



## Notice of a meeting of Council

**Monday, 20 June 2022**

**2.30 pm**

**Council Chamber - Municipal Offices**

| <b>Membership</b>   |  |
|---------------------|--|
| <b>Councillors:</b> | Sandra Holliday (Chair), Matt Babbage (Vice-Chair), Glenn Andrews, Victoria Atherstone, Paul Baker, Adrian Bamford, Garth Barnes, Ian Bassett-Smith, Graham Beale, Angie Boyes, Nigel Britter, Jackie Chelin, Barbara Clark, Flo Clucas, Mike Collins, Iain Dobie, Stephan Fifield, Bernard Fisher, Wendy Flynn, Tim Harman, Steve Harvey, Rowena Hay, Martin Horwood, Peter Jeffries, Tabi Joy, Alisha Lewis, Paul McCloskey, Emma Nelson, Tony Oliver, John Payne, Richard Pineger, Julie Sankey, Louis Savage, Diggory Seacome, Izaac Tailford, Julian Tooke, Simon Wheeler, Max Wilkinson, Suzanne Williams and David Willingham |

## Agenda

|           |  |                    |
|-----------|--|--------------------|
| <b>1.</b> | <b>APOLOGIES</b>   |                    |
| <b>2.</b> | <b>DECLARATIONS OF INTEREST</b>  |                    |
| <b>3.</b> | <b>MINUTES OF THE LAST MEETING</b><br>Minutes of the meeting and the Extraordinary meeting held on 16 May 2022 | (Pages<br>3 - 12)  |
| <b>4.</b> | <b>COMMUNICATIONS BY THE MAYOR</b>   |                    |
| <b>5.</b> | <b>COMMUNICATIONS BY THE LEADER OF THE COUNCIL</b>   |                    |
| <b>6.</b> | <b>TO RECEIVE PETITIONS</b>  |                    |
| <b>7.</b> | <b>PUBLIC QUESTIONS</b><br>These must be received no later than 12 noon on Monday 13 June 2022.                |                    |
| <b>8.</b> | <b>MEMBER QUESTIONS</b><br>These must be received no later than 12 noon on Monday 13 June 2022                 |                    |
| <b>9.</b> | <b>LIGHT UP SANDFORD PARK - PETITION</b><br>Report of the Leader   | (Pages<br>13 - 28) |

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|------------|--|------------------|
|            |  |                  |
| <b>10.</b> | <b>COMMUNITY INFRASTRUCTURE LEVY GOVERNANCE &amp; SECTION 106 ENGAGEMENT</b><br>Report of the Leader and Cabinet Member Customer and Regulatory Services | (Pages 29 - 44)  |
|            |  |                  |
| <b>11.</b> | <b>CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT ADOPTION</b><br>Report of the Cabinet Member Climate Emergency   | (Pages 45 - 128) |
|            |  |                  |
| <b>12.</b> | <b>NOTICES OF MOTION</b>   |                  |
|            |  |                  |
| <b>13.</b> | <b>ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION</b>   |                  |
|            |  |                  |

**Contact Officer:** Bev Thomas, Democratic Services Team Leader, 01242 264246

**Email:** [democratic.services@cheltenham.gov.uk](mailto:democratic.services@cheltenham.gov.uk)

**Gareth Edmundson**  
**Chief Executive**

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At the start of the meeting the Chair will confirm this. The footage will be streamed live on the YouTube channel.

If you participate in the meeting you are consenting to the use of those sound recordings for broadcasting and training purposes.

## Council

**Monday, 16th May, 2022**

**2.30 - 3.10 pm**

| Attendees           |   |
|---------------------|---|
| <b>Councillors:</b> | Steve Harvey (Chair), Sandra Holliday (Vice-Chair), Victoria Atherstone, Matt Babbage, Paul Baker, Garth Barnes, Angie Boyes, Nigel Britter, Barbara Clark, Flo Clucas, Mike Collins, Iain Dobie, Stephan Fifield, Bernard Fisher, Wendy Flynn, Tim Harman, Rowena Hay, Martin Horwood, Peter Jeffries, Alisha Lewis, Paul McCloskey, Emma Nelson, Tony Oliver, John Payne, Richard Pineger, Julie Sankey, Louis Savage, Diggory Seacome, Simon Wheeler, Max Wilkinson, Suzanne Williams, Glenn Andrews, Adrian Bamford, Jackie Chelin, Tabi Joy and Izaac Tailford |

## Minutes

### 1. APOLOGIES

Apologies were received from Cllrs. Beale, Bassett-Smith, Tooke and Willingham.

### 2. COMMUNICATIONS BY THE RETIRING MAYOR

The Mayor noted that he was not sure where the last year had gone, and invited the newly elected Members to introduce themselves. He wished the Members the very best in their terms of office, and reminded them of both the Code of Conduct and the need to strive for a fairer, kinder and more tolerant world.

### 3. ELECTION OF MAYOR (CHAIR OF COUNCIL) 2022-23

Cllr. Wheeler proposed that Cllr. Holliday be elected Mayor, and Cllr. Seacome seconded this.

One Member spoke in objection to the nomination, suggesting that the Mayor-elect had sent an email some time ago that contained offensive and racist comments, highlighting a cultural problem and a lack of understanding of racism within the Liberal Democrat group. The issue of racism was uncomfortable and embarrassing but needed to be challenged. The culture of the local party was unwelcoming to people of colour, and had driven their only black candidate to resign last year. The electorate had not been made fully aware of Cllr. Holliday's record and might have voted differently if they had all the facts, and her nomination went against the values of the Liberal Democrats. She had failed to take responsibility for the harm she had caused, and had never admitted that what she did and said was categorically wrong.

They continued by reminding Members that in June 2020 they had committed to total opposition to any kind of racism, both deliberate and unconscious, and it was important to ensure that the council was a welcoming and safe place for

everyone regardless of the colour of their skin. It was currently not representative of the community it served, instead representing inequality and privilege. There was a part of the community whose fair and equal share of influence was withheld from them, and this would not change unless the culture of the Liberal Democrat group did. They emphasised that due to this failure of holding people to account, the overlooking of racist views because of how long she had served her community, electing Cllr. Holliday to the position of First Citizen would send a hostile and negative message to ethnic minorities.

The Mayor added that Cllr. Holliday had been rebuked at the time, and had attended training, apologised and served her suspension. One Member added that she had also been subject to a Standards Committee, in line with the council's constitutional processes, and the outcome of this was public record.

**RESOLVED THAT**

**Councillor Sandra Holliday be, and is hereby elected Mayor of the Borough of Cheltenham and Council Chair for the ensuing Municipal Year.**

**The Head of Paid Service invited the Mayor to sign a Declaration of Acceptance of Office of Council Chair for the ensuing municipal year 2022-23.**

**Councillor Sandra Holliday took the chair.**

**4. ELECTION OF DEPUTY MAYOR (VICE-CHAIR OF COUNCIL) 2022-23**

Cllr. Savage proposed that Cllr. Babbage be elected Deputy Mayor, and Cllr. Hay seconded this.

**RESOLVED THAT**

**Councillor Matt Babbage be, and is hereby elected Deputy Mayor of the Borough of Cheltenham and Council Vice-Chair for the ensuing Municipal Year.**

**The Head of Paid Service invited the Deputy Mayor to sign a Declaration of Acceptance of Office of Council Vice-Chair for the ensuing municipal year 2022-23.**

**5. DECLARATIONS OF INTEREST**

There were none.

**6. MINUTES OF THE LAST MEETING**

**RESOLVED THAT**

**The minutes of the extraordinary meeting held on 25<sup>th</sup> April were approved and signed as a correct record.**

**7. COMMUNICATIONS BY THE MAYOR**

The new Mayor reminded Members that they were all invited to attend Mayor Making at the Town Hall that evening.



**8. COMMUNICATIONS BY THE LEADER OF THE COUNCIL**

The Leader welcomed the new councillors and congratulated all those who were elected or re-elected in the recent ward elections. She reported that the Community Jubilee Fund, agreed at February Council to celebrate the Queen's platinum jubilee year, had attracted 21 bids so far and signed off grant applications to community organisations totalling £16.5k.

**9. TO NOTE THE MEMBERSHIP OF CABINET INCLUDING THE DEPUTY LEADER**

The Leader outlined the membership of Cabinet, which included a number of changes to portfolios.

Cllr. Jeffries remained as Deputy Leader with the Finance and Assets portfolio, while Cllr. Dobie remained Cabinet Member Waste, Recycling and Street Services. Cllr. Clucas retained the Safety and Communities portfolio and Cllr. Horwood retained Customer and Regulatory Services.

Cllr. Collins would take on Cyber, Regeneration and Commercial Income, with Cllr. Atherstone moving to the Housing portfolio. Cllr. Lewis would take on the Climate Emergency portfolio, with Cllr. Wilkinson now responsible for Economic Development, Culture, Tourism and Wellbeing.

**10. TO ESTABLISH AND APPOINT TO THE FOLLOWING COMMITTEES INCLUDING THE APPOINTMENT OF SUBSTITUTE MEMBERS**

**(A) APPOINTMENT OF THE CHAIR AND VICE CHAIR OF OVERVIEW AND SCRUTINY**

Cllr. Harman proposed that Cllr. Savage be elected Chair of Overview and Scrutiny, and Cllr. Babbage seconded this. The Mayor moved to the vote, where this was rejected.

Cllr. Hay proposed that Cllr. Payne be elected Chair of Overview and Scrutiny, and Cllr. Jeffries seconded this. The Mayor moved to the vote, where this was carried.

Cllr. Payne was elected Chair of O&S, with Cllr. Harvey elected Vice-Chair.

**(B) APPOINTMENT TO GLOUCESTERSHIRE HEALTH OVERVIEW AND SCRUTINY COMMITTEE (AND SUBSTITUTE)**

Cllr. Bamford was nominated to sit on the Gloucestershire Health Overview and Scrutiny Committee, with Cllr. Horwood as substitute.

The Mayor moved to the vote, where this was carried with one abstention.

**(C) APPOINTMENT TO GLOUCESTERSHIRE ECONOMIC GROWTH JOINT COMMITTEE (AND SUBSTITUTE)**

Cllr. McCloskey was nominated to sit on the Gloucestershire Economic Growth Joint Committee.

The Leader added that they would not be putting forward a substitute at this time. Cllr. Atherstone had been originally proposed but she was a Cabinet Member and this was a scrutiny committee, so it would not be appropriate.

The Mayor moved to the vote, where this was carried unanimously.

**(D) APPOINTMENT TO GLOUCESTERSHIRE POLICE AND CRIME PANEL (AND SUBSTITUTE)**

Cllr. Clucas was nominated to sit on the Gloucestershire Police and Crime Panel, with Cllr. Willingham as substitute.

The Mayor moved to the vote, where this was carried with one abstention.

**11. APPOINTMENT TO ADVISORY PANELS AND WORKING GROUPS**

The Mayor moved to the vote en bloc, which was carried unanimously.

**12. APPOINTMENT OF MEMBER CHAMPIONS**

The Mayor moved to the vote en bloc, which was carried unanimously.

**13. TO APPROVE CONSEQUENTIAL CHANGES TO THE CONSTITUTION**

There were none.

**14. TO RECEIVE PETITIONS**

There were none.

**15. ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION**

The Mayor advised members that in appointing Chairs and Vice chairs of committees and working groups there were a number of options as follows :

Option 1: Chairs and Vice chairs could be elected at the first meeting of the committee.

Option 2: Each committee could be asked today to elect their Chair and Vice-Chair today by effectively having separate meetings of each committee.

Option 3: the Chairs and Vice Chairs can be elected today by Council. The Mayor noted that the other committees would elect their Chair and Vice-Chair at their next meeting.

Members agreed to proceed on the basis of Option 3.

One Member proposed that Cllr. Seacome be elected Chair of the Full Licensing Committee. The Mayor moved to the vote, where this was rejected. Cllr. Willingham was elected Chair of the Full Licensing Committee.

The Chairs and Vice Chairs of the following committees were elected and contained in the table attached to these minutes.

Audit Committee

Planning Committee

Licensing Committee

Appointments and Remuneration Committee

**16. LOCAL GOVERNMENT ACT 1972 -EXEMPT INFORMATION  
RESOLVED THAT**

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

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

**17. EXEMPT MINUTES  
RESOLVED THAT**

**The exempt minutes of the extraordinary meeting held on 25<sup>th</sup> April meeting were approved and signed as a correct record.**

**Steve Harvey  
Chairman**

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**Council**

**Monday, 16th May, 2022  
3.30 - 3.35 pm**

| <b>Attendees</b>    |  |
|---------------------|--|
| <b>Councillors:</b> | Sandra Holliday (Chair), Matt Babbage (Vice-Chair), Victoria Atherstone, Paul Baker, Dilys Barrell, Nigel Britter, Jonny Brownstein, Barbara Clark, Flo Clucas, Mike Collins, Iain Dobie, Stephan Fifield, Bernard Fisher, Wendy Flynn, Tim Harman, Rowena Hay, Alex Hegenbarth, Martin Horwood, Peter Jeffries, Alisha Lewis, Chris Mason, Paul McCloskey, Andrew McKinlay, Emma Nelson, John Payne, Richard Pineger, Julie Sankey, Louis Savage, Diggory Seacome, Jo Stafford, Simon Wheeler, Max Wilkinson, Suzanne Williams, David Willingham, Glenn Andrews, Adrian Bamford, Jackie Chelin, Tabi Joy and Izaac Tailford |

**Minutes**

**1. APOLOGIES**

Apologies were received from Cllrs. Barnes, Beale, Boyes, Bassett-Smith, Oliver and Tooke.

**2. DECLARATIONS OF INTEREST**

There were none.

**3. APPOINTMENT OF HONORARY ALDERMEN**

The Chief Executive explained that Council could confer the role of Alderman to former councillors on the grounds of eminent services to the authority. With that in mind, the recommendation was to confer the title on former councillor Andrew McKinlay.

**RESOLVED (unanimously) THAT**

**Council confers the title of Honorary Alderman on former Councillor Andrew McKinlay**

Sandra Holliday  
**Chair**

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## Cheltenham Borough Council Council – 20<sup>th</sup> June 2022 Light Up Sandford Park - Petition

|                             |   |
|-----------------------------|---|
| <b>Accountable Member</b>   | <b>Leader, Cllr Rowena Hay</b>  |
| <b>Accountable Officer</b>  | <b>Director of Community &amp; Economic Development</b>   |
| <b>Ward(s) Affected</b>     | <b>All</b>  |
| <b>Significant Decision</b> | <b>Yes</b>  |
| <b>Executive Summary</b>    | <p>The following petition was received by Council on 18<sup>th</sup> February 2022. As the petition had in excess of 750 signatures it is entitled to a debate at Council.</p> <p><b><i>“Light Up Sandford Park – Petition</i></b></p> <p><i>To Cheltenham Borough Council and specifically to the cabinet member for Safety and Communities, We the people of Cheltenham would like to use Sandford Park safely both day and night, we therefore politely ask the council to place in this park lighting, as seen in other parks in Cheltenham. Our justification for this comes in the form of two different studies:</i></p> <p><i>Kate A Painter PhD and David P Farrington PhD both of the Institute of Criminology at Cambridge University revealed the findings of their Street Lighting observations in 2001 which shows a 41% and 43% decrease in crime in their respective experimental areas (Dudley and Stoke on Trent on this occasion) as well as a notable decrease in crime in surrounding areas. The financial savings (from reduced crime) exceeded the financial costs by up to ten times within 1 year.</i></p> <p><i>As well as their findings, the College of Policing report on street lighting (Feb 2015) shows a notable decrease in crime of an average of 21% when an areas is well lit.</i></p> <p><i>We would like Sandford Park to be provided with lighting throughout, on both sides of College Road and from Bath Road to Keynsham Road. The evidence provided shows that not only is possible to reduce crime in this area but also the effect of doing so would be financially beneficial.”</i></p> <p>In reviewing the detail of the petition, what is clear is that debate on crime prevention and community safety is a whole town issue and not limited to our parks and gardens.</p> <p>This reflects the Council’s Corporate Plan and Place Vision. In</p> |

responding to this petition, the council has therefore broadened out its response as noted at Council on 21<sup>st</sup> March 2022, to include wider community safety issues and engaged with relevant key agencies, whilst at the same time reviewing the particular issues raised in respect of Sandford Park.

The recommendations of this report are therefore split to reflect this approach

## Recommendations

### In respect of Sandford Park:

1. **Recognise the existing strong relationship between the Council and the Friends of Sandford Park and thank them for their hard work in supporting the maintenance and upkeep of the park working in collaboration with the councils Green Spaces team**
2. **For the Council to work with the Friends of Sandford Park during volunteer working parties to identify and sensitively manage vegetation to improve security and public safety, whilst also having regard to the work being undertaken by the University of Gloucestershire to survey bat populations in Sandford Park**
3. **Note the importance of urban green spaces in providing vital dark space important for the survival of urban fauna and flora**
4. **For the Cabinet Member Waste, Recycling & Street Services to share this report and liaise with his counterpart at Gloucestershire County Council regarding improvements to existing cycle path lighting in Sandford Park in the context of active travel**

### In respect of community safety across the borough:

5. **Recognise the importance of the partnership working between the Council, Gloucestershire Constabulary, the Police and Crime Commissioner, the MP and Gloucestershire County Council to keep the public safe and work collaboratively on the wider issue of crime prevention and community safety**
6. **Recognise the valuable relationship that the council has with local community groups across the town and local ward councillors in supporting efforts to keep the public safe.**
7. **Thank the petitioners and acknowledge that this is a very important issue**

## Financial implications

Both capital and revenue funding would need to be identified for any new lighting schemes proposed, for supply and on-going maintenance

**Contact officer: [andrew.taylor@cheltenham.gov.uk](mailto:andrew.taylor@cheltenham.gov.uk)**

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|--|--|
| <b>Legal implications</b>  | <p>The petition will be debated at Council in accordance with the Council's Petition Scheme. The petition will be considered in accordance with the Council Procedure Rules varied in so far as necessary to comply with the attached Process. In relation to any decisions that arise from the Petition, Full Council can only take those decisions that are the responsibility of Full Council</p> <p><b>Contact officer:</b> <a href="mailto:legalservices@onelegal.org.uk">legalservices@onelegal.org.uk</a></p> |
| <b>HR implications (including learning and organisational development)</b> | <p>None arising from this report</p> <p><b>Contact officer:</b> <a href="mailto:Georgie.Tweddell@publicagroup.uk">Georgie.Tweddell@publicagroup.uk</a></p>   |
| <b>Key risks</b>   | <b>See Appendix 2</b>  |
| <b>Corporate and community plan Implications</b>                           | <p>Of relevance, the Council's Corporate Plan and Place Vision states that:</p> <ul style="list-style-type: none"> <li><i>We ensure that all our residents, businesses and visitors feel safe</i></li> <li><i>We will continue to invest in our high street and public spaces for the benefit of people living, working and visiting Cheltenham</i></li> </ul>   |
| <b>Environmental and climate change implications</b>                       | <p>Artificial lighting can have a serious detrimental effect on urban wildlife, and could negatively affect the Council's aims to improve biodiversity. Careful consideration needs to be given to the energy consumption of any proposed lighting schemes.</p> <p><b>Contact officer:</b> <a href="mailto:laura.tapping@cheltenham.gov.uk">laura.tapping@cheltenham.gov.uk</a></p>  |
| <b>Property/Asset Implications</b>   | <p>The Council does not currently have budget for maintenance of street style lighting in its parks. Where they exist, they are maintained and paid for by Gloucestershire County Council. Revenue funding would need to be identified for the continual upkeep and energy usage.</p> <p><b>Contact officer:</b> <a href="mailto:gemma.bell@cheltenham.gov.uk">gemma.bell@cheltenham.gov.uk</a>, 01242</p>   |

## 1. Background to the Petition Scheme

- 1.1** The Council's Petition Scheme is designed to ensure that the public have easy access to information about how to petition their local authority and they will know what to expect from their local authority in response. Included within the Scheme is the requirement to have a full Council debate should a petition with 750 signatures be received.
- 1.2** The Scheme recognises that the issue may be referred to another part of the authority where the matter is not one reserved for Council. The purpose of the requirement for Council debate, therefore, is not to ensure that the final decision relating to the petition issue is made at that Council meeting but to increase the transparency of the decision making process, ensuring that debates on significant petitions are publicised with sufficient notice to enable the petition organiser and public to attend. It also ensures that local people know that their views have been listened to and they have the opportunity to hear their local representative debate their concerns. The outcome of debates will depend on the subject matter of the petition.

## 2. The Petition

- 2.1** The Council received a petition at its meeting on 18<sup>th</sup> February 2022. The wording of the petition is set out in the Executive Summary of this report.
- 2.2** Richard Newman was nominated as the petition organiser.
- 2.3** The Council is therefore required to debate the petition for a maximum of 15 minutes in accordance with the Petitions Scheme approved by Council on the 13 May 2010. A process for dealing with a petition was produced by officers and is attached as Appendix 1 as a process to be followed for the debate at this meeting. The debate should conclude with one or more decisions taken pursuant to the Petition Scheme as follows
- Taking the action requested in the petition (provided the matter is reserved to full Council for decision);
  - Referring the matter to Cabinet or an Appropriate Cabinet Member or Committee (including Overview and Scrutiny) for further consideration;
  - Holding an inquiry into the matter;
  - Undertaking research into the matter;
  - Holding a public meeting;
  - Holding a consultation;
  - Holding a meeting with petitioners;
  - Calling a referendum;
  - Writing to the petition organiser setting out our views about the request in the petition;
  - Taking no further action on the matter.

### **3. Sandford Park assessment**

#### **3.1 Lighting in the Park**

Sandford Park currently has 13 lamp columns running east to west along the River Chelt cycle path. This incorporates both parts of the park either side of College Road. Further lighting exists outside of the park along the designated cycle path between Keynsham Road and Old Bath Road, and then through Cox's Meadow to Moorend Road. In addition, highway lighting on the Hight Street, College Road and Keynsham Road illuminate parts of the park where columns are adjacent to its perimeter. The lighting is managed and maintained by Gloucestershire County Council (GCC).

The Council currently has no revenue budget for lighting, and is dependent on GCC to undertake this. Where the Council has previously introduced lighting into green space, the County Council has adopted the lighting as long as it meets their standard specification. Proportionately, Sandford Park has approximately the same amount of lighting as similar parks in the town, where often it is situated along designated cycle routes.

#### **3.2 Gloucestershire Constabulary Advice and Comments**

The Crime Prevention Design Advisor at Gloucestershire Constabulary has undertaken a crime prevention assessment of Sandford Park, which is attached as appendix 3 to this report. The document contains analysis of reported crimes in Sandford Park over five years compared with other parks in Cheltenham, as well as commenting on previous research undertaken on lighting in urban areas. Academic research relating to lighting in parks and public open spaces is very limited. Research, such as that referred to in the petition, has tended to focus on streets and housing estates and the types of crimes associated with these areas.

More recently academic research concerning the principles of Crime Prevention through Environmental Design (CPTED) has been discussed more openly following the tragic death of Sarah Everard.

Most reported crime in Sandford Park, as with other parks in Cheltenham, is related to anti-social behaviour, and occurs more frequently during spring and summer and in daylight hours.

The report also recognises the importance of ecological considerations, and when more people use public space, natural surveillance is increased which reduces crime and anti-social behaviour. The report also refers to other non-lighting related measures that could be undertaken to improve security such as assessing tree canopies and foliage; a point, which is reflected within the recommendations of this report. The advisor's report concludes that:

*"The proposed addition of more artificial lighting through the parks needs to address the delicate balance between visitor numbers and the need to reduce crime; the need to address light pollution and maintain dark skies; and the impact it will have on the nature and the ecology."*

The neighbourhood policing team have commented that they feel there is not a compelling case for introducing additional lighting in Sandford Park in order to reduce Anti Social Behaviour.

### 3.3 The Friends of Sandford Park

The Friends of Sandford Park have undertaken their own assessment, and support some additional lighting, but limited to the friendship circle. They would like to see existing lighting along the cycle path improved, and have offered to manage vegetation through existing volunteer work parties in areas of the park where natural surveillance could be improved. They recognise the need to maintain dark areas of the park, and would like to see the path network improved in the vicinity of the boules piste.

### 3.4 Ecology

Plants and animals depend on Earth's daily cycle of light and dark rhythm to govern life-sustaining behaviours such as reproduction, nourishment, sleep and protection from predators. Scientific evidence suggests that artificial light at night has negative and deadly effects on many creatures including amphibians, birds, mammals, insects and plants.

The Council is currently working the University of Gloucestershire who will be undertaking a bat survey in the park shortly to identify populations and habits.

### 3.5 Cheltenham Carbon Zero Considerations

Each of the existing park lanterns are rated at 19 watts and over a year burn for about 4070 hours, consuming in the region of 48KW per hour.

## 4. Community safety across the borough

- 4.1 As the petition highlighted the important issue of crime and the fear of crime, the Leader of the Council facilitated a meeting of key stakeholders including the Police and Crime Commissioner, the MP, Gloucestershire County Council and the Borough Council Portfolio lead for Communities & Safety. The Leader outlined her view on this via Leader Communications at Council on 21st March 2022;

*"She advised that receipt of a 750-signature petition at the March Council meeting, concerning women's safety and lighting of Sandford Park and other public areas, together with other active petitions raising similar concerns, would trigger a council debate. Although the council doesn't have direct control over the wider issues of safety, she confirmed that it should have an active*

*role and that, in order to ensure a meaningful debate, she had arranged a meeting with the PCC, Cheltenham's MP, and GCC and CBC cabinet members for safety. The first available meeting for the Council debate is June; she reassured Members that the issue of safety is extremely important and not taken lightly, but could not be achieved by CBC alone – it needed government intervention and work with partners."*

**4.2** At this meeting of stakeholders, there was agreement that partnership working was vital on the issue of community safety. Critical partners include:

- Gloucestershire Constabulary in terms of enforcement, intelligence and data gathering
- Criminal Justice system
- Education providers
- County Council (highways)/Borough council for lighting on highways CCTV Etc.

**4.3** Actions arising from the meeting included:

- Police and Crime Commissioner and Cheltenham Borough Council to continue working to develop shared outcomes through the work of Safer Gloucestershire and the Cheltenham CSP and any subsequent bidding activity
- Police and Crime Commissioner to provide data and intelligence on crime trends (including in relation to parks connected to the petition)
- Relevant Gloucestershire County Council Cabinet member to be engaged
- Recognition that other mechanism going through Parliament such as the Online Safety Bill are other important measures to review

## **5. Reasons for Recommendations**

**5.1 To recognise the shared endeavours needed across partners to tackle the wider issue of community safety across the borough**

**5.2 To acknowledge the need to address light pollution and maintain dark skies; and the detrimental impact it will have on the nature and the ecology our parks and green spaces.**

**5.3 Reinforcing that proactive management of landscape features across our parks and green spaces will improve security by increasing sight lines and natural surveillance, in line with Crime Prevention through Environmental Design principles.**

**5.4 Undertaking a review of existing lighting where required, will determine if the current lights are still suitable for their intended purpose by today's standards**

**5.5 To support the review of existing lighting in Sandford Park**

**5.6 To identify funding for any future lighting improvements in Cheltenham's Parks and assess this within the context of the impact on nature and ecology**

|                      |   |
|----------------------|---|
| <b>Report author</b> | <b>Contact officer:</b> <a href="mailto:adam.reynolds@cheltenham.gov.uk">adam.reynolds@cheltenham.gov.uk</a> , Green spaces manager   |
| <b>Appendices</b>    | <ol style="list-style-type: none"> <li>1. Process for dealing with a petition at council</li> <li>2. Risk assessment</li> <li>3. Sandford Park Crime Prevention Assessment from Gloucestershire Constabulary</li> </ol> |

|                               |   |
|-------------------------------|---|
| <b>Background information</b> | <ol style="list-style-type: none"><li>1. Council's petition scheme – report to Council 13 May 2010</li><li>2. Leaders Communications – Council 21<sup>st</sup> March 2022<br/><a href="https://democracy.cheltenham.gov.uk/ieListDocuments.aspx?CId=143&amp;MId=3337&amp;Ver=4">https://democracy.cheltenham.gov.uk/ieListDocuments.aspx?CId=143&amp;MId=3337&amp;Ver=4</a></li></ol> |
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## **Process for dealing with petitions at Council**

The following is the recommended process to be followed for the debate of a petition at the Council meeting in accordance with the Council's Petition Scheme. The Council Procedure Rules shall be suspended in so far as necessary to facilitate this process.

### **1. The Mayor will remind members of the procedure to be followed**

### **2. Statement by the petition organiser**

The Mayor will invite the petitioner organiser or their representative to come to the microphone and speak for up to 5 minutes on the petition.

There will be no questions and the petition organiser/their representative will take no further part in the proceedings.

### **3. Clarification on the background information in the officer's report**

Members will be invited to ask any questions for clarification as to the facts in the officer's report.

### **4. Statement by the relevant Cabinet Member**

The Cabinet Member whose portfolio is most relevant to the petition will be invited by the Mayor to speak for a maximum of 5 minutes on the subject of the petition. They may wish to refer to the background report from officers circulated with the papers for the meeting.

They may also wish to propose a motion at this point; if so, the motion must be seconded.

### **5. Debate by members**

Where a member has proposed a motion (which is seconded), the usual Rules of Debate (Rule 13) will apply.

If there is no motion, the Mayor will invite any member who wishes to speak on the petition to address Council for up to a maximum of 3 minutes.

When the 15 minutes set aside for the debate (as laid down in the Council's Petition Scheme) is up, the Mayor may decide to extend the time allowed for the debate but will bring it to a close when they feel sufficient time has been allowed.

### **6. Conclusion of Debate**

The debate should conclude with one or more decisions taken pursuant to the Petition Scheme as follows:

- Taking the action requested in the petition (provided the matter is reserved to full council for decision);
- Referring the matter to Cabinet or an Appropriate Cabinet Member or Committee (including Overview and Scrutiny) for further consideration;
- Holding an inquiry into the matter;
- Undertaking research into the matter;
- Holding a public meeting;
- Holding a consultation;
- Holding a meeting with petitioners;
- Calling a referendum;
- Writing to the petition organiser setting out our views about the request in the petition;
- Taking no further action on the matter.



| The risk  |   |  |             | Original risk score<br>(impact x likelihood) |                |       | Managing risk |  |          |                     |                                   |
|---|---|--|-------------|--|----------------|-------|---------------|--|----------|---------------------|-----------------------------------|
| Risk ref.   | Risk description  | Risk Owner                               | Date raised | Impact 1-5                                   | Likelihood 1-6 | Score | Control       | Action   | Deadline | Responsible officer | Transferred to risk register      |
|   | If the Council does not address safety, and people perception of safety in green space, then it may deter sectors of the community using green space      | Director Climate Change & Place Services | 13/05/2023  | 4  | 1              | 4     | Yes           | Continue to ensure green spaces are maintained to take account of Crime Prevention through Environmental Design principals | Ongoing  | Green Spaces Manger | Transferred to team risk register |
|   | If the Council doesn't carefully consider the effect of lighting on fauna and fauna then it may have a detrimental impact on biodiversity in green spaces | Director Climate Change & Place Services | 13/05/2023  | 4  | 1              | 4     | Yes           | Lighting schemes in green space should consider local wildlife habitats when being planned                                 | Ongoing  | Green Spaces Manger | Transferred to team risk register |
| <b>Explanatory notes</b><br><b>Impact</b> – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)<br><b>Likelihood</b> – how likely is it that the risk will occur on a scale of 1-6<br>(1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)<br><b>Control</b> - Either: Reduce / Accept / Transfer to 3rd party / Close |   |  |             |  |                |       |               |  |          |                     |                                   |

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**Sandford Park Crime Prevention Assessment from Gloucestershire Constabulary**

Following receipt of the petition the Council's Green Space Team asked the Crime Prevention Design Advisor at Gloucestershire Constabulary to undertake a Crime Prevention Assessment of Sandford Park.

**Assessment Prepared by the Crime Prevention Design Advisor:**

The petition has focused researched initially conducted 20-30 years ago. The Painter and Farrington papers explore the levels of crime 12 months before the installation of new street lighting, and compares with the following 12 months.

Both studies concentrated on urban streets and focussed on the following crime types

- Burglary
- Vandalism/outside theft
- Vehicle crime
- Cycle theft
- Robbery/snatch theft
- Assault
- Threats/pestered

They identified that improving street lighting in these areas increases natural surveillance and discourages burglary and theft.

In September 2008 a systematic review of Street light was written by Welsh + Farrington, entitled 'Effects of Improved Street Lighting on Crime'. This research was used by the College of Policing in 2015 as part of their What Works toolkit.

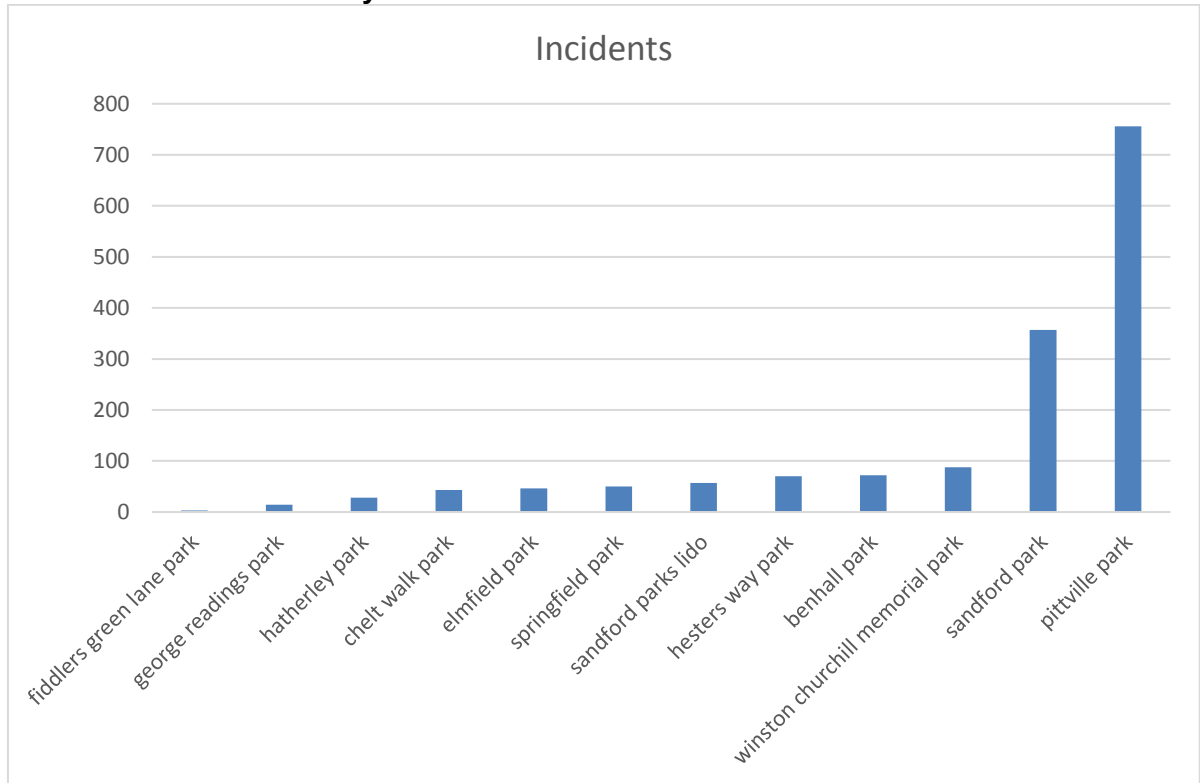
This systematic review of 13 previous studies for the United States of America and Great Britain. Their findings highlighted the reduction in burglary and theft, and a decrease in violent crimes within housing estates.

The petition explains extra lighting would save money in the long term, however this is based on the number of burglaries and thefts in residential areas. In the areas described in each research paper, the local authority had already approved the increase in light, so the cost was never a consideration.

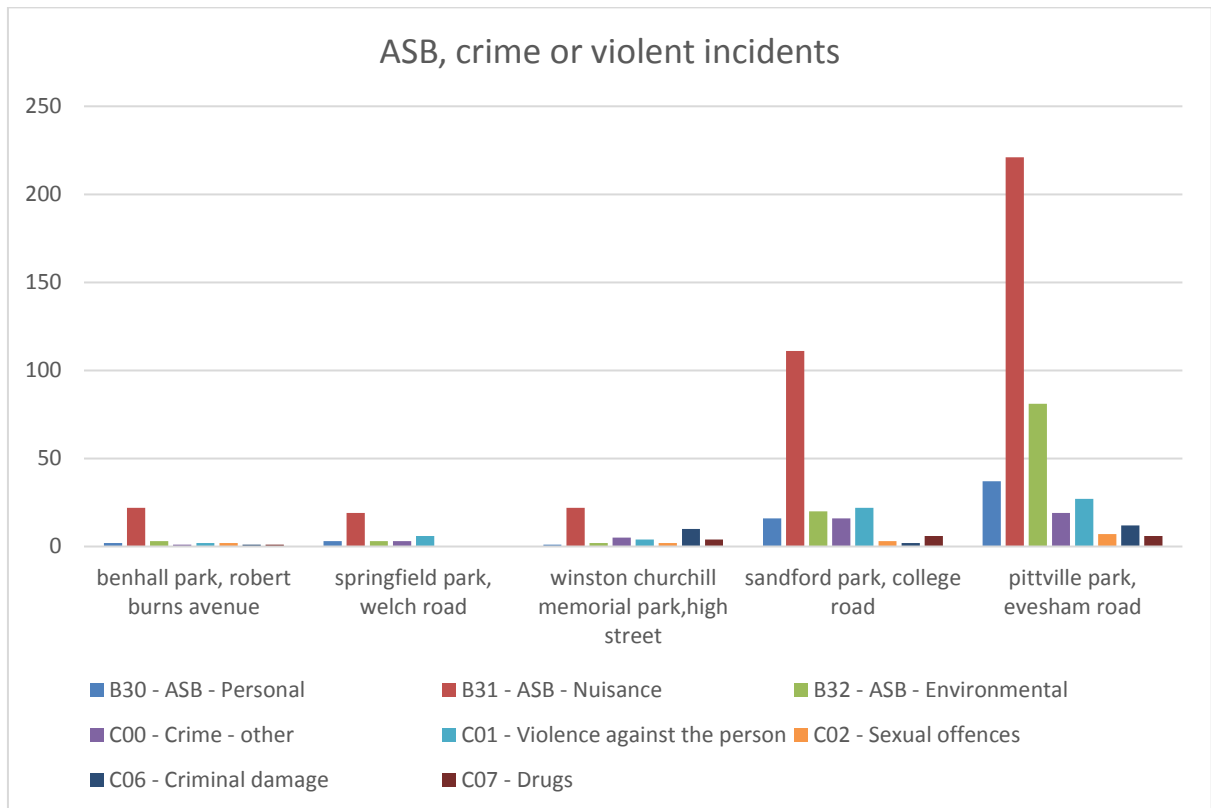
Financial values were then added and the potential savings calculated. Everyone would see the benefits of the lighting, but no one would actually see a financial gain.

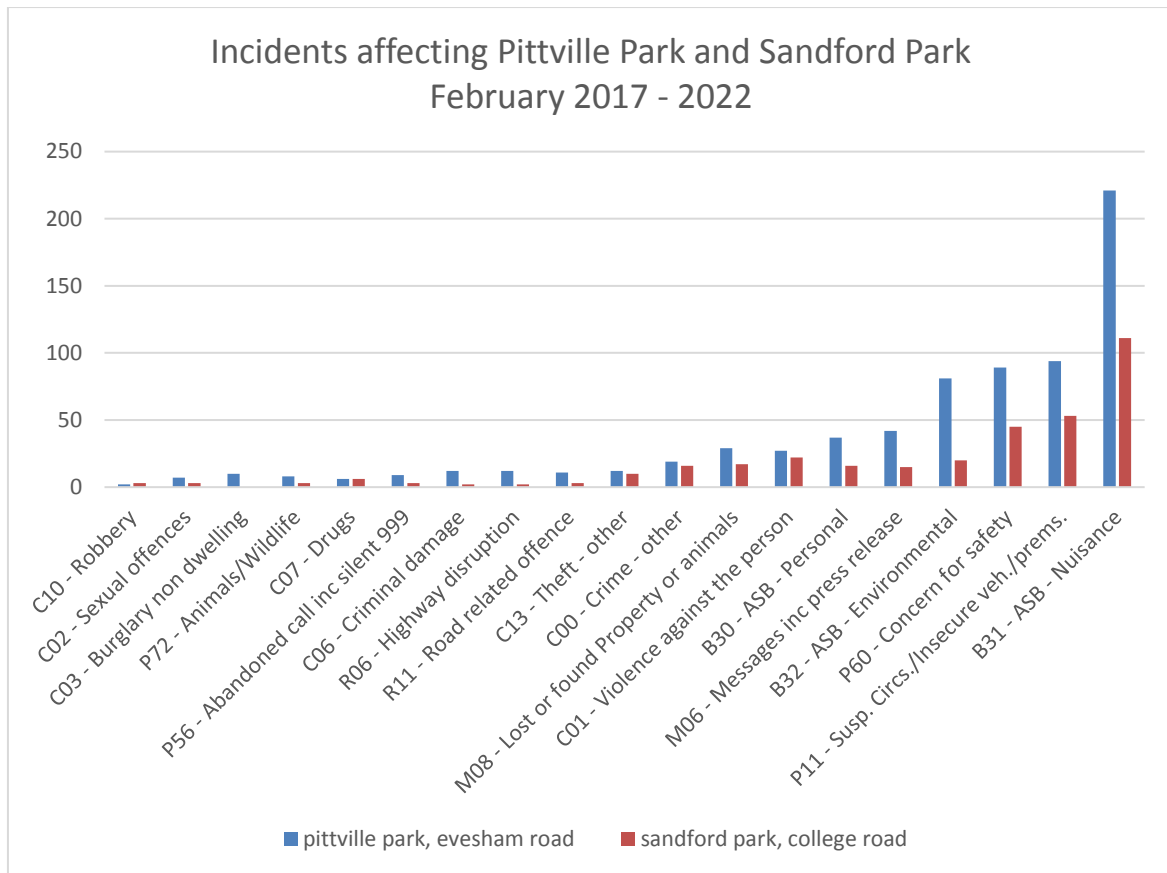
Academic research relating to parks and public open spaces is very limited, but the academic research regarding the principles of Crime Prevention through Environmental Design (CPTED) has been discussed more openly following the tragic death of Sarah Everard.

## Crime and incident history

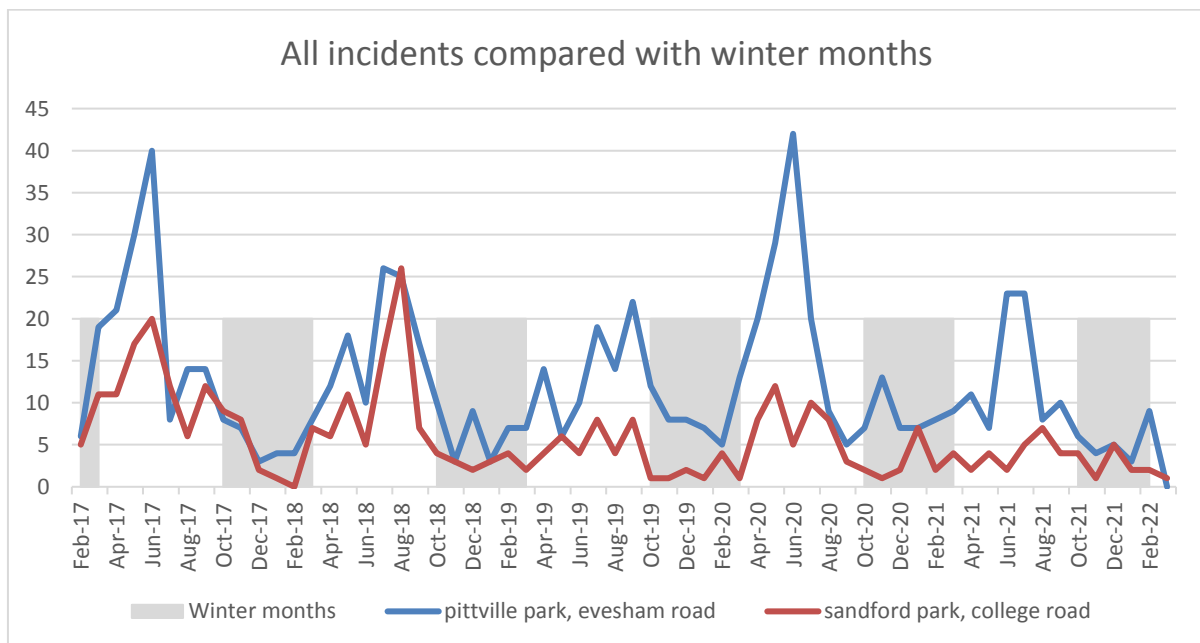


Each park within Cheltenham was included in this assessment covering the past 5 years, both Sandford Park and Pittville Park show the highest number of reported incidents.



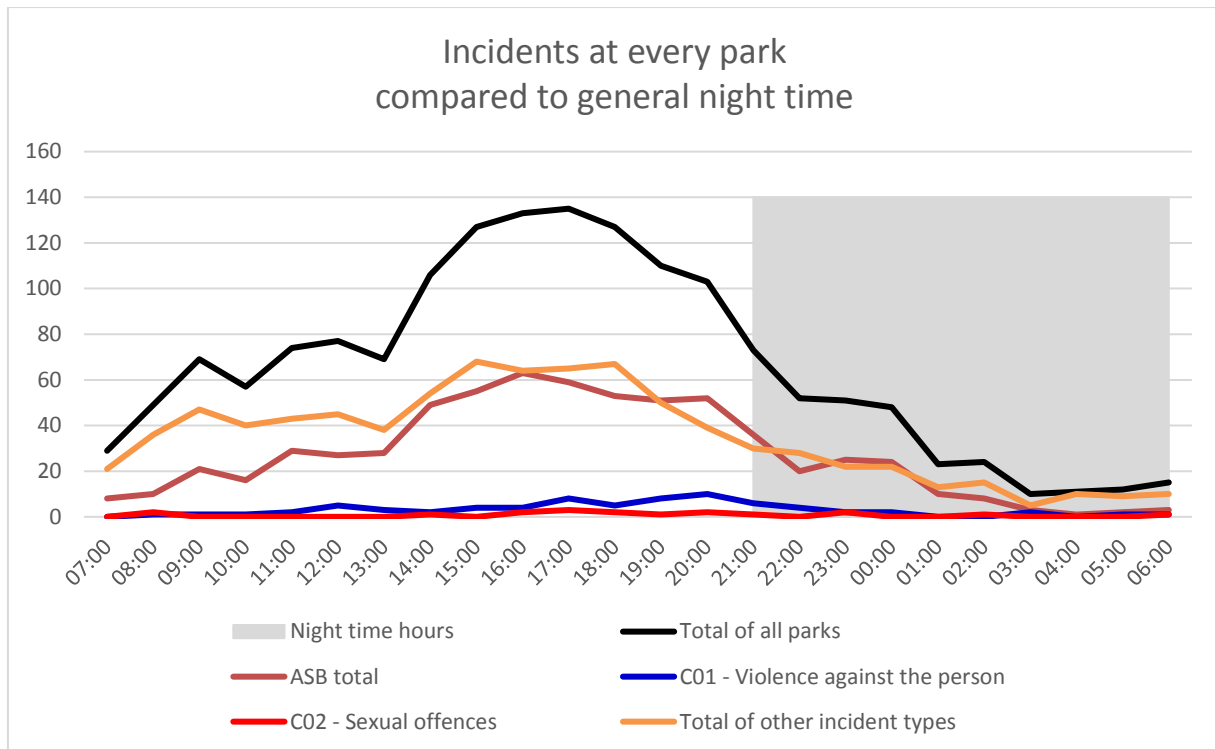


Although the petition is focused on Sandford Park, the results detailing Pittville Park would suggest that every park and public space in Cheltenham needs to be considered.



The affects winter can have on Incident reporting within the two main parks, it also demonstrates the effects of the first Covid lock down that started in April 2020.





By comparing the various incidents, it's possible to separate ASB, Violence and Sexual offences. All other offences have been combined and closely match ASB.

The monthly break down of incident and the hourly assessment suggests most issues occur during the daytime hours of the summer months. As the majority of the incidents related to ASB, would the provision of extra light encourage this behaviour through the night? Could the winter weather and the dark discourage people using the park or public space? Would the reports remain low because no one is there to report the criminal activity?

Before additional lighting is proposed in any park, it would be useful to

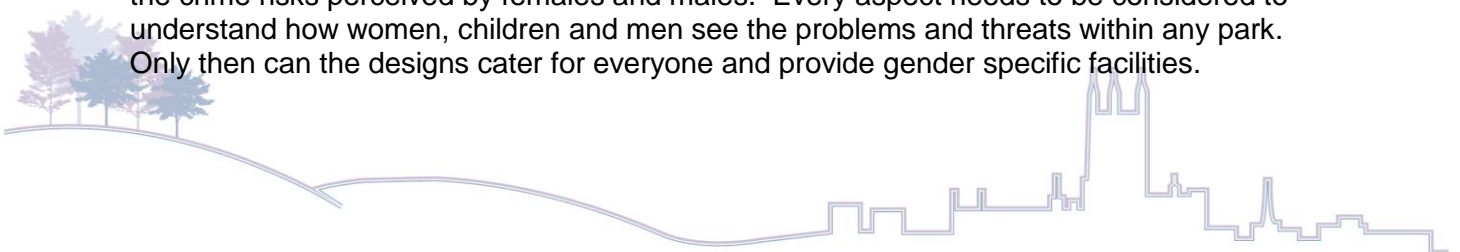
- Produce a detailed assessment and Lux plan of the current lighting.
- Identify if the tree canopy and other foliage is adding to the problem and if it needs pruning.
- Understand the ecology and ecosystem of each park or public space, and understand the impact additional lighting or human activity may have.

Crime Prevention and Community Safety require more than simply improving the lighting, a multitude of other elements need to be considered.

**Horrifying public crimes can, and do, occur in well-lighted subway stations when no effective eyes are present. They virtually never occur in darkened theatres where many people and eyes are present.** Jane Jacobs, *The Death and Life of Great American Cities*

Poor designs can also create a false sense of safety, which in turn would place an individual at risk. Any crime prevention initiative needs to be carefully planned, looking at every aspect of the park and how it is used; considering every option and the impact it will have on the other crime prevention measure, community and the environmental ecosystems.

To reduce **Violence against Women and Girls (VAWG)** any design needs to understand the crime risks perceived by females and males. Every aspect needs to be considered to understand how women, children and men see the problems and threats within any park. Only then can the designs cater for everyone and provide gender specific facilities.



The design and remodelling of any park is a serious commitment to improve the environment and reduce crime, but one of the key factors that cannot be controlled is the final use. If and how the community with use this public space.

Activity is a fundamental element of crime prevention, people using the parks creates a sense of ownership which in turn develops respect and appreciation. With more using this public space, natural surveillance is increased which reduces crime and anti-social behaviour.

To understand how the parks are currently used and what could be changed, it would be useful to know

- Who uses or visits all the parks.
- If people would like to use the park at night, no point making changes if it's not needed.
- Would specific groups want to use the park and for what purpose.
- Understand why people don't wish to use the park at night? Fear of crime, too dark, etc.
- Identify activities that would increase visitor numbers after dark.

The proposed addition of more artificial lighting through the parks needs to address the delicate balance between visitor numbers and the need to reduce crime; the need to address light pollution and maintain dark skies; and the impact it will have on the nature and the ecology.

If the current petition is taken forward, the changes to the park could be partly funded by the Central Government funding scheme 'Safer Streets'. As with any public bids for funding, this process is never certain. Should this funding be considered by Cheltenham Borough Council, then the Conservative Police and Crime Commissioner would need to get involved and submit the application on your behalf.

Prepared by  
Crime Prevention Design Advisor  
Gloucestershire Constabulary

Research described in the Petition

**Street Lighting and Crime: Diffusion of Benefits in the Stoke-On-Trent Project** – Kate Painter and David Farrington, Cambridge University 1992-3

**The financial benefits of improved street lighting, based on crime reduction** – Kate Painter and David Farrington, British Journal of Criminology 2001 combined the results of Stoke-on-Trent and Dudley.

**Effects of Improved Street Lighting on Crime** - Welsh + Farrington 2008



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## Cheltenham Borough Council

Council – 20<sup>th</sup> June 2022

### Community Infrastructure Levy Governance & Section 106 engagement

|                                 |   |
|---------------------------------|---|
| <b>Accountable members</b>      | <p>Leader – Cllr Hay</p> <p>Cabinet Member Customer &amp; Regulatory Services – Cllr Horwood</p>  |
| <b>Accountable officer</b>      | Tracey Birkinshaw – Director Community and Economic Development   |
| <b>Ward(s) affected</b>         | All   |
| <b>Key/Significant Decision</b> | Yes   |
| <b>Executive summary</b>        | <p>The Council needs to establish a clear CIL Governance Structure to oversee the council's approach to the investment of both legacy and future CIL monies. The report sets out the key governance arrangements for the delivery of infrastructure through CIL to ensure CIL serves its purpose of contributing to the delivery of the infrastructure necessary to support development in Cheltenham. The following recommendations were agreed unanimously by Cabinet 5<sup>th</sup> April 2022 and this report asks Council to endorse the resolution by Cabinet.</p> <ol style="list-style-type: none"> <li><b><i>The percentage split of CIL, in accordance with the CIL Regulations as set out in Fig 1, be noted;</i></b></li> <li><b><i>The governance approach for the strategic (non-neighbourhood) CIL monies be agreed, including the preparation of the Infrastructure List as set out at section 2 of this report, and engagement with Gloucester City Council and Tewkesbury Borough Council on any shared infrastructure spending, which ensures that the Cheltenham Cabinet and Council has final approval;</i></b></li> <li><b><i>Collaborative work be undertaken with Gloucester and Tewkesbury Councils on developing a spending mechanism for any shared CIL spending to be agreed by Cheltenham Cabinet and Council;</i></b></li> <li><b><i>The governance approach as set out at section 4 of this report in regard to the unparished neighbourhood element of CIL be agreed;</i></b></li> <li><b><i>The Head of Planning, in consultation with the Cabinet portfolio holder and Head of Finance, undertake an annual review of the CIL administration element and for this spending to be agreed annually by Cabinet as part of the Infrastructure Statement Annual Report;</i></b></li> </ol> |

|                               |   |
|-------------------------------|---|
|                               | <p><b>6.     <i>The proposal as set out in section 6 of this report to build enhanced transparency and engagement with ward members on S106 be agreed.</i></b></p> <p>Since the writing of the Cabinet report, the Government has now published the Levelling Up and Regeneration Bill. The detail of this relating to Section 106 Agreements (S106) and CIL is referenced in section 7 of this report. Detail and any impacts arising is at this time limited, however, Regulations brought forward as part of this Bill will result in changes. Any impacts affecting our processes will be reported back to Cabinet.</p> |
| <p><b>Recommendations</b></p> | <ol style="list-style-type: none"> <li><b>1.     To endorse the recommendations agreed by Cabinet 5<sup>th</sup> April 2022 as set out in section 8 of this report and listed in the Executive summary above.</b></li> <li><b>2.     Officers to keep under review Regulations arising from the Levelling Up and Regeneration Bill and to report back to Cabinet as required.</b></li> </ol>  |

|  |   |
|--|---|
| <b>Financial implications</b>  | <p>None arising from this report.</p> <p>Contact officer: Accountant Business Partner<br/> <a href="mailto:andrew.taylor@cheltenham.gov.uk">andrew.taylor@cheltenham.gov.uk</a></p>   |
| <b>Legal implications</b>  | <p>Regulation 61 of the Community Infrastructure Levy Regulations (“the regulations”) allows charging authorities collecting CIL to spend up to 5% of their total levy receipts on administrative expenses. Depending on whether there is a adopted neighbourhood development plan either up to 15% (capped according to the formula in regulation 59A) or 25% of relevant CIL receipts are to be allocated as the neighbourhood portion, being passed to relevant Town and Parish Councils where they exist.</p> <p>If there is no parish or town council, the charging authority will retain those levy receipts, but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding.</p> <p>The remaining element of CIL receipts must be spent on infrastructure. Charging authorities can choose to pool a proportion of their Community Infrastructure Levy (CIL) receipts to fund infrastructure including for out of their own area spending. Each of the charging authorities included in the pooling arrangements should be content that funding for infrastructure outside the authority’s area will support development of its own area.</p> <p>Under national Planning Policy Guidance charging authorities are encouraged to consider publishing a memorandum of understanding detailing the administration, principles, and governance that will be implemented for any pooled fund, covering, but not limited to :</p> <ul style="list-style-type: none"> <li>• a proposed governance structure and decision-making process for agreeing how the pooled fund is implemented and spent;</li> <li>• the proportion or amount of levy each charging authority will contribute;</li> <li>• the procedure for collecting the pooled levy;</li> <li>• the strategic infrastructure projects the pooled fund will be spent on, governed by the 2019 amendment regulations requirement to publish an ‘Infrastructure List’;</li> <li>• a system for returning pooled funds to an authority in the event that it is necessary to do so;</li> <li>• a proposed review mechanism for the memorandum.</li> </ul> <p>It is further recommended that the memorandum of understanding is a publicly accessible document, which clearly explains how the pooled levy will be administered and spent.</p> <p>The Authority has a variety of legislative powers to set up governance arrangements, including the general power of competence set out in Section 1 of the Localism Act.</p> <p><b>Contact officer:</b> One Legal, <a href="mailto:legal.services@onelegal.org.uk">legal.services@onelegal.org.uk</a></p> |
| <b>HR implications (including learning and organisational development)</b> | <p>None arising from this report</p> <p><b>Contact officer:</b> HR Business Partner, Publica<br/> <a href="mailto:georgie.tewdell@publicagroup.uk">georgie.tewdell@publicagroup.uk</a></p>  |

|  |  |
|--|--|
| <b>Key risks</b>                                     | See Appendix 1.  |
| <b>Corporate and community plan Implications</b>     | None directly  |
| <b>Environmental and climate change implications</b> | None directly  |
| <b>Property/Asset Implications</b>                   | <p>None arising from this report</p> <p><b>Contact officer:</b> Director of Finance and Assets<br/> <a href="mailto:Gemma.Bell@cheltenham.gov.uk">Gemma.Bell@cheltenham.gov.uk</a></p> |

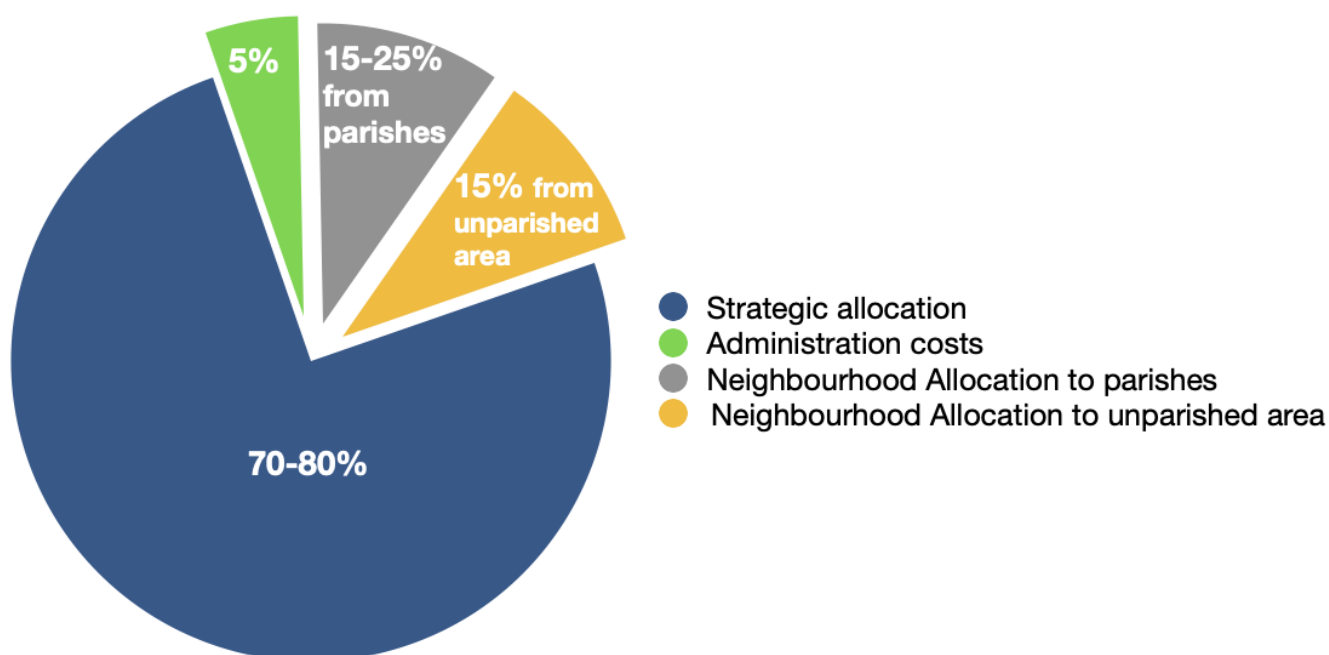
## 1. Background

- 1.1 The Community Infrastructure Levy (CIL) is a charge which local authorities can place on developers to help fund infrastructure needed to support new development in their areas. CIL is governed by the CIL Regulations 2010 (as amended).
- 1.2 Cheltenham Borough Council approved the introduction of CIL on 15<sup>th</sup> October 2018 with commencement of charging on planning applications granted permission on or after 1<sup>st</sup> January 2019.
- 1.3 CIL is paid to the Council by developers after their planning permissions commence, in line with the Council's adopted Instalments Policy. CIL is a significant means outside wider government funding by which the Council is able to collect and pool developer contributions to deliver infrastructure improvements.
- 1.4 In December 2021, Cabinet received a report on the annual Infrastructure Funding Statement (IFS). As part of this report, the need to put in place CIL governance was highlighted. This report takes forward the detail.
- 1.5 As per the CIL Regulations and Guidance, CIL is proportioned and allocated using the following approach:
  - A maximum of 5% is retained by Cheltenham Borough Council to cover administrative costs (this is clearly prescribed in the CIL regulations and includes charging, collecting and enforcing CIL, reviews, appeals and debt collection including legal costs. It includes distribution, monitoring, enforcement and reporting on CIL activity). Currently Cheltenham pools its 5% with Gloucester and Tewkesbury Councils and currently the amount pooled does not fully cover the joint CIL administration incurred. However, over time as the CIL pots grow, this will not be the case and Cheltenham will wish to fully recover all liable costs, both joint and those arising from Cheltenham only.
  - 15% - 25%, known as the Neighbourhood Allocation, is for spending within the neighbourhood of contributing development (in the case of the 15% that a Parish Council, without an adopted Neighbourhood Plan, must receive, this is up to a maximum of £100 per existing Council Tax paying dwelling). This allocation must be transferred to the relevant parish council or an uncapped 15% is retained by the Borough Council to be spent on neighbourhood projects where the development is not in a parish. The transferred allocation rises to an uncapped 25% when a parish or Neighbourhood Forum has a 'made' (adopted by Borough Council) Neighbourhood Plan in place. At the present time, no Cheltenham parish or forum has a Neighbourhood Plan in place, although plans are being developed at Hesters Way Neighbourhood Forum and Leckhampton with Warden Hill Parish Council.
  - The remainder (around 70% - 80%), known as the 'Strategic' or 'Infrastructure' Allocation, is retained by Cheltenham Borough Council to allocate to infrastructure projects. This should reflect our plan making which includes the Cheltenham Plan and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). We have a continued commitment to prepare a new development plan for the Gloucester, Cheltenham and Tewkesbury area, this is currently subject to rebranding to reflect changes to the National Planning Policy Framework (NPPF) and now titled the Gloucester, Cheltenham and Tewkesbury Joint Strategic Plan (JSP). The delivery of the existing JCS and future JSP sits alongside the delivery of the Cheltenham Plan. As per the legal advice above, a Memorandum of Understanding with the other authorities should specify the proportion or amount of levy each charging authority will contribute to the pooled fund.
  - This report seeks support for the recommendations agreed by Cabinet on the 5<sup>th</sup> April 2022 which includes approval of the establishment of a Strategic CIL Board and

supporting Infrastructure List for any strategic infrastructure spending shared with the other councils, to be agreed by Cheltenham Cabinet and Council. The other JSP Councils will be making decisions as appropriate through their own constitutional processes.

This breakdown is summarised in Fig.1.

**Fig 1 – Breakdown of CIL as aligned with CIL Regulations**



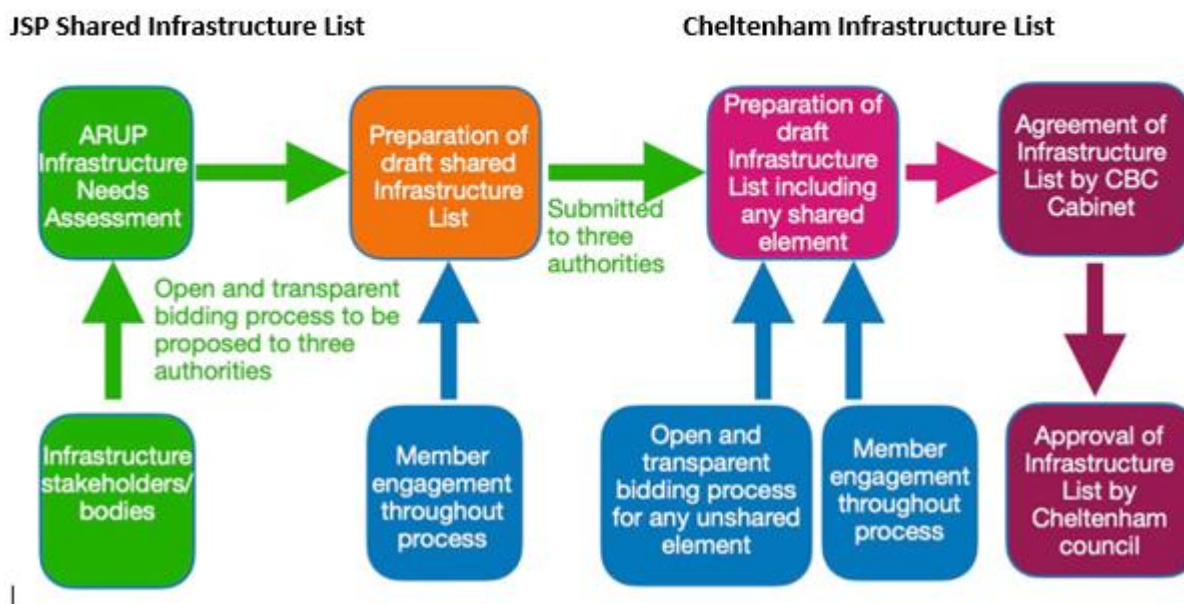
## 2. Infrastructure List

- 2.1 An Infrastructure list has to be included within the Infrastructure Funding Statement or IFS. Our first IFS was approved by Cabinet in December 2020.
- 2.2 As reported to Cabinet via the annual IFS in December 2021, our current Infrastructure List does not fully represent our priorities, including tackling climate change, facilitating modal shift away from the private car and changing patterns of work in the aftermath of the Covid-19 pandemic.
- 2.3 The Infrastructure list is essentially a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL. To distinguish this clearly from the neighbourhood allocation of CIL, the Infrastructure List could cover items such as;
  - schools
  - roads and transport
  - healthcare and medical facilities
  - open spaces and facilities for sport and recreation
  - flood management
- 2.4 The Infrastructure List presented in December 2021 was a shared Infrastructure List with Gloucester and Tewkesbury developed through the JCS process. This report proposes a Cheltenham governance process that allows for such a shared Infrastructure List and as per National Planning Policy Guidance, this will include agreement by Cabinet and Council of a Memorandum of Understanding that will specify the proportion or amount of CIL each council will

contribute and the strategic infrastructure projects the pooled fund will be spent on. A process for drawing up this Shared Infrastructure List is set out below. This report sets out Cheltenham's governance approach; the other JSP Councils will be making decisions as appropriate through their own constitutional processes.

- 2.5 If the agreed Memorandum of Understanding specifies that 100% of Strategic CIL is to be pooled, then the Cheltenham Infrastructure List and the Shared Infrastructure List will be the same. If the proportion or amount is less than 100%, then the Cheltenham Infrastructure List will comprise whatever Shared Infrastructure List is agreed in addition to any proposed infrastructure spending from strategic CIL monies retained by Cheltenham.
- 2.6 Any Cheltenham Infrastructure List and/or Shared Infrastructure List will be agreed by Cabinet for proposal to Council and agreed by Council as set out in Fig 2 below. If at any stage the Infrastructure List requires amendment, the same level of approval will apply.
- 2.7 An open and transparent bidding process will be developed for any infrastructure stakeholder to propose relevant projects for the Infrastructure List that aid effective delivery of development. Should the proportion or amount to be pooled be 100% then we hereby propose this process to the three authorities. Should the proportion or amount pooled be less than 100%, we will conduct our own bidding process which will include an objective scoring process in compliance with national regulation and planning policy and local policy, conducted by the Head of Planning and based on a process approved by cabinet, who will prioritise a project or projects for inclusion in a Cheltenham Infrastructure List for approval by Council. In the event of more than one project being considered, Cabinet may take the advice of the CIL panel described in 4.4 below.

Fig 2 – Approval of Infrastructure List



### Shared Infrastructure List

- 2.8 Work is underway by the JSP councils to review the Shared Infrastructure List and we are currently developing the evidence base and engaging with infrastructure bodies to inform this. We are doing this alongside partners Gloucester City Council and Tewkesbury Borough Council as the assumption to date has been that this will represent pooled spending through the JCS/JSP to facilitate its delivery. This review, in order to justify the charges levied on developers, includes an 'Infrastructure Needs Assessment (INA)' and this is focussing on the delivery of the

development plan for our area through the remaining half of the plan period, to 2031. It is important that this assessment is evidence led and informed by engagement with infrastructure stakeholders. It is however equally important that members have clear oversight. As such, we are putting in place clear governance for this shared element of Infrastructure delivery as summarised in Fig 2. The INA is commissioned and being delivered by consultants ARUP and this will be a key part of the evidence informing the Infrastructure List but we will also propose an open and transparent bidding process forms part of the preparation process for the shared Infrastructure List, to be agreed through a Memorandum of Understanding.

- 2.9** The INA is a critical part of the evidence base alongside refreshed viability evidence that forms part of our programme for updating the Cheltenham CIL charging schedule. As work on establishing this evidence base continues a detailed programme for the consultation on, examination of and adoption of a new CIL Charging Schedule is currently being developed. It is anticipated that a draft CIL charging schedule will be presented to Cabinet to enable consultation early in 2023.

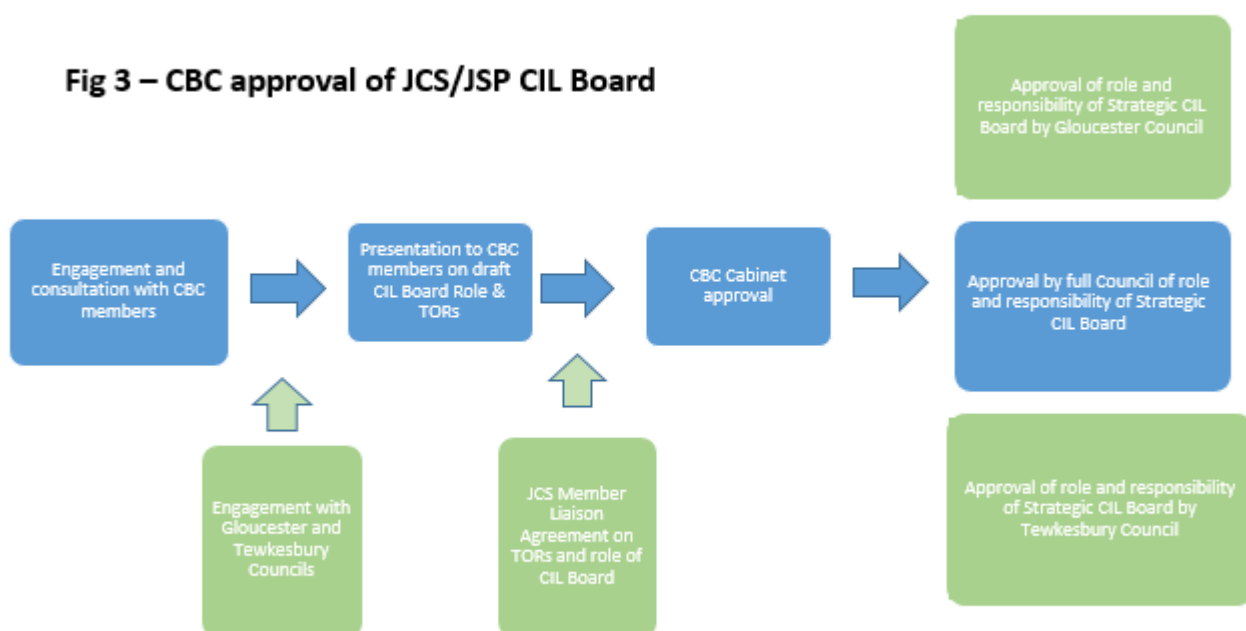
### **3. Governance Arrangements for shared element of the Strategic Allocation**

- 3.1** The majority of CIL funds (the strategic allocation), are retained by Cheltenham Borough Council for spending on infrastructure in accordance with the definition in the 2008 Planning Act (section 216). The expectation to date has been that 100% of this element will be pooled through the Joint Core Strategy process with Gloucester City Council and Tewkesbury Borough Council.
- 3.2** CIL receipts collected relate to development brought forward via the Councils development plan, which includes the Cheltenham Plan **and** the JCS/JSP **and** development arising from unallocated development (windfall sites). The strategic allocation is therefore relevant to strategic infrastructure required arising from the Cheltenham development plan as a whole that cannot be secured by way of Section 106 Agreement.
- 3.3** The Cheltenham CIL Charging policy and schedule was developed in collaboration with our partners Gloucester and Tewkesbury. This was informed by the Infrastructure Delivery Plan (IDP) prepared at that time and used to support the JCS examination and approval by the JCS Councils together with the subsequent approval of the Cheltenham Plan. The IDP is a key part of the evidence base informing the priorities and this is currently under review via the new INA, commissioned via the ARUP consultancy.
- 3.4** Under National Planning Policy Guidance charging authorities are encouraged to consider publishing a memorandum of understanding detailing the administration, principles, and governance that will be implemented for any pooled fund, covering, but not limited to :
1. a proposed governance structure and decision-making process for agreeing how the pooled fund is implemented and spent;
  2. the proportion or amount of levy each charging authority will contribute;
  3. the procedure for collecting the pooled levy;
  4. the strategic infrastructure projects the pooled fund will be spent on;
  5. a system for returning pooled funds to an authority in the event that it is necessary to do so;
  6. a proposed review mechanism for the memorandum
- 3.5** Cheltenham Borough Council Cabinet will agree and propose a Memorandum of Understanding to Cheltenham Council reflecting this guidance. This will include a proposal on the proportion or amount of the strategic element of the levy that is to be pooled. This may be 100% but this decision will be taken at that time not as part of these governance arrangements now.
- 3.6** Inevitably, there will be competing interests for the use of shared CIL to fund strategic infrastructure priorities; and as set out in the recommendation of this report Cheltenham Borough will work collaboratively with Tewkesbury and Gloucester Councils on a proposed Strategic CIL



Board at JSP level that will determine shared spending priorities within a framework that will prioritise CIL spend. This relates to the **strategic** element only within the definition of infrastructure as defined in the 2008 Planning Act.

- 3.7** Notwithstanding the importance of working collaboratively with Gloucester and Tewkesbury, as each of the councils are CIL authorities for their area, it is important that any approach to how a future JSP CIL Board will work and agreement on priorities is agreed by the individual councils. Lead officers and members will be working on the detail and this will be presented back to Cheltenham Cabinet and Council later this year for approval. Figure 3 below aims to set out the process of how this will be developed.
- 3.8** Recommendation 3 of the 5<sup>th</sup> April 2022 Cabinet report will deliver a proposed governance structure.



## 4. Governance Arrangements – The Neighbourhood Allocation

- 4.1** One of the purposes of CIL is to encourage communities to support growth and recognise that development can bring clear and identifiable benefits to an area. The CIL Regulations provide that a proportion of CIL collected from areas may be spent to address “the demands that development places” on a local area. This Neighbourhood Allocation of CIL must be allocated to Parish Councils where they exist. The amount of the Neighbourhood Allocation varies depending on whether there is a Neighbourhood Development Plan (NDP) in place that has been through a successful referendum and has been agreed as part of planning policy or ‘made’ by the local authority. In areas where this has happened 25% of the levy collected from development within the Neighbourhood area is available uncapped and elsewhere it is 15% but capped.
- 4.2** In areas without parish or town councils, the Neighbourhood allocation is retained by the local authority. This report concerns the governance and allocation of this portion of CIL. The regulations state that this portion of the CIL should be spent to support development in unparished areas, addressing the demands that development approved places on them. This does not preclude investment from this neighbourhood allocation within a parished area, but it must make a demonstrable contribution to addressing the demands that development has placed

on the unparished areas.

**4.3** The neighbourhood allocation of CIL can be used much more widely than the strategic allocation, provided it supports:

- The provision, improvement, replacement, operation or maintenance of infrastructure; or
- Anything else that is concerned with addressing the demands that development places on an area.

**4.4** This report proposes the following governance of this neighbourhood allocation via a Cheltenham CIL Neighbourhood Panel, the make-up and working summarised below.

|   |   |
|---|---|
| <b>Membership</b>                             | <ul style="list-style-type: none"> <li>• 7 elected members, ideally reflecting political balance and including at least some members from unparished areas.</li> <li>• quorate of Neighbourhood Panel being 4 with at least one cabinet member</li> <li>• Neighbourhood Panel Advised by Lead Leadership Team portfolio holder or delegated representative and Community Infrastructure Levy Manager</li> </ul>   |
| <b>Developing CIL projects for investment</b> | <ul style="list-style-type: none"> <li>• Consultation and engagement process to allow ward members and community organisations to present projects to be considered/explored as part of a live list of potential CIL investment projects</li> <li>• CBC officer team to contribute to identification of projects to be considered/explored as part of a live list of potential CIL investment projects</li> <li>• Principles which underpin allocation of funds, including a fair geographical distribution of awards within the areas impacted by development and key priorities for the Council including tackling deprivation and climate change</li> <li>• Clear demonstration of how the benefits of the project will be sustained in the long term, including any longer term revenue implications</li> </ul> |
| <b>Operation and decision making</b>          | <ul style="list-style-type: none"> <li>• Neighbourhood Panel on an annual basis identify a priority list of projects for investment informed by live list of potential CIL investment projects and recommend to Cabinet for approval</li> <li>• Neighbourhood allocation ring fenced for non parished areas. Any proposal for investment outside non parished areas will need to clearly define the demonstrable benefit to those communities.</li> <li>• Spending in accordance with the CIL Regulations and government guidance on CIL</li> </ul>   |
| <b>Monitoring and scrutiny</b>                | <ul style="list-style-type: none"> <li>• Neighbourhood panel meets in public to ensure all decisions are transparent and open to scrutiny</li> <li>• Chair of CIL Neighbourhood Panel attends Overview and Scrutiny once a year to answer questions on the decisions over allocations and to present a report evidencing the impact of allocations made with the investment.</li> <li>• Schemes should not have any unacceptable revenue or capital implications on the Council or any other body</li> </ul>  |

**4.5** The Neighbourhood Fund remains relatively modest as presented by the IFS to Cabinet in December 2021; this provides an opportunity to develop the 'live' CIL list, including engagement

with the communities in non-parished areas over 2022 with a view to the Neighbourhood Panel reviewing this ready for allocation in the next financial year.

### **5. CIL Administration**

- 5.1** Currently this is pooled with Gloucester and Tewkesbury Councils to cover core costs of delivery but as the Cheltenham CIL pot grows over the coming years and core joint costs are adequately covered, the Borough Council will review where any outstanding elements of the 5% is allocated to ensure effective delivery of CIL. This report recommends an annual review to determine the spend of this element of CIL and links this reporting back to Cabinet via the Annual IFS. It should be noted that the CIL Regulations provide clear guidelines on how this CIL administration funding can be spent and is strictly limited to the administrative functions of CIL with a requirement that the unspent balance of the 5% should be added to the Strategic Allocation.

### **6. Section 106**

- 6.1** Section 106 of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally-binding agreement or planning obligation with a landowner as part of the granting of planning permission. The obligation is termed a Section 106 agreement (S106), these are negotiated alongside the planning decision-taking process and should be concluded within the statutory timeframes of 8 weeks, 13 weeks for major development or a longer period agreed in writing between the applicant and local planning authority. A S106 allows negotiation of both physical on-site obligations and off-site financial contributions, when it is considered that a development will have negative impacts that cannot be dealt with through conditions in the planning permission.

- 6.2** Since 2010 it has been a legal requirement that that planning obligations may only constitute a reason for granting planning permission for the development if the obligation is:

1. necessary to make the development acceptable in planning terms;
2. directly related to the development; and
3. fairly and reasonably related in scale and kind to the development.

The Council generally negotiates contributions towards, but not limited to, the following:

- Affordable housing
- Community facilities
- Education
- Healthcare
- Highways and transport
- Open space, play areas and sports facilities
- Waste and recycling

- 6.3** S106 agreements are designed to help make sure that new developments enhance local communities and reduce the impact of developments by, for example:

1. Easing the impact of a new development on the local community, e.g. providing adequate public open space, improving infrastructure like bus stops
2. Compensating for any impact caused by a development - for example if public open space is lost
3. Ensuring that a certain proportion of houses on the development are provided as affordable housing

- 6.4** Members have asked for greater clarity and engagement in understanding the negotiation of S106. This report therefore recommends the following to further improve transparency and engagement;

1. Following review of the weekly list Ward members to notify the case officer of any application of interest and identify any known demands for infrastructure in the area.
2. Where an application is expected to result in the need for S106 negotiation, the case officer to notify the relevant ward members to enable engagement early in the application process.
3. Planning report templates to be updated to include a summary of S106 agreed, policy requirements met, schemes for which the contribution is secured, trigger points and values negotiated.
4. Member training on S106.

### 7. Levelling Up & Regeneration Bill

- 7.1 Members will be aware of the Planning Bill announced in the 2021 Queens Speech. We had a range of concerns which we articulated to Government about the changes proposed. In the Queens Speech 2022, the Planning Bill was scrapped and replaced by The Levelling Up and Regeneration Bill.
- 7.2 The Levelling Up and Regeneration Bill proposes a number of changes to existing planning legislation including local government, planning, and compulsory purchase. It follows on from the Levelling up the United Kingdom White Paper, which earlier this year set out the Government's objective to reverse geographical disparities between different parts of the United Kingdom by spreading opportunity across economic, social and environmental measures more equally.
- 7.3 Relevant to this report, the Bill includes measures to establish a new locally determined and mandatory levy to fund infrastructure which would effectively replace CIL (outside London) and S106. The levy will be charged based on the final gross development value of development and set as a percentage, this is in contrast to CIL which is charged based on the floor space of development when planning permission is granted. Linked to the levy, Local Planning Authorities will be required to prepare an 'infrastructure delivery strategy', which infrastructure providers will be required to assist with.
- 7.4 Based upon the Bill as drafted, detail in respect of implementation and potential reliefs is currently missing. This detail will unfold as we move to the Regulation stage. The Government has confirmed that it will put in place a transition plan for LPAs based on the expectation that the changes set out in the Bill will begin to have effect from 2024. Officers are engaged with peers locally and at national level and will be preparing further guidance for members in due course as more detail emerges.
- 7.5 Despite the changes proposed to S106 and CIL, there will still be a need for clear governance locally. We may need in due course to amend our processes to align with National Planning Guidance and best practice as it emerges, but the approach as set out in this report, relating to current process and regulations will provide a solid platform to transition to changes as and when required.

### 8. Resolution of Cabinet 5<sup>th</sup> April 2022

- 8.1 To ensure transparency and member engagement in decision-making, Cabinet received a version of this report. Cabinet resolved unanimously that:
1. ***The percentage split of CIL, in accordance with the CIL Regulations as set out in Fig 1, be noted;***
  2. ***The governance approach for the strategic (non-neighbourhood) CIL monies be agreed, including the preparation of the Infrastructure List as set out at section 2 of this report, and engagement with Gloucester City Council and Tewkesbury Borough Council on any shared infrastructure spending, which ensures that the Cheltenham Cabinet and Council has final approval;***

3. ***Collaborative work be undertaken with Gloucester and Tewkesbury Councils on developing a spending mechanism for any shared CIL spending to be agreed by Cheltenham Cabinet and Council;***
  4. ***The governance approach as set out at section 4 of this report in regard to the unparished neighbourhood element of CIL be agreed;***
  5. ***The Head of Planning, in consultation with the Cabinet portfolio holder and Head of Finance, undertake an annual review of the CIL administration element and for this spending to be agreed annually by Cabinet as part of the Infrastructure Statement Annual Report;***
  6. ***The proposal as set out in section 6 of this report to build enhanced transparency and engagement with ward members on S106 be agreed.***
- 8.2 The purpose of this report to Council is to seek endorsement of the Cabinet resolutions and in light of the Government proposals for changes to the planning system via the Levelling Up and Regeneration Bill, keep our processes under review.

#### **How this initiative contributes to the corporate plan**

- 8.3 Having a clear governance approach in place will help the council meet its priorities where impacted by infrastructure needs.

### **9. Consultation and feedback**

#### **9.1 Consultation undertaken with;**

- Cabinet
- Cabinet lead portfolio holders
- Leadership Team
- Planning & Liaison Member Working Group

### **10. Performance management – monitoring and review**

- 10.1 The Council has a statutory requirement to produce and publish an annual IFS.
- 10.2 Monitoring and reporting arrangements will be agreed in respect of both the strategic and neighbourhood allocation of CIL. The Council is pursuing improved use of its current IT reporting tool to assist with this.
- 10.3 Since the introduction of CIL legislation we have seen numerous amendments to the CIL regulations, as such it is important that we see our processes as living breathing ones that can adapt to be as efficient as possible and be responsive to best practice. This report sets out an approach to governance, which will require further decision-making later in 2022 on some detail. However, over time, we will keep under review our processes and this may result in further consideration by Cabinet.

|                               |   |
|-------------------------------|---|
| <b>Report author</b>          | <b>Tracey Birkinshaw, Director Community &amp; Economic Development</b><br><a href="mailto:Tracey.birkinshaw@cheltenham.gov.uk">Tracey.birkinshaw@cheltenham.gov.uk</a>   |
| <b>Appendices</b>             | 1. Risk Assessment  |
| <b>Background information</b> | <ol style="list-style-type: none"> <li>1. Infrastructure Funding Statement 2021<br/><a href="https://democracy.cheltenham.gov.uk/documents/s38868/2021_12_21_Infrastructure%20Funding%20Statement%20IFS%20Requirements_report.pdf">https://democracy.cheltenham.gov.uk/documents/s38868/2021_12_21_Infrastructure%20Funding%20Statement%20IFS%20Requirements_report.pdf</a></li> <li>2. Infrastructure Funding Statement 2020<br/><a href="https://democracy.cheltenham.gov.uk/documents/s34209/2020_12_01_Infrastructure%20Funding%20Statement_report.pdf">https://democracy.cheltenham.gov.uk/documents/s34209/2020_12_01_Infrastructure%20Funding%20Statement_report.pdf</a></li> <li>3. Cabinet Report 5<sup>th</sup> April 2022 – Community Infrastructure levy Governance &amp; Section 106 engagement<br/><a href="https://democracy.cheltenham.gov.uk/documents/s39870/2022_04_05_CIL%20governance%20and%20s106%20engagement_report.pdf">https://democracy.cheltenham.gov.uk/documents/s39870/2022_04_05_CIL%20governance%20and%20s106%20engagement_report.pdf</a></li> </ol> |

| The risk  |  |   |             | Original risk score<br>(impact x likelihood) |                |       | Managing risk |   |   |                                     |                               |
|-----------|--|---|-------------|--|----------------|-------|---------------|---|---|-------------------------------------|-------------------------------|
| Risk ref. | Risk description   | Risk Owner                                | Date raised | Impact 1-5                                   | Likelihood 1-6 | Score | Control       | Action  | Deadline                                    | Responsible officer                 | Transferred to risk register  |
| CIL       | Not having a clear CIL prioritisation of infrastructure projects may risk receipts not being targeted towards the most critical infrastructure needed to deliver development and fulfil our requirements in the delivery of the JSP (JSP) and Cheltenham Plan. | Director Community & Economic Development | 12.11.21    | 5  | 2              | 10    | Reduce        | Review of Infrastructure Delivery Plan as part of JSP preparation.<br><br>Put in place clear and transparent governance | In line with JSP programme                  | CIL Manager<br><br>Head of Planning | JSP and Service risk register |
| CIL       | Not having clear and transparent governance in place around the prioritisation and spend of CIL will risk funding not being spent on agreed infrastructure priorities  | Director Community & Economic Development | 03.03.22    | 5  | 2              | 10    | Reduce        | Put in place governance mechanisms  | April Cabinet 2022<br><br>June Council 2022 | Head of Planning                    | Service risk register         |

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**Cheltenham Borough Council**

**Council – 20 June 2022**

**Climate Change Supplementary Planning Document Adoption**

|                            |  |
|----------------------------|--|
| <b>Accountable member</b>  | <b>Cllr Alisha Lewis, Cabinet Member for Climate Emergency</b>   |
| <b>Accountable officer</b> | <b>Liam Jones, Head of Planning</b>  |
| <b>Ward(s) affected</b>    | <b>All</b>   |
| <b>Key Decision</b>        | <b>Yes</b>   |
| <b>Executive summary</b>   | <p>In 2019, CBC declared a Climate Emergency and set out to become a carbon neutral council and borough by 2030. To achieve this, a level of leadership from the Council will be essential in guiding businesses and communities towards the 2030 target.</p> <p>Buildings are responsible for almost half of the UK's carbon emissions and collective action is needed to reduce the negative environmental impacts from building developments. The existing planning regulations are not yet aligned with the Council's ambitions, nor do they provide the much needed hooks for local policy to underpin mandatory change.</p> <p>The purpose of this report is for the Council to adopt the Climate Change Supplementary Planning Document (SPD), having reviewed the analysis of the public consultation.</p> <p>The development of this SPD will help drive a proactive agenda for sustainable design and construction and pave the way for future policy changes as our development plans are reviewed.</p>   |
| <b>Recommendations</b>     | <p><b>It is recommended that Council:</b></p> <ol style="list-style-type: none"> <li><b>1. Adopts the proposed Climate Change SPD attached as Appendix 2.</b></li> <li><b>2. Delegates authority to the Head of Planning, in consultation with the Cabinet Member for Climate Emergency, to make any necessary further minor changes to the document;</b></li> <li><b>3. Commits to a programme of on-going training for Members and Officers about how to optimise use the SPD to help support the authority's 2030 net zero objectives;</b></li> <li><b>4. Commits to ensuring that emerging Development Plan Policy has appropriate policy hooks to better integrate the objectives of the SPD into the planning process, thereby giving the document greater weight in decision-making;</b></li> <li><b>5. Commits to using the SPD to lobby the Chief Planner and government through the Department for Levelling Up, Housing and Communities (DLUHC) and others, to urgently improve national policy and provide more effective measures to help combat climate change through the planning system.</b></li> </ol> |

|  |   |
|--|---|
| <b>Financial implications</b>  | <p>None arising directly from this report</p> <p><b>Contact officer: Gemma.Bell@cheltenham.gov.uk</b></p>   |
| <b>Legal implications</b>  | <p>The public consultation, and subsequent adoption of the Climate Change Supplementary Planning Document should be undertaken in accordance with the requirements set out within The Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p><b>Contact officer: Nick Jonathan <a href="mailto:nick.jonathan@tewkesbury.gov.uk">nick.jonathan@tewkesbury.gov.uk</a></b></p>  |
| <b>HR implications (including learning and organisational development)</b> | <p>None arising directly from this report</p> <p><b>Contact officer: Georgie Tweddell, HR Business Partner, Publica</b><br/> <a href="mailto:georgie.tweddell@publicagroup.uk">georgie.tweddell@publicagroup.uk</a></p>   |
| <b>Key risks</b>   | <b>As outlined in Appendix 1.</b>   |
| <b>Corporate and community plan Implications</b>                           | The SPD will directly contribute to the following key priority in the 2019-2023 Corporate Plan: “Achieving a cleaner and greener sustainable environment for residents and visitors”.   |
| <b>Environmental and climate change implications</b>                       | <p>The SPD will provide a tool to enable planning policy to drive the change we want to see from developers, in helping to tackle the impact of planned development on carbon emissions and the climate emergency.</p> <p>It will incorporate guidance on different aspects of sustainable design and construction, including energy and carbon, climate change adaption, water efficiency, flood prevention, pollution, sustainable transport, ecology, biodiversity net gain and waste reduction.</p> <p>The SPD will drive positive change and contribute to mitigating the negative environmental impacts of the property development industry.</p> |
| <b>Property/Asset Implications</b>   | <p>None arising from this report</p> <p><b>Contact officer: Gemma.Bell@cheltenham.gov.uk</b></p>  |

## 1. Background

### Climate Change Context

- 1.1** The Intergovernmental Panel on Climate Change's (IPCC's) special report on Global Warming, published in August 2021<sup>1</sup>, describes the enormous harm that a 2°C rise is likely to cause compared to a 1.5°C rise. The report went on to say that limiting Global Warming to 1.5°C may still be possible with ambitious action from national and sub-national authorities, civil society, the private sector, indigenous peoples and local communities. Additionally, the recent Intergovernmental Panel on Biodiversity and Ecosystem Services (IPBES) report stated that around 25% of the world's species are now at threat of extinction due to habitat loss and the effects of climate change<sup>2</sup>. Humanity is facing an unprecedented combination of crises in the natural systems we rely on.
- 1.2** The motion to declare a climate emergency was unanimously supported by full Council in February 2019 and subsequently endorsed by Cabinet in July 2019. The motion called on the Council to:
- Declare a 'Climate Emergency';
  - Pledge to make Cheltenham carbon neutral by 2030, taking into account both production and consumption emissions;
  - Call on Westminster to provide the powers and resources to make the 2030 target possible;
  - Work with other governments (both within the UK and internationally) to determine and implement best practice methods to limit Global Warming to less than 1.5°C;
  - Continue to work with partners across the town, county and region to deliver this new goal through all relevant strategies and plans;
  - Report to Full Council within six months with the actions the Council will take to address this emergency.
- 1.3** The Climate Emergency Action Plan (CEAP) (Appendix 4) was presented to full Council on 21<sup>st</sup> February 2022. The CEAP sets out a number of tangible actions required for CBC to reach the goal of becoming a net zero carbon council and borough by 2030. It is explicit in stating that CBC must take on a leading role in multiple scenarios, including the reduction of fossil fuel consumption and waste production within the borough. The production of a Climate Change SPD will support the requirements of the CEAP.
- 1.4** Buildings are responsible for almost half of the UK's carbon emissions, half of water consumption and about a quarter of all raw materials used in the economy. By encouraging new development in Cheltenham to reduce its environmental impact, planning can contribute significantly towards addressing the commitments in the Council's climate change emergency declaration. It can also be a vehicle for conveying the significance of the issue and the urgent need for action to reduce

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<sup>1</sup> <https://www.ipcc.ch/assessment-report/ar6/>

<sup>2</sup>

[https://ipbes.net/sites/default/files/inline/files/ipbes\\_global\\_assessment\\_report\\_summary\\_for\\_policymakers.pdf](https://ipbes.net/sites/default/files/inline/files/ipbes_global_assessment_report_summary_for_policymakers.pdf)

the current rate of increase of global heating.

### **The SPD Background**

- 1.5** CBC, like many local authorities, is frustrated that the planning regulations are not yet fit for purpose, nor do they provide the teeth needed to require mandatory change. The development of this Supplementary Planning Document (SPD) (Appendix 2) will help drive a proactive agenda for sustainable design and construction and help pave the way for future policy changes as our development plans are reviewed. Once adopted, we will also use this as a positive case study for further lobbying of government to drive change in policy at a national level. This is key given the recent publication of the Levelling Up and Regeneration Bill that indicates strengthening of national planning policies and reinforcing the role of development plans at the heart of local decision making.
- 1.6** It is important to understand that SPDs cannot introduce new targets that exceed current planning policy, but they can provide practical guidance and direction on how prospective applicants can comply with policy requirements and seek to proactively exceed these. The SPD will not form part of the development plan, but will be an important material consideration in decision-making. Our expectation is that this SPD elevates the issue of climate change and provides an active lever for developers and place makers to drive active change.
- 1.7** The SPD brings together local, national and international best practice, together with case studies. It incorporates guidance on different aspects of sustainable design and construction, including sections on energy and carbon, climate change adaption, water efficiency, prevention of flooding, pollution, sustainable transport, ecology, biodiversity including achieving net gain and waste. It also includes a checklist to prompt applicants to demonstrate how they are responding to climate change and related issues.
- 1.8** The SPD is intentionally ambitious. It builds on currently adopted policies, but it does so with necessity and purpose. Necessity, because we are all in the middle of a climate emergency that needs to be responded to as we plan for our existing communities and the future generations. Purpose, because we want to communicate the direction of our future policy and use the planning system positively as an enabler for change, which urgently needs to be consistent with a zero carbon future, helping to limit global temperature rises and to mitigate the impacts of climate change, including biodiversity loss.

### **SPD Procedure**

- 1.9** The procedure for preparing SPDs is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 12 requires that before a local planning authority can adopt an SPD, it has to prepare a statement setting out the persons it consulted when preparing the guidance, a summary of the main issues raised and how those issues have been dealt with in the SPD. There must then be a period of consultation (of no less than four weeks) on the draft SPD and the statement about its preparation.
- 1.10** It should be noted that, prior to public consultation, internal stakeholders and subject matter experts were consulted to help improve the accuracy of guidance and background information on each topic. Taking a multi-disciplinary and collaborative approach to address such a complex environmental problem as we believe, resulted in a holistic and well-informed document.
- 1.11** Public consultation ran for just over 4 weeks between 7 March 2022 and 4 April 2022. There were around 40 individual respondents and 133 separate comments. The consultation report in

Appendix 3 summarises the responses and shows how they have been taken into account.

- 1.12** The overall response was very positive and generally supportive of the document and its aims. The majority of the responses made suggestions for clarification of terminology, guidance for document utilisation and improved accuracy of content. This has resulted in a number of minor changes that have strengthened the document and will lead to better implementation of its guidance. Some clarity has been added as to what level of requirements are applicable to different scales of development.
- 1.13** A small number of responses were concerned that the SPD goes further than existing policy should allow and that it risks placing an unreasonable burden on developers. However, the objective of the SPD has not been diluted in response. As stated above, it is an ambitious document that sets out what this Council wants to see from new development in its administrative area. It is also clear that the national planning policy framework is not currently consistent with the scale of change required and we believe that urgently required changes will bring policy into closer alignment with the SPD over time.
- 1.14** Multiple responses stated the need to replace the national case studies with local examples from the region. This is seen as an important alteration to the document, to convey clearly to local developers and homeowner-developers that change is not only possible, but is already being achieved and that the ambitions set out in the SPD are therefore already within reach.
- 1.15** Ensuring solid application of the SPD by the Planning team will require investment in our teams through the provision of suitable and sufficient training together with ongoing training for elected members, in particular Planning Committee as decision makers.
- 1.16** The SPD will be supported by a public communications campaign and the leveraging of construction industry networks to disseminate the document, helping to embed the thinking within our local and development communities.

## **2. Reasons for recommendations**

- 2.1** The requirements of reaching net zero carbon by 2030 present a highly complex challenge and will not be achieved through Council action alone. Reducing greenhouse gas emissions will require 'systemic leadership' across multiple sectors, strong communications and behavioural change that will necessarily result in adapted lifestyles. As a Council, we have a responsibility to lead in this area, to ensure that Cheltenham plays a pivotal role in meeting this challenge to reduce our local impact on global warming, whilst also being aware of the major changes in weather-vulnerability and climate-sensitivity that will affect the services we deliver and the people we deliver them to. We also need to acknowledge our role in adapting to an already changed and changing climate and the fundamental leadership role the council has in ensuring Cheltenham is fit for the future. This SPD is tangible evidence of that leadership.
- 2.2** Cheltenham Borough Council declared the climate emergency in 2019 and set an ambitious target to become a net zero Council and Borough by 2030. A number of key work streams are underway and form part of the ambition outlined in our approved Climate Emergency Action Plan (CEAP); one of these is to approve a Climate Change Supplementary Planning Document.
- 2.3** The SPD will be a key document in support of the implementation of a number of the actions identified in the CEAP, including:
- Action 8 under the theme of Buildings & Energy: "...encourage developers to commit to

renewable energy by stipulating requirements in a new Supplementary Planning Document (SPD)” (p.18).

- Action 8 under the theme of Water & Waste: “Leverage the new climate-focussed Supplementary Planning Document to encourage the provision of better waste and recycling facilities in developments.” (p.22).

- 2.4** Addressing climate change through planning is a relatively recent phenomenon that is evolving and developing at a rapid pace. In order to ensure that we can get the most out of the SPD both Members and planning officers will require adequate training.
- 2.5** The Head of Planning is already reviewing the development management service. This will include updating the pre-application process, as well as looking at the validation of planning applications. Improvements to these processes will ensure that applicants are fully aware of the Climate Change SPD and what it requires of them, including the stipulation that they must submit a completed Climate Change Checklist.
- 2.6** The adoption of the SPD will provide a strong, proactive and positive message to developers that the Council expects the highest standards. It has had to go beyond national guidance, as this has not moved as quickly as needed. The SPD can therefore act as a key part of the Council’s lobbying of the Department for Levelling Up, Housing and Communities.

### **3. Alternative options considered**

- 3.1 Delay implementation** - the option of not producing an SPD and waiting for national planning policy to catch up with CBC’s ambition was considered. However, it was determined that any short term gain in officer time would not outweigh the benefits of producing the SPD, both in terms of improving outcomes in the planning process and demonstrating the council’s commitment to net zero. Delay is also not palatable to the public or consistent with the climate emergency declaration and the scale of system change required within the next ten years to make meaningful progress on carbon reduction and support for biodiversity.

### **4. How this initiative contributes to the corporate plan**

- 4.1** The SPD will support CBC in demonstrating strategic co-ordination across its networks to help drive the delivery of the Place Vision at the pace which is clearly warranted.
- 4.2** Setting out the Council’s ambitions and expectations for developments in the borough will lead developers, including homeowners, to design buildings that use low carbon construction techniques. It will also optimise support for nature recovery and increased biodiversity and help to mitigate potential flood impacts. This will improve green spaces and enhance the look and feel of the town, encouraging further investment in the area, aligning with Key Priority 2. The SPD’s guidance on improving access to developments for active transport options, such as bikes and e-scooters, will impact the demand for improvements to infrastructure used by cyclists and pedestrians, which is consistent with air quality and health improvement objectives.
- 4.3** By virtue of the topics covered in the SPD, developers will be directed to improve on-site recycling facilities and support more efficient and environmentally friendly waste management practices. This will help to achieve a greener environment for residents and businesses in Cheltenham, directly contributing to Key Priority 3.

### **5. Consultation and feedback**

- 5.1** The development of the SPD has been informed by informal consultation with several specialist officers, including those from Climate Emergency, Planning, Townscape, Environmental Services and Public Protection teams. Input from appropriate Cabinet Members was garnered early on in the project alongside testing the principles of the SPD with wider specialists across Gloucestershire authorities
- 5.2** Informal consultation has taken place with external partners such as the Gloucestershire Local Nature Partnership (GLNP) and their input sought as local experts in the field of nature and biodiversity.
- 5.3** The formal 4 week public consultation is mentioned above and a report of the responses and how they have been addressed is available in Appendix 3.

## **6. Performance management – monitoring and review**

- 6.1** It is noted that the intention is for the SPD to be an interim document to drive a proactive agenda for sustainable design and construction and help pave the way for future policy changes as our development plans are reviewed. As policy and legislation from both central Government and the Gloucester, Cheltenham and Tewkesbury Joint Strategic Plan, currently in preparation, the SPD will be reviewed and updated as applicable to reflect such changes.

|                               |   |
|-------------------------------|---|
| <b>Report author</b>          | <b>Contact officer: John Rowley, Planning Policy Team Leader</b><br><b>john.rowley@cheltenham.gov.uk, 01242 264180</b>  |
| <b>Appendices</b>             | <ol style="list-style-type: none"><li>1. Risk Assessment</li><li>2. Climate Change Supplementary Planning Document</li><li>3. Consultation Statement</li><li>4. Climate Emergency Action Plan</li></ol> |
| <b>Background information</b> | N/A   |

| The risk  |  |             |             | Original risk score<br>(impact x likelihood) |                |       | Managing risk |   |          |                     |                              |
|-----------|--|-------------|-------------|--|----------------|-------|---------------|---|----------|---------------------|------------------------------|
| Risk ref. | Risk description   | Risk Owner  | Date raised | Impact 1-5                                   | Likelihood 1-6 | Score | Control       | Action  | Deadline | Responsible officer | Transferred to risk register |
| 1.4       | If global heating continues unchecked, there will be significant financial implications, including the revenue and capital costs associated with delivering more frequent emergency responses, repairs and mitigation actions to respond to the consequences of failing to address carbon emissions. | Mike Redman | 01/02/22    | 5  | 5              | 25    | Reduce        | Progress identified leadership and mitigation actions within the climate pathway to move the council and the borough towards a net zero carbon emission future by 2030. |          |                     |                              |
| 1.5       | If we fail to address our local contribution to global heating, there will be an on-going negative impact on weather patterns which will affect the whole environment, including food and water supply, building and cultural assets, landscape, trees and biodiversity.                             | Mike Redman | 01/02/22    | 4  | 2              | 8     | Reduce        | Progress identified leadership and mitigation actions within the climate pathway to move the council and the borough towards a net zero carbon emission future by 2030. |          |                     |                              |
| 1.6       | If we fail to address our local contribution to global heating, there will be an on-going negative contributory impact affecting human health and wellbeing, as temperatures and other climate-related impacts continue to rise at an unsustainable level. This has the potential to                 | Mike Redman | 01/02/22    | 5  | 6              | 30    | Reduce        | Progress identified leadership and mitigation actions within the climate pathway to move the council and the borough towards a net zero carbon emission future by 2030. |          |                     | Mike Redman                  |



|     |  |             |          |   |   |    |        |   |  |  |  |
|-----|--|-------------|----------|---|---|----|--------|---|--|--|--|
|     | seriously disrupt the availability of health and social care services.   |             |          |   |   |    |        |   |  |  |  |
| 1.7 | If we fail to address our local contribution to global heating, there will be a disproportionate impact on those vulnerable groups least able to adapt to the impacts of climate change. | Mike Redman | 01/02/22 | 3 | 4 | 12 | Reduce | Progress identified leadership and mitigation actions within the climate pathway to move the council and the borough towards a net zero carbon emission future by 2030. |  |  |  |

#### Explanatory notes

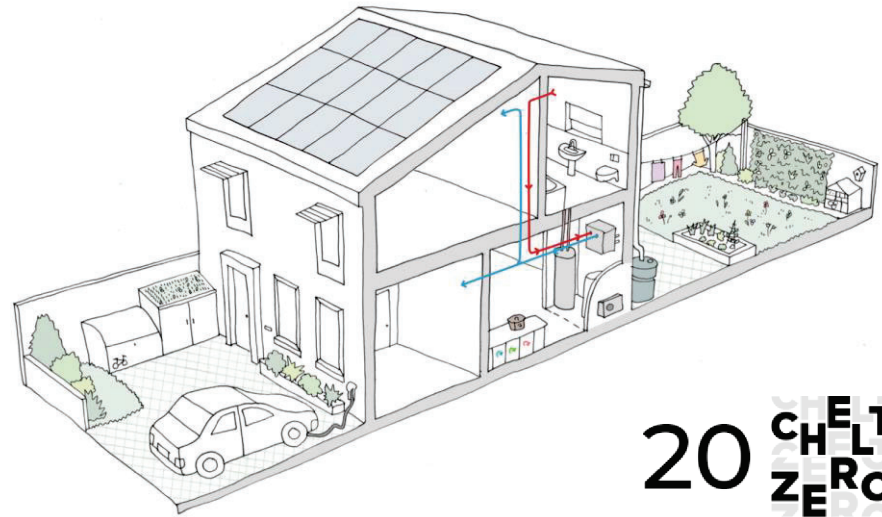
**Impact** – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)

**Likelihood** – how likely is it that the risk will occur on a scale of 1-6

(1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)

**Control** - Either: Reduce / Accept / Transfer to 3rd party / Close

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## Cheltenham Climate Change SPD

Preface

Preface to be provided by CBC.

TBC

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With thanks to April Grisdale Illustrations for the illustrations created for the One-Page Summaries and Levitt Bernstein Architects for the use of some of their images in the Guidance section

# This Climate Change SPD

This Climate Change Supplementary Planning Document (SPD) has been created to communicate Cheltenham Borough Council’s ambitions for all buildings within the borough and how they should respond to the climate change and biodiversity crisis.

The SPD is intentionally ambitious. It builds on currently adopted policies with necessity and purpose. Necessity, because it is our responsibility to respond to the climate emergency as we plan for our existing communities and the future generations. Purpose, because we want to communicate the direction of our future policy and use the planning system positively as an enabler for change. The planning process urgently needs to be consistent with a zero carbon future, help limit global temperature rises, mitigate the impacts of climate change and reverse biodiversity loss.

### Who is this SPD for?

This SPD is for homeowners, architects, developers or engineers with building projects that require planning permission from Cheltenham Borough Council. This SPD also provides useful guidance for anyone wishing to build to net zero carbon standards, or refurbish or extend their property.

### What types of development does this SPD cover?

This SPD covers all types of development: residential and non-residential, new-build and refurbishment and extensions.

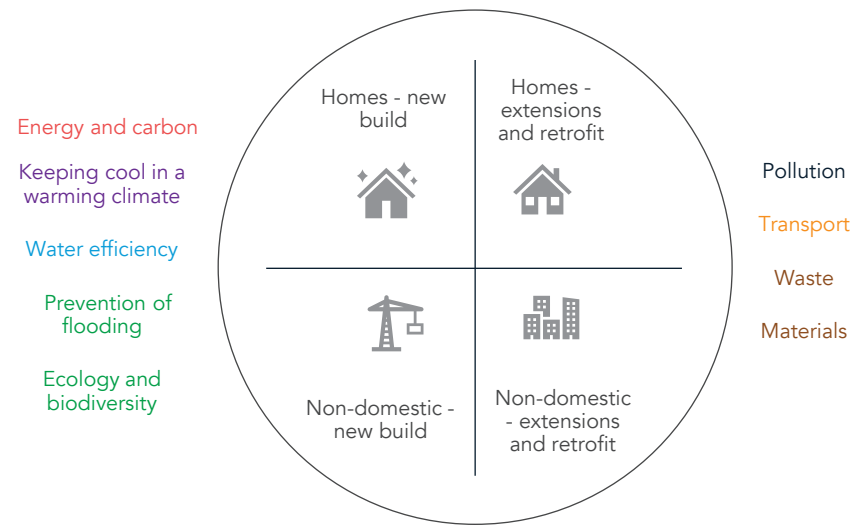
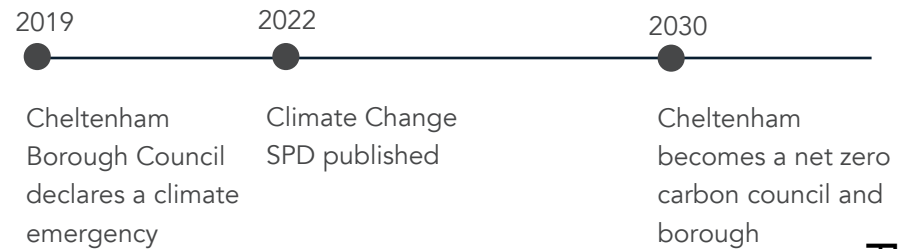
The SPD also covers all scales of development. Development specific guidance is given on topic pages where appropriate.

### Planning applications should align with this SPD

The SPD provides guidance on how applicants can successfully integrate a best-practice approach towards climate and biodiversity in their development proposals. How successfully applicants align with the SPD will be a material consideration in the determination of planning applications by the local planning authority.



All buildings should strive to achieve ambitious carbon reductions today.



This SPD covers all development types, at all scales: new-built and retrofit, homes and non-domestic buildings. A broad range of climate change and sustainability issues are addressed.

# Climate responsible development: where do we need to be?

## The Climate Change Committee’s recommendations

The Climate Change Committee is an independent body appointed to advise the government on how to achieve its climate change target of being net zero carbon by 2050 (legislated by the Climate Change Act). Their 2019 report “Net Zero: The UK’s contribution to stopping global warming” provides an in-depth analysis of the actions required across different sectors: buildings; industry; power; transport; aviation & shipping; agriculture & land-use; waste; fluorinated gases and greenhouse gas removals. These are summarised on the right.

Emissions from industrial and commercial sources, freight, air travel and land-use and agriculture emissions are shown to be difficult to abate. This makes it imperative that housing, light transport and waste sectors achieve maximum possible reductions.

## We all need to work together

All UK local authorities and their inhabitants need to play their part in realising these collective ambitions. Cheltenham Borough Council is committed to working with and supporting others to achieve these aims.

## It is important to know where we are going

The guidance in this SPD has been formulated with the objective of delivering sustainable development in a way that is consistent with climate change and biodiversity objectives.

The three overarching objectives needed to respond to climate change in Cheltenham



## Key conclusions from the Climate Change Committee’s “Balanced Pathway” on where we need to be

- Fully decarbonise electricity by 2035 while meeting a 50% increase in demand
- All new homes are zero carbon by 2025 at the latest
- Ultra-efficient new homes and non-domestic buildings
- Low carbon heat to all but the most difficult to treat buildings.
- Ambitious programme of retrofit of existing buildings.
- Complete electrification of small vehicles (100% of new sales by 2030).
- Large reduction in waste, zero biodegradable waste to landfill by 2025, zero all waste to landfill by 2040.
- Significant afforestation and restoration of land, including peatland.
- Greenhouse gas removals will be required to achieve net zero carbon.

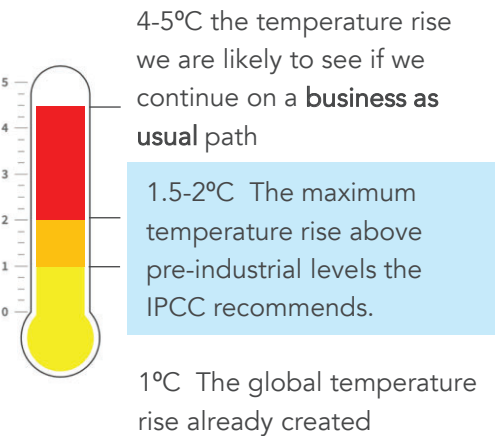
# Climate responsible development: how quickly do we need to be there?

## Carbon budgets

Climate science shows us that the amount of carbon in the atmosphere is proportional to the global temperature rises that are accelerating climate change and the increasing weather extremes it brings.

The UK has committed to limit global temperature rises to 1.5-2°C through the Paris Agreement and being net zero carbon by 2050. Cheltenham has committed to being net zero carbon by 2030. More than target dates, what is important is the amount of carbon we emit between now and then and not emitting more than our fair share of the global carbon budget. According to the [Tyndall Centre](#), Cheltenham is on track to have consumed its carbon budget by 2027 based on current emissions rates. Therefore we need to reduce carbon emissions sharply (at a rate of approximately 13% per year) if we are to be consistent with Paris Agreement objectives.

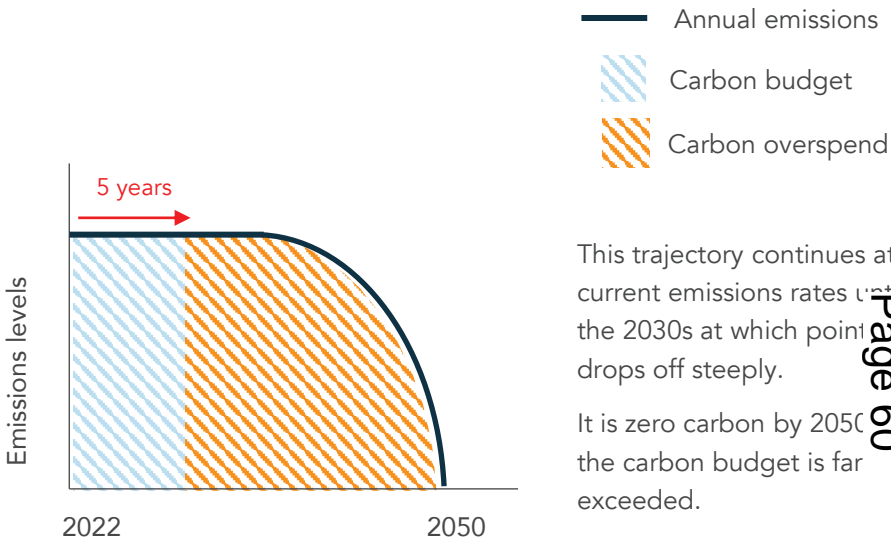
In order to help realise the steep emissions reductions we need to see, new development in Cheltenham can and should be built to net zero carbon standards now, and existing buildings should urgently be targeting low and zero carbon retrofit standards.



2027

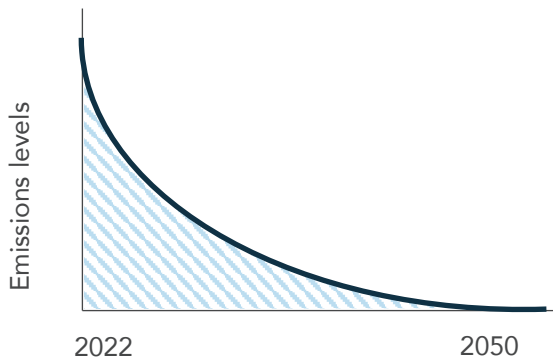
The year we will would exceed Cheltenham's 1.5-2°C carbon budget at 2017 emissions rates

Cheltenham's carbon budget = 2.0 MtCO<sub>2</sub> (from 2022)\*  
Current emissions rate = 0.39 MtCO<sub>2</sub>/yr (2019)  
Years left of budget at current emissions rate: **5 years**



Trajectory type A

This trajectory continues at current emissions rates until the 2030s at which point it drops off steeply. It is zero carbon by 2050 but the carbon budget is far exceeded.



Trajectory type B

This trajectory sees cumulative emissions stay within carbon budget, but a 13% reduction in emissions year on year is required to achieve it.



# Aligning development proposals with this SPD

## Planning applications should align with this SPD

The SPD provides guidance on how applicants can successfully integrate a best-practice approach towards climate and biodiversity in their development proposals. How successfully applicants align with the SPD will be a material consideration in the determination of planning applications by the local planning authority.

## Supporting existing policy

This SPD defines what the Council consider to be a proportionate response to Cheltenham’s Joint Core Strategy, Strategic Objective 6 – Meeting the challenges of climate change. The SPD supports implementation of the National Planning Policy Framework (NPPF) 2021 with a local context for Cheltenham. It addresses head on the planning authority’s remit to: “help shape places in ways that contribute to radical reductions in greenhouse gas emissions” (para.152), taking a “proactive approach to mitigating and adapting to climate change” (para.153).

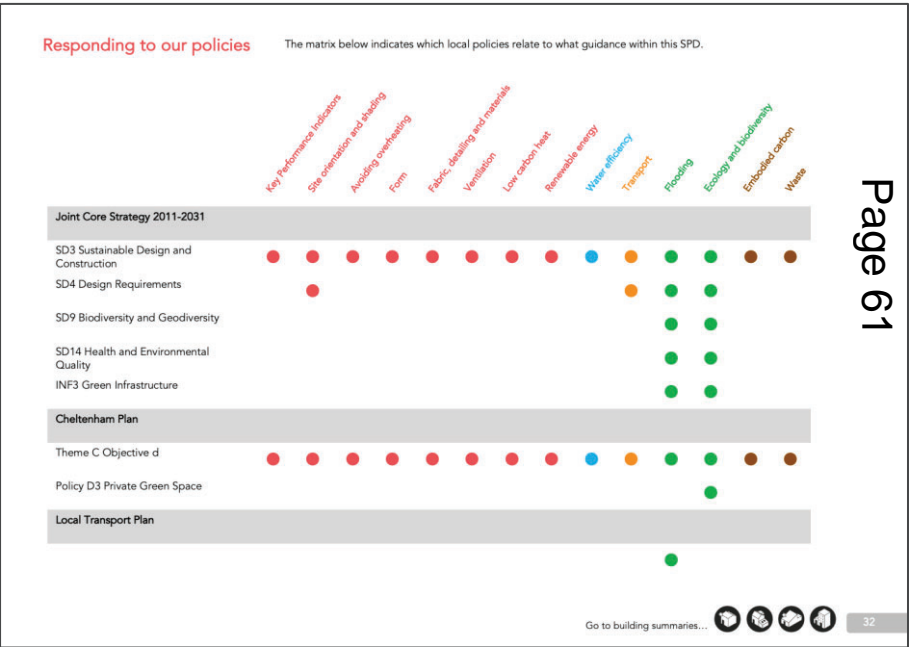
Applicants seeking guidance on how to comply with policies within the Joint Core Strategy 2011-2031, the Cheltenham Plan and the Local Transport Plan can use the policy matrix (p. 32) to locate relevant guidance pages within this SPD.

## Key reference documents

Sources of useful further information are provided at the back of this SPD. They are included for reference only and applications do not need to comply with their requirements.

## Checklist

A Climate Change Checklist (p. 33) provides the applicant with an easy to digest summary. Applicants will be expected to demonstrate, within their development proposals, how they have integrated in the early stages of design, an acceptable and proportionate response that aligns with the SPD. The Council will consider all planning applications using the SPD as a material consideration in their determination.

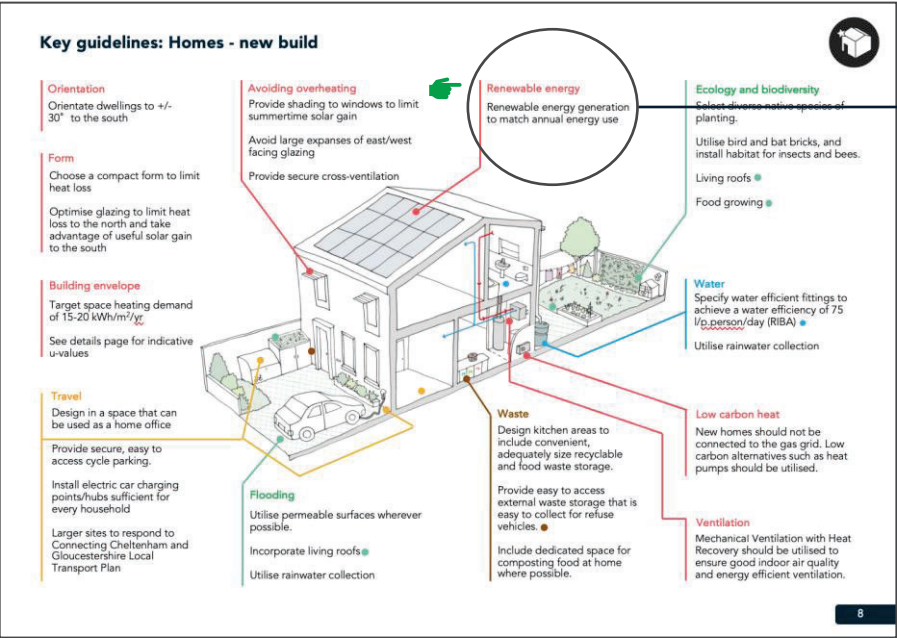


Page 32 of this SPD offers a matrix linking the guidance herein to the policies within the Joint Core Strategy 2011-2031, the Cheltenham Plan and the Local Transport Plan.

# How to use this document

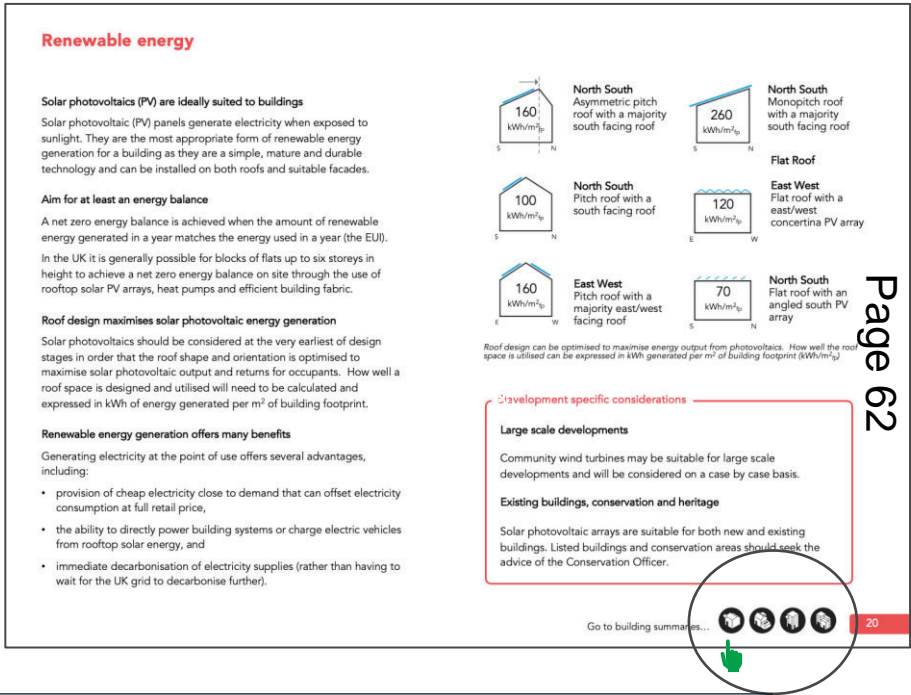
## One-page overviews

We are looking for applications to address climate change in an holistic manner. Four one-page overviews, one for each of the four building categories, illustrate key measures for addressing climate.



## Detailed guidance pages

Acceptable responses to our climate change policies are given in the Guidance section, pages 13 to 27.



- New homes
- Extensions and retrofit of existing homes
- New non-domestic buildings
- Extensions and retrofit of non-domestic buildings

## Interactive navigation

Navigate between strategy overviews and detailed guidance pages by clicking linked coloured headings and building icons.



# One-page summaries

New homes

Home extensions and refurbishment

New non-domestic buildings

Non-domestic extensions and refurbishment

# Key Performance Indicators (KPIs) and recipe for Net Zero carbon buildings

New developments should achieve Net Zero carbon in operation through applying the three core principles outlined below, and by demonstrating the Key Performance Indicators (KPIs) defined by LETI (The London Energy Transformation Initiative) and reproduced on the right.

## 1 - Energy efficiency

Buildings should use energy efficiently. Space heating demand expresses the amount of energy and building needs for heating and is impacted by site and orientation, window design, form, building fabric, materials and detailing, and ventilation (see pages 14-18).

Energy Use Intensity (EUI) expresses the total amount of energy a building uses (per m<sup>2</sup> per year), and can be measured in-use through the energy meter. It is impacted by the space heating demand, the choice of heating system (p.19), ventilation system (p.18), lighting, cooking, appliances and equipment.

## 2 - Low carbon heating

All new buildings should be built with a low carbon heating system and must not connect to the gas network.



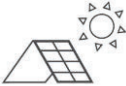
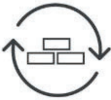
## 3 - Renewable energy generation

In new buildings, annual renewable energy generation should be at least equal to the energy use of the building (the EUI) . If this is not possible on-site, it should be demonstrated that the equivalent of 120 kWh/m<sup>2</sup><sub>(footprint)</sub>/yr of renewable energy is generated across the development.

## Demonstrating compliance

For domestic buildings PassivHaus Planning Package (PHPP) offers an accurate means of estimating energy demands. PassivHaus certification is not required but does help to ensure construction quality.

For non-domestic buildings PassivHaus Planning Package (PHPP) or dynamic thermal modelling in accordance CIBSE TM54.

|  | Housing   | Offices   | Schools   |
|--|---|---|---|
| Space heating demand, kWh/m <sup>2</sup> /yr   | 15-20   | 15-20   | 15-20   |
|  Energy use intensity (EUI), kWh/m <sup>2</sup> /yr | 35  | 55  | 65  |
|  Renewable energy                                   | Balance EUI<br>OR<br>120<br>kWh/m <sup>2</sup> /yr<br>footprint | Balance EUI<br>OR<br>120<br>kWh/m <sup>2</sup> /yr<br>footprint | Balance E<br>OR<br>120<br>kWh/m <sup>2</sup> /yr<br>footprint |
|  Embodied carbon                                    | 350<br>kgCO <sub>2</sub> e/m <sup>2</sup> /yr                   | 300<br>kgCO <sub>2</sub> e/m <sup>2</sup> /yr                   | 300<br>kgCO <sub>2</sub> e/m <sup>2</sup> /yr                 |
|   |   |   |   |

\*Embodied carbon is addressed on page 25.

Above: New developments should seek to achieve the KPIs recommended by LETI, <https://www.leti.london/cedg> .

LETI also has a Climate Emergency Retrofit Guide: <https://www.leti.london/retrofit>

# Key measures: Homes - new build

New homes should be built to zero carbon standards as defined by LETI and should seek to achieve their KPIs detailed on page 8.



## Orientation

Orientate dwellings to +/- 30° to the south if possible.

## Form

Choose a compact form to limit heat loss.  
Optimise glazing to limit heat loss to the north and take advantage of useful winter solar gain to the south.

## Building envelope

Target a space heating demand of less than 15-20 kWh/m<sup>2</sup>/yr.  
See details page for indicative U-values.  
Consider impact of increasing high winds.

## Transport & Travel

Provide secure, easy to access cycle parking.  
Install electric car charging points/hubs sufficient for every household.  
Design in a space that can be used as a home office.  
(Larger sites to respond to Connecting Cheltenham and Gloucestershire Local Transport Plan).

## Avoiding overheating

Provide external shading to windows.  
Avoid large areas of east/west facing glazing.  
Provide secure cross-ventilation.  
Undertake an overheating risk assessment  
Utilise trees for further shading.

## Renewable energy

Renewable energy generation to match annual energy use or generate 120kWh/yr per m<sup>2</sup> of building footprint.

**Smart energy** - Utilise smart meters and smart appliances and car charging to use energy efficiently.

## Ecology and biodiversity

Select diverse native species of planting and include living roofs  
Create habitat for mammals (such as hedgehogs, as well as bats) and amphibians and reptiles (such as toads and newts) birds and insects.

## Water

Specify water efficient fittings to achieve a water efficiency of 105 l/p.person/day (RIBA).  
Utilise rainwater collection

## Low carbon heat

New homes should not be connected to the gas grid.  
Low carbon alternatives such as heat pumps should be utilised.

**Efficient electric cooking appliances.**

## Ventilation

Mechanical Ventilation with Heat Recovery should be utilised to ensure good indoor air quality and energy efficient ventilation.

## Waste

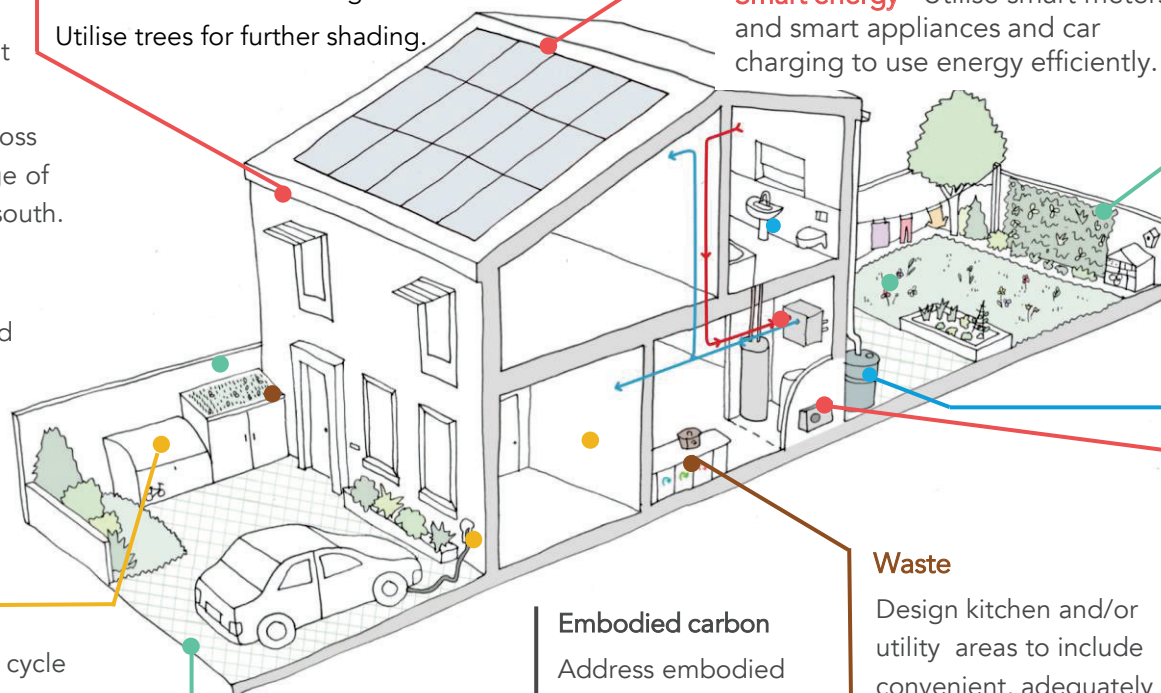
Design kitchen and/or utility areas to include convenient, adequately sized recyclable and food waste storage.  
Provide easy access external waste storage that facilitates efficient collection by refuse vehicles.

## Embodied carbon

Address embodied carbon, focussing on the structure, by considering different options.  
Work with the structural engineer to assist this process.

## Flooding

Utilise permeable surfaces wherever possible.  
Utilise rainwater collection.  
Incorporate living roofs.





# Key measures: Homes - refurbishment and extensions

Refer to new build homes one-page summary for key principles.



All homes will need to decarbonise over the next decade. A decarbonisation plan helps homeowners set their home on a pathway to zero carbon, with clear, staged steps to get there. A Retrofit Designer and Co-ordinator will help to develop a bespoke plan using a 'whole-house' approach using the PAS 2035 standard. Extensions and refurbishment works offer opportunities for improving the environmental performance of a home.

## New roof

Keep roof form simple.  
Consider how photovoltaics could be integrated at the same time as replacing a roof or adding a loft conversion. Since access arrangements will already be in place, installation may be cheaper.

## Replacement windows

High performance new windows should be selected – preferably triple glazing.  
Consider installing Mechanical Ventilation with Heat Recovery at the same time to maintain indoor air quality.

## New driveways

New driveways should always be finished with permeable surfaces.  
Resurface as little as possible.  
Where planting is removed habitat should be replaced elsewhere on-site (e.g. new tree planting and insect habitat).

## Conservation areas and listed buildings

Heritage buildings and energy efficiency can be successfully integrated.  
Early conversations with Conservation Officers are recommended to ensure that the most can be achieved for net zero carbon whilst also ensuring a development meets local conservation design policies.

## Chimneys

Chimneys are a source of heat loss. Chimneys can be removed or blocked up – the chimney space must be ventilated from the outside. Wood burning stoves are a source of local air pollution and should not be installed.

## Loft conversions

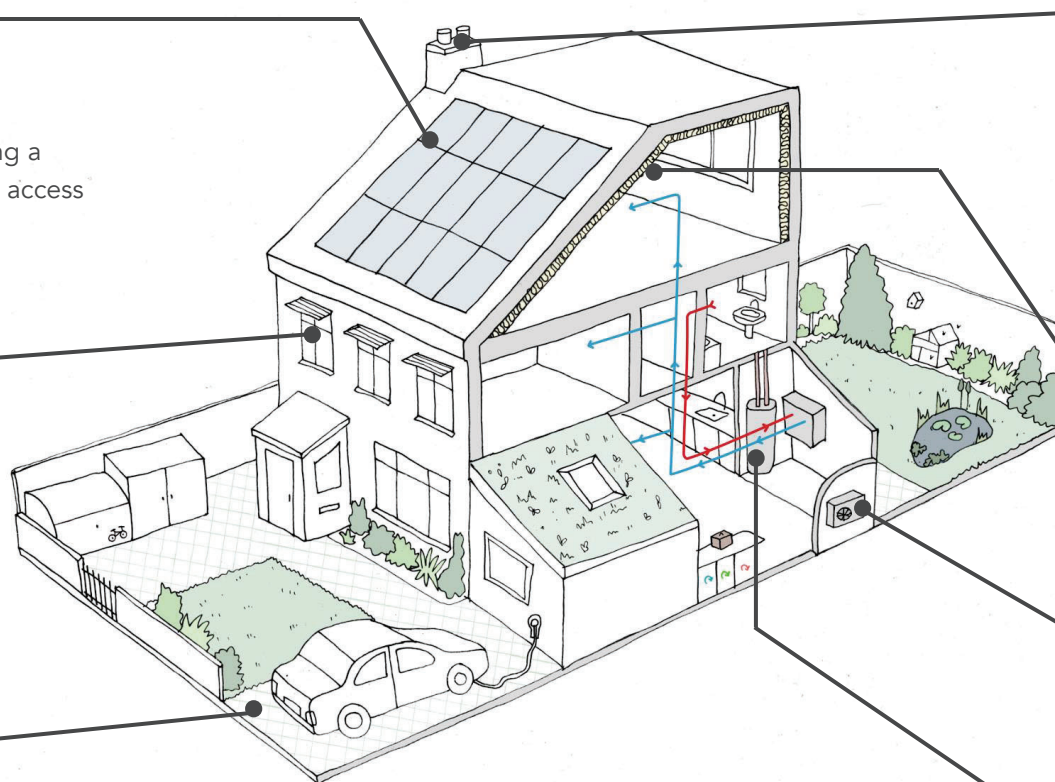
Insulate roofs well.  
Use breathable insulation that has high thermal density and good insulation values.

## Replacement heating system

Do not install new gas boilers.  
Consider a heat pump.

## Replacement kitchen

Insulate the internal wall before installing new kitchen units.  
Install efficient electric cooking appliances  
Plan space for a utility cupboard that can house hot water storage and a whole house ventilation unit.



# Key measures: Non-domestic – new build



New buildings should be built to the zero carbon standard defined by LETI and should seek to achieve the KPIs on page 8.

## Orientation

Orientate dwellings to +/- 30° to the south if possible

## Form

Choose a compact form to limit heat loss.

Optimise glazing to limit heat loss to the north and take advantage of useful winter solar gain to the south.

## Building envelope

Target a space heating demand of less than 5-20 kWh/m<sup>2</sup>/yr.

Consider impact of increasing high winds.

## Travel

Provide secure, easy to access cycle parking.

Provide facilities for cyclists, including lockers and showers.

Install electric car charging points/hubs.

Priority parking for car sharers

*(Larger sites to respond to Connecting Cheltenham and Gloucestershire Local Transport Plan)*

## Avoiding overheating

Provide shading to windows to limit summertime solar gain

Avoid large expanses of east/west facing glazing

Provide secure cross-ventilation

Undertake an overheating risk assessment

## Renewable energy

Renewable energy generation to match annual energy use or generate 120kWh/yr per m<sup>2</sup> of building footprint

Roof design should be optimised for renewable energy generation.

## Ecology and biodiversity

Select diverse native species of planting and include living roofs  
Create habitat for mammals (such as hedgehogs, as well as bats) and amphibians and reptiles (such as toads and newts) birds and insects.

## Water

Specify water efficient fittings.  
Utilise rainwater collection

## Low carbon heat

New buildings should not be connected to the gas grid. Low carbon alternatives such as heat pumps should be utilised.

Heat pumps can also be used to provide cooling when required.  
Efficient electric cooking appliances.

## Ventilation

Mechanical Ventilation with Heat Recovery should be utilised to ensure good indoor air quality and energy efficient ventilation.

## Embodied carbon

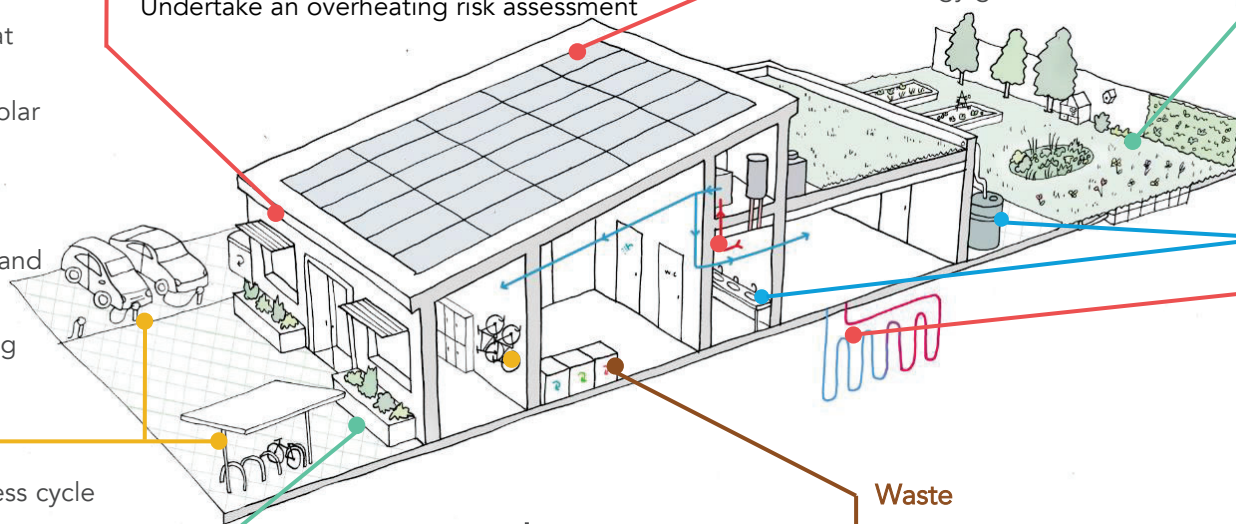
Address embodied carbon, focussing on the structure, by considering different options.  
Work with the structural engineer to assist this process.

## Waste

Design convenient, adequately sized and adaptable storage for recyclable waste, food waste, general waste and other relevant waste streams.  
Provide easy access for efficient collection by refuse vehicles.

## Flooding

Utilise permeable surfaces wherever possible.  
Incorporate living roofs and biosolar roofs.  
Utilise rainwater collection.



# Key measures: Non-domestic - refurbishment and extensions



All existing buildings will need to decarbonise over the next decade. A decarbonisation plan helps building owners set their building on a pathway to zero carbon, with clear staged steps to get there. A Retrofit Co-ordinator will help to develop a bespoke plan using a 'whole-building' approach.

## Photovoltaic panels

Installation of photovoltaic panels should be considered in all cases. Arrays can be installed over existing plant, integrated into existing roofs, alongside green roof and on extensions. They can work efficiently at east and west facing elevations as well as south facing.

## Replacement windows

High performance new windows should be selected – preferably triple glazing.

## Permeable surfaces

Where new hardstanding is created this should be permeable. Resurface as little as possible.

Where planting is removed habitat should be replaced elsewhere on-site (e.g. new tree planting and insect habitat).

## Waste

Upgrade waste storage facilities in line with best practice

## Conservation areas and listed buildings

Heritage buildings and energy efficiency can be successfully integrated.

Early conversations with Conservation Officers are recommended to ensure that the most can be achieved for net zero carbon whilst also ensuring a development meets local conservation design policies.

## Thermal insulation

Thermal insulation should be selected according to the original building construction and materials. Breathable insulation materials will reduce the risk of moisture build up in walls.

## Soakaways

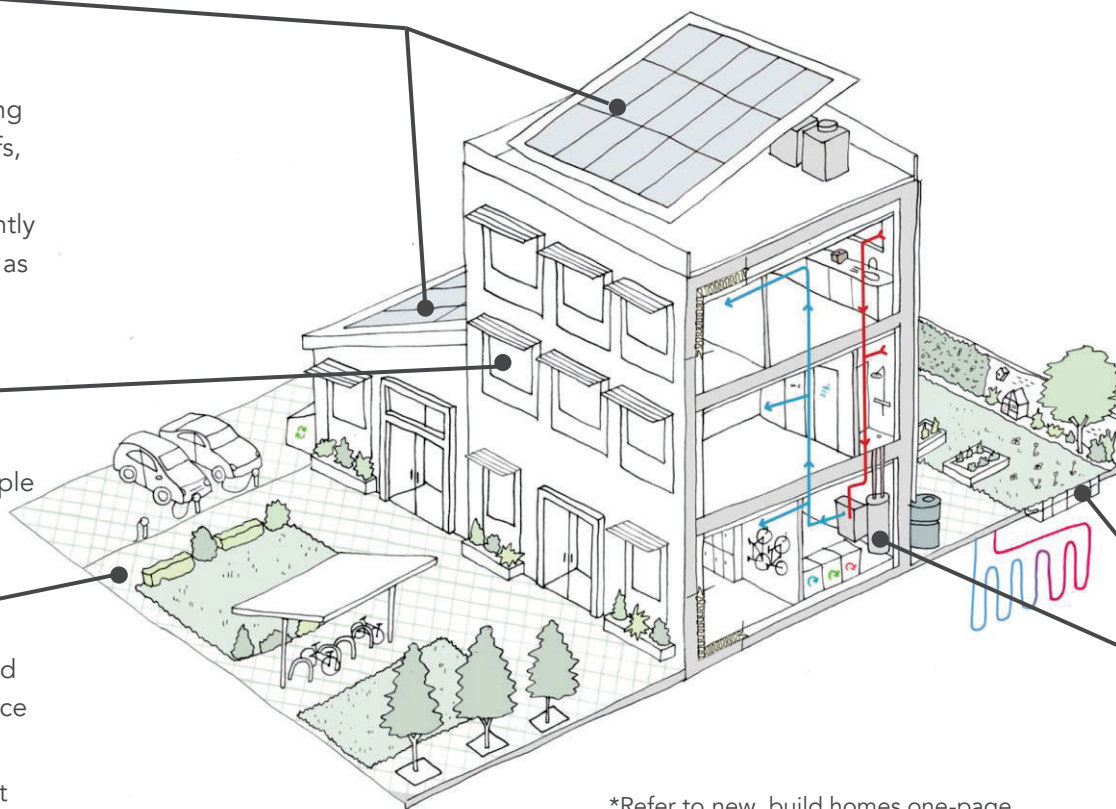
Groundworks should seek solutions to retain water on-site and discharge to the ground where possible, e.g. through rain gardens or soakaways.

## Replacement heating system

Do not install new gas boilers. Consider a heat pump.

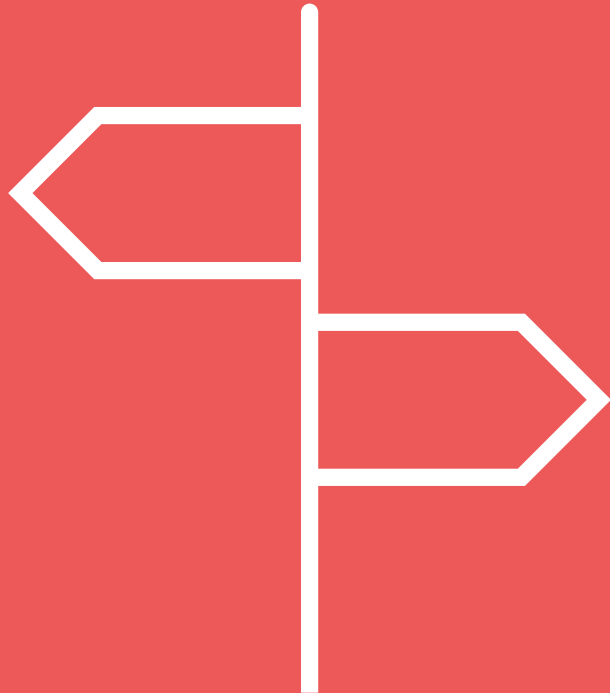
## Embodied carbon

Address embodied carbon in extensions and work to the structure by considering different options and working with a structural engineer.



\*Refer to new build homes one-page summary for key principles.





# Guidance

This section gives more detail on the different themes presented in the one-page summaries for each building type in the previous section.

# Site and orientation

## Choosing a site

Preference should be given to re-use of existing buildings before construction of new buildings. Where new buildings will be constructed, preference should be given to brownfield sites over greenfield sites.

## Which direction should the building face?

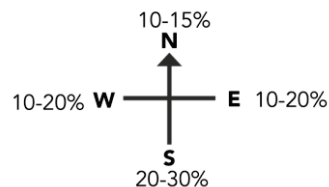
The orientation and massing of the building should be optimised, if possible, to allow useful solar gains and prevent significant overshadowing in winter. Encourage south facing buildings ( $\pm 30^\circ$ ) with solar shading and prioritise dual aspect. Overshadowing of buildings should be avoided as it reduces the heat gain from the sun in winter.

## Overshadowing

Prioritise the south in orientating masterplans, angling the roofs to make the most of PV opportunities to the south. Allow a distance of 1 to 1.5 times the buildings height between buildings to avoid overshadowing and impacting the internal solar gains.

## How big should the windows be?

Getting the right glazing-to-wall ratio on each façade is a key feature of energy efficient design. Minimise heat loss to the north (smaller windows) while providing sufficient solar heat gain from the south (larger windows).

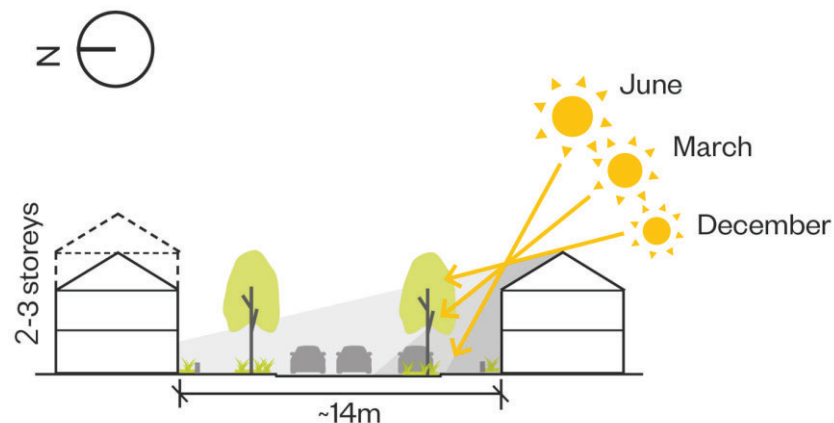


### Window Ratio

The ratio of windows to external elevation should be in percentage range shown.

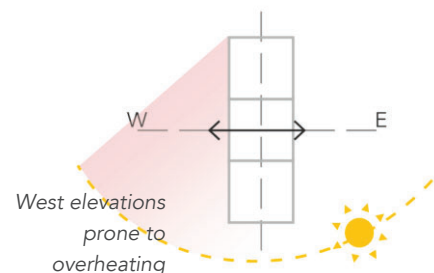
## Solar Shading

Prioritise occupied spaces with larger windows on the south. It is easier to design fixed shading on south facades to manage overheating risk while allowing heat gains in winter.

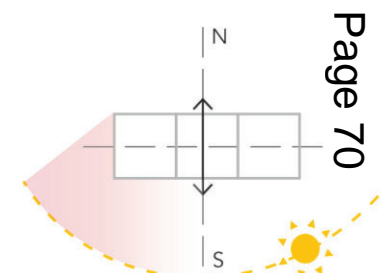


Allow a distance of 1-1.5 times the building's height between buildings.

Images: Levitt Bernstein Architects.



**Inefficient Design** - Avoid east west facing as this can mean the building is prone to overheating



**Optimised Design** - Ideally south facing allows for solar winter gain

## Extensions and refurbishments

These principles are also applicable to new extensions to existing homes or other existing buildings.

For retrofit and refurbishments, consider the principles of window shading (p.23) and window proportions (p.19).



# Avoiding overheating

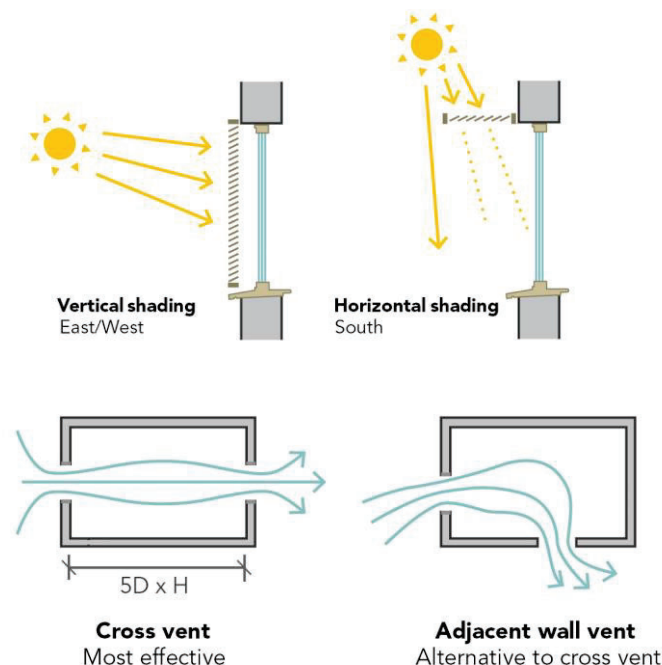
Climate change is already bringing warmer summers with more extreme temperature highs. With this, overheating in buildings is becoming an increasing threat to occupants' health and wellbeing, particularly for vulnerable people. In future years, this is set to become even more of an issue.

All developments are therefore required to demonstrate how the risk of overheating has been sufficiently mitigated through good design.

## Design out overheating from the start

Overheating is a known risk and must be reduced through good design. All developments should:

1. Ensure glazing areas are not excessive i.e. not more than 20-25% of facade on south or west façades.
2. Provide appropriate external solar shading. South façades should have horizontal shading over the window and the west façade should ideally have efficient movable shading e.g. shutters. Do not rely on internal blinds – these can be ineffective.
3. Ensure good levels of secure natural ventilation are possible. Design window openings to take advantage of cross-ventilation (from one side to another) and/or stack ventilation (from bottom to top). Avoid fixed panes and maximise opening areas of windows. Side hung windows typically allow more ventilation than top hung.
4. Select a g-value (the solar factor indicating how much heat is transmitted from the sun) for glass of around 0.5 where possible. Avoid reducing it too much as this would also reduce free winter solar gains.
5. Utilise thermal mass in buildings to help dampen temperature swings throughout the day, and work with secure natural ventilation to provide passive night-time cooling
6. Utilise green and blue infrastructure to provide natural cooling to the local environment and reduce the urban heat island effect.



## What you should do

- Use the Good Homes Alliance overheating tool and checklist to demonstrate that the design is at low risk of overheating.
- Demonstrate compliance with the new Part O of the building regulations, Chartered Institute of Building Services Engineers (CIBSE) Technical Memorandum 59 (TM59) for domestic buildings or TM52 for non-domestic buildings.
- Use the Acoustics and Noise Consultants (ANC) Acoustics, Ventilation and Overheating Guide to find a balanced approach to acoustics, daylight and overheating risk.
- Provide a statement describing all ways in which overheating has been addressed on the development or building.

# Design and efficient building form

All developments should achieve space heating demands of 15-20 kWh/m<sub>2</sub>/yr and achieve a net zero energy balance on-site. Optimising building form can make it easier and cheaper to achieve these targets.

## Simple forms are more energy efficient

A simple and compact building is more energy efficiency. Exposed surface area is reduced, in turn reducing the amount of heat that is lost through the walls and roof. A simple shape also reduces the number of junctions and corners in the walls and roof, where it can be difficult to make sure that insulation is continuous, and where extra heat can be lost (thermal bridges). Good design can marry simple form and architectural interest.

## Harnessing energy from the sun for heating

Utilise principles of passive solar design to reduce winter heating load, limit summertime overheating and aid natural ventilation.

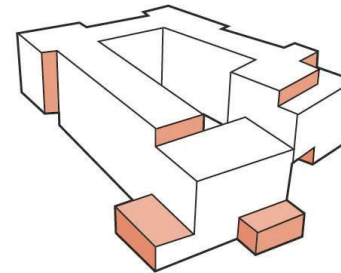
## Maximising renewable energy generation

Consider how the building form supports the capture of renewable energy, passive solar gains from the sun, and efficient natural ventilation.

### What you should do

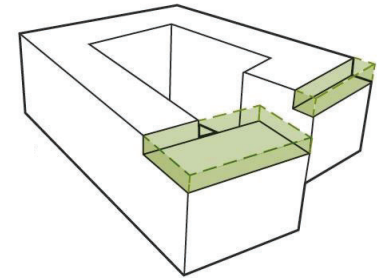
- Keep the form simple and compact.
- Avoid or limit the use of stepped roofs, roof terraces, overhangs and inset balconies as these features will decrease the building's energy efficiency.
- Avoid vertical interruptions to the structure – this will reduce thermal bridging and heat loss.
- Optimise roof design to capture maximum renewable energy.
- Optimise window to wall ratio to balance useful solar gains with heat loss (see page 14).

## Less Efficient Form and elevation

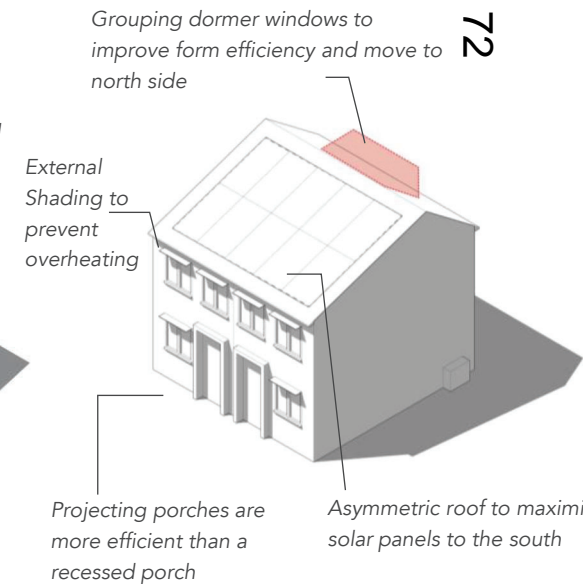
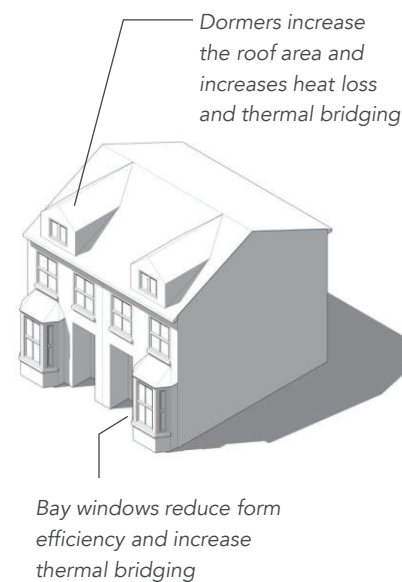


Larger exposed surface area created by step backs and protrusions

## Optimised Form



Same building but with a simpler form.



# Building fabric and detailing

## Reducing heat loss

All developments should achieve the target space heating demand of 15-20 kWh/m<sup>2</sup>/yr, in order to minimise energy required for heating or cooling buildings (p.13).

This will require excellent levels of insulation and airtightness, and minimal thermal bridging. The building fabric specifications listed on the right can be used as a guide. Appropriate specification of material and careful detailing will also be required.

**Insulation standards, or U-values (W/m<sup>2</sup>.K),** are a measure of how well heat passes through an element. The lower the u-value the better the insulator.

**Thermal bridging** is where a building component allows significantly more heat to travel through it than the materials surrounding it. This can create “cold” spots and sources of heat loss and mould.

**Airtightness (m<sup>3</sup>/h/m<sup>2</sup>)** is a measure of the leakiness of a building and how much air passes between different building elements and junctions. This uncontrolled ventilation leads to heat loss.

## Thermal mass

Thermal mass also plays a big part in thermal comfort. Thermal mass (such as brick or blockwork) inside the building helps to stabilise internal temperatures throughout the day. Lightweight buildings with little thermal mass will be subject to larger temperature swings.

## Sustainable Sourcing

Choose materials that have certification from the Forest Stewardship Council (FSC), the Programme for Endorsement of Forest Certification (PEFC), ISO 14001 (Environmental Standard), BES 6001 Framework for Responsible Sourcing, CARES steel certification.

Indicative u-values to achieve a space heating demand of 15-20 kWh/m<sup>2</sup>/yr for new housing and 50 kWh/m<sup>2</sup>/yr for retrofit

|                  | New housing                           | Retrofit                              | Non-domestic   |
|------------------|---------------------------------------|---------------------------------------|--|
| Roof             | 0.100 W/m <sup>2</sup> .K             | 0.12 W/m <sup>2</sup> .K              | There are too many variables in non-domestic buildings to give indicative u-values |
| Walls            | 0.10-0.15 W/m <sup>2</sup> .K         | 0.18 W/m <sup>2</sup> .K              |  |
| Ground floor     | 0.100 W/m <sup>2</sup> .K             | 0.15 W/m <sup>2</sup> .K              |  |
| Airtightness     | <1.0 m <sup>3</sup> /h/m <sup>2</sup> | <3.0 m <sup>3</sup> /h/m <sup>2</sup> |  |
| Thermal bridging | 2 kWh/m <sup>2</sup> /yr              | 0.1 W/m.K                             |  |
| Windows          | 0.8 W/m <sup>2</sup> .K               | 1.0 W/m <sup>2</sup> .K               |  |
| Doors            | 1.0 W/m <sup>2</sup> .K               | 1.0 W/m <sup>2</sup> .K               |  |

Notes: U-values are **indicative** of specifications required for a semi-detached house to meet LETI space heating demand targets. Better u-values would be required for detached houses and bungalows. Poorer u-values would be acceptable for flats and terraced houses.

### Refurbishments

Existing buildings can be retrofitted to improve thermal performance. Care should be taken to select the right materials to ensure moisture can pass freely through the building element and not get trapped. More information on this can be found in the Forest of Dean, Cotswold and West Oxfordshire District Councils’ [Net Zero Carbon Toolkit](#).

By selecting insulation with some thermal mass (e.g. wood fibre board) temperature variations throughout the day can be moderated.

# Ventilation & airtightness

All developments should achieve a space heating demand of 15-20 kWh/m<sup>2</sup>/yr. To achieve this level it will be necessary to achieve excellent levels of air-tightness and employ Mechanical Ventilation with Heat Recovery (MVHR).

## Controlled air flow through good airtightness

The key to energy efficient ventilation in all buildings is being in control of where, when and how air flows through a building. This starts with very good airtightness to limit any uncontrolled infiltration. Trickle vents should be avoided as they do not control infiltration. Practical guidance on how to achieve good levels of airtightness can be found in the Forest of Dean, Cotswold and West Oxfordshire District Councils' [Net Zero Carbon Toolkit](#).

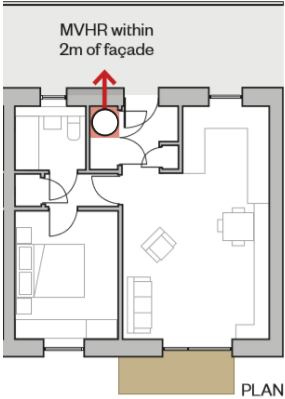
## Controlled ventilation with heat recovery

A key component to energy efficient, airtight homes is Mechanical Ventilation with Heat Recovery (MHVR). MVHR is suitable for all building types. Long used in non-domestic buildings, it is increasingly used in homes to ensure good indoor air quality and to remove and replace stale air in an energy efficient manner.

MVHR units supply air into occupied spaces, and extract air from circulation spaces, or kitchen and bathroom spaces in the case of homes, it does this using very little energy and recovers heat energy from outgoing air.

Units should be positioned close to an external wall to prevent heat loss from the ductwork that connects to the outside. These ducts should be accurately fitted with adequate insulation to prevent heat loss, and generally ductwork should avoid having sharp bends which could affect pressure loss and flow.

MVHR units include filters that must be changed regularly (usually at least once per year but check the manufacturer's instructions).



### Key requirements for a good MVHR system

|                                 |                                     |
|---------------------------------|-------------------------------------|
| Distance from external wall     | <2m                                 |
| Specific fan power              | <0.85 W/l/s                         |
| Heat recovery                   | >90%                                |
| Thickness of duct insulation mm | >25mm                               |
| Certification                   | Passivhaus Certified                |
| Maintenance                     | Easy access for filter replacement. |

MVHR systems are an effective way of providing ventilation to airtight homes.  
The unit should be located within 2m of the façade (Source: Levitt Bernstein + Etude)

### Development specific considerations

#### Existing buildings

Where airtightness is improved through replacement of windows or doors, mechanical ventilation with heat recovery should be installed to reduce the risk of condensation building up which can lead to damp, mould and poor indoor air quality.

#### Non-domestic buildings

Natural ventilation should be considered for times when ventilation is required without heating or cooling demands. However, if a building is heated or cooled all through the year, the building should rely on mechanical ventilation in order that opening windows do not conflict with heating or cooling modes.



## Low carbon heat

All new buildings should utilise low carbon heat for heating and hot water. No new developments should be connected to the gas grid.

All existing buildings should replace fossil fuel based systems with low carbon heat alternatives as a matter of priority.

Net Zero carbon buildings do not burn fossil fuels for energy. Currently available low carbon alternatives include Air Source Heat Pumps and Direct Electric heating. The electricity needed to power these systems should be met through on-site renewables as far as possible, and the remainder through grid electricity, which is decarbonising quickly.

### Heat pumps are the most energy efficient means of heating

Heat pumps can provide both space heating and domestic hot water and can serve individual homes and buildings or communal heating systems. Over the course of their lifetime they will emit just 20% of the carbon a gas boiler would. They are a solution for all building types at all scales.

### Direct electric heating

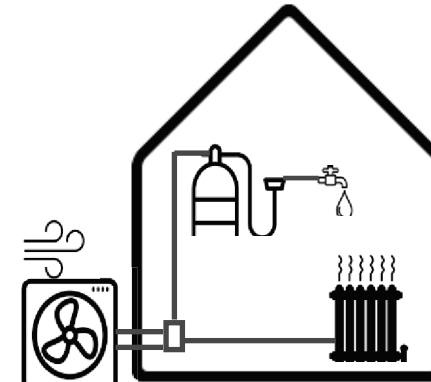
Direct electric heating systems will also emit less carbon than a gas boiler, however it will use around 3x more energy (and carbon) than a heat pump and will cost more to run.

### District and communal heating

Communal heating is a viable option where ambient distribution temperatures are used, which is both more energy efficient and reduces risk of overheating.

Where heat networks are proposed, applications will need to be accompanied by:

- An assessment of the advantages of a communal system vs individual systems.
- An accurate assessment of distribution heat losses
- A long term strategy for the sustainable supply of low carbon fuel.



A typical air source heat pump system. The heat pump is located on external wall gathers heat from surrounding air. The heat pump alternates between providing space heating and hot water in the dwellings.

### Development specific considerations

#### Retrofitting heat pumps in existing buildings

Air Source Heat Pumps can be retrofitted into existing buildings if there is a suitable location for the outdoor unit. Heat pumps run best at lower temperatures (around 35-45 °C) and are suited to underfloor heating and larger radiators. However, existing radiators may be sufficient if the building is moderately energy efficient. If the existing building has poor energy efficiency, improvements should also be made to the building fabric, as part of a considered whole house retrofit plan.

If a gas boiler is being replaced during an extension or refurbishment replace with an Air Source Heat Pump.

#### Other forms of low carbon heat

Wood or other biofuel may be considered on a case by case basis but are generally discouraged due to difficulties of sustainably sourced fuel and negative impacts on air quality and health.



# Renewable energy

Electricity demand is set to roughly double by 2050. The UK needs to decarbonise its power supplies in parallel with keeping up with this increasing demand. The provision of renewable energy within new development is therefore a vital contribution. It also provides benefits to occupants such as cheap energy and the ability to charge electric vehicles.

All developments should achieve an energy balance on-site where possible – that is, renewable energy generation should be equal to or greater than the development's energy consumption (or energy use intensity) over the course of a year. If this is not possible, renewable energy generation should target at least  $120 \text{ kWh/m}^2_{\text{footprint}}/\text{yr}$ .



## Solar photovoltaics (PV) are ideally suited to buildings

Solar photovoltaic (PV) panels generate electricity when exposed to sunlight. They are the most appropriate form of renewable energy generation for a building as they are a simple, mature and durable technology and can be installed on both roofs and suitable facades.

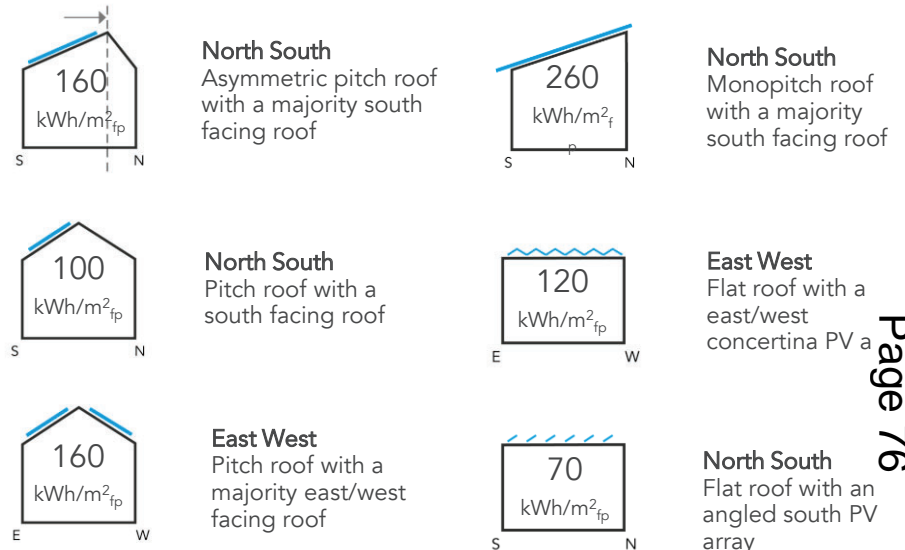
In the UK it is generally possible for blocks of flats up to six storeys in height to achieve a net zero energy balance on site through the use of rooftop solar PV arrays, heat pumps and efficient building fabric.

## Use of smart technology to maximise efficient use of energy

As energy use becomes increasingly electrified and energy generation more diversified, smart technology can help maximise benefits for occupants, the wider community and the electricity grid. Smart meters, appliances and electric car chargers can be set in a way that helps smooth out energy demand, and use energy when it's abundant. This will help occupants save money by using more of the renewable energy generated on-site, and import energy from the grid when it's cheaper.

## Roof design maximises solar photovoltaic energy generation

Solar photovoltaics should be considered at the very earliest of design stages in order that the roof shape and orientation is optimised to maximise solar photovoltaic output and returns for occupants.



Roof design can be optimised to maximise energy output from photovoltaics. How well the roof space is utilised can be expressed in  $\text{kWh}$  generated per  $\text{m}^2$  of building footprint ( $\text{kWh/m}^2_{\text{fp.}}$ )

## Development specific considerations

### Large scale developments

Community wind turbines may be suitable for large scale developments and will be considered on a case by case basis.

### Existing buildings, conservation and heritage

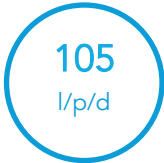
Solar photovoltaic arrays are suitable for both new and existing buildings. Listed buildings and conservation areas should seek the advice of the Conservation Officer.





# Water efficiency and domestic hot water

Water is a precious resource and pressure on water supplies is increasing. Climate change is bringing unpredictable patterns of precipitation putting further stress on resources. It's vital that all buildings use water efficiently. All developments should exceed the minimum building regulations requirements. For residential buildings, internal water use should achieve the water consumption target of <105 l/p/d.



## What you should do

- **Reduce flow rates** - The AECB water standards (opposite) provide clear guidance on sensible flow rates for showers and taps in low energy buildings.
- **Reduce distribution losses** - All pipework must be insulated and designed to ensure there are no 'dead legs' containing more than 1 litre. Tapping points (e.g. taps, shower connections) should be clustered near the hot water source.
- **Insulate to minimise losses from hot water tanks** - the standby losses of hot water tanks are highly variable, and can have a significant impact on overall energy use. Target a hot water tank heat loss of less than 1 kWh/day equivalent to 0.75 W/K.
- **Install waste water heat recovery systems in shower drains** - A simple technology that recovers heat from hot water as it is drained. Vertical systems can recover up to 60% of heat, horizontal systems 25-40%.
- **Consider water recycling** - This is the process of treating waste water and reusing it, it can be used for large portions of potable water use.
- **Choose planting and landscaping schemes that do not rely on irrigation.**

| Appliance / Fitting | AECB<br>Good Practice Fittings Standard  |
|---------------------|--|
| Showers             | 6 to 8 l/min measured at installation. Mixer to have separate control of flow and temperature although this can be achieved with a single lever with 2 degrees of freedom (lift to increase flow, rotate to alter temperature). All mixers to have clear indication of hot and cold, and with hot tap or lever position to the left where relevant.  |
| Basin taps          | 4 to 6 l/min measured at installation (per pillar tap or per mixer outlet). All mixers to have clear indication of hot and cold with hot tap or lever position to the left.  |
| Kitchen sink taps   | 6 to 8 l/min measured at installation. All mixers to have clear indication of hot and cold with hot tap or lever position to the left.   |
| WCs                 | ≤ 6 l full flush when flushed with the water supply connected. All domestic installations to be dual flush. All valve-flush (as opposed to siphon mechanism). WCs to be fitted with an easily accessible, quarter turn isolating valve with a hand-operated lever. Where a valve-flush WC is installed, the Home User Guide must include information on testing for leaks and subsequent repair. |
| Baths               | ≤ 180 litres measured to the centre line of overflow without allowing for the displacement of a person. Note that some product catalogues subtract the volume of an average bather. A shower must also be available. If this is over the bath then it must be suitable for stand-up showering with a suitable screen or curtain.   |

Refer to the full [AECB Water Standard documents](#) Volume 1 and Volume 2 for more information.



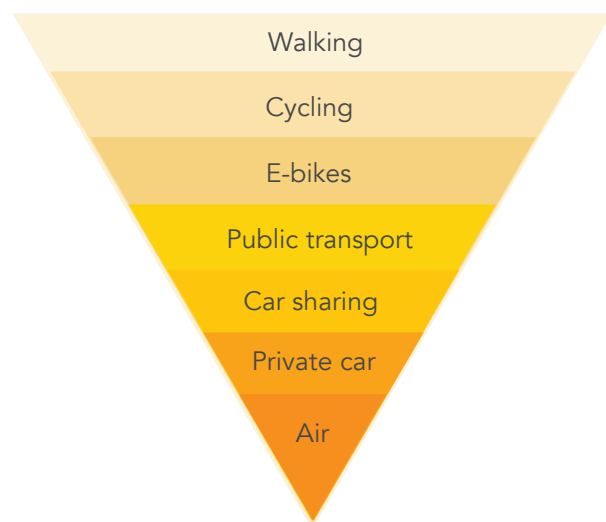
# Transport & travel

Transport contributes 24% of Cheltenham's CO<sub>2</sub> emissions - and almost all of these are from road transport. This proportion is growing year on year: as other sectors are decarbonising, emissions from transport have remained static since 2010.

All development proposals are expected to seek betterment over minimum requirements and support shifts in transport and travel behaviour towards the sustainable transport hierarchy below. Proposals should review the wider context of their site and provide strong and continuous links to existing footpaths, cycle routes and public transport nodes.

This has multiple benefits beyond saving energy and carbon: improved local air quality; health and wellbeing benefits from being more active; greater potential for social interactions and facilitating a car free life.

Development proposals should also demonstrate flexibility to respond to changing modal shifts in future years.



*The Transport Hierarchy - applications should prioritise the modes of transport in the order they appear in the transport hierarchy, in the design and amenity provided in developments.*

## What you should do

**Small scale sites (single homes, individual buildings)** should provide:

- Highly convenient (e.g. front of property), secure, well-lit, covered and inclusive cycle storage in accordance with BREEAM or Code for Sustainable Homes standards as a minimum.
- All parking spaces to be provided with electric car charging points
- The Transport for New Homes checklist should be submitted with each application.

**Medium and large scale sites:** as above plus development proposals will be required to demonstrate how they will:

- All proposed transport infrastructure should meet LTN 1/201 standards
- Facilities for cyclists, including lockers, showers and changing spaces should be provided (use Standards for Public Cycle Parking (2021)).
- Enable sustainable travel choices. Integrate high quality travel and transport infrastructure with consideration of and connection to walking, cycling and public transport routes beyond the site.
- Create open and permeable networks of streets and connected networks of green, off-road routes.
- Create direct connections to existing communities and facilities.
- Slow vehicle speeds (20mph) in all residential developments.
- Innovative and future flexible approaches to parking should be sought, including shared parking courts, shared parking between employment and residential uses and electric charging points in all parking spaces.
- Large expanses of surface parking will not be permitted.
- A full and comprehensive Transport Assessment and Travel Plan will be required to support the proposals.

# Flooding

A key impact of climate change for Cheltenham will be an increase in the frequency and severity of flood events. Cheltenham is already vulnerable to surface water flooding and has several areas at risk of flooding from the rivers like the Chelt. Overwhelmed drainage systems will also pose an increasing problem. It should be considered that all development, both existing and new, will be at risk of flooding in the future.

Therefore all developments should seek to:

- Ensure new development doesn't increase flood risk onsite or cumulatively elsewhere and to seek betterment over the minimum requirements wherever possible.
- Design buildings, streets and open spaces that are resilient to flooding, utilising flood resilient construction and implementing flood mitigation measures.
- Work with the natural landscape and its features to reduce the risk of flooding (not only on-site but also beyond the site) including Natural Flood Management (NFM) techniques
- Control the flow of water on-site through the use of Sustainable Urban Drainage Systems (SuDS) and take a creative approach to reduce the long-term risk of flooding and enable environments to absorb water.
- Maximise opportunities for betterment of water quality, amenity and biodiversity.
- Follow the drainage hierarchy - all surface water run-off must aim to be discharged as high up the following hierarchy as possible: rainwater re-use; infiltration; hybrid solution combining infiltration and discharge to a surface water body; to a surface water body; to a surface water sewer; to a combined sewer.

### Further information

- [The SuDS Manual \(C753\), CIRIA](#)
- [Susdrain, Delivering SuDS \(including retrofitting SuDS\)](#)

### Flood risk management hierarchy

|          |   |
|----------|---|
| Assess   | Provide an appropriate flood risk assessment  |
| Avoid    | Avoid development in areas of high risk of flooding. Do not increase the risk of flooding on-site or elsewhere. |
| Control  | Incorporate SuDS design   |
| Mitigate | Employ flood resilient construction   |

### What you should do

- SuDs should be utilised on every site, considered at every scale and designed in from the beginning of a project.
- Slow the flow – through planting hedgerows, trees, buffer strips.
  - Store water – through rainwater harvesting, green roofs, permeable paving, bioretention systems (e.g. rain gardens), trees swales, ponds, wetlands, detention basins, infiltration basins, soakaways
  - Increase infiltration – through improving soil structure, creating permeable surfaces.
  - Intercept rainfall - Vegetation, especially tree leaves, intercept rainfall so it doesn't reach the ground.
  - Ensure floor levels are more than 600mm above the flood level predicted for a 1:100 year flood event (plus climate change).
  - Utilise flood resilient materials and construction methods that allow a building to recover more quickly after a flood.
  - Provide safe access and egress routes above the predicted flood level.
  - Large areas of impermeable hardstanding should be avoided.



# Ecology and biodiversity

All proposals need to protect existing and enhance future biodiversity value. This should be considered with due regard for proportionality and the scale of development, but in all cases high quality, resilient and contextually appropriate ecological and green infrastructure should be the outcome of design.

**Connectivity** – Provide ecological habitats that build upon existing networks and natural capital both on the site, create new stepping stones and corridors that increase connectivity allowing wildlife places to forage and shelter and routes along which to travel.

**Context** – Assess the natural capital in the site. Applications will be assessed on how well existing habitats and features have been preserved and enhanced.

**Diversity and complexity** - Create diverse, complex and locally appropriate habitats.

**Wellbeing** - Design multifunctional green infrastructure that supports the health and wellbeing of people through creating space for active travel, recreation, and connection with others and with nature.

**Nature recovery** - Create habitats that positively enhance biodiversity contributing to the Nature Recovery Network, meet the Gloucestershire Local Nature Recovery Strategy priorities but overall, successfully delivering biodiversity net gain.

**Resilience** – Design green infrastructure and select species with consideration to their resilience to the effects of climate change and long term sustainability in mind. Planting should not require irrigation.

## What you should do

### Biodiversity Net Gain (BNG)

Apply the BNG mitigation hierarchy: avoidance; minimisation and compensation. Where BNG cannot be delivered onsite, contact the Gloucestershire Nature and Climate Fund (<http://glosnature.com>) for support with a suitable off-site strategy as compensation.

**Small scale sites (single homes, individual buildings)** should show evidence of considerations made, such as:

- Bird & bat boxes / bricks
- Insect habitats
- Ponds
- Grasscrete driveways
- Gaps in fences or hedges for small animals to move between gardens.
- Native trees, shrubs and flowers
- Green roofs

**Large scale sites** as above, plus:

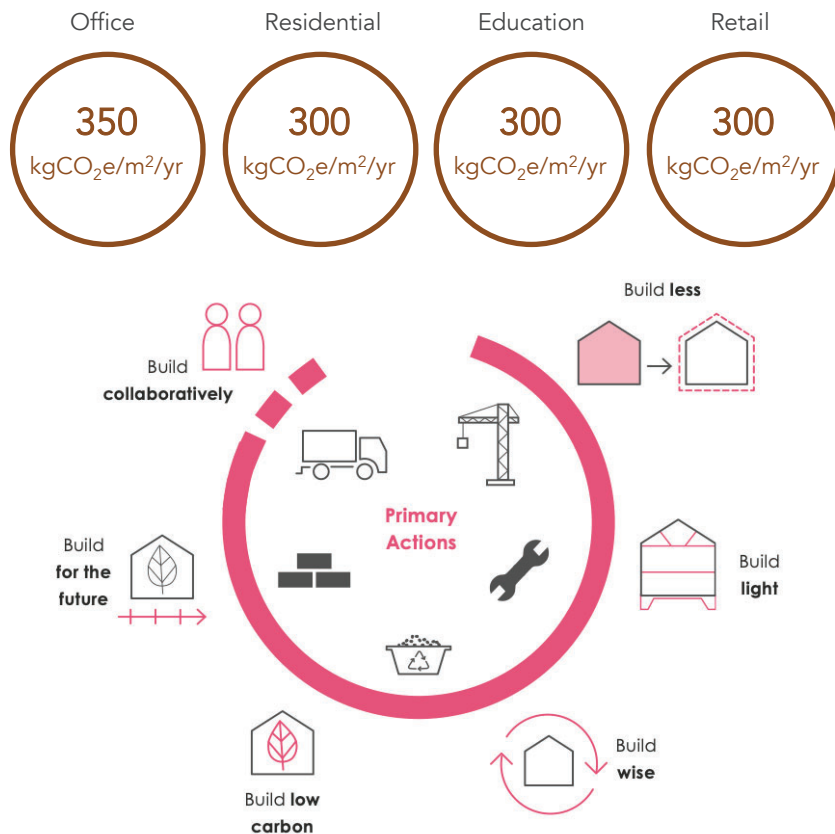
- Incorporate **Building with Nature** principles, helping to shape multifunctional green infrastructure for people and nature
- Assess the existing ecological value of a site to determine the presence of UK protected and priority habitats and species. Consult the **Gloucestershire Centre for Environmental Records** for local records.
- Protect and enhance existing features for biodiversity, ensuring local baseline and opportunity maps for the Nature Recovery Network are used to plan wider ecological objectives going beyond the site.
- Proposals to include an assessment of existing and proposed natural capital assets on and off-site ([www.naturalcapital.gcerdata.com](http://www.naturalcapital.gcerdata.com)).
- Include blue infrastructure such as ponds, lakes, streams, rivers to enhance biodiversity, manage flood risk and provide amenity.
- Ecological assessments should include the site's ecology at the time of, and 5 years prior to, application for planning.



# Materials and embodied carbon

Upfront embodied carbon includes the carbon emissions associated with the extraction and processing of materials, energy use in the factories and transport as well as the construction of the building. As buildings decarbonise their energy use, embodied carbon becomes an increasingly significant source of emissions to tackle.

All developments should seek to minimise upfront embodied carbon and monitor progress against the following targets as per [LETI guidance](#).



Primary actions for reducing embodied carbon. Image from LETI.

## What you should do

### 1 Refurbishment over new build

Only build new when existing homes cannot be reused or refurbished.

### 2 Lean design

**Structural:** Design structure for 100% utilisation. Use bespoke loading assumptions, avoid rules of thumb. Reduce spans and overhangs.

**Architectural:** Use self-finishing internal surfaces. Reduce the quantity of metal studs and frames.

**Building services:** Target passive measures (e.g. improved fabric) to reduce the amount of services. Reduce long duct runs, specify low Global Warming Potential (GWP) refrigerant (max. 150) and ensure low leakage rate.

### 3 Material and product choice

Prioritise materials that are reused, reclaimed or natural from local areas and sustainable sources and that are durable. If not available use materials with a high recycled content. Use the following material hierarchy to inform material choice particularly for the building structure;

1. Natural materials e.g. timber
2. Concrete and masonry
3. Light gauge/Cold rolled steel
4. Hot rolled steel

Ask manufacturers for Environmental Product Declarations (EPD) and compare the impacts between products in accordance with BS EN 15804

### 4 Housing adaptation & flexibility

Allow for flexibility and consider how a layout may be adapted in the future.

### 5 Easy access for maintenance

Maintained equipment will last longer.

### 6 Design for disassembly

Consider disassembly to allow for reuse at the end of life of the building. Create material passports for elements of the building to improve the ability of disassembled elements to be reused.

# Waste

The appropriate management of waste can aid the delivery of cost effective and efficient waste collection services and reduce Cheltenham’s impact on climate change.

To reduce this impact effectively, the waste hierarchy principles (prevent, reuse, recycle, recover and environmentally sound disposal) must be applied to three areas of the design and construction process:

1. In the design of recycling storage in both new and existing buildings.
2. In the sourcing and selection of building and construction materials.
3. In the management of waste through the construction process.

Proposals must demonstrate how this will be done (e.g. through a Waste Minimisation Statement).

## Key design considerations in minimising waste during occupation

- Provide dedicated, practical and sufficient internal space for sorting and storing of different waste streams: food waste, recyclable waste, garden waste, general waste and other relevant waste streams.
- Provide dedicated, practical and sufficient space outside for storing different waste streams until collection (and keep the off the public highway/pavement).
- Ensure ease of access to external waste storage for residents and building users.
- Enable ease of collection by refuse lorries by providing sufficient access and appropriate areas for turning where necessary.



## What you should do

### Apply circular economy principles

In selecting materials, products and systems for a development, there are two considerations. First is how these are sourced, second is how they can be successfully reused, repaired, refurbished and recycled through their serviceable life. Achieving this will lead to a circular economy in construction.

### Develop a construction waste management plan

Waste and water consumption should be minimised throughout construction. A plan should both contain target rates for recycling and define processes to manage different waste streams. This plan should also contain a commitment to preventing any biodegradable waste going to landfill.

### Integrate recycling storage

In all cases, provide on-site recycling and waste storage where convenience, usability and accessibility (including for residents with reduced mobility), safety, security and functional adaptability are made central design considerations.

**Domestic extensions** - Consider improving storage space for recyclable waste as part of a kitchen re-design or addition of a utility room.

**Non-domestic buildings** - Ensure staff, customers, clients and visitors are able to engage in recycling and effective waste management through the provision of clear, well signed, clearly labelled, easily accessible and conveniently located recycling and waste collection facilities.

Where appropriate, specific provision should be made to facilitate the national Deposit Return Scheme (DRS)

**Large developments and flats** - Consider use of accessible, communal underground waste storage for efficient storage of waste.





# Heritage buildings and conservation areas

## New development

Designing a new building or development to standards of net zero carbon can be done sensitively within a historic setting: the contemporary becoming a distinct and celebrated feature sitting alongside the traditional.

The architectural drawings for new development should consider form and the materials selected in their design for a building to be acceptable within the context of a sensitive setting.

Early conversations with Conservation Officers are recommended to ensure that the most can be achieved for net zero carbon whilst also ensuring a development meets local conservation design policies.

## Retrofitting historic buildings

Changes to the historic environment can be managed and a balance found that meets objectives for both conservation and climate change.

Start a project with an understanding of a building’s age, nature and characteristics and the particular features of heritage value and significance that will require conservation. This information is needed in the early stages of design so that a retrofit project can be planned responsibly and sensitively.

Use PAS (Publicly Available Specification) 2035 as a retrofit standard, working with an accredited Retrofit Co-ordinator, to ensure your project can reach its goals for net zero carbon. A Retrofit Co-ordinator will help to develop a bespoke plan using a ‘fabric-first’ and ‘whole-house’ approach.

Energy-efficiency measures should be selected to conserve and protect the existing fabric and building features and low-carbon heating and renewable energy generation should be sited to minimise their visual impact on the surrounding setting.

## Energy efficiency

Insulation can be added to pitched roofs, rafters and flat roofs: consideration should be given to existing eaves and abutments. Solid wall, early-cavity wall, timber-frame walls and floors can all be insulated using the correct materials and methods, good detailing and high standards.

The thermal performance of windows can be enhanced through careful restoration, draught proofing and secondary glazing. Where windows need replacing, liaise with the Conservation Officer to ensure this is done sensitively. This is especially important in the case of listed buildings. When planning energy-efficiency measures, ensure there is adequate ventilation to minimise condensation and reduce risk of damp.

## Renewable energy generation and Solar PV

Solar PV should be positioned - in terms of pitch and orientation - to maximise its efficiencies for renewable energy generation. The siting of Solar PV should be well considered to minimise visual impact. In recent years, Solar PV has become an accepted addition within the historic environment as a contrasting feature that serves to illustrate a building’s continued life story as it moves into the modern world.

## Further guidance

Historic England have produced guidance on a variety of energy efficiency and renewable energy interventions for historic buildings and conservation areas - [Historic England, Energy Efficiency and historic buildings](#).



## Local case studies

### New-build - Detached PassivHaus, Cheltenham

This detached home is located in a conservation area in Cheltenham. It was built in 2013 and achieved PassivHaus certification. Ultra-energy efficient walls, floor and roof and triple glazing are utilised. Central heating and hot water is provided by Air Source Heat Pumps located inside the building and ducted to outside, so there are no outdoor units. Ventilation is provided with a Mechanical Ventilation with Heat Recovery (MVHR) system, providing clean, filtered air to the interior. A 9.9 kWp photovoltaic array is installed on the roof. Through also using a battery, in the summer months, almost no electricity is imported from the grid, as the photovoltaic panels generate enough energy to power both the home and the electric car. Over the whole year, the home generated as much energy as it used in 2021.



*Passivhaus, Cheltenham*

### Domestic retrofit - 57 Naunton Lane, Cheltenham

This semi-detached Victorian homes has undergone a whole house retrofit, including: internal and external insulation, triple glazing at the back, double glazing at the front, a solar gain conservatory, LED lighting, Air Source Heat Pump and a 1.76 kWp Photovoltaic array on the roof. Excess energy from the solar panels is used to heat hot water.



*57 Naunton Lane*

### Domestic retrofit - Grosmont, 1930s detached house, Cheltenham

Grosmont has improved its energy efficiency through the installation of triple glazing (6x better at keeping the heat in than the original windows), loft insulation and LED lighting. The house is heated by an Air Source Heat Pump, and renewable electricity is generated by a 5.1 kWp solar photovoltaic array. A battery backup system has also been installed, which allows the occupants to more efficiently use energy generated by the photovoltaic panels. Solar thermal hot water tubes also provide a proportion of the hot water needed for the home.



*Grosmont, Cheltenham*



## More case studies for new build

### Ultra low energy design is fast becoming the new normal

Many self builders and developers are choosing to go beyond building regulations for energy efficiency because it makes sense. Not only can low energy building be cheaper to run, they can be easier and cheaper to maintain and crucially, will not need further expensive retrofit in the future.

### Beautiful and efficient homes

Lark Rise in the Chiltern Hills is certified to Passivhaus Plus standards. It is entirely electric, and generates 2.5 times as much energy as it consumes in a year. Careful optimised design has meant that it has a mostly glazed facade, minimal heat demand and stable temperatures over summer months.

### Passivhaus/Ultra-low energy can be delivered at scale

Developers are building Passivhaus at scale. Example developments include Springfield Meadows in Oxfordshire, which delivered social and private housing to exemplary standards, including ultra energy efficient fabric with low embodied carbon and nature based solutions to landscaping and SuDS. Other examples include a mixture of houses and flats at Wimbish, Essex (where the average heating costs for the houses are £130/year), Goldsmith Street in Norwich, Agar Grove in Camden and many other developments across the Country.

### All types and scales of buildings can be low energy

There are many examples of low energy non-domestic buildings. Oak Meadow Primary School in Wolverhampton was one of the first PassivHaus certified schools in the UK. Large windows allow for useful solar heating in the winter, while external shading limits overheating in the summer. Spaces are ventilated through openable windows and ventilation panels in the summer, and with the mechanical ventilation system with heat recovery in the winter.



**Lark Rise, Chiltern Hills.**  
Passivhaus Plus certified.  
(Source: Bere:architects)



**Springfield Meadows**  
(Source: Greencore construction  
with Bioregional)



**Oak Meadow Primary School**  
(Source: Architype)

## More case studies for retrofit

### 80% House, East London

The 80% house, a regency terrace house in East London, underwent a retrofit for energy efficiency in 2008 with no detriment to the external aesthetic of the house. The house features internal wall insulation, cavity wall insulation at the rear with reclaimed bricks, roof insulation, mechanical ventilation with heat recovery and photovoltaic panels. The house achieved an 80% reduction in carbon emissions.



*80% House, East London*

(Source: Prewitt Bizeley Architects)

### 47 Greenleaf Road, Waltham Forest

Waltham Forest Council identified 47 Greenleaf Road for a pilot project for retrofit in the area. It underwent a retrofit for energy efficiency and realised a 54% reduction in energy required for heating. The property features external wall insulation at the side and the rear, internal wall insulation at the front, roof and floor insulation, new double glazing, a mechanical ventilation system with heat recovery. The heating system was replaced with an air source heat pump, and photovoltaic panels were installed.



*47 Greenleaf Road*

(Source: Waltham Forest Council)

### New Court, Trinity College, Cambridge

New Court, Trinity College Cambridge is a Grade I listed building that underwent a sensitive retrofit to improve energy performance and comfort. The retrofit realised an 88% reduction in carbon emissions, and a 75% reduction in energy demand. It features internal wall insulation, low temperature underfloor heating and a new mechanical ventilation system with heat recovery.



*New Court, Trinity College Cambridge.*

*Grade I listed*

(Source: CIBSE Journal)

# Climate Change Checklist

The Council will consider all planning applications using the SPD as a material consideration in their determination. Applicants are expected to implement local guidance and demonstrate alignment with these standards as part of the design and development of their proposals.

## Energy efficiency

- ☐ Have you maximised opportunities for natural solar gain and natural ventilation and minimised overheating risk through passive design and attention to building location, orientation and form?
- ☐ Have you designed the fabric of the building to be ultra-low in energy demand, achieving KPIs for space heating demand (kWh/m<sup>2</sup>/yr) and energy use intensity (kWh/m<sup>2</sup>/yr)?

## Low carbon heat

- ☐ Will the building be fossil-fuel free with low-carbon heat source independent of the gas network?

## Renewable energy

- ☐ Has the design and shape of the roof been optimised for maximum output of a photovoltaic array?
- ☐ Does the building achieve a net zero-operational carbon balance and deliver 100% of its entire predicted energy consumption using renewables on-site?

## Water

- ☐ For dwellings: have water-efficiency measures been incorporated and will fixtures and fittings be specified to achieve water consumption of <105 l/p/d?

## Transport & Travel

Reduced travel:

- ☐ Have you made provision for home working in residential buildings?
- ☐ Is shared mobility encouraged within your transport plans for non-domestic buildings?

Active travel:

- ☐ Have you enabled sustainable travel choices with connections for cycling, walking and public transport, providing cycle parking and facilities to levels that sufficiently meets the needs of building occupants irrespective of age or ability?

Low-carbon transport infrastructure:

- ☐ Have you provided active charging infrastructure for electric vehicles, meeting standards and sufficient for the needs of building occupants?

## Prevention of Flooding

- ☐ Have you carried out a flood risk assessment to ensure your development avoids areas at high risk of flooding?
- ☐ Have measures to reduce flood risk been included in your proposals and are these designed using nature-based solutions and methods of sustainable urban drainage?

## Ecology and biodiversity

- ☐ Do you know what ecology and biodiversity are on your site and beyond it, and have you taken steps to both preserve what is already there and enhance ecological value in the future?

## Embodied carbon

- ☐ Have you minimised embodied carbon in the design of the building and in the selection of materials for its construction?
- ☐ Do your assessments of embodied carbon meet LETI targets and take full account of all construction elements including substructure, superstructure, mechanical, electrical and plumbing, products and finishes?

## Waste

- ☐ Do you provide adequate space, both inside and outside the building, for waste recycling and storage?
- ☐ Have you incorporated targets and site management processes to minimise water consumption through construction and minimise and recycle waste, reducing waste going to landfill?

Responding to our policies

The matrix below indicates which local policies relate to what guidance within this SPD.

|  | Key Performance Indicators | Site orientation and shading | Avoiding overheating | Form | Fabric, detailing and materials | Ventilation | Low carbon heat | Renewable energy | Water efficiency | Transport | Flooding | Ecology and biodiversity | Embodied carbon | Waste |
|--|----------------------------|------------------------------|----------------------|------|---------------------------------|-------------|-----------------|------------------|------------------|-----------|----------|--------------------------|-----------------|-------|
| Joint Core Strategy 2011-2031                    |                            |                              |                      |      |                                 |             |                 |                  |                  |           |          |                          |                 |       |
| SD3 Sustainable Design and Construction          | ●                          | ●                            | ●                    | ●    | ●                               | ●           | ●               | ●                | ●                | ●         | ●        | ●                        | ●               | ●     |
| SD4 Design Requirements                          |                            | ●                            |                      |      |                                 |             |                 |                  |                  | ●         | ●        | ●                        |                 |       |
| SD9 Biodiversity and Geodiversity                |                            |                              |                      |      |                                 |             |                 |                  |                  |           | ●        | ●                        |                 |       |
| SD14 Health and Environmental Quality            |                            |                              |                      |      |                                 |             |                 |                  |                  |           | ●        | ●                        |                 |       |
| INF3 Green Infrastructure                        |                            |                              |                      |      |                                 |             |                 |                  |                  |           | ●        | ●                        |                 |       |
| Cheltenham Plan                                  |                            |                              |                      |      |                                 |             |                 |                  |                  |           |          |                          |                 |       |
| Theme C Objective d                              | ●                          | ●                            | ●                    | ●    | ●                               | ●           | ●               | ●                | ●                | ●         | ●        | ●                        | ●               | ●     |
| Policy D3 Private Green Space                    |                            |                              |                      |      |                                 |             |                 |                  |                  |           |          | ●                        |                 |       |
| Gloucestershire Local Transport Plan (2020-2041) |                            |                              |                      |      |                                 |             |                 |                  |                  |           |          |                          |                 |       |
|  |                            |                              |                      |      |                                 |             |                 |                  |                  | ●         | ●        | ●                        |                 | ●     |
| Gloucestershire Waste Core Strategy              |                            |                              |                      |      |                                 |             |                 |                  |                  |           |          |                          |                 |       |
| Policy WCS2 – Waste Reduction                    |                            |                              |                      |      |                                 |             |                 |                  |                  |           |          |                          |                 | ●     |

## Further information

**The Net Zero Carbon Toolkit**, Cotswold District Council, West Oxfordshire District Council and the Forest of Dean District Council. October 2021.

<https://www.cotswold.gov.uk/media/05couqdd/net-zero-carbon-toolkit.pdf>

**Historic England: Energy Efficiency and Old Buildings,**

<https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

**Bath and North East Somerset, Energy efficiency, retrofitting, and sustainable construction Supplementary Planning Document -**

[https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Sustainable-and-Retrofitting/scrf\\_adoption\\_draft\\_spd.pdf](https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Sustainable-and-Retrofitting/scrf_adoption_draft_spd.pdf)

**Transport for New Homes checklist -**

<https://www.transportfornewhomes.org.uk/wp-content/uploads/2019/10/checklist.pdf>.

**Standards for Public Cycle Parking, June 2021 -**

<https://2z30i71k4m1tu9odh1fx8yq1-wpengine.netdna-ssl.com/wp-content/uploads/2021/06/05132-Cycle-Parking-and-Security-Standards-June-2021-REV-6.pdf>

**Building with Nature -** ([www.buildingwithnature.org.uk](http://www.buildingwithnature.org.uk)).

**Gloucestershire Centre for Environmental Records,** ([www.gcer.co.uk](http://www.gcer.co.uk))

**The Growth Hub** – Tools, resources and advice to help businesses get to net zero. <https://www.thegrowthhub.biz/netzero>



# Glossary

**Air Source Heat Pumps (ASHP)** – an electric heating system that gathers ambient heat from surroundings to efficiently heat a dwelling.

**Air-tightness** – A measure of how much air naturally leaks out of or into a building, through gaps around doors, windows, keyholes etc. Usually measured in  $\text{m}^3/\text{m}^2/\text{hr}$  @ 50Pa.

**Building fabric** – a term used to describe collectively the walls, roof, floor, windows and doors of a building.

**Carbon budgets** – a term used to state remaining carbon emissions, or share of carbon emissions, that can be emitted before the amount of cumulative emissions exceeds that aligned with a given atmospheric temperature change.

**Carbon footprint** – the amount of carbon emitted by a person or organisation in a given timeframe.

**Carbon offsets** – a way of balancing emissions in one area by reducing emissions in another or by sequestration of carbon\*.

**Climate resilience** – enabling a building, dwelling, geographical area or organisation to adapt to the changing climate.

**CO<sub>2</sub>** – carbon dioxide, a greenhouse gas.

**Coefficient of Performance (CoP)** – a measure of efficiency usually used when describing heat pumps. The CoP is the amount of useful heat (or coolth) produces from every kilowatt of electricity used. E.g. a heat pump with a CoP of 3 produces 3 kW heat for every 1 kW of electricity it uses.

**Communal heating system** – a multi dwelling heating system.

**Energy efficiency** – the relative amount of energy a building or system uses to achieve a certain aim (e.g. maintain a specific internal temperature)

**Fabric Efficiency** – a measure of how effective a building's fabric is at retaining heat or staying cool.

**Greenhouse gas** – a gas that retains heat in the atmosphere, e.g. carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>).

**ktCO<sub>2</sub>** – kiloton of CO<sub>2</sub>, a measure of the amount of carbon dioxide emitted or offset.

**kWh** – kilowatt hour, a measure of the amount of energy used or generated in one hour.

**Leaky building** – A building with a low level of air-tightness.

**Mechanical Ventilation with Heat Recovery (MVHR)** – a form of building ventilation that recovers heat from stale air before it is vented outside the building and uses it to warm incoming fresh air.

**Net Zero Carbon** – where the amount greenhouse gases emitted by an organisation are equivalent to the emissions either: i) sequestered or offset ii) displaced by production of renewable energy.

**Renewable energy** – energy from a renewable source e.g. wind or solar.

**Space heating demand (SHD)** – the amount of heat energy required to heat a space. SHD is a reflection of building fabric efficiency and is usually expressed in  $\text{kWh}/\text{m}^2/\text{yr}$ .

**\*Sequestration** – the storing of carbon in land based assets.

**Solar photovoltaic (PV)** – a form of renewable electricity generation from solar energy well suited to buildings and urban environments. Can be stated in installed capacity (kW), annual generation (kWh/yr) or annual generation per  $\text{m}^2$  of building footprint ( $\text{kWh}/\text{m}^2/\text{yr}$ )

**Waste Water Heat Recovery (WWHR)** – A proprietary system fitted to the outlets from sinks, showers and baths, which collects heat from the waste water and transfers it to the cold water feeding a hot water store.

**Whole House Retrofit** – where a building is retrofitted for energy efficiency in an holistic manner, and many different fabric elements and systems are considered at once.

# Climate Change Supplementary Planning Document: Consultation Statement

## 1. Introduction

- 1.1. This statement is the 'Consultation Statement' for the Climate Change Supplementary Planning Document (SPD). It has been prepared as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the consultation undertaken and summarises the comments received during the consultation period, including details of how the issues raised have been dealt with in working towards a final SPD for adoption.

## 2. Town and Country Planning Regulations

- 2.1. The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.
- Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD.
  - Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.
  - This statement is the 'Consultation Statement' for the SPD as required by Regulation 12(a). The document also sets out information about the consultation as required by Regulation 12(b). Following the consultation period, as the SPD progresses towards adoption, the 'Consultation Statement' will be expanded to recognise involvement by outside bodies and public participation during this consultation period.
  - Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. This consultation statement sets out this requirement.
  - Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:
    - Make the document available at the principal office and other places within the area that the Council considers appropriate;
    - Publish the document on the Council's website.

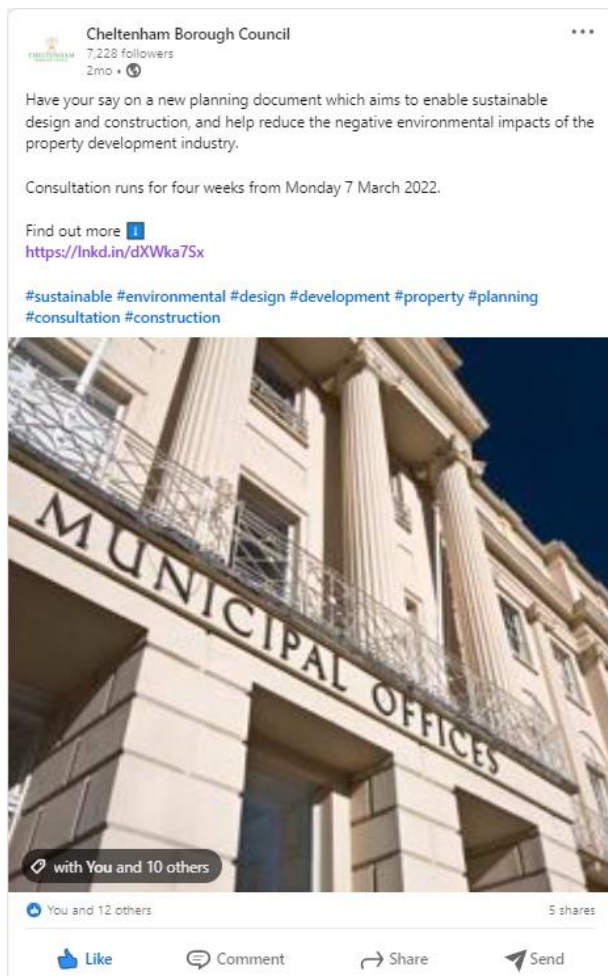
## 3. The Statement of Community Involvement (SCI)

- 3.1. This consultation statement has been prepared within the context of the Cheltenham SCI and reflects the 2012 Regulations, set out above. The relevant SCI's set out how the councils will consult and involve people in the preparation of local plans, including Supplementary Planning

Documents. Consultation on the draft SPD was carried out in line with the principles of the adopted SCI.

## 4. Draft SPD Consultation

- 4.1. Consultation on the draft SPD was carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The SPD and its accompanying consultation was made available for inspection by the public for a four week period between Monday 7<sup>th</sup> March 2022 and midnight Monday 4<sup>th</sup> April 2022. A copy of the SPD and this consultation statement was made available to view at <https://haveyoursay.cheltenham.gov.uk/>
- 4.2. Hard copies of the document were available on request and will be available to view in local libraries.
- 4.3. The consultation was advertised on the Council's website and press release that can be viewed on the following link:  
[https://www.cheltenham.gov.uk/news/article/2653/new\\_planning\\_document\\_drives\\_positive\\_change\\_with\\_local\\_developers\\_to\\_tackle\\_the\\_climate\\_emergency](https://www.cheltenham.gov.uk/news/article/2653/new_planning_document_drives_positive_change_with_local_developers_to_tackle_the_climate_emergency)
- 4.4. The release was picked up by the trade publication, The Planner, on their website:  
<https://www.theplanner.co.uk/news/council-consults-on-climate-change-planning-document>
- 4.5. Details of the consultation were also published on the Council's social media accounts. Below is an example of the LinkedIn post:





4.6. All interested parties were invited to make comments, these included:

- Specific consultation bodies that the Council consider may have an interest in the Local Plan;
- general consultation bodies that the Council consider appropriate; and
- such residents or other persons carrying on business in the District which the Council consider appropriate to invite representations from.

4.7. Appendix 2 of the SCI provides a list of the specific and general consultation bodies.

## **5. Summary of responses**

5.1. The following table summarises the main issues raised by the respondents and how those issues have been addressed in the final SPD.

| Summary of key issues  | Officer response  | Summary of amendments made to SPD  |
|--|---|--|
| The Council is too small to make any real difference to climate change.  | Councils have a significant part to play in tackling climate change and should strive to set a strong example for others to follow suit. The benefits of responding to climate change are numerous.                   | None.  |
| Restore Cheltenham-Honeybourne-Stratford railway.  | Outside the scope of this SPD.  | None.  |
| Council tax reduction for the best performing properties with no VAT charged on carbon reducing products.  | Outside the scope of this SPD.  | None.  |
| Restrict paving over grass/gardens and remove rules that prohibit homeowners from creating habitat spaces.   | Outside the scope of this SPD.  | None.  |
| Include reference to the drainage hierarchy, whereby surface water discharges are managed sustainably avoiding connections into the foul or combined public sewer network. |   | Reference to the drainage hierarchy has been added to the Flooding page. |
| Where will the extra electricity will come from for heat pumps and electric cars?  | The KPIs have been formulated by the London Transformation Initiative. Their analysis included future electricity demand predicted by the National Grid, resulting in ambitious but achievable KPIs.                  | None.  |
| The document discourages use of wood burning stoves. I believe this is unwise and untenable because of the need for resilience in our energy systems.                      | Wood fuel will be considered on a case by case basis. The SPD does not want to encourage biomass heating for large developments, or where alternatives are possible due to air quality and sustainable supply issues. | None.  |
| LETI not defined.  |   | LETI acronym expanded.   |
| Incorrect date on carbon budget graph.   |   | Carbon budget graphs adjusted to show from 2022.                         |
| Energy Use Intensity (EUI) definition incorrect, no mention of period or area.   |   | EUI definition clarified to include /m2/yr                               |

|   |   |  |
|---|---|--|
| Is EUI of 15-20 compatible with pandemic levels of ventilation?   | The space heating demand is a good KPI to ensure efficient fabric design. It does not preclude people opening windows and ventilating more during occupation, although this KPI if measured may not be achieved in occupation if this was the case, the building has the potential to use very little energy for space heating while still maintaining excellent air quality. | None.  |
| Recommended embodied carbon 350 kgCO <sub>2</sub> e/m <sup>2</sup> /yr is too high.   | Embodied carbon figure an evidence based target based on the work of LETI. More work needs to be done on embodied carbon before introducing more stringent targets.   | None   |
| Include high winds 100+ mph like recent storms.   |   | Reference to high winds added to one-pager.  |
| No mention of sound insulation and multiple occupancy blocks.   | Sound insulation is part of the building regulations and not repeated in this concise SPD.  | None.  |
| Can a clause be added, "planning should measure Biodiversity with a baseline of the site's most abundant state from the preceding 5 years."   |   | The addition of a requirement to include the previous 5 years in ecological assessment has been added.   |
| Advise to use hedging for biodiversity instead of wooden fences between plots, use wire fences while hedge establishes.   |   | Possibility of hedges added to ecology page  |
| Add link to the LEP Growth Hubs if businesses would like advice and assistance on net zero issues. <a href="https://www.thegrowthhub.biz/netzero">https://www.thegrowthhub.biz/netzero</a><br><br>Also include the link to the Active Building Centre <a href="https://www.activebuildingcentre.com/">https://www.activebuildingcentre.com/</a> |   | Link to The Growth Hub added.<br><br>The Active Building Centre not mentioned specifically but smart technology has been included on the one pagers and renewable energy page. |
| Whole life carbon includes manufacture and transportation of materials, ongoing maintenance of the chosen materials and   | Recommendations that impact whole life carbon are included in the document but are not given specific targets.  | None.  |

|   |  |   |
|---|--|---|
| technologies (heat pumps, photo voltaic panels etc) and the eventual decommissioning and recycling of components or whole buildings.<br><br>Any development will place additional demands on local commercial, community and social infrastructure so these in turn will need to be expanded resulting in secondary carbon emissions.   | Expanding the supply of referenced local infrastructure to meet the demands of new developments is outside of the scope of this SPD.   |   |
| Ultimately some measures will depend on effective council planning enforcement.   | Fair point but outside the scope of this document itself   | None.   |
| Instead of questions, this needs to be set out as "demands".  | Cannot demand this, it would be over and above policy.   | None.   |
| It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. Standards need to be universally understood and capable of being technically implemented. | Planning policy has an important role to play in the battle against climate change. The recent changes to the NPPF added 'climate change' in several places but is not progressive enough. The Council wants to see ambitious and forward thinking development as set out in this SPD. | None.   |
| The context would be helpful to provide a bit of background context e.g. around CBC's intentions as a council   |  | A Foreword has been added.                                |
| We would prefer this document to be more Cheltenham specific and to include local examples and illustrations.   |  | Locally relevant case studies have been added.            |
| It would be better if the audiences were made clearer.  |  | The audience has been clarified on the introduction page. |

|  |   |   |
|--|---|---|
| We need to encourage re-use of existing structures wherever possible, especially if they are concrete heavy due to the embedded carbon.  |   | Preference for re-use of buildings over new development has been made on the Site and Orientation page.<br>A recommendation to prioritise brownfield over greenfield has been given on the site and orientation page. |
| The additional costs of developing strategic sites to the standards required by the SPD could easily result in them becoming unviable and contributing to a shortage in the supply of new housing.                       | Viability of a scheme can still be a factor in making a planning decision and the SPD does not override that, as it is national policy. Viable zero-carbon schemes, which meet affordable housing requirements, have been approved in Cheltenham. | None.   |
| The SPD should not be adopted unless it is consistent with adopted policies in a Local Plan and it should be made clear that it is guidance, not policy.   |   | Clarification on how this SPD relates to policies has been given in the opening pages.  |
| The water consumption target of 105 l/p/d is beyond the tighter Building Regulations optional requirement of 110 l/p/d, as described in the PPG (ref: 56-014-20150327).  |   | The building regulations requirement is 105 l/person/day for internal water use and 5 l/person/day for external water use (totalling 110 l/p/day). A clarification that this is internal water use has been included. |
| It would be good if the required level of provision sought by the SPD was aligned with current municipal waste management targets  |   | Added specific waste reduction targets to intro on waste page.  |
| To provide practical guidance for owners, the B&NES Sustainable Construction and Retrofitting Supplementary Planning Document (SPD) may be a helpful local reference.  |   | Reference to BNES climate change SPD given on the references page.  |
| Cheltenham Climate Change SDP should take account of the full range of LTP policy commitment and ensure that the matrix which Cheltenham local policies relate fully to the LTP and guidance within the SPD in terms of; |   | The policy reference matrix has been updated to reflect fully the LPT guidance including transport, flooding, ecology and biodiversity and waste.   |

|   |   |   |
|---|---|---|
| transport, flooding, ecology and biodiversity and waste.  |   |   |
| Given the significant number of design considerations and expectations, we would seek clarification on whether any transitional arrangements are to be put in place following its adoption.   | Transitional arrangement are not recommended as we want to make an impact as soon as possible.  | None.   |
| Suggestions made to improve cycling text on the Transport page.   |   | Requirement to meet LTN 1/201 standards included on Transport page.<br>Reference to "Standards for Public Cycle Parking" added to Transport page.<br>Major developments to also include features in minor developments list.<br>Wording in checklist amended to include "irrespective of age or ability". |
| There is a small paragraph on page 19 on district heating which is not very encouraging and fails to recognise that there is another alternative to single dwelling/building heat pumps. This is shared loop ground source heat pump systems. |   | Clarification has now been included that communal heating using ambient distribution temperatures is acceptable.  |
| Whilst there is a comment recommending early conversations with the Conservation Officer, the document needs to clearly state certain measures will not be suitable or acceptable for listed buildings/conservation areas.                    | Each case is assessed on its own merits having regard to the building. Heritage is an important material consideration that needs to be considered alongside the Climate Change SPD. The council also already has some information online about working with listed buildings and within conservation areas on schemes relating to energy efficiency and renewables:<br><a href="https://www.cheltenham.gov.uk/info/61/climate_and_sustainability/1689/energy_efficiency_renewables_and_our_built_cultural_heritage">https://www.cheltenham.gov.uk/info/61/climate_and_sustainability/1689/energy_efficiency_renewables_and_our_built_cultural_heritage</a> | None.   |

|  |   |   |
|--|---|---|
| Whilst there is reference at the very end of the document (page 31 responding to our policies) it would be much more beneficial to have the details explained as to how the SPD links to other planning policies e.g. the Local Plan, JCS, and schedule out the details as to what sections are relevant. As a planning document it needs to sit alongside these documents and make it clear to applicants how it does so. |   | Clarification on how this SPD relates to policies has been given in the opening pages.  |
| In the absence of policy-based justification, the Council should not be requiring new major development to exceed up-to-date and increasingly stringent national standards relating to greenhouse gas emissions.   |   | None.   |
| Suggested clarifications to the Ecology page (p24)   |   | Pg 24 - recommendations incorporated.   |
| Stop the trend of developers clearing land of all vegetation before applying for planning permission.  |   | A requirement to include the previous 5 years in ecological assessments has been included on the ecology and biodiversity page. |
| Some design aspects are not Cheltenham-friendly and encourage poor design  | Architects and developers should seek to optimise energy efficiency and high quality architecture, and the two need not be mutually exclusive. As evidenced in classic regency architecture which is simple, compact and highly regarded for its aesthetic. | None.   |
| Preference for BNG on sites can limit the benefits that can be achieved at landscape scale off site.   |   | Review of off-site nature capital enhanced on biodiversity and ecology page.  |
| No mention of a retrofit designer, this is an evolving role but necessary for detailing of measures as unlikely that standard detailing can be used and the RC is unlikely to fulfil this design requirement.  |   | The retrofit designer reference has been added to the one-pager.  |

|  |  |   |
|--|--|---|
| Development on derelict town centre sites should be prioritised over greenfield developments.  |  | The preference for brownfield over greenfield has been added to the page on "Site and Orientation".   |
| There is concern that the u-values specified in the SPD, along with the requirements for building orientation and large south-facing windows, would lead to overheating issues and the likely failure of Part O of the Building Regulations.                             |  | Good u-values should not lead to overheating if measures to reduce overheating risk are taken into account - these are already mentioned in the one-pagers, the dedicated page on overheating and various other pages ('Design and efficient building form' and 'Building fabric, detailing and materials').<br>Reference to the overheating risk assessment, as per the dedicated page on Overheating, has been added to the new-build one-page summaries.   |
| The inclusion of a dedicated guidance theme for 'Waste' is strongly supported. However, the text throughout this theme would benefit from re-working to better align with existing well-established policy requirements and local guidance on waste minimisation matters |  | Within the bounds of the page we have aimed to accommodate them as far as possible (It should be noted that a separate waste SPD may be produced): <ul style="list-style-type: none"> <li>- reference to "other relevant waste streams" is now included:</li> <li>- reference to the "Waste Minimisation Statement" has been added.</li> <li>- Reference to Gloucestershire Core Waste Strategy and policy WCS2 has been added to the policy/chapter matrix.</li> <li>- Use of some suggested wording throughout the Waste page.</li> </ul> |
| A checklist is welcomed however it is not clear which developments this relates to e.g. major, minor, domestic, offices etc. Will CBC be requiring a flood risk assessment for a domestic extension for example?   |  | Clarification on how this SPD relates to policies has been given in the opening pages.  |



|  |  |  |
|--|--|--|
| We would prefer the checklist on page 30 to be set out as a set of planning statements or requirements (if not, why not?) rather than questions.   | Cannot demand this, it would be over and above policy. | None.  |
| New homes should use induction technology as the most efficient option for cooking and water heating.  |  | Reference to efficient electric cooking appliances has been added to the one-pagers.   |
| <p>This section identifies JCS Policy SD3 'Sustainable Design and Construction' as the key policy to which the SPD relates. However, the guidance contained in the SPD is not supported by this policy.</p> <p>Part 1 of Policy SD3 states that: 'proposals (including changes to existing buildings) will be expected to achieve national standards'. The SPD expects proposals to exceed national standards.</p> <p>Part 2 of Policy SD3 states that: 'All development will be expected to be adaptable to climate change'; however, the SPD expects new development to help tackle climate change, rather than adapt to it.</p> |  | Clarification on how this SPD relates to policies has been given in the opening pages. |

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**CHEL TENHAM BOROUGH COUNCIL'S**

# **Climate Emergency Action Plan**

## **Pathway to Net Zero**

Our 2030 action framework to become a net zero  
Council and Borough



# Foreword

## From Cheltenham's Cabinet Member for Climate Emergency



Our planet is precious. Climate change is the biggest challenge we all face. That's why Cheltenham has joined hundreds of local areas around the country in declaring a climate emergency and setting an ambitious Net Zero goal. But in this discussion we cannot afford lose sight of why we must act. It's because we are all obliged to leave a better future for our children, grandchildren and everyone in future generations. The consequences of failing to act are often presented in negative terms, with the threats of extreme weather, migration crises, widespread poverty and much more besides. I like to point out the positives of taking the necessary action. If we have more plentiful clean energy supplies and energy efficient homes, fuel poverty will fall. If we promote and protect nature, our world will be more beautiful. If we switch short car journeys for walking and cycling or onto clean buses, people will be healthier and air quality will improve – and urban areas will become more social places too.

That's at the heart of our Climate Emergency Action Plan: Pathway to Net Zero. Cheltenham Borough Council's document sets out a wide range of actions that we must undertake to reach Net Zero. Some of these will be achievable by the Borough Council alone, but nearly all of them rely on the involvement of others. In many areas it's partnerships with the County Council. In other areas, it's a reliance on funding from the government. In nearly all, the involvement of local people and businesses will be crucial. Some of the changes to our everyday lives will barely be noticed, but others will be more revolutionary.

Whatever the scale of change, we must all bear in mind that we cannot afford not to act. But also that we can all contribute to a brighter future for all. Cheltenham can make a difference.

**Councillor Max Wilkinson**

Cabinet Member for Climate Emergency

February 2022

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# 1. Introduction

Cheltenham Borough Council (CBC) declared a climate emergency in July 2019 and committed to becoming a carbon neutral council and Borough by 2030. The motion received unanimous support and committed the Council to:

- Declare a 'Climate Emergency';
- Pledge to make Cheltenham carbon neutral by 2030, taking into account both production and consumption emissions;
- Call on the Government to provide the powers and resources to make the 2030 target possible; Work with other governments (both within the UK and internationally) to determine and implement best practice methods to limit Global Warming to less than 1.5°C;
- Continue to work with partners across the town, county and region to deliver this new goal through all relevant strategies and plans;
- Report to Full Council within six months with the actions the Council will take to address this emergency.

This declaration was quickly followed by our Carbon Neutral Cheltenham<sup>1</sup> report, published in October 2019, which provides the council with a set of indicative actions to reduce its own carbon footprint to net zero, as well as that of the wider borough. The council recognises that it cannot achieve this change alone

and welcomes the opportunity to pursue a collaborative cross-community approach to achieving net zero carbon emissions by 2030.



In recent times, our lives have been dominated by the economic and health impacts of the COVID-19 pandemic. In response, councils across the UK are implementing recovery plans to kick-start local businesses and look after the welfare of their communities. However, we know that the climate and nature crises haven't gone away and the urgency to act is now more important than ever.

The production of Cheltenham Borough Council's 'Climate Emergency Action Plan: Pathway to Net Zero' (CEAP or 'Pathway') sets out our aim to achieve the 2030 target by acting holistically as a town, not just as a council working in isolation. It is well evidenced that climate action has a range of wider benefits for the health, equity and prosperity of towns and their citizens. This plan therefore also considers the wider advantages of achieving net zero carbon and how we can ensure these benefits are engrained in the fabric of our aspirations.

Outlined here are the key steps needed to push forward this vast agenda and strive to achieve the 2030 goal. We have collated our actions based on eight categories to help provide focus to the broad impact of the climate emergency. The emerging programme from CEAP will be monitored on an annual basis up to 2030, with interim milestones, to ensure that the targets remain on track whilst the council continues to be dynamic to adapt quickly to market changes alongside any relevant new research, insights and innovations.

This pathway goes above and beyond the ambitions set out in the 2008 Climate Change Act, which committed the UK to reducing its greenhouse gas (GHG) emissions by 80% by 2050, compared to 1990 levels. Although, this target was made more ambitious in 2019 when the UK committed to reaching 'net zero' carbon by 2050, CBC's aim is to reach this target 20 years earlier than this.

However, since Cheltenham's Climate Emergency declaration called for the devolution of power and funding to local areas, financial pressures on local areas, specifically Local Authorities, have significantly increased.



## 2. Purpose of the Climate Emergency Action Plan

We strive for Cheltenham to be a thriving and equitable town, ensuring a good life for everyone within the Earth's natural boundaries. We want to be a town in which prosperity and wellbeing for everyone comes first. The aspiration for 2030 fulfils the Council's vision for Cheltenham to be a place:

### Where everyone thrives:

- **Where all our people and the communities they live in thrive**
- **Where culture and creativity thrives, and is celebrated and enjoyed throughout the year**
- **Where businesses and their workforces thrive**

In line with the Carbon Neutral Cheltenham<sup>2</sup> report, and in support of the above commitments set out in the Cheltenham Place Vision<sup>3</sup>, this CEAP has been developed as a framework, to help shape the Council's priorities for climate action across the borough for the period 2022-30. As set out in the Council's Corporate Plan 2019-2023, achieving a cleaner and greener environment for residents, businesses and visitors is a key priority<sup>4</sup>. The CEAP gives us the opportunity to:

- **Communicate our response to the climate and ecological emergency and share good practice**
- **Influence and shape the development of strategy and policy for climate at county, regional and national levels**
- **Make a positive impact towards the national effort to address climate change**
- **Work in partnership to take forward projects and initiatives that reduce the impacts of climate change**
- **Set an example to other Local Authorities yet to set a goal and pathway for becoming net zero.**

We know that waiting to take action is not an option and this pathway focuses on the actions we can take now, and over the coming years, to reach our 2030 target, as well as sharing what we have already achieved.

We expect that further adaptation and changes will be needed as climate innovation and advances in technologies improve our ability to achieve our goals in new and potentially revolutionary ways.

**We aim to be at the forefront of these advancements wherever possible and see this as a key element of our climate pathway.**

There will be further developments which we cannot yet foresee, such as changes in government policy, the emergence of new technologies and lessons learned through experience. Therefore, although the main goal of the 2030 CEAP will remain the same (i.e. to become a net zero council and borough by the year 2030), the action plan will remain flexible and be reviewed and updated annually, taking account of new research, developments, technologies, community needs, and funding opportunities.

<sup>2</sup> [www.cheltenham.gov.uk/info/61/sustainability/1622/climate\\_emergency/3](http://www.cheltenham.gov.uk/info/61/sustainability/1622/climate_emergency/3)

<sup>3</sup> [www.cheltenham.gov.uk/downloads/file/6343/cheltenham\\_place\\_vision](http://www.cheltenham.gov.uk/downloads/file/6343/cheltenham_place_vision)

<sup>4</sup> [www.cheltenham.gov.uk/downloads/file/7401/corporate\\_plan\\_2019-23](http://www.cheltenham.gov.uk/downloads/file/7401/corporate_plan_2019-23)





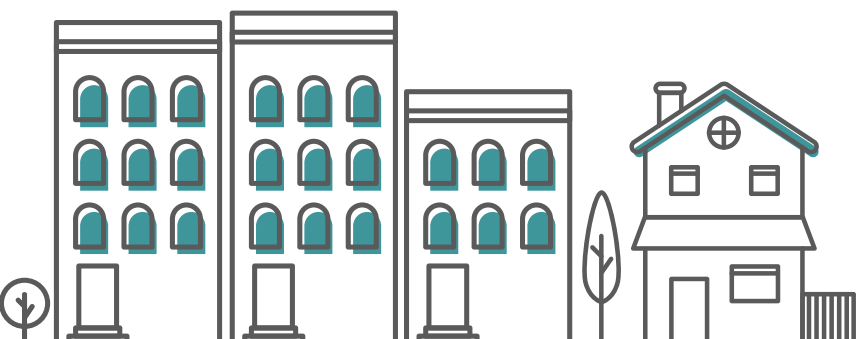
In addition to the benefits that achieving net zero carbon emissions will have on climate change, a well-managed carbon reduction programme will also offer substantial positive effects, known as co-benefits, on a wide range of other interrelated issues, including fuel poverty, air quality, health and wellbeing and economic growth.

The work required to meet our climate obligations also means developing climate resilience, which will include:

- **Mitigating flood risk**
- **Considering adaptations that reduce vulnerability to climate change impacts**
- **Developing a more tightly-knit community**
- **Planning for more green and natural space for both people and wildlife.**

This presents a great opportunity and necessity for the CEAP to set out a collaborative approach across the borough – a time for multiple partners to join forces to support the Council and the town in reaching its ambitious target.

This Pathway was prepared by the Council's Climate Emergency team and developed in conjunction with relevant stakeholders. Climate action plans from local authorities are already paving the way on the climate agenda and served as a basis for this Pathway, but a special thanks must be made to Friends of the Earth for their 'Climate Action Plan for Councils' 50-point plan<sup>5</sup>, which has been instrumental in guiding the development of this Pathway.





# 3. Jargon-busting and achieving Carbon Net Zero

## 3.1 What is the Climate Emergency?

There is a climate emergency because our climate is warming and changing faster than nature can adapt to it. Scientists have calculated that by the middle of this century, the world has to reduce emissions to as close to zero as possible so that the earth has a chance to recover and stabilise. We therefore have to take action now.

**A climate emergency declaration, or declaring a climate emergency, is an action taken by governments and scientists to acknowledge humanity is currently heading towards climate catastrophe.**

The climate is the long-term pattern of day to day weather. Our food and water supplies depend on stable seasonal patterns of temperature, rain and wind, both in the UK and elsewhere. In the last 100 years, the earth's average temperature has increased faster than previously seen – this is known as global warming or global heating. This heating of the planet is causing our global and local climates to change and is therefore putting our ecosystems<sup>6</sup> at risk, which may no longer be able to support our current way of life, or those plants and animals that live among us. This includes the production and provision of food and water for instance.

It is clear from the Intergovernmental Panel on Climate Change (IPCC) report<sup>7</sup>, that human activity plays a significant role in this increase in temperature. Our use of fossil fuels like petrol, diesel, gas and coal is widely accepted by scientists to be the main cause of global warming. When these fuels are burned, they release greenhouse gases which trap heat in the earth's atmosphere, causing the air and seas to heat up, which in turn changes the climate. The GHG produced when we burn these fuels contain a lot of carbon and so the term 'carbon emissions' is often used when talking about tackling the climate emergency. These emissions are rising at such a rate that our climate is changing much more rapidly than earth's ecosystems and lifeforms can adapt.

We have already witnessed evidence of the climate emergency happening right now, with an increase in the prevalence of floods, droughts and fires around the world, including devastating climate events across the UK this year too. It is likely that these events will get more frequent and fierce if carbon emissions continue unchecked. Preventing this requires urgent action on a global scale.

This mitigation pathway is paving the way for Cheltenham to play its part in limiting the catastrophic impacts caused by climate change, harnessing the potential of our own residents, businesses, visitors and communities, to contribute locally to the national and global commitment required.

**You can find further information and useful links on our climate change webpages if you would like to know more: [www.cheltenham.gov.uk/climate](http://www.cheltenham.gov.uk/climate)**

<sup>6</sup> An ecosystem is where plants, animals, and other organisms, as well as weather and landscapes, work together to form a sphere of life.

<sup>7</sup> [www.ipcc.ch/report/ar6/wg1](http://www.ipcc.ch/report/ar6/wg1)



## 3.2 Climate implications for Cheltenham

At a local level, we have already started to feel the impacts of climate change. Increased flooding in the area has posed a risk to transport infrastructure, damaging our roads and causing disruption. An increase in impermeable surfaces such as concrete and tarmac, and a reduction in natural flood mitigation, for example due to land drainage schemes, has resulted in flash flooding which can impact health, wellbeing and livelihoods.

The 'Urban Heat Island' effect, where towns and cities experience higher summer temperatures than the surrounding rural areas, has been noticed in Cheltenham. Higher building density, less green infrastructure and air pollution from traffic, all increase the likelihood of heat becoming trapped or stored and lead to a disproportionate rise in local temperatures. Since the start of temperature recording, 10 of the warmest years have been since 2002 and there is a trend of increasing temperatures. Higher temperatures result in an increase in heat-related illness and death, particularly in vulnerable groups, including the elderly and very young.

As time goes on, we will notice more changes to our environment and an increase in extreme weather events. Some of these are hard to predict accurately, such as shortages of public water supply and problems with food production.

However, this mitigation pathway will consider how we can become a more closely-knit community which knows where to turn in the face of an extreme event and how we will prepare and adapt to changes that come our way.

Not only will climate mitigation and adaptation help to address the global issue, it will bring improvements in our local area. Co-benefits such as enhanced access to green spaces, job creation, improved mental and physical health, together with increased biodiversity, **will make Cheltenham a better place to live for all of us.**



### 3.3 The Jargon: What is the difference between ‘carbon-neutral’ and ‘net-zero’?

It is important that we ensure there is clarity surrounding our targets and the terminology we use. Therefore, we have outlined the difference between the various terms you may hear across the press, social media and other publications, to help with the narrative and related aspirations.

#### Greenhouse Gases (GHG)

are gases in Earth’s atmosphere that trap heat. They let sunlight pass through the atmosphere, but they prevent the heat that the sunlight brings from leaving the atmosphere. This warms and creates the ‘greenhouse effect’. The main greenhouse gases are water vapour, carbon dioxide, methane, ozone, nitrous oxide. When we measure GHG, we usually refer to them as carbon dioxide equivalents (CO2e) to allow us to easily compare their impact on global warming<sup>8</sup>.



**Carbon neutral** means that any carbon dioxide (CO2) released into the atmosphere from an organisation’s activities is balanced by an equivalent amount being removed. Typically, this would be achieved by determining the organisation’s **carbon footprint** and deciding how best to counteract these emissions via renewable energy generation or **carbon offsetting**, and sometimes carbon emissions reductions. An organisation can demonstrate carbon neutrality, whilst still increasing its own carbon emissions.



**Net-Zero emissions** means not adding any greenhouse gases to the atmosphere through an organisation’s activities. Becoming net-zero starts with a plan to rapidly reduce GHG emissions to zero by a specified date. However, most organisations find that some emissions can’t be reduced to zero. These are expected to be small and are usually then offset by initiatives aimed at removing an equivalent amount of GHG from the atmosphere. The UK became the world’s first major economy to set a target of being net zero by 2050. **Cheltenham has set a more ambitious target of being net zero by 2030.**

In October 2021, the Government stated that to reach their Net Zero target, the task is to “reduce emissions to as close to zero as possible, with the small amount of remaining emissions absorbed through natural carbon sinks like forests, and new technologies like carbon capture.”<sup>9</sup>



**Carbon footprint** is the calculated amount of CO2 released into the atmosphere as a result of the activities of a particular individual, organisation, or community.



**Carbon offsetting** is the action or process of compensating for the CO2 emissions arising from an organisation’s or individual’s activity by participating in schemes designed to make equivalent reductions of CO2 in the atmosphere. It is suggested that CO2 has the same impact on the climate no matter where it is emitted and, therefore, it is considered that a tonne of CO2 absorbed from the atmosphere in one part of the world, through carbon capture or tree planting, for example, can cancel out a tonne of CO2 emitted in another.

#### Scope 1 emissions

cover an organisation’s GHG emissions which are produced directly by their activities. This is usually through the burning of fossil fuels, whilst running gas boilers or diesel vehicles, for instance.

#### Scope 2 emissions

cover GHG emissions produced indirectly by an organisation, for example the electricity used to heat a building which has been produced by burning fossil fuels elsewhere.

#### Scope 3 emissions

include all other indirect emissions that are produced by an organisation’s activities, such as the disposal of waste, employee commuting and the supply chain.

<sup>8</sup> [ecometrica.com/assets/GHGs-CO2-CO2e-and-Carbon-What-Do-These-Mean-v2.1.pdf](https://ecometrica.com/assets/GHGs-CO2-CO2e-and-Carbon-What-Do-These-Mean-v2.1.pdf)

<sup>9</sup> [assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1028157/net-zero-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1028157/net-zero-strategy.pdf)

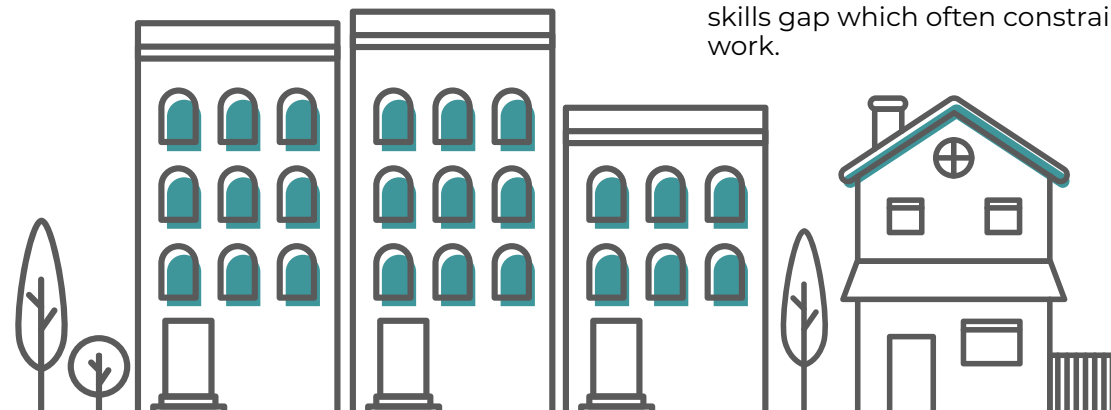
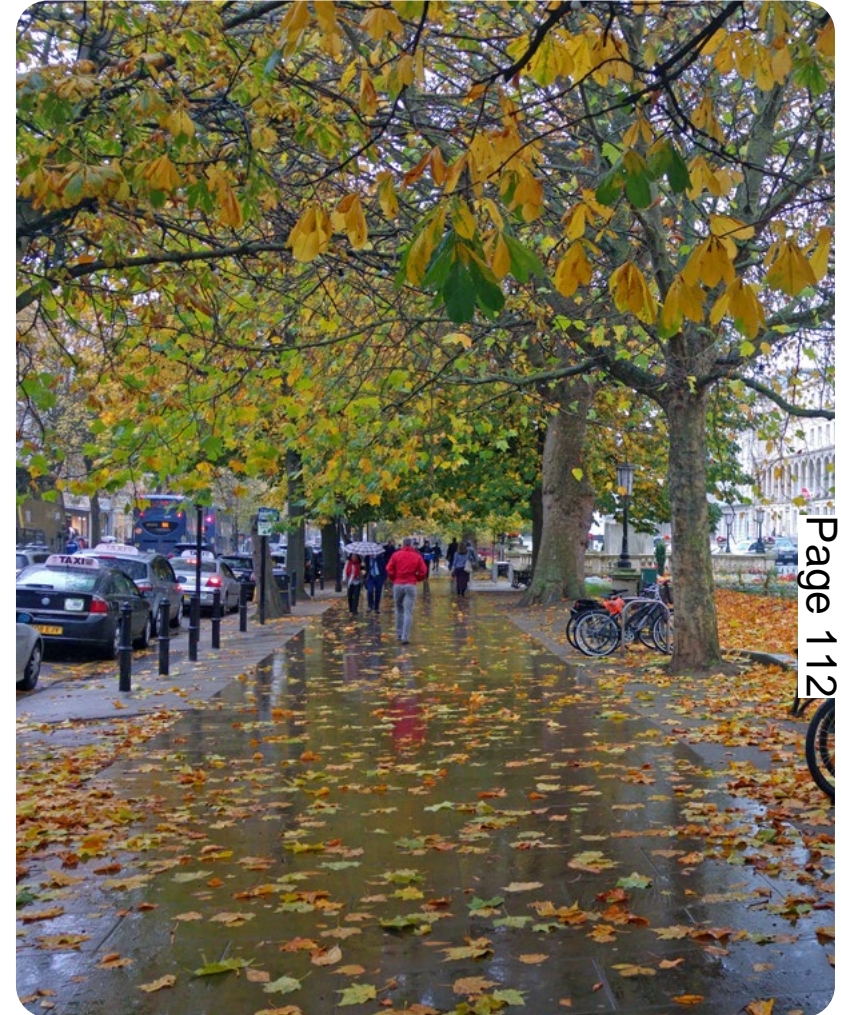


### 3.4 What do we want to achieve?

CBC has set an ambitious target to become **Net Zero** by 2030. Primarily, this involves a plan to reduce our Scope 1 and 2 emissions to almost nothing and to explore the viability of compensating for the remaining emissions through mechanisms such as carbon-offsetting. Although we will endeavour to reduce our Scope 3 emissions as much as possible, for example, by looking at how our officers travel to work and where our waste is generated and disposed of, much of our Scope 3 emissions come from those across our supply chain, from the builders we use, to the manufacturers of our office pens. This presents a significant challenge for us to reach net zero, as we will need to consider the carbon impact of our procurement activity across the board, i.e. where products come from, how they are made and what they are made of, as well as the business activities of service providers. Therefore, although we plan to tackle our Scope 3 emissions head on, we recognise that this may be a longer process than reaching net zero for our Scope 1 and 2 emissions.

As well as becoming a net zero Council, we have also committed to reach net zero carbon emissions as a Borough. This is a challenge that will require support and change from all those living and working in Cheltenham, as well as businesses, partner organisations like the County Council and LEP, and the Government.

CBC recognises its role as one which necessitates leadership, facilitation and signposting to make it easier for others to follow on the journey to net zero. We know that there are requirements for input and support from others to help us achieve our net zero ambitions. For example, to help us deliver our vision of how transport could work better in the borough, we will work with others who have the crucial statutory powers and resources, such as GCC. To align with our ambition, central Government will need to enhance legislation and funding so that the necessary policies and structures are in place for us to drive change. We must continue to motivate the construction sector to 'gear up' in order to meet the coming demands for the retrofitting of homes and commercial buildings, and support the education sector in reducing the skills gap which often constrains our work.



## 4. Carbon Footprint Calculations

### 4.1 CBC Carbon Footprint 2019-21

Table 1.0 below shows CBC's carbon footprint in tonnes of carbon dioxide equivalent (CO<sub>2</sub>e). We have striven to be as thorough as possible when calculating the carbon footprint and widened the scope in 2020/21 to include emissions from both waste and water. This means that some of the reductions in gas consumption resulting from the reduction in the use of buildings during the Covid-19 pandemic were partially mitigated. This is presented next to our base year of 2019/20 as originally calculated, and the revised base year, which was calculated using the updated approach.

|                              | 2021/22 | 2019/20 (base year) | 2019/20 (revised) |
|------------------------------|---------|---------------------|-------------------|
| <b>Scope 1</b>               | 2,954   | 3,620               | 3,650             |
| <b>Scope 2</b>               | 1,047   | 868                 | 1,279             |
| <b>Scope 3</b>               | 1,069   | 1,134               | 1,178             |
| <b>TOTAL GROSS EMISSIONS</b> | 5,070   | 5,622               | 6,106             |

### 4.2 Cheltenham Borough Carbon Footprint

Table 2.0 below shows the annual carbon footprint, in CO<sub>2</sub>e, of the Borough. These figures comprise data from various sources including from the Department for Environment, Food & Rural Affairs (DEFRA)<sup>10</sup> and the Department for Business, Energy and Industrial Strategy (BEIS)<sup>11</sup>, as well as some of our own data collection and extrapolation. The calculations include emissions from sources such as waste disposal, transport, and energy consumption in homes and businesses.

|                              | 2020    | 2019    | 2018    |
|------------------------------|---------|---------|---------|
| <b>TOTAL GROSS EMISSIONS</b> | 539,856 | 555,568 | 570,993 |

<sup>10</sup> [www.gov.uk/government/statistical-data-sets/env23-uk-waste-data-and-management](https://www.gov.uk/government/statistical-data-sets/env23-uk-waste-data-and-management)

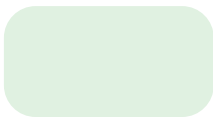
<sup>11</sup> [data.gov.uk/dataset/4b7b7f64-0b97-4a6e-8e45-1218b9a81876/sub-national-total-final-energy-consumption-data](https://data.gov.uk/dataset/4b7b7f64-0b97-4a6e-8e45-1218b9a81876/sub-national-total-final-energy-consumption-data)



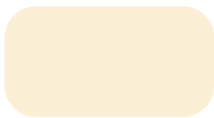
# 5. Topics

Outlined below, are 8 key areas of focus we believe are needed for us to become a net zero Council and Borough by the year 2030. The ambition for each topic is broadly covered, together with a list of the actions we will take to help reach our net zero goal. This list will remain fluid to keep up with changes in government policy, the emergence of new technologies and lessons learned through experience.

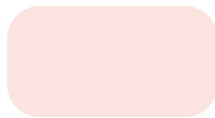
Moving forward, an annual progress report will be produced by our Climate Emergency team to monitor and evaluate our progress against the list of actions set out here.



Priority in  
2021-23



Priority in  
2024-26



Priority in  
2027-28



CBC taking a  
leading role



# A. LEADING BY EXAMPLE

## Overview

CBC strongly believes that in order to ask others to make the necessary changes to their organisations and lives, we must be seen to be leading on making these changes ourselves. By seeking to set ever higher standards, we can offer advice and share best practice to make it easier for others to follow, signposting to other leaders along the way.

## Ongoing & Completed

We are already on our way to understanding how our staff travel to and from work and will proceed by promoting lift-sharing and public transport options. We have introduced a staff cycle purchase scheme through salary sacrifice, to encourage modal shift and help reduce our commuter transport emissions. We continue to consider flexible and home-working options to reduce the emissions from commuting and building use.

In addition to this, charging points for the Mayors electric car will be installed at Swindon Road in 2022, coinciding with the arrival of the first two electric vehicles as part of the Ubico fleet, as we begin our transition away from fossil fuel consuming vehicles. In support of this, during 2022, we will be changing some of our UBICO fleet to run on Hydrotreated Vegetable Oil (HVO), a fuel with much lower carbon emissions.

In order to improve our ways of engaging with communities, we are trialling two different platforms which encourage democratic participatory processes and stakeholder involvement, one of which is under the Cheltenham Zero Partnership. We have already had many positive interactions through [haveyoursay.cheltenham.gov.uk](https://haveyoursay.cheltenham.gov.uk) and [cheltenhamzero.org](https://cheltenhamzero.org) and continue to explore ways to get the most out of these sites. These sites not only allow us to hear the views of Cheltenham residents and businesses, but also provide a platform for us to share updates and case studies from ourselves and other organisations. In this way, we hope to inspire and encourage others to join us on the journey to net zero.

## Actions

1. Report our carbon footprint annually and encourage others to follow suit. Endeavour to be more thorough and precise over time and include more of our impact year on year.



2. Commit to lobbying higher levels of government for stronger climate action and greater support to local authorities to help facilitate them making a difference.



3. Introduce compulsory 'Carbon Literacy Training' to the Council and partners and commit to 100% of the Council's officers, staff and elected members gaining a Carbon Literacy certification.



4. Develop case studies to share our experience in implementing climate initiatives, learnings and success stories, to help others learn from our actions, replicate, or ideally, do better.



5. Keep the public informed about our progress in meeting or missing our climate targets.



6. Develop, or help facilitate through the Local Resilience Forum, a strategy for locally addressing epidemics and pandemics as part of our wider climate actions.

7. Leverage our position as 'The Festival Town' to drive change through the development of a more sustainable and carbon friendly events strategy.





# B. DECISION MAKING, POLICIES, PLANS AND STRATEGIES

## Overview

We know there is a need for the climate agenda to be a strong policy thread across the council. Without climate being a focus for all our officers and members, woven through each of our departments, we will fail to embed a Net Zero culture. Thus, we will ensure all our decisions help to meet national and local net zero carbon targets, improve air quality and protect and restore nature, as well as delivering on COVID-19 recovery.

## Ongoing & Completed

The Council has been working hard since declaring a climate emergency and throughout the pandemic, to deliver action that will lead to a seismic shift in our approach to reaching net zero.

First and foremost, we have employed and committed future annual budgets for two dedicated climate emergency officers - a team we expect will need to grow to achieve our goal of becoming a net zero, climate resilient council and borough by the year 2030. This team is complemented by a new, dedicated climate emergency Cabinet Lead to drive positive change among our members and help challenge leadership and decision-making. Furthermore, we have established a core multi-disciplinary group of officers from across the Council, to help ensure climate change is not just delivered by one team, but is woven throughout the business across everything we do.

Additionally, the Council is part of the Government's Kickstart Scheme<sup>12</sup> which will allow for the 6-month hire of a Climate Action Support Officer, providing additional resource to the Climate Emergency Team in delivering the actions from this Pathway, but specifically, will employ someone claiming Universal Credit and in the 16 to 24 year old age bracket.

The creation of a 'Climate Change Programme Board' will help to keep us on the right track throughout our journey to 2030, ensuring we are focusing resource and efforts in the most important areas. The Board, led by an appropriate Cabinet Member, will consist of other political representatives and the Countywide Climate Change Coordinator, meeting on a quarterly basis to steer the programme of works stemming from this pathway.

<sup>12</sup> [www.gov.uk/government/collections/kickstart-scheme](https://www.gov.uk/government/collections/kickstart-scheme)

## Actions

1. Identify both a councillor at cabinet level and a lead officer as Climate Champions, who are required to publish an annual public report on progress against meeting the targets set out in the CEAP.



2. Issue a new climate-focused Supplementary Planning Document (SPD) that addresses the limitations within the existing Local Plan and Joint Core Strategy. This will set a new 'Cheltenham Standard' for developers and aid our planners in their decision making. The SPD may include the necessity to develop using Natural Flood Management (NFM) techniques, the requirement to achieve Biodiversity Net Gain, installing sustainable energy solutions, driving adoption of the 'Building with Nature' benchmark and the use of Passivhaus standards.



3. Introduce a tool to ensure that climate implications are adequately considered at the early stages of each project, initiative or decision. This tool should be used to develop initiatives that the lowest possible impact on the environment whilst still meeting the needs of the Council.



4. Annually review the existing and additional workforce needed to deliver the actions set out in this pathway and swiftly prioritise the decisions and investment needed to recruit the necessary capacity and expertise.



5. Align our council statutory and non-statutory plans, policies and guidance with our climate, nature and green economy goals, including corporate areas such as procurement and infrastructure development.





# C. FINANCE, FUNDING, INVESTMENT AND PROCUREMENT

## Overview

Both public and private investment is crucial to the success of reaching our targets for 2030. How we invest is fundamental to facilitating change. We cannot overestimate the power that our purchasing decisions across the borough can have on encouraging, supporting and driving the green revolution and forcing markets to change for the better. Currently, the Government's Procurement Policy Note<sup>13</sup> requires that any suppliers bidding for goods, services or works, with an estimated contract value of over £5 million, must provide a Carbon Reduction Plan confirming their commitment to achieving Net Zero by 2050. This also has to outline the environmental management measures that they have in place for the project/works. Policy such as this can incentivise climate action through the supply chain, however, we hope to be more ambitious by introducing suitable criteria for much lower contract values.

## Ongoing & Completed

CBC has developed its own Climate Investment Strategy with a view to source funds using various financing options. This investment strategy will provide a wider pool of funding to help tackle the climate emergency by supporting and activating carbon reduction projects. This strategy is expected to be published in early 2022 and will enable the council to act quicker and respond better to investment opportunities, grants and private investment projects. A Green Investment Strategy Board is to be established to evaluate and authorise decisions for investments under £500,000.

We know that working closely with our fellow districts across Gloucestershire will be an important part of our effort to reach shared carbon reduction targets. Financial contribution has therefore been made by CBC to employ a County-wide Climate Change Coordinator, a role hosted by Gloucester City Council and financed by public bodies and district Councils within Gloucestershire. This officer will help ensure that the districts and county work collaboratively, learnings are shared and economies of scale are drawn upon wherever appropriate.

We are committed to reducing our investment in oil and gas whilst understanding the continued need to balance this commitment with making the right financial decisions to safeguard our residents, businesses and communities.

<sup>13</sup> [assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/991622/PPN\\_0621\\_Taking\\_account\\_of\\_Carbon\\_Reduction\\_Plans\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991622/PPN_0621_Taking_account_of_Carbon_Reduction_Plans_2_.pdf)

## Actions

1. Develop a Climate Investment Strategy known as 'Cheltenham's Green Deal' that approves and enables money to be raised for investment in green projects, using various means such as grants, bonds, or Community Municipal Investments (CMI) to speed up carbon emission reductions and increase resilience to climate change and to support the Council's Medium Term Financial Strategy (MTFS).



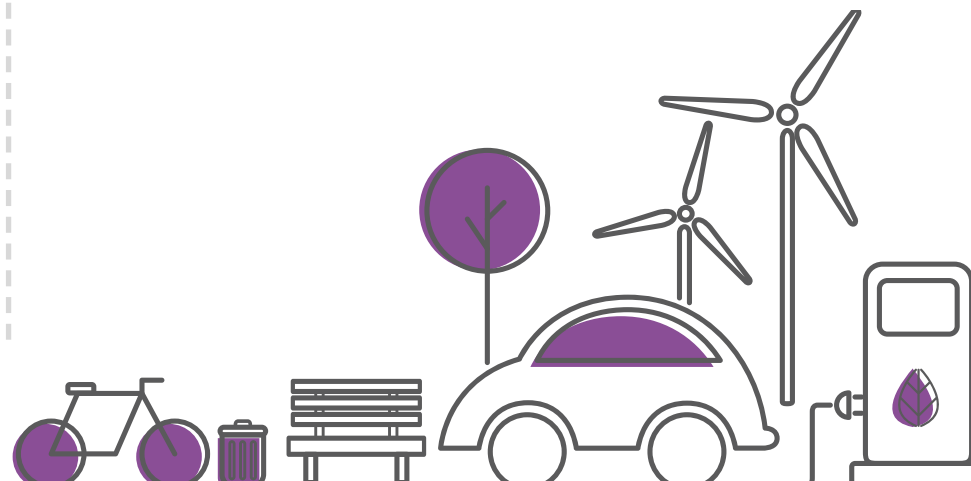
2. Introduce an annual 'Climate Community Fund' that helps to finance smaller scale, community climate initiatives and projects, which can be used as best practice exemplars to encourage the take up of similar schemes.



3. Ensure all future investment decisions take into account our climate emergency objectives. As the Council recovers from the impact from the pandemic, we will look at the earliest opportunity to review our modest investment portfolio, as part of our commitment of divestment from funds which support the burning or extraction of fossil fuels.



*Actions continue on next page*



4. Encourage suppliers to measure and report on their Scope 1 and 2 emissions, to help improve the level of detail of our Scope 3 emissions reporting, focusing first on the highest expenditure areas of repair and construction.



5. Review our Procurement Policy to ensure all purchases properly consider climate-related impacts and add greater weight to purchasing from sustainable local businesses and those which add social value.



6. Look to invest in low-carbon and climate-resilient infrastructure that reap multiple environmental benefits wherever possible. This may range from small Sustainable Urban Drainage Systems (SuDS) and rain gardens, to solar farms and green roofs.

7. Work with Gloucestershire's Local Enterprise Partnership (GFirst LEP) and other authorities and organisations to rapidly grow the green economy, by investing in economic activities that promote reduced carbon emissions and pollution, enhanced energy efficiency and prevention of the loss of biodiversity.

8. Use legal and planning mechanisms, such as Section 106 agreements, the Community Infrastructure Levy (CIL) and others to help fund climate actions and nature restoration projects.

9. While acknowledging that the County Council is the lead transport authority, explore opportunities to introduce economic nudge mechanisms to help disincentivise car use, particularly for shorter journeys. Further encourage the County Council to use such mechanisms to enable and encourage sustainable transport, particularly measures that allow people to use active and collective forms of transport to travel to work, such as segregated cycle ways and public transport.



# D. BUILDINGS & ENERGY

## Overview

Heating for homes and workspaces currently makes up almost a third of all UK carbon emissions. Excessive use of energy due to inefficiencies and sourcing from fossil fuels also contributes significantly to climate change. Improvements drastically need to be made on improving the energy efficiency of housing and non-domestic properties, ensuring they require less energy to heat, making them cheaper to run and more comfortable to live and work in, whilst reducing our dependence on imported energy. In turn, we hope to tackle fuel poverty and thereby improve the health and wellbeing of residents that struggle to cover the costs of energy, particularly during the winter months. This needs to apply to both new and existing housing stock and other types of assets that utilise energy.

## Ongoing & Completed

In spring 2021, CBC was awarded over £380k to install an integrated utility metering platform with works commencing November 2021 and an expected completion date in March 2022. The platform brings together all the available energy and water data for some of our biggest buildings, via mechanisms such as a network of sub-meters providing real time data on energy usage. The data and ensuing analysis will inform a programme of behavioural change, to target a reduction in our energy wastage in these buildings.

This project has also generated a decarbonisation plan for each of the identified buildings, such as Leisure@ and the Pittville Pump Rooms, which have considered the viability of removing gas heating and cooking elements from each building and explored the required funding and permissions necessary for the Council to proceed with such actions.

The continued strong partnership between the Council and Cheltenham Borough Homes (CBH) will be vital in ensuring an inclusive approach, ensuring that the benefits of investment and climate mitigation through retrofit activities and sustainable new developments are far reaching. Collaboration to deliver shared climate priorities is already underway between CBC and CBH.



A 'fabric-first' approach is being taken with the existing homes managed by CBH which include the Council housing stock of around 4,500 dwellings. Many of these homes are heated by GHG emitting gas boilers and improving the insulation and reviewing low carbon heating options will ensure that the homes are as energy efficient as possible. CBC and CBH have already been successful in a bid to the Social Housing Decarbonisation Fund (SHDF) for a deep retrofit scheme<sup>14</sup>. This will demonstrate the potential of our existing homes in becoming energy efficient through fabric improvements and low carbon heating. We continue to bid for future waves of these funds and, where beneficial, strengthen bids through partnerships with other local authorities.


New social housing developments in Cheltenham will seek to achieve the very highest standards of energy efficiency. CBC is working together with CBH to regenerate existing redundant sites, as part of the commitment to provide 500 affordable homes delivered or in the pipeline by 2026, made possible by £180m investment by CBC to provide quality homes and support thriving communities. The work is a direct delivery of CBC's key priority to increase the supply of housing and investment to build resilient communities and CBH's priority to provide great homes to make Cheltenham a better place to live. CBH will also strive to make the best use of land in the interests of enhancing biodiversity performance, with insightful design for long-term ecological impact. The development of 320 Swindon Road<sup>15</sup> is an early example.


<sup>14</sup> [www.gov.uk/government/publications/social-housing-decarbonisation-fund-demonstrator-successful-bids](https://www.gov.uk/government/publications/social-housing-decarbonisation-fund-demonstrator-successful-bids)

<sup>15</sup> [www.cbh.org/proposed-development-of-320-swindon-road/](https://www.cbh.org/proposed-development-of-320-swindon-road/)


## Actions

1. Measure the energy usage of CBC owned properties and develop a heating and energy efficiency strategy to set out actions needed to actively reduce energy consumption and move away from the use of fossil fuels. Introduce behaviour change programmes to reduce energy consumption in council owned buildings. Support businesses and residents to similarly reduce their consumption. 
2. Retrofit council-owned social housing, focusing first on the homes most at risk of fuel poverty.
3. Develop a new 'Sustainability Design Code' for the Golden Valley Development, as a vision for integrated living in West Cheltenham that promotes a low carbon lifestyle. Our aspiration is for this thinking to then be replicated across the town, or within other districts and regions.
4. Explore the viability of a shared low-carbon heat network, to help reduce borough-wide emissions.
5. Retrofit council-owned properties with sustainable, energy-efficient solutions where feasible. 
6. Help owner-occupiers to create more energy efficient homes. For example, by supporting energy companies to provide fuel-poor or vulnerable households with insulation, or by helping influence the retrofit market to ensure there is effective demand for energy efficient measures by those that are classified as "able to pay". This may include supporting the provision of skills-training for local workers, actively encouraging applications for new installations, and facilitating the applications of funding bids from home owners.

7. Seek to invest in renewable energy generation by identifying suitable areas in the future Planning Policy documents, such as the Cheltenham Plan and Joint Core Strategy. Review the feasibility of alternative energy sources, new technologies and innovations and the potential to be a net contributor. 

8. Commit to using 100% renewable electricity across council owned assets, including those operated by key partners. Support businesses and residents to do the same. Encourage developers to commit to renewable energy by stipulating requirements in a new Supplementary Planning Document (SPD) 

9. Engage with landlords to improve energy efficiency of homes in the private rented sector and commercial properties and encourage them to achieve good insulation.

10. Look for potential to align Conservation Area policies with climate emergency goals. 





# E. ACTIVE TRAVEL, TRANSPORT AND AIR QUALITY

## Overview

An estimated 70% of car journeys within Cheltenham are under 2km; many of these journeys could be made on foot or by bicycle. A modal shift to more active transport is needed to reduce emissions from privately owned vehicles. For those unable to make these journeys without a vehicle, public transport needs to become a more attractive option and fossil fuel consuming cars need to be phased out as soon as possible. The Government has already started this journey by committing to ban the sale of new petrol and diesel cars and vans by 2030<sup>16</sup>. Policies such as this will lead to reduced carbon emissions, a reduced number of petrol and diesel cars on the road, and will help to improve Cheltenham's air quality.

## Ongoing & Completed

Whilst we are not the Highways Authority and therefore have limited control over this element of the pathway, CBC has a vision for how transport could work better in the borough. To deliver this vision, we must work with others who have the statutory powers and resources to help us.

In 2019, we published our Connecting Cheltenham<sup>17</sup> report, to seek to influence GCC's new Local Transport Plan, as well as articulating a clear aspiration of how Cheltenham wanted and needed to change.

Positive engagement has progressed with partners to look to develop a cycle hub in the heart of Cheltenham with secure, covered cycle parking, which is also suitable for cargo bikes. We hope this project will start taking shape in the first quarter of 2022, along with proposals for additional cycle parking provision across the town more widely.

Plans are underway to extend the Honeybourne Line beyond its current boundary at the underpass of the Queens Road Bridge, Lansdown towards the Lansdown Bridge. Developed by Great Western Railway and maintained by CBC, this key link to the existing Honeybourne Line will provide Cheltenham residents and our local communities with a much better connection between three key sustainable transport networks: the train station, the Cheltenham to Gloucester 94 bus network, and the Honeybourne cycle and pedestrian network into the heart of the town. This seemingly small link will play a big role in supporting CBC's climate agenda, promoting modal shift and public transport, reducing pollution and car use, and encouraging walking and cycling which leads to healthier and happier communities.

CBC is required to produce an Air Quality Action Plan (AQAP), relating to an Air Quality Management Area (AQMA) declared around an area of High Street / Poole Way in 2020. This document is likely to be completed and submitted to DEFRA in early 2022. Our formal AQAP will be published as part of a town-wide strategy for improving air quality, backed by existing policies drawn from other documents.

To reduce the carbon footprint of our own CBC fleet, we are in the process of transitioning our heavy goods vehicles used for environmental services away from fossil fuels to Hydrotreated Vegetable Oil (HVO), a fuel with much lower carbon emissions.

<sup>16</sup> [assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005301/transitioning-to-zero-emission-cars-vans-2035-delivery-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005301/transitioning-to-zero-emission-cars-vans-2035-delivery-plan.pdf)

<sup>17</sup> [www.cheltenham.gov.uk/info/61/climate\\_and\\_sustainability/1649/connecting\\_cheltenham](https://www.cheltenham.gov.uk/info/61/climate_and_sustainability/1649/connecting_cheltenham)

## Actions

1. Work with GCC to prioritise transport investment in cycling and walking, with a priority of installing segregated cycleways, increasing space for pedestrians and introducing a 20mph speed limit in urban areas. Seek to safeguard routes for a future mass transport system to enhance and improve the sustainability of Cheltenham's public transport offering.

2. Introduce new 'safe cycle hubs' across the town, working with businesses to help facilitate these, as well as installing more cycle racks, wherever it is suitable and safe to do so.



3. Enable a shift to electric vehicles by installing electric vehicle charging points within Council owned car parks and support GCC with the delivery of their Local Transport Plan (LTP).



4. Deliver a policy that will require all taxis to be electric, or another form of zero carbon as technology evolves, and support the provision of required infrastructure.



5. Transition the council's own fleet to electric vehicles. Explore interim measures such as the use of Hydrotreated Vegetable Oil (HVO) fuel in place of traditional diesel in instances where electrification is not yet a viable option, particularly for the Council's heavy goods vehicles delivering environmental services across the borough.



6. Reduce the use of private vehicles used for commuting by council officers through a reinvigorated green staff travel strategy, including progressive flexible and home-working options.



7. Reduce car use through measures available to the Borough such as promoting car-sharing schemes, supporting the continuation of the county e-scooter trial, introducing staff incentive schemes such as 'Cycle to Work' and reducing or removing direct car parking benefits.

8. Work with GCC to develop and implement a "last mile" strategy that encourages greener deliveries across the area by setting up an area-wide distribution centre. This will help remove large delivery vehicles from the central road network and facilitate the introduction of efficient cargo bikes to Cheltenham, whilst creating new jobs and economic growth.

9. Review our existing car parking strategy. We will continue to explore ways to ensure alternative travel options to car use are viable and seen to be more favourable than driving. Town centre parking charges will need to reflect this policy choice. Repurposing some car parking spaces (i.e. by creating urban gardens or for car share schemes) will be necessary to demonstrate the council's ambition to remove priority for privately-owned vehicles and to amplify services and support for active travellers.



10. Reduce the need to own and use a car by requiring that the location and design of new developments means they are demonstrably accessible by safe cycling, walking routes and good quality public transport and situated close to essential services.

11. Explore the feasibility of introducing Clean Air Zones within Cheltenham town centre, similar to schemes recently introduced in other areas such as Bath and Birmingham.



# F. NATURAL ENVIRONMENT AND BIODIVERSITY

## Overview

We are not only experiencing a climate emergency, but an ecological emergency too. Our wildlife, biodiversity and ecosystems are at just as much a risk of catastrophe as we are as human beings if action is not taken to protect our natural environment and halt climate change. We must acknowledge our planetary boundaries. Planting more trees, protecting and extending wild spaces for nature, increasing biodiversity, restoring our land to sequester carbon and building our resilience to flooding, will all contribute to mitigating the climate emergency.

## Ongoing & Completed

Over the last year, CBC has planted 1,200 trees across our parks, gardens and other land-based assets. We'll be looking to work closely with GCC as they undertake their new tree planting programme<sup>18</sup> in association with the Woodland Trust, whilst looking to produce a robust tree planting strategy of our own.

We continue to protect our existing green spaces and locally designated nature sites and endeavour to ensure public access to local authority-owned green spaces.

In March 2021, CBC resolved to support the Climate and Ecological Emergency Bill which aims to 'to actively restore biodiverse habitats, and to stop damaging our natural world through the production, transportation and disposal of the goods we consume'<sup>19</sup>. Moreover, new legally binding environmental targets are to be set and enforced as part of the Environment Act which became UK law in 2021<sup>20</sup>. This legislation will protect and enhance our environment for future generations and aims to halt the decline in species by restoring natural habitats.



<sup>18</sup> <https://www.gloucestershire.gov.uk/gloucestershire-county-council-news/news-september-2021/open-call-for-land-trees-need-you/>

<sup>19</sup> <https://www.cebills.uk/>

<sup>20</sup> <https://bills.parliament.uk/bills/2593/publications>

<sup>21</sup> <https://naturalcapital.gcerdata.com/>

## Actions

1. Update local planning strategies and work closely with other authorities, including GCC, to significantly increase tree cover across the borough and ensure existing trees are properly protected, in order to store carbon, support nature, aid flood protection and deliver health and wellbeing benefits. Increased canopy cover can also provide shade for people and buildings, cooling the air and ground temperatures in extreme heat. 
2. Manage council-owned land to increase biodiversity and reduce carbon pollution, i.e. through reduced pesticide use and mowing and increased planting of wildflowers and perennials. 
3. Focus on nature-based solutions for climate mitigation and adaptation. For example, work with a range of partners to develop opportunities for Natural Flood Management (NFM) schemes across the borough to help mitigate flooding and adapt to climate change, using nature to hold and slow water run-off.
4. Seek to actively restore and expand ecosystems in line with the Environment Act 2021, with a focus on enhancing biodiversity and natural carbon sinks. This could be through market based mechanisms that improve and safeguard our natural environment, for example the development of a habitat bank for biodiversity net gain credits.
5. Work with the Gloucestershire Local Nature Partnership and their Natural Capital Mapping<sup>21</sup> project to help identify nature and ecosystem restoration opportunities across Cheltenham, to reverse and restore habitats, support species and promote ecosystem quality and function.
6. Encourage and influence the uptake of green roofs on roof-tops with green roof potential to help support urban greening in the community.
7. Identify demand for allotments with a view to increasing allotment utilisation and developing land for community spaces and provide opportunities for those that may not have access to their own garden.

# G. WATER AND WASTE

## Overview






Water is often a forgotten limited resource in the UK, with easy access via our taps for a seemingly endless supply as and when we need it. However, climate change affects water management in multiple ways, ranging from changes in rainfall and therefore seasonal and annual patterns of floods and droughts which can affect water quality and availability. This can have related impacts on our health, economic activities and on freshwater dependent ecosystems. Discarded plastic and other pollutants, along with an over-use of herbicides and pesticides, are also damaging us and the environment and reducing biodiversity across land and sea. The Environment Act 2021<sup>22</sup> will drive new business behaviour for waste and recycling, and CBC will continue to work with the business community as well as residents to make sure that we move towards a circular economy, improve resource efficiency through measurement and ensure that the Act is translated into action.

## Ongoing & Completed

A new 'pocket forest' of 300 trees will be created thanks to a new coffee pod recycling service. The pioneering 'Podback'<sup>23</sup> scheme has resulted in the kerbside collection of nearly 1 million coffee pods.

While we continue to raise recycling rates, which are up 52.05% at the end of 2020/21, we will also seek to promote the reduction of waste being produced. Waste is no longer sent to landfill, and goes to Gloucestershire County Council's Javelin Park Energy from Waste facility<sup>24</sup>. This facility produces electricity, but does produce emissions. Our successful behaviour change campaigns aim to educate and raise awareness, ultimately diverting resources from the waste stream into the recycling stream.

## Actions

1. Continue to work with communities and businesses to promote food waste reduction, local food sourcing, sharing of unwanted good to eat food within the community. Continue to promote home composting and sustainable food waste.
2. Promote community sharing and reuse to reduce waste and unnecessary consumption, including water.
3. Develop an incentive strategy for all staff, including our partners, to help drive down energy consumption and waste across our buildings. 
4. Reduce the use of single-use plastic in council offices and premises and work with local businesses to help influence reduction in their plastic use and waste. 
5. Encourage businesses and other organisations within the borough to seek waste and recycling solutions which send zero waste to landfill.
6. Following the new requirements set out within the Environment Act 2021, ensure adequate recycling and food waste facilities are provided across all Council-owned and operated buildings and community centres. Support small businesses to recycle, as well as seeking to expand the 'on the go' recycling bin provision across our public realm. 
7. Reduce water consumption at CBC owned sites. 
8. Leverage the new climate-focussed Supplementary Planning Document to encourage the provision of better waste and recycling facilities in developments. Continue to look to the future for innovative ways of dealing with our waste collections such as underground bins to maximise land use and provide more opportunities for biodiversity.
9. Adopt circular-economy waste policies in relevant plans and contracts. 
10. Work with Gloucestershire County Council and other partners to increase the uptake of water butts and grey water recycling in new and existing homes and non-domestic properties as well as continue to promote sustainable food waste disposal across the county as part of Gloucestershire County Council's contract arrangement for anaerobic digestion.

<sup>22</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>23</sup> <https://www.podback.org>

<sup>24</sup> <https://www.ubbglooucestershire.co.uk>



# H. COLLECTIVE ACTION - INFLUENCING, ENGAGING, CAMPAIGNING AND BEHAVIOUR CHANGE

## Overview

Addressing the climate emergency goes beyond simply reducing our GHG emissions and the council knows it cannot achieve the 2030 target alone. We need a tight-knit community that can adapt to coming changes and knows where to turn in the face of a crisis. By working in partnership with organisations and residents across the borough, we can have greater power to influence others and bring about the necessary behaviour change and action needed to achieve our collective global goal.

## Ongoing & Completed

In recognition of the need for cross sector and district working to tackle the climate emergency, we have joined the new 'Climate Leadership Gloucestershire' group. Working with other districts in the county to share best practice and learning whilst endeavouring to solve the most challenging of climate actions. The group will work to increase our available spaces for nature, reduce CO2 and ensure a strong focus on improving the health and wellbeing of Gloucestershire's residents.

The council has established the "CheltenhamZero" partnership<sup>25</sup> with the borough's leading climate change charity, Vision 21. As an active partner, Vision21 will lead our campaign to reach out to communities and businesses, supporting them to make the transition to net zero and tackle the climate emergency collectively. As a precursor to the partnership, we launched a CheltenhamZero 'Climate Community Fund' offering grants totalling above £50k to community groups, to enable meaningful carbon reduction and climate action initiatives that can be used to showcase best practice to others.

Positive interactions with higher education institutions, has already resulted in collaborative work across numerous departments of the council, including Green Space and Climate Emergency teams. We recently secured funding as part of the Local Government Association's 'NetZero Innovation Programme', to deliver a project in partnership with the University of Gloucestershire and continue to utilise their expertise where we can.

## Actions

1. Drive the wider adoption of the CheltenhamZero Partnership across businesses, communities and residents, influencing behaviour change, collaboration and the sharing information and best practice.
2. Establish 'Climate Champions' among our communities, schools and businesses – building capacity for local people to be involved in helping meet our climate targets, inspiring communities and enterprises to find and implement solutions. Climate Champions will also be established within CBC and our key partner organisations to drive change from within.
3. Through mechanisms such as the CheltenhamZero Partnership, provide support to small and medium-sized enterprises, working closely with partners such as GFirst LEP, access funds and expertise, so that they are able to contribute to carbon reduction and nature restoration plans.



*Actions continue on next page*



4. Explore partnership opportunities for setting up 'zero carbon hubs' – decentralised futureproof centres promoting zero emission lifestyles, that help to educate, inform and advise on 'all things climate' for individuals and communities. We continue to support the Planet Cheltenham<sup>26</sup> initiative in their fight against climate change and social inequality.

5. Regularly update the council's web content<sup>27</sup> to ensure the most relevant and up to date information is available to the public.



6. Create or signpost to toolkits available for businesses, community groups, individuals and families, relating to topics such as energy, transport, waste reduction and children's climate education activities.

7. Work closely with the University of Gloucestershire to help support local climate-based research, which not only helps to identify opportunities for the Council and the Borough, but also develops the skills needed for our future workforce, enhancing student experience and employability.

8. Use influence with others, such as schools and other private businesses and organisations, to help ensure their buildings are zero-carbon, purchasing is green and the environment they supports nature wherever possible.

9. Work with businesses to seek to introduce local incentive schemes that may help influence visitor and resident behaviour change towards more sustainable lifestyles, such as walking and cycling, reduced waste and healthier eating.



<sup>26</sup> [planetcheltenham.org](https://planetcheltenham.org)

<sup>27</sup> [www.cheltenham.gov.uk/climate](https://www.cheltenham.gov.uk/climate)

## 6. Monitoring Progress

For Cheltenham to become net zero and climate resilient, and to leverage maximum impact from those around us, this mitigation pathway should provide a roadmap for our town and for those with similar ambitions to follow. We know that it isn't perfect and it will need to be adapted and improved as we learn. This overarching strategy is designed to be flexible and will be reviewed as the national context and technology evolve. We commit to being reflective, innovative and transparent on the journey to 2030 and beyond.

There is a need for us to develop a stringent monitoring process and the creation of a 'Climate Change Programme Board' will help to build this rigour. The Board, led by an appropriate Cabinet Member, will consist of other political representatives and the Countywide Climate Change Coordinator, meeting on a quarterly basis to steer the programme of works stemming from this pathway.

We have a baseline to start from and improve upon and will continue to monitor and report on progress. Continuously reviewing and revising this pathway and our delivery plans will enable us to be agile and increase co-benefits.

This CEAP will be reviewed and reported against on an annual basis to inform of our progress in relation to both climate mitigation and adaptation. These reports will be made publicly available. Internally, the monitoring of projects and initiatives will be reflected on 'Clearview', an internal strategy and performance system. We will look to take the annual review of the CEAP to the CBC Overview and Scrutiny committee once a year. The scrutiny committee looks at any issues affecting local people and makes recommendations based on evidence, therefore the annual review of the Pathway and the emerging actions will be of particular interest to the committee. Alongside this, we will improve our carbon footprinting, so that our calculations become more thorough and our reporting more transparent.

**As the year 2030 comes nearer, we will continue to ramp up our climate action efforts and strive to create a place where community, culture, business and environment thrive.**

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# CHEL TENHAM

## BOROUGH COUNCIL



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