Coordinator - DA Housing Officers - Research and Intelligence Officer	Year 1
2.23 Develop a protocol for Registered Providers to access relevant survivor information (with consent) to deliver trauma-informed housing offers and minimise re-traumatisation.	Improved suitability of accommodation offers due to greater understanding of needs and risk.	- % Reduction repeat homelessness for DA survivors (below 30%) - Increased accommodation sustainment for survivors of DA	- DA Coordinator - Registered Housing Providers - DA Housing Officers	Year 2
2.24 Develop dedicated housing pathways for survivors with multiple needs and those with No Recourse to Public Funds (NRPF)	Improved partnership working with adult social care, schools and health and holistic support available to whole family.	Reduced homelessness levels due to DA Referral pathway developed for those DA survivors who have NRPF.	- DA Coordinator - DA Housing Officers	Year 3
2.25 Strengthen communication and engagement with schools and health professionals (with consent) to support safeguarding and ensure children affected by domestic abuse are linked to appropriate support services.	Processes are defined and embedded within housing teams, education and health professionals to support early identification.	- Increase in number of children being referred for support into commissioned services by Domestic Abuse Housing Officers (DAHO). - Number of schools engaged with - Number of health organisations engaged with	- DA Coordinator - DA Housing Officers	Year 2
Prison leavers:				
2.26 Review supported and transitional accommodation capacity and barriers to accommodation to ensure that there are pathways into accommodation prior to release.	Reduced homelessness due to leaving prison onto the street or unsuitable accommodation where the prison leaver has a local connection	- Reduction of 10% of individuals with a local connection discharged from custody to the	- Housing Advice/Strategy Team Leaders	Year 2

		streets or into unsuitable emergency accommodation.	- Prison and Probation Service	
2.27 Improve data capture: referrals to Prison Release meetings and homeless assessments before release. Understand the accommodation pathways data including CAS3 accommodation.	Improved understanding of housing needs by Housing Teams through improved data collection from Prisons to provide increased accommodation options for prison leavers	- Reduction of 10% of individuals with a local connection discharged from custody to the streets or into unsuitable emergency accommodation.	- Housing Advice/Strategy Team Leaders - Prison and Probation Service	Year 1
2.28 Increase the number of housing assessments undertaken within prisons to identify a housing solution before release.	Increased upstream working to identify accommodation options thereby improving process for prison leavers and reducing homelessness.	- Number of housing assessments undertaken prior to release.	- Housing Advice/Strategy Team Leaders - Prison and Probation Service	Year 2
2.29 Work with partner housing providers to develop a positive pathway from CAS3 accommodation	More individuals moving on from CAS3 into settled or supported accommodation because RPs understand and can meet needs	- Set up joint meeting with RPs to discuss barriers to rehousing prison leavers and ways to overcome them	- Strategic Housing Officers	Year 1
2.30 Review Worcestershire Criminal Justice Housing and Support Protocol	Protocol is updated to reflect current legislation and service provision	- Protocol updated and signed off. - Reduction of 10% of individuals with a local connection discharged from custody to the streets or into unsuitable emergency accommodation.	- Strategic Housing officers	Year 2
Asylum seekers and refugees:				
2.31 Collaborate with community, voluntary, and faith organisations to develop tailored, culturally appropriate information and guidance for asylum seekers, refugees and those with No Recourse to Public Funds, enabling them to access necessary support.	Comprehensive and culturally appropriate guidance developed.	- meetings held with community, voluntary and faith orgs - guidance developed and shared (if relevant) - links from council websites to relevant websites like Shelter /NRPF network	-Homelessness Partnerships	Year 2
Veterans:				
2.32 Continue to work with the Worcestershire Armed Forces Covenant Partnership to ensure that	- Armed Forces Covenant embedded in housing services (where relevant) so	Number of housing staff received training on the	-WSHOG / Armed Forces Covenant Group	Year 1

there is a good understanding of the Armed Forces Covenant in housing and that organisational policies reflect the needs of the Covenant	there is an improved response to those approaching for housing who are, or have been, armed forces personnel.	Armed Forces Covenant.		

Pillar 3: Preventing crisis - helping people stay in their homes

Action	Measure	Target	Lead	Timescale
3.1 Use the findings of the Homelessness Review Service Mapping and Supported Housing Needs Assessment to explore funding services required (to be commissioned or directly provided by LHAs) to sustain accommodation.	More homelessness cases are prevented from becoming homeless through tailored response that meets needs funded by the LHAs or funding bids	- Gaps are defined - Business case developed for supported housing (if relevant).	Housing Advice Team Leaders / Housing Strategy Officers	Year 3
3.3 Utilise funding to ensure services such as accommodation, floating support, and help with housing costs are all targeted to reduce homelessness through prevention	-Number of households prevented from becoming homeless increases	Increase in the percentage of successful outcomes at preventing or relieving homelessness (5%)	Housing Advice Team Leaders /Housing Strategy Officers	Year 1
3.4 Make use of the government toolkits to aid prevention of homelessness (when available)	-Number of households prevented from becoming homeless increases	Increase in the percentage of successful outcomes at preventing or relieving homelessness (5%)	Housing Advice Team Leaders /Housing Strategy Officers	Year 2

Pillar 4: Improving Emergency Responses - improving temporary accommodation and making people's experiences better

Action	Measure	Target	Lead	Timescale
4.1 Increase the number of high-quality, self-contained, TA units for families with children through working with Registered Housing Providers and considering options such as leasing or purchasing accommodation (funding dependent). Minimise the use of B&B, and other forms of shared accommodation and out of area placements for families with children.	Increase in the number of suitable self-contained TA units within Districts and homeless prevention undertaken to reduce the use of unsuitable, out of area or long term placements in TA to support families in moving on with their lives as quickly as possible. -	- No families placed in shared facility/B&B accommodation for more than 6 weeks. - Increase in No of self-contained temporary accommodation.	Housing Advice Team Leaders / Housing Strategy Officers	Year 2
4.2 Improve the transition of households moving out of TA and into settled accommodation by providing an assessment of support needs and referring families into the appropriate support. This would include sharing the needs assessment with housing providers (with consent) so they can provide a trauma informed housing offer.	Ensure a smooth transition for households between homelessness and being settled permanently.	Number of move-ons from TA sustained for 6 months.	Housing Advice Team Leaders /Housing Strategy Officers	Year 3
4.3 Create family-centred TA solutions: reevaluate the model for families in TA, ensuring that placements consider the impact on children's	Increase in the number of suitable self-contained TA units within Districts and homeless prevention undertaken to reduce	- Review the Temporary Accommodation	Housing Strategy Officers	Year 1

schooling, health, and support networks and help children, families and young people in TA to maintain connections to services and support networks.	the use of unsuitable, out of area or long term placements in TA to support families in moving on with their lives as quickly as possible.	Procurement and Placement policies. - Reduction of the number of households with children in temporary accommodation per 1000 - Ensure no one is in temporary accommodation for more than 12 weeks by the end of the strategy	Housing Advice Team Leaders Housing Advice Team Leaders	Year 2 Year 1 - 5
4.4 Jointly review social housing allocations policies once government's new guidance is available to try to prevent the need for TA or move people on into settled accommodation more quickly if they do need to access TA.	Increase the number of households directly accommodated into a permanent housing solution to reduce the need for temporary accommodation.	- Reduction of the number of households with children in temporary accommodation per 1000 - Review of social housing policies	Housing Advice Team Leaders	Year 2 Year 4
4.5 Develop a resilience plan to address the impacts of rising temporary accommodation use, accommodation costs, and the anticipated loss of grant funding. This will include a review of block booking contracts, introduce dynamic purchasing and reduce the use of spot purchasing.	Improve the cost effectiveness of temporary accommodation used.	- Reduction in temporary accommodation costs - PWLE feedback from families who have experienced TA is gathered and analysed minimum of once per annum - % increase in number of self-contained units of accommodation	Housing Strategy Officers	Year 2 Year 3
4.6 Work with PWLE to analyse the barriers to accessing temporary accommodation and implement solutions e.g. increased security measures, provisions for pets.	Barriers to TA are understood and action taken to overcome barriers	Collect data and analyse the reasons for rejection of TA offers	Housing Strategy Officers	Year 4

Pillar 5: Recovery and Preventing Repeat Homelessness - ensuring people don't experience homelessness more than once and having long term rough sleeping

Action	Measure	Target	Lead	Timescale
5.1 Take action to tackling long term rough sleeping through reviewing: Accommodation-based and floating support/Rough sleeper outreach and intensive support/Rent deposits	All activities to prevent and tackle rough sleeping locally are reviewed and defined, gaps identified and services commissioned to lead to a reduction in rough sleeping.	- Reduction in repeat homelessness of rough sleepers	- Housing Advice/Strategy Team Leaders	Year 1

and rent in advance/No First Night Out Accommodation/Furniture projects		- Reduction in the number of people sleeping rough over the month who are long term (10%)	- Rough Sleeper Co-Ordinator	
5.2 Review opportunities to develop and implement community and peer support models	To have an increase in tenancy sustainment and the engagement of service users.	- 10% increase Rough Sleepers engaging in services who are currently not engaging. - Reduction in the number of people sleeping rough over the month who are long term (10%)	- Housing Advice/Strategy Team Leaders - Rough Sleeper Co-Ordinator	Year 3
5.3 Review opportunities to strengthen advocacy services: increase the availability of independent advocates, particularly for vulnerable groups like young people, those with mental health issues, and DA survivors.	Advocacy services are defined and strengthened to give good quality advice to vulnerable groups.	Meetings with providers in place and pathway to advocacy established.	- Housing Advice/Strategy Team Leaders - Outreach Services - Housing Advice	Year 2
5.4 Investigate with PWLE why there is a high level of repeat homelessness in certain homeless cohorts e.g. DA survivors, rough sleepers, families with complex support needs.	Repeat homelessness is minimised and the drivers of repeat homelessness are understood and minimised	Reduction in repeat homelessness of rough sleepers	- Research and Intelligence Officer	Year 2
5.5 Develop mechanisms for referring temporarily accommodated households (with consent) to medical professionals, schools etc (subject to Government guidance)	Repeat homelessness is minimised and households are safeguarded	More statutory partnerships involved with homeless households.	- WSHOG	Year 1

Stakeholders identified a number of suggestions that are business as usual and as such do not feature in the action plan but will still be delivered. The strategy action plan will be reviewed on an annual basis, and this will include a review of current actions and identification of any new actions required for future years.

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Enforcement and Civil Penalty Policy

Relevant Portfolio Holder	Councillor Sue Baxter
Portfolio Holder Consulted	Yes
Relevant Assistant Director	
Report Author: Katie Sharp-Fisher	Job Title: Private Sector Housing Manager Contact email: k.sharp-fisher@bromsgroveandredditch.gov.uk Contact Tel: 01527 881437
Wards Affected	ALL
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Housing
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Cabinet **RESOLVE** that:-

1. That Members approve the Private Sector Housing Enforcement and Civil Penalty Policy (“the Policy”) attached to this report at Appendix A.

The Cabinet is asked to **RECOMMEND** that: -

2. Delegated authority be granted to the Assistant Director Community & Housing Services, following consultation with the Portfolio Holder for Housing, to update the Policy in line with any legislative or government guidance updates.
3. The Scheme of Delegations be updated to reflect the adoption of the Policy and the new Enforcement powers under the Renters Rights Act 2025 in accordance with the wording set out in Appendix B.

2. BACKGROUND

- 2.1 This report follows on from the previous report to Cabinet regarding the Renters Rights Act dated 20th April 2026. The Private Sector Housing Enforcement and Civil Penalty Notice Policy has been reviewed and re-written in response to the Renters Rights Act 2025, which received Royal Assent on the 27th October 2025, with Phase 1 commencing on the 1st May 2026. This represents a significant update to the Council's

enforcement framework in response to the expanded statutory duties and regulatory burdens introduced by the Renters' Rights Act 2025.

- 2.2 The revised Enforcement and Civil Penalty Notice Policy ("the policy") incorporates new enforcement duties arising from the Renters Rights Act 2025. It does not however alter the Council's overarching approach to how and when the Council decides to take enforcement action. It clarifies and strengthens how existing and statutory powers will be exercised ensuring that enforcement activity remains: -
 - Proportionate
 - Evidence-based
 - Risk-led
 - Consistent with the Regulators Code
- 2.3 The Policy provides a consistent framework for the Council's enforcement functions across a wide range of housing and associated legislation, including primary housing statutes, landlord and tenant law, environmental protection and relevant regulatory regimes such as: -
 - Housing Act 2004
 - Protection from Eviction Act 1977
 - Renters Rights Act 2025
 - Energy Efficiency (Private Rented Property)(England and Wales) Regulations 2015
 - Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- 2.4 The Policy aligns with national best practice, including the Association of Chief Environmental Health Officers (ACEHO) model enforcement and Civil Penalty policy, and establishes a clear, consistent and legally robust framework for enforcement decision making and the application civil penalties.
- 2.5 Approval of the Policy ensures the Council can lawfully and effectively discharge its regulatory responsibilities. Failure to adopt the updated policy would result in: -
 - A lack of alignment with new statutory duties
 - Increased risk of inconsistent or unlawful enforcement
 - Reduced ability to respond to emerging risks in the private rented sector
 - Increased exposure to legal challenge
- 2.6 This Policy applies to all private sector housing-related enforcement functions exercised by the Council, including private rented housing, owner-occupied housing, empty homes, Houses in Multiple Occupation and relevant site-based accommodation, where statutory powers apply.

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2.7 The Policy recognises that most landlords operate responsibly and therefore prioritises advice, engagement and support where appropriate. Formal enforcement is targeted at landlords and managing agents who fail to comply with their legal obligations, ensuring a fair and proportionate regulatory approach.

2.8.1 The Policy establishes a clear framework for decision making, ensuring that enforcement action is based on consistent assessment of risk, harm, vulnerability and evidence. This supports transparency and ensures that cases are progressed in a structured manner.

2.8.2 The policy makes clear that civil financial penalties are not fixed or automatic and must be assessed on a case by case basis. In determining the level of any penalty, officers have regard to statutory guidance, the seriousness of the breach, culpability, harm caused, any aggravating or mitigating factors, and the need for proportionality. Maximum penalties will be reserved for the most serious or deliberate cases of non-compliance.

3. Key Policy Changes

3.1 The Policy reflects the Council's expanded enforcement responsibilities under the Renters Rights Act 2025 and associated housing legislation. It sets out the Council's approach to enforcing statutory requirements relating to, among other matters: -

- misuse of possession grounds
- unlawful rent practices, including rent bidding
- failure to provide prescribed tenancy information
- discriminatory letting practices
- compliance with the Private Rented Sector Database (when in force)

3.2 The Policy adopts the enforcement principles and formalises decision making through: -

- defined investigation thresholds
- evidential and public interest tests
- proportionality assessments
- clear case closure criteria

3.3 It establishes a more robust and intelligence-led approach to enforcement enabling the Council to address serious and systematic non-compliance including: -

- Portfolio-wide investigations of landlords where systemic non-compliance is identified
- Targeted enforcement based on harm, vulnerability and risk

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- Co-ordinated action across multiple properties where landlords or agents demonstrate repeated non-compliance.
- 3.4 The Policy confirms that civil penalty income is ringfenced and it must be reinvested into private sector housing enforcement in accordance with statutory requirements and internal financial governance arrangements. This supports the long term sustainability of the service and potentially reduces the reliance on core Council funding.
- 3.5 The policy provides clarity for residents, landlords and managing agents and partners organisations by confirming that: -
 - the Council acts as a statutory regulator, not an arbitrator of private contractual disputes
 - enforcement action is undertaken only where statutory breaches are identified
 - resources are focused on matters that pose the greatest risk of harm
- 3.6 The implementation of this policy is expected to contribute to improve housing conditions, reduced health risks and increased tenancy security and within the District.

4. OPERATIONAL ISSUES

- 4.1 The Renters Rights Act 2025 significantly expands the Council's regulatory responsibilities, introducing new enforcement duties relating to landlord conduct and tenancy compliance alongside existing Housing Act 2004 duties. The policy complements existing duties in relation to the Housing Health and Safety Rating System (HHSRS), including mandatory action where Category 1 hazards are identified and discretionary action for Category 2 hazards.
- 4.2 The Council anticipates an increase in enforcement activity arising from the use of civil financial penalties. The effective use of civil financial penalties requires a high evidential threshold. Officers must ensure that cases meet the relevant legal tests, including sufficient evidence and public interest considerations, and that all enforcement action is supported by clear and auditable evidence. This includes a higher volume of cases requiring formal investigation, evidence gathering and decision-making to the required legal standard, particularly where penalties must be justified and capable of being defended at appeal.
- 4.3 There is an increased risk of appeals to the First-tier Tribunal where civil penalties are imposed. This requires that all notices, calculations and decision-making processes are legally robust, proportionate and clearly documented to withstand external scrutiny.

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- 4.4 The policy establishes a structured and consistent approach to determining civil penalty levels. This requires officers to assess each case individually, taking into account factors including culpability, harm, aggravating and mitigating circumstances, and the need for proportionality. This approach ensures fairness but increases the time and complexity associated with decision-making.
 - 4.5 The implementation of the policy requires effective case management systems to support the administration of enforcement action, including the preparation of notices of intent, final notices, representations, and appeals. Accurate record keeping is essential to ensure transparency and consistency.
 - 4.6 The recovery of civil financial penalties presents an operational challenge. Payment is not guaranteed and may require additional enforcement action, including debt recovery processes and legal intervention. This introduces additional administrative and financial considerations for the Council.
 - 4.7 The policy requires officers to exercise discretion in determining when to pursue civil penalties as opposed to alternative enforcement options. This necessitates consistent decision-making across the service to ensure that enforcement action is proportionate, targeted and aligned with the Council's wider regulatory objectives.

Implications for the Scheme of Delegations and previous level of civil penalties

- 4.9 As noted at paragraph 3.1 above, under the Renters Rights Act 2025 the scope of the Council's enforcement powers has been expanded. To ensure that officers are able to utilise these powers it will be necessary for some additional delegations to be added to the Officer Scheme of Delegations.
- 4.10 Members are referred to the updated version of the Scheme of Delegations for Strategic Housing at Appendix 2 which sets out the additional delegations sought. The alterations are shown in track changes. Members may recall that delegations were previously approved for other aspects of the Renters Rights Act in April 2026, and these delegations are shown shaded in blue.
- 4.11 In summary the main changes are to enable officers to use all the enforcement powers available to them under the relevant housing legislation. In addition to new powers contained in the Renters Rights Act itself, changes have also been introduced to existing legislation including the Protection from Eviction Act and Housing Acts 2004. There

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is also a move to introduce greater use of civil penalties as an alternative to prosecution.

- 4.12 Members are asked to note that the levels of civil penalties applicable under the Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 will be amended by the policy and the new rates will replace those previously approved by members (Report to Cabinet: Electrical Safety Enforcement Charges in the Private Rented Sector 20th October 2021). Likewise, the new policy will replace the civil penalties applicable to certain offences under the Housing Act 2004 (as amended by the Housing and Planning Act 2016) as previously reported to members on 10th July 2019 (Introduction of Civil Penalties for failure to comply with standards in the private rented sector).

5. FINANCIAL IMPLICATIONS

- 5.1 The implementation of the Renters Rights Act 2025 and the associated Enforcement and Civil Penalty Notice Policy introduces additional financial demands on the Council. These relate primarily to increased enforcement activity, including investigation, case management, legal support, and the administration of civil financial penalties.
- 5.2 New Burdens Funding of £60,000 has been allocated to the Council by Central Government in recognition of the additional duties and responsibilities arising from implementation of the Renters Rights Act 2025. This includes increased activity relating to enforcement of tenancy reforms, illegal eviction and harassment investigations, reporting requirements and wider private rented sector enforcement activity.
- 5.3 At this stage, detailed allocation of funding is still being developed as part of the Council's wider implementation planning arrangements. However, it is anticipated that the funding will support areas such as officer training, legal and governance support, operational readiness, case management system improvements, reporting system improvements, enforcement procedure development and costs associated with enforcement activity and appeals. These measures are intended to ensure that enforcement activity remains consistent, auditable and legally robust.
- 5.4 Government guidance accompanying the funding allocation indicates that the funding is intended to support implementation activity and additional enforcement capacity associated with the new regulatory regime. At the present time, no additional permanent staffing commitments have been approved specifically in relation to this policy

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and staffing implications will continue to be reviewed as operational demand becomes clearer. The Private Sector Housing service is currently operating within existing approved budgets.

- 5.5 Whilst the current funding allocation relates to 2026/27, future enforcement demand, appeal activity and staffing pressures are likely to create additional ongoing financial pressures which will be actively managed through normal budget monitoring arrangements.
- 5.6 Civil financial penalties provide a mechanism for cost recovery and service sustainability. Any income generated from civil penalties must be ringfenced and reinvested into private sector housing enforcement functions in accordance with statutory requirements and internal financial governance arrangements. Government guidance accompanying the funding allocation indicates that authorities are expected to offset a proportion of enforcement costs through the use and recovery of civil financial penalties where appropriate. This reinforces the importance of maintaining robust enforcement, debt recovery and financial governance arrangements.
- 5.7 Income from civil penalties is variable and cannot be relied upon as a guaranteed funding source. The level of income will depend on the number and nature of enforcement cases, the outcome of appeals, and the Council's ability to successfully recover unpaid penalties.
- 5.8 There is a risk that civil penalties may not be recovered in full, particularly where individuals are unwilling or unable to pay. This may result in additional costs associated with debt recovery, including legal action.
- 5.9 The Council must also consider the financial implications of appeals to the First-tier Tribunal. While robust decision-making and evidentially sound enforcement practise minimises the number of appeals and improves outcomes, there remains a risk that some cases will be challenged. Where appeals arise, the Council may incur costs associated with officer time in preparing and presenting cases, and, where necessary, external legal advice. Any associated financial implications will be managed through existing service budgets and funding allocations, with ongoing monitoring through established budget and performance management arrangements.
- 5.10 Overall, the introduction of civil financial penalties supports a more sustainable enforcement model. However, the Council must continue to balance enforcement activity with available resources to ensure that the service remains financially viable and effective.

6. LEGAL IMPLICATIONS

6.1 Amendments to the Scheme of Delegations are required to ensure officers are authorised to exercise enforcement powers and duties under the Renters Rights Act 2025 and related housing legislation. Individual officer authorisations will also be updated accordingly.

6.2 The policy confirms that formal enforcement action will only be taken where evidential thresholds and public interest tests are satisfied, reflecting requirements under the Police and Criminal Evidence Act 1984 and the Code for Crown Prosecutors. The policy also provides clear safeguards in relation to appeals, representations and tribunal proceedings.

7. OTHER - IMPLICATIONS

Local Government Reorganisation

7.1 The Policy has been aligned with ACEHO model enforcement policy and Civil Penalty policy. The new unitary authority will take over these duties as a local Housing Authority.

Relevant Council Priority

7.2 The implementation of the policy supports the Council's ability to meet one of the Council's priorities of 'Community & Housing'. The updated Policy directly impacts upon the residents throughout the community by ensuring that houses are safe and warm enabling the residents to be happy and Bromsgrove a safe place to live.

Climate Change Implications

7.3 The implementation of this policy has a positive impact in relation to climate change. Through the enforcement of housing standards, including the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (Minimum Energy Efficiency Standards), the Council will support improvements to the energy efficiency of residential properties within the private rented sector.

7.4 Improved energy efficiency contributes to reduced carbon emissions, lower energy consumption and enhanced thermal performance of housing stock. This supports wider national and local climate change objectives, while also delivering benefits in terms of reduced fuel poverty and improved health outcomes for residents

Equalities and Diversity Implications

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- 7.5 The implementation of this policy has been considered in the context of the Council's duties under the Equality Act 2010, including the Public Sector Equality Duty. The policy supports the Council's obligation to eliminate discrimination in the exercise of its enforcement functions.
 - 7.6 Enforcement activity under this policy is expected to have a positive impact on vulnerable households, including those with protected characteristics, who are disproportionately affected by poor housing conditions and unlawful practices within the private rented sector.
 - 7.7 The policy embeds a risk-based approach to enforcement, which includes consideration of vulnerability and individual circumstances when prioritising cases and determining appropriate action. This ensures that enforcement decisions are proportionate, fair and responsive to the needs of those at greatest risk of harm.
 - 7.8 No adverse equality impacts have been identified. An Equality Impact Assessment will be completed prior to the implementation of this policy. While the policy primarily reflects statutory duties, the Council retains discretion in how enforcement powers are exercised. The assessment will ensure that due regard has been given to the Public Sector Equality Duty under the Equality Act 2010, including consideration of potential impacts on vulnerable groups and those with protected characteristics.

8. RISK MANAGEMENT

- 8.1 The implementation of the Enforcement and Civil Penalty Notice Policy introduces a number of operational and strategic risks. These risks have been identified and mitigation measures are in place to ensure that enforcement activity is effective, proportionate and legally robust.
- 8.2 There is a risk that enforcement action, including the serving of civil financial penalties, may be subject to challenge or appeal where processes are not correctly followed or decisions are not sufficiently evidenced.
Mitigation: The policy establishes clear evidential thresholds, decision-making frameworks and procedural requirements aligned with statutory guidance. Officers will receive appropriate training and access to legal support to ensure compliance with relevant legislation and procedural standards.
- 8.3 There is an increased likelihood of appeals to the First-tier Tribunal, which may result in penalties being reduced, overturned, or subject to delay.
Mitigation: The policy embeds a structured and consistent approach to determining civil penalties, supported by clear

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reasoning, proportionality assessments and robust documentation to ensure decisions are defensible.

- 8.4 Income from civil financial penalties is not guaranteed and there is a risk that penalties may not be recovered in full, resulting in additional costs associated with debt recovery and legal proceedings.

Mitigation: The policy details appropriate debt recovery processes and penalty levels have been set in accordance with statutory guidance to maximise compliance and recovery where appropriate.

- 8.5 Increased enforcement activity may place pressure on staffing and resources, particularly where cases are complex and require significant officer time to investigate, prepare and defend enforcement action.

Mitigation: New Burdens Funding has been allocated to support implementation of the Renters Rights Act 2025 and associated enforcement activity. The Council will continue to monitor operational demand, staffing capacity, appeals activity and service pressures through normal management and budget monitoring arrangements. Officer training, procedural guidance and case management systems will support the efficient prioritisation and progression of enforcement cases.

- 8.6 There is a risk of inconsistent enforcement decisions across the service, which could undermine fairness and increase the likelihood of challenge.

Mitigation: The policy provides a clear and structured framework for enforcement decisions, including defined thresholds, proportionality assessments and case closure criteria (where compliance has been achieved, enforcement action has concluded or no further action is required) to ensure consistency across officers.

- 8.7 Enforcement action, particularly the use of civil financial penalties, may attract challenge or criticism from landlords or other stakeholders. Equally, failure to take appropriate action may undermine public confidence in the Council's regulatory role.

Mitigation: The policy promotes a balanced approach to enforcement, prioritising advice and engagement where appropriate, while ensuring that formal action is taken where statutory breaches are identified.

- 8.8 Effective enforcement relies on accurate record keeping and evidence management. There is a risk that inadequate systems or processes could weaken enforcement cases.

Mitigation: Investment in case management systems and clear procedural requirements will ensure that evidence is properly

recorded, retained and accessible to support enforcement action and appeals.

- 8.9 There is a risk that future enforcement demand, appeal activity and staffing pressures may exceed available funding or create additional financial pressures for the Council.

Mitigation: The Council has received New Burdens Funding to support implementation of the new regulatory regime and will continue to monitor enforcement activity, appeal trends, staffing pressures and associated financial implications through existing financial governance and budget monitoring arrangements. Civil financial penalties may assist in offsetting a proportion of enforcement costs where recovery is successful; however, income from penalties will not be relied upon as a guaranteed funding source.

- 8.10 There is a risk that increased use of civil penalties may influence landlord behaviour, including market withdrawal or reduced supply in the private rented sector, which may indirectly impact housing availability

Mitigation: The Council will ensure that enforcement activity is proportionate, targeted and intelligence-led, focusing on serious or repeat non-compliance rather than minor breaches. The policy prioritises advice and engagement where appropriate, with formal enforcement action directed at those who fail to meet their legal obligations. All enforcement decisions will be underpinned by statutory guidance, the Regulators' Code and robust proportionality assessments to ensure fairness and consistency. The Council will monitor enforcement activity, appeal outcomes and local market conditions to identify any unintended impacts on the private rented sector and will keep its approach under regular review to maintain an appropriate balance between regulatory intervention and market stability.

- 8.11 These risks will be monitored as part of ongoing service management, financial monitoring and governance arrangements, and the policy will be kept under review to ensure that it remains effective, proportionate and aligned with legislative requirements.

9. APPENDICES and BACKGROUND PAPERS

Appendices

Appendix A - Private Sector Housing Enforcement & Civil Penalty Notice Policy 2026

Appendix B – Scheme of Delegations for Strategic Housing with amendments shown in track changes

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Background papers

Reports to Cabinet

Renters Rights Act 2025 – 20th April 2026

Electrical Safety Enforcement Charges in the Private Rented Sector - 20th October 2021

Introduction of Civil Penalties for failure to comply with standards in the private rented sector – 10th July 2019

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Cllr Sue Baxter	28/05/2026
Lead Director / Assistant Director	Judith Willis Assistant Director Community and Housing Services	08/05/2026
Financial Services	Deb Goodall Assistant Director Financial Services	08/05/2026
Legal Services	Nicola Cummings, Principal Solicitor – Governance and Jess Bayley-Hill, Principal Democratic Services Officer	08/05/2026

APPENDIX A
BROMSGROVE DISTRICT
COUNCIL
PRIVATE SECTOR
HOUSING
ENFORCEMENT & CIVIL
PENALTY POLICY 2026

1. Background

Bromsgrove District Council (“the Council”) has statutory duties to keep housing conditions in its area under review and to take appropriate action where residential accommodation presents risks to health, safety or welfare, or where housing related legislation is not being complied with. This policy sets out the Council’s principles for enforcing and exercising its duties as a Local Housing Authority under the relevant legislation. It has been developed having regard to government statutory guidance and recognised good practice frameworks including the Association of Chief Environmental Health Officers (ACEHO) model.

Local authorities exercising regulatory functions are required by section 5 of the Legislative and Regulatory Reform Act 2006 to publish an enforcement policy. Where regulatory functions fall within the scope of the Regulators Code, the Council is also required to have regard to that Code in the exercising of those functions. This policy provides transparency and consistency in the way the Council carries out its enforcement functions and ensures that regulatory activity is proportionate, targeted and accountable in regard to private sector housing enforcement.

This policy explains how the Council will approach housing enforcement across the private sector and how enforcement decisions will be made. It establishes the principles that guide enforcement activity and provides clarity to landlords, tenants, managing agents and other stakeholders about what can be expected from the Council when regulatory intervention is considered necessary.

In developing this policy, the Council has had regard to relevant statutory guidance and good practise. The Council will support compliance through advice and engagement where this is appropriate and likely to be effective. However, the Council is not required to take informal action before exercising its statutory enforcement powers and may take formal action where this is necessary and proportionate to protect residents, address serious risks, and secure compliance with legal requirements.

The need for a clear and robust enforcement approach is informed by local housing conditions. Evidence indicates that a higher proportion of private rented properties contain serious hazards or fail to meet minimum standards compared with owner occupied housing throughout the District. The Private Sector Housing Stock Condition Survey 2024 indicates that approximately 9.1% of all dwellings contain a Category 1 hazard.

The same survey identified that approximately 14.5% of private rented homes and 12.2% of owner-occupied homes do not meet the Decent Homes Standard. By comparison, the English Housing Survey (2020) estimates that 17.5% of private rented

homes and 15.1% of owner-occupied homes across the West Midlands do not meet the Decent Homes Standard. While overall housing conditions in the District compare favourably with regional averages, a significant number of properties still require intervention to address risks to occupants. This evidence supports the Council's use of a targeted and risk-based approach to enforcement activity. Detailed information on enforcement tools, procedures, penalties and officer decision making is set out in the sections that follow.

For the purposes of this policy, the term “*landlord*” includes letting agents, managing agents, licensors, property owners, directors of corporate landlords and any other person involved in the letting or management of privately rented accommodation. The terms “*House in Multiple Occupation*” (HMO) have the meaning set out in the Housing Act 2004. The term ‘corporate landlord’ should be read as referring to a corporate body that meets the definition of ‘landlord’ above.

For the avoidance of doubt, references in this policy to a “dwelling” have the meaning given by section 99 of the Housing Act 2004. The Housing Health and Safety Rating System applies only to premises that fall within that statutory definition. Caravans and mobile homes do not generally constitute dwellings for the purposes of Part 1 of the Housing Act 2004 and are not assessed under the HHSRS. Such accommodation is instead subject to regulation and enforcement under other applicable legislation, including the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013.

2. Aims

The aim of this policy is to ensure housing enforcement action is taken lawfully, fairly and proportionately, in accordance with relevant legislation and statutory guidance, while supporting the Council's wider housing objectives. Through effective regulation and enforcement detailed within this policy provides a framework through which the Council seeks to: -

- Improve the quality of housing across the District
- Tackle fuel poverty and poor housing conditions
- Reduce the number of empty homes
- Support wider public health objectives and reducing health inequalities
- Support tenancy sustainment and reducing homelessness, particularly for vulnerable households
- Ensure landlords comply with their legal responsibilities
- Prevent the exploitation and poor treatment of tenants
- Contribute to safer, healthier local communities

The Council recognises that most landlords operate responsibly. The Council will therefore seek to support compliance through advice and engagement where this is appropriate and likely to be effective. However, where legal requirements are not met or risks to health or safety persist, the Council will take proportionate and effective

enforcement action. Effective enforcement is essential to maintaining confidence in the private rented sector and ensuring that responsible landlords are not undercut by those who choose to operate unlawfully.

3. Scope

This policy applies to all private sector housing enforcement activity undertaken by the Council within its administrative area. It applies to all residential accommodation with the exception of Bromsgrove District Council owned stock where statutory hazards or nuisances arise. The Council's private sector housing enforcement functions include the following areas: -

- **Housing Standards and Property Conditions**
 - Privately rented properties and Housing Association properties
 - Houses in Multiple Occupation (HMOs), including licensable and non-licensable HMOs for licensing and management standards
 - Owner occupied housing where hazards or statutory nuisances may arise
 - Empty properties
 - Buildings or structures used or intended to be used for human habitation, including outbuildings, sheds, garages or other non-traditional structures where occupation gives rise to risks to health, safety or welfare.
- **Tenancy Regulations and Landlord Conduct**
 - Enforcement of landlord obligations, tenancy requirements and tenant protections introduced by the Renters Rights Act 2025
 - Illegal eviction and harassment offences
- **Other Private Sector Housing Enforcement**
 - Residential mobile homes and caravan sites including licensing and site standards
 - Unauthorised encampments where the Council acts in its capacity as a land owner

All enforcement action will be carried out in accordance with relevant statutory Codes of Practice, Council procedures and protocols, and official guidance issued by central and local government bodies. In exercising its enforcement functions, the Council will act in accordance with the Equality Act 2010.

The Council recognises that certain aspects of housing-related enforcement fall under the remit of other regulatory services. In particular, enforcement of tenancy fees and prohibited payments under the Tenant Fees Act 2019 is primarily undertaken by Trading Standards. However, Private Sector Housing may identify potential breaches during the course of their duties. Where such matters are identified, cases will be

referred to Trading Standards for investigation where appropriate. The Council will work collaboratively with partner services to ensure a coordinated and proportionate enforcement response.

4. Roles and Responsibilities

The effective regulation of private sector housing requires cooperation between the Council, landlords, agents, tenants and partner agencies. The following sets out the general expectations of each party.

Authorised Officers

Authorised officers will: -

- Act in accordance with this Policy, relevant legislation and statutory guidance
- Exercise professional judgement in determining appropriate enforcement action
- Act proportionately, consistently and transparently
- Ensure that decisions are properly evidenced, recorded and capable of withstanding legal scrutiny;
- Have regard to vulnerability, safeguarding considerations and equality duties when exercising enforcement functions

Landlords, Letting Agents and Managing Agents

Landlords and agents are expected to: -

- Maintain properties in compliance with all relevant legal requirements
- Respond promptly to tenant reports of disrepair or hazards
- Engage constructively with the Council and comply with statutory notices and requests for information
- Ensure that letting and management practices comply with all relevant tenancy and consumer protection legislation
- Take proactive steps to prevent risks to health and safety

Tenants and Occupiers

Tenants are expected to: -

- Report defects and hazards to their landlord or managing agent in the first instance, where it is safe and reasonable to do so
- Provide access for inspections and works where required
- Act in a tenant-like manner and not cause damage or contribute to unsafe conditions

Partner Agencies

The Council will work with partner agencies, including the Police, Fire Service, Trading Standards, Housing Options and safeguarding services, to ensure a coordinated and effective response to housing-related risks.

5. Legislative Framework

Bromsgrove District Council acts as the Local Housing Authority responsible for regulating housing conditions and tenancy practices within the District. Under section 3 of the Housing Act 2004, the Council has a statutory duty to keep housing conditions in its district under review with a view to identifying any action that may need to be taken. Where hazards are identified (as defined by the Housing Act), the Council has powers and duties to take appropriate enforcement action in accordance with Part 1 of the Act.

Section 5 Housing Act 2004 places a duty on Local Authorities to take appropriate enforcement action where a Category 1 hazard exists. Section 7 of the Housing Act 2004 gives the Council a discretionary power to take enforcement action where a Category 2 hazard exists. The Council will usually act where a Category 2 hazard presents a significant risk to health or safety.

Section 107 of the Renters' Rights Act 2025 places a duty on the Council to enforce the landlord legislation including statutory duties and offences relating to tenancy standards, security of tenure, eviction practices, information requirements, rent practices and discrimination, as set out in the Act and associated legislation comprising of the following: -

- Chapters 3 and 6 of Part 1 of the Renters Rights Act 2025;
- Part 2 of the Renters' Rights Act 2025;
- Sections 1 and 1A of the Protection from Eviction Act 1977; and
- Chapter 1 of Part 1 of the Housing Act 1988.

Section 110, which places a duty on the Council to report to the Secretary of State on the exercise of its functions under the Landlord Legislation.

The Renters Rights Act 2025 and Part 1 of the Housing Act 2004 fall outside the scope of the Regulators Code. Where the Code does not apply, the Council will nevertheless seek to act in accordance with the principles of good regulation unless statutory duties require otherwise.

Other housing legislation enforced by the Council does however fall within the scope of the Legislative and Regulatory Reform (Regulatory Functions) Order 2007, and the Council will act in accordance with the principles of good regulation where applicable. Legislation within the scope of the Regulators Code includes (but is not limited to): -

- Parts 8, 9 and 10 of the Housing Act 1985;
- Part 8 of the Housing Act 1996; and
- Parts 2 to 5 of the Housing Act 2004.

5.1 Primary Legislation

When exercising its housing enforcement functions, the Council may rely on the following primary legislation, where relevant (this list is not exhaustive): -

- Housing Act 2004
- Housing Act 1985
- Housing Act 1988
- Renters Rights Act 2025
- Housing and Planning Act 2016
- Protection from Eviction Act 1977
- Environmental Protection Act 1990
- Building Act 1984
- Caravan Sites and Control of Development Act 1960
- Mobile Homes Act 2013
- Police and Criminal Evidence Act 1984
- Criminal Justice & Public Order Act 1994
- Public Health Act 1961
- Prevention of Damage by Pests Act 1949
- Proceeds of Crime Act 2002
- Local Government (Miscellaneous Provisions) Act 1976
- Local Government (Miscellaneous Provisions) Act 1982
- Legislative and Regulatory Reform Act 2006
- Regulation of Investigatory Powers Act 2000

5.2 Secondary Legislation

Relevant secondary legislation includes (but is not limited to): -

- Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended)
- Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (as amended)
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007
- Mandatory Licensing of Houses in Multiple Occupation (England) Order 2018
- Any regulations made under or associated with the Renters Rights Act 2025 relevant to the Council's enforcement functions

The Council's enforcement responsibilities include both housing condition and tenancy related regulatory functions. All enforcement action will be taken in accordance with relevant statutory Codes of Practice, Council procedures, and official guidance. In exercising its functions, the Council will act in accordance with the Human Rights Act 1998 and the Equality Act 2010. All enforcement powers under the legislation referred to in this policy are exercised by officers authorised by the Council in accordance with its Constitution, scheme of delegation, and officer authorisation procedures.

6. Regulatory Principles

The Council fulfils its regulatory role through a combination of proactive inspection, intelligence-led investigation, reactive complaint response and multi-agency working. The Council may investigate: -

- The physical condition of residential accommodation
- Management of the residential accommodation/mobile home site
- The conduct of landlords, agents and other relevant persons
- Compliance with relevant legislation.

In order to secure compliance, the Council may use the full range of statutory powers where available, necessary and proportionate to protect occupants and improve housing conditions. In carrying out its regulatory functions, the Council will act in accordance with the following principles of good regulation: -

- **Proportionate** – Enforcement action will reflect the seriousness of the breach and the risks posed to occupants.
- **Targeted** – Resources will be directed towards the most serious housing hazards, the highest risks to health and safety, and the most serious or repeated breaches of landlord obligations.
- **Consistent** – Similar cases will be treated in a consistent manner, while recognising the specific circumstances of each case.
- **Transparent** – Landlords, tenants and property owners will be provided with clear information about legal requirements and enforcement decisions.
- **Accountable** – Officers will explain enforcement decisions and provide information on rights of appeal and complaint procedures.

Advice, guidance and engagement may be used where appropriate and likely to be effective, but nothing in this policy requires the Council to take informal action before exercising formal enforcement powers.

7. Prioritisation and Use of Discretion

The Council has a duty to regulate housing conditions and tenancy practices across the District; however, it is not required to investigate every potential breach. Enforcement activity will be prioritised based on: -

- The level of risk to health or safety
- Evidence of non-compliance
- The potential harm to occupants or the wider community.

Nothing in this policy creates a duty on the Council to take enforcement action in any particular case, nor does it confer a right on any person to require the Council to investigate or act. The Council retains discretion to determine whether to investigate and whether to exercise any of its statutory powers, having regard to the available evidence, the relevant legal framework, and the professional judgement of authorised officers.

The Council may only exercise enforcement powers in respect of properties located within its district, unless another Local Housing Authority has formally delegated functions to Bromsgrove District Council. Where a landlord or business is subject to a Primary Authority partnership, the Council will have regard to the applicable Primary Authority and its advice in accordance with statutory requirements. For the purposes of this policy, a *Primary Authority partnership* is an arrangement under Part 2 of the Regulatory Enforcement and Sanctions Act 2008 under which a business receives assured advice from a nominated enforcing authority.

The Council may have regard to patterns of conduct across a landlord's property portfolio, including evidence of repeated breaches, systemic non-compliance or failure to respond to previous enforcement action. This may include reviewing enforcement history, regulatory datasets, licensing records, housing benefit, council tax or information lawfully shared by partner agencies.

Where a complaint has been investigated and inspected and an authorised officer is satisfied, that no actionable hazard or breach of housing legislation exists, the case will be closed with no further action. The Council is not required to carry out repeated inspections where issues have already been assessed and no breach identified. The local authority will not normally undertake further investigation unless new evidence or materially changed circumstances are presented. The Council retains discretion to determine whether further investigation is appropriate in any individual case.

Where landlords or property owners fail to meet their legal responsibilities, or where housing conditions or tenancy practices present a risk to the health or safety of occupiers, the Council will take proportionate enforcement action. The Council

recognises that poor housing conditions and unsafe tenancy practices can have a disproportionate impact on vulnerable residents and will prioritise enforcement action where serious hazards affect those at greatest risk. In deciding whether, when, and how to pursue enforcement and recovery action, the Council will have regard to any known vulnerability, health needs or welfare concerns, while ensuring that legal requirements are enforced and unlawful conduct is not left unaddressed.

In exercising its discretion, the Council may have regard not only to the underlying breach, but also to a person's conduct following enforcement action, including any failure to engage, delay, or comply with requirements such as the payment of civil financial penalties.

8. Initial Complaints and Informal Resolution

The Council will normally expect that, where appropriate and safe to do so, tenants will first raise concerns regarding housing conditions with their landlord or managing agent. Landlords are expected to take reasonable steps to investigate and address reported issues within a reasonable timeframe. The Council may take this into account when determining whether to intervene; however, this will not prevent the Council from taking immediate action where: -

- there is a serious risk to health or safety;
- there is evidence of harassment, illegal eviction or retaliatory action;
- the occupier is vulnerable; or
- there is clear evidence of non-compliance.

Nothing in this section limits the Council's discretion to take formal enforcement action at any stage where it considers it necessary and proportionate.

9. Investigatory powers and powers of entry

In addition to the Council's informal and formal powers of enforcement, there are investigatory powers relating to the collection of information and relating to the entry of premises. Investigatory powers will only be exercised where it is necessary and proportionate to do so for the purposes of enforcing housing legislation and in accordance with statutory safeguards. For the purposes of this section, *rented accommodation legislation* means: -

- Sections 1 and 1A of the Protection from Eviction Act 1977;
- Chapter 1 of Part 1 of the Housing Act 1988;
- Parts 1 to 4 and 7 of the Housing Act 2004 ;
- Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013;
- Sections 21 to 23 of the Housing and Planning Act 2016;
- Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.

9.1 Power to Investigate

Section 114 Renters Rights Act 2025 gives the Council power to issue a notice to a relevant person to require that person to provide specified information to the Council. This notice may be given to any person with an estate or interest in the land, the licensor, their agents, or a marketer of a property. It may be served for the investigation relating to the rented accommodation legislation.

Failure to comply with section 114 notice is an offence under section 131 Renters Rights Act 2025, as is being obstructive and intentionally or recklessly making false or misleading statements in response to a section 113 notice. Section 115 Renters Rights Act 2025 permits the Council when it reasonably suspects a breach of the rented accommodation legislation to issue a notice to any person requiring them to provide the information specified. This may only be done to investigate whether a breach has occurred under rented accommodation legislation, or to determine the amount of a penalty.

Where an individual has not complied with a section 115 notice, section 116 Renters Rights Act 2025 enables the Council to make an application to the Court to enforce the provisions of the notice and seek reimbursement for the costs of the application. Section 131 Renters Rights Act provides that, in addition to the offence of non-compliance with a Section 114 notice, it is an offence for an individual to obstruct a Council officer seeking to exercise their powers without reasonable excuse. It is also an offence to fail to give an officer any additional assistance or information which they reasonably require without reasonable excuse.

Section 235 Housing Act 2004 allows the Council to issue a notice to relevant individuals, including occupiers, directing them to provide specified documents under their control for the purpose of investigating whether an offence has been committed under Parts 1 to 4 of the Housing Act 2004 or exercising the Council's functions under Parts 1 to 4 of the Housing Act 2004.

Section 16 Local Government (Miscellaneous Provisions) Act 1976 also permits the Council to issue a notice to an occupier, manager, or individual with an interest in the land to compel them to provide the Council with information on the nature of their interest and the names and addresses of current occupiers and of any others with an interest in the land.

Where relevant to the Council's housing enforcement functions, investigatory powers may also be exercised under the Environmental Protection Act 1990 and the Prevention of Damage by Pests Act 1949 for the purposes of investigating statutory nuisances or pest-related conditions affecting residential premises.

10. Decision Making Framework

The Council adopts a structured and proportionate approach to decision-making in all enforcement cases. The purpose of this framework is to ensure that enforcement action is consistent, transparent, evidence-based and proportionate to the risk posed. Enforcement decisions will be informed by a range of factors including: -

- The seriousness of the breach
- The level of risk or harm to occupants or the wider community
- The vulnerability of those affected
- The conduct, culpability and compliance history of the landlord or responsible person
- The likelihood of achieving compliance through different forms of intervention.

To support consistency in decision-making, the Council applies a structured escalation approach which reflects the severity of the case.

Band 1 – Informal Resolution

Cases involving minor deficiencies or low risk where there is no immediate threat to health or safety. Action is likely to include advice, guidance, or informal engagement.

Band 2 – Non-Punitive Formal Action

Cases where there is evidence of non-compliance but the risk remains moderate and can be addressed without punitive action. Action may include formal notices, licence conditions, or other regulatory interventions designed to secure compliance.

Band 3 – Formal Enforcement

More serious cases involving significant non-compliance, elevated risk, or failure to respond to previous interventions. Action may include civil financial penalties, formal investigations, or other enforcement measures.

Band 4 – Serious / High Harm Cases

The most serious cases involving significant harm, deliberate or reckless conduct, or repeated non-compliance. Action is likely to include prosecution, banning order applications, or the imposition of substantial financial penalties.

The bands are intended to guide and support officer decision-making. Each case will be considered on its individual merits, and authorised officers retain discretion to depart from this framework where justified, provided that the reasons for doing so are properly recorded.

Recording of Decisions

All enforcement decisions will be documented in accordance with the Council's procedures and governance arrangements. Records will include the evidence relied upon, the options considered, and the reasons for the decision taken. Where

prosecution or other formal legal action is proposed, cases will be reviewed in accordance with the Code for Crown Prosecutors and, where required, in consultation with Legal Services.

Records will, where appropriate, include: -

- the nature of the breach or hazard identified
- the evidence relied upon
- the relevant legislative provisions
- the enforcement options considered
- the reasons for selecting the chosen course of action
- consideration of proportionality, vulnerability and public interest
- details of officer authorisation and, where required, legal advice

This ensures transparency, consistency and that decisions are capable of withstanding challenge through appeal, complaint or legal proceedings.

11. Entry to Premises

Section 118 Renters Rights Act 2025 permits Council officers to enter business premises of relevant people (including landlords, letting agents, and marketers) if it is necessary for the production or seizure of documents under section 122-123 Renters Rights Act 2025. This power will be exercised without a warrant.

Section 121 Renters Rights Act 2025 allows an authorised Council officer named in a warrant to enter premises used for a rental sector business which is not mainly accommodation if there are documents on the premises which the officer could require under section 122 or seize under section 123. In addition, for this power to be exercised, one of the following conditions must be met: -

- That access to the premises has been or is likely to be refused, and the Council has provided notice of their intention to apply for a warrant to the occupier
- Those documents on the premises would likely be concealed or interfered with if notice of entry were to be given
- That no occupier is present, and waiting for their return might defeat the purpose of the entry

Following a section 118 or section 121 Renters Rights Act 2025 entry, section 122 allows an officer at any reasonable time to require a relevant person on the premises to produce any documents relating to the business and to take copies of them. This may only be exercised to ascertain whether there has been a breach of the rented accommodation legislation where an officer reasonably suspects there has been a breach or an offence; or to ascertain whether the documents may be required in evidence for proceedings regarding a breach or offence.

Following a section 118 or section 121 Renters Rights Act 2025 entry, section 123 authorises Council officers to seize and detain documents that the officer reasonably suspects may be required as evidence in proceedings relating to a breach of, or an offence under, the rented accommodation legislation. When doing so, the officer will provide evidence of the officer's identity and authority if reasonably practicable. The officer will take reasonable steps to inform the person from whom documents have been seized that they have been seized and will provide that person with a written record of what has been taken. Documents seized will be retained only for as long as reasonably necessary for the purposes of the investigation or any related proceedings and will be returned as soon as practicable thereafter, unless lawfully retained.

Section 126 Renters Rights Act 2025 permits the Council to enter residential premises used for a tenancy at a reasonable time if the officer considers it necessary as part of an investigation into potential offences specified in subsection 1(b). Where required, the Council will give at least 24 hours' notice of this to the occupier and individuals with an interest in the property as per subsection 1(c), detailing in writing why the entry is necessary and the suspected offences. Where there are occupiers found on the premises, the officer will provide evidence of the officer's identity and authority to at least one of the occupiers if reasonably practicable.

In addition, section 239 Housing Act 2004 permits Council officers to enter, if necessary and at a reasonable time, a property to carry out a survey or examination. This may be done if any one of the following is met: -

- to determine if any Part 1-4 enforcement functions should be exercised
- the premises are part of an Improvement Notice or Prohibition Order
- a management order is in force under Chapter 1 or 2 of Part 4 on the premises

In certain circumstances the Council may obtain a warrant to enter by force, if necessary, under section 240 Housing Act 2004.

11.2 Other Statutory Powers of Entry

In addition to the investigatory powers contained within the Renters Rights Act 2025 and the Housing Act 2004, the Council has powers under a range of other primary legislation to enter premises, obtain information and carry out inspections for the purposes of enforcing housing, public health and related regulatory requirements.

Under section 81 of the Environmental Protection Act 1990 and associated provisions of that Act, the Council has powers of entry for the purposes of investigating and dealing with statutory nuisances, including conditions that may be prejudicial to health or constitute a nuisance. Council officers may enter premises at reasonable times to

investigate complaints, carry out inspections, assess conditions, take measurements or gather evidence for the purposes of determining whether a statutory nuisance exists or for taking enforcement action under the Act. Where required by the legislation, advance notice will be given. Where entry is refused or otherwise obstructed, the Council may apply to the court for a warrant authorising entry.

Under the section 4 of the Prevention of Damage by Pests Act 1949 and associated provisions of that Act, the Council has powers to enter land or premises for the purpose of inspecting for, preventing or dealing with infestations of rats or mice. These powers may be exercised to establish whether treatment or works are required, to monitor compliance with statutory notices, or to carry out works in default where appropriate. Entry will normally be at reasonable times and in accordance with the procedural requirements of the Act.

Under section 95 of the Building Act 1984, the Council may exercise powers of entry for the purpose of carrying out functions under the Act, subject to the statutory requirements relating to notice and warrants. These powers may be used in connection with those building-related functions and delegations exercised by the Council, such as inspections relating to drainage, defective buildings or dangerous land. Where necessary and permitted by law, the Council may apply to the court for a warrant authorising entry, including entry by force.

The Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013 operate together to regulate residential caravan and mobile home sites. The Mobile Homes Act 2013 strengthens the site licensing and enforcement regime under the 1960 Act, including compliance notices, emergency action and works in default.

Under section 26 of the Caravan Sites and Control of Development Act 1960, authorised Council officers have powers to enter land used as a caravan site, including licensed residential caravan sites, at reasonable times and on production of authority if required. Entry may be exercised for the purposes of inspecting sites, assessing compliance with site licence conditions, investigating potential contraventions and taking enforcement action where permitted. Where required by law, at least 24 hours' notice of entry will be given to the occupier. Where entry is refused, anticipated to be refused, or where giving notice would defeat the purpose of entry, the Council may apply to the court for a warrant authorising entry, including entry by force where permitted by statute.

In relation to empty or unoccupied residential premises, the Council may exercise powers of entry where authorised by relevant legislation and where inspections are necessary to assess risks to neighbouring properties or the wider community. Such entry may be undertaken, where statutory requirements are met, under provisions including the Housing Act 2004, the Environmental Protection Act 1990, the Building

Act 1984, or the Local Government (Miscellaneous Provisions) Act 1982. These powers may be used, for example, to investigate potential housing hazards, statutory nuisances, dangerous conditions, or to secure unoccupied buildings where this is necessary in the interests of public safety.

Any powers of entry in relation to empty or unoccupied premises will be exercised in accordance with the specific procedural requirements of the relevant legislation, including notice and warrant provisions where applicable.

11.3 General Provisions

Where legislation requires notice to be given prior to entry, the Council will comply with those requirements. Where consent to enter is refused, or where entry is otherwise impracticable, the Council may apply to the court for a warrant authorising entry, including entry by force where permitted by law. All powers of entry will be exercised reasonably and proportionately, and in accordance with: -

- Relevant statutory provisions and safeguards
- Applicable Codes of Practice
- Council procedures and governance arrangements
- The Human Rights Act 1998 and the Equality Act 2010.

Entry powers will be exercised only where necessary and proportionate for the purposes of enforcing relevant legislation and securing compliance.

12. Enforcement Action

The Council aims to support responsible landlords and property owners to raise and maintain housing standards. Landlords are expected to have an appropriate understanding of the legal requirements relating to the condition and management of privately rented accommodation and to take proactive steps to ensure compliance.

The Council will seek to secure compliance through advice, guidance and engagement wherever this is appropriate and likely to be effective. However, the Council is not required to take informal action before taking formal enforcement action and may proceed directly to formal measures where it considers this necessary and proportionate, having regard to the seriousness of the breach and the risk of harm.

In deciding the most appropriate course of action, officers will have regard to the circumstances of the case, the nature and extent of any breach, the degree of risk posed to occupiers or others, and the likelihood of achieving compliance within a reasonable timeframe.

12.1 Informal action

Informal enforcement action may include the provision of written or verbal advice, guidance, warnings, or requests for voluntary compliance. In some cases, a visit by authorised officers may be undertaken at the outset where an initial complaint, referral or other information indicates that an inspection or investigation is warranted.

Where officers visit a property, whether following a complaint, as part of a planned audit, or because of a landlord's failure to adequately resolve a reported issue informal action may be considered sufficient where only very minor deficiencies are identified and there is no immediate risk to health or safety. Where written advice is provided, this will normally specify the action required and include reasonable timescales for compliance.

While the Council will use its discretion on whether to take informal action in cases involving Category 2 hazards, it is not required to provide written or verbal advice before commencing formal enforcement action and may proceed directly to statutory measures where this is considered appropriate.

In relation to matters regulated under legislation other than the Housing Act 2004 and the Renters Rights Act 2025, the Council may also seek to secure compliance through informal enforcement action where it considers this appropriate. Informal engagement may be used where inspections or investigations identify minor deficiencies, low level breaches, or matters that do not present an immediate risk to health or safety.

12.2 Formal action

Formal enforcement action may be taken where informal action is ineffective, inappropriate, or insufficient to address risks to health, safety or the environment, or where the Council considers that informal engagement is unlikely to secure compliance. Formal enforcement action may be taken without prior informal action where, for example: -

- there are serious risks to health or safety
- there is deliberate, reckless or blatant non-compliance
- there is a history of previous breaches or failures to comply, or
- informal engagement is unlikely to achieve timely or effective compliance

The Council will therefore select the most appropriate enforcement tool having regard to the relevant legislation, the circumstances of the case, and the principle of proportionality.

The following sections describe the principal statutory enforcement powers available to the Council under specific legislative regimes. The choice of enforcement tool in any case will depend on the nature of the breach, the level of risk, the evidence available, and what is necessary and proportionate to secure compliance and protect occupants.

12.3 Enforcement

12.3.1 Housing Act 2004 Part 1

Where hazards are identified in a dwelling, the Council may exercise its powers under Part 1 of the Housing Act 2004. These powers include the service of the following notices and orders: -

- **Improvement Notice** – In respect of any Category 1 hazards and any Category 2 hazards. This requires the person to whom it is served to undertake the specified remedial action within a stated period. The mandated work and the timeframe will be determined by the Council depending on the nature and scale of the work.
- **Prohibition Order** - In respect of any Category 1 hazards and any Category 2 hazards on the property. This prevents occupation of whole or part of the property, or can be used to limit occupant numbers, within a specified time frame.
- **Hazard Awareness Notice** - In respect of any Category 1 hazards and any Category 2 hazards on the property. This makes the owner and occupiers aware of the hazards identified however, it does not require remedial action. As a result, and because it does not secure risk reducing works within a specified timeframe, a Hazard Awareness Notice will not usually be the most appropriate course of action where remedial works are necessary to reduce the risk of harm to occupiers or potential occupiers.
- **Emergency Prohibition Order** – To immediately prohibit the use of all or part of a dwelling where there is an imminent risk of serious harm to the health or safety of the occupants or others.
- **Emergency Remedial Action** - Where there is a Category 1 hazard present, section 40 of the Housing Act 2004 allows the Council to undertake Emergency Remedial Action on the Category 1 hazard without prior notice.
- **Suspended Improvement/Prohibition Order** - The Council also has the power to suspend action taken under Part 1 Housing Act 2004 in situations where it has the power or duty to take enforcement action. This will be at the Council's discretion and will normally be considered for the purpose of minimising inconvenience to the current occupiers.
- **Demolition and Clearance** - Where the statutory criteria are met, the Council may consider action under Parts 9 and 10 of the Housing Act 2004 in respect of

dwellings that are unfit for human habitation or areas containing multiple such dwellings.

Non Compliance with Housing Act 2004

- Failure to comply with an Improvement Notice under section 30, or a Prohibition Order under section 32, of the Housing Act 2004 is a criminal offence. The Council may consider prosecution or the imposition of a civil financial penalty, having regard to the circumstances of the case and statutory guidance.

Other formal notices served by the Council may not relate to the landlord undertaking remedial works but may cover a range of other matters including, but not limited to, exercising a right of entry under section 239 of the Housing Act 2004 and a request to provide information or the need to abate or avoid overcrowding.

12.3.2 Renters Rights Act 2025

The Council has specific statutory duties to enforce landlord obligations and tenant protection provisions introduced by the Renters Rights Act 2025. In exercising its functions under the Renters Rights Act 2025, the Council may investigate and take enforcement action in relation to breaches of the landlord legislation, including (but not limited to): -

- Failures to comply with prescribed tenancy requirements
- Unlawful eviction and harassment offences
- Attempts to end tenancies otherwise than in accordance with the prescribed statutory process
- Misuse or abuse of possession grounds
- Failures to provide required information to tenants
- Breaches of restrictions on reletting, remarketing or rent practices
- Unlawful discrimination against prospective tenants in breach of the Renters Rights Act 2025. The Council recognises that other forms of discrimination in the letting process may arise under separate legislative frameworks. These are addressed elsewhere in this policy.

Enforcement action under the Renters Rights Act 2025 may include the service of statutory Notices, the requirement to provide information, the imposition of civil financial penalties, prosecution, applications for rent repayment orders, or other regulatory action permitted by law. Enforcement under the Renters' Rights Act 2025 is primarily offence-based and may be addressed through civil penalties, prosecution and other statutory remedies rather than through prescriptive notice regimes.

In determining the most appropriate enforcement response, the Council will have regard to the circumstances of the case, including the seriousness of the breach, the

impact on the tenant, any evidence of deliberate, reckless or repeated non-compliance, and the need to protect tenants from unfair or unlawful practices.

12.3.3 Right to Rent Avoidance of Discrimination

The Council recognises the requirements placed on landlords under the Immigration Act 2014 and associated secondary legislation in relation to Right to Rent checks. Section 23 of the Act provides for a Code of Practice issued by the Home Office to ensure that such checks are carried out without unlawful discrimination.

Enforcement of immigration legislation does not fall within the remit of the Council's Private Sector Housing functions. However, the Council recognises that discriminatory letting practices may impact access to accommodation and contribute to housing need. Where such practices are identified, the Council may: -

- provide advice and guidance to landlords on lawful letting practices
- signpost to relevant statutory codes of practice
- consider whether wider housing enforcement powers are engaged
- work with partner agencies where appropriate.

12.4 Other Housing and Public Health and Environmental Legislation

12.4.1 Environmental Protection Act 1990

Under the Section 79 to 80 of the Environmental Protection Act 1990, the Council has powers to take enforcement action in relation to statutory nuisances, including conditions that are prejudicial to health or constitute a nuisance.

Where a statutory nuisance is identified, or is likely to occur, the Council may serve an Abatement Notice requiring the nuisance to be discontinued, restricted or prevented, or requiring works to be carried out. Failure to comply with an Abatement Notice is a criminal offence and may result in prosecution or further enforcement action, including works in default where appropriate.

12.4.2 Prevention of Damage by Pests Act 1949

Under section 4 of the Prevention of Damage by Pests Act 1949, the Council has powers to require owners or occupiers of land or premises to take steps to prevent or eradicate infestations of rats or mice.

Enforcement action may include the service of statutory notices requiring treatment or works to be carried out, monitoring compliance, and the carrying out of works in default where necessary. Failure to comply with a notice may lead to prosecution and/or the recovery of costs incurred by the Council.

12.4.3 Building Act 1984

Under the Building Act 1984, the Council may take enforcement action in connection with those building-related functions delegated to it under the Act, where statutory conditions are met. This may include action in respect of buildings or land presenting risks to persons or property, or where works are required to address defective conditions within the Council's remit.

Formal enforcement action may include the service of statutory notices requiring remedial works to be carried out, the taking of emergency action where there is an imminent risk of serious harm, or the carrying out of works in default, in accordance with the provisions of the Act. Any enforcement action will be taken only where authorised by law and where other regulatory powers are not more appropriate.

12.4.4 Caravan Sites and Control of Development Act 1960 & Mobile Homes Act 2013

In relation to licensed residential caravan sites and protected mobile home sites, the Council has enforcement powers under the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013.

Formal enforcement action may be taken where a site is operating without a licence, site licence conditions are not complied with, where site management standards are deficient, or where offences are identified. Enforcement action may include the service of statutory or compliance notices, emergency action where permitted, the carrying out of works in default, and the prosecution of offences in accordance with the relevant legislation.

12.4.5 Empty Properties

The Council will take a proactive and risk-based approach to the identification and management of empty private residential properties, recognising the impact that long-term vacant dwellings can have on housing supply, neighbourhood amenity and community wellbeing.

Where empty or unoccupied properties give rise to housing hazards, statutory nuisances, anti-social behaviour or other breaches of housing-related legislation, the Council may take proportionate enforcement action using the relevant statutory powers available to it.

The Council's approach to empty properties is supported by its adopted Empty Homes Strategy 2026, which sets out the Council's wider objectives, priorities and non-statutory interventions for bringing empty homes back into use. This Enforcement

Policy provides the framework through which statutory enforcement and regulatory powers may be exercised, where appropriate, to support the delivery of those objectives.

The Council will seek, in the first instance, to work with owners to bring empty properties back into use through advice, engagement and voluntary measures. However, where voluntary action is not achieved, the Council may consider proportionate enforcement action in accordance with this policy and the relevant statutory framework.

Enforcement options may include: -

- service of statutory notices to address housing hazards, statutory nuisances, waste accumulation or defective conditions;
- action to secure properties where they present a risk to public safety;
- carrying out works in default where required works are not undertaken;
- recovery of costs incurred by the Council, including through local land charges; and
- consideration of enforced sale procedures where debts are secured against a property.
- Consideration of compulsory purchase orders

Where statutory criteria are met, the Council may also consider the use of Interim or Final Empty Dwelling Management Orders under Part 4 of the Housing Act 2004, or compulsory purchase powers, in accordance with adopted policies, corporate governance arrangements and decision-making procedures. The Council will prioritise long-term empty properties that have a significant adverse effect on the local community and may adopt a coordinated approach involving internal services and external partners to support their return to occupation.

12.4.6 Electrical safety / smoke and carbon monoxide / energy efficiency

The Council may take enforcement action to secure compliance with statutory private rented sector safety and energy efficiency requirements. This includes duties relating to electrical safety standards, smoke and carbon monoxide alarms, and minimum energy efficiency standards.

In relation to energy efficiency, the Council enforces the Minimum Energy Efficiency Standards under the *Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (as amended)*. Where landlords fail to comply with the prescribed minimum energy efficiency standard or other regulatory requirements, the Council may take enforcement action, which may include the service of compliance notices, the requirement to provide information, and the imposition of civil financial penalties.

Enforcement of electrical safety requirements and smoke and carbon monoxide alarm standards may also include the service of statutory notices and the imposition of civil financial penalties in accordance with the relevant regulations. Further detail on the Council's approach, including statutory statements of principles for determining penalties, is set out in Appendix 2 and Appendix 3.

12.4.7 HMO licensing and management

The Council may take enforcement action to secure compliance with Houses in Multiple Occupation (HMO) licensing requirements, licence conditions and management standards, including the imposition of civil financial penalties or prosecution where appropriate. Enforcement action may include the service and enforcement of licence conditions and requirements imposed under the Housing Act 2004 and associated Management Regulations.

HMO licences may include conditions requiring works to be carried out or measures to be taken to meet prescribed standards, including compliance with the Management of Houses in Multiple Occupation (England) Regulations. In general, the Council will seek to address Category 1 and Category 2 hazards through the exercise of its powers under Part 1 of the Housing Act 2004. This does not prevent the Council from imposing licence conditions relating to the provision, installation or maintenance of facilities or equipment, even where similar outcomes could be achieved through Part 1 enforcement.

Failure to comply with HMO licence conditions or management requirements is a criminal offence and may result in prosecution or the imposition of a civil financial penalty, having regard to the circumstances of the case and relevant statutory guidance.

The Council has adopted local amenity standards for HMOs, published as "Amenity Standards", which set out minimum requirements for facilities and space. Compliance with these standards forms a condition of all HMO licences issued within the District.

12.4.8 Illegal eviction and harassment

The Council will investigate and take enforcement action in relation to illegal eviction and harassment offences, including offences under the Protection from Eviction Act 1977 and related tenant-protection provisions. Such action will be taken in accordance with the applicable evidential tests and public interest considerations.

Enforcement action may include the imposition of civil financial penalties, prosecution, or other regulatory action permitted by law, including enforcement of relevant duties and offences introduced by the Renters' Rights Act 2025. In determining the

appropriate response, the Council will have regard to the seriousness of the conduct, the impact on the occupier, and the need to protect tenants from unlawful interference with their occupation of residential premises.

12.4.9 Traveller Incursions on Local Authority Land

This section sets out the Council's approach to unauthorised encampments on land it owns or manages. In dealing with unauthorised encampments, the Council is acting primarily in its capacity as a landowner rather than as a housing regulator.

Where an unauthorised encampment occurs on Bromsgrove District Council land, the Council will adopt a lawful, proportionate and case-specific approach. In determining the appropriate response, the Council will have regard to all relevant circumstances, including:

- the location, use and characteristics of the land occupied;
- any risks to health, safety or public amenity;
- the presence of children, elderly persons or individuals with health, welfare or support needs;
- any evidence of criminal activity, significant disruption or environmental harm; and
- the availability of alternative authorised sites or appropriate support.

The Council recognises the need to balance the rights and welfare of individuals occupying land without authorisation with the rights of the wider community and its responsibilities to protect public land, public safety and amenity. When considering any action in relation to unauthorised encampments, the Council will have due regard to its duties under the Equality Act 2010 and the Human Rights Act 1998.

Where appropriate, and having considered all relevant circumstances, the Council may take enforcement action as a landowner. This may include, but is not limited to:

- seeking possession of land through civil proceedings;
- the service of notices or the taking of action under relevant housing, public health or environmental legislation where statutory criteria are met;
- the recovery of costs associated with enforcement or remediation, where lawful to do so; and
- working with the Police or other agencies where statutory thresholds for involvement are met.

Matters relating to unauthorised encampments will normally involve joint working with partner agencies, which may include the Police, Legal Services, Housing, Environmental Health, Public Health and safeguarding services. Where welfare needs

or safeguarding concerns are identified, the Council will ensure that appropriate enquiries are made and that relevant support services are engaged before, or alongside, any enforcement action.

The Council retains discretion as to whether, and how, enforcement action is taken in relation to unauthorised encampments. Nothing in this policy creates a duty on the Council to take enforcement action in any particular case, nor does it confer any right on any person to require the Council to act. Any action taken will be proportionate, justified and recorded, with decisions made by authorised officers in accordance with the Council's governance arrangements.

13. Work in default

Where legislation permits, the Council may carry out works in default where a person has failed to comply with the requirements of a statutory notice or with licence conditions, or where urgent action is required and the relevant statutory criteria are met. Works in default may be undertaken under a range of legislative regimes, including housing, public health, environmental and site licensing legislation.

The carrying out of works in default is an enforcement option available to the Council in addition to other action for non-compliance, such as prosecution or the imposition of civil financial penalties. The Council is under no duty to undertake works in default and will do so only where it considers this necessary, appropriate and proportionate to secure compliance or to remove or reduce risks to health, safety or amenity.

Where works in default are undertaken, the Council will seek to recover its reasonable costs in accordance with the relevant statutory provisions. This may include the application of local land charges or other lawful cost-recovery mechanisms.

Decisions to carry out works in default will be taken by authorised officers having regard to the circumstances of the case, the seriousness of the breach, the risk posed, the availability of alternative enforcement options, and the Council's governance and financial procedures.

14. Enforcement Outcomes for Non-Compliance

14.1 Prosecution

Prosecution is a formal enforcement option available to the Council in respect of criminal offences under housing and related legislation. Where legislation provides an alternative of a civil financial penalty, the Council will normally consider prosecution only in more serious cases.

Prosecution will normally be considered where one or more of the following circumstances apply: -

- A breach has resulted in serious harm or risk of serious harm to occupants or others
- There is evidence of deliberate, reckless or persistent non-compliance
- There have been repeated breaches or a history of non-compliance
- There has been a failure to comply with a statutory notice
- False or misleading information has been provided to the Council
- An individual has obstructed officers in the course of their duties
- The offence is of such seriousness that a financial penalty would not be an appropriate response
- It is necessary to act as a deterrent and protect the wider community

The decision to prosecute will be made having regard to the evidential sufficiency of the case and the public interest factors set out in the Code for Crown Prosecutors, issued by the Director of Public Prosecutions. In determining whether prosecution is appropriate, the Council will consider the seriousness of the offence, any evidence of deliberate or reckless conduct, the harm caused, and the deterrent effect of formal legal proceedings.

In circumstances where an offence has been committed by a corporate body, relevant legislation may permit enforcement action to be taken against company officers or, where applicable, company members, in addition to or instead of the corporate body itself. The Council will determine, on a case-by-case basis, whether enforcement action against individuals is appropriate, having regard to their level of responsibility and involvement in the offence. The Council may, where appropriate following conviction, consider the use of confiscation proceedings under the Proceeds of Crime Act 2002 to recover financial benefit obtained as a result of criminal conduct.

14.2 Civil Financial Penalties for specified offences

The Council may impose civil financial penalties where legislation provides an alternative to prosecution. Civil penalties will be imposed in accordance with statutory guidance and this policy.

If a landlord has committed multiple breaches or offences, a separate civil penalty can, and usually will, be imposed for each breach and offence. In each case, the level of any civil penalty imposed will be determined in accordance with this policy. If multiple landlords have committed the same breach or offence at the same property, a separate civil penalty can, and usually will, be imposed on each offender. In each case, the level of civil penalty imposed on each offender will be in accordance with this policy.

This section of the policy outlines the Council's methodology and mechanism for assessing and setting the level of a civil penalty at all stages where a civil penalty is

under consideration, including the preparation of a notice of intent, and where a final decision has been made to impose a civil penalty.

When applying the civil penalties matrix, interim calculations at individual stages may result in figures that exceed the statutory maximum. Where the final amount reached following application of all relevant steps exceeds the statutory maximum, the civil penalty will be reduced to the applicable statutory maximum.

The Council considers the need for transparency and consistency to be of primary importance to ensure fairness in the discharge of its functions. The general objective of this policy is, therefore, to promote both transparency and consistency in the imposition of financial penalties so that those involved in the letting or management of accommodation

- (a) know how the Council will generally penalise relevant breaches and offences and;
- (b) are assured that, generally, like cases will be penalised similarly, and different cases penalised differently.

The Council recognises that, despite its best efforts, landlords may operate unlawfully for a significant period without detection, and that only a proportion of those committing relevant breaches and offences will be identified. Accordingly, the Council seeks to ensure that civil penalties are set at a level that makes it clear to the landlord concerned and to others that operating unlawfully as a landlord is financially disadvantageous when compared to operating lawfully.

The Council has a duty to act fairly, transparently and consistently when assessing civil penalties. To maintain fairness between all landlords, the Council will not give weight to claims advanced as factors that might reduce the amount of a civil penalty unless those claims are supported by evidence that the Council reasonably considers to be relevant, reliable, credible, and sufficient in scope and detail to enable proper assessment of the claim, having regard to the nature of the claim, the information ordinarily available to the landlord, and the need for consistent and fair decision-making. Allowing inadequately evidenced assertions to influence outcomes would risk rewarding those who provide incomplete or misleading information and would create an unfair advantage over landlords who provide a full and properly evidenced account.

Accordingly, the Council expects landlords against whom a civil penalty is being considered to provide all documents and records that would ordinarily exist if their account were accurate. Where such evidence is not provided, and no explanation that the Council considers adequate is given, the Council may draw an adverse inference.

Where claims are advanced without sufficient supporting evidence, the Council may request specified supporting material before determining whether to issue a final

notice or whether any mitigation has been sufficiently evidenced so as to justify a lower civil penalty. The Council has the power to impose a Civil Financial Penalty for the following: -

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1977
- Failure to comply with an Improvement Notice [s30 Housing Act 2004]
- Offences in relation to licensing of Houses in Multiple Occupation (HMOs) [s72 Housing Act 2004]
- Offences in relation to the Selective Licensing of 'houses' [s95 Housing Act 2004]
- Failure to comply with an Overcrowding Notice [s139 Housing Act 2004]
- Failure to comply with a management regulation in respect of an HMO [s234 Housing Act 2004]
- Offences in relation to Regulation 3 of the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- Failure to comply with a banning order [s21 Housing and Planning Act 2016]
- Failure to give a written statement of terms under section 16D of the Housing Act 1988
- Failure to give an existing tenant information about changes made by the Renters' Rights Act under paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025
- Attempting to let a property for a fixed term under section 16E of the Housing Act 1988
- Attempting to end a tenancy orally or by service of a notice to quit under section 16E of the Housing Act 1988
- Serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under section 16E of the Housing Act 1988
- Relying on a ground where the person does not reasonably believe that the landlord is/will be able to obtain possession under section 16E of the Housing Act 1988
- Relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would under section 16J of the Housing Act 1988
- Failing to provide a tenant with prior notice that a ground which requires it may be used under section 16E of the Housing Act 1988
- Reletting or remarketing a property before expiry of the 12 month no-let period after using the moving and selling grounds under sections 16E and 16J of the Housing Act 1988
- Discriminating against prospective tenants during the letting process on the grounds that those tenants are in receipt of benefits or have children under sections 33 and 34 of the Renters Rights Act 2025

- Marketing a letting without stating the proposed rent under section 56 of the Renters Rights Act 2025
- Inviting or encouraging any person to offer to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters Rights Act 2025
- Accepting an offer from any person to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters Rights Act 2025

The Government has issued statutory guidance entitled “Civil penalties under the Renters' Rights Act 2025 and other housing legislation”. The Council has regard to this guidance in the exercise of their functions in respect of civil penalties. The Council has considered the following factors in developing this civil penalty policy to help ensure that the civil penalty is set at an appropriate level.

14.1 Persons Liable for Civil Penalties

Civil financial penalties may be imposed on any person who has committed a relevant breach or offence under the legislation outlined in this policy. In determining who is liable, the Council will consider the available evidence and identify the person or persons responsible for the breach or offence. Liability will be determined on a case-by-case basis and may include landlords, agents, licence holders, or other persons involved in the letting or management of residential accommodation. The following table provides a general guide to responsibility for common breaches and offences: -

Summary of Offence Responsibilities

Breach or Offence	Person(s) Liable
Rent to Rent arrangements	Landlord and/or superior landlord
Illegal eviction and harassment	Any person who has committed the offence
Assured tenancy duties (Renters Rights Act 2025)	Landlord or person acting on their behalf
Discrimination in breach of the Renters Rights Act 2025	Landlord or person acting on their behalf
Unlicensed HMOs	Person having control and/or person managing (section 263 Housing Act 2004)
Overcrowded HMOs	Person having control and/or person managing
Breach of HMO licence conditions	Licence holder
Breach of HMO Management Regulations	Person having control and/or person managing
Failure to comply with a statutory notice	Person on whom the notice was served
Smoke and Carbon Monoxide Regulations	Relevant landlord

Electrical Safety Regulations	Private landlord or registered provider

The table above is intended as a general guide only. The Council will determine liability based on the specific facts of each case. Where a breach or offence is committed by a body corporate, and it is shown to have been committed with the consent, participation or neglect of an officer of that body, the Council may impose a civil penalty on that individual as well as, or instead of, the corporate body.

Where more than one person is liable for the same breach or offence, the Council may impose a civil penalty on more than one person. The amount imposed on each person may differ depending on the circumstances of the case.

Once the Council has identified the appropriate person or persons against whom enforcement action should be taken, it will determine the level of any civil financial penalty in accordance with statutory guidance and this Policy. In doing so, the Council will have regard to a range of factors such as: -

- **Severity of the breach or offence.** The more serious the breach or offence, the higher the penalty should be.
- **Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities.
- **The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the actual harm or the potential for harm, principally to the tenant but also potentially the local community, the higher the penalty should be.
- **Punishment of the offender.** The penalty should, in a way that is fair, both punish the offender and demonstrate the consequences of not complying with their responsibilities.
- **Deter the offender from repeating breaches or offences.** The ultimate goal is to prevent any further offending and help ensure that the offender fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a level that it is likely to have a very significant deterrent effect.
- **Deter others from committing similar breaches or offences.** While the fact that someone has received a civil penalty may not be in the public domain, the civil penalty policy itself will be and local authorities should consider how their formal enforcement activity can be effectively publicised. An important part of deterrence is the realisation on the part of landlords that the local housing authority is proactive in levying civil penalties where the need to do so exists and the civil penalty will be set at a high enough level such that operating lawfully will be the sensible financial choice.

- **Remove any financial benefit the offender may have obtained as a result of committing the breach or offence.** The principle here is that it should not be in the offender's financial interest to commit a breach or offence rather than comply, for example that the penalty for breaching licensing conditions in respect of occupancy of a property is less than the additional rent received as a result of the over-crowding. The absence of any financial benefit to the landlord does not mean though that the penalty should be reduced.

The factors set out above will be applied through the Council's civil penalties matrix to determine an appropriate starting point and any subsequent adjustments to the level of the penalty. The matrix provide a structured framework to promote consistency, but does not remove the Council's discretion to depart from starting points where justified by the particular circumstances of a case, subject to statutory limits and guidance. Once the level of the civil financial penalty has been determined, the Council will apply the relevant statutory process for imposing the penalty.

14.2.1 Statutory requirements for Imposing Civil Penalties

The table below sets out the statutory requirements applicable to different civil penalty regimes. It is intended as a general guide only. The Council will ensure that all enforcement action is taken in accordance with the specific statutory provisions applicable to each case, including any requirements relating to notices, representations, appeals and publication.

Legislation	Relevant Provision	Notice of Intent Required?	Publication / Transparency
Housing and Planning Act 2016	Civil penalties (including banning order breaches)	Yes – Notice of Intent must be served before imposing a civil penalty	Details may be recorded on the Rogue Landlord Database (where applicable)
Housing Act 2004	Civil penalties under s.249A	Yes – Notice of Intent required before imposing a civil penalty	Publication at the Council's discretion and/or on relevant databases
Protection from Eviction Act 1977	Illegal eviction and harassment (civil penalty alternative)	Yes – where a civil penalty is imposed instead of prosecution	Publication discretionary via Council reporting or enforcement transparency
Renters' Rights Act 2025	Civil penalty provisions	Yes – Notice of Intent required	Publication may include national PRS database and Council

			transparency reporting
Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015	Regulations 33–42	No – Compliance Notice issued first	Publication on PRS Exemptions Register
Electrical Safety Standards Regulations 2020	Regulations 3–11	Yes – following Remedial Notice	Publication discretionary
Smoke and Carbon Monoxide Alarm Regulations 2015	Regulations 5–8	No – Remedial Notice precedes penalty	Statement of Principles must be published
Consumer Rights Act 2015	Letting agent transparency	Yes	No statutory publication requirement

14.2.2 Civil Penalties Matrix

In determining the level of a civil penalty, officers will have regard to the matrix set out in Appendix 1 and the following sequential steps: -

1. Determining the starting point based on the seriousness of the breach or offence.
2. Adjustment for factors relating to the type of landlord; size and type of portfolio controlled, owned or managed; experience of the landlord (“Landlord Type”)
3. Mitigating and aggravating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants.
4. Financial considerations.
5. Applying the totality principle.

Where legislation requires the Council to publish a separate statement of principles for determining penalty charges, including the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended) and the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015, the offence-specific factors and starting points set out in the relevant appendix will apply in place of those in Appendix 1. In all other respects, the methodology set out in this policy, including landlord-type adjustments, financial consideration and the totality principle, will continue to apply.

Where a civil financial penalty is imposed in respect of an offence under section 234(3) of the Housing Act 2004 (failure to comply with HMO Management Regulations), or section 72(3) of the Housing Act 2004 (breach of licence conditions), the offence-specific duties, factors and starting points set out in Appendix 1 will apply. The Council will determine whether a separate civil penalty is appropriate for each

breached regulation or licence condition having regard to the facts of the case, statutory guidance, and the totality principle.

Starting point based of seriousness of the breach or offence

The Ministry of Housing, Communities & Local Government has provided statutory guidance that prescribes starting points for all breaches and offences based on the seriousness of the breach or offence. Where the Council has determined its own starting points for specific offences, including breaches of licence conditions under sections 72(3) and 95(2) of the Housing Act 2004, these are set out in the relevant matrices appended to this policy.

Adjustment for factors relating to the type of landlord; size and type of portfolio controlled, owned or managed; experience of the landlord (“Landlord Type”)

While all landlords are expected to comply fully with their legal obligations, the Council considers that a higher standard of professionalism and regulatory awareness is reasonably expected of landlords who operate at greater scale, who have greater experience, or who are involved in more complex forms of letting. Where such landlords fail to comply with their obligations, this will ordinarily justify a higher civil penalty. In particular, a higher degree of professionalism is expected of landlords who:

- Control, own, or manage a significant portfolio of properties
- Have significant experience in the letting or management of property
- Are or have been involved in the letting or management of Houses in Multiple Occupation (HMOs)
- Are corporate landlords, or
- Are or have been directors of corporate landlords

An upward adjustment of 20% of the applicable starting point will be applied where the landlord meets any one or more of the following criteria: -

- The landlord has, at any point in time, controlled, owned, or managed six or more properties. These properties need not have been held concurrently or at the time civil penalty proceedings are brought
- The landlord has, at any point in time, controlled, owned, or managed three or more properties that operated as HMOs, whether or not concurrently
- The landlord is, or has previously been, a director of a corporate landlord
- The landlord is a corporate landlord
- The landlord has, in the Council’s assessment and by reference to the available evidence, significant experience in the letting or management of property.

A downward adjustment of 20% of the applicable starting point will be applied only where all of the following criteria are met: -

- The landlord has, at any point in time, controlled, owned, or managed no more than two properties
- The landlord has controlled, owned, or managed no more than one property that has operated as an HMO, at any point in time
- The landlord has, in the Council's assessment and by reference to the available evidence, very limited experience in the letting or management of property

Mitigating and aggravating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants

To promote fairness and consistency in the administration of civil penalties, the Council will apply a structured and consistent framework when determining the extent to which mitigating and aggravating factors affect the quantum of any civil penalty.

14.2.2 General approach

Each breach or offence may have offence-specific mitigating and/or aggravating factors, which will be considered alongside the generic factors set out below. Where multiple civil penalties are issued under this policy against the same landlord at the same time, and except where expressly stated otherwise, mitigating and aggravating factors will be considered and applied separately to each civil penalty when determining the quantum of each penalty.

Mitigating factors

The Council may reduce the level of a civil penalty by up to 20% of the applicable starting point to reflect the presence of mitigating factors. Only in exceptional circumstances may the Council depart from the application of this policy in respect of mitigating factors and apply a reduction in excess of 20%. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors.

Within the framework of this policy, the Council has not sought to provide an exhaustive list of mitigating factors, recognising that a wide range of circumstances may potentially give rise to mitigation. However, the following generic mitigating factors will be considered in respect of each breach or offence: -

Steps taken to remedy the basis of the breach or offence

Non-exhaustive examples include: -

- Promptly remedying all elements of the breach or offence after receiving communication from the Council.

- Promptly remedying all the significant elements of the breach or offence leaving only less significant elements of the breach or offence.

A high level of cooperation

Non-exhaustive examples include:

- Proactive provision of significant information the Council reasonably considers relevant beyond that required by statutory notice.

Acceptance of liability

Non-exhaustive examples include: -

- Accepting liability before or within the period for representations.

Where a landlord relies on a reasonable excuse defence or otherwise contests liability, this mitigating factor will not usually apply.

Health circumstances

Non-exhaustive examples include:

- A serious health condition or medical incident experienced by the landlord during, or in the period immediately preceding, the breach or offence, where there is clear and reliable evidence that the condition had a direct and material impact on the landlord's ability to comply with the relevant legal obligation. Examples may include, but are not limited to, a heart attack, stroke, cancer diagnosis, or other acute or serious medical event causing significant incapacity or impairment.

Diminished culpability (limited responsibility)

Non-exhaustive examples include: -

- A joint landlord who has evidenced that compliance arrangements for the subject property were directed and controlled by another joint landlord, and not by them.
- A landlord who became involved only after an unforeseen change in circumstances (such as the death of the previous landlord) and who committed the breach or offence only for a limited period while putting their affairs in order.

The instruction of a managing or letting agent, or reliance on an agent's actions or omissions, will not of itself constitute diminished culpability.

Aggravating factors

The Council may increase the level of a civil penalty by up to 20% of the applicable starting point to reflect the presence of aggravating factors. Only in exceptional

circumstances may the Council depart from the application of this policy in respect of aggravating factors and apply an increase in excess of 20%. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple aggravating factors. The following generic aggravating factors will be considered in respect of each breach or offence: -

Previous history of non-compliance.

Non-exhaustive examples include: -

- Previous successful prosecutions (including relevant spent convictions), previous civil penalties, previous rent repayment orders, previous works in default, previous simple cautions.

Concurrent investigations or proceedings relating to other civil penalties, prosecutions, or rent repayment orders will not be treated as previous non-compliance.

Non-cooperation with the Council.

Non-exhaustive examples include: -

- Failure to comply with notices issued under section 16 of the Local Government (Miscellaneous Provisions) Act 1976, section 235 of the Housing Act 2004, or section 114 of the Renters Rights Act 2025.
- Failing to provide a substantive response to a letter of alleged offence.
- Failing to attend previously agreed meetings.

Where the Council considers that steps have been taken to avoid payment or enforcement (including asset transfer, company dissolution, or re-structuring), this may be treated as an aggravating factor and pursued through appropriate legal routes. Where the Council has prosecuted, or is pursuing a prosecution, in respect of the same act or omission involving failure to provide legally required information (including failure to comply with a statutory notice), that conduct will not also be treated as an aggravating factor for the purposes of setting the civil penalty, in order to avoid double counting. Where multiple civil penalties are imposed against the same landlord at the same time, this aggravating factor will be applied only to the civil penalty with the highest starting point, unless there is a clear and reasoned basis for applying it differently.

Deliberate intent or negligence when committing the offence.

Non-exhaustive examples include: -

- Knowledge that the breach or offence was occurring.
- Continuation of offending after communication from the Council.
- Premeditation or planning, including steps taken to prevent detection or effective investigation.

- Providing false or misleading information to the Council.
- Applying pressure to occupants to deter cooperation with the Council.

The number of occupants affected.

Non-exhaustive examples include: -

- 3-5 occupants affected.

Duration of non-compliance.

Non-exhaustive examples include: -

- The offence or breach occurred over a 3–6 month period.

Vulnerability of occupants

Non-exhaustive examples include children and young adults, persons vulnerable by reason of age, disability or sensory impairment, persons with drug or alcohol dependency, victims of domestic abuse, children in care, persons with complex health needs, persons who do not speak English as a first language, victims of trafficking or sexual exploitation, refugees, asylum seekers, and pregnant women.

14.2.3 Financial considerations

The Council will review the quantum of the civil penalty and consider whether it is sufficient to act as an effective deterrent to future non-compliance. Where the Council has evidence that it considers to be sufficiently reliable regarding rental income and/or asset value from the landlord's, it may determine that an increase in the level of the penalty is appropriate in order to achieve effective deterrence. It is essential that, as an absolute minimum, landlords do not financially benefit from their offending behaviour.

Financial circumstances will ordinarily be considered after any written representations have been received and as part of the determination of any final notice. Where a landlord seeks to rely on a strained or limited financial position as a basis for reducing the level of a civil penalty, that position must be supported by appropriate and verifiable evidence sufficient to enable the Council to assess the landlord's financial position consistently, objectively, and transparently. A distinction will be drawn between evidenced financial hardship and deliberate or strategic non-payment. A claimed inability to pay will not prevent enforcement or recovery action where the Council is satisfied that non-payment is avoidable or part of a pattern of non-compliance.

Unsupported assertions, partial disclosure, or selective provision of information will not be given weight. At a minimum, and where such information exists, the following should be provided as part of any written representations: -

- The last three full tax years full self-assessment tax returns filed with HMRC, including all additional and supplemental pages
- The last three full tax years SA302 documents & tax year overviews
- The last three months payslips
- The last three years P60 certificates
- The last twelve months Universal Credit payment statements
- A list of all property assets owned or jointly owned (not limited to rental properties), together with corresponding Land Registry title documents
- A list of all property assets owned, or held on a long lease, by any corporate entity in which the landlord has a beneficial interest, together with corresponding Land Registry documentation
- The most recent annual mortgage statement for each property, or the last twelve months mortgage statements where the mortgage has been in place for less than twelve months
- Valuation statements for all ISAs held
- Statements from any cryptoasset exchange accounts showing balances and valuations
- A list of all shareholdings
- Recent bank statements for any account holding a balance in excess of £5,000
- Recent statements for all secured and unsecured loans
- Bankruptcy orders and official notifications of bankruptcy

Where the Council is not satisfied that it has been provided with sufficiently reliable, complete, and accurate information to assess the landlord's financial position, the Council may draw the inference that the landlord is able to pay the civil penalty as imposed.

A claimed inability to pay will not, of itself, outweigh the need to ensure effective deterrence or to remove any financial benefit obtained as a result of the breach or offence.

14.2.4 The Totality Principle

The Council will have regard to the totality principle to ensure that the overall outcome of its enforcement action is just and proportionate. In exceptional cases and having regard to the particular circumstances of the case, the Council may take account of totality at an earlier stage by deciding not to pursue a civil penalty in respect of a specific breach or offence where doing so would render the overall outcome disproportionate.

In general, however, the application of the totality principle will form the final step in the Council's decision-making process, undertaken after any written representations have been considered and before final notices are issued, once the level of each individual civil penalty has been assessed in accordance with this policy.

As a final step before issuing final notices, the Council will consider whether multiple civil penalties being imposed under this policy against the same landlord at the same time result in an aggregate amount that is just and proportionate. Where the Council concludes that the aggregate amount would not be just and proportionate, it will consider whether a proportionate reduction of the penalties is appropriate.

The totality principle does not operate across different legal persons who are separately liable in law, nor does it operate across civil penalties imposed at different times. In general, it applies only to multiple civil penalties imposed under this policy on the same person at the same time. Where, however, legislation provides that an officer of a body corporate, or a person concerned in its management, may be separately liable in relation to the same conduct as the body corporate, and that officer also holds a shareholding interest in the body corporate, the Council will, where civil penalties are imposed at the same time on both the body corporate and the officer arising from that same conduct, consider whether the combined outcome results in punitive duplication and is therefore not just and proportionate.

Where a reduction is applied under the totality principle, the Council will ordinarily do so by applying a uniform percentage reduction across all relevant civil penalties being issued at the same time, being those civil penalties that form part of the same totality assessment. Where, however, the application of the totality principle is required to address punitive duplication arising from a shared economic interest between a body corporate and an officer, the Council may apply a differential adjustment to ensure that the overall outcome is just and proportionate.

This approach reflects the statutory guidance on the application of the totality principle and is intended to promote consistency, transparency, and proportionality, while avoiding arbitrary or selective adjustment of individual penalties.

In accordance with the statutory guidance, any rent repayment orders made in respect of the same breach or offence will be disregarded for the purposes of assessing the totality of civil penalties under this policy.

14.2.5 Process for imposing a civil penalty and the right to make written representations

Notice of intent

Before imposing a civil penalty on a landlord, the Council will give the landlord a notice of intent. The notice of intent will set out: -

- The amount of the proposed civil penalty
- The reasons for proposing to impose the civil penalty
- Information about their right to make written representations

Right to make written representations

A landlord who is given a notice of intent may make written representations to the Council about the proposal to impose a civil penalty. Any representations must be made within a period of 28 days beginning with the day after the date on which the notice of intent was given.

Decision after the representations period

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

- Decide whether to impose a civil penalty on the landlord, and
- If it decides to impose a civil penalty, decide the amount of the penalty. This amount can be higher or lower than the amount stated in the notice of intent.

A landlord's rectification of the identified breach or offence during the representations period will rarely, of itself, lead the Council to conclude that the imposition of a civil penalty is inappropriate. However, compliance at that stage will usually be relevant to the assessment of mitigating factors that may reduce the level of any civil penalty imposed.

Similarly, an admission of liability will rarely, of itself, lead the Council to conclude that the imposition of a civil penalty is inappropriate. An admission of liability will, however, usually be relevant to the assessment of mitigating factors that may reduce the level of any civil penalty imposed.

Final notice

If, following the receipt of written representations and/or the expiry of the time period to make written representations, the Council decides to impose a civil penalty on the landlord, it will give the landlord a final notice imposing that penalty. The final notice will set out: -

- The amount of the civil penalty
- The reasons for imposing the penalty
- Information about how to pay the penalty
- Explain the consequences of non-payment and the Council's powers to recover unpaid civil financial penalties.

- The period for payment of the penalty
- Information about rights of appeal
- The consequences of failure to comply with the notice

Discount for prompt payment

Where a civil penalty imposed by a final notice is paid in full within the period specified in that notice (normally 28 days beginning with the day after the final notice is given), the Council will apply a discount of 15% to the amount of the civil penalty.

The availability of the discount is conditional upon full payment being received within the specified period. The discount period will not be extended or suspended by the bringing of an appeal. A landlord who chooses to appeal may still benefit from the discount by paying the civil penalty in full within the specified period; however, where payment is not made within that period, the discount will not apply. The application of any prompt payment discount will be subject to internal approval and financial governance procedures.

Illustrative example of the application of the discount

The landlord of an HMO property fails to obtain a licence. They only operate two HMO properties and there are no other relevant factors or aggravating features. The starting point for the offence under the Council's civil penalties matrix is £17,000.

Following the issue of a notice of intent proposing a civil penalty of £17,000, the landlord makes written representations. Having considered those representations, the Council determines to impose a civil penalty of £16,000, as set out in the final notice. If the landlord pays the civil penalty in full within the payment period specified in the final notice, a 15% prompt payment discount is applied, resulting in a discounted payment of £13,600.

Appeals

Where an appeal is brought, the final notice is suspended in accordance with legislation. Where no appeal is brought, payment remains due in accordance with the final notice and recovery action may commence after the payment period expires.

A landlord who is given a final notice may appeal to the First-tier Tribunal (Property Chamber) against the decision to impose a civil penalty and/or the amount of the civil penalty. Any appeal must be made within 28 days beginning with the day after the date on which the final notice was given. Where an appeal is brought, the final notice is suspended until the appeal is finally determined or withdrawn.

An appeal to the First-tier Tribunal is by way of a re-hearing of the Council's decision. In determining an appeal, the Tribunal may have regard to matters of which the Council

was unaware at the time the decision to impose the civil penalty was made. The Tribunal may dismiss an appeal if it is satisfied that the appeal is frivolous, vexatious, an abuse of process, or has no reasonable prospect of success.

The First-tier Tribunal may invite the parties to consider mediation or another form of alternative dispute resolution. The Council will not generally agree to mediation in relation to the level of a civil penalty, as civil penalties are determined by reference to this Policy to promote fair, consistent, and proportionate outcomes. Agreeing reductions outside the Policy framework would risk undermining consistency and the Council's enforcement objectives.

On determination of an appeal, the Tribunal may: -

- Confirm the civil penalty
- Vary the amount of the civil penalty (whether by increase or reduction)
- Cancel the civil penalty

Where the Tribunal varies a civil penalty by increasing its amount, it may do so only up to the applicable statutory maximum for the relevant breach or offence (£7,000 or £40,000, as applicable). A party to the appeal may apply for permission to appeal the decision of the First-tier Tribunal to the Upper Tribunal (Lands Chamber).

14.3 Rent Repayment Orders

Part 2 of the Housing and Planning Act 2016 permits the Council to seek a Rent Repayment Order at the First Tier Tribunal Property Chamber to require the landlord of the property where the offence(s) has been committed to refund rent to the tenants or the Council. S48 of the Housing and Planning Act 2016 places a duty on the Council to consider applying for Rent Repayment Orders.

Where a landlord has been convicted or received a Civil Financial Penalty in respect of the offence, the Tribunal must award the maximum applicable amount, except in exceptional circumstances.

This power will be considered in response to all qualifying offences and where there is sufficient evidence for a successful application to the First Tier Tribunal. The qualifying offences are: -

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1997
- Failure to comply with an Improvement Notice [s30 Housing Act 2004]
- Offences in relation to unlicensed HMOs [s72(1) Housing Act 2004]
- Offences in relation to unlicensed houses [s95(1) Housing Act 2004]
- Failure to comply with an Improvement Notice [s30(1) Housing Act 2004]

- Failure to comply with a Prohibition Order [s32(1) Housing Act 2004]
- Breach of a Banning Order [s21 Housing and Planning Act 2016]
- Using Violence to secure entry [s6(1) Criminal Law Act 1977]
- Knowingly or recklessly misusing a possession ground [s16J(1) Housing Act 1988]
- Letting or marketing of a property within twelve months of using the 'moving in' or 'selling' ground of eviction [s16J(2) Housing Act 1988]
- Continuous breach of certain tenancy reform requirements [s16J(3) Housing Act 1988]

An application for an RRO may be in addition to other formal action, such as prosecution proceedings or the imposition of a Civil Penalty. Where the Council has issued a Civil Financial Penalty or pursued prosecution, it will usually apply for a Rent Repayment Order where public funds have been paid to a landlord who has committed a qualifying offence.

S49 of the Housing and Planning Act 2016 enables the Council to assist tenants in applying for Rent Repayment Orders. The Council will usually assist tenants by referring or signposting them to a relevant organisation. An application for a Rent Repayment Order may be made in addition to, or alongside, other enforcement action where legislation permits.

14.4 Simple Cautions

A simple caution may be used as an alternative to prosecution in appropriate cases where: -

- there is sufficient evidence to provide a realistic prospect of conviction;
- the offender admits the offence; and
- the offender agrees to accept a caution.

Simple cautions will generally be considered where offences are less serious and where it is proportionate to do so, having regard to the circumstances of the case. A record of a simple caution may be taken into account in any future enforcement action. Where an offender declines to accept a simple caution, the Council will normally consider prosecution.

14.5 Banning Orders

Part 2, Chapter 2 of the Housing and Planning Act 2016 permits a Council to apply for a Banning Order against a person who has been convicted of one or more of the relevant offences. This would prevent the landlord from:

- Letting housing in England
- Engaging in English letting agency work

- Engaging in English property management work
- Doing two or more of those things

The Council may consider a Banning Order for the more serious offenders. It will take into account the seriousness of the offence(s), whether the landlord has committed other offences (or received any Civil Penalty in relation to a Banning Order offence) and any history of failing to comply with their obligations or legal responsibilities. It will also take into account other relevant factors, including but not limited to: -

- The harm, or potential harm, caused to the tenant
- The need to punish the offender
- The need to deter the offender from repeating the offence
- The need to deter others from committing similar offences

Persistent non-compliance, including failure to pay civil financial penalties or comply with enforcement outcomes, may form part of the evidence considered when determining whether an application for a banning order is appropriate.

15. Costs and Charges

The Council incurs costs in carrying out its functions. Where legislation allows, the Council will seek to recover reasonable costs and expenses associated with its enforcement, licensing and wider regulatory activity. This may include (non-exhaustively) costs arising from inspections, investigation, evidence gathering, notices and other statutory documentation, follow-up action, compliance monitoring, and works or other interventions. Further detail on the recovery of unpaid civil financial penalties is set out at section 16 of this policy.

Recovery may be pursued using all available lawful routes, which may include civil action, local land charges, and enforcement against the property. Where permitted by legislation, interest may be applied to outstanding sums until paid.

16. Recovery of Unpaid Civil Financial Penalties

Where a civil financial penalty remains unpaid following the expiry of the period for payment specified in the final notice, and where no appeal is outstanding, the penalty may be recovered by the Council as a civil debt. The Council will actively pursue the recovery of unpaid civil financial penalties where it is lawful, proportionate and appropriate to do so. Recovery action is an important element of ensuring effective enforcement and maintaining public confidence in the Council's regulatory role.

The method of recovery pursued in any individual case will be determined having regard to the value of the debt, the conduct of the debtor, any history of non-payment

or non-compliance, vulnerability considerations, and what is reasonable and proportionate in the circumstances.

16.1 Ways to Enforce the Debt

Potential routes to recover an unpaid civil financial penalty include (but are not limited to): -

- **Warrant or writ of control**
This authorises court enforcement agents to take control of goods from the debtor's home or business to satisfy the judgment debt.
- **Attachment of earnings order**
This allows deductions to be made directly from the debtor's earnings by their employer and paid to the Council.
- **Third party debt order**
This enables money held in a debtor's bank or building society account to be frozen and paid to the Council to satisfy the debt.
- **Charging order**
This secures the debt against an asset (usually a property), preventing its sale without payment of the outstanding amount and potentially enabling the Council to seek an order for sale.
- **Bankruptcy proceedings**
This may be pursued where the statutory threshold is met (currently £5,000), enabling a trustee-in-bankruptcy to realise assets and distribute funds to creditors in accordance with insolvency law.

16.2 Costs and Interest

Where permitted by law, the Council may seek to recover reasonable court fees, enforcement costs, and associated expenses incurred in the recovery of unpaid civil financial penalties. Interest may also be applied to outstanding sums until paid.

16.3 Relationship to Wider Enforcement Action

Failure to pay a civil financial penalty may be regarded as evidence of ongoing non-compliance and may be taken into account in future enforcement decisions, including but not limited to decisions to prosecute, to impose further civil penalties, to refuse or revoke licences, or to consider banning order proceedings where the statutory criteria are met.

16.4 Governance and Write-Off

Any decision not to pursue, or to discontinue, recovery action will be taken in accordance with the Council's financial regulations and governance arrangements and

will be properly recorded with reasons. Decisions to pursue enforcement beyond initial recovery action, or to commence insolvency proceedings, will be taken or endorsed by a senior officer in accordance with the Council's scheme of delegation.

17. Joint Working and Information Sharing

The Council recognises that effective regulation of the private rented sector requires a coordinated and multi-agency approach. Many cases involve overlapping issues, including housing conditions, tenancy rights, safeguarding, financial exploitation, and criminal behaviour. The Private Sector Housing Team will work in partnership with a range of internal and external agencies to ensure that risks to tenants are identified at the earliest opportunity and addressed through appropriate and proportionate intervention. The Council may work jointly with other agencies including (this list is not exhaustive): -

- Hereford and Worcester Fire and Rescue Service
- Police
- Planning and Building Control
- Worcestershire Regulatory Services
- Trading Standards
- Home Office
- Worcestershire County Council

17.1 Internal Collaboration

The Council will work closely across internal services to ensure a joined-up approach to prevention and enforcement, including: -

- Housing Options and Homelessness Services - To support early intervention, prevent homelessness, and ensure effective case handover where enforcement action may be required.
- Legal Services - To support the use of formal enforcement powers, including civil penalties, prosecutions, and injunctions.
- Customer Services and Revenues and Benefits - To support intelligence gathering, identify vulnerable households, and ensure coordinated responses to tenant concerns.

17.2 External Partnership Working

The Council will work collaboratively with external partners to address risks within the private rented sector, including:

- Police - In relation to criminal matters such as unlawful eviction, harassment, violence, or organised criminal activity.
- Fire and Rescue Authority -To address fire safety risks, including Houses in Multiple Occupation (HMOs), means of escape, and fire protection measures.
- Worcestershire Regulatory Services (WRS) - In relation to environmental protection, statutory nuisance, public health, and wider regulatory functions.

- Trading Standards -In relation to unfair trading practices, letting agent regulation, and financial or consumer protection issues affecting tenants.

17.3 Letting Agents and Property Agent Regulation

The Council recognises that the regulation of letting agents and property managers forms an important part of protecting tenants within the private rented sector. The legislative framework includes the Consumer Rights Act 2015, the Tenant Fees Act 2019, and associated requirements relating to client money protection and redress schemes. Enforcement responsibilities in this area are shared across regulatory services. The Private Sector Housing Team will identify potential breaches through inspections, complaints, and casework, and will work collaboratively with Trading Standards and other partners to ensure appropriate enforcement action is taken.

17.4 Coordinated Enforcement Approach

The Council will adopt a coordinated and intelligence-led approach to enforcement, including:

- sharing information lawfully between partners
- undertaking joint inspections where appropriate
- coordinating enforcement action across agencies
- ensuring clear referral pathways between services
- prioritising cases involving vulnerable households or serious risk.

This approach ensures that enforcement action is effective, proportionate, and targeted at the most serious and high-risk cases.

17.5 Safeguarding and Vulnerability

The Council recognises that many cases involve vulnerable individuals or households at risk of harm. Officers will work with safeguarding partners and relevant agencies to ensure that appropriate support is provided alongside any enforcement action. Joint working arrangements applied in relation to unauthorised encampments are addressed in Section 9.4.9 of this policy.

18. Monitoring of Enforcement Activity

The Council will monitor the use of its housing enforcement powers to ensure enforcement activity is lawful, proportionate, consistent and effective. Information may be recorded and reviewed relating to:

- Inspections and investigations undertaken
- Statutory notices served
- Civil financial penalties issued
- Prosecutions and legal proceedings
- Works in default undertaken
- Rent repayment orders and banning orders pursued

- Enforcement activity undertaken under the Renters Rights Act 2025, including any statutory reporting requirements or Government data returns.
- Recovery action taken in respect of unpaid civil financial penalties, including outcomes and sums recovered.

This information will be used to: -

- Review enforcement practices
- Identify emerging risks within the private rented sector
- Inform future housing policy and regulatory activity
- Ensure consistency and fairness in enforcement decisions.

Summary information may be reported through internal governance processes or published, where appropriate and in accordance with transparency requirements. The Council may publish anonymised or summary information relating to enforcement activity, including civil penalties imposed and recovery outcomes, where lawful and appropriate.

19. Communication and Training

This Policy will be made publicly available and will be communicated to relevant stakeholders. The Council will: -

- ensure that authorised officers receive appropriate training in housing enforcement and relevant legislation;
- provide internal guidance, procedures and templates to support consistent application of this Policy; and
- engage with landlords, agents and partner organisations where appropriate to promote compliance and awareness of legal requirements.

20. Complaints

Contact may be made with the Council about any matters listed here by email at pshteam@bromsgroveandredditch.gov.uk or by post at: -Bromsgrove District Council, Parkside, Market Street, Bromsgrove, Worcestershire, B61 8DA

A service user can still make a complaint in cases where the Council has instigated legal proceedings. However, making a complaint will not stop any impending legal action. Where statutory notices have been served, making a complaint does not replace the statutory rights of appeal or the right to make representations. It also does not allow extra time to comply with any notice or order. If a service user disagrees with a statutory notice, they should take action as specified in the notice or order to make an appeal, if any exists. Reference should be made to any notes that may accompany the notice or order for more detail.

21. Policy Review

This policy will normally be reviewed every five years, or sooner where there are significant legislative, regulatory or operational changes.

Version Control

Title		Enforcement and Civil Penalties Policy		
Description		Private Sector Housing Policy		
Created by		Miss Katie Sharp-Fisher Private Sector Housing Manager		
Date created		June 2026		
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Version number	Modified by	Modifications made	Date modified	Status

Appendix 1 – Civil Penalties Tables

1. Purpose of this Appendix

This appendix provides an indicative framework to support the Council in determining the level of civil penalty for relevant housing offences under:

- Housing Act 2004
- Housing Act 1988
- Protection from Eviction Act 1977
- Housing and Planning Act 2016
- Renters' Rights Act 2025
- Electrical Safety Regulations

This matrix must be applied alongside the main Enforcement Policy, including the Council's approach to:

- culpability
- harm
- proportionality
- deterrence

2. Landlord Adjustment (Applied Across All Offences)

The ranges within this table reflect indicative adjustments: -

- **Downward adjustment (up to –20%)** may apply where:
 - First offence
 - Small-scale landlord
 - Evidence of cooperation or engagement
- **Upward adjustment (up to +20%)** may apply where:
 - Portfolio or professional landlord
 - Previous enforcement history
 - Deliberate or reckless conduct

Officers must exercise discretion. The figures shown are indicative and must not be applied mechanistically.

3. General Principles

- "No specific factors identified" means no additional factors beyond the Council's standard policy framework apply
- Where multiple offences arise, penalties may be considered individually or in combination
- Where offences are particularly serious, the Council may consider prosecution as an alternative to a civil penalty

Matrix Tables

1. Protection from Eviction Act 1977

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Unlawful eviction and harassment of occupier - section 1 of the Protection from Eviction Act 1977	£35,000	£40,000	£28,000	£42,000	No specific factors identified.	- Violence or threats of violence. - Disposal of possessions or threats to dispose of possessions. - Breach or evasion of an injunction or undertaking. - Loss of home.

2. Housing Act 1988 breaches and offences

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to give a written statement of terms and any other prescribed information - section 16D of the Housing Act 1988	£4,000	£7,000	£3,200	£4,800	Provision of some of the required terms and prescribed information within the required period.	No specific factors identified
Attempting to let a property for a fixed term - section 16E(1)(a) of the Housing Act 1988	£4,000	£7,000	£3,200	£4,800	No specific factors identified.	No specific factors identified beyond the standard policy framework.
Attempting to end a tenancy by service of a notice to quit - section 16E(1)(b) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified.	Tenant vacates property within four months of the date of vacation or equivalent specified in the notice to quit.
Attempting to end a tenancy orally or requiring that it is ended orally - section 16E(1)(c) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified.	Tenant vacates property within four months of the date of vacation or equivalent specified in the notice to quit.
Serving a possession notice that attempts to end a tenancy outside the prescribed section 8 process - section 16E(1)(d) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified	Tenant vacates property within four months of the date of vacation or equivalent specified in the notice to quit.

Relying on a ground where the person does not reasonably believe that the landlord is, will, or may be able to obtain possession on that ground and the tenant(s) surrendered the tenancy within the period of four months beginning with the date of the contravention, without an order for possession of the dwelling-house being made - section 16E(1)(e) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified	No specific factors identified
Failing to provide a tenant with prior notice that a ground which requires it may be used - section 16E(1)(f) of the Housing Act 1988	£3,000	£7,000	£2,400	£3,600	No specific factors identified.	No specific factors identified
Failure to give an existing tenant prescribed information about changes made by the Renters' Rights Act 2025 in the prescribed form and timeframe - paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025	£4,000	£7,000	£3,200	£4,800	Provision of some of the required prescribed information within the required period. Provision of prescribed information but not in the prescribed form.	No specific factors identified
Continuation of conduct subject to a relevant penalty (under s.16I or s.16K Housing Act 1988) after the 28-day period (or, if appealed, after conclusion of the appeal) where the final notice has not been withdrawn — section 16J(3) of the Housing Act 1988	Double the starting level for the two constituent breaches added together	£40,000	Dependent on the constituent breaches	Dependent on the constituent breaches	No specific factors identified.	No specific factors identified
Conduct giving rise to liability under s.16I, where within the preceding five years the person has either (i) had a relevant penalty (under s.16I or s.16K Housing Act 1988) imposed for different conduct and the final notice has not been withdrawn, or (ii) been convicted under s.16J for different conduct – section 16(J)(4) of the Housing Act 1988	Double the starting level for the two constituent breaches added together	£40,000	Dependent on the constituent breaches	Dependent on the constituent breaches	Dependent on the most recent conduct giving rise to liability to a civil penalty under section 16I of the Housing Act 1988.	Dependent on the most recent conduct giving rise to liability to a civil penalty under section 16I of the Housing Act 1988.
Relying on a ground where the person knows that the landlord would not be able to obtain an order for possession on that ground, or being reckless as to whether the landlord would be able to do so and the tenant(s) surrendered the tenancy within the period of four months beginning with the	£30,000	£40,000	£24,000	£36,000	No specific factors identified	No specific factors identified

date the ground was relied on, without an order for possession of the dwelling-house being made – section 16J(1) of the Housing Act 1988						
Breach of restrictions relating to reletting (s16(E)(2) Housing Act 1988) or remarketing (s16(E)(3) Housing Act 1988) a property within restricted period after using Grounds 1 or 1A of Schedule 2 Housing Act 1988 - section 16J(2) of the Housing Act 1988	£25,000	£40,000	£20,000	£30,000	No specific factors identified.	No specific factors identified.

3. Renters Rights Act 2025

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Discrimination relating to children in the lettings process – section 33(1) of the Renters' Rights Act 2025	£6,000	£7,000	£4,800	£7,200	No specific factors identified	No specific factors identified
Discrimination relating to benefits in the lettings process – section 34(1) of the Renters' Rights Act 2025	£6,000	£7,000	£4,800	£7,200	No specific factors identified	No specific factors identified
Failure to specify proposed rent within a written advertisement or offer – section 56(2) of the Renters' Rights Act 2025	£3,000	£7,000	£2,400	£3,600	No specific factors identified	No specific factors identified
Inviting, encouraging or accepting any offer of rent greater than the stated rate – section 56(3) of the Renters' Rights Act 2025	£4,000	£7,000	£3,200	£4,800	No specific factors identified	No specific factors identified

4. Housing and Planning Act 2016

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Breach of a banning order - section 21(1) of the Housing and Planning Act 2016	£35,000	£40,000	£28,000	£42,000	A single, isolated incident	Concealment or evasion

5. The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 breach of duties

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (3)(b), (3)(d), (3)(e). Regulation 3D: (a), (b), (c), (f)	£5,000	£40,000	£4,000	£6,000	The report or record evidences that the electrical installations were compliant at all points.	The number or nature or severity of the issues observed on the report or record.
Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (3)(ca), (5)(b), (5)(c). Regulation 3B: (1)(a), (1)(b), (1)(c). Regulation 3C: (1), (2)(a). Regulation 3D: (d), (e)	£12,500	£40,000	£10,000	£15,000	The report or record evidences that the electrical installations were compliant at all points.	The number or nature or severity of the issues observed on the report or record.
Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (4), (5a), (6). Regulation 3E: (2)(b), (4)	£20,000	£40,000	£16,000	£24,000	No specific factors identified.	The number or nature or severity of the issues observed on the report or record.

6. Housing Act 2004 offences

	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to comply with an improvement notice - section 30(1) of the Housing Act 2004	£25,000	£40,000	£25,000	£30,000	The nature and extent of hazard(s) that are present once the deadline for compliance has passed. Whether the property is unoccupied once the deadline for compliance has passed. Access to the property was prevented by the actions or	The nature and extent of hazard(s) that are present once the deadline for compliance has passed.

					refusal of the occupant(s) and a landlord can evidence that they took steps to obtain access to the property for the purpose of carrying out the required works, but those steps fell short of establishing a reasonable excuse for non-compliance.	
Failure to comply with an overcrowding notice - section 139(7) of the Housing Act 2004	£20,000	£40,000	£16,000	£24,000	No specific factors identified.	The level of overcrowding present.
Failure to obtain an HMO licence - section 72(1) of the Housing Act 2004	£17,000	£40,000	£13,600	£20,400	No specific factors identified	The landlord has knowledge or experience of licensing requirements. The condition of the unlicensed property.
Knowingly permitting over-occupation of an HMO - section 72(2) of the Housing Act 2004	£20,000	£40,000	£16,000	£24,000	There are suitable amenity and space provisions in the HMO.	The level of over-occupation present.

7. Failure to Comply with The Management of Houses in Multiple Occupation [England] Regulations 2006 and The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 – section 234(3) of the Housing Act 2004

	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Duty of Manager to provide information to occupier	£3,000	£40,000	£2,400	£3,600	The nature and extent of offences within the specific regulation	The nature and extent of offences within the specific regulation The landlord has refused to provide any outstanding contact information more than 48 hours after it has been requested by an occupant or on behalf of an occupant.

Duty of manager to take safety measures	£20,000	£40,000	£16,000	£24,000	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to maintain water supply and drainage	£10,000	£40,000	£8,000	£12,000	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to supply and maintain gas and electricity	£12,000	£40,000	£9,600	£14,400	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to maintain common parts, fixtures, fittings and appliances	£7,000	£40,000	£5,600	£8,400	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to maintain living accommodation	£7,000	£40,000	£5,600	£8,400	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty to provide waste disposal facilities	£7,000	£40,000	£5,600	£8,400	The number, nature and extent of offences within the specific regulation	The nature and extent of offences within the specific regulation The lack of sufficient refuse and/or litter containers either inside and/or outside the property has been previously reported The refuse and/or litter that requires disposal includes hazardous materials

8. Housing Act 2004 - Section 72(3) - Breach of licence conditions

	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to comply with licence conditions related to: - • Signage or the provision of information for tenants • Provision of written terms of occupancy for tenants • 21 • Procedures regarding complaints • Procedures regarding vetting of incoming tenants • Compliance with deposit protection legislation • The recording and provision of information regarding rent payments • Procedures relating to rent collection • The provision of information regarding occupancy of the property • The provision of information regarding change of managers or licence holder details • The provision of information related to changes in the property • Requirements relating to the sale of the property • Attending training courses • Requirements to hold insurance • The provision of insurance documentation • The provision of or obtaining of suitable references • The provision of keys and alarm codes • Security provisions for access to the property • The provision of suitable means for occupiers to regulate temperature • Carrying out items on a schedule of works not otherwise mentioned in the	£4,000	£40,000	£3,200	£4,800	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach

HMO licence conditions section of this policy, relating to non-compliance with items on a schedule of works						
• Failure to comply with licence conditions related to: • Procedures and actions regarding Inspections • Procedures regarding Repair issues • Maintenance and use of common parts (including gardens, outbuildings and property exterior) and living areas • Safeguarding occupiers and minimising disruption during works • The provision of information regarding alterations and construction works • Procedures regarding emergency issues • Waste and waste receptacles, pests, minor repairs, alterations or decoration. • Giving written notice prior to entry • Allowing access for inspections • Minimising risk of water contamination • The compliance of furnishings or furniture with fire safety regulations • Carrying out items on a schedule of works in relation to provision of mechanical extraction or electrical sockets	£7,000	£40,000	£5,600	£8,400	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach
• Failure to comply with licence conditions related to: • The provision of documentation regarding energy performance certificates, fire detection and prevention, emergency lighting, carbon monoxide detection, fire risk assessments, gas installations, electric installations and appliances • Notification of legal proceedings, contraventions and other relevant information that may affect a fit and proper person status • Procedures and actions regarding ASB • Carrying out items on a schedule of works in relation to the provision of	£12,500	£40,000	£10,000	£15,000	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach

personal hygiene facilities, kitchen facilities or heating						
• Failure to comply with licence conditions related to: • Minimum floor areas • Occupancy rates • Occupancy of rooms or areas that are not to be used as sleeping accommodation • Limits on number of households allowed to occupy the property or part of the property	£20,000	£40,000	£16,000	£24,000	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach
• Failure to comply with licence conditions related to: • The condition or existence of smoke alarms, carbon monoxide alarms, emergency lighting, gas installations, electric installations and appliances, fire detection or other fire safety features or requirements • The provision and maintenance of safe means of escape, including requirements to keep escape routes and exits free from obstruction • Carrying out items on a schedule of works in relation to fire safety or the provision of a Carbon Monoxide detector	£25,000	£40,000	£20,000	£30,000	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach

Appendix 2

Statement of principles to determine the amount of a penalty charge under Part 4 of The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 as amended by The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 (“the Regulations”)

Section 13 of the Regulations requires local housing authorities to prepare and publish a statement of principles which they propose to follow in determining the amount of a penalty charge.

The Regulations introduced legal requirements on relevant landlords to:

1. Equip a smoke alarm on each storey of the premises on which there is a room used wholly or partly as living accommodation.
2. During any period when the premises were occupied under the tenancy, to ensure that a carbon monoxide alarm is equipped in any room of the premises which is used wholly or partly as living accommodation and which contains fixed combustion appliance other than a gas cooker.
3. Carry out checks by or on behalf of the landlord to ensure that each prescribed alarm is in proper working order on the day the tenancy begins if it is a new tenancy.
4. Where, following a report made on or after 1st October 2022 by a tenant or by their nominated representative to the landlord, a prescribed alarm is found not to be in proper working order, the alarm is repaired or replaced.

For the purposes of the legislation, living accommodation includes a bathroom or lavatory.

Where the Council believe that a landlord is in breach of one or more of the above duties, the Council must serve a remedial notice on the landlord. The remedial notice is a notice served under Regulation 5 of the Regulations.

If the landlord then fails to take the remedial action specified in the notice within the specified timescale, the Council can require a landlord to pay a penalty charge and can arrange for remedial action to be taken under certain circumstances. The power to charge a penalty arises from Regulation 8 of the Regulations. Failure to comply with each remedial notice can lead to a fine of up to £5,000. Fines will be applied per breach, rather than per landlord or property.

The Council will impose a penalty charge where it is satisfied, on the balance of probabilities, that the landlord has not complied with the action specified in the remedial notice within the required timescale.

A landlord will not be considered to be in breach of their duty to comply with the remedial notice if they can demonstrate they have taken all reasonable steps to comply. Where there is evidence, including written correspondence, of repeated and consistent efforts to obtain access to the property, with access repeatedly being prevented by the occupant(s) of the property, a landlord will

not be considered to be in breach of their duty to comply with the remedial notice. A landlord will be expected to have:

- Communicated the risk of harm that the lack of functioning alarms posed to all occupants in writing on multiple occasions
- Requested access to comply with the remedial notice on a regular basis of no longer than every seven days in writing

In considering the imposition of a penalty, the Council may look at the evidence concerning the breach of the requirement of the notice. A non-exhaustive list of methods that may be used to obtain relevant evidence includes, but is not limited to:

- Evidence obtained from a property inspection
- Evidence provided by the tenant or agent
- Evidence provided by the landlord demonstrating compliance with the Regulations by supplying dated photographs of alarms, together with installation records
- That all detector heads have not passed their expiration or replacement date

Landlords need to take steps to demonstrate that they have met the testing requirements at the start of the tenancy requirements. A non-exhaustive list of methods that may be used to evidence compliance with these testing requirements includes, but is not limited to:

- Tenants signing an inventory form which states that they observed the alarms being tested and confirming that the alarms were in working order at the start of the tenancy

Where a landlord is in breach, the local housing authority may serve a remedial notice. Failure to comply with each remedial notice can lead to a fine of up to £5,000. Fines will be applied per breach, rather than per landlord or property

When determining the amount of the penalty charge, regard will be had to whether this is a first breach under the Regulations.

Determining the amount of the penalty charge for a first breach

The minimum amount of a penalty charge for a first breach of the Regulations will be £2500. Only in exceptional circumstances may the Council depart from the application of this statement of principles and issue a penalty charge for less than £2500. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors

The starting level of a penalty charge for a first breach of the Regulations will be £3000. The penalty charge amount will then be varied depending on aggravating and mitigating factors.

Aggravating factor include, but are not limited to:

- The number of alarms not working or missing (the Regulations state there should be one per storey)
- Other fire safety concerns/defects in the property which increase the risk posed to the occupants
- The length of time the offence is believed to have been on-going

- The frequency of complaints by the occupiers to the landlord about the non-working or missing alarms
- The costs of any remedial work the Council have carried out in response to the breach
- Whether the property is let as a HMO (which increases the overall risk)
- The number of occupants living in the property
- Presence of vulnerable occupiers such as elderly, children or disabled people
- Any history of previous enforcement or non-compliance of the landlord
- Attempts to obstruct the investigation

Mitigating factors include, but are not limited to:

- The property being small and low-risk (for example a one-bedroom ground floor flat with a large number of fire escapes including large windows)
- A single occupant living in the property
- Evidence that all required alarms were checked and in working order at the start of the tenancy
- Written evidence that some efforts to gain access and comply with the remedial notice were made and access was prevented by the occupant

Determining the amount of the penalty charge for a subsequent breach

The penalty for subsequent breaches by the same landlord will be £5000. Only in exceptional circumstances may the Council depart from the application of this statement of principles and issue a penalty charge for less than £5000. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors.

Appendix 3

Statement of principles to determine the amount of a penalty charge for a breach of minimum energy efficiency standards (MEES) with respect to domestic privately rented property

The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (“the Regulations”) make it unlawful to rent out a domestic property if it has an EPC (Energy Performance Certificate) rating of F or G (unless a valid exemption has been registered on the PRS Exemptions register).

The Regulations make it unlawful to fail to comply with a compliance notice served by the Council.

The Regulations cover all relevant properties, even where there has been no change of tenancy.

The Regulations were introduced to improve the energy efficiency of housing in the private rented sector and to reduce greenhouse gas emissions and tackle climate change. They should help make tenants’ homes more thermally efficient.

An energy performance certificate (EPC) gives the property an energy efficiency rating – A rated properties are the most energy efficient and G rated are the least efficient. It’s valid for 10 years and must be provided by the owner of a property, when it is rented or sold.

If you are a landlord and you fail, when requested, to provide an EPC for the start of a tenancy, you will be in breach of the Regulations.

An EPC contains information about the type of heating system and typical energy costs. It also gives recommendations about how the energy use could be reduced, lowering running costs. You can find the recommended energy efficiency improvements on the current EPC.

If you’re a private landlord, you must either:

- ensure your rented properties have an EPC with a minimum ‘E’ rating
- register a valid PRS exemption on the PRS exemptions register

Failure to do either of these is a breach of the Regulations.

The Council investigates any potential breaches of the regulations. If the Council is satisfied that you are, or have at any time in the 18 months preceding the date of service of the penalty notice, breached the Regulations, you may be subject to a penalty notice imposing a financial penalty. The Council may also impose a publication penalty.

The “publication penalty” means publication, for a minimum period of 12 months, or such longer period as the Council may decide, on the PRS Exemptions Register of such of the following information in relation to a penalty notice as the Council decides:

- Where the landlord is not an individual, the landlord’s name
- Details of the breach of these Regulations in respect of which the penalty notice has been issued
- The address of the property in relation to which the breach has occurred, and
- The amount of any financial penalty imposed.

The Council will impose the following financial penalties:

- (a) letting a property with an F or G rating for less than 3 months: £2,000
- (b) letting a property with an F or G rating for more than 3 months: £4,000
- (c) registering false or misleading information on the PRS exemptions register: £1,000
- (d) failing to provide information to the Council demanded by a compliance notice: £2,000

The Council may not impose a financial penalty under both subsections (a) and (b) above in relation to the same breach of the Regulations. But they may impose a financial penalty under either paragraph (a) or paragraph (b), together with financial penalties under paragraphs (c) and (d), in relation to the same breach. Where penalties are imposed under more than one of these paragraphs, the total amount of the financial penalty may not be more than £5,000.

APPENDIX B

COMMUNITY SERVICES			
1. Strategic Housing			
Subject	Detail	Delegated by:	Delegated to:
Discretionary Housing Assistance Grants.	To determine applications for Housing Assistance Grants under the Regulatory (Housing Assistance Grants) (England and Wales) Order 2002.	Cabinet/ Leader.	Strategic Housing Manager.
Home improvement Agency	To deal with day to day management of the Home Improvement Agency Service	Cabinet	Assistant Director of Community and Housing Services/ Strategic Housing Manager/Private Sector Team Leader
General regulatory and enforcement activity for private sector housing (including Houses of Multiple Occupation)	1. To exercise all local authority regulation and enforcement functions under the legislation listed below:- - Housing Act 1985 - Housing Act 1988 - Housing Act 2004 (and associated regulations) - Housing and Planning Act 2016 - Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 - Environment Protection Act 1990 section 79(1)(a) - Building Act 1984 - Local Government (Miscellaneous Provisions) Acts 1976, 1982	1.	Strategic Housing Manager

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To sign housing-related notices for houses in multiple occupation under the Housing Act 2004.

To inspect conditions under the Housing Health and Safety Rating System - Housing Act 2004.

To issue interim and final orders

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3. Strategic Housing Manager.

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APPENDIX 2

	• <u>Prevention of Damage by Pests Act 1949</u> • <u>Public Health Act 1961</u> 2. To institute legal proceedings <u>for offences under the legislation listed above.</u> 3. To impose a financial penalty for an offence as an alternative to bringing a prosecution.		
Housing Associations - Nominations.	To deal with the nomination where necessary of homeless applicants to housing association dwellings.	Cabinet/ Leader.	Strategic Housing Manager.
Housing Capacity Study.	To update the site details and housing figures in the Housing Capacity Study on an annual basis using data from the Housing Land Availability Study.	Cabinet/ Leader.	Strategic Housing Manager.
Housing Corporation Social Housing Grant.	To administer and approve applications and to authorise payment of local authority grant and Housing Corporation Grant under the Housing Corporation IMS System.	Cabinet/ Leader.	Strategic Housing Manager.
Housing Grants.	To determine applications for housing grants under the Housing Grants, Construction and Regeneration Act 1996.	Cabinet/ Leader.	Strategic Housing Manager.
Low Cost Housing.	1. To administer the Council's low cost housing scheme including the making of nominations and the sale of the Council's interest in dwellings.	1. Cabinet/ Leader.	1. Strategic Housing Manager. 2. Principal Solicitor.

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APPENDIX 2

	2. To take all necessary action including the institution of legal proceedings to recover deferred payments from the purchases of low cost homes who are in breach of covenants made in the purchase of low cost housing. 3. To revise fees in relation to low cost housing transactions.	2. Cabinet/ Leader. 3. Cabinet/ Leader.	3. Assistant Director of Legal, Democratic and Procurement Services, Assistant Director of Community and Housing Services and Financial Services Manager in consultation with the relevant Portfolio Holders.
Low-Cost Housing Capital Receipts (New delegation agreed by Members in 2024/25)	To approve individual proposals for new developments or the purchase of existing satisfactory dwellings and flipping Shared Ownership to affordable or social rented properties and the spend relating to these, as and when they were brought forward.	Council	The Assistant Director Community and Housing Services following consultation with the Portfolio Holder for Strategic Housing.
Mandatory Disabled Facilities Grant.	1. To determine applications for housing grants under the Housing Grants, Construction and Regeneration Act 1996. 2. To grant extensions of time of up to six months within which improvements are to be completed.	1. Cabinet/ Leader. 2. Cabinet/ Leader.	1. Strategic Housing Manager. 2. Assistant Director of Community and Housing Services.
Protection from Eviction Act.	<u>1. To institute legal proceedings in respect of illegal evictions and harassment under the provisions of the</u>	Cabinet/ Leader	<u>1 and 2</u> Assistant Director of Community & Housing Services in consultation

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APPENDIX 2

	Protection From Eviction Act 1977 and Housing Act 1988 (as amended by the Renters Right Act 2025). 2. To impose a financial penalty for an offence under section 1 of the Protection from Eviction Act (as amended) as an alternative to bringing a prosecution.		with Principal Solicitor.
Discrimination in the rental market	To take enforcement action under Chapter 3 of the Renters Rights Act 2025, including the imposition of financial penalties in accordance with the Councils Enforcement and Civil Penalties Notice Policy	Cabinet/ Leader	Assistant Director of Community and Housing Service
Stating the proposed rent and rental bidding	To take enforcement action under Chapter 6 of the Renters Rights Act 2025, including the imposition of financial penalties in accordance with the Councils Enforcement and Civil Penalties Notice Policy	Cabinet/Leader	Assistant Director of Community and Housing Service
Renters Rights Act 2025 – investigatory powers (Added following report on Renters Right Act in March 2026)	To exercise all powers in respect of entry, inspection, investigation, service of notices and other functions for the purposes of the following legislation: - Renters Rights Act 2025 sections 114 to 132 (investigatory powers) and section 110 (reporting to government)	Cabinet/ Leader	Assistant Director of Community and Housing Services] / [Housing Strategy Manager] / [Private Sector Housing Team Leader] / [Housing Strategy & Enabling Team Leader] / [Private Sector Housing Officer]

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APPENDIX 2

Renters Rights Act 2025 Investigations (Added following report on Renters Right Act in March 2026)	To undertake investigations into potential offences under sections 33, 34, 39 and 56 of the Renters Rights Act 2025	Cabinet/ Leader	[Assistant Director ofCommunity and Housing Services] / [Housing Strategy Manager] / [Private Sector Housing Team Leader] / [Housing Strategy & Enabling Team Leader] / [Private Sector Housing Officer]	Formatted: Font: 12 pt Formatted: Font: 12 pt Formatted: Font: 12 pt Formatted: Font: 12 pt Deleted: Formatted: Font: 12 pt
Private Sector Housing Enforcement and Civil Penalty Policy	To update the Policy in line with any legislative or government guidance updates	Cabinet/ Leader	Assistant Director of Community and Housing Service following consultation with the Portfolio Holder for Housing	Formatted: Font: +Body (Aptos), Not Bold Formatted: Font: +Body (Aptos) Formatted: Font: 11 pt Formatted: Font: +Body (Aptos) Formatted: Indent: Left: 0 cm Formatted: Indent: Left: -0.1 cm, First line: 0 cm, Space After: 10 pt, Line spacing: Multiple 1.15 li, Tab stops: Not at 0.6 cm Formatted: Font: +Body (Aptos) Deleted: ¶ ¶ ¶ ¶ Formatted Table
Utilities - Restoration or Continuance of Services.	To deal in consultation with the relevant Portfolio Holder and generally in accordance with emergency procedures with applications received pursuant to the arrangements according to section 33 of the Local Government (Miscellaneous Provision) Act 1976 (Public Utility Services to Dwellings) and to take such action as may be necessary for the recovery of any payments made by the Council in pursuance of such arrangements.	Cabinet/ Leader.	Executive Director Finance or Assistant Director of Community and Housing Services	
Regulation of Mobile Home Sites	To institute legal proceedings under section 1 of the Caravan	Council	Strategic Housing Manager in	

APPENDIX 2

	Sites and Control of Development Act 1960 To take all steps to manage and regulate Mobile Home Sites, including the exercise of power of entry under the following legislation:- • Caravan Sites and Control of Development Act 1960 • <u>Caravan Sites Act 1968</u> • <u>Mobile Homes Act 2013</u>	Cabinet/Leader	consultation with the Principal Solicitor Strategic Housing Manager
Energy Efficiency (Private Rented Sector) (England & Wales) Regulations 2015	To implement enforcement powers under the Energy Efficiency (Private Rented Sector) (England & Wales) Regulations 2015	Cabinet	Assistant Director of Community and Housing Services
First Homes	To make amendments to Council's the First Homes Policy to reflect future Government guidance	Cabinet	Assistant Director of Community and Housing Services following consultation with the Portfolio Holder for Strategic Housing
Local Lettings Plan	To agree and adopt future Local Lettings Policies	Cabinet	Assistant Director of Community and Housing Services following consultation with the Portfolio Holder for Strategic Housing
Requisition for Information	To serve a requisition for information under section 16 of the Local Government (Miscellaneous Provisions Act 1976	Cabinet/Leader	Strategic Housing Manager
Boarding up of dangerous buildings	To serve notice under Section 9 of the Local Government	Cabinet/Leader	Strategic Housing Manager

APPENDIX 2

	(Miscellaneous Provisions) Act 1982		
Statutory Nuisance	To take all necessary action in relation to statutory nuisance under the Environmental Protection Act 1990.	Council	Strategic Housing Manager

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BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

17TH JUNE 2026, AT 6.00 P.M.

PRESENT: Councillors K.J. May (Leader), S. J. Baxter (Deputy Leader), S. T. Nock, K. Taylor and P. J. Whittaker

Officers: Mr. G. Revans, Mr. J. Walton, Mrs. R. Egan, Mr. M. Bough, Mrs. H. Mole, Ms. A. Delahunty, Ms. R. McElliott, Mrs. J. Bayley-Hill and Mrs E. Davies

1/26 **TO RECEIVE APOLOGIES FOR ABSENCE**

An apology for absence was received from Councillor S. A. Webb.

Cabinet was informed that Councillor K. Taylor would be arriving late for the meeting, however he would be in attendance.

2/26 **DECLARATIONS OF INTEREST**

There were no Declarations of Interest.

3/26 **TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE CABINET HELD ON 20TH APRIL 2026**

The minutes of the Cabinet meeting held on 20th April 2026 were submitted for Members' consideration.

RESOLVED that the minutes of the Cabinet meeting held on 20th April 2026 be approved as a true and accurate record.

4/26 **MINUTES OF THE MEETING OF THE OVERVIEW AND SCRUTINY BOARD HELD ON 14TH APRIL 2026**

It was noted that there were no outstanding recommendations from the meeting of the Overview and Scrutiny Board held on 14th April 2026.

RESOLVED that the minutes from the Overview and Scrutiny Board meeting held on 14th April 2026 be noted.

5/26 **APPOINTMENTS TO THE SHAREHOLDERS COMMITTEE 2026/27**

The Principal Democratic Services Officer presented a report concerning appointments to the Shareholders Committee for the 2026/27 municipal year.

The Committee was advised that, as the Shareholders Committee was a sub-committee of the Cabinet and formed part of the governance structure for Spadesbourne Homes Limited, it was the Cabinet's responsibility to appoint Members to serve on the Committee. This included the appointment of a Chairman and Vice-Chairman.

It was further noted that only members of the Cabinet were eligible to serve on the Committee. However, Group Leaders would continue to be invited to attend meetings of the Shareholders Committee and participate in debates if they so wished, although they would not have voting rights.

RESOLVED that

1) The following Members of the Cabinet be appointed to sit on the Shareholders Committee for the 2026/27 municipal year:

- Councillor K.J. May
- Councillor S.T. Nock
- Councillor K. Taylor
- Councillor S.A. Webb
- Councillor P.J. Whittaker

2) Councillor K.J. May be appointed as Chairman of the Committee for the 2026/27 municipal year; and

3) Councillor P.J. Whittaker be appointed the Vice Chairman of the Committee for the 2026/27 municipal year.

6/26

CABINET APPOINTMENTS TO OUTSIDE BODIES 2026/27

The Principal Democratic Services Officer presented the Cabinet Appointments to Outside Bodies 2026/27 report for Members' consideration.

It was noted that Council had made a number of appointments to Outside Bodies at the Annual Council meeting held on 20th May 2026. However, several appointments related to executive functions and, as such, these were to be determined by the Cabinet.

RESOLVED that

the nominations to Outside Bodies as listed in Appendix 1 to the minutes be approved.

7/26

SHARED HOMELESSNESS STRATEGY 2026-2031

The Housing Development and Strategy Manager presented a report on the Shared Homelessness Strategy 2026-2031.

The Committee was reminded that the draft Shared Homelessness and Rough Sleeping Strategy 2026–2031 had been approved for public

consultation by the Cabinet on 25th March 2026. The consultation had subsequently been completed, and responses had been incorporated into the action plan where appropriate.

It was reported that the strategy included Local Outcomes Framework measures provided by the Ministry for Housing, Communities and Local Government (MHCLG). MHCLG had reviewed the strategy and confirmed that it was compliant, although a number of recommended actions had been suggested which had been incorporated into the action plan.

The framework utilised a range of national outcome indicators to assess performance, including:

- The rate of households with children in temporary accommodation (per 1,000 households)
- The number of families in Bed and Breakfast (B&B) accommodation for over six weeks
- The percentage of duties owed where homelessness was prevented or relieved
- The number of people sleeping rough on a single night
- The number of people sleeping rough over the month who were long-term rough sleepers

The Committee was informed that delivery of the strategy would be overseen by the Housing Strategy Team and would sit under the existing Worcestershire Housing Board Plan.

In respect of financial implications, it was confirmed that the Homelessness, Rough Sleeping and Domestic Abuse Grant would provide funding to support the development of services aligned with the strategy. A report detailing spending priorities for the subsequent three years had already been presented to Members.

It was highlighted that the Council had a statutory duty under the Homelessness Act 2002 to produce a homelessness strategy, alongside compliance with the Homelessness Reduction Act, the Domestic Abuse Act 2021 and the Renters Rights Act 2025.

With regard to Local Government Reorganisation, Members were reassured that the strategy had been developed to be adaptable for incorporation into either one or two unitary authorities.

An Equality Impact Assessment had been completed, which demonstrated a positive outcome. It was noted that officers would continue to monitor impacts.

The risks associated with the Cabinet not approving the strategy were outlined. It was reported that this would result in the Council not being legally compliant. Furthermore, it was considered likely that households threatened with homelessness, or those in housing need, would have limited options for support to sustain or secure suitable accommodation. This could lead to:

- Increased B&B costs
- Increased rough sleeping in the District
- Impacts on physical and mental health, educational achievement, ability to work and similar through increased homelessness

Following the presentation, Members discussed the report in detail and made the following comments:

- The Cabinet Member for Planning and Strategic Housing expressed thanks to the Housing Development and Strategy Manager for the report.
- It was noted that the action plan was extensive and Members queried whether this would pose a delivery challenge. Officers advised that a meeting was scheduled in the coming weeks to review the action plan and ensure that Bromsgrove District Council could deliver the relevant elements. Members were reassured that collaborative work with partner authorities was ongoing.
- Members queried the potential impact of the Renters' Rights Act 2025 on the strategy and whether a future review would be required. Officers advised that the Act had already begun to influence the housing sector prior to its enactment. Increased regulatory requirements had led to some landlords exiting the sector or selling properties, although it was anticipated that impacts would stabilise over time, particularly following the abolition of Section 21 evictions. It was hoped that landlords would become more willing to work with local authorities to manage tenancies, contributing to greater sector stability.
- The requirement for landlords to provide Energy Performance Certificates (EPCs) and the associated costs of improving energy efficiency were discussed. Officers advised that minimum energy efficiency standards were measured through EPCs. It was noted that ratings reflected typical energy costs and could be improved through measures such as the installation of solar panels.

RECOMMENDED that the Shared Homelessness and Rough Sleeping Strategy 2026-2031 be approved.

ECONOMIC DEVELOPMENT & REGENERATION SERVICE DELIVERY

The Assistant Director for Regeneration and Property Services presented a report on Economic Development and Regeneration Service Delivery for the Committee's consideration.

The report sought approval for the release of £510,000 from the Economic Growth Reserve to continue funding key economic development and regeneration activities until 2028.

The Committee was advised that the programme operated within the Local Enterprise Partnership (LEP) funding model. It was noted that funding from the UK Shared Prosperity Fund (UKSPF) was due to cease and that no replacement funding stream had yet been confirmed.

Members were informed that, should the funding not be released, Bromsgrove residents would receive a significantly reduced level of support, limited to that provided through the Worcestershire Growth Hub. It was confirmed that sufficient reserves were available and that funding would remain for other programmes.

In relation to Betaden, it was reported that officers were continuing to finalise the details of the Service Level Agreement (SLA), with some negotiations still outstanding. The original proposal had been that the Council would make a financial contribution in return for a guaranteed number of places on the programme. However, the number of places proposed significantly exceeded previous levels of take-up. It had subsequently been agreed that the Council would fund workshop places on a demand-led basis, whereby a fee would be payable for each business securing a place. The precise amount remained under negotiation.

Following presentation of the report, Members discussed the following points:

- The Leader emphasised the importance of the funding, particularly in the context of Local Government Reorganisation. It was noted that the Worcestershire Leaders Board had confirmed that it would provide funding to the Worcestershire Growth Hub and Betaden. It was further highlighted that approximately 6 per cent of young people were not in employment, a situation which had been affected by increases in National Insurance rates.
- Members queried how success would be measured. Officers advised that the SLAs would set out how businesses would be supported and that data would be collected on how funding had been utilised. Progress updates would be reported back to the Cabinet.

- Clarification was sought regarding how the funding would be allocated and whether it would support businesses in employing additional staff. Officers advised that the Growth Hub employed staff to provide business support and guidance on available funding opportunities, some of which could be used towards staffing. Betaden provided programme and workshop places offering one-to-one business support. Careers Worcestershire utilised funding to employ staff who worked with young people to support them into employment, including assistance with the interview process where barriers such as transport or confidence issues existed.
- Members welcomed the support for new businesses and young people, particularly in helping school leavers into employment. It was queried how this aligned with apprenticeship schemes and whether signposting would be provided. Officers confirmed that, although the funding focused on youth employment, Careers Worcestershire also supported apprenticeship schemes, and appropriate signposting could therefore be provided.

[Councillor K. Taylor arrived at the meeting during consideration of this item at 6.33pm]

RESOLVED that:

- 1) Earmarked reserves be released to fund economic development and regeneration activities as follows:
 - a. Worcestershire Growth hub - £140,000
 - b. Careers Worcestershire - £300,000
 - c. Betaden - £70,000

9/26

ENFORCEMENT AND CIVIL PENALTY POLICY

The Strategic Housing Services Manager presented the Enforcement and Civil Penalty Notice Policy report.

The Committee was informed that this report followed on from the previous report presented to the Cabinet regarding the Renters' Rights Act 2025. The Private Sector Housing Enforcement and Civil Penalty Notice Policy had been reviewed and re-written in response to the Act as it required significant alteration due to new enforcement duties arising.

Members were advised that the policy aligned with national best practice, including the Association of Chief Environmental Health Officers (ACEHO) model Enforcement and Civil Penalty Policy, and established a clear,

consistent and legally robust framework for enforcement decision making and the application of civil penalties.

The policy applied to all private sector housing-related enforcement functions exercised by the Council, including private rented housing, owner-occupied housing, empty homes, Houses in Multiple Occupation and relevant site-based accommodation, where statutory powers applied.

It set out the Council's approach to enforcing statutory requirements relating to, among other matters:

- misuse of possession grounds
- unlawful rent practices, including rent bidding
- failure to provide prescribed tenancy information
- discriminatory letting practices
- compliance with the Private Rented Sector Database (once in force)

The implementation of the policy was expected to contribute to improved housing conditions, reduced health risks and increased tenancy security and within the District.

Members' attention was drawn to the matrix of civil penalties notices, which was based on national best practice. It took into account the size of a landlord's property portfolio and the number of offences.

In considering the report, Members commented on the following points:

- The complexity of the matrix. Officers acknowledged this and advised that the complexity was reflected in the level of detail contained within the policy. It was further noted that any appeals against decisions would be determined by a first-tier tribunal (Property Chamber).
- Concerns were raised that the listed costs for offences appeared severe at first glance. However, it was noted that the policy set out an initial informal approach for some offences, providing an opportunity for issues to be resolved before any formal enforcement action was taken. Officers clarified that the level of fines had been set by Government and that the Council had adopted a staged approach in line with national best practice. It was further explained that, where appropriate, an advisory and information-led approach would be taken in the first instance, although certain breaches, such as confirmed illegal evictions, would result in a civil penalty notice or prosecution.
- Members queried whether the policy provided protection for landlords in situations where tenants caused damage to properties. It was noted that the Renters' Rights Act 2025 was primarily focused on tenant protection. Officers clarified that the policy related specifically to enforcement standards for property conditions and tenant protections, rather than

landlord recourse. It was further explained that landlords retained the ability to take action through existing legal routes, including strengthened Section 8 provisions.

- Questions were raised regarding how the Council would identify unregistered landlords. Officers advised that landlords were not currently required to register. However, the Renters' Rights Act 2025 would introduce a national property database requiring registration. It was reiterated that the purpose of the policy was to ensure that tenants lived in safe and suitable accommodation.
- Whether the service had sufficient capacity to deliver against the requirements of the policy. Officers advised that the team had previously been expanded in anticipation of these changes. Whilst demand was high, this had not yet resulted in significant additional pressures. It was further noted that New Burdens funding had been provided by Government, which could support additional resources, such as IT systems or staff training, if required. Staffing levels would continue to be kept under review.
- If there had been any observable impacts arising from recent legislative changes, particularly in relation to homelessness. Officers confirmed that there had been a slight increase in cases linked to Section 21 notices, but this had not represented a significant change overall and Section 21 notices were now abolished.
- It was emphasised that the legislation was focused on tenant protection and that the Council had a duty to ensure that tenants were safeguarded. The policy was described as comprehensive in this regard.
- Members noted that landlords would need to ensure they maintained appropriate records and documentation, including photographic evidence of property condition, in order to demonstrate compliance where issues were raised by tenants.

RESOLVED that

- 1) Members approve the Private Sector Housing Enforcement and Civil Penalty Policy ("the Policy").

RECOMMENDED that

- 2) Delegated authority be granted to the Assistant Director Community & Housing Services, following consultation with the Portfolio Holder for Housing, to update the Policy in line with any legislative or government guidance updates.
- 3) The Scheme of Delegations be updated to reflect the adoption of the Policy and the new Enforcement powers under the Renters Rights Act 2025 in accordance with the wording set out in Appendix B (Appendix 2 to the minutes).

10/26

QUARTER 4 25/26 PERFORMANCE REPORT

The Business Improvement Manager presented a report outlining performance across Quarter Four.

Members were advised that the overall position remained stable for the quarter. The key highlights were outlined to the Committee, including that one hundred per cent of major planning applications had been determined, a reduction in the use of temporary accommodation and response times for fly-tipping incidents remained operationally stable. However, it was noted that recycling performance and the proportion of complaints responded to within the ten-day standard, recorded at eighty-five per cent, required improvement.

Following presentation of the report, Members discussed the following matters:

- Members suggested that this positive performance should be more effectively utilised within communications to residents in order to spread the positive message.
- The issue of sickness absence was discussed. Concerns were raised regarding the potential impact on particular service areas, and Members expressed a desire for future reports to distinguish between short-term and long-term sickness absence. It was also suggested that comparative data be provided against neighbouring authorities. Officers confirmed that long-term sickness absence had reduced and that the Council's targets were aligned with the national average, which was approximately seven point eight per cent. It was further acknowledged that Local Government Reorganisation may have had an impact on staff morale and stress levels.
- Performance in respect of business rates collection was noted to be strong.
- Members raised concerns regarding gym membership figures, which were below the target of 3,000 and stood at 2,264 in Quarter Three, with what appeared to be a downward trend. It was confirmed that a report regarding the performance of Sports and Leisure Management (SLM) Limited would be presented to the Overview and Scrutiny Board in July 2026, at which point further detail would be provided. SLM would be in attendance at the meeting.
- In relation to the apparent decline in gym membership figures, officers acknowledged that the way in which the data had been presented had created a potentially misleading impression of a sharp drop. It was suggested that future reporting should present this data more clearly to avoid misinterpretation. It was also noted that the targets set within the report reflected contractual arrangements and were considered ambitious, and these would be reviewed as part of the forthcoming report.

- Members discussed factors influencing gym membership retention, including seasonal variations. Officers advised that membership cancellations occurred at different intervals, commonly after a period of around three months, although some members retained memberships for longer periods. It was noted that SLM monitored membership retention. Members also highlighted the level of competition within the local area and queried whether this was impacting membership levels. Officers confirmed that local competition and the overall offer, including pricing and facilities, would be considered as part of the forthcoming review.

RESOLVED that the overview of Quarter 4 performance for the period January to March 2026 against the Council Plan priorities be noted.

11/26

VAT RECOVERY UPDATED POSITION

The Director of Finance and Section 151 Officer presented a report on the subject of the updated VAT recovery position.

Members were advised that, following the implementation of a new financial system in 2021, a number of issues had arisen, compounded by staff turnover and weaknesses in processes at that time. As a result, VAT returns had not been submitted to HMRC for the period April 2021 to October 2024 and HMRC had therefore been holding funds due to be returned to the Council. A chronology of events had been provided within the report.

It was reported that, once the issue had been identified, it had been agreed with HMRC that Error Correction Notices (ECNs) would be submitted in order to recover the funds. An initial sum of £472,000 had been received in December 2024, which was subsequently reversed through the ECN process. Further work had been undertaken to review the 'General Ledger' and identify additional amounts where VAT had not been appropriately accounted for. A final ECN, submitted on 12th June 2026, totalled £1.79 million, resulting in a net position of approximately £1.76 million due to Bromsgrove District Council from HMRC.

Members were advised that this recovery would have a positive impact on the Council's cash position. It was noted that the accounting for each of the affected years had already been reflected in the Council's accounts and therefore no additional reserves would be created. However, the improved cash position would reduce the need for borrowing and provide increased opportunities for investment. Confirmation from HMRC in relation to the final ECN was yet to be received.

In considering the report, Members had detailed discussion and commented on the following points:

- Reference was made to Redditch Borough Council's position, where a significantly larger sum had been identified. Officers explained that this reflected structural differences between the authorities, including

Redditch's larger budget, larger capital programme and the operation of a Housing Revenue Account, which all led to a higher volume of transactions and associated VAT. It was further noted that Bromsgrove was responsible for billing Redditch for a higher proportion of Shared Services provided between the authorities.

- Members queried the accuracy of the figure for Bromsgrove. Officers advised that, whilst the amount had been calculated based on the information available, it could not be formally confirmed until HMRC had completed its review.
- Concerns were raised regarding previous estimates that had suggested a significantly higher figure. It was noted that the situation was very complex and figures were continually changing until the claim had been submitted to HMRC.
- Discussion took place regarding the VAT treatment of shared services between Bromsgrove and Redditch. Officers explained that as a result of the arrangements i.e. Bromsgrove billing Redditch, the VAT position was offset in Bromsgrove but increased in Redditch. Bromsgrove was not charged VAT on the underlying costs e.g. salaries, but Redditch was charged VAT on the same services as they were purchasing a valuable service from Bromsgrove. This led to a higher recovery of VAT in Redditch than Bromsgrove.
- Members sought clarification on whether Bromsgrove had been disadvantaged by these arrangements. Officers outlined that this was not the case as this was about delayed recovery of VAT, not a benefit. It was noted that the complexity of VAT accounting within shared services made direct comparisons between the authorities difficult.
- Members questioned how the issue had not been identified at an earlier stage. Officers advised that the implementation of a new financial system, combined with staff turnover and a lack of specialist VAT expertise at the time, had contributed to the oversight.
- Further concerns were raised regarding the role of internal and external audit in identifying the issue. Officers clarified that internal audit operated on a risk-based approach and reviewed specific areas rather than providing continuous oversight of all processes. External audit provided assurance on the overall accounts, but delays in the production of accounts for the relevant period had limited this assurance.
- The financial implications of the delayed recovery, including the potential loss of investment income. Officers advised that, whilst this could be estimated, there was no mechanism to reclaim such losses from HMRC.
- The importance of strengthening financial controls and processes was emphasised. It was confirmed that Internal Audit had been tasked with undertaking a review of existing arrangements to provide assurance and identify any necessary improvements.
- Members acknowledged the need to focus on ensuring robust systems were in place going forward.

The Cabinet Member for Finance expressed thanks to the Director of Finance and Section 151 Officer for presenting the report. He noted that securing a net cash recovery represented a positive outcome for the Council's financial position and, as outlined in the report, reflected a

comprehensive retrospective review. It was reiterated that, as these adjustments had already been processed, they constituted a direct improvement to the Council's cash flow rather than impacting on reserves.

The Cabinet Member for Finance emphasised that, when making comparisons with Redditch Borough Council, it was important to recognise the differing structural profiles of the two authorities.

RESOLVED that

- 1) The actions being undertaken to resolve the outstanding VAT matters be noted.
- 2) An expected net cash gain position to be recovered by the council, including the further anticipated recovery of the current Error Correction Note, be noted.
- 3) The improvement of this on the cashflow position be noted and the corporate risk register duly updated to reflect the positive change to the council's cash holding position.
- 4) The Audit, Standards and Governance committee is requested to maintain oversight of the delivery of actions to satisfy any agreed penalty suspension conditions.

12/26

WINDSOR STREET DELIVERY OPTIONS

The Regeneration Programme Manager presented a report on delivery options for Windsor Street.

Members were reminded that, in November 2025, a report had been considered outlining options for the redevelopment of Windsor Street, with Cabinet resolving that the site should be developed for residential purposes in partnership with a Registered Social Landlord (RSL). It was reported that external funding had been secured to de-risk the project without requiring match funding from the Council.

Phase two had commenced recently and included a twelve-month monitoring period. Any overspend was being met from the Levelling Up contingency budget.

Members were advised that discussions had taken place with a number of RSLs. Of the five organisations approached, three had indicated that they were not interested in the site, while two had expressed an interest in acquiring the site to deliver one hundred per cent affordable housing. However, both RSLs had indicated a preference for outright acquisition rather than entering into a partnership arrangement.

On this basis, officers had explored the option of securing outline planning permission prior to disposal, which would also allow the Council to influence the design and reduce potential delays. It was noted that although this was not the original plan, it aligned with the strategic objectives of the site and

RSLs could submit proposals which would allow the Council to retain control over which scheme was selected.

The proposal therefore sought funding of £150,000 from reserves to progress an outline planning application. It was noted that this amount would be replenished upon disposal of the site, which was expected to generate a capital receipt and provide a return on investment.

In considering the report, Members had detailed discussion and commented on the following matters:

- It was highlighted that the proposed development would include affordable housing, which could comprise shared ownership as well as social housing.
- Members queried how the £150,000 figure had been determined. Officers explained that the estimate was based on comparable costs for preparing outline planning applications, including the requirement for surveys, supporting evidence, and external expertise. It was noted that costs could vary depending on the level of detail included within the application.
- Members discussed the level of detail to be included in the planning application, with the view that greater detail could provide enhanced control over the eventual scheme.
- It was suggested that RSLs could be invited to develop proposals that met the Council's requirements prior to submission of a planning application. Officers advised that, following soft market testing, ongoing dialogue with interested RSLs would continue to ensure that proposals reflected viability and local housing needs.
- Timeframes were queried. Officers advised that site remediation was expected to be completed by September 2026 and the twelve-month monitoring period would be completed by September 2027. The planning process was anticipated to take between six and twelve months.
- Members queried whether parts of the site could be used for temporary accommodation to reduce reliance on Bed and Breakfast provision. Officers advised that significant infrastructure would be required to make this feasible and that associated costs would be significant.
- An update was provided on site remediation works, including groundwater monitoring and mitigation measures. It was reported that remediation was being undertaken and monitored in accordance with Environment Agency requirements, with a barrier being installed on one area of the site to prevent further contamination spread.
- Clarification was provided following consultation with the Monitoring Officer, confirming that the Leader could be involved in decisions relating to the progression of a planning application in the Council's capacity as landowner, but not in the determination of the application itself.

RESOLVED that

- 1) The feedback received from Registered Providers be noted.
- 2) Delegated authority be given to the Assistant Director for Regeneration and Property, following consultation with the Portfolio Holder, to progress an outline planning application for the Windsor Street site for up to 50 residential units.
- 3) Subject to the granting of outline planning permission and completion of Phase 2 remediation works, that the Windsor Street site be disposed of to a Registered Provider.
- 4) Delegated authority be given to the Assistant Director for Regeneration and Property, following consultation with the Portfolio Holder to agree the terms of disposal and select the Registered Provider, following evaluation of proposals against the Council's objectives.
- 5) A budget of up to £150,000 be approved to meet the costs of progressing the outline planning application.

13/26

TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR OF LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIRMAN, BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT MEETING

There was no Urgent Business on this occasion.

The meeting closed at 8.03 p.m.

Chairman

Appendix 1: Outside Bodies By Office (Cabinet appointments)

Organisation	Number of representatives and length of term	Appointed 2025/2026	Nominations 2026/2027
Bromsgrove Partnership (Local Strategic Partnership)	Leader Substitute – Deputy Leader	Cllr Karen May Sub: Cllr Sue Baxter	Cllr Karen May Sub: Cllr Sue Baxter
Local Councils Network	Leader Substitute – Deputy Leader	Cllr Karen May Sub: Cllr Sue Baxter	Cllr Karen May Sub: Cllr Sue Baxter
Local Government Association General Assembly	Leader Substitute – Deputy Leader	Cllr Karen May Sub: Cllr Sue Baxter	Cllr Karen May Sub: Cllr Sue Baxter
North Worcestershire Community Safety Partnership	Cabinet member	Cllr Peter Whittaker	Cllr Peter Whittaker
PATROL (Parking And Traffic Regulations Outside London) Adjudication Joint Committee	Portfolio Holder for Environmental Services Substitute:	Cllr Sue Baxter Sub: Cllr Peter Whittaker	Cllr Peter Whittaker Sub: Cllr Sue Baxter
West Midlands Employers	Portfolio Holder for Human Resources	Cllr Karen May	Cllr Karen May
West Midlands Employers Shareholder Board (established in 2024)	Leader, hold a cabinet role, or have a specific interest or expertise in the services of WME (2024-2028)	Cllr Karen May	Cllr Karen May

Agenda Item 16

Cabinet 17th June 2026

Organisation	Number of representatives and length of term	Appointed 2025/2026	Nominations 2026/2027
Worcestershire Health and Wellbeing Board	1 Rep for each council	Cllr Shirley Webb Sub: Cllr Sue Baxter	Cllr Shirley Webb Sub: Cllr Karen May
Worcestershire Local Enterprise Partnership (LEP)	One representative on behalf of the 3 North Worcestershire Councils – required by LEP constitution in 2025/26	Cllr Sharon Harvey (Redditch Borough Council) Sub: Cllr Karen May	Cllr Karen May (Bromsgrove District Council) Sub: Cllr Sue Baxter
Worcestershire Local Access Forum (Worcestershire County Council) BDC included on this forum from May 2025	1 representative from North Worcestershire District Councils. Term: 1 year (Note: Would be beneficial if the representative had a keen interest in countryside access and recreation issues.) No liability issues identified.	Councillor Robin Drew (Wyre Forest DC)	Cllr Karen May (Bromsgrove District Council) Sub: Cllr Matt Dormer

APPENDIX 2

COMMUNITY SERVICES			
1. Strategic Housing			
Subject	Detail	Delegated by:	Delegated to:
Discretionary Housing Assistance Grants.	To determine applications for Housing Assistance Grants under the Regulatory (Housing Assistance Grants) (England and Wales) Order 2002.	Cabinet/ Leader.	Strategic Housing Manager.
Home improvement Agency	To deal with day to day management of the Home Improvement Agency Service	Cabinet	Assistant Director of Community and Housing Services/ Strategic Housing Manager/Private Sector Team Leader
<u>General regulatory and enforcement activity for private sector housing (including Houses of Multiple Occupation)</u>	<u>1. To exercise all local authority regulation and enforcement functions under the legislation listed below:-</u> <u>Housing Act 1985</u> <u>Housing Act 1988</u> <u>Housing Act 2004 (and associated regulations)</u> <u>Housing and Planning Act 2016</u> <u>Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020</u> <u>Environment Protection Act 1990 section 79(1)(a)</u> <u>Building Act 1984</u> <u>Local Government (Miscellaneous Provisions) Acts 1976, 1982</u>	<u>1.</u>	Strategic Housing Manager

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To sign housing-related notices for houses in multiple occupation under the Housing Act 2004.¶¶
To inspect conditions under the Housing Health and Safety Rating System - Housing Act 2004.¶¶
To issue interim and final orders

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APPENDIX 2

	• <u>Prevention of Damage by Pests Act 1949</u> • <u>Public Health Act 1961</u> 2. To institute legal proceedings <u>for offences under the legislation listed above.</u> 3. To impose a financial penalty for an offence as an alternative to bringing a prosecution.		
			2 and 3 Strategic Housing Manager in consultation with Principal Solicitor
Housing Associations - Nominations.	To deal with the nomination where necessary of homeless applicants to housing association dwellings.	Cabinet/ Leader.	Strategic Housing Manager.
Housing Capacity Study.	To update the site details and housing figures in the Housing Capacity Study on an annual basis using data from the Housing Land Availability Study.	Cabinet/ Leader.	Strategic Housing Manager.
Housing Corporation Social Housing Grant.	To administer and approve applications and to authorise payment of local authority grant and Housing Corporation Grant under the Housing Corporation IMS System.	Cabinet/ Leader.	Strategic Housing Manager.
Housing Grants.	To determine applications for housing grants under the Housing Grants, Construction and Regeneration Act 1996.	Cabinet/ Leader.	Strategic Housing Manager.
Low Cost Housing.	1. To administer the Council's low cost housing scheme including the making of nominations and the sale of the Council's interest in dwellings.	1. Cabinet/ Leader.	1. Strategic Housing Manager. 2. Principal Solicitor.

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APPENDIX 2

	2. To take all necessary action including the institution of legal proceedings to recover deferred payments from the purchases of low cost homes who are in breach of covenants made in the purchase of low cost housing. 3. To revise fees in relation to low cost housing transactions.	2. Cabinet/ Leader. 3. Cabinet/ Leader.	3. Assistant Director of Legal, Democratic and Procurement Services, Assistant Director of Community and Housing Services and Financial Services Manager in consultation with the relevant Portfolio Holders.
Low-Cost Housing Capital Receipts <i>(New delegation agreed by Members in 2024/25)</i>	To approve individual proposals for new developments or the purchase of existing satisfactory dwellings and flipping Shared Ownership to affordable or social rented properties and the spend relating to these, as and when they were brought forward.	Council	The Assistant Director Community and Housing Services following consultation with the Portfolio Holder for Strategic Housing.
Mandatory Disabled Facilities Grant.	1. To determine applications for housing grants under the Housing Grants, Construction and Regeneration Act 1996. 2. To grant extensions of time of up to six months within which improvements are to be completed.	1. Cabinet/ Leader. 2. Cabinet/ Leader.	1. Strategic Housing Manager. 2. Assistant Director of Community and Housing Services.
Protection from Eviction Act.	<u>1. To institute legal proceedings in respect of illegal evictions and harassment under the provisions of the</u>	Cabinet/ Leader	<u>1 and 2</u> Assistant Director of Community & Housing Services in consultation

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APPENDIX 2

	Protection From Eviction Act 1977 and Housing Act 1988 (as amended by the Renters Right Act 2025). 2. To impose a financial penalty for an offence under section 1 of the Protection from Eviction Act (as amended) as an alternative to bringing a prosecution.		with Principal Solicitor.
Discrimination in the rental market	To take enforcement action under Chapter 3 of the Renters Rights Act 2025, including the imposition of financial penalties in accordance with the Councils Enforcement and Civil Penalties Notice Policy	Cabinet/ Leader	Assistant Director of Community and Housing Service
Stating the proposed rent and rental bidding	To take enforcement action under Chapter 6 of the Renters Rights Act 2025, including the imposition of financial penalties in accordance with the Councils Enforcement and Civil Penalties Notice Policy	Cabinet/Leader	Assistant Director of Community and Housing Service
Renters Rights Act 2025 – investigatory powers (Added following report on Renters Right Act in March 2026)	To exercise all powers in respect of entry, inspection, investigation, service of notices and other functions for the purposes of the following legislation: - Renters Rights Act 2025 sections 114 to 132 (investigatory powers) and section 110 (reporting to government)	Cabinet/ Leader	Assistant Director of Community and Housing Services] / [Housing Strategy Manager] / [Private Sector Housing Team Leader] / [Housing Strategy & Enabling Team Leader] / [Private Sector Housing Officer]

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Renters Rights Act 2025 Investigations (Added following report on Renters Right Act in March 2026)	To undertake investigations into potential offences under sections 33, 34, 39 and 56 of the Renters Rights Act 2025	Cabinet/ Leader	[Assistant Director ofCommunity and Housing Services] / [Housing Strategy Manager] / [Private Sector Housing Team Leader] / [Housing Strategy & Enabling Team Leader] / [Private Sector Housing Officer]	Formatted: Font: 12 pt Formatted: Font: 12 pt Formatted: Font: 12 pt Formatted: Font: 12 pt Deleted: Formatted: Font: 12 pt
Private Sector Housing Enforcement and Civil Penalty Policy	To update the Policy in line with any legislative or government guidance updates	Cabinet/ Leader	Assistant Director of Community and Housing Service following consultation with the Portfolio Holder for Housing	Formatted: Font: +Body (Aptos), Not Bold Formatted: Font: +Body (Aptos) Formatted: Font: 11 pt Formatted: Font: +Body (Aptos) Formatted: Indent: Left: 0 cm Formatted: Indent: Left: -0.1 cm, First line: 0 cm, Space After: 10 pt, Line spacing: Multiple 1.15 li, Tab stops: Not at 0.6 cm Formatted: Font: +Body (Aptos) Deleted: ¶ ¶ ¶ ¶ Formatted Table
Utilities - Restoration or Continuance of Services.	To deal in consultation with the relevant Portfolio Holder and generally in accordance with emergency procedures with applications received pursuant to the arrangements according to section 33 of the Local Government (Miscellaneous Provision) Act 1976 (Public Utility Services to Dwellings) and to take such action as may be necessary for the recovery of any payments made by the Council in pursuance of such arrangements.	Cabinet/ Leader.	Executive Director Finance or Assistant Director of Community and Housing Services	
Regulation of Mobile Home Sites	To institute legal proceedings under section 1 of the Caravan	Council	Strategic Housing Manager in	

APPENDIX 2

	Sites and Control of Development Act 1960 To take all steps to manage and regulate Mobile Home Sites, including the exercise of power of entry under the following legislation:- • Caravan Sites and Control of Development Act 1960 • <u>Caravan Sites Act 1968</u> • <u>Mobile Homes Act 2013</u>	Cabinet/Leader	consultation with the Principal Solicitor Strategic Housing Manager
Energy Efficiency (Private Rented Sector) (England & Wales) Regulations 2015	To implement enforcement powers under the Energy Efficiency (Private Rented Sector) (England & Wales) Regulations 2015	Cabinet	Assistant Director of Community and Housing Services
First Homes	To make amendments to Council's the First Homes Policy to reflect future Government guidance	Cabinet	Assistant Director of Community and Housing Services following consultation with the Portfolio Holder for Strategic Housing
Local Lettings Plan	To agree and adopt future Local Lettings Policies	Cabinet	Assistant Director of Community and Housing Services following consultation with the Portfolio Holder for Strategic Housing
Requisition for Information	To serve a requisition for information under section 16 of the Local Government (Miscellaneous Provisions Act 1976	Cabinet/Leader	Strategic Housing Manager
Boarding up of dangerous buildings	To serve notice under Section 9 of the Local Government	Cabinet/Leader	Strategic Housing Manager

APPENDIX 2

	(Miscellaneous Provisions) Act 1982		
Statutory Nuisance	To take all necessary action in relation to statutory nuisance under the Environmental Protection Act 1990.	Council	Strategic Housing Manager

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Member Questions

- 1. From Councillor S. Ammar**
Question for the Leader and Cabinet Member for Strategic Partnerships, Economic Development and Enabling

“Please could you provide an update on the development of the Council’s business prospectus, including when you expect it will be published?”

- 2. From Councillor J. Clarke**
Question for the Cabinet Member for Planning and Strategic Housing

“According to the Council’s own assessment, 17 Gypsy and Traveller pitches are needed by the end of 2028/29 and a further 20 over the period to 2029/2042. How many pitches have been provided since the last assessment?”

- 3. From Councillor S. Evans**
Question for the Cabinet Member for Environmental Services and Community Safety

“Could you please confirm why each ward is only due to have one visit from the road sweeper each year with some wards not now due another sweep until May 2027?”

- 4. From Councillor S. Robinson**
Question for the Cabinet Member for Health and Wellbeing, Leisure and Culture

“Please could you set out how the Council is planning to spend the £1.5m allocated in February’s budget to improving parks and playgrounds?”

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