

Cheltenham Borough Council Overview & Scrutiny Committee

Meeting date: 25 November 2024

Meeting time: 6.00 pm

Meeting venue: Council Chamber - Municipal Offices

Membership:

Councillor Tabi Joy (Chair), Councillor Jackie Chelin (Vice-Chair), Councillor Graham Beale, Councillor Julia Chandler, Councillor Stan Smith, Councillor Chris Day, Councillor Richard Pineger, Councillor Juan Carlos Garcia Clamp, Councillor Sandra Holliday, Councillor Frank Allen and Councillor Paul Baker

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Phone: 01242 264 246

1 Apologies

2 Declarations of interest

3 Minutes of the last meeting (Pages 5 - 12)

Minutes of the meeting held on 21st October 2024.

4 Public and Member questions, calls for actions and petitions

5 Cabinet Briefing

Briefing from Councillor Hay, Leader (if she has an update, or if O&S Members have questions for her)

Objective: An update from the Cabinet on key issues for Cabinet Members which may be of interest to Overview and Scrutiny and may inform the work plan

6 Air Quality Update (Pages 13 - 24)

18:15 30 mins

Objective : Exploration of air quality in Cheltenham, including national context, measurements, actions to address them, and future actions. Impact of role of Air Quality Education Post and feedback from DEFRA on annual report.

Gareth Jones, Senior Environmental Health Officer and Hannah Leatherland, Air Quality Education Projects Officer

7 Understanding Barriers to Affordable Housing Delivery (Pages 25 - 36) 18:45 30 mins

Objective: Understanding performance, current trajectory, challenges to housing enabling including through the planning process and opportunities to delivery. Reflecting on 'best practice'

Tracey Birkinshaw, Director of Communities and Economic Development and Martin Stacey, Housing Strategy and Partnerships Manager and Ewan Wright, Senior Housing Strategy and Engagement Officer.

8 Draft Overview and Scrutiny Annual Report 2023-2024 (Pages 37 - 50) 19:15 10 mins

Objective : To consider the draft Annual Scrutiny report 2023-2024 prior to submission to Council on 16 December 2024

Cllr Tabi Joy, Chair of Overview and Scrutiny

9 Feedback from other scrutiny meetings attended (Pages 51 - 54)

Gloucestershire Health O&S Committee –

<https://glostext.gloucestershire.gov.uk/mgCommitteeDetails.aspx?ID=772> please see attached report from Cllr Bamford with regard to the 15th October meeting.

No update from Gloucestershire Economic Strategy Scrutiny Committee <https://glostext.gloucestershire.gov.uk/mgCommitteeDetails.aspx?ID=892> as the next meeting is 28/11/24

Gloucestershire Police and Crime Panel
[1/11/24https://glostext.gloucestershire.gov.uk/mgCommitteeDetails.aspx?ID=650](https://glostext.gloucestershire.gov.uk/mgCommitteeDetails.aspx?ID=650) – update from Councillor Atherstone to follow.

10 Review of scrutiny workplan (Pages 55 - 56)

11 Any other item that the Chair determines to be urgent

12 Date of next meeting

The next meeting will be on 13th January 2025.

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Cheltenham Borough Council Overview & Scrutiny Committee Minutes

Meeting date: 21 October 2024

Meeting time: 6.00 pm - 7.30 pm

In attendance:

Councillors:

Tabi Joy (Chair), Jackie Chelin (Vice-Chair), Graham Beale, Stan Smith, Chris Day, Richard Pineger, Juan Carlos Garcia Clamp, Sandra Holliday, Frank Allen, Cathal Lynch, Mike Collins and Peter Jeffries

Also in attendance:

1 Apologies

Apologies were received from Cllrs Chandler and Allen.

2 Declarations of interest

Cllr Pineger stated that at agenda item * his wife was mentioned in the report.

3 Minutes of the last meeting

The minutes of the meeting held on the 9th September 2024 were signed as a true record.

4 Public and Member questions, calls for actions and petitions

There were none.

5 Cabinet Briefing

In the absence of the Leader who was attending the LGA conference, the Deputy Leader addressed the committee.

He reported that the Leader and the Chair of Overview and Scrutiny had been approached to attend a scrutiny meeting with Gloucester City Council with regard to the sale of Gloucestershire Airport. It was thought that as it was jointly owned, it would be better to have a joint scrutiny committee.

The Chair then commented as a point of clarity that she had been approached by Gloucester City Council for a joint scrutiny committee. The sale of the airport is a sensitive area and the two sets of objectives need to be considered. This is a sensitive area and there are lots of economic opportunities. The Council needs to ensure that they are as responsible as possible. She was hopeful that there will be a meeting before Christmas.

The responses to Member questions were as follows:

- The joint scrutiny committee concerns the sale of the airport.
- The sale has always been happening as far as Cheltenham have been concerned.
- The airport is currently not on the market.
- There has been political change at Gloucester City Council post elections which has complicated the issue.
- There are questions at the moment about how the committee will work and what it will look like.
- The Council and GCC are both shareholders of the airport and the matter should be looked at as one piece of work.

6 Matters referred to committee

There were none.

7 Biodiversity Duty First Consideration Report

The Director of Planning introduced the report and stated that the team had been working on the report before the Overview and Scrutiny invite. Javier (Planning Policy Officer) and Malcolm (Community Parks Development Officer) have done a huge amount of work in preparing the report by gathering information on biodiversity-related actions across the Council. They hope that it's a comprehensive report. Javier and Malcolm wanted to set out the context for the committee.

Javier and Malcolm made the following points:

- The definition of the biodiversity duty is in page 3 of the report, we have a duty to conserve biodiversity, which was strengthened with the Environment Act 2021, now we have a duty to conserve and enhance it, specified in three obligations: Consider what we can do to conserve and enhance biodiversity; Agree policies and specific objectives based on our consideration; and Act to deliver our policies and achieve our objectives.
- This 'first consideration' report is the baseline, thus in practice report 'zero', with the first full report on our biodiversity duty to be completed before January 2026.

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- The report at the committee has many actions, for instance, the partnerships with community groups are mentioned on pages 17 and 18.
- Local nature recovery strategy is being delivered by the Gloucestershire County Council either at the end of October or the beginning of November. This will form the cornerstone for our further biodiversity actions.
- Cabinet have brought things forward regarding the Cotswold Beechwoods, to progress in the form of an emerging Action Plan based on its Mitigation Strategy.
- About green space, it was explained that the Council works with partners and volunteer groups to protect and enhance biodiversity.
- There are already a lot of things being done with regards to biodiversity within the council – the Long Garden planting is going to be an annual scheme to improve biodiversity.
- Best practice for grass mowing is being looked at.
- The Council is currently looking at producing leaflets and documentation for staff, volunteers, and members of the public to educate people with regards to biodiversity.

The Chair then thanked the speakers and asked Members if they had any questions. Cllr Chelin confirmed that she had no other questions other than the ones that had already had a response published.

Members then spoke and made the following points:

- There could have been some sort of vision statement included in the report.
- There also could have been more expansion on the volunteer group, there are 18 groups across the parks and rivers.
- In terms of biodiversity the biggest problem is food and diet and there is nothing in the report refers to that.
- There could be a mention to Local Green Space and their process.

The responses to Member questions were as follows:

- With regard to the lease of the land at Milton Avenue and when that lease is up – the Green Space Officer offered to take that as an action as he didn't have the answer to hand.
- The Council is reviewing its health and safety policies so that may assist with supporting volunteers.
- Javier explained that within the process of the emerging Strategic and Local Plan there is the opportunity to look at new Local Green Spaces designation. It is important to the process that every space is assessed and supported by evidence using the criteria within the planning guidelines, such as wildlife richness, recreational activities, and community value.
- Malcolm explained that we are planting native and non-native trees to encourage biodiversity. Native trees are definitely given the priority, but non-native planting (trees from Europe) is being carried out as we are getting hotter weather here.

The Cabinet Member then addressed the committee and thanked the team for their report and stated that the team are passionate about what they do. The report is not a finished article, and any comments or contributions were welcome. He also stated that nothing is done by community groups without the permission of the team.

The Chair thanked everyone for taking part and added that Cllr Allen could not attend the meeting and thus she read some questions from him, the responses from officers were as follows:

- There is an Ash dieback management plan – the link has since been provided by the Director of Community and Economic Development and is here: <https://democracy.cheltenham.gov.uk/ieDecisionDetails.aspx?ID=3207>
- Information can also be found on the trees section of the councils website under the [Tree Protocol](#) and [Ash dieback management plan](#). Further information on how to spot ash dieback can be found [here](#).
- There are elements of Ash in lots of areas in the town, but Ash dieback is not as bad as it could have been. There is a plan relating to it and there is a budget – no more funds are needed at the moment.
- Nature recovery SPD is in the corporate plan and they are working on a brief from that piece of work, they are holding back on that at the moment to ensure that it is dealt with in the correct way to avoid duplication with other nature-related pieces of work, such as the emerging Gloucestershire Local Nature Recovery Strategy.

The item concluded with the chair stating that this was no decision needed but if anyone had any feedback that would be helpful.

8 Grants Policy

The Director of Governance and Customer Service introduced the Grants Policy and made the following points:

- As a Council we are proud of our community grants funding.
- We are trusted with public funds and need to make sure that we can account for its spending
- The policy makes sure that we will have a robust governance structure in place.
- There will be a grant tool kit which will show at an operational level what needs to be done and when, providing examples and templates.
- Moving forward there will be a bigger piece of work that looks at what we do with grants in the future.
- In the future there will be a more panel based decision group to look at how the money is distributed.
- The policy will be going to Cabinet for approval at the end of November.

Councillor Chelin had no further questions to add other than the published questions that were submitted prior to the meeting.

The responses to Member questions were as follows:

- There was clarification that some grants are from the Councils resources.
- The Council has a community grant pot of £30,000, plus annual grants that are allocated.
- There is a potential for the Council to be exposed to risk and the policy is being bought in to provide relevant protections.
- This policy is being bought in with consultation from internal audit and the counter fraud team.
- It was confirmed that if a volunteer group has not got a bank account and they are given a grant the Council could potentially hold the money for them.
- The Council is oversubscribed with people applying for its community pride grants.
- There are not independent members of the public on the panel but we try to represent everyone, for example some from the voluntary sector is often asked to assist.
- The point was made that we don't want grants to be seen as method to long term sustainability.

The Chair concluded the item stating that there was no decision to be made and encouraging Members to feedback any suggestions.

9 Scrutiny Task Group Tackling Multiple Deprivation - Progress report

The Head of Communities, Wellbeing and Partnerships introduced the report and apologised for the length of the training.

He addressed the committee and made the following points:

- It is timely to review where we are with the report as it last went to the Overview and Scrutiny committee 15 months ago in June 2023.
- The cost of living is still an issue for many residents, assistance that was set up for people during Covid is still being used by people.
- Health data points to a 10 year life gap between less and more well off communities.
- No Child left behind commissioned a piece of work and the results show that children in certain parts of the town are living in poverty.
- There was also findings that showed that young people are concerned with safety in the town. There is also much concern from both parents and young people with regard to online safety.
- Housing colleagues are working really hard to help people with their benefits, and there are good working relationships with the teams especially now that housing has been brought back into CBC
- The report brings to life what we do in partnership with other organisations and the work that we do around health.
- No Child Left Behind brings lots of partners together who have a focus on child poverty – and NCLB can create innovative solutions to how we address the challenges of child poverty.

Members then made the following points:

- One of the important things is keeping the conversation going with the Cabinet.
- The report is very informative – the member highlighted the data from Citizens Advice that , with regards to how many families are living with a negative household budget.
- It was noted that as an authority we award 100% off Council Tax for those who need it.
- Cheltenham has a reputation of being a wealthy town and this is just not the case.
- There is a responsibility of the Council to carry on coordinating the work of the different partners who have an interest in supporting people in our communities
- Whilst the report sets out the availability of data to monitor the situation with regard to deprivation, there is a need to evaluate the impact of different interventions to understand what works best but this can be expensive.

The responses to Member questions were as follows:

- The rise of home schooling and young people being taken out of education is an issue as they can then drop off the radar as far as Gloucestershire County Council are concerned and potentially end up a statistic.
- The strategy in how to respond to the issues of deprivation going forward lies with the Cabinet.
- With regards to schools exclusion and suspensions, there has been an uptick in the numbers absent from school post pandemic. there .
- As an action the chair requested that there was more information provided to the committee with regards to school attendance and another Member requested that the information be split between primary and secondary schools.

10 Feedback from other scrutiny meetings attended

The reports were noted for information.

11 Updates from scrutiny task groups

There are currently no scrutiny task groups.

12 Review of scrutiny workplan

There was nothing further to add, although the Chair stated that there is always an option to put something forward to go on the plan.

13 Any other item that the Chair determines to be urgent

There were none.

14 Date of next meeting

The date of the next meeting is 25th November 2024.

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Information/Discussion Paper

Overview and Scrutiny – 25th November 2024

Air Quality Update

This note contains the information to keep Members informed of matters relating to the work of the Committee, but where no decisions from Members are needed.

1. Why has this come to scrutiny?

- 1.1 The Environment Act 2021 strengthened the local authority air quality management framework to enable greater local action on air pollution. We continue to appraise air quality with the main emphasis on the pollutants which are most relevant to Cheltenham and most challenging in respect of compliance, the primary pollutants, namely nitrogen dioxide (NO₂) and particulate matter (PM)
- 1.2 This paper explores air quality in Cheltenham, including the national context, how we measure pollutants and actions we are taking and intend to take to address pollutant levels. We have also provided additional information on the work of our Air Quality Education Officer.
- 1.3 We also wish to draw to members attention the Department of Environment and Rural Affairs (DEFRA) appraisal of our Annual Status report (ASR) 2024.

2. Summary of the Issue

- 2.1 Our ASR was approved for publication in August 2024. Positive statements from the report include:
 - The Council have continued to provide clear evidence of several key actions to improve air quality which have been completed during the current reporting year.
 - The Council have clearly listed their priorities for the coming year. This is commended and is indicative of good practice.
 - The Council have provided excellent mapping of all monitoring locations within the Borough and included air quality management area (AQMA) boundaries, which is commended.
 - The council have provided extensive trend graphs and analysis for all monitoring data, which is welcomed.
 - An additional passive diffusion tube monitoring location was commissioned in 2023, as well as a new monitoring station on Gloucester Road to monitor PM₁₀ and PM_{2.5} concentrations. This is welcomed.

The report is now available through the council website, or via DEFRA. Despite the regulatory compliance and high levels of monitoring being carried out, there is further action required to maintain progress and improve levels of air pollution.

2.2 In broad terms levels of nitrogen dioxide, chiefly from vehicle exhausts continues to fall slowly but steadily. Monitoring results for this pollutant are expected to show that the entire borough will fall within legal limits again this year, for the third year running. This continued compliance will make the need for a declared Air Quality Management Area (AQMA) and the resultant Air Quality Action Plan (AQAP) obsolete.

2.3 Activity in the UK around air quality is becoming increasingly focussed on levels of airborne fine particulate matter, known as PM2.5. This pollutant is derived from a wider range of sources than just road traffic, and action to reduce levels of PM2.5 need to address this variety of sources, especially domestic combustion of solid fuels.

3. Summary of evidence/information

3.1 Concerns about air quality are frequently confused or combined with those about climate change or global heating. The following table identifies (in brief) some key similarities and differences between the two topics:

	AQ	Climate / Global Heating
Main pollutants of concern	NO2, PM2.5, PM10	Carbon dioxide, methane, nitrous oxide, Fluorinated greenhouse gases (F-gases), water vapour
Sources / causes	NO2 – Road traffic (Industry) PMs – Traffic (inc. electric), domestic combustion, agriculture, distant natural sources.	Fossil fuel use in electricity generation, transport, industry, and domestic heating. Other industrial sources, including landfill. Agriculture processes, deforestation and also from some natural processes.
Effect	Direct links to increase in: <ul style="list-style-type: none"> • Heart disease • Stroke • Asthma (NO2) • Lung Cancer • Dementia • Diabetes • Slower learning 	Global temperature rise. Rise in sea level Reduced bio-diversity Increase in extreme weather events. Changing cropping patterns.
Victims	Local. Young people. Sensitized & sick (generally	Global Poor countries worst affected.

	elderly). Disadvantaged communities.	
Actions	Reduced fossil fuel use in transport. Reduce domestic solid fuel use. Reduce cumulative effect of multiple sources: building site dust, industry, agricultural fertilisers.	Reduced fossil fuel use in transport. “Clean” energy sources. Sustainable sourcing to reduce demands producing deforestation.

3.2 Often, actions by the public and businesses to improve either, will improve both. But action specifically targeted at local air quality tends to be more effective in that area than the incidental effect on local air quality of climate oriented activity.

3.3 What pollutants are we concerned about in Cheltenham?

Air pollution has been monitored, modelled and reported on for many years, with most current activity evolving since legislation passed in the early 1990s. Earlier legislation was aimed at dealing with visible smoke that was typified by the “London smog” incidents of the 1950s. The last 30years’ work has allowed us to determine that many pollutants are found locally at low levels that do not cause great concern and are well within legal limits or guidelines for exposure. The remaining pollutants of concern are:

Nitrogen dioxide (NO₂).

This pollutant largely derives from burning fossil fuels, so the main local source is road traffic. In some areas of the country industrial sources may contribute significant amounts of NO₂, but there are no significant industrial sources of NO₂ in Cheltenham. Levels of NO₂ are slowly declining across the country and this is reflected in local data. The reasons for this are complex, but include:

- Cleaner vehicles using the roads.
- Fewer vehicles using the road and quieter rush hours (a step change, post-covid).

Despite this generally improving picture, levels of NO₂ in small areas can be adversely affected by increased road congestion due to new development and changes to circulation patterns.

Particulate matter (PM_{2.5} & PM₁₀).

Particulates in air can be described as “anything in the air that isn’t a gas”. Particulates are the scientific terminology for dust and smoke. PM_{2.5} is material that will pass through a 2.5micron filter, and PM₁₀ will pass a 10micron filter. Some particulates arise naturally, from dusty, dry materials, and can be transported in the high atmosphere on an inter-continental scale,

such as the “Saharan sand” that is often seen accumulating on cars etc. Other particulates come from more local sources including burning solid fuels including wood or coal-type products, and other fossil fuels. Particulates also come from industrial sources including combustion processes. Agricultural sources are also a significant source (mainly of PM2.5), as PMs can be caused by the application of some types of fertilisers.

3.4 Over the last few years, national attention has shifted from levels of NO₂ towards PM2.5. This is partly because of the decline in NO₂ levels, but also because of increasing research into the effects of PM2.5, helped by improvements in modelling and measurement of PM2.5, which until 5-10 years ago was prohibitively expensive.

3.5 How do we measure air quality at CBC?

Local air quality management is carried out by Environmental Health Officers of the Public and Environmental Health Team, part of the Public Protection Division.

Description	Pollutants	Purchase cost	Running Costs (approx. annual)	Use	Where this equipment is installed.
2 x Beta Attenuation Monitors (BAMs)	PM2.5 PM10	Total cost of 2 monitors £35k	Electric £2000 Servicing & Data fees £2200	Measures PM2.5 & PM10 on main road. Allows assessment of modelling.	Gloucester Rd, Benhall
NOx monitor	NO NO ₂	£15k	Servicing / calibration / hire £8000 Data handling and QA £1000	Accurate NO ₂ measurement and cross-reference of NOx tubes	Corner of Swindon Rd /St.Georges St.
9 x AQ Mesh pods.	NO ₂ PM2.5 PM10 Indicative standard only	£7k each	Sim / data (solar powered) £2700	Assessment of potential localised effects, often at vulnerable locations. Re-locatable. Getting old.	Glos Rd, Benhall College Rd 422 High Street St Pauls Med Centre PE Way R'bout Winchcombe St

					Princess Elizabeth Way Glos Rd. School
2 x Earthsense Zephyrs	NO ₂ PM2.5 PM10 Indicative standard only	£8k each	Sim / data (solar powered) £700 (estimated)	Exclusively used by schools' education project	Moved around various school sites across borough
46 x NOx tubes	NO ₂	£4.60 per site, per month	£2260 pa	Cheap, reliable. Annual average calculated from monthly figures.	46 sites of interest, including major road junctions / housing close to congested roads

3.6 The situation in Gloucestershire is described in a report produced in 2023: [Air Quality in Gloucestershire](#). This considers the effects of air pollution across the county in some detail. It is worth noting that in the Executive Summary this report states: "In 2021 there were 355 deaths attributable to air pollution in Gloucestershire".

3.7 Further detailed evidence on the health effects of poor air quality, including inequalities can be found in the [Chief Medical Officer's Annual Report 2022](#) and the position statement from the [Royal College of Paediatrics and Child Health](#)

3.8 National Policy, limits and obligations

National policy on air pollution sets legal limits for pollutants which, if exceeded require further action to reduce their levels. Limits are set for long-term (annual) exposure to reflect health effects on those living in polluted areas, and short-term exposure for chronic exposure incidents.

3.8.1 Other limits or targets, which are far more challenging are set by the World Health Organisation (WHO) as shown below:

Pollutant	DEFRA		WHO	
	Annual	Short-term	Annual	Short-term
NO₂	40ug/m ³	200ug/m ³ up to 18x per year	10ug/m ³	25ug/m ³ over 24hrs
PM2.5	10ug/m ³ by 2040		5ug/m ³	15ug/m ³ over 24hrs

PM10	40ug/m ³	50ug/m ³ as 24hr mean, up to 35x per year	15ug/m ³	45ug/m ³ over 24hrs
Ozone		100ug/m ³ up to 10x per year (as an 8hr average)	60ug/m ³	100ug/m ³ over 8hrs

When considering limits, it should be noted that although there is a commonly-held view that no pollution is acceptable, it is also not achievable.

3.8.2 The law requires that if any area is found to be failing to comply with limits of a particular pollutant, the local authority is required to declare an Air Quality Management Area (AQMA). Subsequently, the Authority is required to produce an Air Quality Action Plan (AQAP) which identifies steps to control that pollutant in that area, and possibly beyond the boundary of that area. The history of AQMAs in Cheltenham is that a very limited area at the corner of Bath Road and High Street was declared an AQMA for an excess of NO₂ in 2008. This was replaced by a whole-borough AQMA (again relating to NO₂) in 2011, in an attempt to highlight broader issues and attract funding for air quality improvement works. This whole-borough approach was found to be unjustified by expanded monitoring and failed to address pollution issues in the worst affected areas. As a result, with the approval of DEFRA, the 2011 whole borough AQMA was revoked in 2020 and replaced by a considerably smaller area, covering High St from Tewkesbury Rd / Gloucester Rd – Poole Way – Swindon Rd as far as St. George’s St. Current monitoring results (as reported in the 2024 ASR) suggest that post-covid levels of NO₂ pollution in this area have also fallen to below legal limits, and it is likely that the AQMA will need to be revoked in the near future.

3.9 What we do with the data.

The monitoring systems that we operate at Cheltenham Borough Council produce more data than the rest of the county combined. We use it to identify any areas of non-compliance with limits, and areas of poorer air quality where most action is needed. It is through gathering this data that we have over the years identified the areas of non-compliance that lead to the declaration of various configurations of air the quality management area.

Data from our systems is reported to DEFRA through the ASR and some is published on our website and by other agencies. Some of the monitoring equipment we use produces considerable volumes of data, which needs to be shared in a summarised form, and other data is subject to verification processes which may mean that only annual figures are available. Monthly results from NO_x tubes are published online and updated as data becomes available each month.

[Monthly NO₂ figures from Nox tubes.](#)

Monthly figures from particulate monitors has also recently been added to this

page:

[Monthly figures from particulate monitors.](#)

As can be seen from the results obtained from the NO₂ monitoring station in Swindon Road, levels of NO₂ dropped considerably during 2020 as traffic levels plummeted and with it traffic congestion:

	2019	2020	2021	2022	2023
Annual NO₂ (ug/m³)	36.0	24.7	25.3	27.0	25.3

Similar patterns of NO₂ levels can be seen at most other monitoring locations. Post-pandemic, levels of NO₂ pollution have not gone back to pre-2020 levels. This has been attributed to considerably more people working from home and reducing their commutes, or delaying their journey to avoid the busiest periods. Over the same time there has been a gradual but continuing rise in the use of cleaner, more efficient vehicles, including more hybrid and electric vehicles.

Our newly installed monitoring of PM_{2.5} and PM₁₀ is starting to build a picture of annual levels which suggests that at the monitoring location PM_{2.5} levels are currently around the 2040 target level.

	2023	2024 (to end June)
PM_{2.5} (ug/m³)	9.6	9.3
PM₁₀ (ug/m³)	17.0	15.6

3.10 Action taken to address the pollutants

The effects of action taken by Cheltenham Borough Council to reduce air pollution are difficult to separate from wider societal changes in behaviour. In particular there was a step-change in work and commuting habits during and after the covid pandemic.

3.10.1 The 2024 ASR contains more detailed discussion on efforts to implement actions identified in the AQAP that will contribute to controlling NO₂ in particular in the AQMA, but also more generally across the borough. Some actions in the AQAP will also contribute to reducing levels of PM_{2.5}. Many of these actions are delivered by partner agencies, including Gloucestershire County Council, with assistance from Cheltenham Borough Council. As discussed above, many projects delivered under a banner of “climate change” have a beneficial effect on local air quality, for example the continued expansion of roadside and parking area electric vehicle re-charging points.

3.10.2. Of note is the success of the Schools AQ Education Project Officer in engaging with young people in education settings, which is using the slogan “Care

for our Air”:

To date, the Care for our Air project has engaged with 3465 pupils across 19 schools in Cheltenham. This equates to 35% of all schools in Cheltenham having been engaged with in the first year of the project.

Highlights of the year include:

- High School Leckhampton running a successful anti-idling campaign focussing on their drop-off area which saw a drop in pollutants as a result, which the pupils then displayed at a Cheltenham Education Partnership event at the Wilson.
- The Catholic School of St Gregory the Greats achieving their bronze Mode Shift Stars award having completed 20 actions towards improving air quality.
- Charlton Kings Infant School achieving their Eco Schools’ Green Flag award with merit having focussed on the topic of transport – setting up Park and Stride locations, raising awareness of anti-idling and monitoring pollutants at their setting using an Earthsense Zephyr.
- Delivering a successful bus banner campaign across Cheltenham and the wider area in support of Clean Air Day which will have been seen by 294,610 people (according to Global, the advertising company who work with Stagecoach).
- Delivery of an anti-idling mural on the corner of Queen Street and Swindon Road for Clean Air Day, painted in Graphenstone paint which absorbs CO₂ as it dries.
- Collaborated with No Child Left Behind to run a Clean Air social media campaign in June, which culminated in a poster competition where the winner had their design displayed on a Cheltenham bus stop. We received 75 entries in this competition.
- Commenced delivery of the Pollution Revolution project for academic year 2024/25, which involves 6 of Cheltenham’s secondaries (both private and state) in building their own particulate matter monitors and measuring pollutants at their location. Once the pupils have analysed the data, each school will run an intervention at their setting to reduce pollutants.
- Application towards the Gloucestershire County Council Clean Air Fund (yet to be approved) with the ambition of running a schools and social media based anti-idling campaign.

With the support of the Director of Public Health we have submitted a bid to the Public Health Interventions Research Study Team (PHIRST) for this project to be officially evaluated.

3.10.3 The PM2.5 network around the UK has been established by Defra via a subset of stations on the automation urban and rural network (AURN). The majority are funded and operated by the Environment Agency (EA). We are currently working with Defra and the EA to affiliate one of our monitoring sites

which will ensure the continuation of robust and reliable data for publication.

3.10.4 We have submitted an expression of interest to take part in DEFRA's upcoming project with local authorities to review the resources available to enable us to contribute the delivery of the Environment Act 2021 fine particulate (PM2.5) targets as stated in the 2023 Air quality strategy.

4. Next Steps

4.1 When considering our approach to future air quality work, we need to consider work that is both required or recommended by regulation, and work which is optional but will have a positive effect on local air quality. We need to manage expectations within resource availability.

4.1.1 Revoke AQAM and produce and Air Quality Strategy.

Current DEFRA guidance suggests that it will become necessary to revoke the existing AQMA in the next year. An AQMA is usually required to be revoked where monitored levels have not exceeded limits or been within 10% of that limit at any location for 3 years. Compliance will be determined by the annual monitored levels of NO₂ which will be confirmed in early 2024. When the AQMA is revoked, the accompanying AQAP will become obsolete. In replacement a new Air Quality Strategy will be required, which will include plans to improve air quality across the borough. Air Quality Strategies written to these requirements are a new type of document and very few have been published nationally at this stage. It is likely that an external contractor will be required to conduct consultation with interested parties and produce the document and that additional resources will be required to implement any resulting action plan.

4.1.2 Revise Smoke Control Zones/Areas (SCA) alongside an education and enforcement campaign

Previous plans in relation to air quality improvement, including the 2024 AQAP have considered the need to make changes to boundaries of the existing smoke control zones. Modelling of pollution levels has shown that domestic solid fuel burning is the largest contributor to PM2.5 levels in the town. The current pattern of smoke control zones/areas forms a patchwork across the town, with boundaries that follow no obvious logic and in places run through the middle of houses. Making changes is largely a bureaucratic process that involves publicising changes and allowing public comments or objections. Where controls apply it is an offence to emit smoke from a domestic chimney, and a fixed penalty can be issued after following a rather complex system of issuing a warning letter, against anyone causing a visible smoke emission. The initial FPN is set at £175 - £300. In amending the boundaries there is considerable value in using the opportunity to publicise and educate residents on fuel and appliance requirements, rather than trying to pursue rigorous enforcement which requires considerable manpower input and small financial returns.

4.1.3 Run an anti idling campaign alongside education and enforcement.

CBC has recently moved towards delegating powers to officers to carry out enforcement of anti-idling powers against motorists. As with SCZ enforcement above, education needs to form a considerable part of any idling project before enforcement takes place. The legislation requires that drivers who allow their vehicle to idle are challenged at the roadside and invited to stop the engine. If they continue to allow idling the driver can be issued a fixed penalty to a maximum of £20. In practical terms, enforcement is likely to be thwarted by motorists moving a vehicle before a fine can be issued or turning their vehicle off before re-starting when the officer moves away. We have recently applied to GCC for grant funding for anti-idling material to be displayed at schools as part of the Education Officer's involvement.

4.1.4 Website Improvements

There is considerable opportunity to improve the information on, and practical uses of the CBC website. Currently the air quality web pages contain considerable historic information on pollution monitoring results and archived documents. This information may give context to changes we need people to make to their activity, but largely fail to actively promote change. The data we obtain needs to be displayed more contemporaneously and needs to explain and promote the need for different choices to be made.

4.1.5 Challenges

There are considerable financial challenges in delivering a programme of air quality improvements. The Air Quality Education Projects Officer has a 3-year fixed-term contract until 2026. This post is funded entirely by GCC following a successful bid to repurpose some of the Covid contain outbreak and management (COMF) fund, recognising that those affected by poorer air quality were disproportionately affected by Covid.

Our monitoring systems have ongoing costs including maintenance and data processing. Most of our existing hardware has been funded by using funding from central government sources, however DEFRA abruptly cancelled all existing air quality grants in May 2024 and no replacement sources of funding have been identified by the new government.

The current air quality service forms one aspect of the work of the Environmental Health Officers within the Protection team. They also have responsibilities for other functions such as the noise and statutory nuisance service, the environmental permitting regime, public health funerals and private water supplies. Without a dedicated Air Quality Officer there is insufficient capacity to do more than our statutory responsibilities and customer and partner expectations must be managed.

Background Papers

[Cheltenham 2024 ASR](#)
[Cheltenham 2024AQAP](#)
[RCPCH Position Statement](#)
[Chief Medical Officer's Annual Report 2022](#)
[DEFRA Air Quality Strategy 2023](#)

Contact Officer

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Accountability

Cllr Victoria Atherstone, Cabinet Member Safety and Communities

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Information/Discussion Paper

Overview & Scrutiny Committee

Monday 25th November 2024

Understanding Barriers to Affordable Housing Delivery

This note contains the information to keep Members informed of matters relating to the work of the Committee, but where no decisions from Members are needed.

1. Why has this Discussion Paper come to Overview & Scrutiny?

The Overview and Scrutiny Committee have asked for an update on affordable housing delivery in Cheltenham, along with an examination of the barriers and opportunities relating to the delivery of affordable housing.

This paper will therefore focus on the following:

- [Past and future projected affordable housing delivery in Cheltenham](#)
- [Barriers limiting affordable housing delivery](#)
- [How is Cheltenham addressing barriers to affordable housing delivery?](#)
- [Opportunities to increase affordable housing delivery](#)
- [National Affordable Housing Delivery Best Practice](#)
- [Other Council initiatives currently under consideration](#)

2. Summary of the Issue

Increasing Affordable housing delivery is a key corporate priority for Cheltenham Borough Council, as set out in our [2023-27 Corporate Plan](#) and [Housing, Homelessness and Rough Sleeping Strategy 2023-28](#).

The council works actively to increase affordable housing delivery across the Borough, with a summary of key activities undertaken being found within our latest [Housing Strategy Action Plan Update \(2024\)](#).

The current Government affordable housing definition covers homes for rent, discounted market sale and affordable home ownership. This is found on page 67 of the latest [National Planning Policy Framework \(NPPF\)](#).

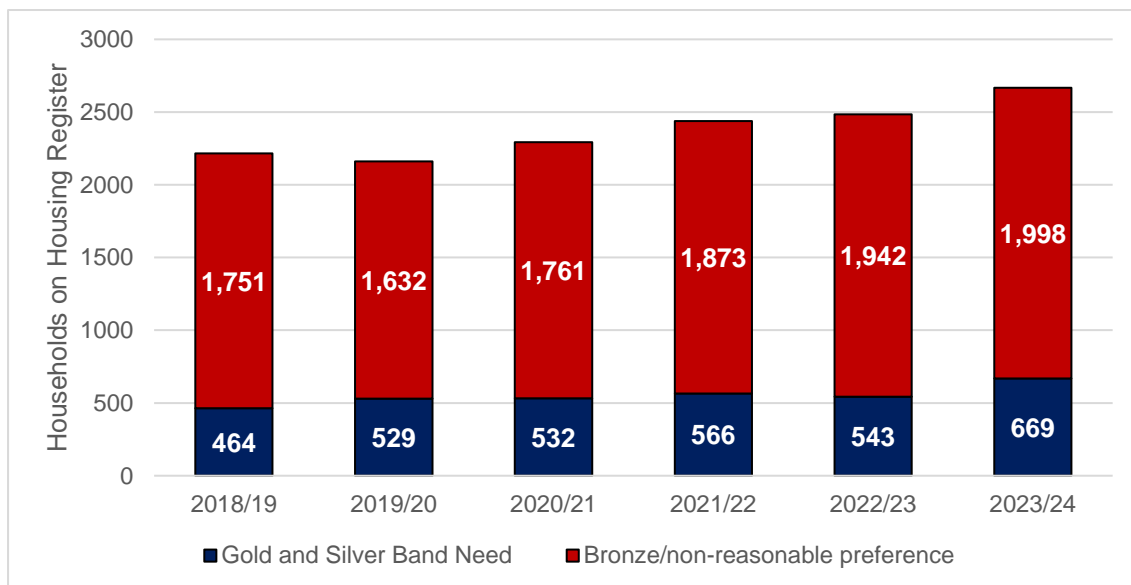
Cheltenham’s primary affordable housing policy ([Joint Core Strategy](#) Policy SD12: Affordable Housing) states that on sites of 11 homes or more in Cheltenham, 40% on-site affordable housing will be sought. Within the Strategic Allocations (which for Cheltenham include West Cheltenham and North West Cheltenham), 35% on-site affordable housing will be sought.

3. Past and Projected Future Affordable Housing Delivery

The [2020 Gloucestershire Local Housing Needs Assessment](#) (LHNA) identifies that Cheltenham has an affordable housing requirement of 194 affordable homes per year. This figure is separate from the 5 Year Housing Land Supply requirements.

In addition, an annual snapshot from our housing register is found in Figure 1 below. This clearly shows that there are growing affordable housing pressures locally. This mirrors wider national pressures.

Figure 1- Cheltenham Borough Rented Affordable Housing Need from 01 April 2018 to 31 March 2024:

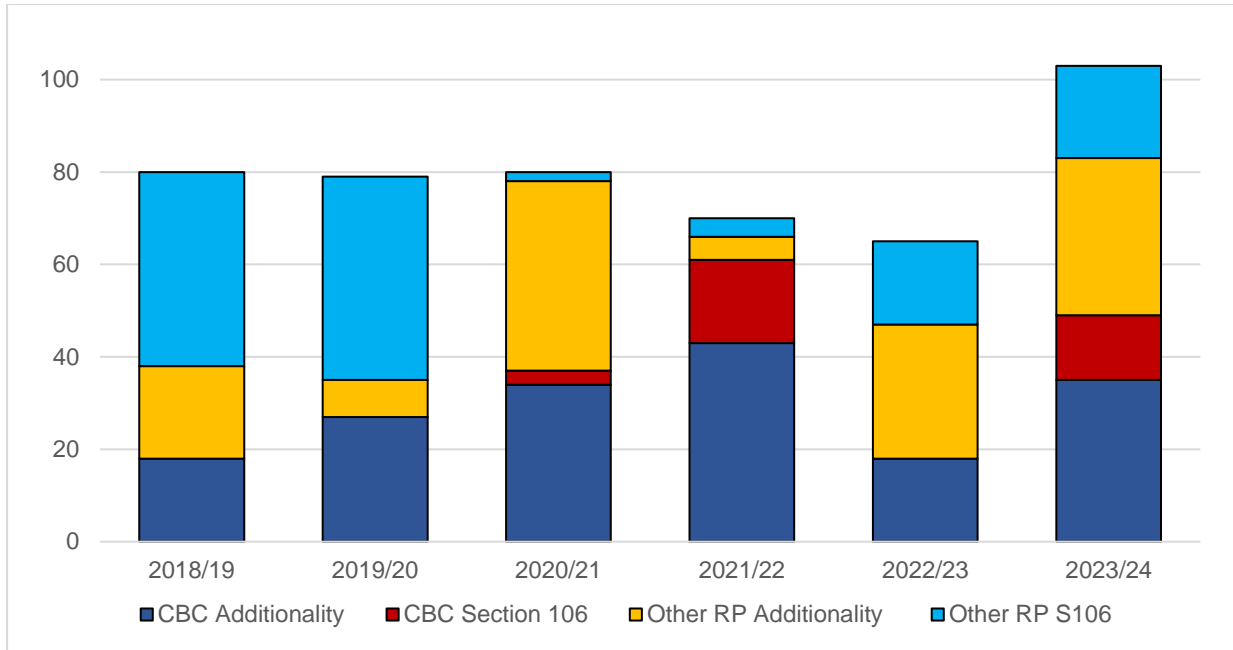


A key strategic priority within the council’s [Housing, Homelessness and Rough Sleeping Strategy](#) is to support affordable housing delivery over and above that which would otherwise be provided by market forces alone. We call this delivery ‘additionality’.

Over the last 6 years to March 2024, 477 affordable homes have been delivered in Cheltenham. Of these, 312 affordable homes were delivered as ‘additionality’. The remaining 165 affordable homes delivered via Section 106 agreements.

This delivery is captured visually in Figure 2 below.

Figure 2- Affordable Housing delivery by source in Cheltenham Borough from 1 April 2018 to 31 March 2024:



Additional details about the actual number of affordable homes delivered each year is provided in Table 1, below.

Table 1- Affordable Housing Delivery in Cheltenham Borough from 1 April 2018 to 31 March 2024:

Financial Year	CBC Additionality	CBC Section 106	Registered Provider Additionality	Registered Provider Section 106	Total Affordable Homes
2018/19	18	0	20	42	80
2019/20	27	0	8	44	79
2020/21	34	3	41	2	80
2021/22	43	18	5	4	70
2022/23	18	0	29	18	65
2023/24	35	14	34	20	103
TOTAL	175	35	137	130	477

It follows that delivery falls short of the council’s annual 194 affordable housing requirements referred to in section 3.1 above, despite significant efforts to boost delivery (which we will address in [Section 5](#), below). It should be noted, however, that these challenges are not unique to Cheltenham.

Table 1 also shows how direct intervention through the Council’s Housing Revenue Account (HRA) has made a significant contribution to affordable housing supply within our Borough.

The council has directly delivered 210 affordable homes from April 2018 to March 2024, equating to 44% of overall affordable housing delivery. 175 of these council-owned affordable homes (83%) have been delivered as ‘additionality’, the majority of which (i.e. 138) have come about through the council’s buyback acquisitions programme.

In terms of future affordable housing delivery, Table 2 (below) sets out our projected delivery trends to March 2030. These projections are highly speculative, as they assume that future planning applications will secure planning permission and that developers will start on site with little or no delay.

These projections also assume that all Cheltenham Borough Council projects can secure external funding (where required) and that Cheltenham Borough Council’s buyback programme will deliver 25 acquisitions per annum until 2027/28. Members should note that this table includes projected delivery on the Strategic Allocations which are invariably highly complex sites.

It should also be noted that Table 2 includes affordable homes that fall within Tewkesbury Borough as part of the cross boundary Strategic Allocations. These homes will be allocated through a dual local connection between Cheltenham and Tewkesbury Borough. This means that those households with the greatest need across both districts will be prioritised for allocation.

Table 2- Projected Affordable Housing Delivery by source in Cheltenham Borough from 1 April 2024 to 31 March 2030:

Financial Year	AH Delivery:	Council AH delivery	Registered Providers	Registered Providers (to be confirmed)
2024/25	160	36	124	0
2025/26	195	81	29	85
2026/27	414	71	106	237
2027/28	457	83	93	272
2028/29	279	18	29	232
2029/30	266	0	16	250
Total	1,771	289	397	1,076

Whilst the projected delivery of affordable homes in the above table is by no means certain, by comparison, Table 3 (below) is much more likely. This is because Table 3 only includes projected affordable housing delivery on current ‘firm’ sites (i.e. sites that have secured detailed planning permission, and where the developer has already started on site).

Table 3 Projected Affordable Housing Delivery on 'Firm' Schemes from 1 April 2024 to 31 March 2027:

Financial Year	AH Delivery:	Council AH Delivery	Registered Providers	Registered Providers TBD
2024/25	160	36	124	0
2025/26	109	69	11	29
2026/27	131	66	0	65

Total	400	171	135	94

In summary, therefore, whilst Table 3 reflects a much improved affordable housing supply picture compared to past affordable housing delivery ([as set out in Table 1](#)), the council is still anticipated to fall short of meeting the LHNA’s annual affordable housing requirements of 194 affordable homes/year.

4. Barriers Limiting Affordable Housing Delivery

The council faces numerous challenges when seeking to increase affordable housing delivery in line with our [2023-27 Corporate Plan](#) and [2023-28 Housing Strategy](#).

4.1 Reliance on large, deliverable sites

Cheltenham’s reliance on larger sites (both strategic & non-strategic allocations) is a critical factor impacting on the delivery of affordable homes, due to the complexity associated with large strategic developments.

These complexities have been worsened by uncertainty surrounding the M5 Junction 10 programme. This has led to delays in the planning process, and potential development restrictions arising from possible highways limitations prior to the Junction 10 build out.

Strategic schemes typically have very long lead in times to secure planning permission, however, times have been extended in the context of the West and North West Cheltenham strategic allocations compared to the Joint Core Strategy housing trajectories. This has had knock on impacts upon affordable housing supply coming forward.

As we prepare the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP), we will reflect on the learning from the strategic allocations and will review the mix of sites to address delays arising from complex schemes.

4.2 Financial and Capacity restraints within the Housing Revenue Account

Despite committing [£180m through the Council’s Housing Investment Plan](#) to increase affordable housing delivery, the council’s HRA has finite capacity.

This capacity is impacted by higher borrowing costs through the Treasury’s Public Works Loan Board (PWLB) (a Government-backed lending scheme used by councils to borrow money to finance new affordable housing delivery).

In practice, Registered Provider (RP) support will be essential to deliver affordable housing provision at scale.

4.3 Increased Construction Costs and Section 106 issues

Over recent years, construction costs have grown faster than wider inflation, resulting in an inevitable pressure on many planned developments.

This increase in costs has been driven largely through materials shortages, price of raw materials and labour shortages. All of these have come about as a result of the COVID-19 pandemic, Brexit and wider global issues.

In addition, changes to building regulations and national planning legislation, including the building regulations and national planning legislation, including Biodiversity Net Gain (BNG) and Suitable Alternative Natural Greenspace (SANG) have all added costs to new development. This may have an impact on viability, and this in turn could affect future affordable housing provision.

Some RPs are moving away from delivering Section 106 schemes due to perceived quality, design and risk issues, combined with high costs associated with improving existing stock. However, at present, the council is not aware of any local challenges experienced by developers in securing agreements with RPs to secure section 106 affordable housing.

4.4 Increasing financial pressures faced by Registered Providers (RPs)

RPs face a range of financial challenges, including costs associated with:

- refinancing and servicing debts (due to higher interest rates and increased sector risk) resulting in higher borrowing rates.
- meeting revised Consumer Standard compliance and new health and safety requirements.
- upgrading poorer performing social housing stock to meet an Energy Performance Certificate rating of 'C' by 2030.¹

These pressures have reduced RP's financial resilience and debt cover, resulting in some large RP's cutting back their development pipelines, and instead concentrating on improving existing stock.

4.5 Viability Challenges

Viability can also reduce affordable housing supply.² Where the applicant cannot afford to deliver a policy compliant affordable housing requirement, our Joint Core Strategy (JCS) Policy SD12: Affordable Housing requires applicants to evidence this through an independently evaluated viability assessment.

From April 2012 to March 2018, a total of 357 on-site affordable homes were not delivered by developers evidencing viability challenges. This situation is not unique to Cheltenham.

¹ A thorough overview of pressures upon the housing association sector can be found in the [Regulator of Social Housing's October 2024 report on the Sector Risk Profile](#).

² Viability accounts for the cumulative cost of planning requirements, whilst ensuring that a developer can achieve a baseline profit level. Where this baseline profit level is unachievable, developers can submit viability assessments to seek to remove on-site affordable housing provision. Submitted viability assessments are independently tested by the Council.

In recent years, however, the position has improved. From April 2018 to March 2024 only 76 on-site affordable homes were not delivered as anticipated due to evidence presented through viability assessments.

4.6 JCS Policies

The JCS was informed by a viability assessment. Whilst the wording in our current policy creates opportunities for greater flexibility, it can also mean that securing accessible homes, and an appropriate range of property types to meet housing need is challenging.

The SLP provides an opportunity to consider new policies such as whether to introduce a policy requirement for accessible homes. A viability assessment will be undertaken to ensure that the SLP is deliverable and viable.

4.7 Costs of Net-Zero Construction

Whilst this is rightly a key corporate priority, Cheltenham's [Climate Emergency Declaration](#) and focus on delivering net-zero affordable homes also has the potential to adversely impact the financial viability of affordable housing delivery.

The government is also focussing on improving the energy efficiency of new-build homes through its new [Future Homes Standard](#). This will be an important stepping stone towards the [Government's 2050 net-zero target](#).

Whilst adopting net-zero requirements may lead to increased costs on current developments, in the medium to longer term it could lead to lower land values.

Positive work has taken place through the adoption of the [Climate Change Supplementary Planning Document](#), and we will be testing this further as we prepare the SLP.

5. How is Cheltenham addressing barriers to affordable housing delivery?

5.1 Ensuring there is a focus on 'additionality'

The council enables 'additionality' through a variety of mechanisms, as set out below:

5.1.1 Land-Led schemes (i.e. schemes developed directly by an RP)

The council has secured Homes England grant funding to enable affordable housing 'additionality' on land-led schemes. Recent examples include Radford Court and 320 Swindon Road which have/or are anticipated to collectively deliver 30 affordable homes as additionality.

On land-led sites owned by other RPs, the council has engaged with them to support additionality. This includes Old Gloucester Road (Phase 1), Bouncers Lane and Douglas Equipment (all owned by Bromford Housing). These 3 sites combined will deliver 133 additional affordable homes over and above what would have been delivered by a private developer on a similar-sized Section106 scheme.

The council will seek to improve information-sharing with Gloucestershire One Public Estate to unlock potential development opportunities.

5.1.2 Acquisitions and buy backs

The council has an ongoing buy-back programme. This programme aims to acquire up to 25 homes per year from the open market to boost affordable housing supply and reduce the impact of the Right to Buy scheme on overall council stock. Between April 2018 and March 2024, the council secured 117 affordable homes in this way.

The council also seeks to acquire entire schemes from the open market to boost affordable housing supply, especially where these schemes fall below affordable housing thresholds (10 units). A prime example is 8 x 2 bedroom social rented homes secured at Ingleborough Mews.

In addition, we are currently exploring another acquisition opportunity following plans by an RP to dispose of a small scheme.

The housing development team will continue to pursue feasible and financially prudent acquisition opportunities.

5.1.3 Reviewing potential sites across Cheltenham

The council has undertaken significant work to identify potential sites for affordable homes delivery, including sites falling just under the affordable housing policy requirement thresholds. To date approximately 70 sites have been considered for delivery through the HRA, though around 50 of these were either subsequently secured by other parties, or considered to be unviable for affordable housing development. These findings were shared with the Council's Cabinet Member Working Group, which was set up to oversee delivery of affordable housing by our then housing management organisation, Cheltenham Borough Homes.

5.1.4 Making best use of our Commuted Sums

The council aims to commit the use of our commuted sums strategically. (Commuted sums is funding secured for off-site affordable housing delivery where on-site delivery is unviable). We do this by focussing on additionality, and by supporting homes where affordable housing delivery is unfeasible without a commuted sum.

Between April 2018 and 31 March 2024, the council has spent £761,000 in commuted sums. This has resulted in an additional 32 affordable homes that would not otherwise have been delivered.

5.1.5 Delivering affordable homes above Section 106 requirements

Live discussions with developers are ongoing to try and secure above policy compliant levels of affordable housing on new developments, with support from Homes England grant funding.

Securing affordable housing additionality on Section 106 schemes will continue to form a key part of our work to boost affordable housing supply.

5.2 Focusing on Unlocking Stalled Sites

Housing Enabling is collaborating with various partners to unlock stalled sites across the Borough.³ Currently, only one site meets these criteria, namely Pittville School, where conversations are taking place with RPs to inform potential future planning applications.

5.3 Affordable Housing Delivery on Strategic Allocations

Notwithstanding the challenges associated with large Strategic Allocations, future delivery on these sites also represents a huge opportunity to boost affordable housing supply.

For example, the North West and West Cheltenham strategic allocations could potentially deliver 2,300 affordable homes upon completion.

In particular, the council's ownership of the Golden Valley can ensure that affordable housing delivery is achieved on a timely basis.

5.4 The Strategic & Local Plan

The preparation of the [SLP](#) gives the council an opportunity to introduce new affordable housing policies, as well as strengthening existing policies. For instance, this could involve assessing the viability of setting a higher affordable housing requirement on new strategic allocations.

Cheltenham's housing enabling team are leading on drafting the affordable housing policies based upon our learning in recent years and will be leading on interactive round table discussions with developers and RPs.

5.5 Affordable Housing Guidance Note

Working alongside the SLP authorities, Cheltenham's housing enabling team have been leading on adopting an affordable housing guidance note. This document seeks to provide developers, Members and residents with greater clarity around the interpretation of adopted JCS and Local Plan affordable housing policies to increase affordable housing supply.

5.6 First Homes Technical Advice Note (TAN)

In addition, the planning policy and housing enabling teams have been working on a First Homes TAN to outline the circumstances whereby delivering First Homes (a discounted market sale product for local first-time buyers) would be acceptable. This TAN will enhance the available affordable home ownership options for local residents.

6. Other opportunities to increase Affordable Housing Delivery

³ (i.e. major developments of 10 homes or more or where over 1000sqm of floorspace is created where planning permission has expired)

Despite facing significant barriers to increasing affordable housing supply, the council can benefit from several opportunities to boost affordable housing supply, as outlined below:

6.1 Land-led Delivery (100% affordable schemes and additionality)

Nationally, with some RPs currently losing their appetite for Section 106 development, a corresponding increase in land-led schemes could create more opportunities to deliver affordable homes by way of additionality through majority (50%+) or wholly (100%) affordable schemes.

6.2 Potential New Homes England Affordable Homes Programme

The conclusion of Homes England's current [2021-2026 Affordable Homes Programme](#) (which provided £12bn of Government grant funding to boost affordable housing delivery) raises the possibility of an enhanced new Affordable Homes Programme (to be confirmed in the Spring Statement).

An additional [£500m of funding was announced in the Budget](#) to support Homes England's current 2021-2026 Affordable Homes Programme, with a particular focus on delivering social rented homes.

A recent letter from the Minister of State for Housing and Planning outlines the [Government's ambitions and objectives for Homes England in 2024/25](#), including maximising social rented provision.

6.3 Revised National and Local Affordable Housing Targets

Recent Government proposals published within the [National Planning Policy Framework consultation](#) indicate a significant uplift to national housing delivery targets, including [a 53% uplift in Cheltenham Borough's housing delivery target](#) (rising from 545 homes per annum to 833 homes per annum).

This theoretical uplift in housing delivery could result in a significant medium-term increase in affordable housing delivery across Cheltenham Borough.

Notably, this uplift would be subject to favourable economic, labour and policy conditions being maintained.

6.4 Delivery of Strategic Allocation Sites

The anticipated delivery of strategic allocations at North West and West Cheltenham in the short-medium term offers significant opportunities for securing hundreds of affordable homes alongside Tewkesbury Borough.

The Council will continue to explore the possibility of securing additionality above and beyond policy compliant affordable housing provision on the Strategic Allocations.

7. National Affordable Housing Delivery Best Practice

Members should be aware that best practice is subjective in nature, and the council will need to think carefully about the unintended consequences of perceived best practice.

Any best practice that the council may choose to implement must reflect local housing need and market dynamics. However, some examples are provided below, which council officers are currently interested in exploring further:

- **Bristol City Council's** latest [Affordable Housing Practice Note](#) (AHPN) includes clear and easy-to-understand guidance around Bristol's approach to maximising affordable housing delivery across all sites, including a focus on delivering 75% social rent on new developments.

This AHPN complements the [Council's 'Project 1000' affordable housing delivery plan](#). The planning policy and housing enabling teams will explore specifying affordable housing tenures in our new SLP policies.

- **[Gloucester City's Adopted Local Plan Policy A6](#)**: Accessible and adaptable homes requires accessible (25%) and wheelchair accessible homes (4%) on new housing developments. In effect, this will increase the supply of accessible homes delivered on new developments, thus ensuring that new development (covering both affordable and market homes) reflects the needs of Gloucester's ageing population. Any potential impact on overall affordable housing delivery could be explored as part of the emerging SLP evidence.
- **South Gloucestershire's HomesWest Partnership** focuses on how RPs, working alongside the South West local authorities, can maximise delivery of affordable housing on all sites across South Gloucestershire, rather than focusing exclusively on strategic sites.

[By comparison](#), Cheltenham leads on the JCS Affordable Housing Partnership comprised of Housing Enabling Officers from the JCS Councils and Six RPs; known as the [Preferred Providers](#). The JCS Affordable Housing Partnership only applies to the JCS Strategic Allocation Sites.

The council, working alongside the JCS authorities, are strengthening this partnership by evaluating several RPs who have expressed an interest in joining our Partnership. To join the Partnership, these RPs must demonstrate that they can deliver and manage homes to a high standard, as well as being aligned with our key strategic housing priorities.

Ultimately, our partnership focuses on creating strong and cohesive communities and increasing affordable housing delivery on the Strategic Allocations, as well as supporting the local authorities to tackle homelessness and prevent rough sleeping.

8. Other council initiatives currently under consideration

8.1 Focusing on buying back larger properties

The council is currently exploring the possibility of focusing buy-back purchases on larger affordable homes to address acute overcrowding amongst larger affordable households.

8.2 Bringing empty homes back into use to support our affordable housing objectives

As part of our [Housing, Homelessness & Rough Sleeping Strategy 2023-28](#), the council has committed to exploring mechanisms to bring empty homes back into either affordable, private rented or market housing uses.

At present, there is very limited capacity to progress on this workstream due to the council's private sector housing team focusing on raising standards across the private rented sector, however, we will explore supporting this initiative in the future.

8.3 Making best use of empty town centre spaces

The council has prioritised bringing town centre spaces back into productive use and maximising opportunities to bring residential uses into the town centre through the Corporate Plan and the [Vacant Units and Town centre Land Use Efficiency Action Plan](#).

To this end, the council's housing enabling and housing development teams are working alongside the Head of Place Marketing and Inward Investment to explore opportunities to acquire sites for affordable housing purposes.

Additionally, the housing enabling team are exploring how we can deliver affordable homes on town centre sites with support from our planning team.

Background Papers	N/A
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Accountability	Councillor Flo Clucas, Cabinet Member Housing & Customer Services.



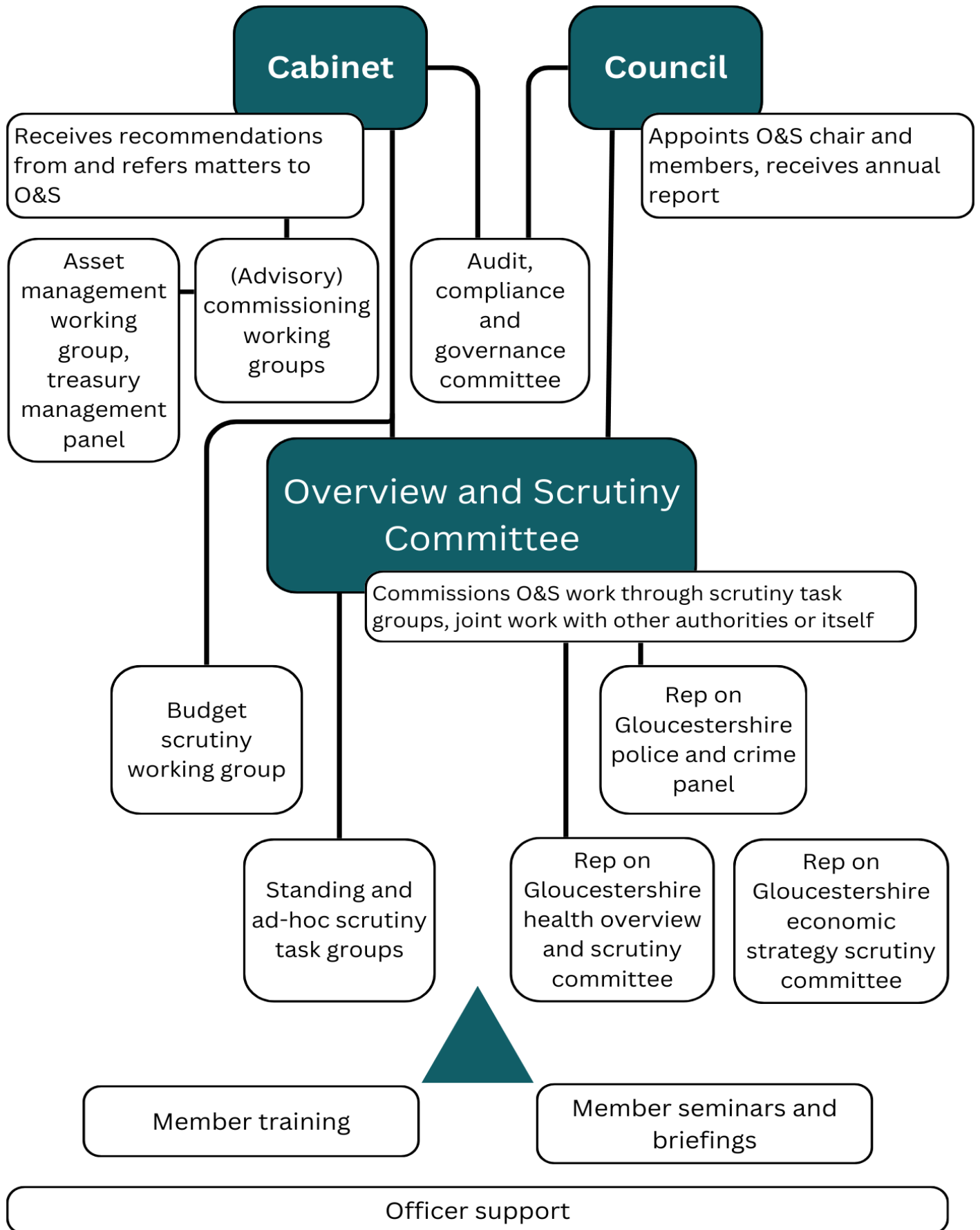
CHELTENHAM
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DRAFT Overview and Scrutiny

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Structure of Overview and Scrutiny



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Foreword

Councillor Tabi Joy, Chair of Overview and Scrutiny

I am really pleased to introduce the Overview and Scrutiny (O&S) Annual Report for 2023-24. This has been the cumulative effort of so many different people making positive contributions, and I'd like to take this opportunity to thank members of the committee both current and previous for their support and patience while I have adjusted to the role of Chair throughout my first year.

Thank you to the Director of Governance and Customer Services in her role as lead officer—her guidance has helped me tremendously—and to the Democratic Services team. Thanks also to the Chair of the Association of Democratic Services Officers, and to our external trainer who both delivered comprehensive chairing and O&S training that has helped greatly in getting us where we are today.

The O&S Committee has considered a wide array of issues since our last Annual Report, examining CBC's partnerships with the Cheltenham Trust, the Office of the Police and Crime Commissioner, Gloucestershire Airport, Ubico, Publica, Cheltenham BID, and many others.

One of our most notable actions this year was the first 'call-in' in recent memory, addressing the transfer of Cheltenham Borough Homes (CBH) to the council, transforming the arms-length management arrangement of two decades to bring their operations back in-house. This resulted in a new working group and ongoing scrutiny process, and I would like to thank Councillors Baker, Nelson, Flynn, Bamford and Williams, as well as CBH Board Member Ian Mason, for their hard work in bringing together the vital elements for O&S to consider in the transfer process.

It is good to note that CBC has been advised by the Local Government and Social Care Ombudsman that no complaints against the council have been upheld, demonstrating our good practice and effective operations.

I am very proud that the current O&S team has contributed towards the annual workplan, reconfiguring it for the upcoming year with suggestions of targeted approaches and areas of improvement based on member expertise and changing social needs.

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Members paid a visit to the Minster Exchange (MX) site in 2023 and subsequently reflected on learning from the project—see page 9

A review of the 2023 Race Festival was undertaken in July, together with a representative from Gloucestershire Police and the Head of Public Protection, to identify successes and lessons learnt—see page 8



A scrutiny task group was set up to consider the transition of housing services from CBH back to CBC—see page 7. Housing and homelessness was also addressed by the committee—see page 8

In February 2024, the Committee considered CBC's current tourism and marketing provision, which accounts for around 4% of borough-wide employment—see page 10



Budget Scrutiny Working Group

Councillor Tabi Joy, Chair of Overview and Scrutiny

The aim of Budget Scrutiny Working Group (BSWG) is to monitor council spending throughout the year as well as to examine incoming budget proposals. It is a good opportunity for non-Cabinet members of CBC to provide an independent review and feed in ideas on budgetary measures and responses to external pressures on CBC operations as a whole.

We are hopeful that the merging of CBH with CBC will give the council greater financial resilience in years to come, with the additional aim of integrating services to ensure they are more responsive to resident needs. The group noted the necessity of a rent increase to accord with the final year of the five-year rate guidance provided by Government, which ideally will help alleviate pressure on construction and maintenance costs for schemes and energy efficiency programs, while new compliance measures including Awaab's Law, which requires landlords to investigate and fix reported health hazards within specified timeframes, are also brought into force.

As part of the BSWG's oversight, the group was able to examine and comment on the 2024-25 Housing Revenue Account budget proposals, on General Fund Revenue and Capital Budget Proposals 2024-25, and the CBC Financial Out-Turn Report 2023-24.

BSWG notes that the cost of living crisis has persisted, and that the council's approach is to bolster cash reserves where possible in order to maintain resilience against a changing economic landscape. Members are aware that the council does not want to reduce service provision, but will need to be proactive in ensuring that financial targets are met and the budget is delivered effectively. Through the recent LGA Peer Review, it was noted that there was "shared understanding across the council of the financial challenges being faced," with a recommendation to improve training and reinforce mechanisms for monitoring Budget measures and ensure savings are delivered where needed, with accountability "built in both individually and collectively across the council".

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Scrutiny Task Group

Tackling Deprivation

The LGA Corporate Peer Challenge at Cheltenham Borough Council, which took place 18–20 July 2023, made specific mention of the “excellent” work of the Tackling Deprivation scrutiny task group, whose [report](#) had been published in time for the Peer Challenge visit. The work of the task group covered five points of action - Community Outreach, Health, Education, Housing, and Economic Growth and Employment. Many members of the community were included to collect an array of experiences and make recommendations based on best guidance.

Important context and information was disseminated to give background on the acute effects of inequality in Cheltenham, including statistics demonstrating that the average life expectancy for men in the most deprived decile is 8.7 years lower than that of those in the least deprived decile, with the disparity for women being 6.5 years.

Specific outcomes of intervention through the task group’s suggestions include:

- distributing key information on resource signposting and advice through staff and councillor training, as well as directly to households
- exploring a financial inclusion partnership
- using Housing Act powers to correct issues such as mould and damp through enforcement in the private rented sector
- tackling fuel poverty in CBH dwellings through retrofit and other energy efficiency measures
- collaborating with the NHS and Gloucestershire County Council to expand outreach
- calling health services and housing providers to account for the health risks of poor-quality homes
- intervening to prevent school exclusions, support those with Adverse Childhood Experiences, and promote digital literacy and access, along with green skills and jobs in order to contribute towards the Net Zero pathway
- maintaining access to safe, good-quality open spaces while addressing antisocial behaviours
- supporting those dealing with addiction through a whole system approach

In due course, the Overview and Scrutiny committee will reflect on the actions taken following the task group’s recommendations, and ensure that they take into account the changing realities of community support and social provision.

Scrutiny Task Group

Cheltenham Borough Homes to Cheltenham Borough Council Transition

O&S called in the [Cabinet Decision](#) of 17 October to bring housing services back in house, and met on [Monday 30 October](#) where it was agreed that a Scrutiny Task Group should be set up with the following terms of reference :

- To receive the integration action plan
- To actively contribute to the creation of a consultation framework in order to develop a Tenant Offer which will provide tenants and leaseholders with the opportunity to provide their view on the proposed change in management, state their priorities in shaping the future housing service provision, ensure their continued involvement, and complement the new consumer standards
- To actively contribute to the development of the future governance framework

Councillors Baker, Bamford, Flynn, Nelson and Williams were appointed to the cross-party task group and decided to co-opt a Cheltenham Borough Homes tenant board member, Ian Mason, whose input was very valuable.

The group met seven times and regularly reported back to formal meetings of O&S Committee before producing its final [report to O&S](#) in September 2024.



Other scrutiny

The committee scrutinised a number of key topics throughout the year, in addition to standard items, briefings from the Leader of the Council on key issues, and regular updates from task groups and representatives on county-wide scrutiny groups [Health Overview and Scrutiny, Police and Crime Panel, and Economic Growth Scrutiny]

Annual Report of the Police and Crime Commissioner

The Gloucestershire Police and Crime Commissioner, Chris Nelson, presented his annual report in [November](#). He was accompanied by the Chief Inspector. They spoke about how the new enhanced operating model has changed daily operational policing and responded to questions from Members about levels of criminality in Cheltenham with a particular focus on anti-social behaviour (ASB) and organised crime and the Safer Streets initiative.

Cheltenham Race Week

The objective of this session held in [July](#) was to review the 2023 festival, with the Head of Public Protection and the Police, and to identify successes and lessons learnt. There was a particular focus on additional measures, including reduced daily capacity at the racecourse, additional marshals, police and PCSOs between the racecourse and town, additional toilets and the 'war on wee', all of which appear to have resulted in fewer complaints about ASB compared to 2022. Littering, parking and traffic management remain issues to be dealt with by GCC and the racecourse, with recommendations to improve parking enforcement action and offer marshals specific training in traffic management.

Housing and Homelessness

All priorities in the CBC Housing Strategy and action plan, which was considered in [November](#), aim to address homelessness and rough sleeping, which primarily see investment in affordable housing options, existing stock, and community cohesion measures. There are new staff members and preventative techniques being adopted against a surge in the number of applicants seeking assistance, with additional wraparound support needs, including mental health management, asylum applications and post-carceral transition.

Other scrutiny

[continued]

Gloucestershire Airport

In [January](#), the committee looked at Gloucestershire Airport Limited's financial sustainability, both in relation to recent improvements and in the long term.

Minster Exchange [MX]

The committee undertook a tour of the site before reflecting on learning from the project with the Chief Executive, finance officers and representatives from the MX project throughout the year. As a town-based bridge to the Golden Valley Cyber Park, progressing from two existing sites at the Brewery Quarter and Gloscol's Cheltenham campus, Hub8 is building relationships and identifying community needs to offer a good programme of support. The site comprises open plan space, private meetings rooms, phone booths, and private offices for a wide range of needs.

O&S was able to ask questions in advance of its meeting in [September](#) about the progress the council was making towards its net zero target and considered achievements to date and future initiatives. Cheltenham Borough faces obstacles to addressing emissions, such as the high number of heritage buildings (for which we are examining case studies from Bath and West and Cambridge Universities). The newly-launched Retrofit Streets project will be used to inform the retrofit strategy more broadly, and better energy planning should be investigated to help deploy more extensive PV installation. Crowdfunding and community funding pathways should be considered. An ecologist has been recruited to help adapt to Biodiversity Net Gain legislation and locate wider spaces for tree planting.

Climate Emergency Overview

Other scrutiny

[continued]

Business Continuity

In [January](#), the committee considered the robustness of CBC business continuity arrangements in the event of a major incident. Members recognised the internal audit opinion of the robust ICT service delivered by Publica in its effort to keep the council's systems safe. Each council-run service has its own plan, and the next stage is carrying out Business Impact Analysis as part of a high-level Corporate Recovery Plan to maximise resilience. A recent cyber audit provided good levels of assurance, and a partnership with the Local resilience Forum has met compliance needs.

Tourism and town marketing provision

O&S considered CBC's current tourism and marketing provision at its meeting in [February](#). This accounts for around 4% of borough-wide employment, and CBC holds influence over events and destination management, year-round visitor economy marketing, inward investment, and commercial income generation in combination with UK Shared Prosperity Fund programme management. We are looking into Tourist Information service provision and day visit monitoring so we can respond to changing market needs and post-pandemic recovery. The council commissions an annual independent assessment of the volume and value of tourism, and the committee was recommended for to read this upon publication.

Equality, Diversity and Inclusion Policy (EDI)

Also in [February](#), pre-scrutiny of the draft EDI policy was undertaken by O&S to fully incorporate elements of the Equality Act 2010 and the Public Sector Equality Duty. An officer EDI working group has been established and Member-appointed Equality Champions will be introduced, alongside a two-stage process for equality impact assessments with an initial questionnaire followed up by more detailed analysis and responses for every report. All members and officers are encouraged to engage and complete mandatory training.

Other scrutiny

[continued]

CBC Flood risk management overview

O&S invited GCC to its [March](#) meeting as lead authority for flood management. CBC's flood alleviation work and planning process can reduce the amount of surface water entering the combined sewer system. Severn Trent has an ongoing maintenance plan and a scheme for improvements along the River Chelt but no others of which we are aware, although sewage overflows are primarily a Severn Trent issue while water quality enforcement is undertaken by the Environment Agency. CBC meets quarterly with Severn Trent, and O&S would also like to be included in these meetings.

The Strategic Flood Risk Assessment will be updated alongside the Strategic Local Plan, which is vital for any building developments on flood plains.

What next?

Since the election in May 2024, the Overview and Scrutiny Committee has considered its next steps

Overview and Scrutiny external training

An external trainer provided an informative and interactive session for 15 councillors, both new and existing, focussing on how to get the best results from the O&S process and the key skills and approaches required to do so.

Workplan

By inviting all members of the O&S group to consider items for the workplan, a wide range of suggestions have been prioritised and itemised for the coming year and beyond. These include:



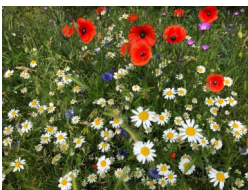
Local Planning Enforcement Plan

Scrutiny of the new approach and priorities for CBC's planning enforcement team, before the plan is submitted to Cabinet



Air Quality

Exploration of air quality in Cheltenham, including the national context, measurements and actions to address them, and future actions



Biodiversity Duty—first consideration report

Examination of current management arrangements for greenspace and best practice in terms of biodiversity and wildlife management



Golden Valley

To gain better understanding of the delivery of social value in the Golden Valley



Walking, cycling, and highways

Assessing the impact of the cycling spine, understand plans for low traffic neighbourhoods, and look at solutions for safer e-scooter usage



Heritage protection vs. sustainability

Scrutiny of the issues involved in developing a working balance between protecting heritage assets and implementing environmental solutions

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Report to November 2024 Meeting of CBC Overview and Scrutiny Committee**Summary of 15th October 2024 Meeting of GCC Health Overview and Scrutiny Committee**

A full recording of this meeting is available in the “Online meetings” section of the GCC website. The public information pack which includes all presentations is also available on this website. The minutes are not yet available, so this paper is based solely on notes I took at the time.

1. Scrutiny Items –**1.1 Gloucestershire Urgent and Emergency Care Winter Assurance Plan**

Prevention and early intervention were stated as the main aim of this plan. Very laudable and something that has been the mantra of most purchaser produced winter plans for at least the last decade.

Of course, people need to be encouraged to be fully vaccinated, to seek local support, e.g. from pharmacies, use their GPs, NHS 111, community mental health support and 999 as fully as possible but the reality is that the pinch point will end up being the acute hospitals.

The report highlights many community based initiatives to prevent this (and I wish them every success) but it is thin on reassurance that capacity at the acute hospitals will have the flexibility to cope adequately with what I believe is the inevitable substantial increase in demand that it will experience.

1.2 Update on Gloucestershire CC Motion 935 – Cancer Waiting Times

15 years ago, GHNHSFT was able to hit most of the Cancer Waiting Times (CWT) targets on a regular basis. The 62-day wait from referral to first definitive treatment was occasionally missed though performance would always be close to the 85% target.

For several years now it has not even reached 70% and is currently languishing at 65%.

I indicated in my previous report that this is a national problem which is primarily due to a lack of capacity in cancer pathways, increase in demand (i.e. the number of people with cancer that is treatable) and the wider range of treatment options now available (i.e. the number of potential treatments available to any one patient) which has not been matched by a sufficient increase in resource.

The failure to achieve this target represents a great deal of anxiety for each patient as they wait for treatment, and it is inevitably the case that this will sometimes lead to worse outcomes.

From the trend information currently available there is no evidence that significant improvement is likely in the near future.

A few days before the HOSC meeting, HOSC members visited the Regional Oncology Centre at Cheltenham General Hospital. It was an excellent opportunity not just to see the fantastic treatment facilities but also to discuss with Consultant medical staff, nurses and hospital managers the issues and problems they faced. We learnt that the failure to meet the 62-day wait target was primarily a diagnostic and surgical problem not an Oncology one. In Oncology there are fortunately still no delays for urgent treatment.

There are currently no problems with many cancer pathways such as those in Breast and Skin, but significant difficulties are occurring particularly in the Urology pathway and also the Lower GI (colorectal) cancer treatment pathway and not just with delays of over 62 days. Latest figures (for August 2024) show 63 patients over 104+ days - 45 of these being held by Urology, and 9 within Lower GI.

The pressures within these specialties has developed over a significant period and there are now specific improvement plans in place for Lower GI and Urology to address the performance in these specialties. A weekly Urology working group is led by the Deputy Chief Operating Officer at GHFT with the aim of continually driving improvement. Primary care training has also been delivered to minimise repeat and unnecessary referrals.

To reflect these findings and escalate the issue as best it could HOSC endorsed the Gloucestershire CC Motion 935 regarding Cancer Waiting Times.

2. Information Items – see presentations for full details:

2.1 Gloucestershire Integrated Care System (ICS) Performance Report

I have dealt with one of the main performance issues, namely Cancer Waiting Times above so will deal in this section only with other performance problems highlighted in the ICS report.

From a diagnostic perspective waits for all modes of endoscopy have considerably improved following the introduction of extra capacity as described in my last HOSC report, waiting times and waiting numbers are at a two year low despite an ever continuing rise in demand. Waiting times for echocardiographic have however become a cause for concern and a 7-day service for this diagnostic is now being planned to try to deal with the relentless increase in demand. Finally in diagnostics, referrals for CT and MRI have doubled over the last 5 years, turnaround times for scans and scan reports have thus suffered as capacity to has not increased at the same rate. A temporary solution is outsourcing whilst additional staff and equipment are planned.

As normal for this time of year 4 hour waits in A&E have improved slightly. The ICB is confident that it is on course to reach the March 2025 target of 78%. Also on a positive note, NCTR patients, those with No Criteria To Reside (called bed blockers until very recently) have substantially reduced from an average of 184 in 2023/24 to an average of

130 this year and only 104 at the time the report was written in September. If a figure around 100 can be sustained this would represent an extra 3 wards being available for those patients who really need an acute bed and if maintained into winter will enable a very welcome improvement in performance.

Elective waits of more than 65 weeks have risen since my last report to 549 whilst the number waiting over 52 weeks is essentially unchanged at 2920. A frighteningly high figure which shows little sign of improvement. Only 67.2% of elective patients hit the 18 week wait target.

Access to mental health services particularly children and adolescents remains a local and national problem but on a positive note the dramatic reduction in out of area referrals has been sustained with an average of only 1 patient per month receiving an inappropriate out of area referral. A thirty-fold decrease on last year's figures.

2.2 NHS Gloucestershire Integrated Care Board (ICB) Update – this report is now divided into 3 sections

- Section 1 an update on national and local commissioning issues
- Section 2 an update on primary care issues from the commissioner perspective (see 1.2 above)
- Section 3 an update from the 3 provider Trusts; Gloucestershire Health and Care NHS Foundation Trust (GHC), Gloucestershire Hospitals NHS Foundation Trust (GHT) and South Western Ambulance Service NHS Foundation Trust (SWAST)

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Overview and Scrutiny Committee Work Plan 2024-2025

Title	Objective	Format	Officer/Interested Party/Partner
13 January 2025 – (Deadline 3rd January)			
Cheltenham Trust	Assessing priorities and income targets including the impact of the collection development policy on user attraction.	Information/Discussion Paper	Head of Communities, Wellbeing and Partnerships
Social Value	Understanding the delivery of social value in the Golden Valley development	Information/Discussion Paper	Head of Development
3 February 2025 - (Deadline 24th January)			
Walking and Cycling and Highways	Assessing impact of cycle spine and process for consultation on such developments Understanding plans for low traffic neighbourhoods Identifying solutions for safer e-scooter usage	Information/Discussion Paper	Director of Communities and Economic Development Gloucestershire County Council Highways
24 February 2025 – (Deadline 14th February)			
Reconciling the challenges of heritage protection with sustainability measures	Identifying factors to develop a workable balance between protecting heritage and implementing environmental solutions (retrofit); Receiving feedback from the community retrofit project and other initiatives to meet our climate net zero targets.	Information/Discussion Paper	Head of Development Management, Enforcement and Compliance Climate Emergency Team
31 March 2025 – (Deadline 21st March)			
Climate Impact of Waste Disposal	Javelin Park and emissions	Briefing Note	Environmental Partnerships Manager/GCC
Culture Board	Assessing outcomes of the activities and measuring success against original objectives	Information/Discussion Paper	Head of Communities, Wellbeing and Partnerships

Overview and Scrutiny Committee Work Plan 2024-2025

Title	Objective	Format	Officer/Interested Party/Partner
28th April 2025 – (Deadline 18th April)			
Equality, Diversity, and Inclusion (EDI) and Accessibility update	Present impact of new EDI policy Identifying good practice and reviewing targets	Report	Director of Governance and Customer Services (Monitoring Officer)
7 July 2025 onwards – (Deadline 27th June)			
Minster Exchange	Update on first year of operation. Assessing the impact against original objectives	Report	Chief Executive
Housing Transition	An update on progress following the integration of housing services into CBC one year ago	Information/Discussion Paper	Chief Executive
Devolution	Assessing the opportunities and threats of devolution and how officers are prioritising/responding to these.	Information/Discussion Paper	Chief Executive
Draft Procurement Strategy	To consider the emerging CBC procurement strategy	Information/Discussion Paper	Strategic Procurement Manager
Empty Homes	Evaluating data and measures to encourage putting back in use and respective barriers	Information/Discussion Paper	Private Sector Housing