

Dear Members

### **Cabinet**

A meeting of the Cabinet will be held on **Thursday 11 December 2025** at **6.30pm** in the **Craddock Room, Civic Centre, Riverside, Stafford** to deal with the business as set out on the agenda.

Please note that this meeting will be recorded.

Members are reminded that contact officers are shown at the top of each report and members are welcome to raise questions etc in advance of the meeting with the appropriate officer.



Head of Law and Governance

## **CABINET - 11 DECEMBER 2025**

**Chair - Councillor A T A Godfrey**

### **AGENDA**

- 1 Minutes of 18 November 2025 as circulated and published on 19 November 2025
- 2 Apologies
- 3 Councillors' Question Time (if any)
- 4 Proposals of the Cabinet Members (as follows):-

#### **Page Nos**

**(a) LEISURE PORTFOLIO**

- (i) Freedom Leisure Fees and Charges 2026 4 - 18

**(b) ECONOMIC DEVELOPMENT AND PLANNING PORTFOLIO**

- (i) Planning Enforcement Policy 19 - 38

**(c) CLIMATE ACTION AND NATURE RECOVERY PORTFOLIO**

- (i) Response to Notice of Motion - Protecting our Rivers and Oceans 39 - 54

**(d) RESOURCES PORTFOLIO**

- (i) Updated Strategic Risk Register 55 - 73
- (ii) Quarter 2 Performance Report for 2025-26 74 - 104
- (iii) Governance Improvement Plan - Progress Report for Quarter 2 2025-26 105 - 120
- (iv) Revenues and Benefits Collection Report - Quarter 2 - **PART CONFIDENTIAL** 121 - 129

**Report contains information relating to an individual, which is likely to reveal the identity of an individual and information relating to the financial or business affairs of any particular person (including the Council).**

## **Membership**

### **Chair - Councillor A T A Godfrey**

A T A Godfrey	- Leader
R Kenney	- Deputy Leader (Town Centres Regeneration Portfolio)
R P Cooke	- Resources Portfolio
I D Fordham	- Environment Portfolio
J Hood	- Community Portfolio
G P K Pardesi	- Leisure Portfolio
A N Pearce	- Climate Action and Nature Recovery Portfolio
A F Reid	- Economic Development and Planning Portfolio

**Agenda Item 4(a)i**

## **Freedom Leisure Fees and Charges 2026**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Head of Wellbeing
<b>Portfolio:</b>	Leisure Portfolio

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### **1 Purpose of Report**

- 1.1 The report seeks Cabinet approval for changes to Freedom Leisure's pricing structure for 2026, proposed by them and which is required in line with the terms of their contract with Stafford Borough Council.

### **2 Recommendations**

- 2.1 Cabinet is asked to approve the proposal from Freedom Leisure for an increase in fees and charges for leisure services, as set out in **APPENDIX 2**, with a breakdown in **APPENDIX 1**.

#### **Reasons for Recommendations**

- 2.2 The Council's leisure partner, Freedom Leisure, sets fees for its services in line with the contractual agreement. As part of this, any increases greater than the Consumer Price Index (CPI) plus 2% annually, require Cabinet consideration and approval.
- 2.3 An increase in fees greater than CPI+2% and detailed in **APPENDIX 1**, has been proposed by Freedom Leisure due to cost pressures particularly associated with pay and energy as described in their report, **APPENDIX 2**.
- 2.4 The price increase will have a neutral impact on the Council's financial position, but by supporting the leisure operator to maintain a healthy, viable business model with appropriate price increases, the Council's Medium Term financial interests are protected.

### 3 Key Issues

- 3.1 The Council entered into a contract in 2017 with Freedom Leisure to manage and operate the Council's leisure, culture and heritage facilities. These include Stafford Leisure Centre, Stone Leisure Centre, Rowley Park Stadium, the Gatehouse Theatre, the Ancient High House, Izaak Walton's Cottage and Stafford Castle; plus delivery of a number of leisure events throughout the year, including Stafford Half Marathon and the Christmas Lights switch on.
- 3.2 As part of this contract Freedom Leisure has the ability to make most operational and business decisions. However, there are certain contractual clauses which require additional approval by Cabinet for specific changes.
- 3.3 It is the responsibility of Freedom Leisure as the Council's operator to respond to external factors and set a pricing strategy for leisure services. It is necessary to maximise income to support the Council in ensuring that an attractive and equitable leisure offer is sustained, whilst contributing positively to the health and wellbeing of Borough residents. This is the first time since contract commencement in 2017, that an increase higher than CPI+2% is sought.
- 3.4 **APPENDIX 2** provided by Freedom Leisure sets out their case for their fee proposals and includes the schedule of proposed fees at **APPENDIX 1** for consideration and approval by the Cabinet.

### 4 Relationship to Corporate Priorities

- 4.1 The recommendation supports the Council to achieve its Corporate Priority for Communities and Wellbeing by contributing to *the opportunity for local people and communities to enjoy healthy lifestyles by providing good leisure and cultural services*.

### 5 Report Detail

- 5.1 Please see Freedom Leisure's proposal report in Appendix 2, and their breakdown of charges in **APPENDIX 1**.
- 5.2 The proposal is to raise fees and charges from January 2026, by an average of 6.9% overall. The contract allows for increases of CPI+2% annually. In January 2025 CPI was 3.8% and therefore an increase of 5.8% could have been applied without further approval. Freedom Leisure is seeking agreement to raise prices by a further 1.1%, to achieve the 6.9% overall average increase required.

## **6 Implications**

### **6.1 Financial**

The recommendation to approve the proposal to increase fees and charges under the contract operated by Freedom Leisure has a neutral impact on the Council's financial position.

The CPI figure at September 2025 stands at 3.8% with the additional 2% this would give an overall inflation figure without separate approval of 5.8%.

### **6.2 Legal**

Under the Stafford Borough Council Constitution, the Cabinet is empowered to make decisions on contractual management changes, provided these fall within the Council's approved policy and budget framework. This authority is delegated from Full Council through the Scheme of Delegation outlined in Part 3 of the Constitution.

The leisure operator concession contract was procured under the Concession Contracts Regulations 2016 (CCR 2016). Any change in the price to be charged by Freedom Leisure would be classed as a modification to the existing contract under the CCR 2016 and must comply with section 43 of the CCR 2016. The Contract currently provides for an annual price increase in line with CPI, plus 2%.

The proposed modification would fall within section 43(1)(5) of the CCR 2016, which permits modification of a concession contract where the value of the modification is below both (a) the threshold amount of £5,372,609 and (b) 10% of the value of the initial concession contract, which was estimated to be £80m (plus any indexation to date).

There would be an element of risk involved in allowing the price increase, as a challenge could be brought by a third party, however this risk is considered to be low.

The Contract currently provides for an annual price increase in line with CPI, plus an additional 2%. Any increase in excess of the additional 2% has to also be approved in writing by the Council (such approval not to be unreasonably withheld), in accordance with the terms of the Contract.

Under clause 76.4 of the Concession Contract, where any change to the terms of the contract are proposed by Freedom Leisure, and such change results in an increase in the sales revenue to be earned by Freedom Leisure, such a change should be reflected in a corresponding decrease in the subsidy paid by the Council to Freedom Leisure. The Council is not proposing to reduce the subsidy payable to Freedom Leisure, based on their appended report demonstrating increased operating costs; the uplifted fees and charges are not intended, or likely to produce increased profit. The proposal merely maintains financial viability and reducing the subsidy would undermine the intent of the proposed adjustment.

### **6.3 Human Resources**

None

### **6.4 Risk Management**

The Cabinet could choose not to approve the proposed fee increases. Freedom Leisure would still be able to increase prices by 5.8% as allowed under the contract, however this would lead to a shortfall within Freedom Leisure's budget from income. There is a potential risk that this necessitates possible reductions in services, staffing levels or operating hours to enable the business to continue within those funding constraints.

There is a risk that Freedom Leisure needs to negotiate a higher management fee from the Council or ultimately withdraw from the contract entirely resulting in all leisure operations being handed back to the Council to deliver at its own cost.

### **6.5 Equalities and Diversity**

The Council has a concessions policy which seeks to support those protected groups most affected by inequality, which considers the diverse needs of Borough residents, and which Freedom Leisure must implement. Fee increases may disproportionately affect low-income residents and those who rely on Council services due to affordability. Concessions remain in place, and these ensure that a lower price point is available for protected groups when compared with standard price points.

## 6.6 Health

Leisure and culture activities contribute positively to physical and mental health and wellbeing and play a key role in preventative health. Individuals impacted by fees and charges will see uplifts for things like swimming and full leisure centre memberships ranging from £0.30 to £2.20; box office booking fees per ticket at the Gatehouse are being reduced -£0.15. Clubs and community organisations utilising leisure services increase opportunities for group-based activities and social connection. These organisations may also face financial strain; however increased charges applied to groups can be distributed or shared between multiple members to reduce the impact on individuals.

## 6.7 Climate Change

The recommendation to increase fees and charges has a neutral impact on Climate Change. Investment in leisure assets to reduce energy consumption, such as the installation of solar panels at leisure centres during 2024-25 has a positive impact on the Council's aim to reduce carbon emissions. Energy prices have risen disproportionately to the savings effected by reductions in consumption, so whilst the Council's leisure operation can now be considered greener, energy remains the second largest cost to the operator.

## 7 Appendices

Appendix 1: Freedom Leisure's pricing list from 1 January 2026

Appendix 2: Freedom Leisure's annual price increase proposal report

## 8 Previous Consideration

None

## 9 Background Papers

None

**Contact Officer:** Sam Taylor

**Telephone Number:** 01785 619253

**Ward Interest:** N/A

**Report Track:** Cabinet 11 December 2025 (Only)

**Key Decision:** No



2025-26

Use if all prices  
increase by same %Add Individual %  
Below

Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Individual % Increase ££
Leisure	Swim	Adult	£6.80	£7.10	4.4%	£0.30
Leisure	Swim	Concession/Junior	£3.40	£3.55	4.4%	£0.15
Leisure	Exclusive Pool Hire - Per Hour	Adult	£136.00	£145.00	6.6%	£9.00
Leisure	Lifeguard/attendant - per hour	Adult	£21.90	£23.10	5.5%	£1.20
Leisure	Gala hire - per hour	Adult	£177.15	£190.00	7.3%	£12.85
Leisure	Badminton - Per Court	Adult	£11.90	£13.00	9.2%	£1.10
Leisure	Badminton - Per Court	Concession	£5.95	£6.50	9.2%	£0.55
Leisure	Squash per court	Adult	£10.20	£11.00	7.8%	£0.80
Leisure	Squash per court	Concession	£5.10	£5.50	7.8%	£0.40
Leisure	Indoor Bowls	Adult	£8.75	£9.50	8.6%	£0.75
Leisure	Indoor Bowls	Concession	£4.35	£4.75	9.2%	£0.40
Leisure	Fitness Suite	Adult	£10.20	£10.75	5.4%	£0.55
Leisure	Fitness Suite	Concession	£5.10	£5.40	5.9%	£0.30
Leisure	Equipment Hire - Squash/badminton	Adult	£2.00	£3.50	75.0%	£1.50
Leisure	Sports Hall - Full Hire	Adult	£95.35	£100.00	4.9%	£4.65
Leisure	Training Room/Meeting Room	Adult	£51.00	£54.00	5.9%	£3.00
Leisure	Shower and Change	Adult	£4.10	£5.00	22.0%	£0.90
			£559.25	£597.65	6.87%	

Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Annual New
Leisure	12 Month Pass - Swimming	Adult	£396.00	£415.00	4.8%	
Leisure	12 Month Pass - Swimming	Concession	£198.00	£207.50	4.8%	
All	Full Membership	Membership	£44.80	£47.00	4.9%	£470.00
All	Corporate and Concession Membership	Membership	£39.60	£41.40	4.5%	£414.00

Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Individual % Increase ££
Rowley Park	Full pitch	Peak	£77.40	£81.25	5.0%	£3.85
Rowley Park	School use	Peak	£26.55	£27.80	4.7%	£1.25
Rowley Park	Part pitch (one third)	Peak	£49.75	£52.00	4.5%	£2.25
Rowley Park	School use	Peak	£21.10	£22.15	5.0%	£1.05
Rowley Park	Full pitch	Off-Peak	£52.10	£54.70	5.0%	£2.60
Rowley Park	School use	Off-Peak	£26.55	£27.85	4.9%	£1.30
Rowley Park	Part pitch (one third)	Off-Peak	£38.80	£40.75	5.0%	£1.95
Rowley Park	School use	Off-Peak	£21.10	£22.15	5.0%	£1.05
Rowley Park	Athletics Track	Adult	£3.65	£4.00	9.6%	£0.35
Rowley Park	Athletics Track	Concession	£1.90	£2.00	5.3%	£0.10
Rowley Park	Bowls - Per hour	Adult	£5.80	£6.00	3.4%	£0.20
Rowley Park	Bowls - Per hour	Concession	£2.90	£3.00	3.4%	£0.10
Rowley Park	Bowls - Season Ticket	Adult	£96.20	£101.50	5.5%	£5.30
Rowley Park	Bowls - Season Ticket	Concession	£47.55	£50.75	6.7%	£3.20
Rowley Park	Bowls - Teams per session	Adult	£88.60	£93.50	5.5%	£4.90
Rowley Park	Bowls - Teams per session	Concession	£44.30	£46.75	5.5%	£2.45
Rowley Park	Bowls - Teams per season	Adult	£519.50	£548.00	5.5%	£28.50
Rowley Park	Bowls - Teams per season	Concession	£254.25	£274.00	7.8%	£19.75
Rowley Park	Bowls - Teams per season (alt weeks)	Adult	£254.30	£268.00	5.4%	£13.70
Rowley Park	Bowls - Teams per season (alt weeks)	Concession	£127.10	£134.00	5.4%	£6.90
Rowley Park	Bowls - Pavilion - Per Session	Adult	£17.40	£18.30	5.2%	£0.90
Rowley Park	Bowls - Pavilion - Per Season	Adult	£79.60	£84.00	5.5%	£4.40
Rowley Park	Bowls - Pavilion - Per Season	Concession	£165.70	£174.50	5.3%	£8.80
Rowley Park	Crazy Golf	Adult	£2.10	£3.00	42.9%	£0.90
Rowley Park	Crazy Golf	Concession	£1.05	£1.50	42.9%	£0.45
Rowley Park	Grass Pitches - Per Match (Football)	Adult	£86.20	£91.00	5.6%	£4.80
Rowley Park	Grass Pitches - Per Match (Football)	Concession	£47.50	£50.00	5.3%	£2.50
Rowley Park	Grass Pitches - Per Season per team (Football)	Adult	£585.60	£615.00	5.0%	£29.40
Rowley Park	Grass Pitches - Per Season per team (Football)	Concession	£292.80	£308.00	5.2%	£15.20
Rowley Park	Dressing Room Supplement - per match	Adult	£47.50	£50.00	5.3%	£2.50
Rowley Park	Dressing Room Supplement - per season, per team	Adult	£331.40	£350.00	5.6%	£18.60
Rowley Park	Room hire	Adult	£35.95	£38.00	5.7%	£2.05
Rowley Park	Tennis courts	Adult	£7.20	£7.60	5.6%	£0.40
Rowley Park	Tennis courts	Concession	£3.60	£3.80	5.6%	£0.20
Rowley Park	Multi-Games Area - Per Hour - With FL	Adult	£24.90	£26.25	5.4%	£1.35
Rowley Park	Multi-Games Area - Per Hour - Without FL	Adult	£6.95	£7.30	5.0%	£0.35
Total			£3,494.85	£3,688.40	5.5%	

Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Individual % Increase ££
AHH	Admission Charges		£0.00	£0.00		£0.00
AHH	Admission Charges - Groups	Adult	£5.65	£6.00	6.2%	£0.35
AHH	Guided - 15 minimum	Child	£3.96	£4.20	6.1%	£0.24
AHH	School visits - 15 minimum - Per Pupil	Schools	£5.40	£5.65	4.6%	£0.25
AHH	School visits - 25 minimum - Per Pupil	Schools	£5.40	£5.65	4.6%	£0.25
AHH	Admission Charges - Groups - Out of Hours	Adult	£7.30	£7.75	6.2%	£0.45
AHH	Guided - 15 minimum	Child	£5.40	£5.75	6.5%	£0.35
AHH	Room Hire - Per hour, any room (minimum 3 hours)	During visitors opening hours	£27.10	£28.00	3.3%	£0.90
AHH	Room Hire - Per hour, any room (minimum 3 hours)	Out of visitors opening hours	£59.95	£62.00	3.4%	£2.05
AHH	Weddings - Hire of Ancient High House only	Adult	£606.50	£645.00	6.3%	£38.50
AHH	Exhibitions held in Tudor Gallery - Per Week - (minimum of two weeks)		£65.65	£70.00	6.6%	£4.35

AHH	Exhibitions held in Rose Gallery - Per Week		£43.25	£46.00	6.4%	£2.75
AHH	Commission charge on sale of exhibits		£0.23	£0.20	-13.0%	-£0.03
AHH	Previews - per Hour (minimum 3 hours)	During visitors opening hours	£27.10	£28.75	6.1%	£1.65
AHH	Previews - per Hour (minimum 3 hours)	Out of visitors opening hours	£59.95	£63.50	5.9%	£3.55
AHH	Town Tours - Guided - 15 minimum	Tour of Stafford (History or Ghost Tour)	£5.45	£5.75	5.5%	£0.30
AHH	Town Tours - Guided - 15 minimum	Combined Tour - Tour of Stafford and	£8.20	£8.70	6.1%	£0.50
IWC	Admission - Guided 15 min	Adult	£5.45	£6.00	10.1%	£0.55
IWC	Admission - Guided 15 min	Child	£3.96	£4.20	6.1%	£0.24
IWC	School visits - 15 minimum - Per Pupil	Schools	£5.40	£5.65	4.6%	£0.25
IWC	Admission - Guided 15 min - Out of hours	Adult	£7.30	£7.75	6.2%	£0.45
IWC	Admission - Guided 15 min - Out of hours	Child	£5.40	£5.75	6.5%	£0.35
IWC	Room Hire - Per hour, any room (minimum 3 hours)	During visitors opening hours	£27.10	£28.00	3.3%	£0.90
IWC		Out of visitors opening hours	£59.95	£62.00	3.4%	£2.05
IWC	Weddings - Hire of Cottage only		£606.45	£645.00	6.4%	£38.55
Castle	Admission - Guided 15 min	Adult	£5.65	£6.00	6.2%	£0.35
Castle	Admission - Guided 15 min	Child	£3.96	£4.20	6.1%	£0.24
Castle	School Visits - 15 minimum	Per pupil - key stage 1 & 2	£5.65	£5.95	5.3%	£0.30
Castle	School Visits - 15 minimum	Per pupil - key stage 3 and above	£3.96	£4.15	4.8%	£0.19
Castle	Admission - Guided 15 min	Adult	£7.30	£7.75	6.2%	£0.45
Castle	Admission - Guided 15 min	Child	£5.40	£5.75	6.5%	£0.35
Castle	Room Hire - Per hour, any room (minimum 3 hours)	During visitors opening hours	£27.10	£28.00	3.3%	£0.90
Castle	Room Hire - Per hour, any room (minimum 3 hours)	Out of visitors opening hours	£59.95	£62.00	3.4%	£2.05
Castle	Birthday Parties		£102.15	£110.00	7.7%	£7.85
Castle	Stafford Castle Publication - Volume 1 The Survey 1978-1998		£27.10	£28.25	4.2%	£1.15
Castle	Stafford Castle Publication - Volume 2 The Excavations		£27.10	£28.25	4.2%	£1.15
Total			£1,932.82	£2,047.55	5.9%	
Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Individual % Increase ££
Gatehouse	Room Hire - Gatehouse					
	09.00-18.00		£112.60	£122.00	8.3%	£9.40
	18.00-24.00		£192.77	£209.00	8.4%	£16.23
	24.00-09.00		£260.50	£281.00	7.9%	£20.50
Gatehouse	Premium rate - Friday to Sunday (applies to external hire only)					
	09.00-18.00		£145.90	£152.00	4.2%	£6.10
	18.00-24.00		£249.05	£270.00	8.4%	£20.95
	24.00-09.00		£339.70	£368.00	8.3%	£28.30
Gatehouse	Malcolm Edwards Theatre					£0.00
	09.00-18.00		£41.70	£45.00	7.9%	£3.30
	18.00-24.00		£67.75	£75.00	10.7%	£7.25
	24.00-09.00		£112.55	£122.00	8.4%	£9.45
Gatehouse	Premium rate - Friday to Sunday (applies to external hire only)					£0.00
	09.00-18.00		£56.30	£62.00	10.1%	£5.70
	18.00-24.00		£90.65	£100.00	10.3%	£9.35
	24.00-09.00		£151.10	£165.00	9.2%	£13.90
Gatehouse	Theatre Bar					£0.00
	09.00-18.00		£41.70	£45.00	7.9%	£3.30
	18.00-24.00		£58.90	£65.00	10.4%	£6.10
	24.00-09.00		£82.20	£90.00	9.5%	£7.80
Gatehouse	Writers room					£0.00
	09.00-18.00		£32.85	£35.00	6.5%	£2.15
	18.00-24.00		£42.75	£45.00	5.3%	£2.25
	24.00-09.00		£61.25	£65.00	6.1%	£3.75
Gatehouse	Copeland Room		£16.95	£17.80	5.0%	£0.85
Gatehouse	Exhibition Space					£0.00
	Coffee Shop		£35.15	£40.00	13.8%	£4.85
	Bar		£35.15	£40.00	13.8%	£4.85
	Staircase		£35.15	£40.00	13.8%	£4.85
Gatehouse	Equipment/Technical Staff					£0.00
	Per hour per each person required		£25.55	£30.00	17.4%	£4.45
	Fire Marshall		£14.60	£15.50	6.2%	£0.90
Gatehouse	Deposits - (Weddings/Dinner Dances/ Parties etc.)		£97.45	£105.00	7.7%	£7.55
Gatehouse	*Stafford Gatehouse Summer School	Full	£338.70	£370.00	9.2%	£31.30
	*Stafford Gatehouse Summer School	2nd and subsequent children	£268.90	£280.00	4.1%	£11.10
	*Stafford Gatehouse Summer School	Concessions	£168.80	£185.00	9.6%	£16.20

Gatehouse	*Stafford Gatehouse Youth Theatre (SGYT)	Youth Theatre Training - 2hr session	£8.50	£10.00	17.6%	£1.50
		Reminder letter Admin Fee	£14.20	£15.00	5.6%	£0.80
Gatehouse	Photocopying - Black and White		£0.28	£0.30	7.1%	£0.02
Gatehouse	Photocopying - Colour		£0.54	£0.55	1.9%	£0.01
Gatehouse	Box Office					
Gatehouse	Commercial use - per performance					
	Gatehouse Theatre		£117.75	£127.00	7.9%	£9.25
	Malcolm Edwards Theatre		£43.80	£50.00	14.2%	£6.20
Gatehouse	Non-commercial use (amateur type) per performance					
	Gatehouse Theatre		£73.00	£80.00	9.6%	£7.00
	Malcolm Edwards Theatre		£43.80	£50.00	14.2%	£6.20
Gatehouse	Tickets supplied for external services/events					
	up to 250 tickets		£160.50	£175.00	9.0%	£14.50
	Over 250 tickets		£206.35	£230.00	11.5%	£23.65
Gatehouse	Commission for selling tickets for private lettings Commercial use - per performance - (or 10% of ticket sales, whichever is greater)		£101.60	£109.00	7.3%	£7.40
	Non-commercial use (amateur type) - Gatehouse Theatre		£42.75	£45.00	5.3%	£2.25
	Non-commercial use (amateur type) - Malcolm Edwards Theatre		£36.25	£38.50	6.2%	£2.25
	Client selling own merchandise		£0.23	£0.25	8.7%	£0.02
	Gatehouse staff selling Client merchandise		£0.23	£0.25	8.7%	£0.02
	Mailshot per item - 1st class		£1.65	£1.90	15.2%	£0.25
	Mailshot per item - 2nd class		£1.35	£1.50	11.1%	£0.15
	Box Office booking fee - per ticket		£3.15	£3.00	-4.8%	-£0.15
	Advertising performances in main body					
	MET		£2.25	£3.00	33.3%	£0.75
	Gatehouse		£2.25	£3.00	33.3%	£0.75
	Email design and format		£142.75	£155.00	8.6%	£12.25
	Per email		£0.01	£0.02	100.0%	£0.01
	Inclusion on monthly email		£31.00	£35.00	12.9%	£4.00
	Equipment Hire					
	Panto Dames/Uglies per week		£95.85	£105.00	9.5%	£9.15
	Panto Character Costumes per week		£79.20	£85.00	7.3%	£5.80
	Panto Dancer Sets per week		£55.25	£60.00	8.6%	£4.75
	General Costume Hire		£31.30	£35.00	11.8%	£3.70
	Thrust hire per event		£145.90	£160.00	9.7%	£14.10
	Orchestra stands					
	Lit Rat Stand with Light	per day	£7.25	£8.00	10.3%	£0.75
		per week	£14.40	£16.00	11.1%	£1.60
	Conductors Stand with Light	per day	£7.25	£7.80	7.6%	£0.55
		per week	£14.40	£16.00	11.1%	£1.60
	Instrument Stands	per day	£7.25	£7.50	3.4%	£0.25
		per week	£14.40	£16.00	11.1%	£1.60
	Grand Piano	per day	£158.40	£160.00	1.0%	£1.60
		per week	£526.25	£530.00	0.7%	£3.75
	Upright Piano	per day	£65.70	£70.00	6.5%	£4.30
		per week	£192.80	£200.00	3.7%	£7.20
	Yamaha P45 Electronic Piano	per day	£41.70	£45.00	7.9%	£3.30
		per week	£104.50	£115.00	10.0%	£10.50
	Tabletop Projector	per half day	£55.75	£60.00	7.6%	£4.25
		per day	£99.50	£110.00	10.6%	£10.50
		per week	£213.60	£231.00	8.1%	£17.40
	Barco Digital Projector	per day	£220.90	£240.00	8.6%	£19.10
		per week	£440.80	£470.00	6.6%	£29.20
	Tech Laptop	per day	£101.00	£110.00	8.9%	£9.00
	Lectern	per day	£28.70	£30.00	4.5%	£1.30
		per week	£50.00	£83.00	66.0%	£33.00
	Altair Wireless cans with 4 packs & headsets	per day	£152.15	£165.00	8.4%	£12.85
		per week	£232.40	£252.00	8.4%	£19.60
	Canford Audio Wired cans with 4 packs & headsets	per day	£51.05	£55.00	7.7%	£3.95
		per week	£73.00	£80.00	9.6%	£7.00
	Show Relay Camera	per day	£36.00	£40.00	11.1%	£4.00
		per week	£72.45	£75.00	3.5%	£2.55
	Total		£7,599.91	£8,209.87	8.0%	
	Full price list		£14,265.23	£15,254.37	6.93%	



## **Fees and Charges proposal**

**Core pricing:** Price Increase from 1st January 2026 – 31st December 2026



## **Background**

As we approach September 2025, we would like to begin preparations for the annual review of fees and charges, which we are proposing core pricing from 1<sup>st</sup> January 2026.

The usual contracted price increase mechanism is CPI+2%, in Jan 2025 CPI was at 3%, therefore 5% uplift allowed. The request is for an average 6.9% overall increase, which is only 1.9% above contractual agreement.

The contract is in its 8th year and this is the first time Freedom Leisure have needed to request more than the indexed increases provided for within the contract terms, the principle reasons for this are due to increased costs of staffing and energy.

As a not-for-profit organisation, we are committed to providing high-quality, accessible services that support the health and wellbeing of our communities. We've been working closely with you to ensure our pricing fairly reflects the inflationary pressures and external market forces beyond our control.

Moving away from traditional pricing models allows us to respond more effectively to changing economic conditions and continue investing in our people and services.

To maintain transparency, we will continue to highlight any significant macroeconomic factors that influence our operations and pricing decisions.

## **Increased People Costs**

We are a people-led organisation. Our purpose to improve lives through leisure is predicated on our colleagues supporting local communities to improve their physical, mental and social wellbeing. We invest heavily in our workforce, employing over 342 people; our people costs are our single biggest cost, representing over 48% of our cost base. Despite the current CPI inflation rate from January of 3%, high wage growth continues above 5% (5.3% in April 2025 as highlighted in Fig. 1 below) and continues from an 8.3% high in June 2023. With NLW in April 2025 increasing by a further 6.7% (Fig. 2), we need to reflect our rising cost base in customer pricing. The proposed price increase reflects a similar increase of 6.9% overall, in-line with increased people costs.

Figure 1: Wage Growth Jan 2023 – April 2025 Source - [AWE: Whole Economy Year on Year Three Month Average Growth \(%\): Seasonally Adjusted Total Pay Excluding Arrears - Office for National Statistics](#)

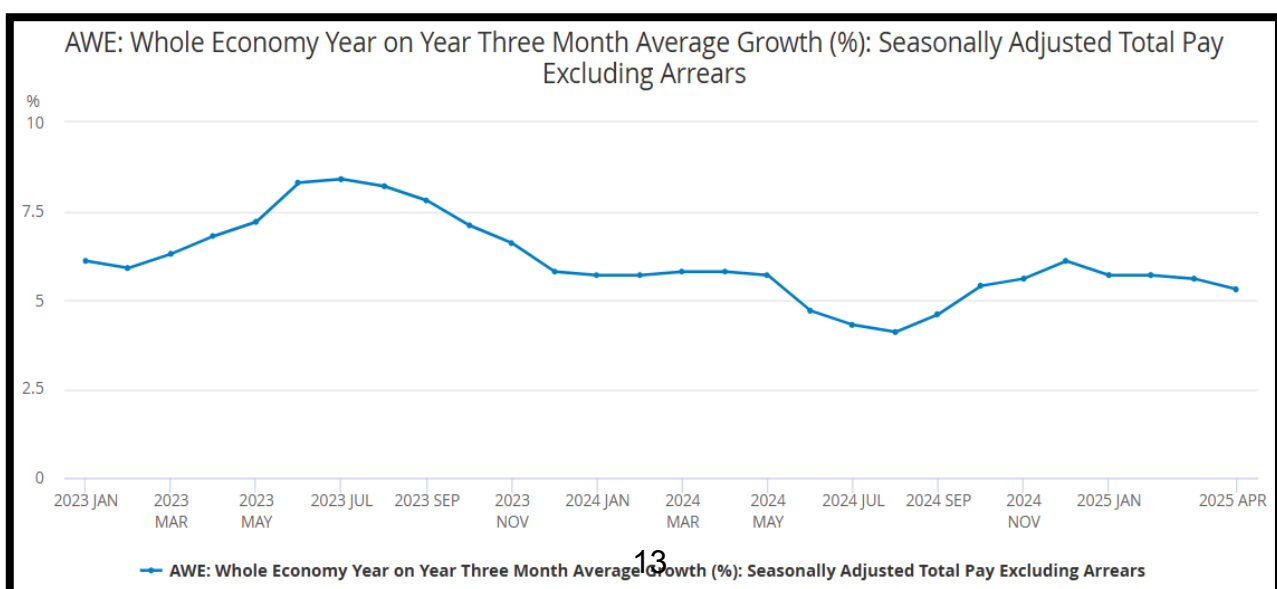
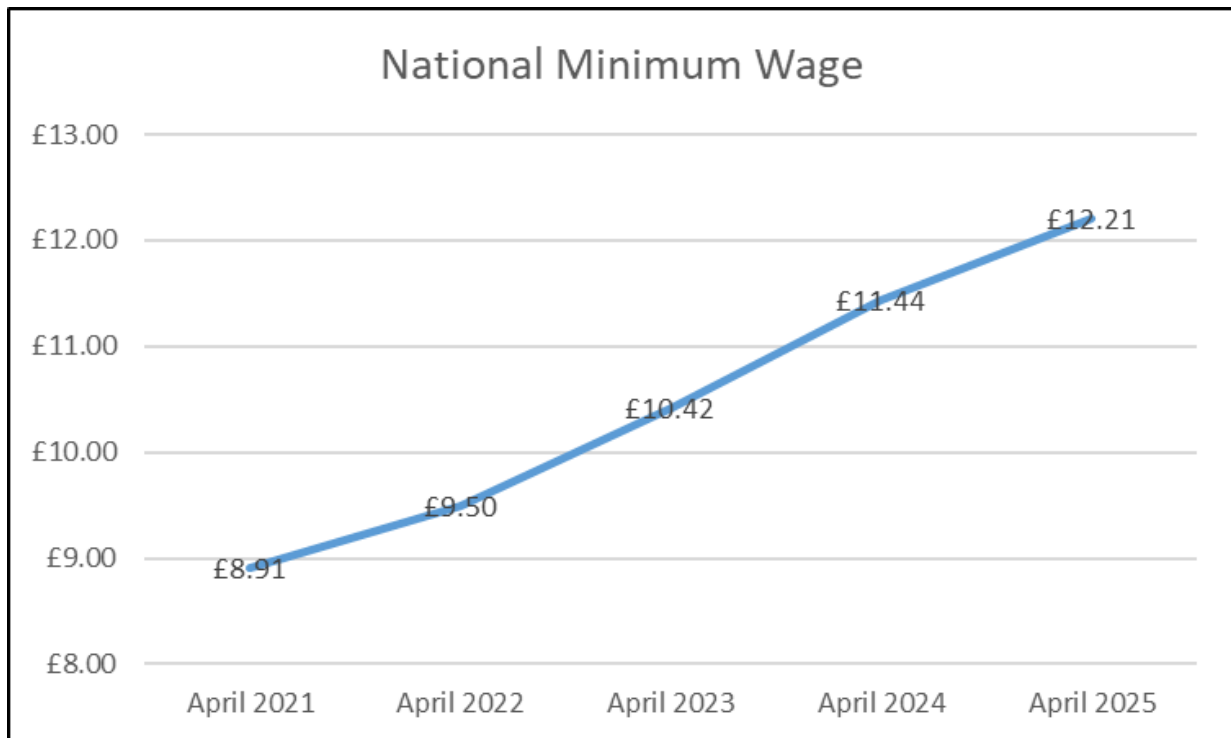


Figure 2: Actual National Minimum Wage rates, 2021-2025



### Increased Energy Costs

Energy remains our second largest cost, and while we have made significant strides in reducing consumption in recent years, market rates have risen sharply.

While it's widely acknowledged that factors such as COVID-19, the war in Ukraine, and other unpredictable global events—beyond our control—have contributed to significant market volatility, it's important to highlight their impact.

Energy prices have escalated disproportionately in recent years, to the extent that the current contract mechanism of CPI + 2% is no longer sufficient to absorb or offset these increases.

As a result, our current energy costs have more than doubled in recent years and are now projected to account for approximately **11.5%** of our total cost base for 2025/26 across the group.

The information we've seen recently suggests that our energy costs next year, if consumption doesn't change, could be around **10%** higher than this year.

Over the recent year actions have been taken to reduce our overall consumption, with Stafford Leisure Centre and Stone Leisure Centre both installing wide arrays of Solar, providing large reductions in overall consumption.

Whilst reducing our energy consumption can be seen as positive this can also bring negative impacts also with the fact the more we reduce our consumption, the higher our blended unit rate (energy bill £/kWh) actually becomes.

## Pricing Approach

Based on the above factors the current contractual annual 2% + CPI% pricing approach will not mitigate against the cost pressures.

There is a strong case present for above-contractual increases due to the significant wage inflation pressures on our people-led services. This report includes a breakdown of fees, charges, the % variance and the £ value of increase per item

The Strategic Partnership Plan includes a full review of the existing fees and charges lists and process for setting prices with an aim to see this sit outside of the overall council price lists. This would allow for a more flexible approach to meet market demand and a consolidated list of core prices to be agreed.

In January 2025 CPI was 3%; the proposed price list shows a variety of increase above CPI +2% with an overview on all pricing considered.

The proposed increase is an average of **6.9%** across the Stafford partnership. This request is **1.9%** above the agreed CPI +2%

## Outdoor Leisure

The prices for the outdoor leisure facilities including football pitches, the bowling green and tennis courts are proposed to be increased as per below. SBC increase timelines have changed from January annual too April, however we remain proposing the increase to be in place for January 2026.

Overall the proposed increase is an average of **5.5%** increase in line with the contractual agreement.

It is worth noting that the 2 large % increases relate to crazy golf increases, however these are only increases of 45p and 90p.

Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Individual % Increase ££
Rowley Park	Full pitch	Peak	£77.40	<b>£81.25</b>	5.0%	£3.85
Rowley Park	School use	Peak	£26.55	<b>£27.80</b>	4.7%	£1.25
Rowley Park	Part pitch (one third)	Peak	£49.75	<b>£52.00</b>	4.5%	£2.25
Rowley Park	School use	Peak	£21.10	<b>£22.15</b>	5.0%	£1.05
Rowley Park	Full pitch	Off -Peak	£52.10	<b>£54.70</b>	5.0%	£2.60
Rowley Park	School use	Off -Peak	£26.55	<b>£27.85</b>	4.9%	£1.30
Rowley Park	Part pitch (one third)	Off -Peak	£38.80	<b>£40.75</b>	5.0%	£1.95
Rowley Park	School use	Off -Peak	£21.10	<b>£22.15</b>	5.0%	£1.05
Rowley Park	Athletics Track	Adult	£3.65	<b>£4.00</b>	9.6%	£0.35
Rowley Park	Athletics Track	Concession	£1.90	<b>£2.00</b>	5.3%	£0.10
Rowley Park	Bowls - Per hour	Adult	£5.80	<b>£6.00</b>	3.4%	£0.20
Rowley Park	Bowls - Per hour	Concession	£2.90	<b>£3.00</b>	3.4%	£0.10
Rowley Park	Bowls - Season Ticket	Adult	£96.20	<b>£101.50</b>	5.5%	£5.30
Rowley Park	Bowls - Season Ticket	Concession	£47.55	<b>£50.75</b>	6.7%	£3.20
Rowley Park	Bowls - Teams per session	Adult	£88.60	<b>£93.50</b>	5.5%	£4.90
Rowley Park	Bowls - Teams per session	Concession	£44.30	<b>£46.75</b>	5.5%	£2.45
Rowley Park	Bowls - Teams per season	Adult	£519.50	<b>£548.00</b>	5.5%	£28.50
Rowley Park	Bowls - Teams per season	Concession	£254.25	<b>£274.00</b>	7.8%	£19.75
Rowley Park	Bowls - Teams per season (alt weeks)	Adult	£254.30	<b>£268.00</b>	5.4%	£13.70
Rowley Park	Bowls - Teams per season (alt weeks)	Concession	£127.10	<b>£134.00</b>	5.4%	£6.90
Rowley Park	Bowls - Pavilion - Per Session	Adult	£17.40	<b>£18.30</b>	5.2%	£0.90
Rowley Park	Bowls - Pavilion - Per Season	Adult	£165.70	<b>£174.50</b>	5.3%	£8.80
Rowley Park	Bowls - Pavilion - Per Season	Concession	£79.60	<b>£84.00</b>	5.5%	£4.40
Rowley Park	Crazy Golf	Adult	£2.10	<b>£3.00</b>	42.9%	£0.90
Rowley Park	Crazy Golf	Concession	£1.05	<b>£1.50</b>	42.9%	£0.45
Rowley Park	Grass Pitches - Per Match (Football)	Adult	£86.20	<b>£91.00</b>	5.6%	£4.80
Rowley Park	Grass Pitches - Per Match (Football)	Concession	£47.50	<b>£50.00</b>	5.3%	£2.50
Rowley Park	Grass Pitches - Per Season per team (Football)	Adult	£585.60	<b>£615.00</b>	5.0%	£29.40
Rowley Park	Grass Pitches - Per Season per team (Football)	Concession	£292.80	<b>£308.00</b>	5.2%	£15.20
Rowley Park	Dressing Room Supplement - per match	Adult	£47.50	<b>£50.00</b>	5.3%	£2.50
Rowley Park	Dressing Room Supplement - per season, per team	Adult	£331.40	<b>£350.00</b>	5.6%	£18.60
Rowley Park	Room hire	Adult	£35.95	<b>£38.00</b>	5.7%	£2.05
Rowley Park	Tennis courts	Adult	£7.20	<b>£7.60</b>	5.6%	£0.40
Rowley Park	Tennis courts	Concession	£3.60	<b>£3.80</b>	5.6%	£0.20
Rowley Park	Multi-Games Area - Per Hour - With FL	Adult	£24.90	<b>£26.25</b>	5.4%	£1.35
Rowley Park	Multi-Games Area - Per Hour - Without FL	Adult	£6.95	<b>£7.30</b>	5.0%	£0.35



## Leisure

The prices for the leisure facilities including court hire, swimming and fitness suite usage proposed to be increased as per the below. A full competitor analysis has been carried out.

Overall the proposed increase is an average of **6.87%** increase.

To note equipment hire has increased over a large %, this is due to the rising cost in replacement equipment.

Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	Individual % Increase ££
Leisure	Swim	Adult	£6.80	<b>£7.10</b>	4.4%	£0.30
Leisure	Swim	Concession/Junior	£3.40	<b>£3.55</b>	4.4%	£0.15
Leisure	Exclusive Pool Hire - Per Hour	Adult	£136.00	<b>£145.00</b>	6.6%	£9.00
Leisure	Lifeguard/attendant - per hour	Adult	£21.90	<b>£23.10</b>	5.5%	£1.20
Leisure	Gala hire - per hour	Adult	£177.15	<b>£190.00</b>	7.3%	£12.85
Leisure	Badminton - Per Court	Adult	£11.90	<b>£13.00</b>	9.2%	£1.10
Leisure	Badminton - Per Court	Concession	£5.95	<b>£6.50</b>	9.2%	£0.55
Leisure	Squash per court	Adult	£10.20	<b>£11.00</b>	7.8%	£0.80
Leisure	Squash per court	Concession	£5.10	<b>£5.50</b>	7.8%	£0.40
Leisure	Indoor Bowls	Adult	£8.75	<b>£9.50</b>	8.6%	£0.75
Leisure	Indoor Bowls	Concession	£4.35	<b>£4.75</b>	9.2%	£0.40
Leisure	Fitness Suite	Adult	£10.20	<b>£10.75</b>	5.4%	£0.55
Leisure	Fitness Suite	Concession	£5.10	<b>£5.40</b>	5.9%	£0.30
Leisure	Equipment Hire - Squash/badminton	Adult	£2.00	<b>£3.50</b>	75.0%	£1.50
Leisure	Sports Hall - Full Hire	Adult	£95.35	<b>£100.00</b>	4.9%	£4.65
Leisure	Training Room/Meeting Room	Adult	£51.00	<b>£54.00</b>	5.9%	£3.00
Leisure	Shower and Change	Adult	£4.10	<b>£5.00</b>	22.0%	£0.90
			<b>£559.25</b>	<b>£597.65</b>	<b>6.87%</b>	
Facility	Activity	Category	Current Price	New Price Individual Amount	Individual %	
Leisure	12 Month Pass - Swimming	Adult	<b>£396.00</b>	<b>£415.00</b>	4.8%	This includes swimming pool usage
Leisure	12 Month Pass - Swimming	Concession	<b>£198.00</b>	<b>£207.50</b>	4.8%	
All	Full Membership	Membership	<b>£44.80</b>	<b>£47.00</b>	4.9%	Full membership includes, gym, pool and group exercise classes
All	Corporate and Concession Membership	Membership	<b>£39.60</b>	<b>£41.40</b>	4.5%	

## Gatehouse Theatre

The existing fees and charges are historic and extensive including everything from photocopying to costume hire.

These prices have been set to increase by an average of **7.6%**.

There are proposed increases above **7.6%** in relation to certain services or products, these products are proposed to increase greater than this % due to the rise in associated costs for example the hire of technical staff on an hourly basis has increased due to the rise in overall people cost detailed at the beginning of this report. There are other prices that are proposed to rise by higher % due to the cost in the expenditure associated with these.

The increase has not been flatly applied to the products, consideration has been made per product, in line with industry levels, competitor analysis and current figures. Due to the extensive list of pricing the full pricing list can be found in **Appendix I**

## **Heritage Sites**

The core prices for the Heritage sites are for the school tours, we are proposing an increase in line with the contractual agreement, with the pricing of school tours to support the challenging market of school funding and to ensure that tours remain accessible to schools. Tours last for a full school day and are delivered by our knowledgeable Heritage Guides.

On average the Heritage pricing is proposed to increase by **5.9%**  
Full list of Heritage pricing can be found in **Appendix I**

## **Recommendation**

The pricing proposals outlined support the partnership in meeting the prescribed contract management fee and income lines. This pricing proposal will maximise income and increase the overall contract performance, whilst aligning the pricing with current industry pricing across Leisure, Culture and Heritage, supporting the requirement of sustainability.

The full list of pricing can be found in **Appendix I**

It is recommended that the pricing proposals be agreed and set from **1 January 2026**

**Agenda Item 4(b)i**

## **Planning Enforcement Policy**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Head of Economic Development and Planning
<b>Portfolio:</b>	Economic Development and Planning

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### **1 Purpose of Report**

- 1.1 To request authority to implement a new Planning Enforcement Policy for Stafford Borough Council to be applied at a time to be agreed between the Head of Economic Development and Planning in conjunction with the Cabinet Member for Economic Development and Planning.

### **2 Recommendations**

- 2.1 That Cabinet agree and adopt the Planning Enforcement Policy 2025 (as set out in **APPENDIX 1**).
- 2.2 That Cabinet agree to delegating the date of implementation to the Head of Economic Development and Planning in consultation with the Cabinet Member for Economic Development and Planning.
- 2.3 That Cabinet agree to delegate approval of minor amendments to the Enforcement Policy to the Head of Economic Development and Planning in consultation with the Cabinet Members for Economic Development and Planning.

#### **Reasons for Recommendations**

- 2.4 The recommendations in the report are necessary to introduce a new and efficient approach to planning enforcement within the Borough. The policy will promote good practice and facilitate the prioritisation of investigations of breaches of planning control. This should enable a better alignment of resources to the demands placed on the service for the benefit of service users.

### **3 Key Issues**

- 3.1 The Enforcement Team carries a large workload that places a significant demand on resources. The team's capacity is hindered by the volume of cases requiring investigation and leaves little time to allow prioritisation that would allow efficient caseload management.
- 3.2 The Council receives a high number of complaints relating to alleged breaches of planning control. The lack of an up-to-date and clear policy is contributing to the handling of the volume of complaints received. Clear guidance would be helpful to set out the type and nature of complaints that would be taken forward for investigation and those that would not require further investigation. This would allow the prioritisation of limited staff resources to those cases where the greatest harm is experienced.

### **4 Relationship to Corporate Priorities**

- 4.1 The Development Management and Planning Policy services are key statutory services and contribute to the delivery of the Council's corporate priorities:

Priority 1 - Prosperous Economy. Creating the right conditions for economic growth and prosperity.

Priority 2 - Communities and Wellbeing. A safe and secure place to live for local people. A safe and cohesive borough and reduction in health inequalities.

Priority 3 - Climate Change, Nature Recovery and the Environment. Promote nature recovery, climate change resilience, public areas that are clean and tidy as well as improved public open spaces, play areas, parks and landscapes.

Priority 4 - Effective Council. Good customer experience and value for money for taxpayers.

### **5 Report Detail**

- 5.1 The Development Management Service is currently implementing an improvement plan that covers all elements of the service from pre-application, validation, assessment of applications, determination of applications, appeals, planning enforcement and process/systems.
- 5.2 As reported to Cabinet in November 2024, Planning Enforcement is a discretionary service. It is not compulsory for an LPA to act against a breach of planning control or to take further action due to the wide nature of complaints. However, the service has a high profile and there is an

expectation that the Council will investigate potential breaches of planning action and act where it is expedient and deemed to be in the public interest.

- 5.3 The Planning Enforcement Policy currently on the Stafford Borough Councils website is dated July 2015 and an update is considerably overdue.
- 5.4 The planning system operates to regulate development and the use of land in the public interest. The effective and proper enforcement of planning controls is essential to protect the local environment and interests of the residents, visitors and businesses from the harmful effects of unauthorised development. The Council has a duty to investigate alleged breaches of planning control. A breach of planning control broadly means the carrying out of development or change of use of a building or dwelling without the grant of planning permission from the Council or deemed permission by government order. A breach will also include the carrying out of development without compliance with the approved plans or any conditions attached to a planning permission. Unauthorised works to listed buildings, trees covered by Tree Preservation Orders, trees within a Conservation Area and advertisements also come within the scope of planning control, but unlike the breaches identified above constitute a criminal offence. The Council also investigates offences under the Hedgerows Regulations 1997 and High Hedge complaints under Part 8 of the Anti-social Behaviour Act 2003.
- 5.5 The main objectives of planning enforcement are:
- (a) To remedy undesirable effects of unauthorised development
  - (b) To bring unauthorised activity under control to ensure that the credibility of the planning system is not undermined.
- 5.6 The Council's enforcement powers are discretionary and will only be exercised when it is considered expedient to do so. In considering the issue of expediency, the Council will have regard to:
- whether the breach of planning control unacceptably harms public amenity, or the existing use of land and buildings merit protection in the public interest.
  - ensuring any enforcement action is commensurate with the breach of planning control to which it relates. Enforcement action will not normally be taken to remedy trivial or technical breaches of control which are considered to cause no harm to amenity. For example, work that is slightly larger than Permitted Development Rights allow for.
  - ensuring that, if initial attempts to persuade an owner or occupier of a site to voluntarily remedy the harmful effects of unauthorised development fail, negotiations should not be allowed to hamper or delay whatever formal enforcement action may be required to make the development acceptable on planning grounds, or to compel it to stop.
  - statutory time limits for taking enforcement action.

- relevant planning policies and other material considerations.
- 5.7 The demands on the enforcement service are such that alleged breaches of planning control will need to be prioritised to align with the current resources available. Current caseloads are not sustainable and this is partly due to the current policy which is too general and ambiguous. To make the most effective use of available resources, the Councils will investigate alleged breaches of planning control in accordance with set priorities. The priorities take into account the significance and impact of the breach, the level of harm caused and also the need to react expediently. The Councils should not investigate every complaint received but only take forward those where harm has been assessed and enforcement action may be necessary.
- 5.8 Reporting an alleged breach will need to accord with a set standard requiring
- Name and contact details of complainant. Anonymous complaints will not be accepted.
  - The exact location of the site.
  - A description of the activity or development.
  - The date it began (if known).
  - The date work has completed (if known).
  - Details of harm (such as noise, visual impact or safety issues)
  - Photographs or supporting evidence
- 5.9 The identity of complainants is confidential. Where complainants are not willing to provide details, they can be requested to speak to their ward member.
- 5.10 The Enforcement Policy proposes a two-stage assessment process where the initial assessment considers the nature of the breach as well as harm experienced and a score assigned during the two-step assessment. These two tables are used in conjunction, for example, untidy land (1) that has been causing an issue for more than 6 months (1) and causes a highway safety issue (2) would score 4 overall. If a case scores 3 or more, an investigation will take place, and the case will progress to Tier 2. There may be negotiations as part of the initial investigation, to remedy the breach.
- 5.11 At the second stage the impact will be scored against an Expediency Assessment identifying whether the impact is low, medium or significant harm. A cumulative score will indicate whether the case proceeds to an investigation, or no further action and the complainant will be advised that the Council will close the case. Cases that go forward to investigation will be prioritised as high, medium, lower and low priority which will dictate the timescale for investigation.

Table 1: Initial Assessment

Low Harm – 1 point	Medium harm – 2 points	Significant harm – 3 points
Unauthorised signage and advertisements	Unauthorised development that would adversely affect the character and appearance of a conservation area or the setting of a listed building	Unauthorised works to a listed building or ancient monument
Unauthorised telecommunications equipment or satellite dishes on residential dwellings	Development of poor-quality housing, including large houses of multiple occupancy, flat conversions and residential use of outbuildings	Development/changes of use with serious implications upon the continued health and wellbeing of the public in Stafford or Cannock.
Unauthorised fences, walls and gates	Unauthorised telecommunications equipment not on a dwelling	Large scale development where a serious impact is felt over a wide area
Any breach of planning control which is temporary in nature	Breaches of planning conditions that result in harm to general amenity	Unauthorised works in progress to a tree protected by a tree preservation order or tree within a conservation area
Untidy land	Residential extensions that do not benefit from permitted development rights	

Descriptor	0	1	2
Is the breach in a conservation area?	No	Yes	
Is the breach in the greenbelt?	No	Yes	
Has the untidy land been causing an issue for more than 6 months?	No	Yes	
Does this require a site visit to determine the extent, prominence, scope or scale of the breach?	No		Yes

Is there a highway safety issue?	No		Yes
Is there a tree preservation order breach?	No	Yes	
Is this a statutory listed building?	No	Yes	

Table 2: Expediency Assessment

<b>Significant harm = 3 points</b>	There is a serious harmful impact on the built environment or a serious impact on public health or amenity. It is not considered that planning consent would be granted.
<b>Medium harm = 2 points</b>	There is some impact on the built environment or some impact on public health or amenity. In cases where there is medium harm in some instances planning consent may not be granted. However, insufficient harm is caused by the development to warrant formal action. This will be based on experience and the likelihood of success at appeal of any enforcement proceedings.
<b>Low harm = 1 point</b>	There is a small impact on the built environment or a small impact on public health or amenity. In these cases, planning permission would likely be granted.
<b>No harm = 0 points</b>	There is no harm.

- 5.12 If a breach is confirmed and negotiation does not resolve the issue, officers assess whether formal enforcement is expedient. This involves considering the level of planning harm caused and the likelihood of success if enforcement action is taken. A breach that scores 3 (significant harm) in any area will usually proceed directly to enforcement. If no individual issue scores 3, but the total score is 4 or more, enforcement is likely to be considered. If the cumulative score is 3 or below, no further action will be taken.



- 5.13 It is proposed to formally apply the new Enforcement Policy when workloads have reduced, however case prioritisation will be carried out immediately once the policy is approved. It is envisaged the new policy will formally be introduced at some stage in 2026, although this is dependent on retaining the current team of enforcement officers to reduce the backlog of cases. Each time an officer leaves, it results in a rise in the backlog of cases and delays while replacements are recruited.
- 5.14 There will be occasions where cases will bypass the enforcement policy whereby immediate action is necessary such as when a temporary stop notice or temporary injunction is required to deal with a serious breach.

## **6 Implications**

### **6.1 Financial**

There are no direct financial implications for the Council as a result of this Policy report.

### **6.2 Legal**

None

### **6.3 Human Resources**

None

### **6.4 Risk Management**

The main risks associated with not having a Local Enforcement Policy in place are:

- Backlog of cases continue to grow.
- Lack of transparency in managing enforcement caseload and prioritisation.
- Lack of effective case management.
- Failure to make best use of planning enforcement resources.

The Enforcement Policy will ensure that breaches of planning control are investigated in accordance with good practice and legislation.

Case prioritisation will be carried out within the framework of the new policy and those cases causing greatest harm will be prioritised.

The policy will provide a transparent process to decision making and case prioritisation. This will also provide an audit trail of decisions linked to the policy.

Case management will be more efficient allowing cases to be triaged and not immediately added to the caseload (or backlog) for investigation. Only those cases that pass through the initial assessment will be taken forward to investigation.

Through the introduction of the Enforcement Policy, the residual risks are seen as low.

## **6.5 Equalities and Diversity**

None

## **6.6 Health**

None

## **6.7 Climate Change**

None

## **7 Appendices**

Appendix 1: Planning Enforcement Policy

## **8 Previous Consideration**

Cabinet 7 November 2024 - Development Management Action Plan and Resources Request 2024/25 - Minute No CAB34/24

## **9 Background Papers**

Appendix 1 - Planning Enforcement Policy

**Contact Officer:** Sushil Birdi

**Telephone Number:** 01543 464326

**Ward Interest:** All

**Report Track:** Cabinet 11 December 2025 (Only)

**Key Decision:** Yes

# Planning Enforcement Policy

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## Appendix 1

### For Stafford Borough Council and Cannock Chase District Council

Draft - September 2025

#### 1. Introduction

This Planning Enforcement Policy sets out how Stafford Borough Council and Cannock Chase District Council will investigate and respond to suspected breaches of planning control. It supports the councils' shared enforcement team in delivering a consistent, proportionate and transparent service for residents, businesses and communities. Effective enforcement is important to maintain public confidence in the planning system. Although enforcement action is discretionary, this policy explains how both councils will decide what action to take, based on the level of harm and what is in the public interest.

Stafford and Cannock now operate a shared planning enforcement team. However, each council still has its own planning committees, decision-making structures and delegation arrangements. Where these differ, the policy clearly indicates which council a particular procedure applies to.

This document is based on national guidance, including the National Planning Policy Framework (NPPF), relevant legislation, and examples of good enforcement practice from across the country.

#### 2. What Is Planning Enforcement?

Planning enforcement is about making sure that development happens in line with national legislation, local planning policies and any conditions attached to planning permissions. It plays a key role in protecting the local environment and ensuring a fair and lawful planning system.

Most breaches of planning control are not criminal offences. However, enforcement action can be taken where development has occurred without the correct permission, or where planning conditions have not been followed.

Some types of unauthorised development are considered criminal offences from the outset. These include:

- Carrying out unauthorised works to a listed building
- Carrying out works to trees protected by a Tree Preservation Order (TPO), or to trees within a Conservation Area
- Displaying advertisements without the required consent

All other breaches are treated as civil matters unless a formal Enforcement Notice is served and not complied with, which then becomes a criminal offence.

### 3. What Is a Breach of Planning Control?

A breach of planning control can include:

- Building or engineering works that do not have planning permission
- A material change of use of land or buildings without permission
- Not following the approved plans or conditions attached to a planning permission
- Failing to comply with planning obligations
- Unauthorised works to listed buildings or protected trees
- Displaying advertisements without consent
- Land or buildings left in an untidy condition where this harms local amenity

Planning enforcement time limits vary: a 10-year period applies to most development and use changes on or after April 25, 2024, while a 4-year period applies only to such breaches completed before that date. There is no time limit for breaches of listed building legislation, and some situations, like deliberate concealment, can extend these periods.

In rare cases where development has been deliberately concealed, the council may apply for a Planning Enforcement Order to allow late action.

### 4. What We Can and Cannot Investigate

We will investigate alleged breaches of planning control that fall within our legal powers and planning responsibilities. These include:

- Unauthorised building works or extensions
- A change of use of land or buildings
- Works to protected trees
- Works to listed buildings
- Untidy land that significantly affects the amenity of the area
- Development not in line with approved plans or planning conditions
- Unauthorised signs or advertisements
- Demolition in a Conservation Area without consent

There are some matters we cannot investigate through planning enforcement, such as:

- Neighbour disputes about land ownership or boundaries
- Breaches of private covenants or deeds
- Parking of vehicles on the highway or verges (this is a County Council or Police matter)
- Party wall issues or building control concerns
- Business activity from home where there is no clear harm or material change of use
- Issues of noise, smell, anti-social behaviour or pollution (these are investigated by Environmental Health or other agencies)
- Works that have planning permission or fall under permitted development rights

Where a concern falls outside the scope of planning enforcement, we will try to redirect it to the appropriate team or agency.

## 5. How to Report a Breach of Planning Control

You can report a suspected breach of planning control using the councils' online forms.

Providing clear and detailed information helps us to investigate the matter more efficiently.

When you report a breach, we require:

- Your name and contact details. Anonymous complaints will not be accepted.
- The exact location of the site
- A description of the activity or development you are concerned about
- The date it began (if known)
- Any harm you believe it is causing (such as noise, visual impact or safety issues)
- Any photographs or supporting evidence you may have

Both councils treat the identity of complainants in confidence. However, if a case proceeds to appeal or prosecution, you may be asked to provide a witness statement or attend a hearing. We will always discuss this with you first.

## 6. Confidentiality

All enforcement enquiries are treated confidentially. Your name and contact details will not be shared with the person or organisation under investigation. If your evidence is essential to the case and a formal appeal or legal action is required, we will contact you to discuss whether you are willing to be involved.

To assist in our investigation, you may be asked to complete a diary sheet of times and dates when you notice the alleged breach occurring, as part of your normal day to day activities. This is to assist the Council in planning effective visits and help demonstrate the intensity and impact of a suspected breach of planning control.

## 7. Assessing Harm and Deciding Whether to Act

The shared enforcement team uses a two-stage assessment to decide whether a breach should be formally investigated and, if necessary, whether enforcement action is justified. This includes a harm scoring system to ensure consistency and fairness.

### Tier 1 – Initial Assessment

Each case is first assessed against a set of questions to understand the type and level of harm involved. Points are allocated based on the nature and location of the breach.

These two tables are to be used in combination. For example, untidy land (1) that has been causing an issue for more than 6 months (1) and causes a highway safety issue (2) would score 4 overall.

If a case scores 3 or more, an investigation will take place, and the case will progress to Tier 2. There may be negotiations as part of the initial investigation, to remedy the breach.

Low Harm – 1 point	Medium harm – 2 points	Significant harm – 3 points
Unauthorised signage and advertisements	Unauthorised development that would adversely affect the character and appearance of a conservation area or the setting of a listed building	Unauthorised works to a listed building or ancient monument
Unauthorised telecommunications equipment or satellite dishes on residential dwellings	Development of poor-quality housing, including large houses of multiple occupancy, flat conversions and residential use of outbuildings	Development/changes of use with serious implications upon the continued health and wellbeing of the public in Stafford or Cannock.
Unauthorised fences, walls and gates	Unauthorised telecommunications equipment not on a dwelling	Large scale development where a serious impact is felt over a wide area
Any breach of planning control which is temporary in nature	Breaches of planning conditions that result in harm to general amenity	Unauthorised works in progress to a tree protected by a tree preservation order or tree within a conservation area
Untidy land	Residential extensions that do not benefit from permitted development rights	

Descriptor	0	1	2
Is the breach in a conservation area?	No	Yes	
Is the breach in the greenbelt?	No	Yes	
Has the untidy land been causing an issue for more than 6 months?	No	Yes	
Does this require a site visit to determine the extent, prominence, scope or scale of the breach?	No		Yes
Is there a highway safety issue?	No		Yes
Is there a tree preservation order breach?	No	Yes	
Is this a statutory listed building?	No	Yes	

## Tier 2 – Expediency Assessment

If a breach is confirmed and negotiation does not resolve the issue, officers assess whether formal enforcement is expedient. This involves considering the level of planning harm caused and the likelihood of success if enforcement action is taken.

A breach that scores 3 (significant harm) in any area will usually proceed directly to enforcement. If no individual issue scores 3, but the total score is 4 or more, enforcement is likely to be considered. If the cumulative score is 3 or below, no further action will normally be taken.

<b>Significant harm = 3 points</b>	There is a serious harmful impact on the built environment or a serious impact on public health or amenity. It is not considered that planning consent would be granted.
<b>Medium harm = 2 points</b>	There is some impact on the built environment or some impact on public health or amenity. In cases where there is medium harm in some instances planning consent may not be granted. However, insufficient harm is caused by the development to warrant formal action. This will be based on experience and the likelihood of success at appeal of any enforcement proceedings.
<b>Low harm = 1 point</b>	There is a small impact on the built environment or a small impact on public health or amenity. In these cases, planning permission would likely be granted.
<b>No harm = 0 points</b>	There is no harm.

## 8. Prioritisation and Timescales

To make the best use of available resources, enforcement cases are prioritised based on the potential harm caused. Each case is assigned a priority rating, which determines how quickly an investigation, which may include a site visit, will be carried out.

Priority	Type of breach	Timescale for investigation
Priority 1 – High	Serious harm or potential for irreversible damage, e.g.: <ul style="list-style-type: none"> <li>Works to listed buildings (demolition/alteration/disrepair)</li> <li>Demolition or significant development in a conservation area</li> <li>Works to trees covered by a Tree Preservation Order or in a Conservation Area</li> <li>Development causing serious and immediate/irreparable harm, particularly to protected ecology or causing serious danger to the public</li> </ul>	1-2 working days
Priority 2 - Medium	Development in progress that may cause harm or become immune from enforcement, e.g.: <ul style="list-style-type: none"> <li>Operational development already in progress causing medium level of harm impacting upon the wider area</li> <li>Development where potentially immune from enforcement within 6 months</li> <li>Development causing serious harm to amenity</li> <li>Breaches of condition/non compliance with approved plans causing serious harm to amenity</li> </ul>	10 working days
Priority 3 – Lower	Development complete, but causing some harm or minor breaches of conditions, e.g.: <ul style="list-style-type: none"> <li>Operational development already in progress causing a lower level of harm than priority 2 and only to the immediate area</li> <li>Changes of use resulting in some harm to amenity</li> <li>Advertisements (other than flyposting)</li> <li>Breaches of condition/non-compliance with approved</li> <li>Plans causing non-serious harm to amenity</li> </ul>	15 working days
Priority 4 – Low	Minor breaches or untidy land issues, including: <ul style="list-style-type: none"> <li>Changes of use resulting in no harm to amenity</li> <li>Untidy land (other than where comes under Environment &amp; Health legislation)</li> </ul>	20 working days

After the investigation, we aim to provide a response or update within 10 working days.



## 9. How Breaches Are Resolved

When a breach of planning control is confirmed, the enforcement team will consider a range of actions depending on the nature of the breach and the level of harm caused. These options include:

- No further action: Where the breach is minor, technical, or not causing harm.
- Further investigation: Where more evidence or site visits are needed to assess the breach.
- Negotiation: Informal contact with the owner to resolve the breach voluntarily.
- Invite a retrospective planning application: Where permission might be granted to regularise the development.
- Formal enforcement action: Where harm is significant or where negotiation has failed.

## 10. Enforcement Tools and Powers

The following is a list of some of the enforcement tools that may be used where it is considered proportionate and in the public interest:

Type of Enforcement Action	When we may use it	What it does
Section 330 Notice	Where it appears to the Council that a breach of planning control has occurred	Enables the Council to obtain information such as the name and address of any person with an interest in land and the start and end date of any use and the name and address of any person who has used the land for that purpose.
Planning Contravention Notice	Where it appears to the Council that a breach of planning control has occurred	Enables the Council to require information about ownership and interest in land and ask specific bespoke questions relevant to the investigation of the suspected breach of planning control. A failure to complete or return a notice within 21 days is an offence, as is providing false or misleading information on the notice
Temporary Stop Notice	Where it appears to the Council that a breach of planning control has occurred	A temporary stop notice can require an activity to cease or reduce or minimise the level of activity for a period of up to 56 days. The “immediate” cessation of activities should allow for the shutting down and making safe of an activity A temporary stop notice may not prohibit the use of a building as a dwelling house.

		Temporary Stop Notice can now be issued in respect of suspected breaches of Listed building control.
Enforcement Warning Notice	Where it appears to the Council that a breach of planning control has occurred	<p>Where a local planning authority considers that unauthorised development has a reasonable prospect of being acceptable in planning terms, it can issue an enforcement warning notice. The notice will set out the matters that appear to be a breach of planning control and state that, unless an application is made by a specified date, further enforcement action may be taken.</p> <p>The issue of an enforcement warning notice constitutes taking enforcement action for the purposes of section 171B of the Town and Country Planning Act 1990.</p>
Enforcement Notice and Listed Building Enforcement Notices	An Enforcement Notice should only be issued where the local planning authority is satisfied that it appears to them that there has been a breach of planning control and it is expedient to issue a notice, taking into account the provisions of the development plan and any other material considerations.	<p>Specifies the reason(s) for it's service, the steps required to remedy the breach, the date it takes effect and the timeframe for compliance.</p> <p>There is a right of appeal against an Enforcement Notice.</p> <p>Non-compliance with the requirements of an extant Enforcement Notice is an offence.</p> <p>The requirements of an Enforcement Notice run in perpetuity with the land upon which it is served.</p>
Stop Notice	Where a breach of planning control is causing very serious harm to public amenity and the environment and this harm could not be removed or alleviated by the imposition of conditions on a planning permission, the Council will consider a Stop Notice (after the service of an Enforcement Notice) in cases where urgent action is necessary to bring about a	The Stop Notice will refer to the Enforcement Notice to which it relates, specify the activity or activities that are required to cease, and the date that it takes effect.

	cessation of a relevant activity before the expiry of the period of compliance of the related Enforcement Notice.	
Breach of Condition Notice	Where the breach of planning control relates to non-compliance with a condition on a planning permission or a limitation on a deemed planning permission has been exceeded, the Council will consider the expediency of serving a Breach of Condition Notice.	<p>The Breach of Condition Notice will specify the steps required to comply with the condition(s) or limitation(s), the date that it takes effect and the time period for compliance.</p> <p>There is no right of appeal against a Breach of Condition Notice</p>
Section 215 Notice (Untidy Land Notice)	In cases where the amenity of an area is adversely affected by the condition of land or buildings, the Council will consider the expediency of serving a Notice under s.215 of the Town and Country Planning Act 1990.	<p>The Notice will specify the steps required to be taken to remedy the condition of the land or buildings, the time period within which the steps must be taken and the date that it takes effect.</p> <p>There is a right of appeal against a Section 215 Notice to the Magistrates Court</p>
Prosecution	<p>The Council will consider commencing a prosecution in the Courts against any person who has failed to comply with the requirement(s) of any of the following Notices where the date for compliance has passed and the requirements have not been complied with</p> <ul style="list-style-type: none"> <li>(i) Enforcement Notice</li> <li>(ii) Listed Building Enforcement Notice</li> <li>Conservation Area Enforcement Notice</li> <li>Breach of Condition Notice</li> <li>(iii) Section 215 Notice</li> <li>(iv) Stop Notice</li> </ul> <p>The Council will also consider commencing a prosecution in the Courts where:</p> <ul style="list-style-type: none"> <li>(a) unauthorised works have been carried out to trees subject to a Tree Preservation Order, or in</li> </ul>	<p>Before commencing any legal proceedings the Council will be satisfied that there is sufficient evidence to offer a realistic prospect of conviction and that the legal proceedings are in the public interest.</p>

	<p>a designated Conservation Area</p> <p>(b) an advertisement is being displayed without the necessary consent and the Council's request to remove it within a specified timescale has been declined or ignored</p> <p>(c) unauthorised works have been carried out to a Listed Building</p> <p>(d) unauthorised demolition has taken place in a Conservation Area</p> <p>(e) the recipient of a Planning Contravention Notice has failed to provide a response within the prescribed time period or has supplied false or misleading information</p>	
Injunction	Where an Enforcement Notice has not been complied with and a prosecution is not considered expedient or previous prosecution(s) have failed to remedy the breach of planning control, the Council will consider applying to the Courts for an injunction. Such action will only normally be considered if the breach is particularly serious and is causing, or likely to cause, exceptional harm.	Stop unauthorised works from being carried out.
Direct Action	Where any steps required by an Enforcement Notice have not been taken within the compliance period (other than the discontinuance of the use of land), the Council will consider whether it is expedient to exercise its power under s.178 of the Town and Country Planning Act 1990 (as amended)	The Council can enter the land and take the steps to remedy the breach; and recover from the person who is then the owner of the land any expenses reasonably incurred by them in doing so.

Each case is assessed on its own merits. Any action must be proportionate to the harm caused. In all cases, the councils will follow the relevant legal processes and offer the right to appeal where applicable.

## **11. Unauthorised Encampment**

The travelling community can experience difficulties finding an approved place to stay. This means that sometimes they stop on land without permission, including highway verges and lay-bys. This Council's approach is based on preventing unlawful occupation of land.

Encampments on Council land will result in legal proceedings to evict the travellers. In the case of highway land, such as verges and lay-bys, the matter will be taken up with Staffordshire County Council, which is the local highway authority.

Trespassing on land is a civil matter, with prevention of trespass being the responsibility of the landowner. Landowners will need to seek appropriate legal advice in these circumstances.

## **12. Proactive Monitoring**

In addition to responding to complaints, the enforcement team will proactively monitor a sample of developments to check compliance with approved plans and conditions. This helps to ensure that development is taking place as expected and supports early intervention where needed.

Monitoring will be informed by building control data and site visits, with a random sample of permissions reviewed regularly.

## **13. Customer Service and Complaints**

We aim to deliver a fair and responsive enforcement service. If you feel that we have handled a case well, we welcome your feedback.

If you are unhappy with how a case has been dealt with, please contact the officer handling the matter in the first instance. If your concerns are not resolved, you may use the council's formal complaints process. Complaints about the outcome of a planning decision will not normally be revisited unless new evidence has come to light.

## **14. Equality and Human Rights**

Planning enforcement decisions must be taken with regard to the Human Rights Act 1998 and the Equality Act 2010. We will consider the effect of any proposed action on the rights and circumstances of those affected. This includes ensuring that decisions do not discriminate and take account of protected characteristics such as age, disability, race, religion or belief, sex, and gender reassignment.

Where appropriate, we will also consider how action may affect family life, home, and the peaceful enjoyment of property.

## 15. Reviewing This Policy

This joint policy will be reviewed periodically to ensure it remains up to date and reflects any changes in law, guidance or operational arrangements. Future updates may include changes to timescales, decision-making processes or how resources are shared between the two councils.

## Agenda Item 4(c)i

# Response to Notice of Motion - Protecting our Rivers and Oceans

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Head of Economic Development and Planning
<b>Portfolios:</b>	Climate Action and Nature Recovery Portfolio

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## 1 Purpose of Report

- 1.1 To further update Cabinet of the continued response and next steps to the Notice of Motion entitled 'Protecting our rivers and oceans' proposed on 28 November 2023. This is to update from the response report to Council on 27 February 2024.

## 2 Recommendation

- 2.1 To note the update of the report and the attached Action Tracker table of December 2025;
- 2.2 To note the continued response and next steps being undertaken.

### Reason for Recommendation

- 2.3 To provide a further update to Cabinet and the appropriate response(s) to the issues raised in the Notice of Motion.

## 3 Key Issues

- 3.1 On 28 November 2023, a Notice of Motion entitled 'Protecting our rivers and oceans' pursuant to Paragraph 13.1 of the Council Procedure Rules was proposed by Councillors J T Rose and D P Rouxel to the Full Council meeting.
- 3.2 A report was provided to Full Council on 27 February 2024, to consider the Council's response and next steps to the Notice of Motion submitted.
- 3.3 It is important for the Borough Council to make continued progress across a range of services and activities to address matters associated with the environment. It is also important to consider water resource and climate

change which are now being reflected through work on the emerging new Local Plan 2025-2045 and the Development Management decision-making process.

## **4 Relationship to Corporate Priorities**

- 4.1 The most relevant of the Council's Corporate Business Plan 2021-2024 key objectives to the Council Motion are set out below:

*"To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing."*

*"To continue work towards our Climate Change and Green Recovery objectives, integrating them into our activities and strategic plans"*

## **5 Report Detail**

- 5.1 Refer to the Full Council Report of 27 February 2024.
- 5.2 The Action Tracker Update table appended to this report, provides an overview of the actions undertaken and also being further considered moving forwards.
- 5.3 There has been a number of updates/actions since the last report and importantly how the importance of the 'blue' network is being considered and factored into the major forward plans for the Borough of Stafford.

## **6 Implications**

### **6.1 Financial**

There are no direct financial implications linked to the next steps and actions associated with this report. However, it should be noted that future financial resources will be required to deliver strategies, policies, evidence and work programmes on these matters through existing Council resources.

### **6.2 Legal**

There are no direct legal implications linked to the next steps and actions set out within this report.

### **6.3 Human Resources**

Key actions will be delivered by existing staff from within the Development Service and the wider organisation, where appropriate, together with engagement with other relevant organisations and agencies.



## **6.4 Risk Management**

Whilst the Council will seek to progress the actions set out in this report and minimise any risks of delay with associated strategies, policies, evidence base and work programmes it should be noted that the following external factors are beyond the Council's control and may have an impact:

- Changes in Government legislation, regulations and policy
- Failure of key partners and other agencies to deliver actions and evidence on time

It should be noted that the following risks can be considered and effectively managed by the Council:

- Staff turnover, recruitment difficulties and sickness absences leading to inadequate skills base
- Political changes, procedural delays or failure to meet Council deadlines
- Non-conformity and failure in the tests of soundness for new planning policy documents

The Council will continue to closely monitor Government legislation, regulations and policy whilst deploying robust programme management techniques to deliver actions as required. All internal risks will be reviewed when required and proposed actions delivered efficiently.

## **6.5 Equalities and Diversity**

As noted in the previous Full Council Report of 27 February 2024, a key policy document to address the matters raised in the Council Motion on Oceans and Rivers is the adopted Plan for Stafford Borough, which provides clear guidance to developers and also members of the public through planning policies and proposals across the Borough. This enables any resident or business to see the requirements related to future development. The Local Plan process delivers a statutory development plan which is designed to be inclusive to all residents and those interested in planning the future for the Borough. This will be reflected through work on the emerging new Local Plan 2025-2045.

Throughout the process of preparing the New Local Plan a thorough consultation and engagement process will enable residents and interested parties to be involved in its preparation, including 24/7 access to key documents through the Borough Council's website.

As part of the Development Management process of determining planning applications consultation and engagement takes place in line with statutory requirements. Both processes follow requirements set out in the Council's adopted Statement of Community Involvement.

There are no direct impacts identified for Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation at this stage.

## **6.6 Health**

Working from a consistent evidence base through the Borough Council and with partners, ensures that next steps and actions are consistent and complementary to an approach that supports equality in both service provision and health outcomes.

## **6.7 Climate Change**

Working from a consistent evidence base through the Borough Council and with partners, ensures that that next steps and actions are consistent and complementary to an approach that supports equality in both service provision and climate change outcomes. Stafford Borough Council's Climate Change Strategy and Climate Change Board, which is now established, will further take forward actions towards a resilient and sustainable future.

## **7 Appendices**

Motion Rivers and Oceans Tracker Update - December 2025

## **8 Previous Consideration**

Council 27 February 2024 - Minute No C57/24

## **9 Background Papers**

File available in Economic Development and Planning

<b>Contact Officer:</b>	Alex Yendole
<b>Telephone Number:</b>	07800 619530
<b>Ward Interest:</b>	Nil
<b>Report Track:</b>	Cabinet 11 December 2025 (Only)
<b>Key Decision:</b>	No

	Council Resolution (from motion)	Response to Council 27.02.24	Update December 2025
1	Recognise this Council's role in helping to protect its rivers and seas, including from the cumulative impacts of pollution, in line with its local planning policy, and the National Planning Policy Framework	Policies N1, N2, N4, N5 of the adopted Plan for Stafford Borough make reference to water resources and requirements to protect rivers in order to reduce pollution impacts.	New Local Plan 2025-2045 to update relevant policies in line with latest National Planning Policy Framework. Local Development Scheme provides current work programme and timescales. Stafford Borough Council (SBC) is commissioning consultants to assist in undertaking an updated evidence base, which will have consideration for high sustainability standards, including those related to pollution and water use.
2	Recognise that there is clear evidence of deterioration of water quality due to cumulative impact of multiple sewage discharge events or "sewage overload"	The adopted Plan for Stafford Borough 2011-2031 and the emerging new Local Plan 2020-2040 have been prepared on evidence considering water quality issues, as set out in the response to question 1	New Local Plan 2025-2045 to update relevant evidence base to support policies in line with latest National Planning Policy Framework. Local Development Scheme provides current work programme and timescales. Strategic Flood Risk Assessment and Water Cycle Study to be prepared during 2026/2027.

3	Seek to better understand the cumulative impact of wastewater discharge including untreated sewage on the Borough's rivers, wildlife and the health of its residents	The Council leads on delivering biodiversity enhancements across the Borough, including management plans for Local Nature Reserves, close working with the Staffordshire Wildlife Trust, Environment Agency and Severn Trent Water as well as facilitating a regular volunteer programme.	At the Economic Development & Planning Scrutiny meeting on 19 August 2025, Severn Trent Water (STW) provided a presentation to members outlining its 5 year investment plan and efforts to tackle the impact of untreated sewage on watercourses and habitats. STW shared the link to a website <a href="https://theriverstrust.org/sewage-map">https://theriverstrust.org/sewage-map</a> which presents datasets on sewage network discharges of treated sewage and overflows of untreated sewage and storm water into rivers within Stafford Borough.
4	Take a lead on addressing this issue, working constructively with other agencies	The adopted Plan for Stafford Borough 2011-2031 and the emerging new Local Plan 2020-2040 have been prepared on evidence considering the water quality issues, as set out in response to Q1. Stafford Borough, as the Local Planning Authority therefore sets out the policy position, based on evidence, as well as taking account of the adopted Plan and relevant information through the Development Management decision-making process. Furthermore, the Council will continue to work proactively with relevant organisations to deliver biodiversity enhancements benefitting local nature recovery strategy objectives.	New Local Plan 2025-2045 will continue to be progressed by updating relevant evidence to prepare policies as well as working in collaboration with other organisations to deliver biodiversity enhancement including the Local Nature Recovery Strategy. In addition, through Stafford Borough Council's Climate Change Strategy and Climate Change Board, there will be a corporate focus and oversight of all key areas in which the Council will be focussing on but also to facilitate greater partnership working with other key agencies and stakeholders.

5	Ensure the evidence base being compiled for the new local plan fully assesses the cumulative impact of sewage discharge so that this is factored into decisions made in the new local plan, including the overall level of future development	The emerging new Local Plan 2020-2040 is being prepared on evidence considering water quality issues	New Local Plan 2025-2045 to update relevant evidence base to support policies in line with latest National Planning Policy Framework
6	Fully incorporate JBA consulting's recommendation for 1) Early engagement with water companies as part of the planning process, 2) That more detailed water quality modelling is carried out in a Phase 2 outline study to assess the cumulative impact of growth across the whole study area on the Water Framework Directive classification of the receiving waterbodies in order to ensure that the environmental capacity of the catchment is not a constraint to growth. 3) Further study of the wastewater network is also recommended once greater certainty over which sites will be brought forward for development.	The emerging new Local Plan 2020-2040 has been prepared through engagement with water companies as set out by the evidence and will continue to consider water quality issues	New Local Plan 2025-2045 to update relevant evidence base to support policies in line with latest National Planning Policy Framework in collaboration with water companies. Strategic Flood Risk Assessment and Water Cycle Study to be prepared during 2026/2027. To continue to proactively work with other key stakeholders including the strategic flood authority.

7	To work with Severn Trent to aim for water neutrality defined by the Government and the Environment Agency as "For every development, total water use in the wider area after the development must be equal to or less than total water use in the wider area before development". Achieved by reducing leakage from the water supply networks; making new developments more water-efficient; "offsetting" new demand by retrofitting existing homes with water-efficient devices; encouraging existing commercial premises to use less water; implementing metering and tariffs to encourage the wise use of water education and awareness-raising amongst individuals	The adopted Plan for Stafford Borough 2011-2031 and the emerging Local Plan 2020-2040 have been prepared on evidence considering water quality issues. The Council will continue to work with Severn Trent and other relevant organisations to ensure local planning policy meets the Government requirements together with planning applications through the decision-making process. It should be noted that not all of these responsibilities are for Stafford Borough Council to implement	New Local Plan 2025-2045 to update relevant evidence base to support policies in line with latest National Planning Policy Framework in collaboration with water companies. The Development Management process will continue to meet its statutory requirements in terms of planning applications and the process in which planning applications assessed.
8	Write to the Environment Agency asking it to issue a position statement in relation to Stafford Borough, which sets out its understanding of the cumulative impact of 200+ sewage discharges on our rivers, or if it is not willing to do so, the reason why	Head of Economic Development and Planning to formally write to Environment Agency to request information if available	Completed November 2025
9	Ask Natural England for an ecological assessment of the River Trent and its tributaries	Head of Economic Development and Planning to formally write to Natural England to request information if available	Completed November 2025

10	Invite the Chief Executive of Severn Trent plus senior representatives from the Environment Agency and Natural England to attend a SBC Economic Development and Planning Scrutiny Committee to answer questions on the current level of sewage discharge, the ecological health of our rivers, and their plans moving forward	To be discussed with the Chair of Economic Development and Planning Scrutiny Committee. An option may be for the Head of Economic Development and Planning, relevant portfolio holders and Chair of Economic Development and Planning Scrutiny Committee to request a meeting with senior representatives from the Environment Agency and Natural England and report the outcome of the meeting to a future scrutiny committee	Additional Economic Developments and Planning Scrutiny Committee on 19 August which was attended by Severn Trent and Internal Drainage Board (IDB). Environment Agency and County Council had sent apologies. All Members were invited and all were encouraged to send questions in advance of the meeting. Further details in minutes of EDPSC - 19 August 2025
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11	<p>Ask Severn Trent Water, from this date onwards, in its planning consultation responses for major development, to clarify which treatment works will be managing the sewage; and whether it has the information available to assess the impact on the number or duration of sewage discharges into local rivers, and if it does have this information to share it</p>	<p>The Head of Economic Development and Planning could write to Severn Trent and ask to provide this information in its response to consultations on major applications. However, based on past experience, officers do not consider that this information will be provided. For many years Severn Trent has provided a limited response on planning application consultations and has reduced the number of applications on which they provide a response. The responses we do receive back often lack relevance. Whilst it is not encouraging that Severn Trent are now responding on even less planning applications the reason they gave is "to have a greater focus on new development and its impact on the environment and our customers", which suggests that they will continue to respond on major applications for new residential and commercial development. However, they will not cover all major applications as they state they will not respond on agricultural development. It does also raise the question that if the Council managed to get Severn Trent to advise which treatment works will be managing the sewage for each major application, what will we do with this information? If Severn Trent aren't responding to say that there isn't sufficient capacity in their treatment works, then it would be difficult to potentially refuse an application for this reason. A refusal in such cases is likely to result in an award of costs at appeal</p>	<p>This was raised at the Economic Development and Planning scrutiny committee on 19 August where the Head of Economic Development and Planning asked this question. STW indicated that they were only able to respond to a limited number of planning application consultations. STW confirmed that they were not a statutory consultee and evidence provided by them is not used in a judicial review. STW provided a link to their website denoting areas and information around sewage and flooding. This information is available to elected members, stakeholders and the general public.</p>
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12	<p>Request that SBC Planning Officers, from now onwards, include in all reports to major development a special section on the provision of adequate arrangements for the disposal of foul sewage trade effluent and surface water as set out in Policy N2 of the local plan under sustainable drainage, and the impact on watercourses, including the potential for the development to affect sewage outflow into watercourses (i.e. cumulative impact), or to flag if this information is not fully available, so that this information (or lack of it) is clearly and transparently set out</p>	<p>The Council recognises that planning officers have a duty to consider the provision of adequate arrangements for the disposal of foul sewage trade effluent and surface water as set out in Policy N2 of the local plan under sustainable drainage. On major applications in the case officer's report will already contain a section on drainage which, as appropriate, will summarise the drainage element of the proposal, any responses which raise issues and where necessary a discussion of the issues and a conclusion. The consultee responses are also included in the officer's report. Officers do not consider that it is possible to consider "the potential for the development to affect sewage outflow into watercourses". It is not clear as to where that information is going to come from and who is capable of analysing and monitoring that information and potentially modelling sewage flow. Council Minutes C57 - Councillor Pearce asked for an amendment: Delete paragraph 3 and insert "For major planning applications, officers will, from now on, make a specific request to Severn Trent asking for details of the potential for the development to affect sewage outflow into watercourses (i.e. cumulative impact) and will include what information, if any, is received from Severn Trent in response to this request</p>	<p>Update from Development &amp; Policy Manager; Developers are responsible for dealing with discharge that their sites are generating and not to address issues already within the network. They have a responsibility to ensure that drainage and sewage is safely disposed of and that their proposals meet the requirements of the various authorities. The statutory authorities can require mitigation otherwise they would object to the development. This negotiation takes place between the developer and statutory undertaker in order to secure support for development proposals.</p>
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13	<p>Embed protection and recovery of the Sow, Penk and Trent in all strategic decisions, plans, budgets, procurement and approaches to decisions by the Council (particularly in planning, regeneration, waste, skills and economic policy), aligning with climate change mitigation and adaption requirements, and considering nature-based solutions in our journey towards a carbon neutral and climate resilient future.</p>	<p>The adopted Plan for Stafford Borough 2011-2031 and the emerging new Local Plan 2020-2040 have been prepared on evidence considering water quality, climate change and nature based solution matters. The Council will continue to work with all relevant organisations to ensure local planning policy meets the Governments requirements. Furthermore the Council will continue to work proactively with relevant organisations to delivery biodiversity enhancements benefitting local nature recovery strategy objectives.</p>	<p>New Local Plan 2025-2045 will continue to be progressed by updating relevant evidence to prepare policies as well as working in collaboration with other organisations to deliver biodiversity enhancement including the Local Nature Recovery Strategy for Staffordshire and Stoke on Trent. As part of the emerging Masterplan for Stafford, there will be a clear renewed focus on the 'blue' contributions and to maximise the contribution of this asset to Stafford. In addition to this and as part of any future Masterplan, this may also provide further input and support when considering wider flood design, flood mitigation strategies, future funding bids to National Government, all of which aiming to achieve a resilient future.</p>
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14	<p>Ensure that the Council's Climate Change and Biodiversity Plan support ocean recovery through a focus on protection and recovery of the Sow, Penk and Trent, and the implementation of nature-based solutions.</p>	<p>Council officers will continue to work collectively to progress relevant corporate plans, as well as proactively working with relevant organisations to deliver biodiversity enhancements benefitting local nature recovery strategy objectives. Furthermore officers in the Strategic Planning and Placemaking team will continue to raise awareness of key projects linked to the adopted Plan for Stafford Borough 2011-2031 and the emerging new Local Plan 2020-2040. The Local Plan has been prepared on evidence considering water quality, climate change and nature based solution matters. The Council will continue to work with all relevant organisations to ensure local planning policy meets the Government requirements.</p>	<p>New Local Plan 2025-2045 will continue to be progressed by updating relevant evidence to prepare policies as well as working in collaboration with other organisations and partnerships to deliver biodiversity enhancement including the Local Nature Recovery Strategy for Staffordshire &amp; Stoke on Trent. Climate Change Mitigation Assessment commissioned and being prepared. External Consultants now appointed to undertake this important work programme.</p>
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15	<p>Work with partners locally and nationally to deliver improved water quality and increased sustainability, including other Staffordshire district councils, the County Council, Staffordshire Sustainability Board, Staffordshire Nature Recovery Strategy Board, other local community groups, clubs and other organisations that have a recreational, economic or other interest in its protection and recovery</p>	<p>The Council will continue to work with external partners and relevant organisations in order to implement Government legislative requirements including the Environment Act 2021 and associated corporate programmes linked to the adopted Plan for Stafford Borough 2011-2031 and the emerging new Local Plan 2020-2040. The Local Plan has been prepared on evidence considering water quality, sustainable development, climate change and nature based solution matters. Furthermore the Council will continue to work with all relevant organisations to ensure local planning policy meets the Government requirements.</p>	<p>New Local Plan 2025-2045 will continue to be progressed by updating relevant evidence to prepare policies as well as working in collaboration with other organisations to deliver biodiversity enhancement including the Local Nature Recovery Strategy for Staffordshire and Stoke on Trent. Climate Change Mitigation Assessment commissioned and being prepared. SBC's Climate Change Strategy Board has now been established and will have a focus on x5 main pillars, which will include working very closely and actively with other organisations that will contribute to the overall objectives around a resilient and sustainable future.</p>
16	<p>Use the Council website and other communication channels to update on the Sow, Penk and Trent recovery progress, and signpost to opportunities and guidance that enable residents to become more ocean literate and to get involved with river and marine citizenship activities</p>	<p>Action to be agreed by relevant Cabinet portfolio holder, in consultation with the Head of Service based on available information and updates from external organisations</p>	<p>To continue to work with the Cabinet portfolio member around the active promotion, facilitation and information from the Council. Through working in collaboration with other agencies, stakeholders and organisations through the Council's services and delivery programmes, we will continue to explore the communication channels and information share.</p>

<b>17</b>	Recognising that wherever we live we share responsibility for good marine management, we will write to Government asking them to put the ocean into net recovery by 2030 by:		
<b>17(a)</b>	Ensuring Inshore Fisheries and Conservation Authorities have the resources they need to effectively research and monitor our growing number of marine protected areas, and to set and enforce appropriate fishing levels that support local economies and deliver environmental sustainability		
<b>17(b)</b>	Working with coastal, estuarine and maritime communities to co-develop marine policy to ensure it delivers equitable and sustainable outcomes on local placemaking		
<b>17(c)</b>	Appointing a dedicated Minister for the Coast		
<b>17(d)</b>	Embedding ocean and civic literacy into the national curriculum		
<b>17(e)</b>	Stopping plastic pollution at source by strengthening the regulations around single-use plastics and set standards for microfibre-catching filters to ensure that all new domestic and commercial washing machines are fitted with a filter that captures a high percentage of microfibres produced in the wash cycle and support the solutions needed to address the threat posed by historic coastal landfill sites	Action to be agreed by relevant Cabinet portfolio holder, in consultation with the Head of Service based on available information and updates from	Letter sent from Stafford Borough Council to the Secretary of State for Environment, Food and Rural Affairs.  Further actions where and when appropriate to be agreed by relevant Cabinet portfolio holder in

<b>17(f)</b>	Improving the water quality of our rivers, estuarine and coastal waters leading to the ocean to benefit nature and the health and wellbeing of all UK residents, including by stopping the regular pollution of our rivers and seas	external organisations	relevant Cabinet portfolio holder, in consultation with the Head of Service based on available information and updates from external organisations.
<b>17(g)</b>	And by listening to marine and social scientific advice to update the Marine Policy Statement and produce a national Ocean Recovery Strategy which will: (i) Enable the recovery of marine ecosystems rather than managing degraded or altered habitats in their reduced state (ii) Consider levelling up, marine conservation, energy, industrial growth, flood and coastal erosion risk management, climate adaptation and fisheries policy holistically rather than as competing interests. (iii) Develop a smarter approach to managing the health of the entire ocean that moves beyond Marine Protected Areas and enables links to be made across sectors towards sustainability. (iv) Establish improved processes for understanding the benefits of ocean recovery, leaving no doubt the links between this and human lives, livelihoods and wellbeing		
<b>18</b>	Report to Full Council within 12 months on the actions and projects that will contribute to the recovery of the Sow, Penk and Trent and their tributaries and the nature and wildlife that they support within Stafford Borough	Action to be agreed by relevant Cabinet Portfolio Holder, in consultation with the relevant Head of Service based on available information and updates, including from external organisations	Report to be drafted to Cabinet and Council

**Agenda Item 4(d)i****Updated Strategic Risk Register**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Head of Transformation and Assurance
<b>Portfolio:</b>	Resources Portfolio

The following matter was considered by Audit and Accounts Committee at its meeting on 25 November 2025 and is submitted to Cabinet as required.

**1 Purpose of Report**

- 1.1 To set out details of the Council's Strategic Risk Register as at end of September 2025

**2 Recommendations**

- 2.1 That Cabinet approve the Strategic Risk Register and considers the progress made in the identification and management of the strategic risks.

**Reasons for Recommendations**

- 2.2 That Cabinet are required to monitor the Strategic Risk Register and the implementation of the action plans.

**3 Key Issues**

- 3.1 All strategic risks and associated action plans have been reviewed, and the Council's risk profile is summarised in the table below:

<b>Risk Status</b>	<b>Number of Risks at 30 June 2025</b>	<b>Number of Risks at 30 Sept 2025</b>
Red (High)	5	5
Orange (Medium)	4	4
Yellow (Moderate)	0	0
Green (Low)	0	0
Blue (Negligible)	0	0
<b>TOTAL</b>	<b>9</b>	<b>9</b>

## 4 Relationship to Corporate Priorities

- 4.1 Risk Management as a process supports the Council's Effective Council priority
- 4.2 The Risk Register supports the Council's Corporate Priorities as follows:
  - (i) Risk management is a systematic process by which key business risks/opportunities are identified, prioritised, and controlled so as to contribute towards the achievement of the Council's aims and objectives.
  - (ii) The strategic risks set out in the Appendices have been categorised against the Council's priorities.

## 5 Report Detail

- 5.1 The Accounts and Audit Regulations 2015 state that:

"A relevant body must ensure that it has a sound system of internal control which:-

- (a) facilitates the effective exercise of its functions and the achievement of its aims and objectives;
  - (b) ensures that the financial and operational management of the authority is effective; and
  - (c) includes effective arrangements for the management of risk."
- 5.2 Risk can be defined as uncertainty of outcome (whether positive opportunity or negative threat). Risk is ever present and some amount of risk-taking is inevitable if the council is to achieve its objectives. The aim of risk management is to ensure that the council makes cost-effective use of a risk process that has a series of well-defined steps to support better decision making through good understanding of risks and their likely impact.

### Management of Strategic Risks/Opportunities

- 5.3 Central to the risk management process is the identification, prioritisation, and management of strategic risks/opportunities. Strategic Risks are those that could have a significant impact on the Council's ability to deliver its Corporate Priorities and Objectives.
- 5.4 A new risk management framework was approved for implementation by Cabinet on 28 November 2024 and this has been used to do a fundamental review of the Council's Strategic Risks. This resulted in a fully revised risk register being produced for 1 April 2025. This has been reviewed and updated for a second time and a summary of the position at the end of the second quarter of 2025 is attached as **APPENDIX 1**.
- 5.5 Work continues to enhance and refine the risks and actions identified to manage them as the Strategic Risk Register matures. As such it is anticipated that risks and wordings may change as Leadership Team have a better understanding of the risks.



- 5.6 The risk summary illustrates the risks/opportunities using the “traffic light” method i.e.

<b>Red</b>	High risk, score 12 and above (action plan required to reduce risk and/or regular monitoring by Cabinet/Audit Committee)
<b>Orange</b>	Medium risk, score 6 to 9 (action plan required to reduce risk and monitored by Leadership Team)
<b>Yellow</b>	Moderate risk, score of 3 to 4 (risk within risk appetite, no action plan required but watching brief to ensure controls are effective and operating)
<b>Green</b>	Low risk, score below 3 (risk tolerable, no action plan required)
<b>Blue</b>	Negligible Risk, score of 1 (risk tolerable, no action plan required)

- 5.7 Cabinet and Audit Committee are receiving summary level information on all the risks as they stand at 30 September 2025 **APPENDIX 1** and detailed information of risks which are red at a residual level **APPENDIX 2**.

- 5.8 Leadership Team have reviewed all risks in detail and are monitoring all of the orange risks in addition to the red risks.

- 5.9 At the end of September some actions had been completed, and others are being progressed. There has been some slippage on a few of the actions planned due to a lack of capacity/delays in recruitment and these are highlighted in **APPENDIX 2**. There has been no change in risk score for any of the risks during Quarter 2.

## 6 Implications

### 6.1 Financial

None

### 6.2 Legal

None

### 6.3 Human Resources

None

### 6.4 Risk Management

The Risk Management implications are included within the body of the report and appendices.

### 6.5 Equalities and Diversity

None

## **6.6 Health**

None

## **6.7 Climate Change**

None

## **7 Appendices**

Appendix 1 - Summary of Strategic Risks - 30 September 2025

Appendix 2 - Strategic Risk Register Red Risks - 30 September 2025

## **8 Previous Consideration**

Audit and Accounts Committee - 25 November 2025 - Minute No TBC

## **9 Background Papers**

File of papers held by the Chief Internal Auditor & Risk Manager.

**Contact Officer:** Stephen Baddeley

**Telephone Number:** 01543 464415

**Ward Interest:** All

**Report Track:** Audit and Accounts Committee 25 November 2025  
Cabinet 11 December 2025

**Key Decision:** N/A

## Stafford Borough Council

### Summary of Strategic Risk Register as at 30 September 2025

Risk Ref	Risk Owner	Risk Name	Inherent Risk Score	Residual Risk Score June	Residual Risk Score Sept	Direction of Travel in Period	Target Score
2025-03	Chief Executive	Local Government reorganisation	16	12	12	↔	8
2025-06	Chief Executive	Corporate capacity	16	12	12	↔	12
2025-09	Operations	Safe Management of Trees	16	12	12	↔	8
2025-16	Economic Development and Planning	Delivery of Town Centre Regeneration Project	16	12	12	↔	8
2025-08	Deputy Chief Executive (Resources)	Financial Stability - SBC	16	9	9	↔	9
2025-04	Transformation and Assurance	IT Resilience	16	8	8	↔	8
2025-10	Deputy Chief Executive (Resources)	Failure to deliver good governance	16	8	8	↔	4
2025-02	Housing and Corporate Assets	Health and safety arrangements for properties	12	12	12	↔	8

[SBC]

Risk Ref	Risk Owner	Risk Name	Inherent Risk Score	Residual Risk Score June	Residual Risk Score Sept	Direction of Travel in Period	Target Score
2025-12	Chief Executive	Health and safety arrangements for people	12	8	8	↔	4

**Key to Direction of Travel**

↓	Risk has decreased	↔	Risk level unchanged	↑	Risk has increased
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## Stafford Borough Council Strategic Risk Register as at 30 September 2025

<b>Risk Ref</b>	2025-02
<b>Risk Owner</b>	Head of Housing and Corporate Assets
<b>Risk Name</b>	Health and safety arrangements for properties
<b>Risk Description</b>	Operational property procedures including CDM compliance, maintenance and management of properties is not sufficient to adequately ensure they are safe for tenants, employees, leaseholders or visitors leading to death or serious injury.
<b>Consequences</b>	Death or serious and minor injury and prosecution by HSE and private legal action. Reputational damage. Deterioration in condition of buildings Depreciation of buildings
<b>Corporate Objective SBC</b>	Effective Council
<b>Main Risk Category</b>	Health and Safety

<b>Inherent Impact</b>	<b>Inherent Likelihood</b>	<b>Inherent Risk Score</b>
4	3	12
<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Risk Score</b>
4	3	12
<b>Target Score</b>		8
<b>Comment on Target Score:</b> There are situations outside of the control which will lead to accidents and a large housing and property portfolio means that a risk score of 4 is unlikely as accidents and incidents will still happen.		

<b>Controls</b>	<b>Assurances</b>
Compliance data is held for all properties	Monthly data validation by managers
Policies approved by Leadership Team and published online, regularly reviewed.	Monitoring of spreadsheets by management
Updated policies and procedures for compliance areas.	Internal Audit Reviews

**Actions**

<b>Actions Planned</b>	<b>Person Responsible</b>	<b>Timescale</b>	<b>Progress/Comments</b>
Monthly validation of corporate assets data	Interim Asset Manager	Q4 2025/26	Contact has been made with tenants of leased properties and compliance documents/certificates have been requested
Review of Health and Safety Compliance Records of Contractors	Interim Asset Manager	Q4 2025/26	In progress - information is being requested from key contractors
Appoint Contractor to undertake Building Condition Surveys (prioritise top 5 - 60 in total)	Interim Asset Manager	Q4 2024/25	Building Condition Surveys - 23 sites completed, Consultant prices received, and an order has been placed with Lambert Smith Hampton for a further
Appoint Contractor to undertake Fire Risk Assessments	Interim Asset Manager	Q3 2025/26	Contractor appointed to undertake Fire Risk Assessment (FRA's) All FRA's will be completed by the end of July 2025
Lease and Asset Reviews	Interim Asset Manager	Q4 2025/26	In progress

**Progress Updates**

Current Position	<p>Work on the Asset Reviews is slowly progressing but will take time.</p> <p>Work from the Fire Risk Assessments in in progress</p> <p>Lease reviews and compliance checks continue but progress is slow</p> <p>It is recognised that some progress is being made but the risk score will not be reduced for a long time due to the slow nature of the work</p>
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<b>Risk Ref</b>	2025-03
<b>Risk Owner</b>	Chief Executive
<b>Risk Name</b>	Local Government reorganisation
<b>Risk Description</b>	The Council has to divert resources to the management of the Council's response plans for Local Government re-organisation which threatens the ability to maintain the quality of services at a time when capacity is already stretched.
<b>Consequences</b>	Core Services and major projects fail to be delivered Reputational damage
<b>Corporate Objective SBC</b>	Effective Council
<b>Main Risk Category</b>	Capacity/Service Delivery

<b>Inherent Impact</b>	<b>Inherent Likelihood</b>	<b>Inherent Risk Score</b>
4	4	16
<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Risk Score</b>
4	3	12
<b>Target Score</b>		12
<b>Comment on Target Score:</b> As planning for LGR is still in its infancy, it is too soon to be confident that we can mitigate this risk fully and reduce it to a 4. At present it is considered we can reduce the likelihood to a 2 giving a target score of 8. As planning and work progresses, actions and the target score will be reviewed. Progress with this risk is also linked to the risk regarding capacity (ref 2025-06).		

<b>Controls</b>	<b>Assurances</b>
LGR lead officers identified	Cabinet
	Scrutiny Committee
	Leadership Team

## Actions

<b>Actions Planned</b>	<b>Person Responsible</b>	<b>Timescale</b>	<b>Progress/Comments</b>
Consultants to be appointed to support the development of the business case and work plan to deliver this	Chief Executive	Quarter 1 2025/26	Action completed. The Southern and Mid Staffs Councils have collectively appointed consultants to support the development of the business case for submission to Government in November 2025.
Work plan for LGR Submission	Chief Executive	Quarter 1 2025/26	Action completed. A workplan has been prepared by the consultants supporting the preparation of the business case

<b>Actions Planned</b>	<b>Person Responsible</b>	<b>Timescale</b>	<b>Progress/Comments</b>
Assessment of resources needed to deliver the respective work plans	Chief Executive	Quarter 1 2025/26	Action completed. 5 workstreams have been set up to support the development of the business case. Members of Leadership Team were nominated to be the Council's representative on each of the workstreams; with the focus on the corporate functions to lead this work
Communications and Engagement Strategy to be prepared	Communications Manager	Quarter 1 2025/26	Action completed. The Communications Working Group prepared a strategy and coordinated the engagement across the Southern and Mid Staffordshire Councils.
Review of resources available to support LGR work	Head of Transformation and Assurance	Quarter 2 2025/26	Report prepared for November Cabinet recommending the redirection of resources allocated to transformation work to LGR and setting out key areas of preparatory work to be done.

### Progress Updates

Current Position	<p>The actions planned to date have been completed and the proposal for government has been drafted. Whilst there has been no impact on front line service delivery, there has been an impact on the delivery of actions within the Resources Directorate and in particular actions relating to the Governance Improvement Plan. The work on engagement over the summer was particularly resource intensive for the Communications Team.</p> <p>There will be on ongoing resource commitment up to the end of November as members and staff are briefed and the proposal is taken to Council and Cabinet for consideration.</p> <p>A report has been prepared recommending to Cabinet the redirection of resources planned for transformation work to support LGR and setting out key areas of preparatory work for the Council. However, there is still uncertainty at the moment, as to what other work is going to take place over the coming months across southern</p>
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[SBC]

	and mid Staffordshire and the resources required. This will continue to be monitored.
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<b>Risk Ref</b>	2025-06
<b>Risk Owner</b>	Chief Executive
<b>Risk Name</b>	Corporate capacity is insufficient to maintain provision of core services and deliver major projects
<b>Risk Description</b>	The inability to recruit and retain staff particularly in statutory and other core areas threatens service delivery across the Council. This risk is exacerbated by other factors such as the number of high priority projects, large procurement exercises, demand for new software, competing priorities and Local Government Reorganisation.
<b>Consequences</b>	Projects are delayed or not implemented Operational services are delivered to a lower standard, backlogs arise or service not delivered at all Complaints/damage to reputation Wellbeing of staff who are under pressure to deliver
<b>Corporate Objective SBC</b>	Effective Council
<b>Main Risk Category</b>	Capacity/Service Delivery

<b>Inherent Impact</b>	<b>Inherent Likelihood</b>	<b>Inherent Risk Score</b>
4	4	16
<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Risk Score</b>
4	3	12
<b>Target Score</b>		8
<b>Comment on Target Score:</b>  Due to the limited market in key professions such as Finance, Legal, Planning etc, the uncertainty created by Local Government Reorganisation and the volume of major projects in progress, it is considered that the residual risk score cannot be reduced further and actions planned are focussed on maintaining the current position.		

<b>Controls</b>	<b>Assurances</b>
Corporate Plan sets out priorities and key projects	Performance reporting
Use of agency staff and contractors to cover posts which are difficult to recruit to	
Market supplements to enhance salary to attract candidates	
Management of absences	Oversight by HR

## Actions

<b>Actions Planned</b>	<b>Person Responsible</b>	<b>Timescale</b>	<b>Progress/Comments</b>
Assessment of capacity, pinch points and reductions in workload consequentially	Leadership Team	Quarter 3 2025/26	Assessment of current vacancies completed. Review of work plans/major projects has

[SBC]

		(Revised from Q1 Sept 2025)	commenced but is not expected to be completed until Q3.
Management of expectations/discussion with Cabinet	Chief Executive/ Leadership Team	Q2 2025/26 and ongoing	Discussion has been delayed as the review of major projects has not been completed.

### Progress Updates

Current Position	<p>Whilst work has started to assess capacity and workload issues, this has not yet been completed. It is now estimated that will be done in Q3.</p> <p>As flagged previously, the focus is on managing capacity within the current resources and maintaining the current position so that this does not deteriorate.</p>
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<b>Risk Ref</b>	2025-09
<b>Risk Owner</b>	Operations
<b>Risk Name</b>	Safe Management of Trees
<b>Risk Description</b>	Risk of a tree or part of a tree falling on an individual/s causing death or serious injury. Risk of a tree or part of a tree falling onto a building causing severe damage to a property or the death or serious injury of an individual/s.
<b>Consequences</b>	<ul style="list-style-type: none"> <li>• Death/Serious Injury</li> <li>• Damage to property</li> <li>• HSE Investigation/Prosecution</li> <li>• Corporate Manslaughter</li> <li>• Insurance Claims</li> </ul>
<b>Corporate Objective SBC</b>	Climate Change, Nature Recovery and the Environment
<b>Main Risk Category</b>	Capacity/Service Delivery

<b>Inherent Impact</b>	<b>Inherent Likelihood</b>	<b>Inherent Risk Score</b>
4	4	16
<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Risk Score</b>
4	3	12
<b>Target Score</b>		8
<b>Comment on Target Score:</b> Given the number of trees and the unpredictability of the weather, and the increase in the number of severe weather events, it is considered the current residual likelihood score sits at a 3. With the residual impact score remaining at a 4, it makes the overall residual risk score a 12. It is unlikely that the impact score can be reduced below a 4. Due to its categorisation, the nature, and the subject area it may also be difficult to reduce the likelihood from a 3 to a 2. The residual risk score will remain high for some time at a 12 until re-inspections have been undertaken, and resultant work programmes are well established. Given the circumstances of the risk, while currently higher than preferred at 12, an overall goal of a residual risk score of an 8 is considered acceptable in the longer-term.		

<b>Controls</b>	<b>Assurances</b>
Trained Manager, Tree Officers, and Arboriculturists.	IA Reviews.
Tree Surveys	Management Information
Policies and Procedures for Tree Management	
Trees maintained using recognised tree risk management process	
SBC - Urban Forestry Strategy	
Allocation of semi-dedicated management resource.	
Knowledge of tree locations	
Historic/recent tree inspections	
Rudimentary tree database/systems in place	

## Actions

Actions Planned	Person Responsible	Timescale	Progress/Comments
Agree and secure long-term funding and resourcing	DCE(Resources) /Operations	Q1 2025/26	Completed Report presented to Cabinet 24 July 2025 to secure funding for joint integrated ICT tree system and outsourced routine health and safety tree inspections
Review tree policy and procedures	Natural Environment Manager	Q3 2025/26	
Implement new full risk-based tree management procedure	Natural Environment Manager	Q3 2025/26	
Implement risk-based programme of tree works around inspection results	Natural Environment Manager	Q3 2025/26	
Implement new joint tree management ICT GIS based system	Natural Environment Manager	Q3/Q4 2025/26	
Outsource next round of tree inspections for all trees to create new baseline data (78,000 trees)	Natural Environment Manager	Q4 2025/26	
Implement procedure for on-going risk-based inspections of trees	Natural Environment Manager	Q4 2025/26	
Deliver and monitor tree risk-based works and ongoing inspections	Natural Environment Manager	Q1 2026/27	

## Progress Updates

Current Position	<p>Report presented to Cabinet 24 July 2025 to secure funding for joint integrated ICT tree system and outsourced routine health and safety tree inspections. Procurement framework signed for new joint tree management system 15.10.25.</p> <p>Tree management is still heavily reliant upon the use of consultant tree officers and contracted tree maintenance works, at both SBC and CCDC. The Tree Management structure across both Councils is being finalised with HR and finance, and posts should be advertised during Q3 or early in Q4.</p> <p>Due to the nature of the risk, it is considered the overall residual likelihood score will not be reduced until the tree inspections have been completed and the majority of the high-risk remedial tree works identified has been completed. This may take upward of 2-3 years.</p>
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<b>Risk Ref</b>	2025-16
<b>Risk Owner</b>	Head of Economic Development and Planning
<b>Risk Name</b>	Delivery of Town Centre Regeneration Project
<b>Risk Description</b>	<p>There is a risk that the high profile large regeneration projects may not deliver as anticipated, to time or to budget, leading to reputational risks to the Council and creating financial risks that impact on the Council's financial position and could impact on service delivery and hinder the Council's wider ambition to secure economic prosperity for the District.</p> <p>There is a risk that either the Council may not be able to deliver the demolition phase of the project or secure a development partner to re-develop the cleared sites.</p>
<b>Consequences</b>	<ul style="list-style-type: none"> <li>• Major reputational risk for the Council in terms of not delivering the schemes that local residents expect; potential that Council may be unsuccessful with future funding bids</li> <li>• Reduced growth and economic prosperity for local residents</li> <li>• Decline of town centres/impact on major redevelopment proposals</li> <li>• Council exposed to unplanned financial risks and pressure on revenue resources which impacts on delivery of core services</li> <li>• Clawback of funding for non-delivery</li> <li>• Increased pressure on already stretched services/functions of the council which have capacity issues.</li> <li>• Cleared sites could sit empty for indeterminate period if developer interest doesn't materialise</li> </ul>
<b>Corporate Objective SBC</b>	Prosperous Economy
<b>Main Risk Category</b>	Reputation, Customer/Public Perception

<b>Inherent Impact</b>	<b>Inherent Likelihood</b>	<b>Inherent Risk Score</b>
4	4	16
<b>Residual Impact</b>	<b>Residual Likelihood</b>	<b>Residual Risk Score</b>
4	3	12
	<b>Target Score</b>	8

**Comment on Target Score:**

Inherent nature of the risk profile of the regeneration schemes makes it difficult to reach a score of 4, therefore a target score of 8 has been set at this stage. External influences may affect the ability to secure operators/end users to build out development within the agreed footprint of the scheme. There has been a strong level of interest in the town centre from potential operators but the residual risk score will remain at 8 until the Council agrees the overall Development Framework for the scheme and secures agreements with operators.

It should be noted that the risk profile of the scheme will change over time as the Council completes the demolition works and

secures development partners/operators to bring forward development on the cleared sites.
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Controls	Assurances
Monitoring/finance returns being prepared and submitted to MHCLG in line with timescales in agreed memorandum of understanding	Project Sponsor Statutory Officer Meetings
Key decisions taken by Cabinet in relation to the project with relevant delegations and budget approvals in place	Statutory Officer Meetings Project Sponsor
Business cases to support key acquisition with quantification of costs and risks	Review by Statutory Officers Project Sponsor
Procurement using approved frameworks to select and appoint key contractors	SCC Procurement team Internal Audit Reviews Project Sponsor
Detailed risk registers and project plans to Operational Group	Project Board Project Sponsor Internal Audit reviews. External Audit overview Statutory Office Meetings
Governance arrangements to ensure oversight of programme delivery, spend and risks; with Programme Boards, Steering groups and project delivery meetings taking place on a regular basis	Project Board Project Sponsor Internal Audit reviews. External Audit overview. Statutory Officer Meetings External Audit
Ensure that the Council is effectively managing contractors and consultants	Project Sponsor  Statutory Officer Meetings
Ensure that the Council has sufficient Programme/project management arrangements and capacity to deliver the projects	Statutory Officer Meetings  Project Sponsor
Ensure that the Council's Health and Safety/CDM requirements are met, and demolition/construction works are managed safely and in line with regulations	Review by Statutory Officers  Project Sponsor

## Actions

Actions Planned	Person Responsible	Timescale	Progress/Comments
Monthly Risk Registers and Dashboards to Leadership Team and Project Board	Head of Economic Development and Planning	Q1 2025/26	Action completed. Performance Dashboards and Risk Registers have been produced and reported to LT and Project Boards.

<b>Actions Planned</b>	<b>Person Responsible</b>	<b>Timescale</b>	<b>Progress/Comments</b>
Communications to stakeholders, partners and the public - development of Comms Strategy and Plan	Head of Economic Development and Planning, Communications Manager	Q3 2025/26  (Revised from Q1 to Q2 June 25 and from Q2 to Q3 Sept 25)	Target date needs to be revised to Q3. The revised date is necessary due to a change in the project, with the Council acquiring additional properties which expand the scale of the regeneration opportunity.
Finalise town centre investment prospectus to set out the Council's vision for the cleared site and undertake soft market testing/early market engagement	Head of Economic Development and Planning	Q2 2025/26	Action completed.  Town Centre prospectus was produced for the UKREiiF event in May 2025; the prospectus was well received with the Council organising meetings with 12 x developers and operators.
Agree approach to securing development delivery	Head of Economic Development and Planning	Q3 2025/26	The Council is producing a Development Framework which can be used to guide development within the cleared regeneration site. This will be reported to Cabinet in Quarter 4.
Formal procurement process to appoint development partner(s)	Head of Economic Development and Planning	Q1 - 2026/27	Officers have completed work to research procurement frameworks and other routes to market that could be used to select developers/operators.

### Progress Updates

Current Position	<p>Performance Dashboards and Risk Registers have been produced and reported to Project Boards and LT.</p> <p>Meetings with developers/operators are currently taking place as part of the soft market testing to discuss the regeneration opportunity being created by the Council utilising the regeneration funding. Procurement frameworks are currently being researched with the view to understand the optimum route to the market.</p> <p>The Council is currently producing a comprehensive Development Framework which sets out a vision and set of parameters for the</p>
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	<p>cleared development site and this will guide the proposed uses in this area. It is intended that a report will be taken to Cabinet in February 2026 to seek approval for the Development Framework and to recommend a preferred approach to selecting operators/end users for the scheme. During 2026/27 it is anticipated that the Council will be in a position to formally select developers/operators to deliver proposals that accord with the uses set in the Development Framework. The risk profile of the scheme will begin to shift with risk transferred to third party developer/operators rather than the Council and this will impact on the overall risk score.</p>
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**Agenda Item 4(d)ii****Quarter 2 Performance Report for 2025-26**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Head of Transformation and Assurance
<b>Portfolio:</b>	Resources Portfolio

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**1 Purpose of Report**

- 1.1 To advise Members on the progress in delivering the Council's priorities and performance at the end of the quarter 2 for 2025-26.

**2 Recommendations**

- 2.1 To note the progress made during quarter 2 in the delivery of the Council's priorities and performance as set out in **APPENDICES 1 AND 2**.

**Reasons for Recommendations**

- 2.2 The performance information allows Cabinet to monitor progress in delivery of the Council's corporate priorities and operational services.

**3 Key Issues**

- 3.1 The Corporate Business Plan 2025-28 sets out the Council's priorities and strategic objectives. The plan is supported by Priority Delivery Plans (PDPs) which set out the key projects and actions for delivery each year.
- 3.2 Overall, 87% of the key actions scheduled for quarter 2 have been delivered or are on schedule to be completed. Progress in delivering the PDPs is summarised in section 5 of the report and set out in detail in **APPENDICES 1A TO 1D**.
- 3.3 With regard to the operational performance of the key services of the Council, 67% of targets have been met or exceeded. Further details can be found at 5.6 and in **APPENDIX 2**.

**4 Relationship to Corporate Priorities**

- 4.1 The indicators and actions contribute individually to all of the Council's priorities.

## 5 Report Detail

5.1 The Corporate Business Plan 2025-28 sets out the Council's priorities and strategic objectives. There are four overarching priorities which focus on:

- the economy of the Borough;
- the health and wellbeing of residents;
- climate change and our environment; and
- being an effective Council.





5.2 The priorities are supported by a number of objectives that set out what the Council is aiming to achieve, how we will deliver these and how we will measure our performance.

### Priority Delivery Plans

5.3 The Priority Delivery Plans (PDPs) set out in **APPENDICES 1A TO 1D** to this report are the annual documents that set out how the Council will achieve progress against its strategic objectives; these plans establish the actions and timetable for delivery that are the basis of the Council's performance reporting framework.

5.4 A commentary on performance and a rating for each of the actions set out in the Delivery Plans is given in **APPENDICES 1A TO 1D**. A summary of progress, by rating, is given in table 1 below.

**Table 1: Summary of progress in delivery of key projects/actions for Quarter 2 2025-26**

Performance Rating	Action completed	Work on Target	Work < 3 months behind schedule	Work > 3 months behind schedule	Actions due to end of Quarter 2	Actions not yet due	Total Number of Actions
Priority						N/A	
Prosperous Economy	4		2		6	13	19
Communities and Wellbeing		3			3	5	8
Climate Change and Environment	6	2			8	9	17
Effective Council	1	4	1		6	1	7
Total	11	9	3		23	28	51





5.5 At the end of quarter 2, of the 23 projects/actions due for delivery in this period:

- 20 (87%) have been completed or are on target; and
- 3 (13%) are behind target.

### Key Performance Indicators

5.6 In addition to the Priority Delivery Plans, performance is also reported against the delivery of key operational services; Key Performance Indicators (KPIs) for these services are set out in **APPENDIX 2**. In summary:

**Table 2 - Summary of key performance indicators for Quarter 2**

Priority					N/A	Total Number of KPIs
	Performance exceeds target	Performance on target	Performance < 5% below target	Performance > 5% below target	Not Available/ Annual	
<b>Prosperous Economy</b>	2		1	1	3	<b>7</b>
<b>Communities and Wellbeing</b>		2			4	<b>6</b>
<b>Climate Change and Environment</b>	4		1		2	<b>7</b>
<b>Effective Council</b>	4		3		4	<b>11</b>
<b>Total</b>	<b>10</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>13</b>	<b>31</b>

5.7 Of the 18 indicators due to be reported on in quarter 2:

- 10 (56%) indicators show performance above target;
- 2 (11%) indicators show performance on target; and
- 6 (33%) indicators show performance below target.

## 6 Implications

### 6.1 Financial

There are no direct financial implications arising from the report. The financial management of the PDPs is standard in accordance with Financial Regulations and any measure to address a performance shortfall as reflected in a PDP report will require compensatory savings to be identified in the current year and be referred to the budget process for additional resources in future years.

### 6.2 Legal

None

**6.3 Human Resources**

None

**6.4 Risk Management**

The Council's Strategic Risk Register sets out the risks the Council faces in delivering its priorities.

**6.5 Equalities and Diversity**

Equality and diversity matters are addressed in individual services areas and by undertaking equality impact assessments for projects and programmes of work where this is necessary and appropriate.

**6.6 Health**

None

**6.7 Climate Change**

None

**7 Appendices**

Appendix 1A: The Economy  
 Appendix 1B: Community  
 Appendix 1C: Climate Change  
 Appendix 1D: The Council  
 Appendix 2: Key Performance Indicators

**8 Previous Consideration**

Community Wellbeing Scrutiny Committee - 4 December 2025 - Minute No TBC

**9 Background Papers**

Corporate Plan 2025-28

**Contact Officer:** Judith Aupers

**Telephone Number:** 01543 46411

**Ward Interest:** All





**Report Track:** Community Wellbeing Scrutiny Committee - 4 December 2025  
 Cabinet - 11 December 2025  
 Resources Scrutiny Committee - 16 December 2025  
 Economic Development and Planning Scrutiny - 18 December 2025

**Key Decision:** No

## Priority Delivery Plan for 2025-26

### Priority 1 - Prosperous Economy

#### Summary of Progress as at end of Quarter 2

				N/A	Total Number of Projects
Action completed	Work on target	Work < 3 months behind schedule	Work > 3 months behind schedule	Action not yet due	
4		2		13	19

#### Summary of Successes as at Quarter 2




Pre-application service being offered by the Development Management service.

#### Summary of Slippage as at Quarter 2

Delay in setting up the Stafford Station Gateway governance, due to delay in completing the acquisition of third party land by SBC.

## Priority 1 - Prosperous Economy

Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Delivery of regeneration schemes</b>	<b>Stafford Town Centre Transformation</b>						
	• Complete work on Station Approach project	X				Work on site completed in May 2025. Initial feedback on the improvements has been positive.	★
	• Complete demolition works to Guildhall shopping centre and former Co-operative department store			X			
	• Agree preferred development delivery option for cleared development sites			X			
	• Develop wider masterplan/development framework for Stafford town centre				X		
	<b>Stafford Station Gateway</b>						
	• Commence stakeholder engagement on delivery of the strategic vision for the site		X			Board meeting diarised for November which will inform the remit of the wider governance structure groups, including stakeholder engagement. Delayed as SBC role is determined by land ownership	▲

Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
	<ul style="list-style-type: none"> <li>Complete land acquisition</li> </ul>		X			Legal process initiated following Cabinet approval, timescales of acquisition are not wholly in SBC control	
	<ul style="list-style-type: none"> <li>Delivery of Levelling Up Funded activities</li> </ul>				X		
<b>Economic Growth Strategy</b>	<ul style="list-style-type: none"> <li>Review and re-draft Economic Growth Strategy for consultation</li> </ul>				X		
<b>Promotion of the Borough</b>	<ul style="list-style-type: none"> <li>Promote Stafford town centre development prospectus at UKREiiF 2025</li> </ul>	X				Investment Prospectus produced and launched at UKREiiF development event in Leeds, May 2025 with significant interest generated in the regeneration of Stafford town centre.	
<b>Pipeline of projects</b>	<ul style="list-style-type: none"> <li>Develop pipeline of future economic development and regeneration projects</li> </ul>				X		
	<ul style="list-style-type: none"> <li>Agree programme of projects for UKSPF for 2025/26</li> </ul>	X				The programme was agreed with the Leader in advance of submitting to Government in May 2025. Full details are being reported to Cabinet in July 2025.	
	<ul style="list-style-type: none"> <li>Complete delivery of UKSPF programme for 2025/6</li> </ul>				X		
	<ul style="list-style-type: none"> <li>Complete review of section 106 policy and allocations</li> </ul>				X		







Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
	<ul style="list-style-type: none"> <li>Programme and Project Allocations for section 106 funding through evidence for Cannock Chase SAC and Leisure</li> </ul>				X		
<b>Delivery of planning services to enable economic growth</b>	<ul style="list-style-type: none"> <li>Publish revised Local Development Scheme</li> </ul>				X		
	<ul style="list-style-type: none"> <li>National Planning Policy Framework (NPPF) assessment and New Local Plan implications</li> </ul>			X			
	<ul style="list-style-type: none"> <li>Prepare New Local Plan and updated evidence base,</li> </ul>				X		
	<ul style="list-style-type: none"> <li>Implement improvement plan for Development Management</li> </ul>			X			
	<ul style="list-style-type: none"> <li>Full introduction of a chargeable pre-application service</li> </ul>		X			Pre-application service introduced.	★

## Priority Delivery Plan for 2025-26

### Priority 2 - Communities and Wellbeing

#### Summary of Progress as at end of Quarter 2

				N/A	Total Number of Projects
Action completed	Work on target	Work < 3 months behind schedule	Work > 3 months behind schedule	Action not yet due	
	3			5	8

Summary of Successes as at Quarter 2
All actions due are being progressed

Summary of Slippage as at Quarter 2
None

## Priority 2 - Communities and Wellbeing





Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Delivery of council owned temporary accommodation</b>	Scope the acquisition of council owned temporary accommodation and options for management of the properties.		X			Scoping work is underway on what the delivery of council owned temporary accommodation will look like, including ways to acquire properties as well as options for contractors to manage the repairs/ maintenance and compliance of the units.	✓
	Cabinet approval for the acquisition and management of temporary accommodation units			X			
	Start of property acquisition				X		
<b>Strategic Housing and Homelessness</b>	Start procurement of a Stafford Housing Strategy.		X			Staffordshire County Council are supporting on the procurement of a Housing Strategy and a specification is in the process of being agreed	✓
	Award contract for Housing Strategy			X			
<b>Community Wellbeing</b>	Work with partners and the Integrated Care Partnership to develop priorities for reducing health inequalities	X				Community Wellbeing Partnership and wider partners including NHS primary care network representatives have continued to refine shared priorities under the CORE20+5 framework.	✓

Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
	Complete Community Wellbeing Strategy, setting out priorities across community safety and health (2025-2028).			X			
	Deliver a small grant scheme to voluntary, community and social enterprises, to support delivery of the corporate plan and Community Wellbeing Strategy			X			

## Priority Delivery Plan for 2025-26

### Priority 3 - Climate Change, Nature Recovery and the Environment

#### Summary of Progress as at end of Quarter 2

				N/A	Total Number of Projects
Action completed	Work on target	Work < 3 months behind schedule	Work > 3 months behind schedule	Action not yet due	
6	2			9	17

#### Summary of Successes as at Quarter 2

Tree management - Funding for the new integrated tree management system was secured following a report to Cabinet in July 2025, with its procurement being commenced shortly afterwards and sign off expected early in Q3.



Work continued during Q2 on the multi-phase master plan for Rowley Park, Stafford, as an inclusive main/destination park. A report has been prepared, that is scheduled for Cabinet early in Q3, including a proposal around s106 funding allocation. In addition to that report a further report has been drafted for Cabinet early in Q3, proposing the allocation of funding from reserves to four other play areas that were prioritised for investment / improvement, due to a lack of s106 funding availability.

#### Summary of Slippage as at Quarter 2

None

Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Delivery of Climate Change Action Plan</b>	Training to be carried out for Senior Officers and Elected Members	X				Keele University delivered three training workshops in the first quarter to senior service managers and elected members	★
	Delivery of the Climate Change School Engagement Project	X	X	X	X	All schools contacted. 5 have signed up and booked workshops for October. Further contact will be made with schools to try and gain further engagement.	✓
	Decarbonisation Plans for SBC owned Sites will be commissioned that will provide options for the decarbonisation of our buildings.				X		
<b>Local Plan with positive climate change policies</b>	Climate Change Adaptation and Mitigation study				X		
<b>Biodiversity in new developments</b>	Implementation of Biodiversity Net Gain in accordance with statutory requirements	X				A BNG guidance note has been produced and has been published on the Council's website.	★
<b>Nature Recovery</b>	Produce a nature recovery strategy				X		
	Develop an action plan to deliver the nature recovery strategy				X		
<b>Minimise Household Waste - Introduction of</b>	Complete procurement of food waste caddies	X				Food waste caddy procurement has been completed with orders placed with the successful bidder.	★

Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Mandatory weekly food waste collections</b>						Deliveries expected late 2025/early 2026.	
	Launch of communications plan for food waste introduction with residents			X			
	Distribute new food waste caddies and new service information to residents				X		
<b>Tree Management</b>	Secure approval and funding for integrated tree management system and tree inspections		X			Completed - Funding for the new integrated tree management system was secured following a report to Cabinet on 24 <sup>th</sup> July 2025.	★
	Begin procurement of joint tree management system (including Open Customer Facing Public Portal)		X			Completed - procurement of the joint tree management system was commenced following the above Cabinet meeting and is due to be signed off early in Q3.	★
	Commence procurement of outsourced routine health and safety tree inspections			X			
	Implement joint tree management system				X		
	Prepare joint investment strategy and work programme as part of the budget setting process				X		





Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Investment in Parks, Play Areas and Open Spaces</b>	Carry out play area development in accordance with play area improvement programme, agreed by Cabinet during 2024/25	X	X	X	X	Work is continuing on the multi-phase master plan for Rowley Park, Stafford, as an inclusive main/destination park. Report prepared, ready for Cabinet early in Q3.	
	Prepare Cabinet Report to identify S106 and other capital funding to enable the implementation of the Councils play area/parks improvement programme	X	X	X	x	Report prepared for Cabinet early in Q3, allocating significant s106 and other funding to Rowley Park and four other play areas that were prioritised for investment / improvement.	



## Priority Delivery Plan for 2025-26

### Priority 4 - Effective Council

#### Summary of Progress as at end of Quarter 2

				N/A	Total Number of Projects
Action completed	Work on target	Work < 3 months behind schedule	Work > 3 months behind schedule	Action not yet due	
1	4	1		1	7





#### Summary of Successes as at Quarter 2



Considerable work has taken place during Q2 to develop the preferred option for Local Government Reorganisation. The work has been done collaboratively by the 6 district and borough councils in Southern and Mid Staffordshire, with the support of consultants. The final submission to Government has been drafted and will be considered by Council and Cabinet in October/November.

#### Summary of Slippage as at Quarter 2





A work programme for the development of more online services has been rescheduled to Q3. Initial discussions to scope the work needed have taken place, and some data gathered. Meetings with managers are now expected to commence in Q3.

## Priority 4 - Effective Council





Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Provide more services online and improve accessibility</b>	Work with services to produce a work programme		X			Initial discussions to scope the work needed and some data gathering has taken place. Meetings with managers are planned to commence in Q3	
	Delivery of the work programme (key actions will be added once the plan has been developed and approved)			X	X		
<b>Delivery of the Value for Money Improvement Plan</b> (now referred to as the Governance Improvement Plan)	Complete delivery of the actions set out in the VFM improvement plan (this is reported on separately to Cabinet and the Audit and Accounts Committee)	X	X	X	X	Working is ongoing to deliver the actions set out in the improvement plan - this is the subject of a separate report	
<b>Code of Governance</b>	Review and update the Code of Governance	X				Work is in progress but the review will now be completed in Q3.	
<b>Consultation</b>	Undertake consultation/engagement with the public and stakeholders on key projects that affect our communities eg the production of the local plan.  These will be determined each year as part of the development of the annual priority delivery plans.	X				Work is ongoing with regard to undertaking consultation for specific projects but the development of the programme for the year has been delayed due to the work on LGR consultation taking priority	

Project	Actions and Milestones	Q1	Q2	Q3	Q4	Progress Update	Symbol
<b>Local Government Reorganisation</b>	Develop an action plan to respond to the Government's Proposals for Local Government Reorganisation.	X				The final proposal for submission to government has been drafted and will be considered by Council and Cabinet in October/November.	
	Delivery of the action plan (key actions will be added once the plan has been developed and approved)		X	X	X	A report has been prepared for Cabinet in November setting out a number of key areas for preparation for LGR. This will be developed into an action plan in due course.	


## Summary of Key Performance Indicators (KPIs) - Quarter 2 2025/26




Symbol	Description	Prosperous Economy	Communities and Wellbeing	Climate Change, Nature Recovery and the Environment	Effective Council	Total
	Performance exceeds target	2		4	4	10
	Performance on target		2			2
	Performance < 5% below target	1		1	3	5
	Performance > 5% below target	1				1
N/A	Reported Annually / Not Applicable	3	4	2	4	13
	TOTAL	7	6	7	11	31

### KPIs for Priority 1 - Prosperous Economy





Symbol	Description	Qtr 1	Qtr 2	Qtr 3	Qtr 4	End of Year
	Performance exceeds target	1	2			
	Performance on target	1				
	Performance < 5% below target		1			
	Performance > 5% below target		1			
N/A	Reported Annually / Not Applicable	5	3			
	TOTAL	7	7			

## Priority 1 - Prosperous Economy

Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
<b>Regeneration</b>									
Employment rate	79.8%	80%						N/A	Annual figure released by ONS. % relates to working age population (16-64) economically active i.e. in work or training.
Town centre vacancy rate	N/A	N/A						N/A	Data not available; indicator to be reviewed.
Number of housing completions	612	749						N/A	Annual figure at year end (1 April 25 to 31 March 26)
<b>Planning Services</b>									
Major Planning Applications determined within time	93.3%	60%	60%	50%					2 decisions made this quarter, 1 of which was out of time.

Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
Non-major Planning Applications determined within time	85.3%	70%	78.6%	67.9%					DM improvement Plan focus on older applications this quarter some of which are out of time. Team carrying 2 vacancies - interim and permanent recruitment underway plus additional staff to assist performance.
Major Planning Applications overturned at appeals as percentage of no. applications determined	Forecast < 10%	< 10%	1.4%	2.3%					
Non-major Planning Applications overturned at appeals as percentage of no. applications determined	Forecast < 10%	< 10%	1.5%	1.1%					

## KPIs for Priority 2 - Communities and Wellbeing

Symbol	Description	Qtr 1	Qtr 2	Qtr 3	Qtr 4	End of Year
	Performance exceeds target	2				
	Performance on target		2			
	Performance < 5% below target					
	Performance > 5% below target					
N/A	Reported Annually / Not Applicable	4	4			
	TOTAL	6	6			



## Priority 2 - Communities and Wellbeing

Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
<b>Strategic Housing, Homelessness and Assistance</b>									
% households had a positive outcome and secured accommodation for 6 + months	62%	39%	58%	42%				✓	The target is the national percentage, allowing comparison to local performance
Delivery of affordable housing per year working with Registered Providers, Developers and Homes England (Annual)	200 homes	210 homes						N/A	Annual figure rather than quarterly reporting
No of Disabled Facilities Grants (DFGs) completed	160	125	28	30				✓	
Annual report on delivery of the Disabled Facilities Grants service	N/A							N/A	
<b>Leisure, Culture &amp; Heritage</b>									
Annual Report from Freedom Leisure setting out the performance of all facilities and the wider wellbeing work and events they facilitate.	N/A							N/A	To be produced at year end.

Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
Health and Wellbeing									
Total value of financial outcomes achieved as a result of the Citizen's Advice contract	£4,797,117	N/A Measure only	£674,929	£544,177				N/A	Contextual information only

### KPIs for Priority 3 - Climate Change, Nature Recovery and the Environment





Symbol	Description	Qtr 1	Qtr 2	Qtr 3	Qtr 4	End of Year
★	Performance exceeds target	5	4			
✓	Performance on target					
▲	Performance < 5% below target		1			
✗	Performance > 5% below target					
N/A	Reported Annually / Not Applicable	2	2			
	TOTAL	7	7			

### Priority 3 - Climate Change, Nature Recovery and the Environment





Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
<b>Climate Change</b>									
Climate Action Plan progress is monitored via the Climate Action Board and reported quarterly to Cabinet.	New measure							N/A	Data has been collected to enable review of the Action Plan but delays in recruiting to Climate Change roles has affected officer capacity in this part of the service.
<b>Waste and Recycling</b>									
% collections completed first time	99.97%	99.90%	99.96%	99.97%				★	
Number of missed bin collections (including assisted) / 100,000 / qtr.	38 per 100,000	<40 per 100,000	38.12	28.66				★	.
% Household waste sent for re-use, recycling and composting	46.23%	48%	49.20%	45.83%				▲	SBC figures continue to follow national recycling patterns
Amount of household residual waste collected per household (Kgs)	449.05 Kgs Ave. 112.26 kgs	<448 kgs or 112 kgs / qtr.	103.88 kgs	106.20 kgs				★	




Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
<b>Streetscene</b>									
% residents' satisfied with the appearance of town centres (Stafford, Stone and Eccleshall)	95%	90%	98.3%	94.0%				★	
Satisfaction with the quality of our parks, play areas, and open spaces.		New						N/A	Annual Measure

## KPIs for Priority 4 - Effective Council

Symbol	Description	Qtr 1	Qtr 2	Qtr 3	Qtr 4	End of Year
	Performance exceeds target	3	4			
	Performance on target	2				
	Performance < 5% below target	2	3			
	Performance > 5% below target					
N/A	Reported Annually / Not Applicable	4	4			
	TOTAL	11	11			

## Priority 4: Effective Council

Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
<b>Good Customer Experience</b>									
Days taken to process new Housing Benefit and Council Tax Claims	19.3	<b>20 days</b>	20	23					Performance improved each month and in September was on target (19.1)
Days taken to process new Housing Benefit and Council Tax change of circumstances	4.9	<b>9 days</b>	2.1	2.4					
% of calls answered	96.7%	<b>95%</b>	97.1%	<b>97.5%</b>					
Number of calls answered			15,036	14,644				N/A	This is not a measure but gives context to the performance in call handling
Average call wait time	59 seconds	<b>90 seconds</b>	44 seconds	35 seconds					
Number of services (forms) available online	New	<b>N/A</b>	55	85				N/A	This year will be used to establish a baseline
Number of online transactions	New	<b>N/A</b>	10,218	<b>13,030</b>				N/A	This year will be used to establish a baseline

Indicator	Year End 24/25	Target 25/26	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Year End 25/26	Rating Symbol	Comments
<b>Funding Council Services</b>									
% of Council Tax collected annually	97.8%	<b>98% at end of year</b>	28.6%	55.7%					Target was 55.8% so performance was only fractionally below this
% National non-domestic rates (NNDR) collected	98.6%	<b>98% at end of year</b>	28.9%	57.1%					As expected, performance is below last year (59.1%). Retail, Leisure and hospitality premises have had significantly increased bills due to government relief being reduced. The collectable debit has also increased by another 900K (1.5%) due to new and increased rating assessments since April 2025.
<b>Good Governance</b>									
Freedom Of Information requests within time i.e. 20 working days	79.4%	<b>85%</b>	<b>83%</b>	<b>90.2%</b>					
Number of public consultations/engagement exercises undertaken		New						N/A	Annual measure



**Agenda Item 4(d)iii**

## **Governance Improvement Plan - Progress Report for Quarter 2 2025-26**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Head of Transformation and Assurance
<b>Portfolio:</b>	Resources Portfolio

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The following matter was considered by Audit and Accounts Committee at its meeting on 25 November 2025 and is submitted to Cabinet as required.

### **1 Purpose of Report**

- 1.1 To advise Members on the progress in the delivery of the Governance Improvement Plan at the end of Quarter 2 2025-26.

### **2 Recommendations**

- 2.1 To note the progress made in the delivery of the Governance Improvement Plan set out at **APPENDIX 1**.

#### **Reasons for Recommendations**

- 2.2 The information allows Cabinet to ensure that all appropriate steps are being taken to improve the Council's governance arrangements.

### **3 Key Issues**

- 3.1 The findings of the annual review of the Council's governance arrangements for 2024-25 were reported to the Audit and Accounts Committee on 25 June 2025. The report included an action plan to address the findings.
- 3.2 This report sets out the progress made in delivering the action plan up to the end of quarter 2 of 2025/26. Of the 34 actions due to be completed, 24% have been completed or are on target. Progress in quarter 2 has been impacted by work on Local Government Reorganisation taking precedence.

## **4 Relationship to Corporate Priorities**

4.1 Good governance and financial management specifically links to the Council's priority to be "an effective Council" and the objectives relating to:

- Value for money to local taxpayers.
- Good governance across the Council.

It also underpins the delivery of the Council's other corporate priorities and operational services.

## **5 Report Detail**





5.1 The Council has a statutory responsibility to undertake an annual review of the effectiveness of its governance arrangements, which includes the system of internal control and to publish an "annual governance statement" with the annual accounts.

5.2 In reviewing the effectiveness of the governance arrangements, the Council has to identify any 'significant governance issues' and what action will be taken to address these. There is no single definition as to what constitutes a 'significant governance issue' and judgement has to be exercised. Factors used in making such judgements include:-

- the issue has seriously prejudiced or prevented achievement of a principal objective;
- the issue has resulted in a need to seek additional funding to allow it to be resolved, or has resulted in significant diversion of resources from another service area;
- the issue has led to a material impact on the accounts;
- the Chief Internal Auditor has reported on it as significant, for this purpose, in the Internal Audit Annual Report;
- the issue, or its impact, has attracted significant public interest or has seriously damaged the reputation of the Council;
- the issue has resulted in formal action being taken by the Chief Financial Officer and/or the Monitoring Officer.

- 5.3 The Annual Governance Statement (AGS) for 2024-25 was approved by the Audit and Accounts Committee on 25 June 2025. The statement sets out details of the review undertaken, the “significant governance issues” identified and the actions to be taken to address them. This includes the outstanding actions identified during the VFM review undertaken by the External Auditors.
- 5.4 This report provides an update on the progress in delivering the planned actions at the end of quarter 2 (30 September 2025). Details of the progress is given at **APPENDIX 1** and overall performance is summarised in the table below:

**Table 1: Summary of Progress - Governance Improvement Plan**

Quarter					No longer applicable	Total Actions
	Action completed	Work on target	Work < 3 months behind schedule	Work > 3 months behind schedule	N/A	
2024/25	3	1		7	2	13
Q1 2025/26	4		3	7		14
Q2 2025/26			7			7
<b>TOTAL</b>	<b>7 (21%)</b>	<b>1 (3%)</b>	<b>10 (29%)</b>	<b>14 (41%)</b>	<b>2 (6%)</b>	<b>34 due to date</b>

- 5.5 At the end of Quarter 2 of the 34 actions due for delivery:
- 8 (24%) have been completed or are in progress;
  - 24 (70%) of actions are behind schedule; and
  - 2 (6%) are no longer applicable.
- 5.6 The s151 Officer has decided not to proceed with one action due to ongoing capacity issues within the Finance Team and Local Government Reorganisation.

- 5.7 Limited progress has been made in quarter 2 due to work on Local Government Reorganisation taking precedence and this will continue into quarter 3. Whilst the work on LGR is likely to subside slightly towards the end of quarter 3, there is much uncertainty about future work on this. Furthermore, it has become increasingly clear over the last 6 months that part of our capacity issue is due to an over-reliance on key personnel. An options appraisal to address this issue is to be undertaken, led by the Deputy Chief Executive (Resources) and s151 Officer. As the outstanding actions are unlikely to all be delivered in 2025/26, the review will also include identifying which ones can be rescheduled to 2026/27.

## **6 Implications**

### **6.1 Financial**

There are no direct financial implications arising from the report.

### **6.2 Legal**

None

### **6.3 Human Resources**

None

### **6.4 Risk Management**

A failure to deliver good governance, which includes the delivery of the improvement plan, has been included in the Council's Strategic Risk Register.

### **6.5 Equalities and Diversity**

None

### **6.6 Health**

None

### **6.7 Climate Change**

None

## **7 Appendices**

Appendix 1: Governance Improvement Plan - Summary of Progress

## **8 Previous Consideration**

Audit and Accounts Committee - 25 November 2025 - Minute No TBC

## **9 Background Papers**

Nil

**Contact Officer:** Judith Aupers

**Telephone Number:** 01543 464411

**Ward Interest:** All





**Report Track:** Audit and Accounts Committee 25 November 2025

Cabinet 11 December 2025

**Key Decision:** No

## Governance Improvement Plan - Progress Report





### Summary of Progress at 30 September 2025





Quarter					No longer applicable	Total Number of Projects
	Action completed	Work on target	Work < 3 months behind schedule	Work > 3 months behind schedule	N/A	
<b>2024/25</b>	3	1		7	2	13
<b>Q1 2025/26</b>	4		3	7		14
<b>Q2 2025/26</b>			7			7
<b>Q3 2025/26</b>						5
<b>Q4 2025/26</b>						3
<b>TOTAL</b>	<b>7 (21%)</b>	<b>1 (3%)</b>	<b>10 (29%)</b>	<b>14 (41%)</b>	<b>2 (6%)</b>	<b>34 due to date</b>

#### Commentary on Progress

Limited progress has been made in quarter 2 due to work on Local Government Reorganisation taking precedence and this will continue into quarter 3. Whilst the work on LGR is likely to subside slightly towards the end of quarter 3, there is much uncertainty about future work on this and the impact it will have on delivering the actions set out in this improvement plan.

The s151 Officer has decided not to proceed with the action relating to “lessons learnt from the implementation of the finance system” due to the amount of time that has elapsed and ongoing capacity issues within the Finance Team.





No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
<b>VFM</b>	<b>Significant Governance Issues from the former VFM Improvement Plan</b>				
<b>VFM1</b>	<b>Financial Sustainability (Statutory Recommendation 1)</b>				
17.	Regular performance monitoring to be re-established with budget managers and Leadership Team.	Deputy Chief Executive (Resources) and S151 Officer	Quarter 3 2024/25	The outturn for 2024/25 has been completed and reported to Cabinet in October.  But due to ongoing capacity issues within the Finance Team, regular budget monitoring for 25/26 has not yet been restored.	
26.	Lesson learnt exercise to be undertaken of implementation of the finance system	Deputy Chief Executive (Resources) and S151 Officer	Quarter 3 2024/25	Given the length of time that has elapsed, and the ongoing capacity issues within the Finance Team, it has been decided not to proceed with this action.	N/A
27.	Training of managers in budget management and use of the new finance system.	Deputy Chief Executive (Resources) and S151 Officer	Quarter 3 2024/25	Completed	
28.	Review of Financial Regulations	Deputy Chief Executive (Resources) and S151 Officer	Quarter 1 - 2025/26	Work has not started on this due to other priorities taking precedence. This has been rescheduled for Q3.	
29.	Training for managers on Financial Regulations	Deputy Chief Executive (Resources)	Quarter 2 - 2025/26	This has been rescheduled to Q4 to follow the review of the Financial Regulations.	




No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
4.	Implementation of remaining module of the finance system, ongoing development and maximising use of system functionality	Deputy Chief Executive (Resources) and S151 Officer	Quarter 2 - 2025/26	A review is to take place to determine whether it is cost effective to proceed with this action in light of LGR.	
55.	Performance reporting for Cabinet and Scrutiny to be developed. This will be done alongside the review and development of performance and risk reporting.	Deputy Chief Executive (Resources) and S151 Officer	Quarter 2 - 2025/26	There is currently no capacity within the Finance Team to develop this nor to maintain regular monitoring reports.	
42.	Follow-on zero-based budgeting session with managers to continue work started as part of the 2024/25 budget setting process	Deputy Chief Executive (Resources) and S151 Officer	Quarter 3 - 2025/26 for 26/27 budget setting		
<b>VFM2</b>	<b>Corporate Service Transformation and Efficiency Programme (Key Recommendation 1)</b>				
44.	Consultation and engagement to be embedded into the planning for the delivery of key projects where appropriate to ensure schemes meet community needs eg regeneration projects, redevelopment of play areas	Deputy Chief Executive (Resources) and Head of Transformation and Assurance	Quarter 1 - 2025/26	Due consideration is given in all key projects as to whether consultation/engagement is required.	
<b>VFM3</b>	<b>IT / Technology (Key Recommendation 2)</b>				
19.	Update IT security policy and adopt a cyber security policy.	Head of Transformation and Assurance and Chief Technology Officer	Quarter 3 2024/25	Completed	



No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
30.	Develop assurance reporting for IT eg report on outcome of annual health check/penetration testing to Leadership Team and Audit Committee	Head of Transformation and Assurance and Chief Technology Officer	Quarter 4 - 2024/25	Work has commenced on the IT Assurance report, but this is behind schedule. This will now be reported in Q3.	✗
31.	Review of what we include in procurements re ICT controls and information governance	Head of Transformation & Assurance, Chief Technology Officer and Information Manager	Quarter 4 - 2024/25	A revised checklist has been produced and is being tested on a sample of relevant procurements	✓
<b>VFM4</b>	<b>Fraud (Key Recommendation 3)</b>				
56.	Assess fraud risks and include in risk registers as appropriate	Chief Internal Auditor & Risk Manager and Leadership Team	Quarter 4 - 2024/25	Work in progress as part of the development of directorate and operational risk registers.	✗
45.	Review Anti - Fraud and Bribery Policy	Chief Internal Auditor & Risk Manager	Quarter 1 - 2025/26	Work has not yet started on this due to the work on developing and embedding risk management across the Council. It has been rescheduled to Q3.	✗
46.	Review of Confidential Reporting Policy	Chief Internal Auditor & Risk Manager	Quarter 1 - 2025/26	Work has not yet started on this due to the work on developing and embedding risk management across the Council. It has been rescheduled to Q3.	✗


No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
47.	Assess compliance against Cipfa 2014 Code for Fraud and develop an action plan as necessary	Chief Internal Auditor & Risk Manager	Quarter 1 - 2025/26	Work has not yet started on this due to the work on developing and embedding risk management across the Council. It has been rescheduled to Q3.	✗
61.	Review the information we report on fraud work (including data matching) to the Audit Committee.	Chief Internal Auditor & Risk Manager	Quarter 1 - 2025/26	Work has not yet started on this due to the work on developing and embedding risk management across the Council. It has been rescheduled to Q3.	✗
<b>VFM5</b>	<b>Performance Management (Key Recommendation 4)</b>				
33.	Establish corporate project resources to support transformation work (funding allocated in 2024/25 budget)	Deputy Chief Executive (Resources) and S151 Officer and Head of Transformation and Assurance	Quarter 3 2024/25	Although proposals for a Transformation Team were approved by Cabinet as part of the Transformation Strategy (5 December 2024), a report is to be considered by Cabinet in November which proposes to redirect the transformation resources to support the preparatory work needed for LGR and a more modest programme of change.	N/A
34.	Review of all projects, the current governance arrangements and establish project reporting to Leadership Team	Deputy Chief Executive (Resources) and Deputy Chief Executive (Place)	Quarter 4 - 2024/25	Preparatory work has commenced and the review will be completed in Q3.	✗



No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
57.	Develop and adopt a performance management framework to establish golden thread from Corporate Plan to service plans through to employee reviews. Framework to include protocols for ensuring data quality	Head of Transformation and Assurance	Quarter 1 - 2025/26	Discussions are to take place with the External Auditors as part of the VFM review for 2024/25 as to the adequacy of our current arrangements and what, if any, additional work is required.	
58.	Review our performance report style - delivery plans and KPIs. To consider the development of performance outcome measures	Head of Transformation and Assurance	Quarter 1 - 2025/26	As for comment above	
59.	Performance reporting for waste and leisure: <ul style="list-style-type: none"> <li>• review of KPIs for monitoring and reporting on performance;</li> <li>• establish internal validation process of contract performance; and</li> <li>• review information reported to Cabinet/Scrutiny</li> </ul>	Head of Transformation and Assurance, Head of Operations and Head of Wellbeing	Quarter 1 - 2025/26	The waste contract performance reporting has been reviewed and processes are in place to validate the contractor's data. The contractor will be required to present an annual report to the Scrutiny Committee in Q3 for the preceding year.  Annual performance reporting for the leisure the contract has also been reviewed. The contractor is to be asked to present their report to the Scrutiny Committee in Q3.	
32.	Establish a Corporate Project Management Methodology. Provide templates, guidelines, and training for key officers (LT, Service Managers and key Principal Officers/Team Leaders).	Deputy Chief Executive (Resources) and S151 Officer and Head of Transformation and Assurance	Quarter 2 - 2025/26	Work has not commenced on this due to the work on LGR taking priority. It will now be scheduled for Q4.	

No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
<b>VFM6</b>	<b>HR related issues (Improvement Recommendations 1 and 3)</b>				
23.	Complete review of hybrid working. This will inform the development of the workforce strategy and the review of the Code of Conduct as well as support the development of an asset strategy.	Head of Transformation and Assurance and HR Manager	Quarter 3 2024/25	Report discussed at Leadership Team on 15 July 2025. Further work is required and will be completed in Q3.	
22.	Establish our culture, values and type of organisation we want to be. This work will inform the following actions	Deputy Chief Executive (Resources) and S151 Officer and Head of Transformation and Assurance	Quarter 4 - 2024/25	Put on hold pending further discussion in light of Local Government Reorganisation. Considering a light touch approach.	
48.	Develop a hybrid working policy and review other related policies and processes.	Head of Transformation and Assurance and HR Manager	Quarter 2 - 2025/26	Work cannot commence on this until the review has been completed and agreement reached on the future direction of hybrid working.	
49.	Review and update the Employee Code of Conduct	Head of Transformation and Assurance and Head of Law and Governance	Quarter 3 2025/26		
62.	Development of a workforce strategy that links to long term transformation/shared services	Head of Transformation and Assurance and HR Manager	Quarter 4 - 2025/26		

No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
<b>VFM7</b>	<b>Risk Management (Improvement Recommendation 2)</b>				
24.	Training for Leadership Team, managers, team leaders/principal officers on risk management	Head of Transformation and Assurance and Chief Internal Auditor & Risk Manager	Quarter 4 - 2024/25	Completed	★
35.	Develop risk registers for each Directorate and ICT	Deputy Chief Executive (Resources), Deputy Chief Executive (Place) and Head of Transformation and Assurance	Quarter 1 - 2025/26	The risk registers are being developed. A first draft of the risks has been completed. Limited progress has been made in Q2 to complete the scoring and develop action plans	▲
36.	Establish escalation process between other risk registers and the SRR eg services, projects	Head of Transformation and Assurance and Chief Internal Auditor & Risk Manager	Quarter 1 - 2025/26	This is being developed as part of the work on the Strategic Risk Register, the Directorate Risk Registers, etc. This cannot be finalised until work on the directorate risk registers has been completed.	▲
<b>VFM8</b>	<b>Procurement and Contract Management (Improvement Recommendation 5)</b>				
15.	Update the contracts register and ensure it is compliant with transparency requirements	Head of Transformation and Assurance and Leadership Team	Quarter 4 - 2024/25	Work is now in progress and will be completed in Q3.	✗

No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
39.	Provide training for managers on procurement and contract management	Head of Transformation and Assurance	Quarter 1 - 2025/26	Training on Procurement and the new Regulations was completed in Q4 24/25.	★
50.	Work with managers and the County's Procurement Team to develop a procurements pipeline	Head of Transformation and Assurance and Leadership Team	Quarter 3 2025/26		
51.	Process to be established for publication of key data on the Council's website to meet transparency requirements re spend data, contracts register	Deputy Chief Executive (Resources) and Head of Transformation and Assurance	Quarter 3 2025/26		
<b>VFM9</b>	<b>Other Related Actions</b>				
41.	Preparation of a transformation plan for Development Management to further reduce the backlog of planning applications and to manage this within the approved budget. (From AGS 2023-24)	Head of Economic Development and Planning	Quarter 1 - 2025/26	The review of Development Management has been completed and a transformation plan has been produced.	★

No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
60.	Review of Code of Governance	Head of Transformation and Assurance	Quarter 1 - 2025/26	Work is in progress. The Code has been reviewed but Cipfa have recently issued updated guidance and this needs to be reflected in the revised Code of Governance. Completion of this has been delayed due to work on LGR taking priority. It is intended to complete the review in Q3.	
53.	Review of Scheme of Delegations as part of shared services transformation. (From AGS 2023-24)	Monitoring Officer and Leadership Team	Quarter 3 2025/26		
52.	Establish an inventory of key policies and a programme of periodic reviews	Leadership Team	Quarter 4 - 2025/26		
63.	Development of Assurance Model	Head of Transformation and Assurance and Chief Internal Auditor & Risk Manager	Quarter 4 - 2025/26		

No	Action	Lead Officer	Revised Timescale	Progress Update	Progress Rating
	<b>New Significant Governance Issues Arising from the 2024/25 Governance Review</b>				
<b>GOV</b>	<b>Governance Framework</b>				
GOV1	Training and reminders for managers on good governance and key components of the framework	Deputy Chief Executive (Resources), Head of Transformation and Assurance and Head of Law and Governance	Initial session Quarter 2 - 2025/26	This has been deferred to Q4 due to work on LGR taking priority.	
GOV2	Monitoring compliance with the governance framework	Deputy Chief Executive (Resources), Head of Transformation and Assurance and Head of Law and Governance	Mid Year Review to be undertaken in Q2	This has been deferred to Q4 due to work on LGR taking priority.	



**Agenda Item 4(d)iv**

## **Revenues and Benefits Collection Report - Quarter 2**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	11 December 2025
<b>Report of:</b>	Deputy Chief Executive - Resources
<b>Portfolio:</b>	Resources Portfolio

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### **1 Purpose of Report**

1.1 To inform Cabinet of the performance of the Revenues and Benefits Service as regards:

- The collection of Council Tax during quarter 2 of the 2025-2026 financial year.
- The collection of Business Rates during quarter 2 of the 2025-2026 financial year.
- The recovery of overpaid Housing Benefit during quarter 2 of the 2025-2026 financial year.

1.2 To seek approval to the write off of the arrears listed in the **CONFIDENTIAL APPENDICES**.

### **2 Reason(s) for Report being 'Not for Publication'**

2.1 In accordance with the provisions of Schedule 12A of the Local Government Act 1972 (as amended), the report is considered 'not for publication' under the following categories of exemption:

- Exempt Paragraph 1 - Information relating to any individual.
- Exempt Paragraph 2 - Information which is likely to reveal the identity of an individual.
- Exempt Paragraph 3 - Information relating to the financial or business affairs of any particular person (including the Council).

### **3 Recommendations**

- 3.1 That the information regarding collections be noted.
- 3.2 That the arrears listed in the **CONFIDENTIAL APPENDICES** be written off.

#### **Reasons for Recommendations**

- 3.3 Efficient collection of the Council's revenues is of major importance to the funding of Council services and those provided by our preceptors.
- 3.4 Whilst our collection rates are traditionally good, regrettably not all of the monies owed to the Council can be collected and this report contains a recommendation to write off bad debts which cannot be recovered.

### **4 Key Issues**

- 4.1 Council Tax due for the 2025/2026 year amounts to £111.8M of which some **55.7%** was collected by the 30 September.
- 4.2 Business Rates due for the 2025/2026 year amounts to £59.6M of which some **57.1%** was collected by the 30 September.

### **5 Relationship to Corporate Priorities**

- 5.1 Not Applicable.

### **6 Report Detail**

#### **Council Tax**

- 6.1 Council Tax is collected on behalf of the Borough Council, Parish Councils and our Major Preceptors (Staffordshire County Council and Commissioner for Police, Crime, Fire and Rescue). The effect of the Collection fund arrangements means that Stafford Borough Council retains around 10% of the council tax collected.
- 6.2 Council Tax due for the current year amounted to £111.8M and we have collected 55.7% of this up to the end of quarter 2. The collection rate for the same period last year was 55.8%.
- 6.3 The team will be increasing our efforts to collect older council tax debts due to the Council and this may impact some residents' ability to pay current charges.

- 6.4 In accordance with the Council's approved policies, all reasonable and lawful attempts are made to recover all amounts due. In the first instance this involves the issue of bills, reminders and final notices, followed by Summonses in the Magistrates Court where the warning notices are not effective. At all stages of this process, debtors are encouraged to engage in voluntary arrangements to repay their arrears, to prevent the need for formal action.

Where necessary and when Liability Orders are granted by Magistrates, the Council uses its powers to make deductions from earnings and benefits of debtors, where it can, and instructs Enforcement Agents where such deductions are not possible or appropriate.

In the most severe cases and for debts exceeding £5,000, the Council will consider personal bankruptcy action against individuals.

- 6.5 The recovery powers available to the Council are considerable but not completely infallible. There are occasions when bills are not paid and the debts cannot be recovered.
- 6.6 Statutory safeguards such as Debt Relief Orders, Individual's Voluntary Arrangements exist to protect debtors suffering hardship, to attempt to the expensive, stressful and sometimes ineffective process of personal bankruptcy. Where a debt is included in such an instrument, or when a debtor is bankrupt, our ordinary recovery powers cannot be used.
- 6.7 For any of our powers to be effective we need to know the whereabouts of a debtor, and this is not always the case. Where debtors abscond, we will use all reasonable endeavours to trace them and are often successful in doing so. Unfortunately, on occasions this is not so and we must submit a debt for write off.

Our trace procedures include:

- Checking our internal Council systems and following any information which may help us to trace the debtor.
- Use of credit reference agency data.
- Trace and collect facilities offered by our Enforcement Agencies
- Visits to the last known address by the Council's Property Inspector and use of external tracing agents.

Unfortunately, legislation does not currently permit access to DWP or HMRC records to trace Council Tax debtors or their employers, though a Cabinet Office project is currently reviewing this.

Data protection legislation allows us to receive information as to a debtor's whereabouts, but we cannot disclose information to other creditors.

Reciprocal arrangements with utility companies and similar are not therefore workable.

### **Business Rates**

- 6.8 Business Rates due for the current year amounts to £59.6M of which **57.1%** was collected by the 30 September. This is a small decrease on last year's collection 59.1%
- 6.9 Repeating last year's performance in the coming year will be challenging as many retail, hospitality and leisure establishments are facing increased bills as the government relief to these premises has reduced from 75% last year to 40% this year. Additionally a number of new and increased rating assessments since the start of the financial year have increased the amount that we have to collect by around 1.5%. The bills in respect of the increases, having been issued later than the annual billing round, are due for payment, later in the year.
- 6.10 The recovery powers available to us are again contained in the Council's approved policies and are used in full. Those powers and our procedures are similar to the council tax powers described above, with the exception that deductions from individuals' benefits and earnings are not permissible, even if the debtor is an individual.
- 6.11 Where rates are owed by an individual, similar safeguards exist for the debtors and trace facilities are used by the Council for absconding debtors, as described above.
- 6.12 Additionally, in the case of business rates, as has been reported to Cabinet previously, our collection efforts are sometimes frustrated by weaknesses in legislation. Rates are due from the occupiers rather than the owners of property and where the occupier is a company, we can only recover from that company. Some proprietors will strip a company of its assets, or dissolve the company before we have had an opportunity to implement our recovery procedures. A new company is then formed in a similar style, to trade from the same premises.

Central Government has previously undertaken to review the loopholes that exist in rating and company legislation, though no changes have yet been received. Officers continue to actively monitor these issues.

- 6.13 3 irrecoverable Business Rate debts in the sum of £94,207.95 are listed in the **CONFIDENTIAL APPENDIX** to this report.

## **Housing Benefit Overpayments**

- 6.14 The Council manages the Housing Benefit scheme on behalf of the Department for Work and Pensions, who fund the cost of benefits paid to claimants.
- 6.15 Sometimes a claimant will be paid too much Housing Benefit, for example when the Council does not become aware of a change of circumstances until after the claimant has been paid the benefit. This is called an Overpayment of Housing Benefit. The Council is expected to recover these overpayments from the claimant in all but a few limited circumstances. DWP will fund only 40% of benefit which is overpaid as a result of claimant error or fraud.
- 6.16 Where an overpayment occurs as a result of a local authority error, DWP will provide 100% funding provided our error rate remains below a threshold of 0.48% of benefit paid, as it has routinely done for many years.
- 6.17 Recovery of overpaid Housing Benefit continues to progress well, with some £198.4K being collected in the second quarter of this financial year. This income is received into the General Fund, in addition to the Government subsidy and is not shared with preceptors.

## **7 Implications**

### **7.1 Financial**

Council Tax write offs are losses to the Collection Fund and, as such, form part of the cost of collection incurred by this Council.

The amounts being recommended are well below the value of the bad debt provision, which the Council includes within its accounts in expectation that some amounts owed will not be paid and cannot be recovered.

The cost of collecting the debts has been considered as part of the decision to put them forward for write off. If further information does come forward about the whereabouts of any of the individual debtors the Council will pursue recovery action.

Cabinet are asked to write off the debts as they are considered to be irrecoverable for the reasons given in the appendices. The debts remain legally due to the Council and should the circumstances causing the write off in any particular case, subsequently change, recovery action may be recommenced.

## **7.2 Legal**

Cabinet are asked to write off the debts as they are considered to be irrecoverable for the reasons given in the appendices. The debts remain legally due to the Council and should the circumstances causing the write off in any particular case, subsequently change, recovery action may be recommenced.

## **7.3 Human Resources**

None

## **7.4 Risk Management**

None

## **7.5 Equalities and Diversity**

None

## **7.6 Health**

None

## **6.7 Climate Change**

None

## **7 Appendices**

Appendix 1: Business Rates to be considered for Write Off - **CONFIDENTIAL**

## **8 Previous Consideration**

None

## **9 Background Papers**

None

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**Ward Interest:** Nil

**Report Track:** Cabinet 11 December 2025 (Only)

**Key Decision:** No