Cheltenham Borough Council Cabinet

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

Meeting time: **6.00 pm**

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

Membership:

Councillors Victoria Atherstone, Flo Clucas, Mike Collins, Iain Dobie, Rowena Hay, Martin Horwood, Peter Jeffries, Alisha Lewis and Izaac Tailford

Important notice – filming, recording and broadcasting of Council meetings

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

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

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

SECTION 1 : PROCEDURAL MATTERS

1 Apologies

2 Declarations of interest

3 Minutes of the last meeting (Pages 5 - 14)

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

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

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

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

SECTION 5 : REPORTS FROM CABINET MEMBERS

**5 Youth Voice: a process for hearing the voice of young people in
Cheltenham (Pages 15 - 90)**
Report of Cabinet Member for Safety and Communities

6 Local Validation Checklist (Pages 91 - 120)
Report of Cabinet Member for Planning and Building Control

**7 Delivery of Vacant Units and Town Centre Land Use Efficiency Action Plan -
update (Pages 121 - 134)**
Report of Cabinet Member for Economic Development, Culture and Wellbeing

8 Volunteering Policy and Processes (Pages 135 - 170)
Report of Cabinet Member for Safety and Communities

SECTION 6 : BRIEFING SESSION

15 Briefing from Cabinet Members

SECTION 7 : DECISIONS OF CABINET MEMBERS
Member decisions taken since the last Cabinet meeting

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

This page is intentionally left blank

Agenda Item 3

Cheltenham Borough Council Cabinet - Minutes

Meeting date: 17 December 2024
Meeting time: 6.00 pm - 7.00 pm

In attendance:

Councillors:

Flo Clucas, Mike Collins, Iain Dobie, Rowena Hay, Martin Horwood, Peter Jeffries, Alisha Lewis and Izaac Tailford

Also in attendance:

Gareth Edmundson (Chief Executive), Paul Jones (Deputy Chief Executive (Section 151 Officer)), Gemma Bell (Director of Finance and Assets and Deputy S151 Officer), Paul Hardiman (Community Infrastructure Levy (CIL) Manager), Martin Stacy (Housing Strategy and Partnerships Manager) and Ewan Wright

1 Apologies

Councillor Victoria Atherstone sent her apologies.

2 Declarations of interest

There were none.

3 Minutes of the last meeting

The minutes of the meeting held on 26 November 2024 were approved and signed as a correct record.

4 Public and Member Questions and Petitions

There were none.

5 Housing Revenue Account Revised Forecast 2024-25 and Interim Budget Proposals 2025-26 for consultation

The Cabinet Member for Finance and Assets introduced her report which, following the transition of housing services back to Cheltenham Borough Council, highlights opportunities to make effective efficiency choices, and investment in improving housing stock and in local community projects. These will ensure that standards are raised to the highest level across the housing portfolio, from stakeholders to tenants to shared owners. She said it highlights potential growth opportunities, with spare funds to re-invest in homes for the first time in many years.

The Leader agreed that these first HRA interim budget proposals to be put forward since CBH was welcomed back in house are exciting, and encouraged as many Members and members of the public as possible to provide feedback.

RESOLVED THAT:

1. **the interim HRA budget proposals for 2025/26 (shown at Appendix 2) are approved for consultation, including a proposed rent increase of 2.7% and changes to other rents and charges as detailed within the report;**

2. **the proposed HRA capital programme is approved for consultation as shown at Appendix 3 and the detailed capital programme in Appendix 4;**

3. **the revised HRA forecast for 2024/25 is noted;**

4. **following the publication of the Local Government Provisional Finance Settlement, authority is delegated to the Deputy Chief Executive (Section 151 Officer), in consultation with the Cabinet Member for Finance and Assets, to determine and approve any additional material that may be needed to support the presentation of the interim budget proposals for public consultation;**

5. **consultation responses are sought by 31 January 2025.**

6 General Fund Revenue & Capital - Interim Budget Proposals 2025-26 for consultation

The Cabinet Member for Finance and Assets said that she had discarded her original budget speech, predicated on the idea that the budget set for the next year would underpin the long-term financial future of Cheltenham, following the recent publication of the government's English Devolution White Paper.

She said she had come into local government believing it to be one of the most worthwhile forms of public service, based on the belief that the future of their town and the country as a whole could be brilliant when people give their time, talents and local knowledge to paving the way for that future. Long-term plans for local government have been made secure in the knowledge that when one councillor could no longer carry the mantle, someone else would follow.

This is why the budget now needs different framing in the current context. In one unfortunate stroke from central government, the council's role in safeguarding the money that Cheltenham has been granted through years of wise investment and careful management has fundamentally changed, and we have no choice as a council but to make the best decisions we can for our remaining lifespan – without knowing how long that might be. We may be in the last years where decisions about Cheltenham's future and how it spends its money are made in Cheltenham, by the people who know the town best. She said that decisions made now will set how decades of careful financial management and investment strategies play out over the next few years.

She reminded Members that the paper is a consultative document, and there may be some changes over the festive period while officers work out how to ensure that every last penny is invested for Cheltenham's long-term future. The budget is a prudent plan for long-term recovery, creating breathing space, room for innovation and smart choices, and space to make the decisions to ensure the long-term future carries on in the way liberals and those who believe in local democracy believe it should. Officers and Members know that doing the right thing is expensive but are confident that they will find a way; the budget proposals are the pinnacle of how we have managed to do so much with so little to date, and plan to do more.

She ended by commending the budget to Members, and thanking officers who have spent years ensuring that Cheltenham has the budget to do everything it can.

The Cabinet Member for Major Developments and Housing Delivery agreed with everything the Cabinet Member for Finance and Assets said, noting that the government's white paper was currently being analysed throughout the country, and thought that by the end of the consultation period, we may have a better understanding of its implications. The Cabinet Member for Finance and Assets agreed, but said the principle is that this is Cheltenham's money, and we will do everything we can to ensure it is spent on and for Cheltenham.

The Cabinet Member for Economic Development, Wellbeing and Culture welcomed the report, saying that Cheltenham had been self-governing for well over 200 years, and we need to be careful about the messages we send to central government and the care taken of local assets. He was pleased to note that three largely discretionary areas are protected – place marketing, local businesses, and Cheltenham's wonderful festivals, theatres, and heritage buildings. Management of finances, resources and investment decisions has always been sensible and wise, allowing for some sensible discretionary spending from people who know the local situation, and it is worrying to think that local government reorganisation will disturb the balance and lead to worse decision-making. He is pleased that this issue has been addressed in public.

The Cabinet Member for Housing and Customer Services agreed, saying it is important that people understand how much the council cares for local residents, the assets it has built up over the years, and how it is able to spend in a way people want – for example on culture, No Child Left Behind, and buildings – all important for the people of Cheltenham and in supporting local communities. She noted that commercialisation of the council in recent years had been a significant tool in

building the resources we have, and said she was always delighted to share information about our successes with colleagues across Europe.

She thanked the Cabinet Member for Finance and Assets for the presentation, which demonstrates in an understandable way what and how CBC is able to do what it does.

RESOLVED THAT:

1. **the interim budget proposals for consultation including a proposed council tax for the services provided by Cheltenham Borough Council are approved. The proposed Council tax for 2025/26 represents an increase of 2.99% a year for a Band D property, subject to the publication and consultation on the Local Government Provisional Finance Settlement;**

2. **the schedule of target savings and income generation at Appendix 3 is noted;**

3. **the growth proposals at Appendix 4 are approved;**

4. **the proposed capital programme at Appendix 6, as outlined in Section 13 is approved;**

5. **following the publication of the Local Government Provisional Finance Settlement, authority is delegated to the Deputy Chief Executive (Section 151 Officer), in consultation with the Cabinet Member for Finance and Assets, to determine and approve any additional material that may be needed to support the presentation of the interim budget proposals for public consultation;**

6. **consultation responses to be received by 31 January 2025.**

7 Counter Fraud and Enforcement Unit Collaboration Agreement

The Cabinet Member for Finance and Assets said that the Counter Fraud and Enforcement Unit team invests huge amounts of time and effort cross-county in tackling these issues, and it is particularly important for the discretionary services offered by the council that programmes such as this exist, to help protect vulnerable residents across the town. She welcomed the report and agreement, which is a continuation of what has gone before, and hoped that Members would back the recommendation.

The Leader confirmed that this report is brought to Cabinet every year with minor tweaks and updates, but is a really important part of what we do. She was very glad that the work is managed in-house, and said that sharing the team with other authorities is more effective than doing it alone.

RESOLVED THAT:

- **the council's entry to the Counter Fraud and Enforcement Unit Partnership Collaboration Agreement is approved.**

8 First Homes Technical Advice Note

The Cabinet Member for Housing and Customer Services began by thanking officers Martin Stacy and Ewan Wright for their work on this report over a period time. She said the paper is an advice note for developers, advising them on how CBC regards the differences between potential homes they may provide, in relation to first homes, shared ownership – our preference – and other areas. She confirmed that if any issues arise and changes need to be made in the next year or so, she will report back to Cabinet, in consultation with officers.

The Cabinet Member for Economic Development, Wellbeing and Culture welcomed the reiteration of CBC's policy on what the split of affordable housing should be, and agrees that while not very much can be done with the First Homes scheme, it is right that we put strong emphasis (75%) on affordable housing being social housing for rent. This is the view of the party both locally and nationally, as there are areas of Cheltenham, such as Leckhampton, where the affordability gap is enormous between what young people can afford and what the local housing market can offer. He welcomed this important part of the report and the emphasis of the policy, as well as the back-up advice for developers if first homes are appropriate.

The Leader also thanked officers for their work, aware of the huge amount of time involved and many changes that had to be made.

RESOLVED THAT:

1. **the First Homes Technical Advice Note (TAN) as set out in Appendix 3 is approved;**

2. **approves setting a £175 administration fee per dwelling to be charged by CBC to developers in respect of the initial sale of First Homes, and to vendors in respect of resales is approved;**

3. **authority is delegated to the Housing Strategy & Partnerships Manager to undertake any minor updates to the First Homes TAN (including the administration fee) in consultation with the Cabinet Member for Housing.**

9 To approve CBC's Fencing, Hedgerow and Boundary Policy

The Cabinet Member for Housing and Customer Services said this policy aims to help tenants look after their hedgerows, ensure fences are not too high, and deal with any fencing or boundary issues arising with private owners in neighbouring

properties. She said not only is it good that we can offer tenants this assistance, but also that Cheltenham will look better in some areas, and homes for hedgehogs and other wildlife will be provided.

RESOLVED THAT:

1. **the Fencing Policy is approved;**

2. **a review of the policy in one year is noted;**

3. **a request is made that, during the review period, officers carry out the actions set out in 5.2 of this report.**

10 Approval for publication of this year's Infrastructure Funding Statement and CIL Rate Summary Statement

The Cabinet Member for Planning and Building Control said that the council has a statutory legal obligation to publish both the annual Infrastructure Funding Statement and CIL Rate Summary Statement, and that this must be presented in an agreed way, in collaboration with strategic and local partners. He said the first meeting to make allocations from the pooled strategic monies will take place on 30 January, and work will be undertaken with other infrastructure providers to identify priorities that could be supported by the CIL Joint Committee.

He directed Members to a useful summary about receipts and allocations (i.e. funding agreed and given but not necessarily spent yet), noting that up to 5% is allocated to administration, up to 15% to parished areas (five in Cheltenham), and 15% to neighbourhood projects, leaving a strategic pot of 70% (currently showing at 80% because no bids have been submitted yet from some parts of the community).

Turning to the CIL Rate Summary statement, this is also a regulatory requirement based on the Royal Institute of Chartered Surveyors CIL Index, and details money passed to parish councils, non-parished areas of the borough, and S106 money allocated mainly for affordable housing, plus two other items. There is also a list of projects requesting CIL funding, across all three areas of the partnership.

The Cabinet Member for Finance and Assets thanked the Cabinet Member for Planning and Building Control for an interesting report and wondered if it would be possible to have a summary sheet of CIL funding so far, making it clear where money came in and went out. The Cabinet Member for Planning and Building Control felt that this had been provided in the past, and said he would ask the team to provide one.

The Cabinet Member for Economic Development, Wellbeing and Culture confirmed that this has been produced in the past, as the government-prescribed format is opaque and can be difficult to follow. He said the Infrastructure Funding Statements contains a lot of important information; he welcomed the detail of CIL funding of projects in unparished areas – including the Bath Road Utility Boxes, defibrillators,

and Honeybourne Honey – but noted that there was no detail about projects at parish level. He said this had been included in the past and was not sure why it was not included here. He also said it would be good to have a report on the actual expenditure, rather than just the money allocated, and added, in the interest of transparency, that he is a member of Leckhampton with Warden Hill Parish Council.

The Cabinet Member for Planning and Building Control said that the requirement is to show money allocated rather than spent, but agreed that that information would improve communication – a breakdown of where the money had been spent in the parished areas as well as the neighbourhoods. He undertook to bring this back to Members.

RESOLVED THAT:

1. **the publication of the Infrastructure Funding Statement (IFS) relating to the financial year ending 31 March 2024 by 31 December 2024 is approved;**

2. **the Annual CIL Rate Summary Statement will be published alongside it by the 31 December 2024 is noted.**

11 Briefing from Cabinet Members

The Leader invited Members to share any briefings.

The Cabinet Member for Economic Development, Wellbeing and Culture congratulated the Everyman Theatre on the launch of its pantomime, *Aladdin*, starring Tweedy the Clown. He said it is great to have a major regional theatre in Cheltenham, which also runs some important social programmes.

The Cabinet Member for Housing and Customer Services shared the following:
-   she has attended a couple of European meetings in the last few weeks, one of which included a good discussion of culture and how to utilise this to bring young people together to build better communities. She was happy to be able to share all that Cheltenham does;
-   many European councils do not view themselves as commercial entities, and it was good to show that it can be done and can make a significant difference;
-   in Leeds, at a meeting of the French Forum – which included ministers, two ambassadors, senior officers and a number of councillors - it was interesting to hear what goes on elsewhere and share what is done in Cheltenham. Of particular note was:
    -   a national music day in France, on 21 June, where all types of musicians and singers participate at all levels. She suggested looking at this as a cross-Europe event, and would love Cheltenham to take a lead;
    -   bringing together all the organisations, including the Council of European Municipalities and Regions and Euro Cities – comprising 41 countries and one million councillors – to exchange good practice, work together on European and other legislative interests. Together they could develop a European focus

for work, as a group, providing strength and support. This could provide another opportunity for Cheltenham to take the lead through the Local Government Association, and shouldn't be missed.

The Cabinet Member for Major Projects and Housing Development had nothing specific, but thanked all his teams for their hard work in complex and busy areas – the Golden Valley Development team and HBD have been working feverishly all year, as have other teams across the council, including housing delivery.

The Cabinet Member for Climate Emergency reported on a recent visit to Bournside School where a ground source heat pump is being installed to warm and cool Gloucestershire's largest secondary school. He was impressed by the vision and commitment of the school's head, Steve Jeffries, and the governors, investing in technology to reduce dependency on fossil fuels, reduce CO_2 emissions, and save money for the school. This contrasts with GCC's rejection of his suggestion to incorporate a ground source heat pump at the new Leckhampton high school, and he trusts that in future, every new-build school in the county will incorporate low-carbon heating systems as standard.

The Cabinet Member for Waste and Recycling and Public Realm raised two matters:

- a new tree sponsorship scheme has been launched at the Cemetery on Bouncers Lane. This type of memorial has traditionally been offered in public parks, but space has largely run out, and it is felt that the Cemetery is a good alternative, a nice, peaceful place to commemorate loved ones;
- waste and recycling collection over the festive period is being done differently this year, with collections from 25, 26 and 27 December rescheduled as bumper collections on 8, 9 and 10 January. This trial, primarily done so that the teams can have a proper break over Christmas, should help get collections back to normal sooner than previously, and he looks forward to the feedback.

The Cabinet Member for Planning and Building Control also thanked the dedicated and professional officers in his teams, who have been very busy, with new papers and updates almost every week this year. He said have been some major recent changes to the National Planning Policy Framework, with new housing targets in Cheltenham, and has asked the team to provide a policy briefing note to explain the changes, once they have had chance to analyse them fully.

The Cabinet Member for Finance and Assets reminded everyone that the budget consultation will be open throughout the festive period, offering the chance to have a say on how council tax is spent, particularly important as we head towards a new phase of local government. She thanked the finance and assets team, and also officers in Revenue and Benefits, OneLegal and the huge network of people who help the council manage its finances.

The Leader said it had been a real privilege to represent Cheltenham locally and nationally at many different events over the yea; it is clear that CBC is getting it right in many ways, in particular management of the races and the Golden Valley Development. She took the opportunity to reflect on all that the administration had achieved throughout the year and some challenges to come:

- welcoming housing colleagues back in house involved a great deal of work from many people, including residents, tenants and lease holders, whose ongoing input in the newly-formed housing committee will be essential in driving the service. She thanked officers who had helped with the transition, in particular the Chief Executive;
- the local elections in May and general election in July brought fantastic results for the LibDems, and she is pleased to be working with an MP of the same party, whose job is to do what he believes to be right for the people of Cheltenham;
- there have been a lot of issues round the Minster Exchange, but she is proud to say it is now officially open, 75% occupied, and a lovely place to work, alongside the refurbished Minster Gardens;
- Cheltenham is lucky to have such amazing parks and gardens, and has been awarded accolades for these, as well as for keeping people safe during race week and for its night-time economy;
- thanks to officers and Members for rising to the occasion when unexpected events occur, such as the fire in Regent Arcade, where a senior officer was out directing traffic;
- we are lucky to have received £20m from the government in support of the next step in the journey to delivering the innovation centre;
- officers are not only committed to but have also helped raise £1500 for charities, and donated 400 selection boxes which were delivered to local communities before Christmas;
- changes to the National Planning Policy Framework will bring challenges, and it is important that we work with our strategic national partners;
- regarding the newly-published government white paper, while we might not agree with the proposal, we should be thankful that the government is at least being clear about the direction of travel and approximate timelines, and take the opportunity to get on the journey, be swift with our early decision-making and, when the time comes, be able to reach a consensus which is best for the county;
- following a small loss last year, the council took the brave decision to bring back the ice rink in Imperial Gardens, and it is proving a huge hit, bringing many additional visitors to town with enormous benefits to local businesses. It has a new look this year, with trees and lights, and also relaxed glide sessions for those with sensory issues.

She congratulated Cheltenham Town women's football team for reaching the fourth round of the FA Cup for the first time in their history, and ended with a round of thanks:

- to all officers, some of whom will be working over the festive period;
- to all Cabinet Members, for their commitment and dedication throughout the year;
- to the Senior Leadership Team – a force to be reckoned with, who will be sure to seize the opportunity of change to local government to get the very best for Cheltenham.

12 Cabinet Member decisions since the last meeting

03 December 2024: Cabinet Member for Waste, Recycling and Public Realm, Councillor Izaac Tailford

[Award of contract for kerb-side sort recycling vehicles](#)

These vehicles will expand even further the range of kerbside recycling options in Cheltenham, to include soft plastics and tetrapacks, ahead of government targets for 2027.

17 December 2024: Cabinet Member for Finance and Assets, Councillor Alisha Lewis

[To approve exceptions to the council tax premiums on empty homes and second homes from April 2025](#)

This decision makes minor alterations to the ambitious scheme previously launched to raise additional council tax on long-term empty properties and second homes, following central government's decision to establish policy on these.

Cheltenham Borough Council

Cabinet – 18 February 2025

Youth Voice – a process for hearing the voice of young people in Cheltenham

Accountable member:
Cllr Victoria Atherstone – Cabinet Member Safety and Communities

Accountable officer:
Richard Gibson and Tracy Brown

Ward(s) affected:
N/A

Key Decision:
No

Executive summary:
In March 2023, a motion was agreed by Council to explore how young people can be more involved in the work of the Council via exploring options such as a youth council or a youth forum.

This report provides a summary of the work to date and the work ahead to support the recently launched No Child Left Behind (NCLB) Year of Youth Action.

Recommendations: That Cabinet:

1. **notes the update on progress made to date by No Child Left Behind set out in section 3;**

2. **notes the outcome from recent engagement with young people – see section 4 and appendix 4 – "In their own words – youth survey report";**

3. **endorses the work ahead to support the NCLB Year of Youth Action – see section 5;**

4. **endorses the principles of the national Hear by Right and agrees that a self-assessment should be completed – see section 6.**

1 Implications

1.1 Financial, Property and Asset implications

As there is no cost to carrying out the Hear by Right self-assessment, there are no financial implications identified as a result of the recommendations. If at a later stage, the Council wishes to attain accreditation, this will cost £1,900 which will require approval in line with the Council's financial regulations.

The Council will support the NCLB Year of Youth Action from existing staff resources and from within existing service budgets.

Signed off by: ela.jankowska@cheltenham.gov.uk

1.2 Legal implications

On the basis that no contracts or procurement required for this proposal, there are no direct legal implications.

It is understood that the NCLB Year of Youth Action will be signed up to voluntarily by participating organisations and as such, the Council should consider other requirements such as whether consent forms are required, whether staff interacting with the group should have DBS checks (or other safeguards in place to allow the Council to continue with the programme) and whether it has sufficient funding in place to allow the programme to continue.

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

1.3 Environmental and climate change implications

The completed dashboard and summary report is attached as **appendix 3**. The NCLB Year of Youth Action is generally positive in its contribution to social outcomes, with no associated environmental implications. The climate team is available to support any youth engagement surrounding the topics on environment, sustainability and climate change.

Report: NCLB Year of Youth Action including signing up to the Hear by Right proposals
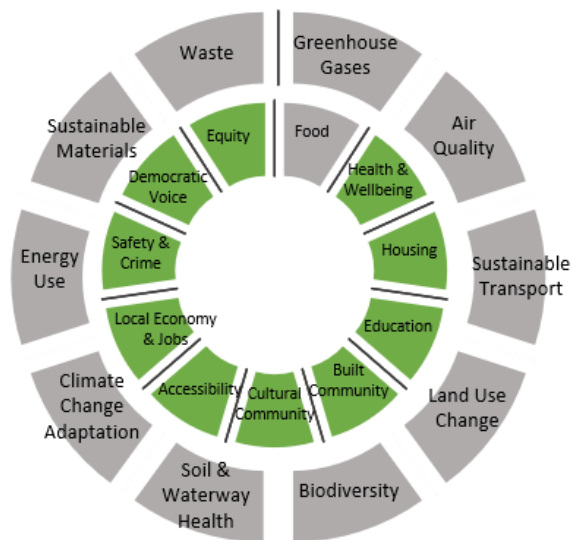
Signed off by: Maizy McCann, Climate Officer, maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:
- Making Cheltenham the Cyber Capital of the UK;
- Working with residents, communities and businesses to help make Cheltenham #netzero by 2030;
- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity;
- Being a more modern, efficient and financially sustainable council.

1.5 Equality, Diversity and Inclusion Implications

The equality quality impact assessment is attached as **Appendix 2**. The action from the impact assessment is to ensure that we are finding ways to engage as many young people as possible with protected characteristics.

1.6 Performance management – monitoring and review

A report on progress will be brought to meetings of the NCLB Strategic Board every two months.

The final report on progress will be brought to Cabinet in December 2025 for endorsement and to agree the next steps for 2026.

2 Background

2.1 On 20 March 2023, the [below motion](#) was agreed by full council.

Cheltenham Borough Council and its partners are proud of the outreach work undertaken to ensure that young people have a voice in the democratic process. The Council welcomes ongoing work to broaden this engagement strategy, including visits by the Cabinet Members Climate Emergency and Safety & Communities, to meetings with local young people as part of the Cheltenham Education Partnership, and engagement by the Cabinet Member for Economic Development, Culture, Tourism and Wellbeing with Gloucestershire College supporting their construction skills agenda.

This Council resolves: To refer the issue of mechanisms by which we can further involve young people in Cheltenham Borough Council life to Cabinet and the relevant Cabinet Member (Safety and Communities) to explore feasible additional outreach and inclusion options – with a youth council or youth forum as options to be costed and considered.

2.2 At Cabinet on 4 April 2023, the Leader of the Council asked the Cabinet Member for Safety and Communities to prepare an outline of the process and mechanisms, including a timeline, by which CBC can further involve young people.

2.3 On the 23 May 2023 [a briefing paper](#) (see page 13 of the minutes) was prepared for Cabinet, which stated:

"Youth engagement in local government also benefits the local community by ensuring that youth perspectives and voices are heard and considered as part of the work of the Council. It's important to recognise that there are different mechanisms and opportunities for engagement with young people across Cheltenham and we should not limit the art of the possible to a predetermine solution."

Rather than predetermine what the solution should be, it's proposed that an options appraisal will be developed and presented back to Council later in 2023. It's also important that options evaluated consider themes such as accessibility, inclusion, statistical rigour/representative, insight from young people, and how it will add value to the work of the Council."

3 Update on the work of No Child Left Behind

3.1 No Child Left Behind (NCLB) has four strategic priorities, one of which is to support young people become thriving adults by helping them overcome the challenges they face. A needs analysis commissioned by the NCLB in 2023

highlighted that young people were struggling with their emotional wellbeing, maintaining friendships, and school attendance. In addition there is increasing concern about the vulnerability of many of the town's young people to criminal exploitation. Understanding these issues are of critical importance when considering how to engage with young people.

3.2 NCLB is working on a number of initiatives to both broaden understanding of these issues and to support young people in Cheltenham. On 23 July 2024, [Cabinet agreed](#) to award The Rock a grant of £41,000 to enable the delivery of a programme of detached youth work in the Moors, St Pauls and the Town centre until March 2025. The Rock began delivery in August and have already engaged with over 300 young people.

3.3 With funding from the Home Office's Serious Violence Duty Fund, St Giles Trust, a London-based charity, was engaged in March 2024 to support NCLB tackle criminal exploitation in the town. St. Giles have reviewed support to young people who are being criminally exploited and offered training to professional and community members about exploitation. St. Giles have also been able to employ a dedicated exploitation case worker to work directly with young people in Cheltenham who are being exploited or at risk of exploitation. St Giles are also supporting NCLB to work with young women in the town who are vulnerable to exploitation to gather their lived experience and their ideas for making our communities safer.

3.4 NCLB has also been working with GCC in the development of the [One Plan for children and young people in Gloucestershire 2024-2030](#). The plan, which was launched in November, sets out a set of collective ambitions for all children and young people in Gloucestershire. The vision is that Gloucestershire is "A great place to grow up where children and young people thrive and live lives of choice and opportunity". To achieve the vision, there is collective commitment to four objectives:

- Equity – close the gap and eliminate inequalities;
- Access – right help at the right time for all children;
- Inclusion – a county where everyone belongs and we celebrate diversity;
- Quality – effective, outstanding services.

4   Recent engagement with young people

4.1 Given the briefing paper considered by Cabinet in May 2023, it was recognised that time should be taken to understand how young people themselves wish to be engaged with and not attempt to enforce a solution upon them. Whilst a youth council or youth forum may be appropriate it will only be successful if it attracts high levels of engagement and diverse representation.

4.2 With this in mind NCLB commissioned St Giles Trust to gather the views of young people in Cheltenham about a range of issues, including how to engage with them. Working with key partners a survey was developed which was then completed by young people through local schools, youth groups, community organisations and online. The results were then compiled into a report titled 'In their own words: Young Voices in Safety and Protection in Cheltenham' which was presented to the NCLB on 23rd September 2024 and attached as **appendix 4**.

4.3 The survey gathered the views of 578 young people, and as outlined in the report, the young people who responded provided a very good demographic spread when compared to the Cheltenham population. For more information about the demography of respondents, please see pages 14-16 of the appended report.

4.4 Key findings from the survey are as follows:

- Young people told us that their biggest worry is their future (42%) followed by education (39%), not fitting in (39%), family (27%) and their health (26%);

- Most popular free time activities are hanging out with friends (62%), online activities (59%) and sport/physical activity (45%). Young people choose how they spend their time based on the following factors; proximity and accessibility (37%), fun and enjoyment (36%) and affordability (28%);

- 88% of the young people surveyed said they didn't feel safe after dark in Cheltenham, with some hotspots of concern being Springbank, St Pauls, the Town Centre and Pittville Park. There were a concerning number of young people (38%) who said they knew someone who carries an item for their protection. While 18% said they themselves had carried an item for protection. This correlates with the growing concern within NCLB about increasing youth violence and exploitation;

- Some young people didn't feel safe in online spaces with 47% saying they had seen disturbing content online. 18% said they had told an adult about it. Snapchat, Tik Tok, YouTube, WhatsApp and gaming platforms were the most popular online spaces for young people to use;

- The majority of young people (58%) would turn to a parent or guardian for support. Sadly 7% of respondents said they had no one they could turn to;

- Only 18% of the young people who responded felt that they were listened to by adults in Cheltenham. This shows the importance of all partners finding ways to engage with young people moving forward. The report also outlines some of the ideas young people have to make life better for them in Cheltenham and help support them.

4.5   In addition, the Council hosted a [Schools Climate Conference](#) in November 2024 at which pupils from local secondary schools were invited to prepare proposals to speed up climate action and adaptation. There was much interest from the young people in the subject of youth engagement.

5   The NCLB Year of Youth Action

5.1   As only 18% of the young people felt that they were listened to by adults in Cheltenham, there is clearly more work to be done to ensure that their voices are heard and to ensure that engagement solutions are co-created with young people.

5.2   Therefore NCLB's Year of Youth Action 2025 will follow the three aims as outlined below across all engagements with young people.

        In Cheltenham, young people and adults will work together to:

- *Ask - Proactively engage with young people to hear their voices;*
- *Listen - Support organisations to actively listen to the views, concerns, and ideas of young people;*
- *Act - Take youth-led social action to shape our town and its future.*

5.3   The year will be a call to action for organisations that support young people directly and indirectly to come together to empower young people in the town and work with them to make Cheltenham a better place for them to grow up in and support them to strengthen our communities for everyone.

5.5   The Year of Youth Action was launched at the inaugural NCLB Showcase event on 30th January 2025. The event featured performances by young people, speeches from adult and young people experts on the issues facing children and young people in the town and provided networking opportunities for children, young people and partners of NCLB.

5.6   The 'In their own words: Young Voices in Safety and Protection in Cheltenham' report highlighted common themes as identified by young people in Cheltenham with clear recommendations for delivery focus; engagement and inclusion, safety in the community, recreation, mental health and wellbeing and digital safety and literacy.

5.7   Drawing on youth-led feedback from within the St Giles report and subsequent youth engagement, NCLB will engage with partners to produce a Year of Youth Action 2025 delivery plan.

6   Hear by Right Self-Assessment

6.1   Alongside the Year of Youth Action it is also proposed that the council should carry out a self-assessment against the National Youth Agency's Hear by right standards to support future engagement and Year of Youth Action delivery plan. Hear by Right is a free self-assessment framework which supports organisations to plan, develop and evaluate their participation practices. Created with young people, the framework seeks to empower children and young people to understand their rights and use their voice.

6.2   The framework comprises seven standards; strategy, structure, systems, shared values, style, staff and skills with 20 indicators that describe best practice, supporting organisations to plan, develop and evaluate their participation practices and provision. It fosters a culture of development; a continual journey for keeping young people at the heart of decision making.

We use the 7 S Model to Reflect on your organisation

Strategy: This is your organisation's plan for building, delivering and maintaining youth participation.

Structure: This is how your organisation is organised, exploring how departments and teams are structured and what structures are in place to support young people.

Systems: The systems in place to support operational delivery and underpin the procedures that staff use to get the job done.

Shared Values: These are the core values that uphold the organisation and reflect its general ethos and delivery.

Style: This is the style of leadership adopted, whether this is the bottom-up approach or top-down approach

Staff: Exploring the employees and their general competencies, role, skill set and delivery.

Skills: Exploring the actual skillset and competencies of the organization's employees.

The Hear by Right Framework

6.3   The Hear by Right self-assessment process will help the Council reflect on the current approach to youth participation, respond to the gaps identified and then reflect on the changes that need to made. Ultimately, the framework can be used to:

- Hold organisations accountable for the way they deliver and advocate for youth participation;

- Encourage development of more critical thinking and collaborative working;
- Create sustained meaningful outcomes for young people by the curation of more youth informed practice;
- Promote co-production and teamworking with young people;
- Help strengthen funding applications which require evidence of youth voice or participation.

6.4 It is anticipated that a full self-assessment and development of appropriate actions will take around 12 months and only after this time will there be a real understanding of how effective current engagement is, how it can be improved and whether a youth council or youth forum are something that young people really want.

7 Alternative options considered

7.1 There was consideration of setting up a youth council however from the feedback of the young people in the survey it is clear they want to be engaged with in a variety of ways including advisory boards and online solutions. It was felt that using the Hear by Right self-assessment, together with NCLB working with young people to test how impactful different methods of engagement are over the coming year would provide a more detailed insight into the most effective methods of engagement.

7.2 A longer-term proposal can then be brought forward that has the full support of local young people and is likely to include different engagement opportunities so a diverse range of young people can be engaged. The cost of setting up a traditional youth council currently would be prohibitive at this time as this would require additional officer time and running costs.

7.3 The option to do nothing was also considered. However as only 18% of young people who responded felt listened to by adults and young people's engagement in the community is so vital to those communities thriving this was not considered as an option.

8 Consultation and feedback

8.1 The youth survey report was presented to the NCLB Strategic Board who unanimously supported the concept of a Year of Youth Action. It has also been presented to the Children and Young People's County Coalition.

9 Key risks

9.1 The key risks associated with this recommendation are as follows:

- Capacity to manage the process;
- Lack of voice for young people and frustration with not being heard;
- Funding to sustain the process;
- If the financial costs for establishing and running a youth engagement mechanism exceed existing budgets, there is a risk that the council may not be able to commit to the preferred option.

Report author:
Richard Gibson
Head of communities, wellbeing & partnerships
Tracy Brown
Partnerships and Safeguarding Manager

Appendices:
Appendix 1 - Risk Assessment
Appendix 2 - Equality Impact Assessment – Screening – (to be included in all Cabinet and Council reports)
Appendix 3 - Climate Change Impact Assessment
Appendix 4 – In their own words – youth survey report

Background information:
Motion agreed by full council on 20 March 2023

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If there is insufficient capacity within the team to manage the year of youth action, it might not meet the expectations of the council and its partners.	Richard Gibson	2	3	6	Reduce	The year of action will be partnership-led and will not all fall on CBC to deliver. However, officers will keep plans for the year under review so that there is confidence that they can be delivered within existing staff resources.	Richard Gibson	ongoing
	If the council and its partners do not respond to the issues raised in the youth survey report, there might be some frustration expressed by young people with not being heard.	Richard Gibson	3	2	6	Reduce	Commitment to the year of action via this cabinet report, plus partner sign up via No Child Left Behind. Action has been taken to feedback to young people who contributed to the survey via the lead cabinet member.	Richard Gibson	
	If there is insufficient funding to meet partner ambitions for the year of youth action, then action will need to be taken to curtail activities to fit within existing service budgets.	Richard Gibson	2	2	4	Reduce	Keep plans for the year of action under review so that there is confidence that they can be delivered within existing service budgets.	Richard Gibson	

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the financial costs for establishing and running a youth engagement mechanism in the future exceed existing budgets, there is a risk that the council may not be able to commit to the preferred option.	Gemma Bell	3	3	9	Reduce	Consideration of likely costs of the option and early discussion with s.151 officer in terms of financial implications and the likelihood that a budget might be available.	Richard Gibson	October 2025

Appendix 2: Equality Impact Assessment (Screening)
STAGE 1 – Equality Screening

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

a. Person responsible for this EqIA	
Officer responsible: Tracy Brown	Service Area: Community, Wellbeing and Partnerships
Title: Safeguarding and Partnership Manager	Date of assessment:
Signature: THS Brown	

b. Is this a policy, function, strategy, service change or project?	Other
If other, please specify: Partnership Year of Action	

c. Name of the policy, function, strategy, service change or project	
NCLB Year of Action including Hear by Right standards	
Is this new or existing?	**new**
Please specify reason for change or development of policy, function, strategy, service change or project	
In a recent survey of young people only 18% of young people felt adults in the town listen to their views. They also raised concerns about a number of issues within the town	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	In Cheltenham, young people and adults will work together to: • Proactively engage with young people to hear their voices (Ask); • Support organisations to actively listen to the views, concerns, and ideas of young people (Listen); • Take youth-led social action to shape our town and its future (Act).
Objectives:	To work in partnership to deliver a set of actions under the following themes: • Mental Health and Wellbeing • Safety in the Community • Digital Safety and Literacy

	- Recreation - Engagement and Inclusion
Outcomes:	The year of youth action will deliver a range of outcomes across the five themes such as: - Organisations understand young people's mental health and wellbeing concerns and are better able to respond. - The views of young people from diverse backgrounds have influenced decision makers in community safety - Young people's views on online safety have influenced technology companies. - Young people have influenced the delivery of the Sport and Physical Activity Strategy - The 'In their own words' and 'Your experiences, your voice' reports will have been used by statutory, private and community sector organisations to inform their services and make Cheltenham a better place to live for all young people.
Benefits:	The year of youth action will mainly benefit young people 11-18 and the wider community

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**
Please provide an explanation for your answer:	
Engaging with young people benefits both them and the wider community including the quality of decision making and services	

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

f.   Identify next steps as appropriate

Stage Two required	**Yes**
Owner of Stage Two assessment	**Tracy Brown**
Completion date for Stage Two assessment	**4.10.24**

Please forward this completed form to [add email address] and move on to Stage 2 if required.

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation
The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a.   Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

A needs analysis undertaken by GCC on behalf of NCLB in 2023 highlighted that young people were struggling with their emotional wellbeing, maintaining friendships, and school attendance. In addition there is increasing concern about the vulnerability of many of the town's young people to criminal exploitation.

The needs analysis however recognises that it is difficult to break-down that statistics by the protected characteristics.

b.   Consultation

Has any consultation be conducted?	**Yes**

Describe the consultation or engagement you have conducted or are intending to conduct.
Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.
If no consultation or engagement is planned, please explain why.

A consultation was carried out with young people in July/August 2024. They were clear that they did not currently feel like their voices were heard. They wanted to have more influence in the Town. They also highlighted area of concern they had and ideas to solve these. The full report is an appendix to the Cabinet report.

3. Assessment

a. Assessment of impacts
For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).
Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Neutral	The proposal is not targeted at this age but may have an indirect impact of making their local area better	
	Younger People (16-25)	Positive	Young people 16-18 will benefit from feeling heard and influencing decisions in their community	
	Children (0-16)	Positive	Young people 16-18 will benefit from feeling heard and influencing decisions in their community	
DISABILITY A definition of disability under the Equality Act 2010 is available here. *See also carer responsibilities under other considerations.*	Physical disability	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Sensory Impairment (sight, hearing)	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Mental health	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence	

			decision making in their community.	
	Learning Disability	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
GENDER REASSIGNMENT		Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	The proposal is not targeted at this characteristic but may have an indirect impact of making their local area better	
	Men	Neutral	The proposal is not targeted at this characteristic but may have an indirect impact of making their local area better	
	Lesbians	Neutral	The proposal is not targeted at this characteristic but may have an indirect impact of making their local area better	
	Gay Men	Neutral	The proposal is not targeted at this characteristic but may have	

			an indirect impact of making their local area better	
PREGNANCY & MATERNITY	Women	Neutral	The proposal is not targeted at this characteristic but may have an indirect impact of making their local area better	
RACE* Further information on the breakdown below each of these headings, is available here. For example Asian, includes Chinese, Pakistani and Indian etc	White	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Mixed or multiple ethnic groups	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Asian	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	African	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence	

			decision making in their community.	
	Caribbean or Black	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
		Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
RELIGION & BELIEF** A list of religions used in the census is available [here](#)	See note	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
SEX (GENDER)	Men	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Women	Positive	Will have a positive impact for young people in this category as	

			they will have opportunity to have their voice heard and influence decision making in their community.	
	Trans Men	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Trans Women	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
SEXUAL ORIENTATION	Heterosexual	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Lesbian	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	

	Gay	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
	Bisexual/Pansexual	Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Positive	Will have a positive impact for young people in this category as they will have opportunity to have their voice heard and influence decision making in their community.	
Rurality i.e. access to services; transport; education; employment; broadband		Neutral	The proposal is not targeted at people in this category	
Other (e.g. caring responsibilities)		Positive	Will have a positive impact for young people in this category as they will have opportunity to have	

		their voice heard and influence decision making in their community.	

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
As the year of action develops we will ensure that we are finding ways to engage as many young people as possible with protected characteristics	**Ongoing from January 2025 until December 2025**	**Tracy Brown**

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.
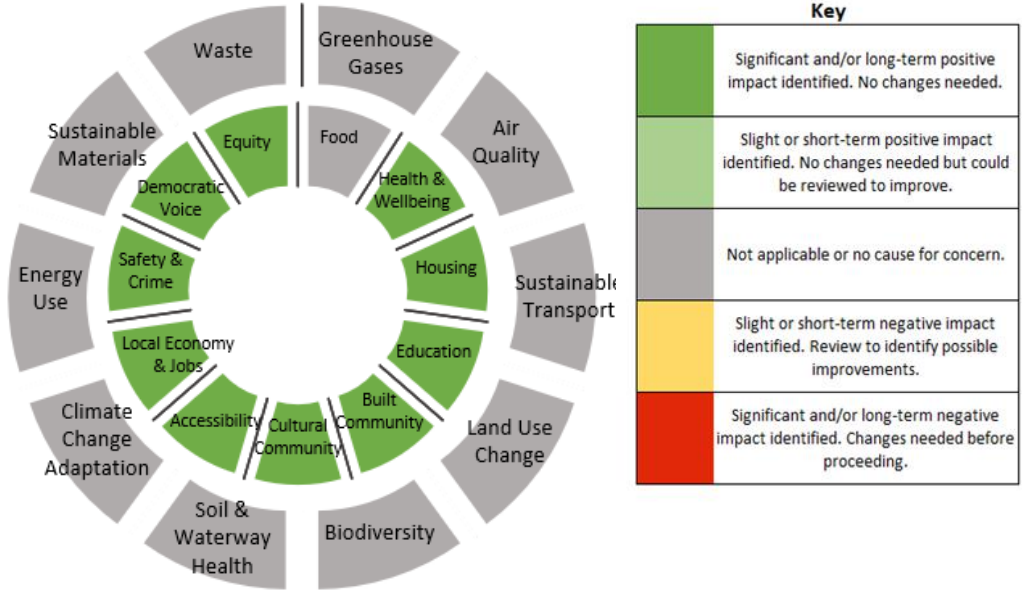
6. Change log

Name	Date	Version	Change
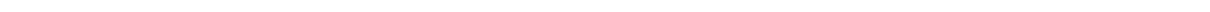
Appendix 3 – climate change impact assessment

Report: NCLB Year of Youth Action including signing up to the Hear by Right proposals

Environmental	Scores	Justification	Recommendation
GHGs	0	0	0
Air quality	0	0	0
Sustainable Transport	0	0	0
Land use change	0	0	0
Biodiversity	0	N/A	0
Soil and waterway health	0	N/A	0
Climate Change Adaptation	0	N/A	0
Energy Use	0	0	0
Sustainable Materials	0	0	0
Waste	0	0	0

Social	Scores	Justification	Recommendation
Food	0	N/A	0

Health	8	Youth engagement will increase the mental health and wellbeing of the young people. It will also allow them to influence decisions about services that impact them	0
Housing	4	Young people will have opportunities to have their views on housing heard and engage in problem solving around the issues	0
Education	4	Increased wellbeing and engagement with young people tends to have a positive correlation with school attendance. Their engagement will also lead to increased trust between young people and services including schools. It will also lead to informal education opportunities	0
Community	4	Youth social action projects will support a better build environment especially around green spaces	0
Culture	4	Youth engagement should encourage young people to be more engaged with their community as well as discover their own cultural capital	0
Accessibility	4	Young people can help identify and reduce barriers that may be face	0
Local Economy and Jobs	4	Young people will gain important transferable skills and work experience opportunities	0
Safety	8	It will reduce criminal exploitation and anti-social behaviour within the cohort of young people they work with. It should also make people feel safer in the local area as young people will be engaged in positive activity	0
Equity	4	Young people having a greater voice will help ensure the needs of the young people are met and it will ensure fairer treatment	0
Democratic Voice	8	Young people will be engaged with and their voice amplified to relevant partners as necessary	0

Appendix 4

In Their Own Words: Young Voices on Safety and Protection in Cheltenham

Principal Investigator: O.J Smart

St Giles

Forward

For all the young people who took part in our survey and for those who feel that they haven't been heard, for all the young people faced with the challenges of our world, for all their fears, their worries, for all their hopes and dreams, for all of the incredible individuals in Cheltenham doing amazing work by serving our young people and their communities….

This is for you

Contents

Executive Summary: Young Voices on Safety and Protection in Cheltenham

This report presents the findings of a comprehensive study on young people's perceptions of safety and well-being in Cheltenham. Commissioned by Cheltenham Borough Council and conducted by St Giles Trust, the research aims to inform the No Child Left Behind (NCLB) initiative and improve youth services in the area. The study, led by Principal Investigator O.J Smart, employed a mixed-methods approach to gather insights from Cheltenham's youth population.

Key Findings

1. **Voices of Young People**:

   o **Only 18% of young people felt their opinions were valued by adults and professionals**. Many expressed a desire for more direct communication platforms and greater action taken on their feedback.

2. **Perceptions of Safety**:

   o **Many young people reported feeling unsafe in specific areas of Cheltenham**, particularly at night. The town centre, Hesters Way, St. Paul's, and Whaddon were frequently cited as unsafe. Dark alleyways and parks, such as Pittville Park and Spring bank Park, were also areas of concern.

   o **Online, 47% of respondents had seen disturbing content, but only 18% felt comfortable reporting this to adults**.

3. **Youth Activities**:

   o Hanging out with friends in parks (32%) and the town centre (23%) were the most popular free-time activities. However, a significant number of young people cited a lack of affordable and accessible recreational spaces.

   o Sports, music, and creative arts were important to young people, but many felt there were not enough safe, well-maintained facilities for these activities.

4. **County Lines and Exploitation**:

   o **Cheltenham is vulnerable to County Lines** activity due to its proximity to larger cities and relatively small police presence. The report highlights that **as much as 20% of those involved in County Lines are children**, often exploited due to social and economic vulnerabilities.

5. **Digital Safety**:

   o **The increasing use of social media by young people poses significant risks**, including exposure to exploitative content and harmful interactions. Platforms like TikTok, Instagram, and Snapchat were commonly used, **but respondents felt ill-equipped to handle online threats**.

6. **Desired Improvements**:

   o Respondents called for increased police presence, better lighting in public spaces, more youth-oriented activities, and accessible mental health support.

Affordable recreational spaces and improved public safety measures were also top priorities.

Recommendations

1. **Enhanced Safety Measures**:

   o More visible policing in identified hotspot areas and improved lighting in parks and public spaces should be prioritised to address safety concerns.

2. **Digital Literacy and Safety**:

   o Schools and community organisations should implement digital safety education to equip young people with the skills to navigate online risks. Strengthening the Online Safety Act (2023) to hold platforms accountable for youth safety is also recommended.

3. **Youth Engagement and Inclusion**:

   o Cheltenham must create inclusive and transparent decision-making processes, where young people feel empowered and see tangible results from their participation. Initiatives such as youth advisory councils and participatory budgeting could help bridge this gap.

4. **Infrastructure for Recreation**:

   o Investment in youth-friendly recreational spaces, including sports facilities and creative arts centres, is essential. These spaces should be affordable and accessible to all young people.

5. **Mental Health Support**:

   o Expanding access to mental health services, including counselling and peer-support programs, will help address the emotional and psychological needs of young people.

By addressing these concerns and incorporating the voices of Cheltenham's youth, this report sets the foundation for more targeted and effective interventions aimed at improving safety, well-being, and inclusivity for young people in the area.

Introduction and Background

Cheltenham received funding for UK charity St Giles Trust to carry out a scoping piece of research to better understand young people's perceptions of safety within the area and to understand what they would want from any future provisions provided. The results of the research would feed directly into The No Child Left Behind (NCLB) initiative in Cheltenham, a community-driven program aimed at addressing child poverty and inequality. It was launched in response to findings that nearly 4,400 children in Cheltenham live in poverty and face significant challenges, including poorer educational outcomes, higher rates of school exclusion, mental health issues, and increased involvement with social services.

Junior Smart was elected as the Principal Researcher for the investigation owing to his extensive experience and qualifications in the field of youth justice, criminal exploitation, violence and desistence.

Research Aims and Objectives

The overarching aim of the investigation was to draw out and explore young people's perspectives of safety, both in the physical as well as in online spaces and in specific there were a number of key areas which the council wanted to be explored. These included:

- How do young people feel about their free time?
- Where do they go or hang out?
- What are they doing?
- Why do they do/go there?
- What is missing for them?
- Do they feel safe?
- Where do they feel safest?

In addition, the council wanted to know whether young people felt that they were being heard in all aspects of their lives and how their voice could be better heard by the arenas and services around them. There was a specific focus on having a solid representation from those aged 13 and above and other typically underrepresented groups when it comes to research involving the youth voice.

Background and Literature

Terminology

The term 'gang' remains a highly contentious subjective phrase, drawing and perhaps rightfully warranting more meaningful debate than what is required here[1]. Hallsworth and Young's typology characterises three distinctive groups: peer groups, street gangs or collectives and Organised Crime Groups (OCGs). The National Crime Agency (NCA) estimated there were 4,772 OCGs in the UK in April 2020. A quarter of these groups (around 1,200) were estimated to be involved in violent criminal activity. Other OCGs are involved in fraud, cybercrime, and immigration crime.[2]

However, part of the issue with typologies is that it can be challenging to discern where the understanding of 'gang' ends, and organised crime group begins because the terms are so loosely based. For the purposes of the research and report it is opted to simplify organised crime groups and street gangs as one and the same and consider it as co-offending groups who engage in criminal activity for "personal gain" be that drug dealing or enacting violence and the purposes of this investigation it is proposed that we view the matters of their involvement be that through exploitation or otherwise as mitigating factors.

County Lines

The impact of county lines is evident. Firstly, county lines activity has become characterised by gangs and with it the predication for violence and territory. Then there is the impact that an unwavering supply of drugs and other illegal commodities has on rural areas, many of which lack the policing capacity as their urban counterparts[3]. Then there are the harms associated with young and vulnerable people being groomed and exploited. Then there are the risks associated with the actual carrying and distribution of the drugs which includes health and criminal sanctions. Finally, there is the effect on the individual; county lines overlap with other forms of abuse and exploitation; therefore, it can lead to serious physical and emotional harm[4].

Data regarding the ages of those involved is concerning, the NCA state that at least 20% of those involved in county lines drug dealing were children with the average age of those caught being around 15 years of age [5]. The NCA maintain that county lines

---

[1] Harding, S. (2020). *County lines: exploitation and drug dealing among urban street gangs*. Policy Press.

[2] Havard, T. (2022). Serious youth violence: County lines drug dealing and the Government response.

[3] McLean, R., Robinson, G., & Densley, J. A. (2019). *County lines: Criminal networks and evolving drug markets in Britain*. Springer Nature.

[4] Wroe, L. E. (2021). Young people and "county lines": a contextual and social account. *Journal of Children's Services*.

[5] NCA, NPCC & ROCUs, NCLCC County Lines Strategic Assessment 2020/21,

are the most frequently identified form of coerced criminality with "at least 14.5%" of modern slavery referrals relating to county lines activity (NCA, 2021).

Thematic Trends of Involvement

Although anyone can become criminally exploited, academic research has been able to draw out the thematic trends around involvement with significant research evidencing the association between gangs and criminal activity and deprivation and low social mobility. Those involved are more likely to reside in areas of deprivation; have experienced victimisation; have psychological or emotional wellbeing issues such as low self-esteem; trauma or self-harm [6]. They are also likely to have experienced more than four Adverse Childhood Experiences (ACE's)for example:

- abuse, violence, and neglect
- alcohol or drug addictions either individually or in the family
- family members in prison
- experiencing the death of a loved one at a young age
- low self-esteem
- lack of positive role models
- having a close family member involved [7].

Furthermore, academic literature is congruent in its identification of motivating factors for those involved including amongst others, a sense of belonging, financial gain, support and a sense of identity, all of which can meet the deficits which would otherwise be gained from the family home or society.[89]

Cheltenham's Socioeconomic backdrop status

Cheltenham's socioeconomic backdrop is characterised by a mix of areas of affluence and areas of deprivation. As a Regency spa town, Cheltenham has long attracted an affluent population, with key sectors including finance, technology (especially due to GCHQ), education, and tourism, particularly with its renowned festivals. The town has historically low unemployment rates and a high proportion of residents with higher education qualifications, contributing to its economic vitality[10]

However, socio-economic studies in 2021 highlighted notable social disparities. ☐ Despite its affluence, Cheltenham is not immune to social and economic inequality. Certain wards within Cheltenham, such as St. Paul's and Hesters Way are

---

[6] Harding, S. (2014). The street casino: Survival in violent street gangs. Policy Press.

Havard, T. E., Densley, J. A., Whittaker, A., & Wills, J. (2021). Street gangs and coercive control: The gendered exploitation of young women and girls in county lines. Criminology & Criminal Justice, 17488958211051513.

[7] Wolff, K. T., Baglivio, M. T., Klein, H. J., Piquero, A. R., DeLisi, M., & Howell, J. C. (2020). Adverse childhood experiences (ACEs) and gang involvement among juvenile offenders: Assessing the mediation effects of substance use and temperament deficits. Youth violence and juvenile justice, 18(1), 24-53.

[8] Densley, J. (2013). How gangs work. New York, NY: Palgrave Macmillan,

[9] Firmin, C. (2010). Female voice in violence project: A study into the impact of serious youth and gang violence on women and girls. Race on the Agenda.

[10] https://www.ons.gov.uk/visualisations/censusareachanges/E07000078/

recognised as having higher levels of deprivation, with lower household incomes and challenges related to education and health. Property prices in Cheltenham are relatively high, driven by its desirability as a place to live and its proximity to both London and Birmingham. This has led to issues with housing affordability for some segments of the population, particularly young professionals and low-income families[11]. It is the researcher's view upon visiting the sites that the levels of poverty were intergenerational.

Initiatives such as "No Child Left Behind" (NCLB) aim to address these inequalities by supporting children from disadvantaged backgrounds, who face challenges such as poorer educational attainment and mental health. The NCLB initiative in Cheltenham has received praise for its proactive approach to addressing child poverty and educational inequality. It targets the nearly 4,400 children living in poverty within Cheltenham and aims to provide support across various areas such as mental health, education, and social inclusion[12].

However, critical analysis highlights several concerns. Some critics argue that while NCLB focuses on providing resources and opportunities, it risks treating poverty and inequality as isolated problems rather than addressing the broader structural and systemic issues that perpetuate them. Additionally, the program's heavy reliance on local partnerships and community engagement means that its success may be uneven, depending on the resources and capabilities of different local organisations [13]

---

[11] https://www.ilivehere.co.uk/statistics-cheltenham-gloucestershire-7858.html#google_vignette
[12] https://nclbcheltenham.org.uk/
[13] https://www.cheltenham.gov.uk/downloads/file/7729/cheltenham_needs_analysis_2019

Cheltenham and County Lines Activity

Several factors contribute to Cheltenham being a hotspot for county lines activity:

- **Location**: Cheltenham is strategically located near major cities like Birmingham and Bristol, making it an attractive hub for drug trafficking. Its proximity to the M5 motorway also facilitates easy transportation of drugs and people[14] [15].

- **Affluence**: Cheltenham is known for its affluent areas and thriving economy, which can provide a lucrative market for drug dealers. The demand for drugs among some of the town's wealthy residents may attract county lines gangs.

- **Educational institutions**: Cheltenham is home to several prestigious schools and colleges, which can be targeted by county lines gangs for recruiting young people as drug runners or dealers this is because these areas have transient populations and link with illicit recreational economies [16] [17]

- **Transportation links**: The town has excellent transportation links, including regular train services to London, Birmingham, and other major cities. This makes it easier for gang members to move between locations and transport drugs[15]

- **Vulnerable populations**: Like many other towns, Cheltenham has vulnerable populations, such as individuals struggling with poverty, family problems, or mental health issues. These people, particularly children and young adults, are at a higher risk of being exploited by county lines gangs [18] [19].

- **Established drug market:** Cheltenham has an established drug market, which may have attracted the attention of county lines gangs looking to expand their operations and take over existing drug territories [17].

- **Relatively Small Police Presence**: Smaller towns like Cheltenham tend to have fewer police resources compared to major cities. Criminal networks may see this as an opportunity to operate with less scrutiny or oversight from law enforcement [20].

- **Perceived safety**: The town's relatively low crime rates and perceived safety compared to larger cities might have given county lines gangs the impression that they could operate with less scrutiny from law enforcement.[20]

---

[14] Home Office Report on County Lines (2018)
[15] NCA Annual Strategic Assessment (2021)
[16] https://www.bi.team/wp-content/uploads/2020/02/BIT-London-Violence-Reduction.pdf
[17] Home Office Report on County Lines (2018)
[18] NYA Out of Sight (2020)
[19] The Children's Society – Counting Lives Report (2019)
[2020] Windle, J. & Briggs, D. (2019). "It's a no-go zone": County lines, vulnerable youth and police resource allocation. *Journal of Policing, Intelligence and Counter Terrorism.*

These factors, combined with the persistent demand for illegal drugs, have made Cheltenham a target for county lines activity, requiring ongoing efforts from law enforcement and the community to combat the problem.

Lack of Intervention Guidance

Within the arena of gangs, county lines or CCE, there is an apparent lack of evidence-based practice in terms of what works. Is it a matter of providing support to those vulnerable individuals or groups at higher risk of being groomed or does the solution lie in enforcement processes in such as stop and search and subsequently criminalisation. This continues to be a challenge for local authorities who are frequently left to come up with their own intervention and diversionary strands. Lead agencies or teams vary from locale to locale; those responsible could be children's services, social workers, police, or youth offending teams[21].

Research Methodology

The study adopted an inductive approach to the data, including site visits and focus group style meetings with stakeholders and service providers in the areas. This enabled the principal researcher to experience the locations first hand, draw observations and connect them with conveyed stakeholder experiences. This 'ground up' approach is recognised in academia has been used successfully by scholars such as Simon Harding (2014) in research into gangs and Kristin Ferguson (2011) in developing a set of recommendations for interventions involving homeless youth.

Research Design

Given that the investigation was draw out young people's perspectives it was the original intention of the researcher to engage with the youth voice or council; a formal body or organisation made up of young people, typically aged between 11 and 25, who represent the views and interests of their peers to local or national governments, organisations, or decision-making bodies. The primary aim of a youth council is to give young people a voice in public affairs, help influence decisions that affect them and promote active citizenship and most areas have them. However, in Cheltenham it was a notable omission, thus the approach took the form of establishing a Research Advisory Steering Group; a collective whose members were comprised of remarkable individuals working or delivering services in the area. These were people with direct contact with young people and were known for their work, subject matter expertise, perspectives and/or lived experience which would benefit the investigation. This method is well known within research especially those that attempt to reach and involve hard to reach groups for example mental health, sexual health and youth justice [22] [23].

---

[21] Child Safeguarding Practice Review Panel. (2020). It Was Hard to Escape: safeguarding Children at Risk from Criminal Exploitation.
[22] Nuffield Foundation (2019).
[23] Cane, F., & Oland, L. (2019)

The Advisory Group served as a 'critical friend' to support the research project. Its key responsibilities included offering impartial advice when required, assisting in the development of research questions, supporting the distribution and implementation of questionnaires, and potentially aiding in the organisation and execution of focus groups. This collaborative approach ensured the project benefited from external expertise and guidance throughout its various stages. The fact that the investigation had such a significant reach and met such a high standard was largely down to the efforts of the group.

Recruitment to the group was achieved via **snowball sampling**. Enquires were made to establish leaders in the field and these were personally approached by the principal researcher, these members were then asked who they considered would be beneficial for the group and these were also then approached. In the initial meeting all recruited members were then asked if felt any participants were missing from the collective These were also approached.

Over 30 meetings were held between the principal researcher and potential members. Ultimately the group consisted of 20 members in total with one member dropping out due to other commitments.

The finalised investigation took the form of anonymised questionnaires via Microsoft Teams and disseminated by way of the group members and partner agencies. Thanks to this approach, a total of 578 responses were received, which whilst not as substantial as the numbers acquired by Gloucestershire for the Pupil Wellbeing report for 2022 (24,077), remains a substantial sample size for a local youth study, providing a good basis for drawing meaningful conclusions about the perspectives and experiences of young people in Cheltenham. The large number of responses adds credibility to the findings and also allows for more nuanced analysis across different demographic groups.

Given that 25,800 is roughly the youth population in Cheltenham, 578 only represents 2.24% of the youth in the area. While this is a small proportion of the total, it is large enough to potentially identify statistically significant trends and differences among subgroups, which could be valuable for targeted policymaking and program development.

One thing that cannot be under-estimated as a key strength drawn from the research is the collective efficacy of the partnerships. These fantastic individuals pulled together to make this research possible.

Demographic Overview

This section presents an analysis of the demographic composition of the survey respondents, providing context for the subsequent findings and their applicability to Cheltenham's youth population.

Sample Size and Representation

The survey garnered responses from 578 young people residing in Cheltenham, constituting a substantial dataset for analysis. This sample size enables the identification of statistically significant trends and offers valuable insights into the perspectives of the town's youth.

Age Distribution

Analysis of the age distribution reveals a pronounced concentration in the early adolescent years:

11-12 years: 48.44% (n=280)
13-14 years: 32.01% (n=185)
15-16 years: 15.40% (n=89)
17-18 years: 1.73% (n=10)
10 years and under: 2.42% (n=14)

The significant representation of 11–14-year-olds (80.45% of respondents) provides robust data on this crucial developmental stage. Moreover, it meets the research requirements of having a solid representation from those aged 13 years and above. However, the underrepresentation of older adolescents (15-18 years) should be noted when interpreting the results and may indicate a need for targeted research with this age group.

Gender Distribution

The survey achieved a reasonably balanced gender representation:

● Male	222	
● Female	331	
● Non-binary	9	
● A gender not listed here	4	
● Prefer not to say	12	

38%

57%
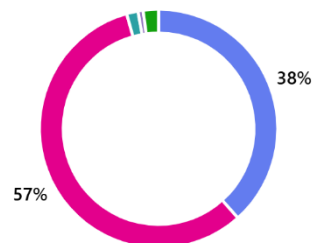
This diversity allows us to explore how experiences and perspectives might vary across different gender identities, providing valuable insights for inclusive policymaking.

Ethnic Diversity

The ethnic composition of respondents reflects Cheltenham's diverse population:
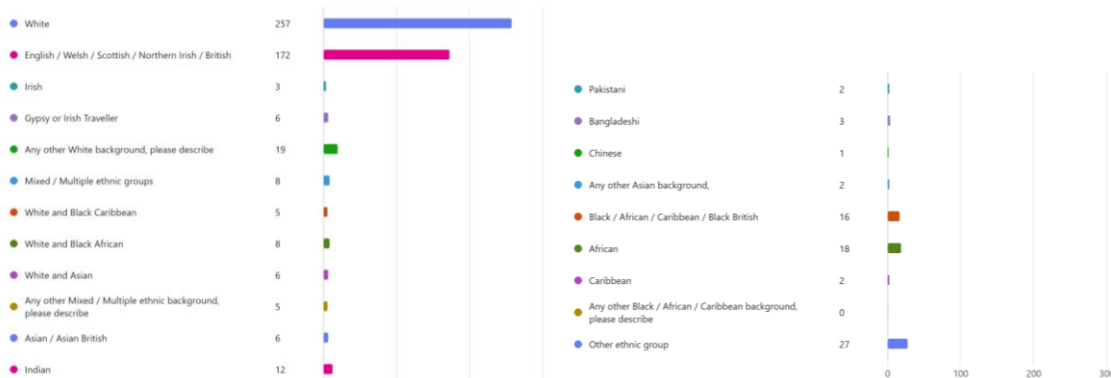
This diversity enables analysis of experiences and perspectives across various cultural backgrounds, although it should be noted that the proportion of White respondents is slightly lower than in Cheltenham's overall population (estimated at 85.7% in the 2021 census).

Geographic Distribution

Respondents represent a wide range of Cheltenham neighbourhoods, including but not limited to Hesters Way, St. Pauls, Whaddon/Oakley, Prestbury, Town Centre, Pittville, and Spring bank. This spread encompasses both more affluent neighbourhoods and areas facing socio-economic challenges, allowing us to explore how location within Cheltenham might impact young people's perspectives and experiences.

Youth Activities and Social Spaces

Respondents were asked about their preferred activities during free time. The most frequently mentioned activities were:

1. Hanging out with friends (mentioned by 62.3% of respondents)
2. Online activities (58.7%)
3. Sports and physical activities (45.2%)
4. Music-related activities (41.9%)
5. Art and creative pursuits (28.4%)

Other activities mentioned, though less frequently, included reading, dancing, and drama. Hanging out with friends emerged as the most popular activity among respondents, with over 60% mentioning this as a preferred way to spend their free time. This appears to underscore the importance of social connections for young people and highlights the need for suitable spaces where they can gather. Close behind were online activities, reflecting the significant role that digital spaces play in

youth culture today. Sports, music, and art also featured prominently, indicating a desire for diverse recreational opportunities.

Where do they go?

Young People were asked: When you are hanging out with your friends outside where do you go?

1. Parks were the most common cited place (185 mentions, 32.0% of respondents). Most commonly mentioned places included Spring bank Park, King George V (KGV), and Pittville Park.

2. Town/Town Centre was the next highest noted place (134 mentions, 23.2% of respondents), ranked in order of frequency:

   o The Brewery Quarter (including mentions of Hollywood Bowl within it)
   o High Street
   o Pittville
   o Montpellier
   o Coronation Square
   o St. Paul's
   o Hesters Way
   o Spring bank
   o Whaddon
   o Leckhampton Hill
   o Priors Park
   o Cheltenham Racecourse
   o Kings ditch
   o Fiddlers Green
   o Cleeve Hill (slightly outside Cheltenham proper)
   o The Honeybourne Line
   o Benhall
   o Arle Farm
   o St. Mark's

Additional observations:

   o "Town" or "town centre" was frequently mentioned without further specification, being one of the most common responses overall.
   o Some respondents mentioned general types of places within the town, such as shops, fast food restaurants (particularly McDonald's), cafes, the cinema, and bus stops.

3. Friends' Houses was also quite common (44 mentions, 7.6% of respondents)
   o Includes references to visiting friends' homes or each other's houses

4. Shops (37 mentions, 6.4% of respondents)
   o General references to shops or shopping areas

5.   Fast Food Restaurants (25 mentions, 4.3% of respondents)
     o   Predominantly mentions of McDonald's, with some other fast-food
            places

6.   No Outdoor Hangouts (22 mentions, 3.8% of respondents)
     o   Responses indicating, they don't go out or don't hang out with friends
            outside

Other notable locations mentioned include:

- Fields/Open Spaces (15 mentions, 2.6%)
- Walking Around (14 mentions, 2.4%)
- Specific Neighbourhoods (13 mentions, 2.2%)
- Cinema (5 mentions, 0.9%)
- Bowling (4 mentions, 0.7%)

Less frequently mentioned locations included the lido, restaurants, cafes, leisure centres, libraries, specific streets or roads, bus stops, and skate parks.

Taking it all into account, when it comes to physical spaces, parks stand out as the most popular hangout spots. Nearly half of the respondents mentioned parks, with Pittville Park, Spring bank Park, and King George V Playing Field receiving frequent mentions. The town centre also appeared to have a major appeal for respondents, attracting over 40% of young people surveyed. This preference for public spaces suggests that young people value areas where they can gather freely and without cost.

However, private spaces are also important, with a third of respondents mentioning friends' houses as preferred hangout spots. This could indicate a desire for more intimate, controlled environments, especially among those who might feel less comfortable or safe in public spaces.

Why Do They Go There?

Respondents provided various reasons for their choice of hangout spots. The most common reasons were:

1. Proximity and accessibility (mentioned by 37.2% of respondents)
   - "It's close to my home" or "It's easy to get to"
2. Fun and enjoyment (35.9%)
   - "Because it's fun" or "We enjoy spending time there"
3. Affordability (28.4%)
   - "It's free" or "We can afford to go there"
4. Social aspects (26.1%)
   - "It's where we can meet friends" or "Good place to socialize"
5. Lack of alternatives (18.7%)
   - "There's nowhere else to go" or "Not much choice in our area"
6. Safety and familiarity (15.3%)
   - "It feels safe" or "We know the area well"
7. Amenities and facilities available (13.8%)
   - "There are things to do there" or "Good facilities for our interests"

These responses support the view that many young people prefer locations close to home or easily reachable. This highlights the importance of having youth-friendly spaces distributed throughout Cheltenham, not just concentrated in the town centre. Fun and enjoyment are also key factors, reminding us that young people seek spaces that cater to their interests and allow for enjoyable experiences.

Affordability emerges as a significant consideration, with many respondents citing the free or low-cost nature of their chosen hangout spots. This suggests that financial constraints play a role in young people's choices and underscores the need for affordable or free recreational options in Cheltenham.

Interestingly, a notable portion of respondents mentioned a lack of alternatives as a reason for their choices, indicating that some young people feel limited in their options. This sentiment is echoed in the responses about desired improvements, where many expressed a wish for more youth-oriented spaces and improved recreational facilities.

Young People and Online Spaces

Young people were asked "Which of these do you use to talk to friends or watch videos?" the respondents indicated several platforms they commonly used for both purposes. From their responses it's evident that there is a strong usage of social media platforms and online services for communication and entertainment.
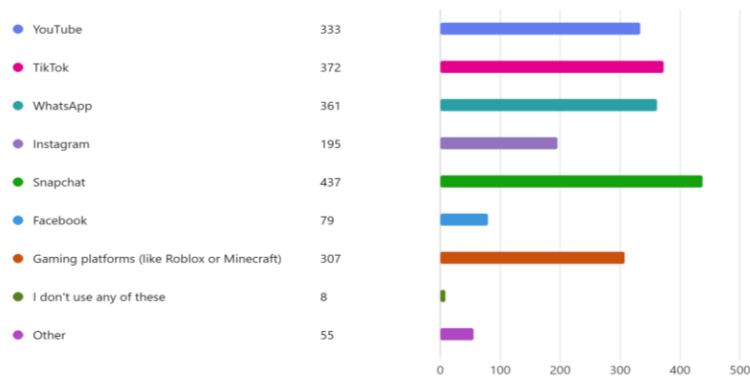
These include:

1. **YouTube** – This was frequently mentioned as a primary platform for watching videos, indicating its popularity among the respondents for consuming content.

2. **Instagram and Snapchat** – These platforms are primarily used for communication with friends, especially through messaging and video-sharing features.

3. **TikTok** – Many respondents mentioned TikTok as a go-to platform both for entertainment and, at times, to communicate with friends through shared content.

4. **WhatsApp and Facebook Messenger** – For more direct communication, some respondents mentioned using these messaging services.

5. **Gaming Platforms** – In addition to social media, some respondents mentioned using gaming platforms to talk to friends while playing games, suggesting that gaming is also a social activity for many respondents.

It is important to raise that these digital environments, whilst designed for benign social interaction, have each been implicated in various exploitative practices. Numerous reports such as the NCA report on county lines (2021)[24] and Children's Society[25] have identified several recurring issues across these platforms that contribute to their misuse:

1. **Anonymity**: The capacity for users to obscure their true identities on these platforms is frequently exploited by malevolent actors. This anonymity enables perpetrators to initiate unsolicited communications and entice vulnerable

---

[24] https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines
[25] https://www.childrenssociety.org.uk/what-we-do/our-work/child-criminal-exploitation-and-county-lines/what-is-county-lines

youth into high-risk activities, particularly those related to County Lines operations.

2. **Susceptibility to Psychological Manipulation**: These platforms provide a medium through which perpetrators can establish false rapport and exploit the psychological vulnerabilities of users, particularly those experiencing social isolation or seeking validation. This manipulative process can culminate in the exploitation of young individuals for illicit activities, including drug trafficking within County Lines networks.

3. **Inadequate Regulatory Measures**: Despite the implementation of certain safeguarding protocols, there remains a pervasive concern regarding the insufficiency of protective measures employed by these platforms to shield young users from potential harm.

These identified issues underscore the urgent necessity for enhanced regulatory frameworks and ultimately this is where arguably accountability has fallen short as it is a question whether the new **UK Online Safety Act 2023** is doing anything to mitigate the exploitation risks inherent within these platforms.

What Worries Young People

Young people were asked what things they worry about the most and were allowed to choose four categories from a broad selection of answers including 'other'

When asked what they worry about most, the respondents, primarily born between 2008 and 2012, painted a complex picture of their inner lives.

Category	Value
My education	227
Making friends	106
Family	156
Health	149
The environment	45
Bullying	114
Safety in my neighbourhood	70
Having enough money	137
The future	243
Looking different from others	93
Not fitting in	226
I don't worry about any of these things	83

Education emerged as a dominant concern for many of these young people. The frequency with which "My education" was mentioned suggests a keen awareness of the importance of academic performance in shaping their future prospects.

This focus on education is closely tied to another prevalent worry: the future itself. Many respondents expressed anxiety about what lies ahead, indicating that even at their young age, they are acutely conscious of the challenges and uncertainties that await them in adulthood.

Family concerns also featured prominently in the responses. The specific nature of these family-related worries wasn't detailed, but their prevalence hints at the significant role that family dynamics play in the emotional lives of these young people. It's possible that these concerns range from worries about family relationships to concerns about family members' well-being or stability.

Health was another common worry, demonstrating that these young individuals are not only thinking about their current well-being but also potentially about long-term health issues. This health awareness might be influenced by broader societal discussions or personal experiences within their families and communities.

The social sphere is clearly a significant source of anxiety for many respondents. "Not fitting in" was a frequently mentioned concern, highlighting the importance of peer acceptance and social integration during these formative years. Related to this, many young people worried about making friends and bullying, further emphasizing the central role that social relationships play in their lives and well-being.

Financial concerns were also present, with some respondents worried about "having enough money." This suggests an awareness of economic pressures, possibly reflecting their families' financial situations or broader economic uncertainties.

Interestingly, while mentioned, environmental concerns were less prominent than other worries. This could indicate that while young people are aware of environmental issues, more immediate personal concerns take precedence in their daily thoughts.

It's important to note that the responses weren't uniform. Many young people selected multiple worries, indicating the complex and interconnected nature of their concerns. Some respondents added personal worries not included in the predefined list, such as concerns about specific family members or teachers, showing the individual nature of their experiences.

Conversely, a minority of respondents indicated that they don't worry about any of the listed items. While this group was smaller, it's a reminder that not all young people experience the same levels of anxiety or concern.

Navigating Help: Where Today's Youth Turn for Support

Young people were asked in the survey **"Where would you go for support/help if you needed it?"**

The table below shows their responses

Source	Count
Parent or guardian	326
Other family member (like a grandparent or older sibling)	37
Friend	95
Teacher	20
School counselor	3
Doctor or nurse	1
Youth worker	4
Police officer	10
Helpline or online chat service	8
I'm not sure who I would go to	42
Other	32

---
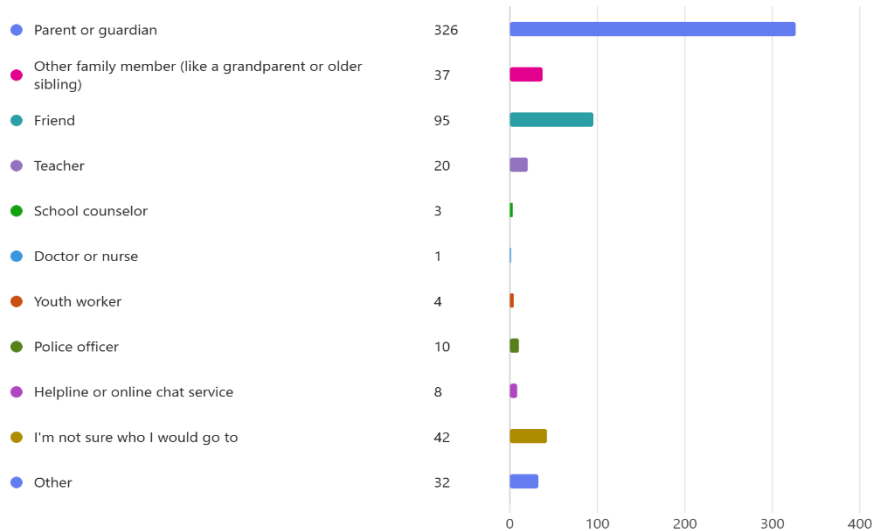
1. Family

The most frequently mentioned source of support was family members, with many young people expressing trust in their parents, siblings, or other close relatives when they needed help or advice.

- **Parents**: Parents were the first choice for a large number of respondents. Many felt they could confide in their parents about a range of issues, from personal problems to school-related stress.

- **Siblings**: Some young people mentioned turning to their siblings for support, especially for issues they felt more comfortable discussing with someone closer to their age.

- **Extended Family**: A smaller number of respondents mentioned other family members, such as grandparents, aunts, or uncles, as trusted sources of support.

Family remains a crucial pillar of support for most young people, reflecting the importance of strong family relationships in fostering emotional well-being.

---

2. Friends

Friends were another key source of support for many respondents, particularly for personal and emotional issues.

- **Peer Support**: Young people frequently mentioned that they would go to friends for advice or just to talk when they were feeling stressed or anxious. Friends were especially important for discussing topics they might not feel comfortable sharing with adults.

- **Social Circles**: For some, their social circle at school or in the community was a major source of comfort and security when dealing with problems.

Friends provide an important support system for young people, especially in areas like emotional well-being and social pressures. This reflects the significance of peer relationships during adolescence.

---

3. Teachers and School Staff

For certain issues, such as academic stress or bullying, many respondents indicated that they would turn to teachers, counsellors, or other school staff.

- **Trusted Teachers**: Some young people identified specific teachers they felt comfortable approaching for support, particularly in times of academic or social difficulties.

- **School Counsellors**: School counsellors were mentioned by some respondents as helpful sources for discussing both personal issues and school-related stress.

Schools are seen as a supportive environment by some young people, particularly when trusted teachers or counsellors are available. This underscores the importance of having approachable and empathetic staff within schools.

---

4. Community Resources/Authorities

Some respondents noted that they would turn to community resources or authorities for help.

- **Community Centres**: A small number of young people mentioned using local community centres or youth services when they needed assistance or guidance.

- **Police/Authorities**: For issues related to safety or legal concerns, a few respondents said they would turn to the police or local authorities.

Analysis: While fewer respondents mentioned these sources, community centres and authorities are still seen as vital resources for those who need them, particularly in cases of safety concerns.

---

5. Online Resources

A portion of respondents said they would seek help or information online. This reflects the growing reliance on digital resources, particularly among young people.

- **Trusted Websites**: Some mentioned turning to trusted websites or forums to seek advice, especially for issues related to mental health or well-being.

- **Social media**: A few respondents indicated that they would reach out to online communities or friends via social media for support or information.

The increasing use of online platforms for seeking support highlights the need to ensure that young people have access to safe, reliable, and accurate online resources.

6. Barriers to Seeking Support

While most respondents had clear sources of support, a small yet significant number (6.9%) expressed uncertainty reluctance or discomfort about seeking help.

Here a reoccurring phrase was **"I'm not sure who I would go to"**

This indicates that whilst many young people have access to support networks, some young people still may **feel alone** in terms of **problems or issues** they may face and may benefit from **increased awareness** of **available resources** or **encouragement** to seek help when needed.

7. Healthcare Professionals

For physical or mental health concerns, some respondents said they would seek help from healthcare professionals such as doctors or therapists.

- **Doctors**: For physical health issues, many respondents indicated they would visit their general practitioner or another medical professional.

- **Mental Health Professionals**: A few respondents specifically mentioned seeking out therapists, counsellors, or other mental health specialists for emotional support or when feeling overwhelmed.

Healthcare professionals are viewed as critical sources of support, particularly for issues related to physical and mental well-being. This highlights the importance of ensuring that young people have access to healthcare services.

Conclusion

The responses to **Question 12** reveal that family and friends are the most trusted sources of support for young people in Cheltenham, followed by school staff, online resources, and healthcare professionals. However, a small number of respondents were unsure of where to go for help, suggesting the need for greater awareness and

accessibility of support services. Schools, community centres, and healthcare professionals can play a crucial role in ensuring that all young people know where to turn when they need assistance.

Assessing Youth Representation : Do Young People Feel Heard?

Question 17 of the survey asks, "Do you feel that your opinions/ideas have an impact in decisions that are made?" The table below shows the breakdown of responses:

● Yes	103
● No	266
● Unsure	209

- **No**: 266 respondents (indicating they feel their ideas do not have an impact).

- **Unsure**: 209 respondents (indicating uncertainty about whether their opinions have an impact).

- **Yes**: 103 respondents (indicating they feel their ideas do have an impact).

Though a minority (18%) feel their voices are heard, the overall sense of youth influence remains low. Young people may want to engage but feel the process is superficial or their impact is limited.

Implication: Engagement processes need to be more authentic and empowering, where young people see tangible results from their contributions.

Without addressing these concerns, young people may become disengaged from civic life, leading to future challenges in fostering active participation. This could result in long-term disconnection from decision-making processes.

It is a recommendation of the report that Cheltenham must create inclusive, transparent opportunities for youth participation to prevent alienation and ensure continued engagement.

Enhancing Youth Engagement: How Adults and Professionals Can Better Listen and Respond to Young Voices

Question 18 asks "What can adults and professionals do to listen to you more?" Whilst many respondents expressed uncertainty or a lack of concrete ideas, several proposed clear solutions for improving communication and ensuring their voices are heard and respected.

Key Themes

1. **Active Listening:** A common suggestion was the need for adults to genuinely listen to young people, rather than dismissing or ignoring their opinions.

    o **Responses**:

       ▪ "Actually, listen and not just say yeah for the sake of it."

       ▪ "Stop talking over me and listen to what I'm trying to say."

       ▪ "Listen to us when we are in need."

2. **Creating Direct Communication Platforms:** Respondents expressed a desire for more structured and direct ways to communicate with adults and professionals. Many suggested forums, surveys, and voting mechanisms that would allow them to express their views on important issues.

    o **Responses**:

       ▪ "Have voting things at school so they can vote for things that they feel is necessary."

       ▪ "Visit schools and hold one-to-one meetings with students, with everything confidential."

3. **Taking Action on Feedback:** Several respondents emphasised the importance of not only listening but also taking concrete action based on their feedback. There is a desire for follow-through on the ideas and suggestions provided by young people.

    o **Responses**:

       ▪ "Actually, do what I say instead of agreeing and then forgetting."

       ▪ "Enforce it to action."

4. **Respect and Trust:** Many respondents highlighted the need for adults to respect young people's opinions and treat them with trust and maturity. They want their ideas to be taken seriously and not dismissed due to their age.

    o **Responses**:

       ▪ "Take us seriously."

       ▪ "Treat us more like adults with respect."

▪ "Trust us."

Common Challenges

- **Uncertainty and Lack of Solutions**: A significant number of respondents (e.g., "idk," "I don't know") expressed uncertainty about how adults and professionals could better listen to them. This may suggest a broader issue of disengagement or a lack of experience with effective communication channels.

Young People and Safety

Perceived Safe and Unsafe Areas

A notable pattern emerged in the respondents' perceptions of safe and unsafe areas in Cheltenham. While many young people reported feeling generally safe in their local areas, certain places were frequently cited as areas of concern, these were:

1. Town Centre/Town: This was the most frequently mentioned area, with many respondents specifically noting it feels unsafe at night.

2. Hesters Way: This area was mentioned often, coming in as the second most common response.

3. St. Pauls: Another frequently mentioned area where respondents reported feeling unsafe.

4. Whaddon: This area was also noted by several respondents as feeling unsafe.

5. Spring bank: Mentioned by some respondents, though less frequently than the above areas.

6. Parks (in general): Some respondents mentioned feeling unsafe in parks, especially at night. Specific parks mentioned included Pittville Park and Spring bank Park. The same park that many young people choose to spend their time.

7. Alleyways/Dark streets: Many respondents mentioned feeling unsafe in poorly lit areas or alleyways, regardless of the specific neighbourhood.

8. "Unfamiliar areas": A number of respondents noted feeling unsafe in areas they don't know well.

Other responses included:

- Feeling unsafe at school or near their school.
- A few respondents mentioned feeling unsafe "everywhere" or "anywhere at night".
- Some respondents mentioned feeling unsafe near pubs or areas where there are often intoxicated people.
- A significant number of respondents answered, "I don't know" or "Nowhere", indicating they either couldn't identify a specific unsafe area or generally felt safe in Cheltenham.

It's important to note that perceptions of safety varied among respondents. An area that one respondent found unsafe might be considered safe by another, often depending on their familiarity with the area or personal experiences. The safety both inside and outside of school warrants further attention as there is substantial evidence (see work by The Children's Society (2018), The Children's Commissioner for England (2019) and Firmin, (2020)) supporting the occurrence of grooming for Child Criminal Exploitation (CCE) in and around schools. Research shows that perpetrators often target vulnerable children within educational settings, using tactics such as manipulation, coercion, and the exploitation of peer networks. County lines operations, in particular, have been identified as a key form of CCE that begins in schools and extends beyond them.

What Young People are Concerned About

Young people were asked what the three most important things were that other young people living in the area should be worried about. The survey allowed respondents to choose up to three options from a predefined list, The table shows a breakdown of the responses:

The most frequently stated issues include:

- Pressure to try drugs or alcohol (cited by 42.7% of respondents)
- Unsafe places in the neighbourhood (38.9%)
- Peer pressure to engage in risky behaviours (36.2%)
- Strangers online (33.6%)
- Getting into fights or physical confrontations (31.8%)

There were also several other highlighted options selected:

1. Unsafe places in the neighbourhood: Many respondents identified this as a concern, suggesting awareness of potential physical dangers in certain areas.

2. Strangers online: This option was frequently chosen, reflecting concerns about online safety and interactions with unknown individuals on the internet.

3. Not knowing who to trust: This option was chosen by many, suggesting issues around trust and relationships are important to young people.

4. Being bullied: While not as frequently selected as some other options, bullying was still identified as a concern by a notable number of respondents.

5. Unsafe roads or traffic: This was selected by some respondents, indicating awareness of road safety issues.

6. Feeling left out or lonely: While not among the top concerns, this was still chosen by a number of respondents, highlighting social and emotional challenges.

7. I don't think there's anything to be careful about: A small number of respondents chose this option, suggesting they generally feel safe and unconcerned.

Experiences of Safety of Young People in Cheltenham

Question 13 in the survey, attempted to solicit further information from the young people by asking them to respond to a set of statements related to personal safety and their experiences within the community. These statements explored the influence of peer pressure, perceptions of safety in certain areas, and the carrying of protective items.

---

1. "I have gotten in trouble because of something someone else got me to do?"

This statement explores the extent to which young people feel that their actions have been influenced by others, leading to trouble. The responses were quite evenly divided:

- **308 respondents (53%)** indicated that this statement was **untrue**, meaning they had not been in trouble due to someone else's influence.

- However, **270 respondents (47%)** said this was **true**, showing a significant portion of young people feel they have been led into trouble by others.

This near-even split highlights the importance of peer influence in the lives of young people. It suggests that nearly half of the respondents feel vulnerable to being pressured into negative situations. The data implies a need for programs that help young people build resilience against peer pressure and make independent, positive choices.

---

2. "There are places within Cheltenham that I wouldn't go, especially at night?"

This statement sheds light on young people's perceptions of safety in different areas of Cheltenham, particularly at night but was also to cross reference a similar question earlier on in the survey:

- **506 respondents (88%)** agreed that there are places in Cheltenham they avoid, especially after dark.

- Only **72 respondents (12%)** said this statement was untrue, indicating they felt comfortable going anywhere in the town.

The overwhelming majority of young people avoid certain areas at night, suggesting concerns about safety in specific parts of Cheltenham. This response indicates the need for improved lighting, policing, or community safety measures in the areas that are perceived as unsafe. Further community engagement could help identify the specific locations where young people feel most vulnerable.

---

3. "I know people that have carried something in order to protect themselves?"

This statement addresses whether young people are aware of peers carrying objects, such as weapons, for self-protection:

- **358 respondents (62%)** said this was **untrue**, meaning they do not know anyone who has carried something for protection.

- **220 respondents (38%)** agreed that they know someone who has carried a protective item.

Whilst the majority of respondents reported that do not know anyone who carries protective items, the fact that 38% do suggests that a significant portion of the youth community is aware of peers engaging in this behaviour. This is a concerning statistic, indicating that almost 2 in 5 young people (who took part in the survey) are aware of others resorting to protective measures, which could imply a perceived or real threat of violence or danger in their environments.

---

4. "I have carried something myself in order to protect myself?"

This statement explores whether young people have personally carried an object for protection:

- **475 respondents (82%)** indicated that this was **untrue**, meaning they have not carried anything for protection.

- **103 respondents (18%)** admitted that they had carried something for their own protection.

Whilst the majority of young people have not carried protective items, it is concerning that nearly 1 in 5 respondents feel the need to do so. This suggests that a notable minority of young people feel unsafe to the point where they resort to carrying objects for self-defence. This could reflect deeper issues within the community regarding safety and security.

Young People's Perceptions of Online Safety

Question 20 of the survey, attempted to solicit information from the young people in relation to online safety by asking them to respond to a set of statements related to what they might have seen online **and** whether they had reported these concerns to adults. They were invited to respond with either: 'Over the last few weeks', 'Over the last couple of months', 'Over the last year or more' or 'I have not seen anything.' These were the responses we received:

Social Media-Related Questions Analysis

1. "I have seen things online that have shocked, scared, or bothered me?"

- **Responses**:
    - **254** said, "I have not seen anything."
    - **111** indicated that they had seen such things **over the last year or more**.
    - **110** said they had experienced these things **over the last couple of months**.
    - **103** responded that they had seen concerning content **over the last few weeks**.

The data shows that nearly half of the respondents have encountered disturbing content online, with many experiencing this in recent months. The fact that so many young people report seeing shocking or scary content over time reflects the ongoing nature of online safety concerns among youth. While many have not encountered such content, a substantial proportion are vulnerable to potentially harmful experiences.

2. "I have seen things online involving people or places in Cheltenham that have shocked, scared, or bothered me?"

- **Responses**:
  - **304** said, "I have not seen anything."
  - **97** indicated that they had seen this content **over the last year or more**.
  - **94** said they had seen it **over the last couple of months**.
  - **83** said they had seen this kind of content **over the last few weeks**.

While more than half of respondents had not seen concerning content specifically related to Cheltenham, a significant number had experienced disturbing material involving local people or places. This suggests that some youth in Cheltenham are exposed to online content that directly impacts their sense of local safety and well-being, which can be particularly troubling for those involved in the community.

---

3. "I have told adults about things I have seen online that have scared or worried me?"

- **Responses**:
  - **360** said, "I have not seen anything."
  - **95** reported that they had shared their concerns with adults **over the last year or more**.
  - **65** had shared concerns **over the last couple of months**.
  - **58** had told adults about these issues **over the last few weeks**.

While the majority of respondents either had not seen anything alarming or had not spoken to adults about it, there are still a notable number who have reported concerning content to adults. This shows that although young people are encountering troubling material online, many are not raising these issues with trusted adults, potentially indicating a gap in communication or a reluctance to share concerns.

Enhancing Safety: Young People's Perspectives and Solutions

Youth-Led Strategies for Safer Spaces

When asked in the survey, **"What would help you feel safer in your local area?"** young people responded with numerous suggestions about what could be improved:

1. Increased Police Presence

Many respondents indicated that a greater police presence or more community support officers (PCSOs) in their local area would help them feel safer.

- Specific Areas: Locations like Hesters Way, St. Paul's, and Spring bank were frequently mentioned as areas where young people would feel safer with more police patrolling.

2. Improved Street Lighting and CCTV

Better infrastructure, particularly improved street lighting and more CCTV cameras, was a common request to enhance safety.

- Street Lighting: Many young people felt that certain public spaces, especially parks and alleyways, were unsafe due to inadequate lighting, particularly at night.

3. Reducing Anti-Social Behaviour

Respondents consistently mentioned that reducing anti-social behaviour would significantly improve their sense of safety.

- Crime and Violence: Many highlighted the need to address specific issues such as drug dealing, gang violence (there were references to 'road men'), and fights in their neighbourhoods. There was a call for interventions to remove dangerous individuals from these areas.

- Weapons and Violence: Some young people mentioned concerns about individuals carrying weapons, particularly knives. They suggested measures such as stop-and-search efforts to mitigate the threat of violence.

4. Safer Public Spaces

Public spaces such as parks, town centres, and alleyways were often identified as areas where safety improvements were needed.

- Parks and Squares: Several respondents expressed concerns about the safety of parks and squares, particularly during the evening or when there were fewer people around. They proposed creating safer environments by reducing anti-social activities in these areas.

- Local Landmarks: Specific places, such as Coronation Square, were frequently mentioned as areas where young people felt unsafe.

5. Support Networks and Trusted Adults

Some respondents emphasised the importance of knowing there are trusted adults or community support networks available in their area.

- Trusted Adults: Having access to adults they could trust or contact for help, such as teachers or family members, was noted as an important factor for feeling safe.

- Community Support: A few respondents mentioned the need for better community support, suggesting that having a visible network of people they could rely on in their area would contribute to their sense of safety. The sense of **belonging** and **support** from the **local community** was an important factor for some young people. A few respondents mentioned that knowing more people in their community and having friendly interactions with neighbours would help them feel safer

6. Concerns About Nighttime Safety

A common theme in the responses was the increased sense of vulnerability during the evening or at night.

- **Night-time Safety:** Many young people mentioned they felt unsafe walking alone or being in public spaces after dark. They expressed a need for better lighting, more patrols, and improved general safety measures to address this concern.

7. Other Suggestions

- **Personal Security Measures**: Some respondents mentioned carrying personal protection items, such as **self-defence keychains** or feeling safe by walking with **trusted friends or family members**.

- **Community Awareness**: A few suggested that having **more security or neighbourhood watch groups** would help monitor and prevent crime in their areas.

The feedback from young people in Cheltenham demonstrates that safety concerns are widespread, particularly in certain areas like Hesters Way and St. Paul's. Respondents frequently called for more police presence, better lighting, and CCTV, along with efforts to reduce anti-social behaviour and make public spaces safer. Addressing these issues through community engagement, policing, and infrastructure improvements could significantly enhance the safety and well-being of young people in Cheltenham.

Digital Guardians: Youth Solutions for Online Safety

The survey posed a crucial question to young respondents: **'What could adults do to keep you safer online?'** The responses yielded a rich tapestry of insights, illuminating the digital landscape's vulnerabilities as perceived by young people. These valuable suggestions, emanating directly from those most affected, cover a diverse range of online safety concerns. Put into themes, they offer a unique lens through which to view and address online safety:

1. Increased Education and Guidance

Several respondents emphasised the importance of adults providing more education and guidance regarding online safety. They expressed a desire to understand better how to avoid risky behaviours and situations online, particularly regarding interacting with strangers and avoiding scams or online threats.

- **Example Response**: "More education on security measures would help." This sentiment underscores the need for formal and informal educational interventions from adults to help children navigate the complexities of the online world.

2. Active Monitoring and Involvement

A recurring theme was the request for more active involvement from adults in children's online lives. Respondents mentioned that parents, guardians, or trusted adults should take a more hands-on approach in monitoring their online activities and being available to provide guidance when needed.

- **Example Responses included**: "Having adults around more and monitoring what we do online would make us feel safer." "Mum to check in on me more often"
  This response suggests a preference for increased adult supervision as a way to ensure a safer environment.

3. Technological Solutions

Several young respondents mentioned that they believe technological tools and platforms could be improved to offer more protection. They highlighted the need for advanced security settings and tools that are more user-friendly and proactive in protecting them from harmful content or individuals.

- **Example Responses included**: "Better filters and software to stop people from contacting us or showing us things, we don't want to see." "Apps that block stuff"
  This shows that respondents are aware of the need for improved digital infrastructure that could act as a protective barrier.

4. Creating Clear Boundaries

Respondents often stated that adults should help establish clear rules and boundaries for online use. This included educating children about what is appropriate and what is not, especially regarding interactions with strangers online.

- **Example Response**: "They should tell us not to talk to strangers and help us set boundaries about what to share online."
  This response reflects a recognition of the importance of adult intervention in creating a safer online environment by teaching children how to set personal boundaries.

5. Collaborative Safety Efforts

Some respondents wanted more community-wide efforts where adults and children could work together to improve online safety. This could include group discussions, peer education, and workshops where both adults and children are involved in learning about the risks and how to protect themselves.

- **Example Response**: "We should work with adults to come up with solutions to keep us safe online."
  This indicates that young people see value in being part of the conversation about their own safety.

In summary, respondents believe that adults can play a critical role in keeping them safe online by providing education, monitoring their online activities, implementing technological solutions, and setting clear boundaries. They also value collaboration between adults and children in efforts to create safer online spaces.

Cheltenham's Future: What Young People Want More Of

In our survey, we posed the question to young recipients: 'What do you wish there was more of for young people in Cheltenham?' Their responses have been analysed and grouped into key themes. These themes illuminate the shared desires and perceived gaps in resources and opportunities for Cheltenham's youth. By examining these categories, we gain valuable insights into what young people believe is missing or insufficient in their local environment, providing a roadmap for potential improvements and initiatives.

1. Safety and Protection

One of the most prominent themes in the responses was a need for safer spaces. Many young people expressed concerns about their safety when spending time in public places. The request for **"safe places"** and **"protection"** was repeated multiple times. This includes the desire for safe parks, spaces free from antisocial behaviour, and areas where they don't feel threatened by **"unsafe drivers"** or **"bullies."**

- **Example responses**:
  - "Safe places to hang out."
  - "Places to go where you won't get bullied by 7-year-olds."
  - "More people able to protect and teach young people."
  - "Safer areas and less to no knives."

2. Leisure Activities and Youth Clubs

Another strong theme was the need for more recreational activities and social spaces where young people can enjoy themselves and bond with others. They expressed a desire for a range of activities, including youth clubs, sporting facilities, and **"fun places"** such as **"gaming arcades"** and **"fun parks."** Youth clubs were particularly mentioned as important places where they can meet others in a safe environment.

- **Example responses**:
  - "More leisure activities like ice skating, more youth clubs."
  - "Fun parks, carnivals."
  - "Places to go to hang out with friends in different areas."
  - "More football pitches as they take down the goals sometimes."

3. Affordability and Accessibility

The affordability of activities was a significant concern. Many respondents voiced frustrations over the high cost of entertainment options in Cheltenham. There was a clear call for more **"cheap shops"** and **"cheaper activities"** that allow young people to participate without financial strain.

- **Example responses**:
  - "Activities to do that aren't super expensive."
  - "Cheap shops because I'm broke."
  - "Cheaper places to go out with friends."

4. Support Systems and Emotional Well-being

Several responses highlighted the need for better emotional support systems. Young people mentioned a lack of access to **mental health resources** and **therapy**, and some suggested the need for places where they can receive help when they feel vulnerable or upset. The call for **"youth clubs and actual therapy"** indicates a gap in mental health support services that cater specifically to their needs.

- **Example responses**:
  - "Youth clubs and actual therapy."
  - "A place they could go for help."

o "More help if you are sad."

5. Socialisation and Friendship Opportunities

Social connection was another key theme. Young people wish for more spaces where they can meet others, build friendships, and socialize. Several expressed a longing for opportunities to meet **"friendly kids"** or participate in group activities that facilitate bonding.

- **Example responses**:

    o "Opportunities to make friends."

    o "Places to socialize and create new experiences."

    o "More youth clubs to talk and chill with friends."

6. Better Public Spaces and Infrastructure

Many responses focused on improving the physical infrastructure of public spaces, particularly parks and sports facilities. Young people want **better-equipped parks**, with sports pitches that are consistently maintained. They also want more diverse offerings, from **bike parks** to **better football grounds**.

- **Example responses**:

    o "Bike parks and places to hang out safely."

    o "More football pitches in the parks."

    o "Parks and fun activities."

7. Educational and Social Development Opportunities

Lastly, young people in Cheltenham expressed a desire for places that help them develop their skills and personal growth. Some wanted **learning centres** or clubs focused on improving their social skills and providing education in a non-traditional format. Others highlighted the need for **"good children"** and **"more mature behaviour,"** pointing to a desire for environments that foster respect and personal development.

- **Example responses**:

    o "Learning centre where you can learn about the world."

    o "More mature behaviour in young adults."

    o "Teachers that aren't power hungry."

    o "More jobs to earn money."

The responses paint a vivid picture of young people's desires in Cheltenham. They are seeking **safer, more accessible, and affordable spaces** where they can feel secure, enjoy leisure activities, and form meaningful social connections. Additionally, the need for **emotional support** and better infrastructure, such as youth clubs and sports facilities, reflects their desire for a community that supports their overall well-

being. Providing young people with these amenities would not only enhance their quality of life but also empower them to grow and thrive in a supportive environment.

Imagining Youth Spaces: Designing the Ideal Hangout in Cheltenham

The survey asked young people to envision their perfect hangout spot with the question: 'If you could create a new place for kids to hang out in Cheltenham, what would it be like?' Their responses paint a vivid picture of what young residents desire in a social space. By analysing these ideas, we can better understand the features and atmospheres that appeal to Cheltenham's youth. These insights could prove invaluable for future community planning and development projects aimed at engaging young people.

Frequently Mentioned Responses:

- **"idk" / "Idk" / "I don't know"**: Like with the previous question, uncertainty was common among the responses, indicating that some young people were unsure of what an ideal space would look like.

Key Themes Were:

Safe, Inclusive, and Fun Spaces

A common desire among young people is for **safe and inclusive spaces** where they can hang out, play, and feel secure. Many emphasized the importance of safety, both in terms of physical security and creating environments free from bullying or other dangers.

- **"A park with lights, so you can see in the dark with equipment, so if they were ever being chased, they would have somewhere to hide."**

- **"A safe place with people looking after you."**

- **"A place where no bullies are allowed."**

In addition to safety, these spaces should foster inclusivity, where everyone feels welcome and comfortable participating in activities and socializing with others.

- **"A place filled with fun activities of all sorts where everyone is included."**

- **"Somewhere everyone feels welcome."**

- **"A space where people can talk and play with their friends."**

Recreational and Creative Activities

Young people clearly expressed a desire for **recreational spaces** filled with fun, creative, and engaging activities. They envision places that offer a wide variety of options, including sports, games, and creative outlets.

- **"It would have fun things like a trampoline park and slides."**
- **"A place with sports, gaming, and chill areas."**
- **"A place where you can do crafts, play video games, and go on trampolines all in one building."**

Creativity also played a key role, with some envisioning spaces where they could express themselves through **art, music, and learning**, alongside entertainment.

- **"A learning centre where you can create art and learn about things."**
- **"A place with crafts, music, and space to be creative."**

Outdoor and Nature-Oriented Spaces

The natural environment also came up as a key feature of young people's ideal hangout spots. Many envisioned **parks and outdoor areas** where they could engage with nature while still having space for recreational activities.

- **"A big park with trees and space to play."**
- **"A park with different equipment and areas to relax."**
- **"A magical forest with treehouses, zip lines, and secret tunnels."**

These responses reflect a desire for spaces that blend **nature and recreation**, providing relaxation as well as adventure.

Technology and Modern Features

Several young people incorporated technology into their vision of a hangout space, showing a clear interest in more modern **tech-oriented environments**.

- **"A place with virtual reality games and places to chill after school."**
- **"Gaming arcades where you can compete with friends and have fun."**

These responses indicate that while traditional outdoor activities are valued, there's also a strong interest in **tech-based entertainment**, which could make a space more attractive to today's youth.

Multipurpose Spaces for Socialising and Growth

Many responses highlighted the desire for **multipurpose spaces** that combine socializing, fun, and personal growth. They expressed a need for places where they can not only play but also develop friendships and new skills.

- **"A place where people can socialize and create new experiences."**

- **"A space where you meet others, feel safe, and have fun."**

Some even suggested spaces where they could grow emotionally or creatively, with environments designed to foster **learning, support, and personal development**.

- **"A place with crafts, music, and room to talk about your feelings."**

- **"A learning centre with areas to paint, make music, and learn new things while having fun."**

In consolidating the responses, it's clear that young people in Cheltenham are looking for **safe, fun, and creative environments** where they can hang out, explore, and grow. Whether it's through **recreational activities**, **modern tech features**, or **nature-oriented spaces**, these places should provide a **welcoming, inclusive atmosphere** that allows for both social interaction and personal development. The inclusion of quotes directly from the youth adds a layer of authenticity and insight into what matters most to them.

Research Limitations and Considerations

As with all forms of research, there are numerous factors to consider with interpreting the data.

Sample Size

The sample size of **578 responses** is strong for a local survey and allows for meaningful insights. However, when interpreting the results, it is important to consider how representative the sample is of Cheltenham's broader youth population. If certain groups (by age, gender, or geography) are underrepresented, this could limit the generalisability of the findings. The demographics of participants, such as **age**, **gender**, and **location**, can have a significant influence on the responses and overall results in various ways.

Age, gender and location

Younger participants (those born around 2010-2012) are more likely to use platforms that are popular among their peers, such as **TikTok**, **Snapchat**, and **gaming platforms** like **Roblox**. Older participants may lean more towards communication platforms like **WhatsApp** and **Instagram**, which cater to more mature interactions. They may also have different perceptions of safety compared to older participants.

Understanding of Issues: Younger participants may not fully grasp certain social or safety issues, leading to higher rates of "I don't know" or "unsure" responses, as seen in questions like "Do you feel like your opinions/ideas are heard in Cheltenham?"

Gender

Gender can influence how respondents experience social spaces, safety, and even social media platforms:

Safety Concerns: Females may report feeling less safe in public spaces or may be more likely to avoid certain areas at night. This was evident in the survey, where females had slightly higher rates of expressing safety concerns than males.

Social Media Preferences: Gender can also influence the choice of social media platforms. For example, females may be more inclined to use platforms like **Instagram** and **Snapchat**, which focus on visual content and social interaction, while males may be more drawn to **gaming platforms** like **Roblox** and **Minecraft**.

Perception of Issues: Gender may also affect how young people perceive community involvement, with one gender potentially feeling more or less heard in local decisions depending on social dynamics.

Location (Area)

Where a respondent life can have a profound effect on their perceptions of safety, community engagement, and social behaviour:

Safety Perception: Participants from areas with higher crime rates or fewer recreational spaces, like **Hesters Way** or **Spring bank**, may report higher concerns about safety, especially at night. In contrast, those from more affluent or well-policed areas may feel safer.

Community Engagement: Participants from different areas may have varying levels of community engagement. For example, respondents from areas with active youth programs or community centres may feel more heard and involved, while those in underserved areas may feel neglected or ignored.

Access to Resources: Location can also determine access to social spaces, activities, and opportunities for young people, affecting how they respond to questions about what they wish there was more of in Cheltenham.

Socioeconomic Factors

Though not explicitly measured in the survey, socioeconomic status, often tied to location, can also shape responses:

Access to Technology: Participants from wealthier backgrounds may have greater access to a variety of social media platforms and devices, while those from lower-income areas may have more limited access, which could affect their responses about social media usage. This matter was raised within the research steering group as we wanted it to be as inclusive as possible for everyone.

Opportunities and Concerns: Socioeconomic status can affect how young people view their opportunities and concerns. Those from lower-income areas may be more

worried about safety, while those from more affluent areas may have fewer concerns but higher expectations for youth services.

Self-Selection Bias

It is well worth noting that participation in the survey was non-incentivised and there was no pressure to complete any or all of the survey. Therefore, respondents who chose to participate in the survey might differ from those who did not. More engaged or vocal individuals may be overrepresented, while those who feel less connected to community activities might not have participated.

Cultural Background

While ethnicity wasn't a major focus of the survey, it's worth considering how cultural differences might affect young people's perspectives:

Social Norms: Cultural background can influence how young people engage with social media, particularly in terms of the types of content they view or share. Some may be more reserved, while others might be more vocal and interactive online.

Sense of Safety: Different cultural groups may experience safety and inclusion differently in a community, impacting their responses about avoiding certain places or feeling heard in local decision-making and also where they go for help or to find solutions.

Understanding these demographic influences can help ensure that any actions or programs developed from the survey results are targeted appropriately to address the needs of various groups within Cheltenham's youth population.

Empowering Professionals: Turning this Evidence Base into Strategies for Youth Support

Taking this entire investigation into account, key recommendations for professionals emerge. These recommendations: drawn from young people's responses aim to help youth services, educators, community workers, and health professionals in Cheltenham better meet the needs of young people and create environments that support their well-being and development.

Addressing The Perceived Lack of Influence

Though a minority (18%) feel their voices are heard, the overall sense of youth influence remains low. Young people may want to engage but feel the process is superficial or their impact is limited.

This suggests a widespread perception among young people that their voices are not being heard or valued in decision-making processes. This could lead to feelings of disenfranchisement and apathy, where young people may be less likely to engage in future civic or community activities because they believe their input will not make a difference.

This underscores the need for local authorities, schools, and community leaders to reassess how they engage with young people. More meaningful, transparent, and impactful youth engagement strategies need to be developed to combat this sense of disempowerment.

Increasing transparency and providing feedback loops where young people can see how their input has influenced decisions could help address this uncertainty. Clear communication from decision-makers on how they use youth input could build trust and reduce the number of respondents who are unsure of their impact.

Policy and Program Development

These findings should inform the development of policies and programs aimed at youth engagement. There is a clear need to create more inclusive platforms where young people feel their opinions are valued and can lead to real change. Decision-makers could consider youth councils, participatory budgeting, or advisory roles for young people in local governance as ways to bridge this gap.

Effective youth engagement programs should not only gather input from young people but also show them how their input is used in decision-making. This will foster trust and a sense of ownership among the youth, making them more likely to engage in and support local initiatives.

Educational Opportunities

The findings present an opportunity for schools and educational institutions to play a key role in fostering engagement. Educators can introduce programs that teach young people about civic engagement, democracy, and decision-making processes, empowering them with the knowledge and skills to participate more effectively.

Expand Digital Engagement and Safety Education

The survey revealed that young people spend a significant portion of their free time engaging in online activities. However, they also express concerns about inappropriate content and the potential risks associated with digital platforms. Addressing both their digital engagement and online safety concerns is crucial.

Recommendations:

- **Create Online Safe Spaces**: Local services should develop or collaborate with existing digital platforms to offer moderated, youth-friendly online spaces where young people can engage in activities safely.
- **Deliver Digital Literacy Programs**: Providing workshops and resources that teach young people about responsible online behaviour, cybersecurity, and how to recognize and handle inappropriate content will help them navigate the digital world safely.
- **Engage Parents and Guardians**: Involving parents in these discussions through webinars or information sessions equips them to support their children's safe online behaviour at home.

Given the high level of digital engagement and the potential harm posed by inappropriate content, professionals must ensure young people are not only engaged online but also protected. This approach ensures both digital literacy and safety are prioritised.

Increase Access to Physical Activity Programs and Spaces

The survey showed a strong interest in sports and physical activities like football and gym sessions. Providing access to such opportunities will enhance physical health and contribute to overall well-being.

Recommendations:

- **Enhance Sports Infrastructure**: Investment in youth-specific sports facilities—such as more gyms, football pitches, and recreational areas—is essential to meet the demand.
- **Offer Affordable Physical Activity Programs**: Collaborating with local sports organisations to offer free or low-cost programs will help remove financial barriers and increase participation.
- **Promote Inclusive Sports Opportunities**: Developing programs that cater to a wide range of interests and abilities will ensure all young people, regardless of skill level, feel welcome to participate.

With high interest in physical activities, expanding affordable, accessible sports programs will not only address physical health but also provide structured, positive outlets for social interaction and well-being.

Develop Safe and Inclusive Social Spaces

The survey indicated that young people highly value socializing with friends, but there is a shortage of safe and accessible places for them to gather. This highlights a gap in youth services that must be addressed to encourage positive peer interactions.

Recommendations:

- **Create Youth-friendly Social Spaces**: Professionals should work with local authorities to develop or improve existing community centres and youth clubs where young people can meet safely and comfortably.
- **Supervised Drop-in Programs**: Offering supervised, flexible programs that allow young people to drop in without long-term commitments would encourage more participation and meet the need for safe socializing environments.
- **Partnerships with Schools and Libraries**: Collaborating with schools and public libraries to provide after-hours spaces where young people can study, socialize, or engage in creative activities can fill the gap in accessible social spaces.

By creating inclusive social spaces, professionals can provide safe and constructive environments for young people to engage with peers, thus reducing potential risks associated with unsupervised socializing.

Support Mental and Emotional Well-being

While mental health wasn't the survey's central focus, the concerns raised about online safety, peer pressure, and limited social spaces indirectly point to the importance of supporting young people's mental health.

Recommendations:

- **Provide Accessible Mental Health Resources**: Ensure young people have access to mental health services, including counselling and peer support programs, both online and in-person.
- **Promote Well-being Programs**: Offer resilience-building workshops, stress management sessions, and other programs that focus on emotional well-being. These can be incorporated into schools or community centres.
- **Foster Peer-led Initiatives**: Encouraging peer mentoring and leadership programs can help create networks of support that are more relatable to young people, fostering a culture of emotional support.

By integrating mental health support into the wider youth service offering, professionals can help young people cope with challenges, improve resilience, and build stronger emotional well-being.

Foster Creative and Intellectual Engagement

Many young people indicated an interest in creative activities such as music, reading, and art. These intellectual and creative outlets are essential for self-expression and personal growth, particularly for those not engaged in sports or physical activities.

Recommendations:

- **Develop Arts and Culture Programs**: Create or expand arts workshops, music lessons, and creative writing clubs that provide young people with outlets for creative expression.
- **Leverage Libraries and Cultural Institutions**: Public libraries and cultural organisations should partner with youth services to offer creative spaces and programs that encourage intellectual engagement, such as maker spaces, art studios, or book clubs.
- **Multi-use Community Spaces**: Design community centres with areas designated for creative activities, allowing young people to choose how they want to spend their time and explore diverse interests.

Engaging young people in creative and intellectual activities fosters personal development, critical thinking, and emotional expression. Providing these outlets ensures that young people with diverse interests have access to supportive services.

Involve Young People in Decision-making

Including young people in decision-making processes ensures that services remain relevant and effective. This approach empowers young people, makes them feel heard, and increases engagement with the services designed for them.

Recommendations:

- **Establish Youth Advisory Panels**: Create opportunities for young people to have direct input into the design and implementation of youth services through advisory boards or regular feedback sessions.
- **Conduct Regular Youth Consultations**: Continue engaging young people through surveys, focus groups, or open forums to ensure services adapt to their evolving needs.
- **Encourage Youth Leadership**: Provide training and opportunities for young people to take on leadership roles in youth programs and activities, helping them develop leadership skills and fostering a sense of ownership in their community.

Involving young people in decision-making not only makes services more relevant and responsive but also empowers them to take an active role in shaping their community, fostering leadership and a sense of agency.

Conclusion:

By implementing these recommendations, professionals can ensure their services are not only aligned with the needs of young people but are also adaptable and responsive to future changes. Offering diverse, accessible, and inclusive programs—while involving young people in decision-making—will help create a supportive environment that encourages well-being, creativity, physical activity, and emotional health.

This page is intentionally left blank

Cheltenham Borough Council

Cabinet – 18 February 2025

Local Validation List (Planning)

Accountable member:

Councillor Mike Collins – Cabinet Member for Planning and Building Control

Accountable officer:

Chris Gomm, Head of Development Management, Enforcement & Compliance

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

This report sets out the background to local validation lists including what they are, the necessity for every local planning authority to have one and the importance of it being regularly reviewed, kept up to date and tailored to current local planning policy.

The national requirements for the content of a planning application are prescribed by legislation and are limited to a small number of documents and other supporting information which is mandatory. For this reason, legislation also enables local planning authorities to go further and supplement the national requirements with their own local requirements in the form of a 'local validation list' (sometimes referred to as a 'local validation checklist'). Once a local validation list has been adopted and published it is legally binding; an applicant is then obliged to submit the information set out in the local validation list when the application is first submitted and if they do not, the council can refuse to validate the application until that information is provided.

Requiring the submission of certain, prescribed supporting information upfront is advantageous to the council:

1. It can significantly expedite the assessment of the proposal because consultees and other third parties have the information that they require from the outset, rather than identify its absence through consultation responses, followed by a long delay while that absent information is prepared. Going forward, this will place the council in a much better position should the proposed removal of the ability to agree an extension of time (to statutory determination deadlines) come to fruition.

2. Helps to ensure that the information requested is proportionate to the type and scale of the application being made.

3. The local validation list is likely to raise the standard of applications and development more broadly because important supporting information will inform the design process rather than retrospectively justify the approach that has been taken.

The content of the draft local validation list is summarised within the report.

Recommendation: That Cabinet:

- **approves the draft Local Validation List (with its final published form/format/ appearance delegated to Head of Planning, in consultation with the Cabinet Member for Planning and Building Control).**

---

1. Implications

1.1 Financial, Property and Asset implications

Signed off by: Ela Jankowska – Finance Business Partner, ela.jankowska@cheltenham.gov.uk

1.2 Legal implications

The Council may adopt local validation list for planning applications and consents and this power is an executive function. The proposed updated local validation list will sit alongside national information requirements and must accord with section 62 of the Town and Country Planning Act 1990 ("TCPA 1990"). Section 62(3) TCPA 1990 states: The local planning authority may require that an application for planning permission must include— (a) such particulars as they think necessary; and (b) such evidence in support of anything in or relating to the application as they think necessary. Under Section 62(4A) TCPA 1990 requirements on the local validation list: (a) must be reasonable having regard, in particular, to the nature and scale of the proposed development; and (b) may require particulars of, or evidence about, a matter only if it is reasonable to think that the matter will be a material consideration

in the determination of the application.

Under Article 11(2)(e) of the Town and Country Planning (Development Management Procedure) Order 2015, local planning authorities are not obliged to validate a planning application unless (among other requirements) the documents in the Council's local validation list have been submitted. However, Article 11(3) qualifies this requirement by providing that it only applies where the local validation list has been published or re-published within the two years before the date of submission of the application. The effect of this is that the local validation list is only binding on applicants if it is re-published every two years. There is no statutory requirement to consult on the review and publication or re-publication of the local validation list. However, the National Planning Practice Guidance advises that local planning authorities should, after reviewing existing local validation list, consult on changes before they are finalised and published.

The process to adopt the revised local validation list, as set out in this report, meets the relevant statutory requirements and complies with the NPPF and NPPG.

Signed off by: Charlotte Lockwood, Locum Senior Lawyer, charlotte.lockwood@onelegal.org.uk

1.3 Environmental and climate change implications

Several requirements in the Local Validation Checklist relate to sustainable/nature policy which ensures impact in these areas are considered within the planning application process. The associated aim is to mitigate negative implications and improve sustainable urban development within the borough.

Signed off by: Maizy McCann, Climate Officer maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Working with residents, communities and businesses to help make Cheltenham #netzero by 2030
- Increasing the number of affordable homes through our £180m housing investment plan

1.5 Equality, Diversity and Inclusion Implications

See Appendix 2.

2. Background

Page 94

2.1 When a planning application is first received, it must go through a validation process to ensure that the minimum level of information requirement by statute is present. Only when that minimum level of information has been received by the council can the application be validated, made public and the process of consultation and assessment begin. The national validation requirements, as predominantly set out in the [Town & Country Planning Development Management Procedure Order 2015 (as amended)](), are surprisingly narrow and are limited to:

- the application form;
- the correct application fee;
- existing and proposed plans/drawings;
- ownership certificate;
- a Design & Access Statement (in certain circumstances);
- an Environmental Statement (if EIA development);
- biodiversity net gain information (if a liable application); and
- a Fire Statement (in certain circumstances in relation to tall buildings)

2.2 It should be noted that the accuracy of the information supplied is the responsibility of the applicant. There are specific requirements under Section 65 of the Town and Country Planning Act 1990, local planning authority shall not entertain an application unless the requirements are met. Any person who knowingly or recklessly issues a false or misleading certificate is guilty of an offence. It is therefore the responsibility of the applicant to ensure certificates are completed accurately and with the appropriate evidence in place to support if requested.

2.3 Supporting information/documentation beyond that specified in national legislation can only be required by the local planning authority (at the validation stage) if that authority has adopted a 'local validation list' which prescribes that that information must be provided (in the relevant circumstances).

2.4 National government encourages the use of local validation lists in the Planning system; the government's position is set out at Paragraph 45 of the [NPPF]() (National Planning Policy Framework - 12 December 2024):

> "*Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions and should be reviewed at least every 2 years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question*".

2.5 S62 of the Town and Country Planning Act 1990 (as amended by [s6 of the Growth and Infrastructure Act 2013]()) enables local planning authorities to produce

and publish a local validation list and gives them legal weight. The [Development Management Procedure Order (2015)](#) referenced above states that a local validation list only has legal effect if it has been, "*published (or republished) during the 2-year period immediately before the date on which the application is made*".

2.6 It is considered essential for the proper operation of the planning system in Cheltenham for the council to:

1. prepare, adopt and publish an entirely new local validation list; and

2. review, revise and republish that list on a rolling biennial basis.

3   Reasons for recommendations

3.1 The borough council currently has a local planning validation list in the form of a number of PDF checklists which can be downloaded from our [website](#). These validation checklists are for the most part historic and given the age are in effect guidance only and not legally binding on an applicant; a replacement local validation list is therefore imperative particularly given the Government's agenda in respect of delivery.

3.2 The local validation list is an important and useful tool to ensure that the authority has all of the key documents and supporting information required (upfront) to assess a proposal against local planning policy, as well as against any other relevant material consideration.

3.3 The requirements of any local validation list should be tailored to reflect the tests imposed by local planning policies; the required documentation should demonstrate how a particular proposal complies with the relevant planning policy and should ultimately assist the decision-taker with the subsequent planning assessment. It is this lack of connection between the existing checklist and current local planning policy which renders it obsolete.

3.4 The new (draft) local validation list has been written to reflect current, adopted planning policy namely those set out within The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (2017) and The Cheltenham Plan (2020).

3.5 The new local validation list will ensure that, going forward, the information required to assess any given proposal against our adopted planning policies is produced ***prior*** to submission of the application and provided to us at the outset, before the application is first validated and registered. The new local validation list will be legally binding; it will be a legal requirement that the documents and supporting information prescribed within be submitted at the very beginning of the planning application process; this has a number of advantages:

1. It will significantly reduce delays encountered when further information is requested by the case officer several weeks into the processing of the application.

2. In many (but not all) cases, consultees will have the information that they need to assess the application upfront when they are first consulted; rather than having to be reconsulted later, when missing information is obtained.

3. By requiring supporting information upfront rather than several weeks into the process, it is more likely that that information / assessment forms part of an iterative, initial design process, rather than being an 'after thought' produced retrospectively to justify an element of the scheme. This should lead to higher quality development.

4. The number and scope of conditions imposed on a planning permission will likely be reduced as in some cases that information will have already been provided and submitted. This will reduce delays to implementation / commencement of development post approval.

5. It should overall improve the quality and consistency in applications received.

3.6 The draft 2024 local validation list version is available as an appendix to this report; the requirements of the draft list are summarised below:

- **Affordable Housing Statement** – required when the provision of affordable housing is a policy requirement. Required so that compliance with Policy SD12 (affordable housing) and the NPPF can be properly assessed (at the outset).

- **Viability Appraisal** – required when the provision of affordable housing is required as above but a sub-policy contribution is instead offered on financial viability grounds. Required so that compliance with JCS Policy SD12 can be properly assessed (at the outset).

- **Flood Risk Assessment** – required principally when the application site is in Flood Zone 2 (medium risk) or Flood Zone 3 (high risk). Required so that compliance with JCS Policy INF2 (flood risk management) can be properly assessed (at the outset).

- **Contaminated Land Assessment** – required on sites where there is a known contaminative use (including historic uses) plus the redevelopment of industrial or manufacturing sites and refuelling sites. Required so that

compliance with JCS Policy SD14 (health and environmental quality) can be properly assessed (at the outset).

- **Ecology Report / Assessment** – required for all major applications, demolition, woodlands, mature trees, watercourses, underground structures, derelict buildings and land. Required so that compliance with JCS Policy SD9 (biodiversity and geodiversity) can be properly assessed.

- **Arboricultural Impact Assessment** – required for any application where there is an impact on a tree (with certain exclusions). The AIA will include a tree survey. Required so that compliance with JCS Policy INF3 (green infrastructure) can be properly assessed (at the outset).

- **Heritage Statement** – required for all applications for Listed Building Consent as well as any planning application that is likely to impact upon a designated heritage asset (including its setting). Required so that compliance with JCS Policy HE2 (archaeology) can be properly assessed as well as Cheltenham Plan (CP) Policy SD8 (historic environment) (at the outset).

- **Landscape and Visual Impact Assessment (LVIA)** – required for major applications within the Cotswolds National Landscape (until recently known as the Cotswolds Area of Outstanding Natural Beauty - AONB). Required so that compliance with JCS Policy SD6 (landscape) can be properly assessed at the outset, as well as JCS Policy 7 (Cotswolds AONB).

- **Energy Statement** – required for all major applications so that compliance with JCS Policy SD3 (sustainable design and construction) can be properly assessed at the outset, as well as compliance with the Climate Change SPD.

- **Sustainable Construction Checklist** – required for all non-major residential applications; (i.e. 1-9 dwellings) this is a less onerous version of the Energy Statement required for major residential schemes. Required so that compliance with JCS Policy SD3 (sustainable design and construction) can be properly assessed at the outset together with compliance with the Climate Change SPD. Major residential applications will also need to submit a completed checklist alongside an Energy Statement to ensure that there is consistency in information gathering/reporting.

- **Transport Assessment** – required for all major applications likely to generate significant levels of vehicular movements. Required so that

compliance with JCS Policy INF1 (transport network) can be properly assessed (at the outset).

- **Travel Plan** – required for all major applications unless the proposal is unlikely to generate significant levels of vehicular movements. Required so that compliance with JCS Policy INF1 (transport network) can be properly assessed (at the outset).

- **Retail Sequential Test** – required for applications seeking consent for main town centre uses which are not located in an existing centre or in a location where new retail uses are supported by planning policy. Required so that compliance with JCS Policy SD2 (retail and city/town centres) can be properly assessed (at the outset).

- **Retail Impact Assessment** – required for retail and leisure proposals which exceed 2500m2 gross floor space should that development be neither located in an existing centre nor in accordance with the development plan. Required so that compliance with JCS Policy SD2 (retail and city/town centres) can be properly assessed (at the outset).

- **Health Impact Assessment** – required for major applications on 'strategic sites'. Required so that compliance with JCS Policy SD14 (health and environmental quality) can be properly assessed (at the outset).

- **Employment Skills Plan** – required for major applications for indoor commercial development of 1,000 sqm or more. Required so that compliance with JCS Policy EM3 (employment skills plans) can be properly assessed (at the outset).

- **Open Space Assessment** – required for all major residential applications and any application proposing or causing a loss or erosion of open space. Required so that compliance with CP Policy C12 (sport and open space in new residential development can be properly assessed (at the outset).

- **Noise Impact Assessment** – required for applications seeking consent for new commercial entertainment premises and any other proposal likely to generate significant levels of noise where there are residential receptors nearby. Required so that compliance with JCS Policy SD14 (health and environmental quality) as well as JCS Policy SD4 (design requirements) can be properly assessed (at the outset).

- **Self-Build / Custom Build Proforma –** required when a residential application is described as 'self-build'. Required so that we can be

confident that the proposal in question legitimately meets the definition of self-build; this is because such developments are BNG and CIL exempt.

- **Statement of Community Involvement** – required for all major applications so that the council can fully understand the nature of any pre-application involvement with the community.

- **Sustainable Drainage Strategy** – required for residential development and most new-build development over a certain threshold. Required so that we can be confident that the proposals have followed the SUDS hierarchy for surface water disposal in accordance with JCS Policy INF2 (Flood Risk Management).

3.7 S62 of the Town and Country Planning Act 1990 (as amended by s6 of the Growth and Infrastructure Act 2013) sets out the statutory tests for local validation lists (which are also summarised at Para 45 of the NPPF quoted above). It states that the particulars and evidence included in a planning application must:

a) be reasonable having regard, in particular, to the nature and scale of the proposed development; and
b) only be sought if it is reasonable to think that the matter will be a material consideration in the determination of the application.

3.8 It is considered that all of the validation requirements specified in the draft list comply with these statutory tests. All requirements relate to matters which are demonstrably material in respect of the circumstances prescribed. A reasonable and proportionate approach has been taken to devising the relevant thresholds with a sensible balance struck between requiring a wide range of supporting information and the need to avoid being too onerous or disproportionate in what is requested.

4. Alternative options considered.

4.1 Not replacing the current local validation list is not considered to be a realistic alternative option. As set out above, local validation lists must be published (or republished) at least every two years. A consequence of a local validation list exceeding two years since publication is that it ceases to have legal effect and an application must be validated even if the requisite information has not been provided. This is a highly undesirable way forward which will ultimately compromise the council's decision-taking ability as well as its timeliness.

4.2 The approach that the draft local validation list has taken is a middle ground between a light-touch validation list and one which is exhaustive; both of these alternative options were considered. The advantage of a light-touch validation list

is that it limits the burden imposed on the applicant, but this is at expense of decision taking. The advantage of an exhaustive validation list is that this provides the council with the comprehensive and complete information needed for decision-taking, but this would be too onerous on the applicant, excessive and highly disproportionate. It is considered that the option that has been selected (i.e. the middle ground) is the most appropriate.

5. Consultation and feedback

Cheltenham Borough Council

5.1 The draft local validation list has been circulated to all members of the council via email (14/11/24). Feedback received is summarised as follows:

- It should be a requirement [of the local validation list] that existing and proposed elevational drawings be provided on the same page so it is easy to compare;
- It should be a requirement that street scenes, ideally photo/montage, be provided so that we can properly understand the impact on the street scene and the impact on adjacent properties.
- Photographs should be provided with tree applications.
- Block plans should show the distance to the nearest residential properties.
- Definitions should come at the top of the document.

CBC Planning Agents' Forum

5.2 The planning agents' forum meets 2 or 3 times per year and is an opportunity for the Planning team to liaise directly with our most frequent planning agents (i.e. Planning consultants and similar) in Cheltenham. The agents' forum was briefed in respect of the draft local validation list at its most recent meeting on 28 November 2024; the feedback received is summarised as follows:

- The list should be in alphabetical order.
- There should be an ability to satisfy multiple requirements of the list in a single document, rather than separate documents; this should be made clear in the list itself.
- There should generally be a differential made between small majors and other major applications – so that scope and detail is proportionate.
- There should be one list for local and national requirements.
- There may be contractual or data protection reasons why all financial viability information should not be made public, presumably there are exemptions to full publication?
- BNG (Biodiversity Net Gain) requirements should be stated in the ecology section (for completeness) rather than under national

requirements.

- In respect of Heritage Statements, these should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on heritage asset's significance (as per para 200 of the NPPF). This should be stated clearly in the Local Validation List.
- Will the Cotswold National Landscape Board be consulted? – particularly in respect of the requirements for LVIAs (Landscape and Visual Impact Assessment).
- Thresholds are suggested in respect of Transport Statements (TA) and Transport Assessments (TA) - where schemes are likely to generate significant levels of vehicular movements (i.e. 50+ dwellings for TAs and 11-49 dwellings for TS').
- Travel Plans should be for 50+ dwellings (rather than all major applications as suggested).
- The retail sequential test requirements should exclude anything not defined as a main town centre use (in the NPPF).
- Need for clarification on use of terms such as 'town centre' and 'existing centres'
- A threshold of 50+ dwellings is suggested for Open Space Assessments and suggestion that open space must be 'public' to avoid confusion.
- Requirements for Noise Impact Assessments considered excessive – example given of extending a cinema's opening hours by one hour.
- Resistance to Self-Build Proforma
- A threshold of 50+ dwellings is suggested for Statements of Community Involvement.

Response to Consultation Feedback

5.3 It should be noted in addition to the consultation responses summarised above, a number of CBC officers have fed into the drafting process and their comments and suggestions are integrated into the draft local validation list, where appropriate.

5.4 Comprehensive comments have been received from a number of third-party stakeholders which it is not necessary to individually address here, there are however a number of key points that must be responded to:

5.5 It is agreed that the list should be in alphabetical order; that revision has been made to the current draft as members will note. The draft local validation list presented to cabinet will in any case likely be revised in respect of its format when published on the council's website, to meet online accessibility standards (the content will not be materially altered).

5.6 The published version will be clear that the various documents required to meet validation requirements need not be standalone documents; they may, for

example, form chapters of a wider-ranging document if the agent so chooses. It is the content that is key, not the format.

5.7 Various comments have been made in respect of the need for submitted documents to be proportionate to the scale and complexity of the application in question; this is agreed. It is not considered that the draft local validation list as currently drafted suggests otherwise. Ultimately validating officers will not be assessing the quality nor scope of the submitted document; that assessment is undertaken post-validation by the case officer and consultees concerned.

5.8 Specific thresholds (typically 50 dwellings) have been suggested for a number of documents, namely Transport Assessments, Travel Plans, Open Space Assessments and Statements of Community involvement. It is agreed that some form of black and white threshold for these documents (and all documents in the LVL) is preferrable over a subjective case-by-case approach (for consistency and ease of use) *however* in the case of transport and travel related matters this is incredibly difficult to set as each site, proposal and impact will differ. In the case of travel and transport related-documents, their inclusion (and scope) will therefore need to be agreed on a case-by-case basis with GCC involvement; this is the approach adopted by the other district/borough councils across Gloucestershire. In the case of Open Space Assessments and Statements of Community Involvement it is considered that the thresholds set in the LVL are appropriate (i.e. a SCI for all major development and an OPA for all major residential development and/or proposals involving a loss of open space). A threshold of 50 dwellings or more would be too high as such impacts can arise on developments of <50 dwellings.

5.9 It has been suggested that the requirement for Open Space Assessments be limited to proposals impacted upon *public* open space. The NPPF uses the term 'open space' which encompasses any open space of public value irrespective of whether it is 'public' in an ownership or access sense. It is not appropriate therefore to use the term 'public open space'. Similarly, references to town centre uses and existing centres etc (which have been questioned) are to be interpreted as per the glossary to the NPPF (2024); revisions to the local validation list are not considered to be necessary.

5.10 One suggestion made by a number of individuals is that the local validation list should require plans and drawings to be annotated with measurements, in particular the distances between existing and proposed buildings. Whilst there is sympathy with this suggestion, in practice it would be of limited and disproportionate value. If drawings were annotated with measurements, the accuracy of those annotations would need to be checked by officers, this would be impracticable. All drawings must already be drawn to a recognised scale and so accurate measurements can be obtained if needed.

5.12 Finally, concerns have been raised in respect of proposed thresholds for requiring a noise impact assessment. It is agreed that requiring such an assessment in cases where minor changes to hours of operation are proposed would be excessive and too onerous; this has therefore been omitted. As with any document required in relation to a planning application, this does not prevent it being requested later in the process, post-validation.

Key risks

See Appendix 1

Report author:

Chris Gomm, Head of Planning
chris.gomm@cheltenham.gov.uk

Appendices:

    i.   Risk Assessment
    ii.   Equality Impact Assessment Screening
    iii.   Climate Change Impact Assessment
    iv.   Draft Local Validation List

Background information:

None

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the Local Validation List is not approved it places the local planning authority in a weaker position in requiring the submission of key information to support the efficient and timely assessment of planning applications	Head of Planning	3	2	6	Accept	Work with members and the agents forum in the preparation of the validation checklist	Head of planning	Cabinet decision

Appendix 2:   Equality Impact Assessment

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: *Chris Gomm*	Service Area: *Planning*
Title: *Head of Planning*	Date of assessment: *04 November 2024*
Signature: Chris Gomm	

b. Is this a policy, function, strategy, service change or project?

Is this a policy, function, strategy, service change or project?	Policy
Policy	

c. Name of the policy, function, strategy, service change or project

Local Validation List

Is this new or existing?	**Already exists and is being reviewed**

Please specify reason for change or development of policy, function, strategy, service change or project

Previous document out of date and obsolete

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To ensure that all planning applications (and other application types) are accompanied at submission with the information required to assess the key planning issues / material considerations.
Objectives:	• Better quality decision-making • Speedier decision making with less delays caused by requesting key information after the statutory decision deadline has already been set. • Better quality consultation – because the information that consultees and members of the public etc. is there at the outset to comment on. • Reinforcing the emphasis on the applicant on requirements and accuracy of information provided.

Outcomes:	• An adopted up-to-date local validation list • The publication of the above on the council's website in an accessible format.
Benefits:	As per the objectives above.

e. What are the expected impacts?

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

Please provide an explanation for your answer:
The adoption of a more comprehensive local validation list will ensure that third parties have a superior quantum and quality of information on which to comment. There may be a higher financial and time cost (initially) to applicants / developers in preparing this information but this is for this is for the benefit, including their own, as the decision on their application will be far better informed and likely dealt with within a shorter timeframe.

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

f. Identify next steps as appropriate

Stage Two required	**No**
Owner of Stage Two assessment	**N/A**
Completion date for Stage Two assessment	**N/A**

Local Validation Checklist (by document type)

Information/documentation that **MUST** be submitted alongside a planning application in order for that application to validated (in addition to National Requirements). The requisite information need not be presented in separated documents.

Requirement	When required	What should be included	Tick
Affordable Housing Statement	When the provision of affordable housing is a policy requirement i.e. residential developments of 10 dwellings or more, or residential developments with a gross floor space exceeding 1000sqm.	Information in respect of the number, type, mix, size, accessibility standards and tenure of the proposed affordable homes. The information must explain how the proposal meets the requirements of Policy SD12 (Affordable Housing) and Policy SD11: (Housing Mix and Standards) of the Joint Core Strategy.	
Arboricultural Impact Assessment	Any development (including householder applications) which will have an impact on a tree on or adjacent to the site (excluding small trees with a trunk diameter of less than 75mm measured 1.5m above adjacent ground level).	The survey and associated assessment must provide us with the information required to assess the proposal against Policy INF3 (Green Infrastructure) of the Joint Core Strategy as well as Policy G13 (Trees and Development) of the Cheltenham Plan. The Arboricultural Impact Assessment must include a tree survey and a plan showing which trees will be retained and/or removed. The survey must be undertaken in accordance with British Standard 5837:2012.	
Contaminated Land Assessment	Applications proposing development on sites where there is a known potentially contaminative current or historic use. Applications proposing the redevelopment of industrial and manufacturing sites and petrol filing stations (and similar)	The submission must provide us with the baseline information required to begin our assessment of the application against Policy SD14 (Health and Environmental Quality) of the Joint Core Strategy. A Phase 1 Preliminary Risk Assessment shall be submitted. Please note that further information / assessment is likely to be required (post-validation) in the event that the Phase 1 assessment identifies potential unacceptable risk or areas of concern. The assessment shall comply with the Code of Practice for Land Contamination of Potentially Contaminated Land - BS10175	

Ecology Report (including protected species survey)	All major applications Non-major applications (including listed building consent) where demolition is proposed. Development (including householder applications) affecting the following habitats: • Woodland, parkland and mature trees • Watercourses and other aquatic habitat • Underground structures (caves, cellars etc) • Derelict buildings or land	The ecology report/survey must provide us with the information required to assess the application against Policy SD9 (Biodiversity and Geodiversity) of the Joint Core Strategy. If the report/survey identifies the need for *additional* surveys, then those too must be undertaken and submitted in order for the application to validated. The surveys and associated report must comply with the British Standard for Biodiversity (GS42020). The ecological baseline shall include an up-to-date desktop search of protected habitats and species on and adjacent to the site, as well as an evaluation of ecological features and assessment of the significance of effects arising from the impacts of the development.	
Employment Skills Plan (ESP)	Applications for major indoor commercial development of 1,000 sq. m or more	This plan should identify opportunities for the employment and skills development of local people associated with the implementation of the development proposal and thus demonstrate compliance with Policy EM3 (Employment Skills Plan) of the Cheltenham Plan. The ESP should address priorities identified and agreed at an early stage through liaison with the Council itself and local employment and skills agencies. It is anticipated the ESP will contain targets which are in conformity with industry standard benchmarks for the outcomes expected from the particular size and type of construction proposed. Targets will likely relate to the jobs created at the construction phase of development as well as the jobs created thereafter. The Construction Industry Training Board's (CITB) Client Based Approach is recommended.	Page 108
Energy Statement	All major applications	The Energy Statement must provide us with the comprehensive information required to assess the proposal's compliance with the Climate Change Supplementary Planning Document (June 2022) as well as Joint Core Strategy Policy SD3 (Sustainable Design and Construction).	

		The provision of an Energy Statement with major applications is an explicit requirement of JCS Policy SD3.	
Flood Risk Assessment	Development (including householder applications) in areas designated by the Environment Agency as Flood Zone 2 or 3 (medium risk or high-risk river flooding) or in areas designated medium or high-risk surface water flooding, plus: • Development within Flood Zone 1 or low risk surface water flood risk zone with a site area of 1 hectare or more. • Development where the council's Strategic Flood Risk Assessment (SFRA) shows that the site will be at risk from any form of flooding, now or in the future.	An assessment of flood risk from all sources of flooding (plus an allowance for climate change) which shall include: • A detailed description and explanation of the site and development proposed • Estimated site-specific flood levels • Details of proposed finished floor levels • Details of any proposed flood mitigation measures, including safe access and egress routes (where required). • Any supporting plans and documentation The submission must provide us with the information we require to assess the application again Policy INF2 (Flood Risk Management) of the Joint Core Strategy.	
Flood Risk Sequential Test Assessment	Applications proposing development in areas known to be at risk of any form of flooding unless it is: • An application for a change of use (unless relating to caravans/park homes or similar) • An allocated site in the Development Plan. • A householder application. • An application for a small non-residential extension (i.e. with a footprint of less than 250m2). • A situation where a site-specific flood risk assessment demonstrates that no development, escape routes, land raising, or other potentially vulnerable elements are in areas of the site identified at risk from any form of flooding, now and in the future.	The purpose of the sequential test is to demonstrate that there are no alternative sites available for the proposed development in lower flood risk zones (taking into account wider sustainable development objectives); depending on flood risk vulnerability, the assessment will need to demonstrate this. If your development is located within an area of high or medium risk, you will need to demonstrate, through a site search, that there no reasonably available sites in a medium or low risk lower risk areas. If your site is within medium risk area you will need to demonstrate that there are no reasonably available sites in a low risk area. For the purposes of the sequential test, the area of search is limited to the administrative boundary of Cheltenham Borough. The submission must provide us with the information we require to assess the application against Policy INF2 (Flood Risk Management) of the Joint Core Strategy	Page 109

Health Impact Assessment	Major applications on the 'Strategic Allocations' (as allocated in the development plan).	The provision of a Health Impact Statement with applications at the council's strategic allocations is an explicit requirement of JCS Policy SD14 (Health and Environmental Quality). The council recommends the use of the NHS Healthy Urban Development template which can be found here.
Heritage Statement / Statement of Heritage Significance	All applications for listed building consent Any development that may impact upon a designated heritage asset (including its setting); this includes but is not limited to conservation areas, listed buildings, scheduled monuments and registered parks/gardens. Householder planning applications are excluded from this requirement.	The information submitted must provide us with the information that we need to assess the proposal against Policy SD8 (Historic Environment) of the Joint Core Strategy as well as Policy HE2 (Archaeology) of the Cheltenham Plan. As a minimum the statement must assess the significance of the heritage asset and in turn the impact of the proposal on that significance. If harmful impacts are found to be present, or likely, then the statement should set out the justification for that harm. The Heritage Statement may be incorporated into the Design & Access Statement if appropriate.
Landscape and Visual Impact Assessment (LVIA)	Major applications within the designated Cotswolds Area of Outstanding Beauty (AONB), or within its setting.	The assessment must review the impact of the proposed development in both landscape and visual terms, following the methodology set out in the 'Guidelines for Landscape and Visual Impact Assessment', 3rd Edition 2013 (GLVIA3) LI/IEMA. The submitted LVIA must provide us with the information required to test major proposals against both Policy SD6 (Landscape) and SD7 (Cotswolds AONB) of the Joint Core Strategy as well as against the Cotswolds National Landscape Management Plan.
Noise Impact Assessment	Planning applications for new commercial entertainment/leisure facilities such as public houses, nightclubs and cinemas. Development likely to generate additional levels of noise and/or vibration where close to existing (or proposed) residential uses.	The assessment will need to identify potential sources of noise and how these will impact upon noise sensitive receptors. If an adverse impact is identified, the assessment must set out how such impacts will be mitigated to a level which is acceptable. The assessment will ultimately need to demonstrate that the proposed development complies with Policy SD14 of the Joint Core Strategy 'Health and Environmental Quality' as well as Policy SD4 'Design Requirements'.

	Residential development where proposed close to existing sources of noise and / or vibration.		
Open Space Assessment	All major residential development Any development involving the loss of, or erosion of open space.	The assessment will need to set out the quantum and nature of existing and proposed open space within the application site and the wider area. If an increase is open space is being proposed it will need to be demonstrated that this is sufficient to meet the development's needs. If a loss of open space is being proposed then an assessment will need to comprehensively demonstrate how the proposal meets one or more of Sport England's 'Five Exceptions' [insert link]. In all cases the assessment will need to include the information that the council requires to assess compliance with CP Policy C12 (sport and open space in new residential development)	
Retail Impact Assessment	Applications for retail and leisure developments which exceed 2500m2 gross floor space *if* that development is neither located in an existing centre nor in accordance with the development plan.	The impact assessment must include an assessment of: - the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme). The submitted assessment must enable us to test the application against Policy SD2 (Retail and City/Town Centres) of the Joint Core Strategy.	Page 111
Retail Sequential Test	Applications for main town centre uses which are neither located in an existing centre nor in accordance with the development plan. *This excludes applications for small scale rural offices and other small scale rural development.	The information submitted must enable us to assess whether there are any suitable alternative sites for the proposed town centre use in sequentially preferable locations (such as within existing centres followed by edge-of-centre) in accordance with Policy SD2 (Retail and City/Town Centres) of the Joint Core Strategy.	

Self-Build / Custom Build Proforma	All residential planning applications which are described as self or custom build or where a CIL/BNG exemption is claimed on such grounds.	The council needs to be satisfied, in so far as it can be, that the claim that a development is 'self-build' is legitimate; this is because the consequence of accepting a development's 'self-build' nature is significant in that it will be exempt from both the Community Infrastructure Levy (CIL) and Biodiversity Net Gain (BNG).

The council's self-build proforma requests key information and must be completed (in full) and returned before a relevant application can be validated; it can be downloaded here [insert] | |
| **Statement of Community Involvement** | All major planning applications | The statement of community involvement must set out the nature of any community engagement prior to submission of the application, including the extent to which the views of the community have shaped and influenced the scheme. | |
| **Sustainable Construction Checklist** | All major applications

Applications seeking consent for 1-9 dwellings. | This is a less onerous document to an Energy Statement enabling applicants for smaller residential developments to provide the information required in the form of a checklist. The checklist can be downloaded here [insert link]. Applicants for major development will need to submit both (i.e. an energy statement and the checklist). | |
| **Sustainable Drainage Strategy** | A SUDS strategy is required for any development:

- of 1 or more new dwellings.
- A construction footprint exceeding 100m2. | The report must demonstrate that the development has followed the SUDS hierarchy for surface water disposal as required by JCS Policy INF2 (Flood Risk Management) and provides SUDS with multifunctional benefits (Water quantity, Water quality, Amenity, and Biodiversity). The strategy must include:

- Proposed post-development surface water flows and volume, including a comparison with pre-development values.
- A drainage design layout plan including proposed design levels.
- An exceedance flow route plan identifying safe surface water flow routes through the site should the capacity of the drainage system be exceeded.
- Proposals for maintenance and management of SUDS. | |

		NB. For single dwellings a high-level strategy identifying the method of surface water disposal off the site (following the SUDS hierarchy) may be acceptable - with detailed technical aspects instead deferred by Planning condition.	
Transport Assessment/Transport Statement	All major applications likely to generate significant levels of vehicular movements.	Precise scope to be agreed with Gloucestershire County Council on a case-by-case basis but it will need to demonstrate the impact, including cumulative impacts, of the proposed development on: • Congestion on the transport network • Travel safety within the zone of influence of the development. • Noise and / or atmospheric pollution within the zone of influence of the development The information submitted must enable to us to assess the application against Policy INF1 (Transport Network) of the Joint Core Strategy.	
Travel Plan	All major applications unless they are unlikely to generate significant levels of vehicular movements.	The travel plan must set out a package of measures to encourage sustainable travel options to and from the development.	
Viability Appraisal	When the provision of affordable housing is a requirement of Policy SD12 of the Joint Core Strategy, *but* the affordable housing offer is below that required by policy due to financial viability concerns.	A detailed appraisal which sets out why a policy compliant affordable housing offer is unviable in this case. The appraisal must follow the approach / methodology advocated by the NPPF / NPPG and must be prepared by suitably qualified professionals. The appraisal will be assessed by a third-party on behalf of the council with the **cost of this assessment met by the applicant** (post-validation of the application). Please note that the viability appraisal (and all associated documentation) will not be treated as confidential but will be available to view by all on the council's planning website.	

National Validation Requirements

The following are the nationally set validation requirements for planning applications etc. **including householder applications.**
These are included here for completeness and ease of reference. Cheltenham Borough Council has no authority to alter these requirements.

What is Required	When Required	Guidance	Tick
Application Form(s)	All applications	The relevant application form can be completed online, via the Planning Portal. Alternatively, paper versions of the relevant forms can be download from the Planning Portal and submitted.	
The Application Fee	All applications (unless a fee exemption applies)	As per the nationally set schedule of fees which can be found here [insert link]	
Ownership Certificate	All applications except applications for Advertisement Consent	This is a certificate which applicants must complete that provides certain details about the ownership of the application site and confirms that an appropriate notice has been served on any other owners (and agricultural tenants). As set out in [Section 65 of the Town and Country Planning Act 1990](#) local planning authority shall not entertain an application unless the requirements are met. Any person who knowingly or recklessly issues a false or misleading certificate is guilty of an offence. It is therefore the responsibility of the applicant to ensure certificates are completed accurately and with the appropriate evidence in place to support if requested. • **Certificate A – Sole Ownership and no agricultural tenants** This should only be completed if the applicant is the sole owner of the land to which the application relates and there are no agricultural tenants. • **Certificate B – Shared Ownership (All other owners/agricultural tenants known)** This should be completed if the applicant is not the sole owner, or if there are agricultural tenants, and the applicant knows the names and addresses of all the other owners and/or agricultural tenants. • **Certificate C – Shared Ownership (Some other owners/agricultural tenants known)** This should be completed if the applicant does not	

		own all of the land to which the application relates and does not know the name and address of all of the owners and/or agricultural tenants. • **Certificate D – Shared Ownership (None of the other owners/ agricultural tenants known)** This should be completed if the applicant does not own all of the land to which the application relates and does not know the names and addresses of any of the owners and/or agricultural tenants.	
Location Plan	All applications	The location plan must be based on an up-to-date map. The scale should typically be 1:1250 or 1:2500, and wherever possible the plan should be scaled to fit onto A4 or A3 size paper. The location plan should identify sufficient roads and/or buildings on land adjoining the application site to ensure that the exact location of the application site is clear. The application site should be edged clearly with a red line on the location plan. It should include all land necessary to carry out the proposed development (e.g. land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings). A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.	
Site Plan AKA Block Plan	All applications	The site plan / block plan must be at a scale of 1:500 or 1:200 The plan must show the proposed development relative to the site boundaries and other existing buildings on the site; it should also include a north point.	
Plans / Drawings	All applications in so far as they are relevant and proportionate to the proposal.	The following drawings (at a scale of 1:50 or 1:100) shall be submitted: • Existing and proposed elevation drawings (where external construction, demolition or alterations are proposed) • Existing and proposed floor plan drawings (where a new building is proposed or alterations to an existing building's plan)	
Design & Access Statement	Applications for Listed Building Consent		

	Major planning applications Planning applications for 1 or more dwellings in a Conservation Area Planning applications seeking consent for 100sqm or more of building floor space within a Conservation Area (including householder applications) Applications for changes of use, s73 applications and engineering operations are excluded.	A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users. Design and Access Statements can aid decision-making by enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal. The level of detail in a Design and Access Statement should be proportionate to the complexity of the application but should not be long.	
Biodiversity Net Gain Information	Applications for planning permission unless one or more of the BNG exemptions apply [insert link]	The following BNG information must be included in a report with a BNG applicable application: 1. A statement confirming whether the application is BNG applicable or not. 2. The pre-development biodiversity value (of the site) on the date of the application including the completed metric and working calculations. You can use a date earlier than the application date, but you must give valid reasons. 3. A statement confirming whether the habitat on site has deteriorated in the time leading up to the application date. If it has, then an earlier date prior to this deterioration must be used. 4. A description of any irreplaceable on-site habitat. 5. A scaled site plan showing habitat on site. This should be completed in accordance with the Biodiversity Metric Principles included in 'The Statutory Biodiversity Metric User Guide' published by DEFRA. As a minimum this should include completed sections for onsite pre-and indicative post-development habitat delivery.Completed statutory biodiversity metric condition assessments for baseline habitats, including supporting information i.e. species lists and quadrat locations	

		Pre- and *indicative* post- development site plans clearly showing polygons and areas for each habitat used to populate the statutory metric calculation tool using UK Habitat Classification symbology (shapefiles in GIS or AutoCAD may be requested). The plans must be drawn to an identified scale and show the direction of north. Plans using Phase 1 symbology are not acceptable; Polygons within pre- and *indicative* post-development plans should be labelled with a Habitat Reference Number which should also be noted within the associated column within the Statutory Metric Tool
Fire Statement	Residential applications involving buildings of at least seven stories or 18 metres.	The relevant form can be downloaded here [insert link]. Fire statements enable the consideration of information on fire safety issues in so far as they relate to planning matters (for example site layout and access). The information within a Fire Statement should be focussed and concise, specific and relevant to the development, and proportionate to the scale, type and complexity of the proposal.

Definitions.

Major applications: For residential development it means where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Open Space: As defined in the Cheltenham Plan 2020 (Para. 17.20); parks and gardens; natural and semi-natural greenspaces; amenity greenspace; provision for children and young people; allotments; cemeteries; disused churchyards or other burial grounds; and civic spaces including market squares and other hard-surfaced areas designed for pedestrians.

Strategic Sites: application sites falling within (in full or in part) those strategic allocations specified in Part 6 of the Joint Core Strategy, in particular those listed in Table SA1.

Next Review: To be completed no later than 1 January 2027

Requirements by Application Type (for clarity)

Full Planning Application (which includes applications for Technical Details Consent for validation purposes)

National requirements - as above
Local requirements - as above

Outline Planning Applications

National requirements – as above plus the application must also indicate the area or areas where access points to the development will be situated, **even if** access has been reserved.
Local requirements – as above in so far as they relate to the matters which are **NOT** reserved.

Applications for the Approval of Reserved Matters

National requirements – as above
Local requirements – as above in so far as they relate to the remaining matters which **ARE** reserved.

Application Building for Listed Consent

National requirements – as above
Local requirements - as above which for the avoidance of doubt always includes Heritage Statement, and includes an Ecology Report (where demolition is proposed)

Householder Applications

National requirements - as above including for the avoidance of doubt a Design & Access Statement if 100sqm+ in conservation area.
Local Requirements – as above which includes for the avoidance of doubt a Flood Risk Assessment when in Flood Zone 2 or 3; Ecology Report in specified habitats and an Arb' Impact Assessment if tree affected;

Removal or Variation of Condition (s73 application)

National requirements – as above
Local requirements – none (supporting information is likely to be required depending upon the nature of the subject condition/variation but this is not a local validity requirements).

Non-Material Amendment Application (s96a Application)

National requirements – as above
Local requirements – none

Permission in Principle

National requirements – as above
Local requirements – none

Prior Notification / Prior Approval (all types)

National requirements – as specified in the General Permitted Development Order 2015 (as amended) on the date of application.
Local requirements – none

Advertisement Consent

National requirements – as above (as supplemented below)
Local requirements – none

This page is intentionally left blank

Cheltenham Borough Council

Cabinet

Update report – Vacant Units Action Plan

Accountable member:

Cllr Martin Horwood, cabinet member for Economic Development, Culture and Wellbeing

Accountable officer:

Helen Mole, head of place marketing and inward investment

Ward(s) affected:

All wards

Key Decision: No

Executive summary:

In September 2023, Cabinet approved the vacant units and town centre land use efficiency action plan. This report updates members on the progress towards achievement of the objectives set and summarises plans for delivery for 2025/26.

Recommendation: That Cabinet:

- **notes the report updating on progress against delivery of the vacant units action plan to date.**

1. Implications

1.1 Financial, Property and Asset implications

Any funding required for the action plan will come from existing base budget. There are no property implications resulting from the recommendations. Any future funding

opportunities identified will be reviewed by the finance team.

Signed off by: Gemma Bell, director of finance and assets (Deputy Section 151 Officer) gemma.bell@cheltenham.gov.uk

1.2 Legal implications

There are no direct legal implications identified at this stage. The current planning law framework provides a range of options which can be of assistance in reducing the number of vacant units within the town centre. Additionally, the report recognises the importance of maintaining links with the SLP team.

Signed off by: One Legal legalservices@onelegal.co.uk

1.3 Environmental and climate change implications

The action plan was assessed using the council's climate impact assessment tool in September 2023 and this has been updated and is attached as Appendix 3. Continued use of this tool as the work on the action plan progresses will also help ensure projects identified as part of the action plan are meeting council commitments to climate as well as other council priorities.

Signed off by: Maizy McCann, Climate Emergency Officer, maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Increasing the number of affordable homes through our £180m housing investment plan.
- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity.

1.5 Equality, Diversity and Inclusion Implications

An updated equality impact assessment is included at Appendix 2.

1.6 Performance management – monitoring and review

This action plan was created following consultation and engagement with stakeholders, setting out actions, timescales, owners and outcomes. These are monitored via reports to the council's leadership team and members.

---

2 Background

2.1 As set out in the action plan, and the previous Cabinet report, the way people access town centres is continually evolving and it's important that town centre stakeholders monitor and adapt to these changes to ensure the viability of their centres into the future. Through this action plan, Cheltenham Borough Council and Cheltenham BID have committed to a focused and sustained effort to reduce the number and impact of vacant properties in the town centre. The action plan sets out the measures that are being taken alongside the evidence for this approach. It should be noted that the action plan is a dynamic document, subject to ongoing updates and revisions.

2.2 The objectives of the action plan are:

1. Understand the current and ongoing position of empty units in the town centre.
2. Encourage the conversion of empty and underused space to maximise brownfield residential development.
3. Take enforcement against unsightly empty premises to clean up our town centre.
4. Work with landlords, agents, and town centre businesses to ensure that stakeholders understand key issues facing town centre development.
5. Encourage flexibility of the planning system and future strategic planning to bring more residential accommodation to the town centre.
6. Identify opportunities for meanwhile use where appropriate.
7. Highlight opportunities for regeneration and recognise the value of key development sites within the town acting as a catalyst for lasting change.

2.3 At the Cabinet meeting on 19 September 2023, members approved the action plan and set the direction for delivery of the objectives identified.

2.4 The We're Moving to Cheltenham website has been updated to reflect the work on tackling vacant units and the action plan can be found here: https://movingtocheltenham.com/vacant-units

3   Delivery to date

3.1 The following table sets out a summary of the progress against the delivery of the objectives since the adoption of the plan in September 2023:

Objective(s)	Delivery	Next Steps
Objective 1 - Understand the current and ongoing position of empty units in the town centre.	The audit of Cheltenham town centre ground floor units is updated regularly via town centre visits and intelligence gathered from the business community. The current vacancy rate for the streets monitored is currently **7-8%** compared to the national average	Continual monitoring and updating of the audit.

Continue to develop relationships with key stakeholders who can |

	of **14%.** In August 2024, a press release was issued to highlight this which can be found [here](#). A cross-service team has been set up to monitor and update on units within the town centre.	inform and update.
Objective 2 - Encourage the conversion of empty and underused space to maximise brownfield residential development. Objective 5 - Encourage flexibility of the planning system and future strategic planning to bring more residential accommodation to the town centre.	Meetings have taken place with key officers involved with the Strategic Local Plan to update on the vacant units work in the town centre. A team has been created to include members of planning, enforcement, and neighbourhood officer to ensure that opportunities are highlighted and that the action plan is considered in the development of the SLP. The Marketing Cheltenham Team is supporting the development of a topic paper for the Strategic and Local Plan on Town Centre Regeneration. Monitoring and responding to national policy.	Retain involvement with the Strategic Local Plan work, including policy development. Officers are monitoring developments with the High Street Rental Auctions legislation (released in December 2024).
Objective 3 - Take enforcement against unsightly empty premises to clean up our town centre.	Through the audit, a list of vacant units which can be deemed to be unsightly has been compiled and work has been carried out with the enforcement team to identify where the council has the powers to intervene. Two units on the High Street have been contacted and improvements have been made to these. One has subsequently been sold and is now on the market to be let. A further three have been contacted, with no work carried out so far. A Teams group has been created with officers from multiple service areas with the council to share information and provide support. All owners of vacant units have been contacted in writing to request	Continual review and follow up with non-responsive property owners.

	engagement.	
Objective 4 - Work with landlords, agents, and town centre businesses to ensure that stakeholders understand key issues facing town centre development.	Officers have developed working relationships with several property agents across Cheltenham to understand the current market and challenges or opportunities. The idea of a stakeholder group was discussed during the formation of the action plan, but this has not been progressed following feedback from stakeholders as there are already several networks in place to meet this objective. Officers delivered a presentation for the Institute of Place Management highlighting the work being carried out in Cheltenham. An action to develop a 'vacancy toolkit' information pack for landlords in conjunction with Cheltenham BID is being reviewed by the BID chief executive.	Continue to meet and engage with stakeholders. Continue to seek opportunities to identify and share best practice with other authorities. Attend relevant networking events and meetings to continue to develop relationships and highlight opportunities. Follow up on the development of the toolkit with Cheltenham BID.
Objective 6 - Identify opportunities for meanwhile use where appropriate.	Officers monitor vacant units within the town centre to identify where there might be opportunities for meanwhile use and seek to contact landlords or property owners where possible to facilitate this. Letters have been sent to all vacant property owners to seek contact and offer support or advice with improvement / occupation.	There are a number of challenges with this approach as many landlords are not easily contactable or are not interested in supporting meanwhile use, however officers will continue to carry out this activity.
Objective 7 - Highlight opportunities for regeneration and recognise the value of key development sites within the town acting as a catalyst for lasting change.	Officers promote opportunities via CBC routes (e.g. social media and websites). An officer attended the Completely Retail Marketplace conference in September 2024 to highlight opportunities in Cheltenham to potential incoming retailers. Officers work with Gloucestershire County Council and other partners to	Opportunity for further development of the We're Moving to Cheltenham website (subject to resource / funding).

	highlight opportunities in the town to incoming businesses. An officer is available to meet with potential incoming businesses to the town. Four meetings took place in 2024.	

3.2 The government has set ambitious targets for delivering more homes with the reintroduction of housing targets. The council supports this agenda by encouraging redevelopment and regeneration, testing densities to maximise the use of land and supporting conversion of town centre uses to housing where that is appropriate and where it may reduce the number of vacancies and increase the supply of housing.

4 Reasons for recommendations

4.1 Members are asked to note the above update on activity.

5 Consultation and feedback

5.1 Engagement in the creation of the action plan took place with partners including the Cheltenham Chamber of Commerce, Cheltenham Economic Advisory Board, Cheltenham Civic Society, property owners and landlords, and agents promoting the town centre.

5.2 There has been ongoing engagement with Cheltenham BID, Cheltenham Chamber of Commerce, property owners and agents to support the delivery of the action plan.

6 Key risks

6.1 Risks are highlighted below in Appendix 1.

6.2 The key challenge or risk with delivering any positive intervention in vacant units continues to be a lack of engagement from landlords and property owners. All property owners for vacant units have been sent a letter requesting contact and engagement. No responses have been received so far, but these efforts will continue. From conversations with other places also looking at vacancies, we know this is very common and difficult to overcome.

Report author:

Helen Mole, Head of place marketing and inward investment,
helen.mole@cheltenham.gov.uk

Appendices:

1. Risk Assessment
2. Equality Impact Assessment
3. Climate Change Impact Assessment

Background information:

- Cabinet Report 19 September 2023
  https://democracy.cheltenham.gov.uk/documents/s45033/Vacant%20Units%20and%20Town%20Centre%20Land%20Use%20Action%20Plan%20-%20officer%20report.pdf

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	Lack of engagement from property owners	Helen Mole	5	3	15	Accept the risk.	Contact all owners of vacant units to attempt to engage with proactive response to vacancies	Helen Mole	Ongoing
	Lack of engagement from partners including internal and external stakeholders	Helen Mole	4	1	4	Accept the risk.	Partners are already engaged and share mutual objectives. Continue relationship management.	Helen Mole	Ongoing
	Lack of engagement from developers	Helen Mole	4	3	12	Reduce the risk.	Continue engagement and ensure attendance at local property forums. Understand and highlight the opportunities.	Helen Mole. Planning department.	Ongoing.

Appendix 2:   Equality Impact Assessment

---

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Helen Mole	Service Area: Place Marketing and Inward Investment
Title: Head of place marketing and inward investment	Date of assessment: January 2025
Signature: *Helen Mole*	

b. Is this a policy, function, strategy, service change or project?

	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project

Is this new or existing?	**Other**

Please specify reason for change or development of policy, function, strategy, service change or project

An update on the delivery of an existing action plan

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To identify vacant units in the town centre and work together proactively with town centre stakeholders to implement a series of actions
Objectives:	- Understand the current and ongoing position of empty units in the town centre - Encourage the conversion of empty space to residential to maximise brownfield development - Take enforcement against unsightly empty premises - Work with landlords, agents, and town centre businesses to ensure that stakeholders understand key issues facing town centre development - Encourage flexibility of the planning system and future strategic planning to bring more residential accommodation to the town centre

	- Identify opportunities for meanwhile use where appropriate - Highlight opportunities for regeneration and recognise the value of key development sites within the town acting as a catalyst for lasting change
Outcomes:	More awareness of vacancy rates in the town centre and a proactive approach to responding to these.
Benefits:	A more attractive and welcoming town centre.

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**No**
Do you expect the impacts to be positive or negative?	**No impact expected**
Please provide an explanation for your answer:	
A more attractive town centre with fewer unsightly vacant units will positively impact the user experience and support the economy. It is anticipated that this will impact all users of the town centre equally.	

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

f. Identify next steps as appropriate

Stage Two required	**No**

Vacant Units and Town Centre Land Efficiency Action Plan

Key

(dark green)	Significant and/or long-term positive impact identified. No changes needed.
(light green)	Slight or short-term positive impact identified. No changes needed but could be reviewed to improve.
(grey)	Not applicable or no cause for concern.
(amber)	Slight or short-term negative impact identified. Review to identify possible improvements.
(red)	Significant and/or long-term negative impact identified. Changes needed before proceeding.

This summary of the CIAT should be used to aid your decision making. Please note that red/amber segments simply mean that mitigations and changes should take place not that the project cannot go ahead.

Environmental	Scores	Justification	Recommendation
GHGs	0	The action plan seeks to identify opportunities for development which would then have an impact on GHG, but it does not directly control these. If opportunities for development are identified in the future, these will be subject to separate assessment at that time.	0
Air quality	0	0	0
Sustainable Transport	2	If the desired objective of increasing town centre living is achieved, this will encourage sustainable transport as people will live near to amenities / workplaces. However there is no direct control over this through this action plan as it seeks to influence opportunities for town centre living, not deliver these.	0
Land use change	0	Any land use changes that come about as a result of the influence exerted by this action plan will be to convert existing retail or brownfield land, not remove grassland or green spaces.	0
Biodiversity	0	0	0
Soil and waterway health	0	0	0

Climate Change Adaptation	0	0	0
Energy Use	0	Although sustainable development will be encouraged, this will not be directly in the control of this project.	0
Sustainable Materials	0	0	0
Waste	0	0	0

Social	Scores	Justification	Recommendation
Food	2	If the desired objective of increasing town centre living is achieved, this will support access to healthy and affordable food as people will live near to amenities / retail. However there is no direct control over this through this action plan as it seeks to influence opportunities for town centre living, not deliver these.	0
Health	2	If the desired objective of increasing town centre living is achieved, this will support health and wellbeing as people will live near to amenities / workplaces and will be more likely to use active travel. However there is no direct control over this through this action plan as it seeks to influence opportunities for town centre living, not deliver these.	0
Housing	2	If the desired objective of increasing town centre living is achieved, developers will be encouraged to use sustainable building practices and create efficient homes. However there is no direct control over this through this action plan as it seeks to influence opportunities for town centre living, not deliver these.	0
Education	0	0	0
Community	2	If the desired objective of increasing town centre living is achieved, this will positively impact the sense of place in the town centre as more people will live there and this will provide safety and security. However there is no direct control over this through this action plan as it seeks to influence opportunities for town centre living, not deliver these.	0

Culture	2	A reduction in the vacant units in the town centre will lead to a more vibrant and viable town centre which will support cultural activities.	0	
Accessibility	0	0	0	
Local Economy and Jobs	8	Reduced vacancies in the town centre, a cohesive business support programme for businesses.	0	
Safety	2	If the desired objective of increasing town centre living is achieved, this will positively impact the sense of place in the town centre as more people will live there and this will provide safety and security. However there is no direct control over this through this action plan as it seeks to influence opportunities for town centre living, not deliver these.	0	
Equity	2	If opportunities for meanwhile or pop-up use for empty units are found, a fair, accessible and transparent process will be followed to identify potential users of this space. If meanwhile or pop-up uses are identified, or new space is developed, this must be accessible for all groups.	0	
Democratic Voice	1	Engagement with stakeholders. When inviting stakeholders to be part of the group, we will ensure this group is representative. Consultation or engagement on meanwhile use activity, if carried out, must be carried out in a way which engages a representative range of respondents.	0	

This page is intentionally left blank

Cheltenham Borough Council

Cabinet - 18 February 2025

Volunteering Policy and Processes

Accountable member:

Cllr Victoria Atherstone, Cabinet Member Safety and Communities

Accountable officer:

Claire Hughes, Director of Governance and Customer Services

Ward(s) affected:

All

Key Decision: No

Executive summary:

Cheltenham Borough Council (CBC) is very fortunate to be supported by the good will of local volunteers offering their time to help in green spaces and with events and projects. There is a clear benefit to CBC in receiving this much needed support and to the volunteers themselves in being able to make a positive difference to their town.

The council's volunteering policy was put in place in 2019 and has now been reviewed and updated to ensure it is up to date and robust. The number of volunteers and constituted volunteer groups volunteering with the council has increased significantly and continues to do so with new opportunities arising from housing services being brought back in house.

The revised policy includes the adoption of a new partnership agreement that will be entered into with the constituted groups regularly volunteering on council-land and that are working under their own insurance. The agreement will set out the responsibilities and commitments on both sides. This will reduce the capacity demands on the Green Space Development team through enabling the groups to work more autonomously through a clear, safe, supportive and documented process.

Page 136

Recommendations: That Cabinet:

1. **adopts the following:**
   - **The Gloucestershire Volunteering Collaborative definition of volunteering (see section 3.1)**
   - **Cheltenham Borough Council's updated Volunteer Policy (Appendix 3)**
   - **Template partnership agreement with constituted groups (Appendix 4)**
   - **Cheltenham Borough Council's updated Volunteer Handbook (Appendix 5).**

2. **delegates authority to the Participation and Engagement Team Leader in consultation with the Cabinet Member for Safety and Communities and the Council's Leadership team to keep the policy and supporting documentation under review and to make changes as necessary to reflect best practice and legal and operational requirements.**

---

1. Implications

1.1 Financial, Property and Asset implications

There are no financial implications identified as a result of these recommendations.

Signed off by: Ela Jankowska, Finance Business Partner, ela.jankowska@cheltenham.gov.uk

1.2 Legal implications

Volunteers do not have the rights of employees or workers. To minimise the risk that a volunteer may claim to be an employee, it is important that the Council have a clear volunteer policy, which clearly defines what it is to be a volunteer. The policy should note that any payments made to the volunteer are strictly to cover expenses.

The Council has duties under the Health and Safety at Work Act 1974 to ensure that volunteers undertake tasks in safe conditions and are provided with competent advice on health, safety and welfare matters.

The Council also has safeguarding duties towards those who volunteer and those individuals or groups who come into direct contact with the volunteers and must ensure its Safeguarding Policy is adhered to at all times, including undertaking DBS checks where necessary.

Ensuring volunteers are covered by insurance, whether the Council's own or that of the externally constituted groups is also important.

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

1.3 Environmental and climate change implications

As an update to an existing policy, there are no environmental and climate change implications arising. It should be noted that the policy supports the safe and well managed provision of volunteering opportunities in the council's parks and green spaces which have a positive impact on the maintenance and biodiversity of those spaces.

Signed off by: Maizy McCann, Climate Officer, maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

There are no EDI implications as this is an update to an existing policy.

1.6 Performance management – monitoring and review

It is proposed that the Volunteer Policy and associated documents (partnership agreement, application forms, staff guidance and volunteer handbook) is reviewed every 3 years to ensure it is working effectively

---

2 Background

2.1 Cheltenham Borough Council is very fortunate to be supported by the good will of local volunteers as stated in the executive summary above.

2.2 The council adopted a Volunteer Policy in 2019 in order to provide a clear process for recruiting and managing volunteers. Previous to 2019, different teams and departments had developed their own processes and there had been no consistency across the organisation.

2.3 The volunteer policy has now been reviewed and updated to ensure it is up to date and robust as the number of volunteers and constituted volunteer groups volunteering with the council has increased significantly and continues to grow.

2.4 The updated policy outlines the process for recruiting and managing both individual volunteers who are supervised directly by CBC officers and constituted

groups who register to volunteer for CBC under their own public liability insurance and are responsible for their own volunteers in carrying out tasks agreed with CBC. Volunteering application forms can be viewed on the council's website: www.cheltenham.gov.uk/volunteering

2.5 A volunteer disclaimer is included in both the individual and group volunteering application forms. The volunteer disclaimer between CBC and their volunteers / constituted groups managing volunteers is a useful way of clarifying the expectations of both parties.

2.6 Once a volunteer or constituted group has registered with CBC and been matched with a volunteering opportunity, the CBC volunteer supervisor for the role liaises with them directly, including induction, health and safety briefing and supervision.

2.7 There are currently over 260 individuals registered on the volunteer database and over 30 constituted groups. The majority of the volunteers and constituted groups volunteer within the Green Space Development team.

2.8 The constituted groups include groups such as 'friends of' groups who volunteer regularly on council land through the Green Space Development Team and also teams from businesses, organisations and educational establishments who come and volunteer as a one off for example as part of their corporate social value policies.

3 Changes to the existing volunteer policy and process

3.1 **Definition:** As part of the review of the policy, CBC is asked to adopt the Gloucestershire Volunteering Collaborative definition of volunteering. The Collaborative is a group of representatives from the local voluntary, community and social enterprise (VCSE) sector, public sector and private sector, along with volunteers themselves, working together strategically to improve the way volunteering works in the county. It founded Go Volunteer Glos which is the central hub for promoting and finding volunteering opportunities in Gloucestershire. The Collaborative's definition of volunteering is:

Volunteering encompasses any unpaid activity where individuals willingly offer their time, skills and expertise to benefit others or contribute to a cause, organisation or community.

3.2 **Partnership agreement:** The revised policy includes the introduction of a new partnership agreemen**t** (appendix 4) with the constituted groups who volunteer regularly on council land under their own insurance, to set out the responsibilities and commitments on both sides. This will reduce the capacity demands on the Green Space Development team through enabling the groups to work more

autonomously through a clear, safe, supportive and documented process. The agreement will be signed by the group leader and be in place for 3 years. It will form the basis of annual reviews between CBC officers and each group where work plans are agreed.

3.3 **GDPR and processing new volunteer applications:** Volunteer data will be stored securely on Microsoft Lists and accessed through Microsoft Teams channels by the relevant officers. This has been set up by the Commercial and Business Development Team and will make it much easier to process new applications, search the data and will also enable the relevant officers to have secure access to volunteer contact information via smartphone on site in case of emergency.

3.4 The Green Space Development team will be able to process their own volunteer applications through their own Teams channel. Where convictions are declared in a volunteer application or there are concerns about the suitability of the volunteer, the application is referred to the Safeguarding and Partnerships Manager.

3.5 The application forms make clear that volunteer and group data is stored in line with the CBC volunteers' privacy statement. Within this statement it is made clear that their information is kept by the council for a maximum of 5 years following the conclusion of their participation in volunteering. The Participation and Engagement Team Leader will continue to have access to all volunteer data and be responsible for ensuring that it is kept up to date.

3.6 The council recognises that children and young people may want to get involved in volunteer activities, and as a council it is important that we encourage them to become committed volunteers both now and in the future, but this must be balanced against making sure that organised volunteering must have the right safeguarding and protections in place to ensure children, young people and families are safe. Unfortunately, this means that many volunteering activities are not suitable for children to attend. Therefore, the updated policy reflects this, by putting in the right safeguards around children taking part.

3.7 However, the council will continue to work with schools and consider one-off activities and schemes that will give opportunities for young people to take part in a way that keeps them safe and makes sure that their experience is a positive one.

3.8 The council will on occasion deliver specific schemes that work with young people or deliver projects or programmes that benefit young people. These activities will all require their own safeguarding and health and safety risk assessments to be prepared and signed off in line with the council's policy framework to ensure that the young people's experience is a safe and positive

one.

3.9 CBC Volunteers are provided with a Volunteer Handbook (Appendix 5) which outlines what they can expect from CBC while they are volunteering and what CBC asks of them.

4 Reasons for recommendations

4.1 To ensure CBC's volunteer policy is up to date and robust to enable the smooth management of increasing numbers of volunteers and constituted groups volunteering for CBC, whilst also ensuring that volunteers remain safe whilst volunteering and that their data remains secure.

4.2 The updated policy reflects the more efficient and effective methods of storing and accessing data (via Microsoft Lists and Teams).

4.3 The partnership agreement with constituted groups who are volunteering regularly on council land will make clear the responsibilities on both sides and enable the groups to get on with work in their agreed work plans more autonomously through a clear, safe and documented process.

5 Alternative options considered

5.1 CBC could continue without an agreement with the constituted groups volunteering on our land but there is a risk associated with this from a health and safety, safeguarding, GDPR and insurance angle because it places the onus on officers to keep track of increasing numbers of groups without an agreement in place.

6 Consultation and feedback

6.1 Angela Gilbert from Gloucestershire Rural Community Council has helped to develop the updated policy and supporting documents. Angela supports the voluntary and community sector in developing robust policies and procedures and has considerable experience in supporting volunteer management.

6.2 The council's Health and Safety Business Partner has also helped to develop the policy and associated documents and has provided guidance in reviewing the processes of managing of the Green Space Development volunteers safely and efficiently.

6.3 The council's Commercial and Business Development team has provided the solution to storage of the volunteer database which is now managed securely on Microsoft Lists and accessed through Microsoft Teams channels by the relevant officers.

7 Key risks

7.1 Without an up-to-date Volunteer Policy in place, there is a risk that the policy does not protect CBC and its volunteers from a health and safety, GDPR, safeguarding and insurance perspective. There is also a reputational risk if CBC is seen to be falling short on how it manages the volunteering process.

7.2 Without a partnership agreement in place with the constituted groups, CBC does not have a clear process for managing the groups working on council land under their own auspices which creates risk around health and safety.

Report author:

Helen Down, Participation and Engagement Team Leader:
helen.down@cheltenham.gov.uk

Appendices:

i.	Risk Assessment
ii.	Equality Impact Assessment – Screening
iii.	CBC Volunteer Policy
iv.	Template partnership agreement with constituted groups
v.	CBC Volunteer Handbook

Background information:

N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If a volunteer has an accident and the relationship between the council and volunteer is not clear, nor has been properly inducted the volunteer, there is a risk that this may lead to sanctions from the health and safety executive	Claire Hughes	3	3	9	reduce	Implement the updated Volunteer Policy to help ensure that volunteers remain safe when volunteering with the council		
	If a volunteer uses the opportunity to develop inappropriate relationships with children or vulnerable adults, the council could face legal challenge or sanction from external partners	Claire Hughes	3	2	6	reduce	Implement the updated Volunteer Policy to ensure sufficient safeguards in place to ensure volunteers are effectively supervised		

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If CBC allows constituted groups to volunteer for the organisation without a proper agreement in place and a subsequent issue arises it will cause a reputational issue for the Council	Claire Hughes	3	2	6	Accept	Implement the partnership agreement with constituted groups to ensure responsibilities on both sides are clear	Adam Reynolds	From February 2025
	If the personal details of a volunteer (which could include sensitive health and/or criminal record information) are not stored correctly in line with our GDPR obligations, the council could face sanction from the Information Commissioners Office	Claire Hughes	3	3	9	Accept	Implement the updated Volunteer Policy to help ensure that volunteer's personal details are managed in line with GDPR.	Helen Down	From February 2025
	If a volunteer or constituted group of volunteers has an unsatisfactory experience volunteering	Claire Hughes	2	2	4	Accept	Implement the updated volunteer policy and partnership agreement with	Helen Down / Adam Reynolds	From February 2025

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	for the council, this may impact on the reputation of the council and also affect recruitment of other volunteers.						constituted groups to ensue a consistent approach and mutual expectations between CBC and its volunteers.		

Appendix 2: Equality Impact Assessment (Screening)

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Helen Down	Service Area: Communities, Wellbeing and Partnerships
Title: Participation and Engagement Team Leader	Date of assessment: 17.01.25
Signature: H Down	

b. Is this a policy, function, strategy, service change or project?

Policy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Volunteer Policy

Is this new or existing?	**Already exists and is being reviewed**

Please specify reason for change or development of policy, function, strategy, service change or project

Policy has been in place since 2019 so needed review. Part of the review is implementing a new partnership agreement with constituted groups volunteering regularly on council land under their own insurance to make clear the responsibilities on both sides.

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To ensure the Volunteer Policy is up to date and robust to reflect the increasing number of volunteers.
	To implement a new partnership agreement with constituted groups to ensure consistency in how they are managed.

Objectives:	
Outcomes:	A more consistent approach to managing constituted groups volunteering regularly on CBC land.
Benefits:	CBC volunteers and constituted groups volunteering are treated consistently through a clear process.

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**No**
Do you expect the impacts to be positive or negative?	**No impact expected**
Please provide an explanation for your answer:	
This is an update to an existing policy.	

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

f. Identify next steps as appropriate

Stage Two required	**No**
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

Cheltenham Borough Council's Volunteer Policy

Introduction and Welcome

We are immensely proud of our volunteers who, through their efforts, are putting something back into society, working with our staff to make Cheltenham a better place, whilst also learning new skills and socialising with others. Volunteers complement and add value to the services the council provide and we are thankful for the time they give.

The council adopted a vision that Cheltenham is a place where everyone thrives. Within our place vision we acknowledge the importance of volunteering, making an explicit statement that

"*People and our communities thrive when there are more opportunities to volunteer, to give time and effort to making Cheltenham and its organisations and communities a better place.*"

What is volunteering?

The council supports the Gloucestershire Volunteering Collaborative definition of volunteering which is:

Volunteering encompasses any unpaid activity where individuals willingly offer their time, skills or expertise to benefit others or contribute to a cause, organisation or community.

There is no contractual obligation on the volunteer to provide their services.

What our volunteering policy seeks to do:

The council recognises the significant contribution that volunteers give to making Cheltenham and its organisations and communities a better place. In doing so, it has a duty to ensure that that the experience of those who volunteer is a safe and positive one, with the right amount of support and supervision.

The council also recognises the benefits which volunteering provides its employees, and though the council's own Employee Volunteering Policy supports employees to 'give something back' to their community, whilst at the same time enhancing flexibility and development opportunities for its staff through providing up to two days paid time off for volunteering in the community.

The Volunteer Policy sets out the standard processes and procedures of the council's volunteer programme. These include:

1. Identifying volunteering opportunities
2. Recruitment and selection of volunteers
3. Induction and training
4. Health and Safety
5. Safeguarding
6. Confidentiality and Data Protection
7. Ongoing Support

1.　　Identifying volunteering opportunities

Ideas for volunteering opportunities can come from either members of staff, elected members or from potential volunteers themselves. However the opportunity arises, it is important that the following steps are followed to ensure that the volunteering opportunity is a safe and positive one, for both the volunteer and for the council.

2.   Recruitment and Selection of Volunteers

The council's volunteer supervisor (for the specific volunteering opportunity) should produce a volunteer role description. This will describe the role so that any potential volunteers can assess their suitability before applying. The role description should include:

- title of role
- purpose of role
- a broad outline of tasks and activities to be undertaken
- any targets or measurements of performance
- the name of the person who the volunteer reports to
- location and volunteering hours
- how the role fits in with the work of the organisation
- expectations of behaviour and dress (if appropriate)
- any skills, qualifications and personal attributes required – essential and desirable

The role can then be advertised on the council's website:
https://www.cheltenham.gov.uk/info/78/job_vacancies

The council's volunteer supervisor will also need to be mindful of the need to ensure that the purpose of the role is lawful and within the remit of Cheltenham Borough Council.

Individual volunteers
An individual volunteer is someone who volunteers directly for the council, rather than volunteering as part of a constituted group which volunteers under its own insurance.

Volunteers should apply for roles using the online council volunteer application forms:
www.cheltenham.gov.uk/volunteering

Due to the high number of the council's volunteers who volunteer with the Green Space Team, there is a separate application form for those who want to solely be a Green Space volunteer which asks questions relevant to that role only.

The application form is critical as it enables the volunteer to set out the skills they could bring to the role and any issues that might restrict their participation such as their health and wellbeing. The form also asks for some personal data such as age; asks about criminal convictions and gains consent from the applicant to ensure Data Protection compliance.

Completed forms are reviewed by the Communities, Wellbeing and Partnerships Team (and Green Space Team for Green Space roles) and shared with the lead council officer for the volunteering opportunity.

Group volunteering
Externally constituted volunteer groups, doing regular activities connected with council land (for example Friends of groups working in council parks/gardens), with their own public liability insurance, will need to complete the online council group volunteering form (available at www.cheltenham.gov.uk/volunteering) as a declaration to confirm that they have their own safeguarding policy, risk assessment and insurance.

A partnership agreement with constituted groups will also be adapted for each group to outline the commitments on both sides and will be signed on behalf of the group and by the council.

Groups (whether constituted or not) that have no public liability insurance will be asked to either get their own insurance or ensure that their volunteers register individually as council volunteers when undertaking council activities.

The volunteer will need to complete the online council volunteer application form. Council staff will then be responsible for supervising the activity and task.

If businesses, local organisations, and educational establishments wish to provide volunteers for a one-off event or activity, then the organisation will be required to have their own risk assessment and public liability insurance that will cover their staff acting as volunteers and to also complete a group volunteering form as a disclaimer.

One off individual volunteers:

There may be instances where more informal volunteering is appropriate and more appealing to volunteers. For example, at a tree planting activity where many volunteers may be those who have walked past and expressed a desire to take part. In this situation, volunteers will be asked to complete a declaration to sign in to the activity which confirms the volunteer understands what is expected of both parties and ensures they are covered by the council's public liability insurance for the activity. These one-off opportunities are the only ones where individuals under 18, aged 16-18 only, may take part, ONLY if they are accompanied and signed in by a parent or guardian.

For one-off volunteering activities the usual process of recruitment, induction and volunteer management does not apply. However, all volunteers are to be treated with respect and support during the activity and should have a named point of contact on the day for any questions or concerns. Staff should follow the 'Staff Guidance on managing volunteers' documents to ensure all safeguarding measures are met.

Young people volunteering:
Council volunteers must be 18+ years old. The only exception is for one-off volunteering opportunities (please see section above) where individuals aged 16-18 can take part, but must be accompanied at all times and signed in by a parent or guardian.

The council will on occasion deliver specific schemes that work with young people or deliver projects or programmes that benefit young people. These activities will all require their own safeguarding and health and safety risk assessments to be prepared and signed off in line with the council's policy framework to ensure that the young people's experience is a safe and positive one.

Volunteers are encouraged not to bring children and young people with them when they are volunteering, as they are the responsibility of their parents at all times which may reduce their ability to focus safely on the task in hand. If it is essential for the volunteer to bring a child or young person (due for example to childcare arrangements falling through at the last minute and the volunteering role being essential) then the child or young person is not a volunteer and the volunteer supervisor should assess the risk and mitigate the risks accordingly. This may mean sending the volunteer home if the risk of the child being on site cannot be effectively mitigated.

3.   Induction and Training

The lead council officer for the volunteering opportunity must provide all volunteers with an introduction to the organisation as well as induction and training tailored to the volunteering opportunity. All volunteers will be provided with a copy of the volunteer handbook.

4.   Health and Safety

We have a duty of care to avoid exposing our volunteers to health and safety risks. All volunteers will be made aware of our Health and Safety Policy and any practical safety concerns as part of their induction. Volunteers are expected to comply with the Council's Health and Safety Policy.

All volunteer roles will be risk assessed, covering both the tasks involved and the environment in which they will be conducted. In addition, where a volunteer makes us aware of a pre-existing medical condition or disability, an individual risk assessment may also be necessary.

Volunteers must sign the volunteer declaration on their application form. This provides them with basic accident cover and also indemnifies the volunteer against any claim made against them or the Council whilst carrying out their activity.

Where volunteers drive as part of their voluntary activity, and use their own vehicle, they must ensure they possess the relevant class of insurance. Further guidance should be sought from the volunteer's own insurance company. Supervisors must check and record this documentation if use of a vehicle is required.

5.   Safeguarding

All supervisors must ensure that volunteers are aware of, and have received appropriate training in the Council's Safeguarding Policy.

Disclosure and Barring Service (DBS) checks will be carried out on any volunteer who in the course of their activity has regular, unsupervised, contact with the same group of children or young people. A DBS check will also need to be carried out on volunteers who care for or deal with the personal affairs of any vulnerable adult. Further guidance can be found in the council's Safeguarding Policy. Volunteers who require a DBS check will need to register for the free updates service to ensure it is kept up to date: https://www.gov.uk/dbs-update-service

6.   Confidentiality and Data Protection

All supervisors must ensure that during induction volunteers are aware of confidentiality and data protection policies. If their role requires, volunteers must receive appropriate training, for example information governance training.

All information about volunteers and groups will be stored in line with the council volunteers' privacy statement. Volunteers will be asked to reconfirm their details and volunteer declaration every 5 years. There is a commitment that this information is kept by the council for a maximum of 5 years following the conclusion of the volunteering opportunity.

The Participation and Engagement Team Leader role will be responsible for the collation and management of this information including keeping the list of volunteers and their consents up to date.

In addition, any volunteer can contact the Participation and Engagement Team Leader at any time to withdraw from the list of volunteers.

7. Ongoing Support

All volunteers will receive appropriate support and regular supervision in their activity. The level of supervision will match the nature of the role and the experience of the volunteer. All volunteers will have a nominated volunteer supervisor, someone they can have regular access to if problems arise or when help and support is needed.

As volunteers are not employees, they are unable to use the council's grievance policy and procedure. However, they are entitled to use the council's complaints procedure.

Complaints by volunteers should be raised in the first instance with their volunteer supervisor and dealt with informally where possible. Where appropriate, the complaint will be investigated fully by their supervisor, or if the complaint is against their own supervisor, by another volunteer supervisor or their line manager.

If a complaint is brought against a volunteer, this will be investigated by the relevant supervisor. Every attempt will be made to resolve the matter as quickly and informally as possible. If the issue cannot be satisfactorily resolved, then the volunteer may be told their services are no longer required with immediate effect.

8   Expenses

The council is committed to paying reasonable 'out of pocket' expenses ensuring that potential volunteers are not excluded due to financial reasons. However, these need to be agreed in advance with relevant managers before the volunteer commences their activity. Where expenses are not agreed, volunteers must be made aware of this at the first opportunity in the recruitment process.

9   Volunteers in Receipt of Benefits

It is the responsibility of the volunteer to establish whether volunteering is going to affect their entitlement to any social security benefits. Further advice should be obtained from the Department of Work and Pensions (DWP), Job Centre Plus, or Citizens Advice.

10   Moving On

The council welcomes feedback and encourages volunteers to offer ideas for improvements. Volunteers who choose to stop volunteering at any time will also be invited to provide feedback before they move on.

Volunteers who are leaving the organisation and who have made a regular commitment to it should be offered an exit interview, reference and/or statement of their achievements to ensure that their services are properly and formally appreciated.

Where appropriate, the role and placement of the volunteers may be terminated by the supervisor at one week's notice, or immediately where inappropriate behaviour has occurred. In all cases, the volunteer will be entitled to an explanation of the decision and action taken.

11   Review
This policy will be reviewed within 36 months of its adoption.

This page is intentionally left blank

PARTNERSHIP AGREEMENT

XXX – XXX (3 years)

BETWEEN

CHELTENHAM BOROUGH COUNCIL

AND

INSERT NAME OF CONSTITUTED GROUP

Signed:

………………………………………………….…………

(GREEN SPACE MANAGER on behalf of Cheltenham Borough Council)

…………………………………………………......... Position: ……………………………………………………………….

(on behalf of XXXXXXX CONSTITUTED GROUP)

Date …………………………………………..

1. Introduction

Cheltenham Borough Council's Green Space Development team (**GSD**) has a long and active history of collaboration with Friends of Parks and Green Spaces Groups (**Friends Groups**). They are an important part of championing, developing, and supporting the maintenance and improvement of our green spaces. Green spaces include parks and gardens, green corridors, amenity green paces, playing fields, nature reserves and play areas.

We encourage the establishment of Friends Groups for all these types of green spaces, small and large.

Working together, GSD and its Friends Groups maintain and enhance the environment within our parks and green spaces across the town. A strong partnership based on trust and shared values is vital in achieving this. The purpose of this agreement is to lay out the shared values, roles, responsibilities, and ways of working for a collaborative, transparent, open, inclusive, and trusting partnership.

2. Aims and outcomes of this agreement

This agreement provides a framework for relationships between GSD and the Friend Group named at the start of this agreement (**Friend Group**). It is a code of conduct for partnership working which sets out a number of principles and tasks in paragraph 5 of this agreement by which partners should work together effectively to help create the following:

- **Equity** in the ways of working between GSD and Friends Groups. This will enable the council to work with more Friends Groups.
- **Transparency**: to ensure that the commitments made within the Green Spaces Strategy, and those within this agreement, are met.
- **Good governance arrangements:** to ensure that those working with GSD on representing, championing, and working with our Green Spaces are doing so within any laws, rules and regulations required (for example, with good financial arrangements, relevant insurances, the correct permissions, and agreements for undertaking work on Council owned or managed land).
- **Clear expectations:** this agreement sets out the roles and responsibilities of the parties to this agreement and what GSD can offer the Friend Groups in terms of time and resource. This will ensure that the council's resources are planned and managed well, and that the focus of officer time is spent on delivering the commitments within the Green Spaces Strategy.

The outcomes that will be achieved through a shared commitment to this agreement include stronger partnerships, safe working practices, the optimisation of resources, improved communication, and better trust and respect between the parties to this agreement.

3. Shared values

The following shared values underpin this agreement:

- **Respect:** Effective partnerships are built on mutual understanding and an appreciation of the differences and challenges faced by the parties. The parties to this agreement have distinct but complementary responsibilities in meeting the commitments set out in this agreement.
- **Independence:** The independence of the Friends Group is recognised and supported.
- **Honesty:** Strong partnerships can only be built and maintained through open communication. Full and honest discussions should be the basis for resolving issues should they arise.
- **Fairness and equality:** Fairness for everyone, regardless of their background, is a fundamental goal, and GSD and the Friends Group will look to promote equality and human rights, regardless of race, age, disability, gender, sexual orientation, faith, health, socio economic status or other characteristics protected by the Equality Act 2010.
- **Diversity:** GSD and the Friends Group value the diversity and support the involvement of volunteers from all sections of the community.
- **Cooperation and collaboration:** GSD and the Friends Group will work in a spirit of co-operation and collaboration. This will improve the quality of decision making and help deliver better outcomes.
- **Taking action** - effective partnerships rely on the commitment of the parties to this agreement to move towards the shared goals and ambitions.

4. Monitoring and dispute resolution

4.1 The following principles will frame how the partnership agreement operates in practice:

   a. This agreement will be reviewed after 3 years, or when legislation or new best practice mean that there is an amendment needed and submitted to the relevant decision-making bodies for approval.
   b. All parties to the agreement will jointly monitor implementation of the agreement through an annual review meeting to be held at the GSD offices.
   c. The Friends Group signatory will be an overall 'Agreement Guardian'. The Green Space Manager will fulfil the same role on behalf of GSD.
   d. Should any disputes arise regarding operation of the agreement that cannot be settled simply, then they can be referred to the relevant 'Guardian' to resolve.

5. Partnership Commitments

Equity in the ways of working between GSD and Friends Group

Cheltenham Borough Council GSD will:	Friends of XXX will:
Provide an Induction for new Friends Groups	Ensure that all members adhere to the Shared Values at all times.

Transparency in the ways of working between GSD and Friends Group

Cheltenham Borough Council GSD will:	Friends of XXX will:
Hold an annual meeting with the Friends Group to discuss and agree projects for the year ahead.	Hold regular recorded informal discussions to be held with the Friends Group Volunteer Co-ordinator regarding planning for up coming working groups.
Keep the Friends Group informed of any required changes to the workplan or agreed projects in a timely manner.	Provide minutes of their AGM and any other relevant recorded meetings, highlighting those items discussed to the Council annually

Good governance arrangements

Cheltenham Borough Council GSD will:	Friends of XXX will:
Keep Friends Group informed of any changes to Council Volunteer policy or Health & Safety requirements.	Be responsible for storing the personal data of its volunteers, including their health information and emergency contact details in accordance with GDPR legislation.
Provide guidance for Friends Groups on how to ensure good governance (via the CBC website and signposting to support from Gloucestershire Rural Community Council).	Ensure that its organisation has an accurate and up to date safeguarding policy in place and has no reason to believe that any of our volunteers are barred from the volunteering activity in accordance with the provisions of the Safeguarding Vulnerable Groups Act 2006 or any subsequent amendment to that Act.
	Be responsible for the health, safety and wellbeing of our volunteers and ensuring a risk assessment is undertaken for all activities and that relevant Health & Safety legislation is followed: Volunteering: How to manage the risks - HSE Be responsible for ensuring that its members are aware that: • they are personally responsible for their own health, well-being and safety, and that they should only perform tasks that they are fit and able to undertake • that as volunteers engaged in voluntary activities they have a General Duty of

	Care towards members of the public, fellow volunteers and Council staff • they should act with reasonable care and attention should they be required to use tools and equipment that are supplied by the Council or supplied by its organisation
	Cover its activities in volunteering as an organisation on Cheltenham Borough Council property and / or at Council run events by its own public liability insurance policy and provide a copy annually to the Council
	Ensure that where it works with business groups or educational establishments providing volunteers, that they are covered by their own public liability insurance and have completed risk assessments for the activities they will be undertaking.
	Record any volunteering related accidents and report them to CBC.
	Ensure our volunteers receive the appropriate training needed to carry out the tasks in the agreed work plan.

Clear expectations

Cheltenham Borough Council GSD will:	Friends of XXX will:
Include the expectations in the induction documents referred to above.	Meet the expectations discussed and agreed by both parties at the Induction Meeting
Expectations to be discussed and recorded, signed and dated by both parties at the Induction Meeting.	Work within those expectations when agreeing / carrying out volunteer works for Green Space Development.
Work within the agreed expectations when agreeing / carrying out volunteer works with the Friends Group.	

6 Legal Status

6.1 Whilst the parties to this agreement have every intention of complying with its provisions, it is not intended to be a legally binding contract and it may be cancelled at any time by discretion of either party.

6.2 Neither party intends for any employment relationship to be created as a result of this agreement either now or at any time in the future in respect of the volunteers.

This page is intentionally left blank

CHELTENHAM
BOROUGH COUNCIL
Volunteer Handbook

WELCOME

Thank you for choosing to volunteer with Cheltenham Borough Council. We are immensely proud of our volunteers who, through their efforts, are putting something back into society, working with our staff to make Cheltenham a better place, whilst also learning new skills and socialising with others.

Whether your interest in volunteering with us is in events, community projects, green space management or for another reason, we hope that you find it a rewarding experience.

The council adopted a vision that Cheltenham is a place where everyone thrives. Within our place vision we acknowledge the importance of volunteering, making an explicit statement that:

"*People and our communities thrive when there are more opportunities to volunteer, to give time and effort to making Cheltenham and its organisations and communities a better place.*"

This handbook provides you with all the information that you will need, outlines some of the benefits you will gain, and our expectations of you as a volunteer. You will receive more detailed information about the project that you will be working on, and your role in it, from your nominated supervisor who will be on hand to support you.

Thank you once more for offering to volunteer with us, we really do value our volunteers, many of whom have been with us for several years and who continue to champion the experience to others. If you are new to volunteering with us, we hope that you will feel the same.

We look forward to working with you.

CONTENTS

A VISION FOR CHELTENHAM

Cheltenham is an amazing place. From humble medieval origins to a buzzing borough of over118,000 people, Cheltenham is a place that has thrived through centuries of change. It is a place we are proud of and passionate about, and we are committed to helping it grow and prosper in years to come.

Within our place vision we acknowledge the importance of volunteering, making an explicit statement that

"*People and our communities thrive when there are more opportunities to volunteer, to give time and effort to making Cheltenham and its organisations and communities a better place.*"

Who volunteers for us?

There's no such thing as a typical Cheltenham Borough Council volunteer – volunteers like you join us for a variety of reasons and come from all walks of life.

Volunteers help us by:
- ➢ helping at events
- ➢ helping on community projects
- ➢ getting involved with environmental and outdoor activities
- ➢ and much more

For all of our volunteer roles we usually require a minimum age of 18 with the exception of 16-18 year olds who can join us for one-off events as long as they are accompanied by an adult.

The council will on occasion deliver specific schemes that work with young people or deliver projects or programmes that benefit young people. These activities all require their own safeguarding and health and safety risk assessments to be prepared and signed off in line with the council's policy framework to ensure that the young people's experience is a safe and positive one.

We do not place an upper age limit on volunteers because we recognise the valuable contribution made by all of our volunteers.

Your Volunteer Agreement

Arrangements with volunteers depend on trust and mutual understanding and are not intended to be legally binding. Volunteering is an exchange, and we hope that your volunteering experience with us will provide you with new skills, experiences and friendships. Acceptance of this handbook will be deemed to be acknowledgement of, and agreement with, the principles outlined below.

We will:
- ➢ provide you with a clear explanation of what you will be doing and why
- ➢ explain the standards we expect and encourage you to maintain them
- ➢ provide a named volunteer supervisor who will guide and support you in your role

- ➢ ensure that you are treated with respect and dignity
- ➢ provide a safe working environment
- ➢ provide an induction and any training to help you carry out your volunteering
- ➢ try and resolve fairly any problems and difficulties you may have while you volunteer with us
- ➢ welcome your feedback, good or bad, so that we can improve what we do
- ➢ reimburse you for actual and reasonable expenses incurred, in line with our volunteer policy
- ➢ keep you updated about volunteering opportunities and developments at the council
- ➢ recognise your contribution

In return we ask you to:

- ➢ complete the volunteer application form which includes signing the *Volunteers Declaration*:

  - ➢ *I understand that I am personally responsible for my own health, well-being and safety, and will only perform tasks I am fit to undertake*
  - ➢ *I accept that as a volunteer engaged in voluntary activities, I have a general duty of care towards members of the public, fellow volunteers and council staff*
  - ➢ *I agree to act with reasonable care and attention should I be required to use tools and equipment that are supplied Cheltenham Borough Council or supplied by myself*
  - ➢ *I understand that the activities I do as a volunteer will be agreed beforehand with the council staff member; and that I am only covered by the council's public liability insurance when I carry out these duties as directed.*

- ➢ respect our aims and values
- ➢ perform your volunteering role and project responsibilities as outlined in your volunteer agreement and role description to the best of your ability and to attend any training required
- ➢ treat others with respect, consideration and appreciation, no matter who they are and where they come from
- ➢ read and adhere to relevant policies and procedures, brought to your attention in your induction
- ➢ work professionally and safely, both for your own sake and others
- ➢ not commit the council to any expenditure other than reasonable travel expenses
- ➢ keep in touch with your volunteer supervisor, informing them if your circumstances or contact details change
- ➢ give reasonable notice if you are unable to attend so that we can make other arrangements
- ➢ provide regular feedback, including at the end of the project or your time with us

VOLUNTEERING WITH US

All volunteers will receive appropriate support and supervision in their activity. The level of supervision will match the nature of the role and the experience of the volunteer. All volunteers will have a nominated volunteer supervisor, someone they can have regular access to if problems arise or when help and support is needed, and we will provide you with their contact details.

It is important that you are well-briefed on the role you are to carry out. Your supervisor ultimately oversees your work and should give you sufficient guidance. We will provide you with a volunteer role description outlining the specific duties of the role.

What will my induction be like?

Your supervisor will help you get started and your induction will vary depending on your role, but a typical induction will include:
- ➢ a tour of the building or site
- ➢ an introduction to the team you will be working with
- ➢ health and safety advice
- ➢ practical guidance – you'll be shown where you'll sit and how to use any equipment necessary for your role.

Learning and development

We want you to be confident in your role so we'll provide you with any necessary learning and development opportunities, and the support you need to perform your role. If you are attending a single volunteering session, there will be an information briefing at the beginning of the session; longer-term roles will have a formal induction before duties begin. These will include general information about the council and information specific to the service in which you are volunteering, relevant health and safety instruction, guidance on good practice (for example advised dress) and a detailed discussion of the duties as listed in the volunteer role description.

Some roles will require further training such as shadowing council staff, carrying out duties with the support of staff or experienced volunteers, and learning skills via practical sessions. Refresher and extra training will also be provided as appropriate.

You may also be offered the opportunity to attend council courses, which are relevant to your volunteering role, free of charge.

If you feel that you need any specific training, please discuss this with your nominated volunteer supervisor.

Availability

How much time you give depends on your role, your project and your availability. Volunteering hours could involve mornings, afternoons, evenings or any days of the week. The role description will specify what constitutes a session within your role.

The role description will state the number of sessions you are expected to participate in and how long each session is. We ask that you make every effort to undertake these sessions.

Your volunteer supervisor will keep a record of the hours you volunteer. Depending on the role they may ask you to sign in and out of each session.

We recognise that as a volunteer you have offered your time freely, and as a result we will not enforce any obligations that would normally be found in an employment contract. We do not expect volunteers to attend, carry out certain tasks or commit a minimum amount of time, although we expect volunteers to help us planning our projects by making reliable arrangements of attendance with your volunteer supervisor. Likewise, we will not provide regular work or payment for any volunteer activity carried out.

We hope that volunteers will make every effort to attend and arrive on time but understand that unexpected events may on occasion prevent this from happening. If you are unable to attend on a certain day, please inform your supervisor as soon as possible so that alternative arrangements can be made.

THE ESSENTIALS

Expenses

We value the work carried out by our volunteers and the council is committed to paying *reasonable* 'out of pocket' expenses ensuring that potential volunteers are not excluded due to financial reasons. However, these need to be agreed in advance with your volunteer supervisor before you commence your volunteering activity. Where expenses are not agreed, you will be made aware of this at the first opportunity in the recruitment process.

We will not accept liability for any expenses that result from activities that have not been agreed in advance.

Breaks

You will be able to arrange suitable breaks with your supervisor. Please let them know if you have any specific needs or timings which need to be taken into account.

In line with current legislation, smoking, vaping and using e-cigarettes is not permitted within Cheltenham Borough Council buildings and vehicles. Designated smoking areas are available; please ask your volunteer supervisor for directions.

Equipment and Clothing

We will ensure that all volunteers have access to the necessary equipment to enable them to safely and effectively carry out the task in which they are engaged.

Any equipment or clothing provided by the council must be acquired via the volunteer supervisor and returned to them at the end of the task. You should safeguard any equipment provided by the Council and ensure that it is kept in effective working condition.

Use of IT equipment

If your volunteering role requires access to our IT network and systems, we will ensure that you receive appropriate training to enable you to carry out your role and responsibilities. This will include an element of data security training. Normally we will not provide you with a Cheltenham Borough Council email account.

WHAT COUNCIL POLICIES WILL I NEED TO FOLLOW?

As a volunteer with the council we will expect you to follow all of our policies and codes of practice. Your volunteer supervisor will be able to give you more details on these during your induction but the main policies which you need to know about are:

Volunteer Policy

This emphasises the value we attach to volunteering and our relationship with our volunteers. It outlines how and why we involve volunteers including how we recruit, select and manage our volunteers, and our principles of best practice.

Health & Safety

We are committed to ensuring the health, safety and welfare of our volunteers. We want to make sure that you are aware of and understand the health and safety risks associated with your role. We will provide you with the appropriate information, instruction, supervision and training required to enable you to work safely while volunteering at the council.

What does this actually mean for me?

As a volunteer you must:
  ➢ take reasonable care of yourself and others
  ➢ follow the health and safety policy and procedures of the council
  ➢ cooperate fully with your supervisor
  ➢ report on any health and safety concerns you may have
  ➢ report any accidents/incidents you have while at the location of your volunteering role

Risk assessments

As with our council employees, we carry out detailed risk assessments for each volunteer role in order to identify and address any potential hazards. These risk assessments are in line with current health and safety legislation.

Managing risks

If you have a disability or medical condition, you should disclose this in your application form and to your volunteer supervisor. This will help us to better ensure your health and safety at work and allow us to consider any reasonable adjustments, such as equipment or support, which you may need to fulfil your role to the best of your ability.

Emergencies

All volunteers are required, on application, to provide the council with a partner, family member or close friend's contact details in case of an emergency.

Insurance

All volunteers who are individually registered with and managed by the council to work in connection with council business are automatically covered by the council's insurance policies.

The council's insurance policies include coverage for Public Liability exposures, which covers any damage or injuries to members of the public or their property caused by the negligent actions of our volunteers whilst under supervision of the council. The policies will also protect the volunteers under the council's Employers Liability coverage, should they suffer an injury in the course of their duties and where the council are found to have acted negligently.

Please note that constituted groups who register to volunteer as a group, or businesses, local organisations and educational establishments wishing to provide volunteers for a one-off event need to have their own public liability insurance.

We ask all of our volunteers not to bring valuable items to their volunteering site. If you do, please be aware that you do so at your own risk.

Confidentiality and data protection

As a volunteer you may become aware of confidential information about Cheltenham Borough Council, its staff, users and suppliers. You must not disclose this information or use it for your own (or another's) benefit without the consent of the party concerned. This does not prevent disclosure once the information is in the public domain.

Likewise, we will ensure that any personal information you supply us with is treated in confidence and is handled in accordance with data protection regulations. Information you provide will only be used by Cheltenham Borough Council to provide you with the opportunity to volunteer in line with the volunteer privacy statement. Any health or emergency contact information is only

collected to support you whilst volunteering or in case of emergency. Please inform us of any changes in your personal details so that we can keep our records up to date.

Safeguarding

Safeguarding is a process of protecting children, young people and vulnerable adults from abuse, neglect or harm. All volunteers who come into contact with vulnerable groups have a duty of care to safeguard, protect and promote their welfare.

Should your volunteering role involve contact with vulnerable groups, you will receive training on safeguarding and child protection.

During your time as a council volunteer, whatever your role, should you become aware of any safeguarding issues you **must** disclose them to your volunteer supervisor immediately.

More information about the council's approach to safeguarding, can be found here

Disclosure and Barring Service (DBS) checks

DBS is short for the Disclosure and Barring Service, an organisation which checks for any crimes a person may have committed and any times when they have been involved with the police. Your volunteer role may require you to be DBS checked – if this is the case, we will ask you to complete a form and provide various items of identification. Successful checks are usually confirmed within a month, although this occasionally takes longer.

If at any time during your span as a volunteer you are notified or become aware that you may be subject to new police proceedings, or that you have been referred to the DBS, you **must** inform your volunteer supervisor as soon as possible. This circumstance does not automatically mean you can no longer volunteer, but the continuation of your role would have to be considered.

Equality and diversity

The council is committed to the elimination of discrimination and promotion of equality of opportunity for all citizens and will work towards this goal, both in the provision of services and employment. We will do everything reasonably practical to make volunteering available to everybody and to conform to all relevant legislation. We want to create a good and harmonious working environment in which you should not feel threatened or intimidated.

For further information on our equality policies, please follow the link here.

OTHER THINGS YOU SHOULD KNOW

When there is a problem

We aim to make your volunteering enjoyable and worthwhile but occasionally problems do occur. As volunteers are not employees, they are unable to use the council's grievance policy and procedure. However, they are entitled to use the council's complaints procedure.

Complaints by volunteers should be raised in the first instance with their supervisor and dealt with informally where possible. Where appropriate, the complaint will be investigated fully by their supervisor, or if the complaint is against their own supervisor, by another volunteer supervisor or their line manager.

If we have concerns about your behaviour or contribution as a volunteer, we will discuss them with you and agree steps to address the concerns. These may include additional training or mentoring. However, if these areas of concern cannot be resolved after additional formal discussions, your volunteering relationship with us may have to end. In all cases you will be entitled to an explanation of the decision and action taken.

Volunteering whilst receiving benefits

Volunteering can often improve your job prospects by providing useful work experience and training. You can continue to claim benefits, as long as the only money you receive is to cover your volunteering expenses.

If you are unemployed and claiming benefits you should tell your benefits adviser that you intend to volunteer before starting. It is your own responsibility to establish whether volunteering is going to affect your entitlement to any benefits. Further advice should be obtained from the Department of Work and Pensions (DWP), Job Centre Plus, or Citizens Advice as Cheltenham Borough Council cannot be held responsible for any losses you may have.

Moving on

You can stop volunteering whenever you wish, although we will of course be sorry to lose you! Please give us as much notice as you can, so that we can make alternative arrangements and ensure that the project is not delayed.

At the end of your time as a volunteer, it would be helpful if you would take the time to provide us with some feedback – this will help us improve future volunteer projects. We will ask you to complete a feedback form to gather your opinions on your time as a whole, which will help us identify what has worked well and not so well. This feedback will be used to help shape future projects and ensure that they are successful. Your volunteer supervisor will talk you through the final arrangements.

If your volunteer placement is coming to an end and you would like to keep volunteering with us, please speak to your supervisor. We are keen to help our volunteers develop new skills and experience and may be able to identify another project that may be suitable for you.

References

If you require an academic, professional or character reference, your volunteer supervisor will be able to provide you with one. This could detail the training you have received and any skills you have acquired or updated.

Contact Details

We hope you will enjoy your time with us and if you have any issues or concerns, please speak to your supervisor who is always your first point of contact. However, if you have any questions about your application, forms you need to complete or other documents, or if you would like to talk to someone in the volunteering team, please contact the volunteering team:

volunteering@cheltenham.gov.uk
01242 264376

Volunteering Team, Communities, wellbeing & partnerships
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA.

News and Events

As one of our volunteers, it's important we keep in touch with you. We have various ways of letting you know what's going on in the council, in your region and in your community.

➢ **Our website**
You can go online at cheltenham.gov.uk to find out more about what we do.

➢ **Social media**
See what's happening in the borough or post a message to join the conversation.
Cheltbc   @cheltenhamBC

➢ **Paid employment**
Paid roles are advertised on the CBC website

Thank you!

Thank you for taking the time to read this handbook. Whilst it is fairly lengthy it attempts to answer most of the questions our volunteers have. The volunteering team is here to facilitate your activity with the council, so please contact us if you have any queries.

Finally, a huge thank you to all our volunteers; your willingness and enthusiasm to support your local town really is greatly appreciated.

Whilst relevant to all council services, the information in this handbook is not intended to be comprehensive; individual services may occasionally differ in their requirements and implementation. Any such deviations will be covered by the service in the role description or in your training

Cheltenham Borough Council

Cabinet – 18 February 2025

Land at Pittville Park – Dedication Agreement

Accountable member:

Alisha Lewis, Cabinet Member for Assets and Finance

Accountable officer:

Gemma Bell – Director of Assets & Finance, Deputy S151 Officer

Ward(s) affected:

Pittville

Key Decision: No

Executive summary:

To enter into a Deed of Dedication with Gloucestershire County Council, covering an area of public open space at Pittville Park for the purposes of facilitating the A435 Cheltenham to Bishops Cleeve cycleway

Recommendation: That Cabinet:

- **agrees to enter into the Deed of Dedication which contributes to the Council's fundamental priorities of the Corporate Plan and Net Zero ambitions.**

---

1. Implications

1.1 Financial, Property and Asset implications

The deed of dedication involves allowing GCC to build the cycleway on a strip of land (as detailed) in an area that forms part of the council's open space. CBC will retain ownership, but maintenance obligations will be met by GCC.

All capital costs and maintenance costs will be covered by GCC under the agreement and therefore has no impact on CBC capital or revenue budgets.

Signed off by: Andy Taylor, Principal Commercial Accountant, andy.taylor@cheltenham.gov.uk

1.2 Legal implications

The proposed dedication area forms part of the Council's Open Space. Any decision to grant an appropriation thereof must first be advertised for 2 weeks as such, pursuant to s123(2)(a) of the Local Government Act 1972 in the Public Notices section of a local newspaper. All comments and representations received are to be considered and addressed before a final decision is made.

Further to the, the proposed dedication is for a period of longer than 7 years, and for nil rent which is therefore less than 'best consideration'. Under s123, the Council has an obligation to secure best consideration reasonably obtainable when disposing of public open space for a period of 7 years or more. This obligation can be waived with the consent of the Secretary of State, who has given a General Consent to such transactions where, in the reasonable opinion of the Council, the disposal is for:

- The promotion of improvement of economic well-being

- The promotion or improvement of social well-being

- The promotion or improvement of environmental wellbeing.

The Council will be relying on such Consent for the Dedication Agreement.

Signed off by: One Legal legalservices@onelegal.co.uk

1.3 Environmental and climate change implications

The development of this section of cycleway will lead to positive associated environmental implications when in use, such as reduced greenhouse gas emissions and increased sustainable transport options. This enables residents to transition to net zero options for travel, therefore supporting the Net Zero by 2030 goal within the borough. As this report relates directly to the Deed of Dedication, instead of the installation of the cycleway and overall project proposal, it is requested that the GCC project lead completes that attached climate impact assessment tool. This will demonstrate the construction phase implications, and provide an accessible format for members to review the potential trade-offs and planned areas of mitigation.

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Working with residents, communities and businesses to help make Cheltenham #netzero by 2030
- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

See Appendix 2.

---

2 Background

2.1 As part of the implementation of the A435 Cycleway, GCC will be undertaking works at some locations on CBC land at Pittville Park. These locations are as shown in red on the plan below:

2.2
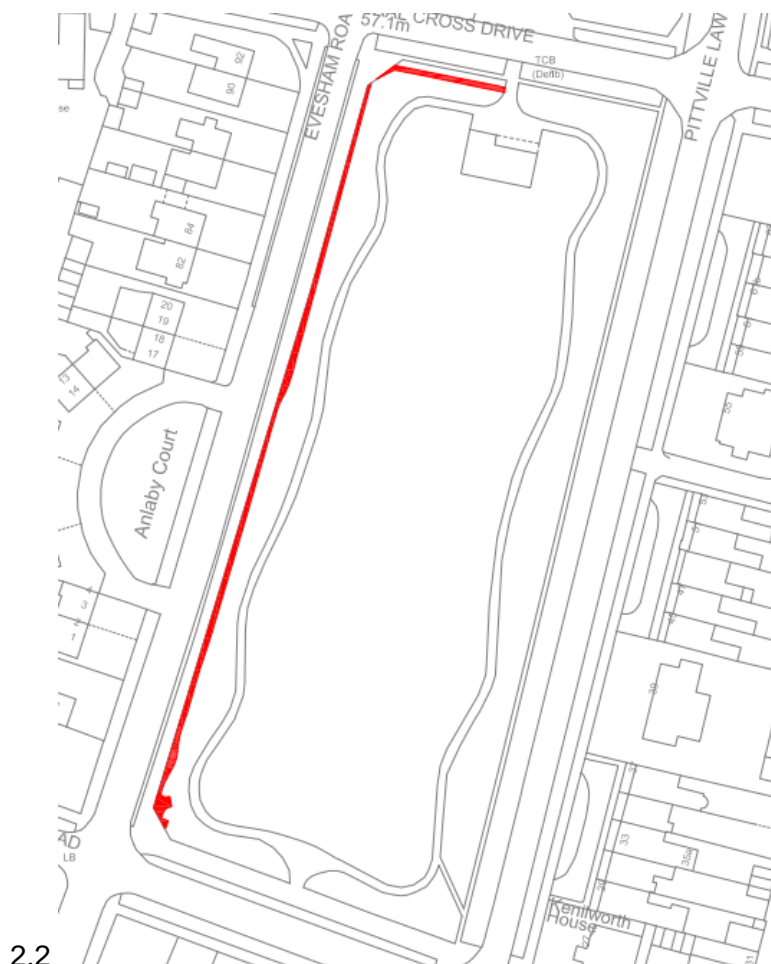
2.3 On completion of the works, the land utilised will form part of the in-use cycleway.

2.4 The Dedication Agreement will transfer maintenance responsibility and use of the land to Gloucestershire County Council however this will be an appropriation only, CBC will retain the Freehold.

2.5 Due to the current designation of the land as Public Open Space, the Council has advertised the appropriation pursuant to s123 of the Local Government Act 1972 and any objections to the proposal are to be considered by Cabinet

2.6 Notices were published 5th and 12th December and no representations were received in response.

2.7 An inspection of the deed has also been undertaken which confirms that there is nothing on the title that would prevent the land from being used for the purpose of a cycle track.

2.8 The proposed use is not unfitting with the uses generally associated with a public park and the works will improve facilities for pedestrians, cyclists, residents and park users.

2.9 Works to this are of the cycleway commenced under Licence on 6th January 2025.

2.10   GCC have been provided with a letter of comfort that it is the full intention of CBC to enter into a Deed of Dedication on completion of the works for the purposes outlined in this report subject to:

- The Council advertising and being able to satisfactorily deal with representations (if any) received in response to the s123 notices

  And

- Cabinet Approval

3   Reasons for recommendations

3.1 The recommendation is to enter into the Deed of Dedication with Gloucestershire County Council as it contributes to the Council's fundamental priorities of the Corporate Plan and Net Zero ambitions by:

- Enhancing and protecting our environment – using a Council asset effectively for the benefit of the community.

- Strengthening our communities – the Council would be working in consultation with the community, community groups and the voluntary sector

Page 175

3.2 By entering into the Dedication Agreement, the Council demonstrates recognition that cycling and an active lifestyle make a major contribution in society in policy areas such as health, education, quality of life and addressing social inclusion.

3.3 Since the Pandemic, there has been an increase in value (social) for amenity space. Regeneration, refurbishment and improvements of these facilities are in the wider interest of the community.

3.4 The cost of maintenance will be transferred to the County.

4 Alternative options considered

4.1 The Council could decline the request for the Deed of Dedication however by doing so, the investment for the improvements would be lost. There is not sufficient capacity in current budgets or resources for works of this size and scale.

4.2 The Council also considered not proceeding with the project however this was rejected due to the fact that the project contributes to the fundamental priorities of the Corporate Plan and Net Zero ambitions.

5 Consultation and feedback

5.1 GCC have undertaken consultation with local groups who frequently use the park, ward councillors, local residents, Gloucestershire Constabulary's Designing Out Crime officer and CBC officers.

5.2 The feedback has informed the design of the improvements and is overwhelmingly supportive of the proposals.

5.3 The proposals were further examined by the Council's Asset Management Working Group who were supportive of the recommendation.

6 Key risks

6.1 That GCC do not complete the works as planned to result in CBC being left with responsibility for them.

6.2 To mitigate this, the Deed of Dedication will contain sufficient covenants to prevent CBC being left with any liability.

6.3 A breach of covenant will result in the usual remedies in law; either, a permanent injunction or the seeking of damages.

Report author:

Claire Pockett, Surveyor, claire.pockett@cheltenham.gov.uk

Appendices:

    i.   Risk Assessment
    ii.   Equality Impact Assessment – Screening

Background information:

N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1.	That GCC do not complete the works as planned to result in CBC being left with liability for them	Director of Finance & Assets	3	2	6	Accept the risk	The Deed of Dedication will contain sufficient covenants to prevent CBC being left with the liability. Usual remedies in law will apply: injunction or damages.	Director of Finance and Assets	Ongoing.

Appendix 2:   Equality Impact Assessment

---

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Claire Pockett	Service Area: Assets & Finance
Title: Surveyor	Date of assessment: 6th Feb 2025
Signature: Claire Pockett	

b. Is this a policy, function, strategy, service change or project?

Project

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Pittville Park – Deed of Dedication

Is this new or existing?	**Other**

Please specify reason for change or development of policy, function, strategy, service change or project

To regularise the use of the part of the park as part of the A435 cycleway scheme

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To enter into a Deed of Dedication with Gloucestershire County Council for the appropriation of the land as part of the cycleway scheme.
Objectives:	To regularise the legal use and responsibility of the land and ensure that obligations for maintenance are sufficiently provisioned for.
Outcomes:	For all parties to the Deed to be aware and bound by the terms. To ensure the investment in the project is protected. To clearly identify use as part of the A435 cycleway.

Benefits:	Contribution to the Council's corporate priorities and net zer ambitions.

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**
Please provide an explanation for your answer:	
By entering into the deed of dedication, CBC are recognising the positive contribution that cycling makes to the health and well-being of the community. It is further benefitting and enhancing a community asset.	

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

f. Identify next steps as appropriate

Stage Two required	**No**

This page is intentionally left blank

Cheltenham Borough Council

Cabinet – 18 February 2025

Corporate Risk Register

Accountable member:

Rowena Hay, Leader

Accountable officer:

Gareth Edmundson, Chief Executive

Ward(s) affected:

N/A

Key Decision: No

Executive summary:

- This report provides a copy of the council's Corporate Risk Register detailing strategic risks.
- The Corporate Risk Register summarises the council's corporate risk profile as at the 31 December 2024.
- The register includes detailed strategic housing risks.
- The register has been prepared in consultation with Risk Managers and the Senior Leadership Team.
- The register details risk movements since the last formal report enabling Members to track CBC risk profile.

Recommendation: That Cabinet:

- **notes the Corporate Risk Register.**

---

1. Implications

1.1 Financial, Property and Asset implications

Poor risk management can lead to increased financial costs therefore it is important to have robust processes in place.

Signed off by: gemma.bell@cheltenham.gov.uk.

1.2 Legal implications

There are no specific legal implications arising from the report and its recommendations. It is fundamental that the Council has an embedded risk management framework which considers the identification, recording, and management of risks to the Council in the delivery of its priorities and objectives.

Signed off by: One Legal

1.3 Environmental and climate change implications

Leveraging the requirement to complete Climate Impact Assessment to support decision making, alongside a Risk Management programme specifically for climate and flood risks, an effective risk management framework across projects, programmes and business activities will ensure that climate implications are considered, relevant risks highlighted, and mitigations controls put in place.

Signed off by: maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to all Corporate Plan Priorities as effective risk management is essential to the achievement of CBC plan.

Signed off by: ann.wolstencroft@cheltenham.gov.uk

1.5 Equality, Diversity and Inclusion Implications

Good risk management across all aspects of our business should ensure Equality, Diversity and Inclusion implications are considered and any risks are highlighted, and controls put in place to mitigate.

---

2 Background

2.1 Risk management is the culture, process and structures that are directed towards effective management of potential opportunities and threats to the Council achieving its priorities and objectives.

2.2 The Council has a Risk Management Policy, reviewed in October 2024, that sets out the approach to risk management including the roles and responsibilities for Officers and elected Members. The policy also details the processes in place to manage risks at corporate, operational and project levels.

2.3 The Council's Leadership Team considers and reviews strategic risks on a monthly basis and the register is made available to Cabinet. All reports to Council / Cabinet / Committees contain risk implications. All risk discussions / assessments include the development of risk mitigation actions designed to reduce the likelihood and / or consequences of adverse events occurring. By understanding and managing risks, the council can be more confident about undertaking ventures which produce larger gains.

2.4 This corporate risk report is provided to Audit, Compliance and Governance Committee detailing strategic council risks. This report covers strategic risks as well as a narrative outlining changes to risks and scores since the last formal report. This allows the committee to track movements in our risk profile.

2.5 The risk register covers:

- Risk status.
- Risk details.
- Risk manager.
- Current risk score (impact & probability).
- Change from last assessment.
- Risk action.
- Details of any controls in place to mitigate the risk.
- Risk review date.

2.6 It is important to note that key projects / programmes will each have an individual risk register containing many risks. To keep track of these from a corporate perspective we have for each of these projects and programmes only one risk on the corporate risk register. For example, the Golden Valley development has a full risk register presented to Programme Board but one risk on the corporate risk register. The score of the risk on the corporate register will always reflect the highest score from the GV risk register. This enables us to monitor the highest risks we have across the organisation.

2.7 Whilst the register in appendix 1 contains a full list of our corporate risks, the top four risks are highlighted for this report. At the present time our top 4 risks are:

- Medium Term Financial Strategy - If CBC is unable to come up with long term solutions which bridge the gap in the medium-term financial strategy, then it will find it increasingly difficult to prepare revenue budgets year on year without making unplanned cuts in service provision.

- Prioritisation of Capital Resources – If CBC are unable to prioritise medium term projects and programmes which require significant capital financing, then it will increasingly have to rely of borrowing to fund service investments increasing the pressure on our revenue budgets to fund repayments.

- Golden Valley Development - If the development does not achieve the anticipated investment return to CBC then the project objectives will not be met. (The anticipated investment return to CBC is set out in the Financial Model & draft Business Case in the Development Agreement.)

- Leisure & Culture Venues - If the council does not have a long term vision & investment plan in place for its leisure & culture venues then significant unplanned maintenance, repairs & investment may be required to keep the venues running & it may undermine the ability of Since the last report there have been some movements in our strategic risks and these changes are shown on the register.

2.8 Since the last report eight new corporate risks have been added to our register and are:

- Local Government Reorganisation – If local government re-organisation is not managed effectively then it will impact services to residents and businesses. It may also impact staff recruitment, motivation and retention.

- Big Local – If the Petersfield Management Group do not provide Big Local with the required information within the required timescales then there is the possibility they will withdraw their grant funding.

- Environment Agency regulation changes relating to the HRC – If CBC do not invest an estimated £1million in upgrading the existing infrastructure the current site cannot continue to operate in the medium term because it will not be compliant with new EA permitting requirements.

- Recycling – If Extended Producer Responsibility (EPR) payments do not adequately cover the current income streams and costs for CBC then there may be a negative impact on the MTFS which would worsen if GCC recycling credit payments reduce or cease for out of scope EPR materials.

- Waste Collection - If Waste Collection Authorities such as CBC are responsible for payment of some of the new emissions tax due 2028 (ETS) for refuse disposed of at Javelin Park EFW then this will have a negative financial impact on the MTFS.

- Corporate Resource – If there is insufficient progress on the development of a new strategic waste depot site then this may impact the resilience of

waste collection and may result in additional costs to the council.

- Void Properties - If the management of void properties does not improve then this will lead to increased costs associated with additional use of temporary accommodation, reduced rent collection and failure to comply with the statutory timescales in relation to the use of temporary accommodation.

- Devolution – If the devolution of powers from government and the creation of strategic authorities is not managed effectively then there is the potential of disruption to certain services.

2.9   Since the last report 1 corporate risk has been removed and this is Marketing Cheltenham as it is now being managed as an operational risk.

2.10   Report to note only.

3   Alternative options considered

3.1 None

4   Consultation and feedback

4.1 Risk Managers and Leadership Team.

5   Key risks

5.1 None.

Report author:

Ann Wolstencroft, Head of Corporate Services

Appendices:
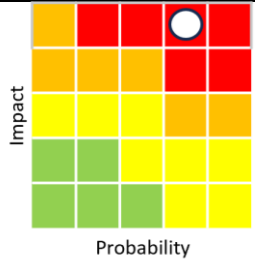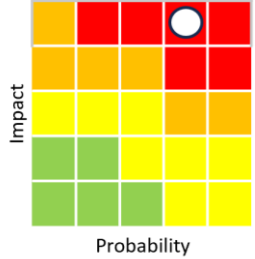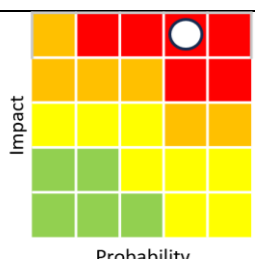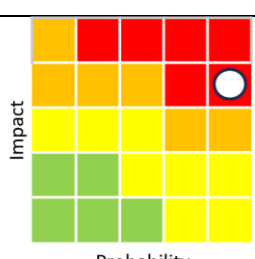
i.   Risk Register
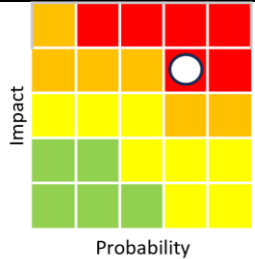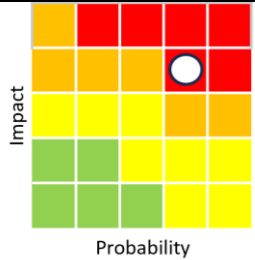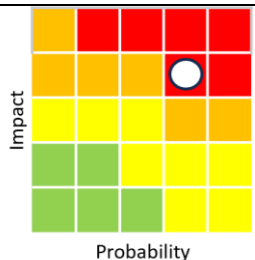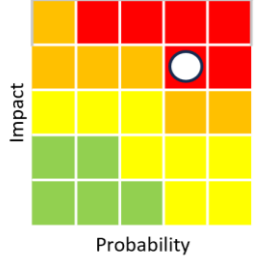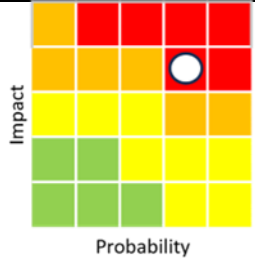
Background information:
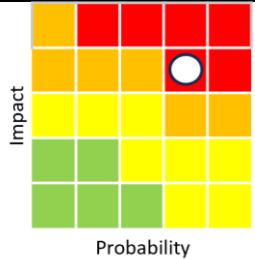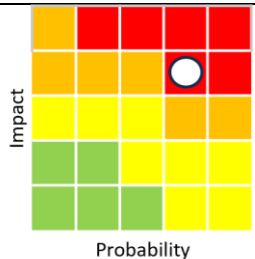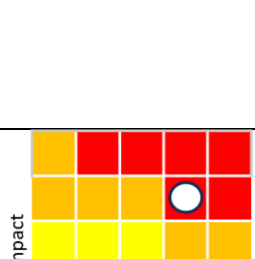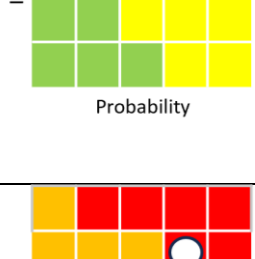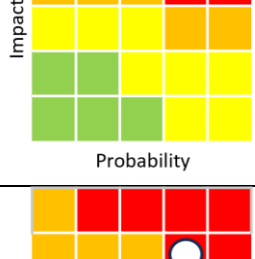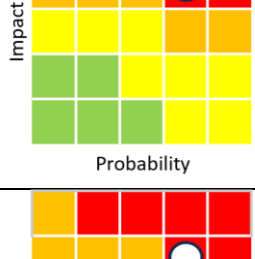
N/A
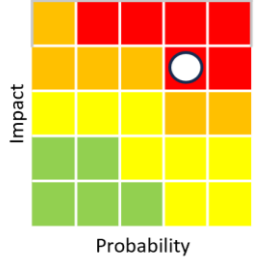
This page is intentionally left blank
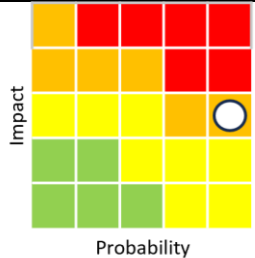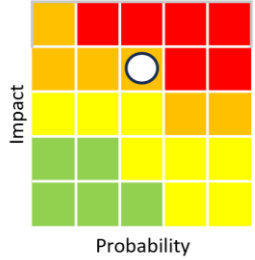
Cheltenham Borough Council - Corporate Risk Register – 31 December 2024

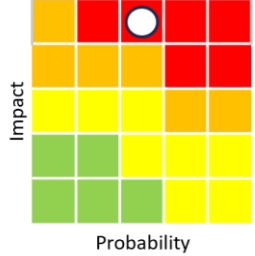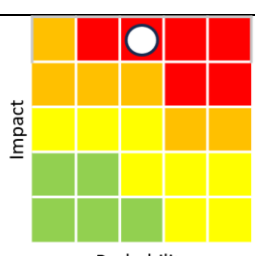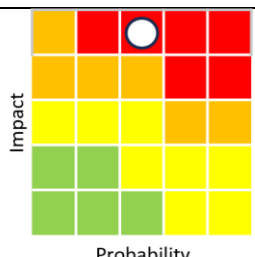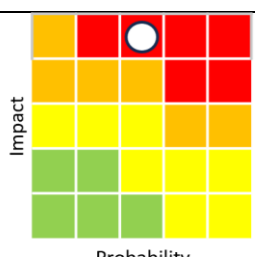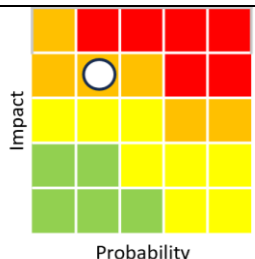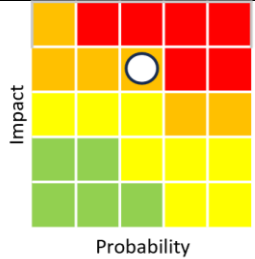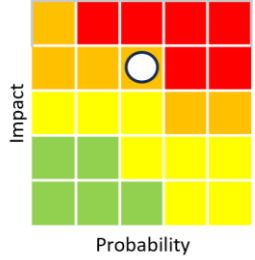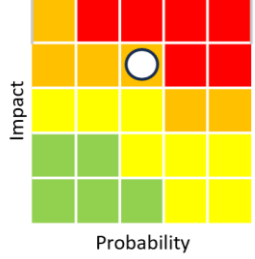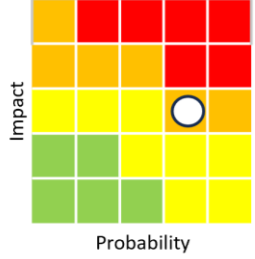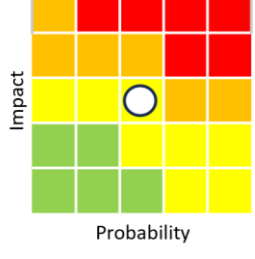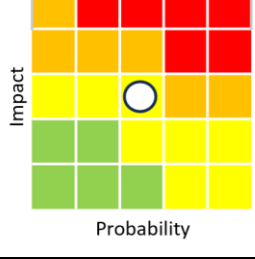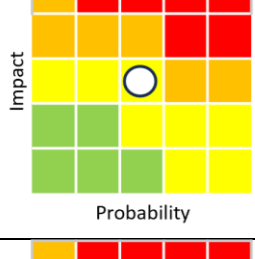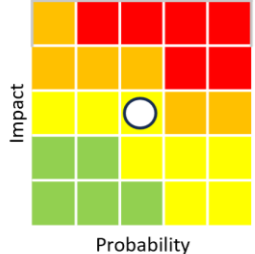| Ref	Status	Risk Details	Risk Manager	Current Assessment	Change from Last Assessment	Risk Action	Current Control Details	Review Date
52		Medium Term Financial Strategy - If CBC is unable to come up with long term solutions which bridge the gap in the medium-term financial strategy, then it will find it increasingly difficult to prepare revenue budgets year on year without making unplanned cuts in service provision.	Paul Jones Gemma Bell	Impact - 5 Probability - 4 Score - 20	No change. Risk reworded to reflect new capital risk below.	Reduce	- Commercial strategy & activities - Quarterly budget monitoring - Cabinet engagement - budget proposals - Increased capacity in the finance team - Cabinet Away Day challenge and decisions - Ongoing monitoring of targets for workstreams/services	31/03/2025
403		Prioritisation of capital resources – If CBC are unable to prioritise medium term projects and programmes which require significant capital financing, then it will increasingly have to rely of borrowing to fund service investments increasing the pressure on our revenue budgets to fund repayments.	Gemma Bell	Impact - 5 Probability - 4 Score - 20	No change.	Reduce	- Ongoing review and alignment of the capital programme with the Corporate Plan - Quarterly budget monitoring - Cabinet engagement - budget proposals - Gateway reviews of all projects through the Corporate Programme office - Cabinet Away Day challenge and decisions - - Business case and approval for all new projects, including allocation of resource and budgets	31/03/2025
149		Golden Valley Development - If the development does not achieve the anticipated investment return to CBC then the project objectives will not be met. (The anticipated investment return to CBC is set out in the Financial Model & draft Business Case in the Development Agreement.)	Paul Minnis	Impact - 5 Probability - 4 Score - 20	No change however it should be noted that that specific risks of onerous GCC highway and transportation requirements, other S106 contributions, site wide utility costs and sustainability measures may impact on the overall scheme viability through to the Financial Model and Business Case in the Development Agreement.	Reduce	- Ongoing gate reviews at key decision points - Underwrite budget subject to close monitoring by the Head of Development - Appointment of internal construction expertise - Working with key partners including LPA and Natural England - Close scrutiny of full project risk register by Project Board	31/03/2025
385		Leisure & Culture Venues - If the council does not have a long term vision & investment plan in place for its leisure & culture venues then significant unplanned maintenance, repairs & investment may be required to keep the venues running & it may undermine the ability of the Trust (or any future provider) to run leisure & culture services in a profitable way.	Richard Gibson	Impact - 4 Probability - 5 Score - 20	Increase in probability due to increasing maintenance issues and closures.	Reduce	- Detailed maintenance plan to be developed - Project to review and appraise venues and identify investment required. - Phase 2 sports strategy	31/01/2025
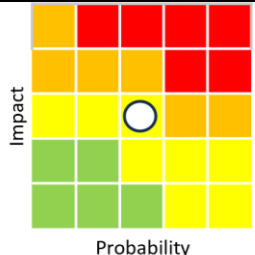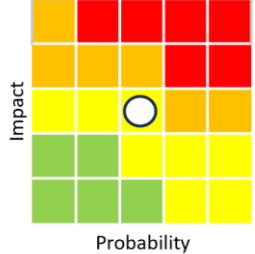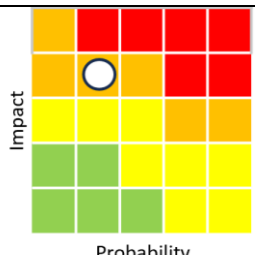
360	Impact / Probability	Cost of Living Crisis - If the cost of living crisis continues with energy, interest & other costs driving up inflation then it will impact on the councils financial stability & our ability to deliver services & major developments as well as having a negative impact on our customers & staff.	Gareth Edmundson	Impact - 4 Probability - 4 Score - 16	No change	Reduce	- Ensure sign posting in place for support - Availability of community grants for funding - Continual reviews on energy costs	31/3/2025
CH2	Impact / Probability	Property Compliance - If there is ineffective management of property compliance then this will result in regulator intervention and reputational damage.	Paul Jones	Impact - 4 Probability - 4 Score - 16	No change	Reduce	- Effective oversight of property compliance performance by senior officers, Cabinet and Housing cabinet committee. - Robust delivery model for each of the big 6 property compliance areas + damp, mould, and condensation. - Ensure delivery meets property compliance policy. - Development of systems to evidence delivery through consistent data and record keeping. - Assurance processes to ensure delivery meets legal requirements.	28/2/2025
397	Impact / Probability	Publica Information Technology (IT) - If the Councils do not effectively manage the changes to Publica then we may lose valuable IT Staff putting the councils IT systems at risk.	Gareth Edmundson	Impact - 4 Probability - 4 Score - 16	No Change.	Reduce	- Ongoing discussions with Shareholders - Discussions with other Publica CEO's - Publica appointed interim Programme Director	31/3/2025
342	Impact / Probability	Impact of lack of 5 Year housing land supply - If, based upon current evidence Cheltenham does not have a 5 year housing land supply then an action plan needs to be put in place to address this.	John Spurling	Impact - 4 Probability - 4 Score - 16	No Change.	Reduce	- Undertaking site visits as well as contacting the development industry where appropriate. - New NPPF published with new standard method and the publication of the Housing delivery test results. - Our published 5 year housing land supply position statement as at 31 March 2024 shows that the authority could demonstrate a 4.57 years' supply of housing land against the existing standard method. However, this is now updated to 2.52 years. Therefore, not only does the presumption in favour of sustainable development apply, but also we need to add a 20% buffer to our housing requirement as required by the NPPF. An action plan needs to be put in place to address this risk.	31/03/2025
296	Impact / Probability	Cheltenham Trust - If the Trust is unable to deliver on its five year business plan & run leisure & culture services in a profitable way (within context of cost of living crisis) then the council may incur financial costs to ensure the organisation remains solvent.	Richard Gibson	Impact - 4 Probability - 4 Score - 16	No change.	Reduce	- Independent Financial Review - Regular governance meetings - Contract management - Management of the collection - Monitoring the impact of the reopening of the Wilson - Leisure @ Options appraisal	31/3/2025
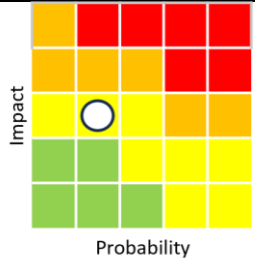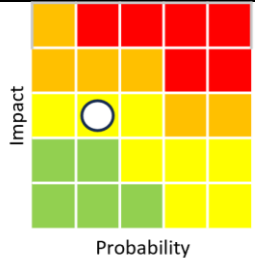
No.	Risk Matrix	Risk Description	Owner	Score	Direction	Treatment	Controls	Date
357		High Street Defects - If the defects to the High Street are not resolved by external companies, then CBC may have to rectify at their own cost.	Claire Hughes	Impact - 4 Probability - 4 Score - 16	No change.	Reduce	- Kings Counsel and experts engaged - Cost Plan & insurance in place - Disclosure completed - Witness statements being prepared - Trial date has been agreed for June 2025	31/01/2025
342		Cheltenham, Gloucester & Tewkesbury Strategic & Local Plan - If there is a failure to gain political consensus across the partners to reach key milestones & failure to adequately resource work then this would impact on reaching milestones which would lead to delay, costs, lack of delivering statutory part of development plan & potential special measures.	John Spurling	Impact - 4 Probability - 4 Score - 16	No change.	Reduce	- SLP Secretariat - Joint Advisory Group - Strategic and Local Plan Task Group & Strategic and Local Plan Steering Group - Planning & Liaison Member Working Group - Full risk review regularly updated and available within SLP programme files. - Strategic and Local Plan Programme Management	31/03/2025
127		Carbon Neutral - If we fail to make Cheltenham carbon neutral by 2030 then we will not achieve our corporate objectives.	Frances Crick	Impact - 4 Probability - 4 Score - 16	No change.	Reduce	- Employ a climate manager - Climate change funding - Climate change county level co-ordination - Create net zero partnerships - Secure adequate tools & resources to enable the delivery of the Climate Emergency Action Plan - - Climate pathway reviewed and new action plan in place.	28/2/2025
110		Cyber Security - If CBC have a cyber security breach then this could impact the Council's ability to deliver services leading to resident hardship, financial loss & reputational damage.	Ann Wolstencroft	Impact - 4 Probability - 4 Score - 16	No change.	Reduce	- Cyber security controls (Publica ICT) - Cyber Attack - business continuity planning - Cyber Training for staff & members - Learning from others	31/3/2025
408		Local Government Reorganisation – If local government re-organisation is not managed effectively then it will impact services to residents and businesses. It may also impact staff recruitment, motivation & retention.	Gareth Edmundson	Impact – 4 Probability – 4 Score - 16	New Strategic Risk	Reduce	- Countywide discussions with all Gloucestershire authorities. - Establishing effective partnership governance. - Timely decision making. - Engagement with government. - Ongoing communication with staff.	28/02/2025
409		Big Local – If the Petersfield Management Group do not provide Big Local with the required information within the required timescales then there is the possibility they will withdraw their grant funding.	Claire Hughes	Impact – 4 Probability – 4 Score - 16	New Strategic Risk	Accept	- Responsibility of Petersfield Management Group to deliver required information within the required timescales	28/02/2025

	Risk		Owner	Score	Direction		Response	Controls	Date
CH3		Stock Condition Data - If there is a failure to maintain accurate, in date stock condition data then this means we are unable to plan spend, evidence investment, demonstrate accurate decent homes data and provide assurance that tenant's homes are safe.	Paul Jones	Impact - 4 Probability - 4 Score - 16		Probability reduced due to controls now in place.	Reduce	- Effective oversight of property compliance performance by senior officers, Cabinet and Housing cabinet committee. - Maintaining up to date stock condition data. - Using data to prioritise property investment and address decency / H&S issues. - Effective use of resources.	28/02/2025
CH4		Housing Properties Health & Safety - If we do not manage health and safety management of our housing properties, then we may be putting tenant at risk of serious injury or death.	Paul Jones	Impact - 5 Probability - 3 Score - 15		No change.	Reduce	- Clear health & safety procedures in place with evidence these are followed. - Regular independent assurance that health and safety is being management effectively. - Effective oversight of health and safety performance by senior officers, Cabinet and Housing cabinet committee.	28/3/2025
53		Budget Deficit Reserve - If the Budget Deficit (Support) Reserve is not suitably resourced, insufficient reserves will be available to cover anticipated future deficits, resulting in the use of General Balances, which will consequently fall below the minimum required level as recommended by the Section 151 Officer in the Council's Medium Term Financial Strategy.	Gemma Bell	Impact - 5 Probability - 3 Score - 15		No change.	Reduce	- Ongoing Reviews - Strengthen Reserves	31/03/2025
347		Energy Costs (Gas & Electric) - If energy costs keep rising / fluctuating as per the current market then it impacts on our ability to accurately budget/forecast expenditure & may impact on the investments we can make in projects / programmes whilst still being able to achieve our MTFS.	Gemma Bell	Impact - 5 Probability - 3 Score - 15		No change.	Reduce	- Provide awareness training for staff to highlight their role at an individual level - Ensure responsibilities for energy management are clearly defined and allocated within each operational asset - -Reduce operational energy demand through investment in renewables and improved insulation, together with heating and lighting controls with external gatekeeping processes	31/03/2025
CH6		Housing Regulatory & Legal Requirements - If we fail to meet regulatory and legal requirements, specifically the Regulator for Social Housing consumer standards and the Housing Ombudsman Complaints Handling Code then this may result in intervention and reputational damage.	Claire Hughes	Impact - 5 Probability - 3 Score - 15		Probability reduced due to mitigations now in place and response from Regulator	Reduce	- Self-referral made to regulator – no regulatory judgment issued. - Effective oversight of regulatory performance by senior officers, Cabinet and Housing cabinet committee. - Delivery of Consumer Standard Improvement Plan - External expertise in place to support compliance with the standards including mock inspection. - Annual self-assessment of compliance with the Complaints Handling Code (published to tenants and HO.	31/01/2025

ID	Risk Matrix	Risk Description	Owner	Score	Direction / Change	Response	Mitigations	Date
405		Environment Agency regulation changes relating to the HRC – If CBC do not invest an estimated £1million in upgrading the existing infrastructure the current site cannot continue to operate in the medium term because it will not be compliant with new EA permitting requirements.	Karen Watson	Impact - 3 Probability - 5 Score – 15	New Strategic Risk	Reduce	- Mitigate permitting requirements by spending £1million approx. on infrastructure requirements OR a prolonged closure of the site to remain compliant and realise a financial saving	28/02/2025
199		Business Rates Retention - If income streams from the introduction of the business rates retention scheme in April 2013 are impacted by the loss of major business & the constrained ability to grow the business rates in the town then the MTFS budget gap may increase.	Gemma Bell	Impact - 4 Probability - 3 Score - 12	No change.	Reduce	- Part of Gloucestershire Pool - Ongoing monitoring of performance - Monitoring of business rate growth - Work with Local Enterprise Partnership	31/03/2025
396		Business Continuity - If CBC does not have adequate business continuity plans in place then this could impact the Council's ability to deliver services leading to resident hardship, financial loss & reputational damage.	Claire Hughes	Impact - 4 Probability – 2 Score - 12	Probability reduced due to mitigations now in place.	Accept	- Business Continuity Plans updated for all service areas - Business Impact Analysis completed - Corporate Recovery Plan in place	31/03/2025
168		Ability to resource/manage multiple concurrent incidents - If we have multiple concurrent incidents we may not be able to resource them all & this will impact effectiveness of response & impact business continuity.	Gareth Edmundson	Impact - 4 Probability - 3 Score - 12	No change.	Reduce	- Local Resilience Forum Tactical Comm& Group Meetings - Emergency Planning - Local Resilience Forum Strategic Comm& - Cabinet Engagement - Budget proposals - Directors Gold training completed	31/03/2025
295		Compliance with Property Legislation & Regulations - If we are not compliant with relevant legislation / regulations in all operational CBC properties then this may result in accidents resulting in reputational damage, fines and potential corporate manslaughter charges.	Gemma Bell	Impact - 4 Probability - 3 Score - 12	No change.	Reduce	- Compliance Officer in post - External Advisors being utilised - Increased resource capacity of building surveyors - Planned maintenance work to understand structural risks and plan remedial work - - Review of registers & risk assessments	31/03/2025
CH5		Tenant Satisfaction - If there is a decline in the quality of services delivered to tenant's, then this may result in reduction in customer satisfaction (evidenced through the TSMs) affecting the quality of life experienced by residents in Cheltenham and leading to referral to the Housing Ombudsman and/or Regulator for Social Housing.	Claire Hughes	Impact - 4 Probability - 3 Score - 12	No change.	Reduce	- Effective oversight of service delivery performance by senior officers, Cabinet and Housing cabinet committee. - Review and monitoring of service standards. - Effective tenant voice and listening and acting on tenant feedback. - Learning from complaints. - Review of nation TSM data	31/01/2025

ID	Risk Matrix	Risk Description	Owner	Score	Status	Response	Mitigations	Date
406	Impact / Probability	Recycling - IF EPR payments do not adequately cover the current income streams & costs for CBC then there may be a negative impact on the MTFS which would worsen if GCC recycling credit payments reduce or cease for out of scope EPR materials.	Karen Watson	Impact - 3 Probability - 4 Score – 12	New Strategic Risk	Accept or reduce	- Maximising income from materials via high quality is essential in mitigating any financial loss however the EPR mechanism details have yet to be publicised (hopefully Nov/Dec 2024) which may provide assurance or clarity.	28/02/2025
407	Impact / Probability	Waste Collection - If Waste Collection Authorities such as CBC are responsible for payment of some of the new emissions tax due 2028 (ETS) for refuse disposed of at Javelin Park EFW then this will have a negative financial impact on the MTFS.	Karen Watson	Impact – 3 Probability – 4 Score - 12	New Strategic Risk	Accept or Reduce	- Details are unclear regarding the mechanism for calculations or payment of the new emissions tax yet. GRWP are looking at this for the County as this will impact all authorities potentially. LGA forecasts look bleak but mechanism for 2 tier authorities is unknown therefore unclear how much responsibility WDA will be required to assume.	28/02/2025
404	Impact / Probability	Corporate Resource – If there is insufficient progress on the development of a new strategic waste depot site then this may impact the resilience of waste collection and may result in additional costs to the council.	Karen Watson	Impact - 4 Probability - 3 Score - 12	New Strategic Risk	Reduce	- Establish dedicated resource to deliver the workload required for a business case and formal decision to take forward the programme of works required jointly with CBC/GCC/TBC.	28/02/2025
377	Impact / Probability	Difficulties in recruitment - If we are unable to recruit effective candidates for our vacant roles then we may be unable to deliver corporate plan ambitions & effective operational services leading to increased costs & reputational damage.	Ann Wolstencroft	Impact - 3 Probability - 3 Score - 9	No change.	Reduce	- Ensure wide exposure social media etc. - Grow your Own - Apprentices & Graduates. - Review of applicant response rates by channel.	31/03/2025
387	Impact / Probability	Poor risk management - If the council does not have a robust & effective approach to risk management then then it may result in financial losses, failure to achieve corporate priorities, litigation & reputational damage.	Ann Wolstencroft	Impact - 3 Probability - 3 Score - 9	No change.	Reduce	- Risk Management Training - Leadership Team Risk Discussions - Directorate Risk Discussions - Risk Maturity Audit - Risk Reporting to Audit, Compliance and Governance Committee - Cabinet Reports	31/03/2025
386	Impact / Probability	Leisure & culture services - If the council does not begin to plan the long-term provision of leisure & culture services then it will be unclear about the scope of re procurement of services beginning in 2027.	Richard Gibson	Impact - 3 Probability - 3 Score - 9	No change.	Reduce	- Options appraisal being commissioned	31/01/2025
126	Impact / Probability	Failure to make the Council Carbon Neutral by 2030 - If we fail to make the Council carbon neutral by 2030 then we will not achieve our corporate objectives.	Frances Crick	Impact - 3 Probability - 3 Score - 9	No change.	Reduce	- Specialist resource employed - Climate Change Funding - Climate Change County Level Co-ordination - Climate Change Investment Strategy - Climate Emergency Action - Establish a Climate Emergency Programme Board	28/2/2025

ID	Risk Matrix	Risk Description	Owner	Score	Direction	Response	Actions	Date
							- Secure adequate tools & resources to enable the delivery of the Climate Emergency Action Plan	
216	Impact / Probability	Rough Sleeping Accommodation - If there is insufficient emergency accommodation for households to access in times of emergency (e.g. extreme cold weather) or overnight emergency, then there could be injury to the household.	Martin Stacy	Impact - 3 Probability - 3 Score - 9	⟷ No change.	Accept	- Improving pathways - Additional emergency accommodation provision	31/01/2025
344	Impact / Probability	Climate: Failure to support nature & biodiversity - If we fail to deliver projects to support nature, then there will be a potentially irreversible impact on local biodiversity due to climate change, with implications for the well-being of our communities.	Frances Crick	Impact - 3 Probability - 3 Score - 9	⟷ No change.	Reduce	- Continue to support volunteer activity promoting biodiversity within parks and green spaces - Review CBC contribution to achieving objectives within the Gloucestershire Tree Strategy - Ensure effective implementation of planning requirements in relation to Biodiversity Net Gain (BNG) and Suitable Alternative Natural Greenspace (SANG) - Review the potential for using CBC land to support nature and attract BNG/SANG funding where this is the most cost-effective long-term option	28/2/2025
CH7	Impact / Probability	If the management of void properties does not improve then this will lead to increased costs associated with additional use of temporary accommodation, reduced rent collection and failure to comply with the statutory timescales in relation to the use of temporary accommodation	Claire Hughes	Impact – 3 Probability – 3 Score – 9	New Strategic Housing Risk	Reduce	- Procuring new contractors to carry out void work - Active monitoring of turn around times - Interim manager in place to provide additional support and guidance	30/01/2025
CH1	Impact / Probability	Housing Revenue Account - If the housing revenue account becomes unviable then this may result in the council being unable to fund service delivery, investment in existing homes and the delivery of new housing.	Gemma Bell	Impact - 4 Probability - 2 Score - 8	⟷ No change.	Reduce	- Setting deliverable savings targets through the 2025/26 budget setting process - Ensure 30 year HRA financial model is in place and is reviewed and updated by regular stress testing. - Explore arrangements to re-finance the existing temporary debt taken by the HRA - Work collaboratively with the major developments team to bring new properties online to increase the rental income generated from the HRA - Ongoing action regarding the turnaround of void properties to maximise the rental income generated from the existing stock	31/03/2025

89		Rough Sleeping Initiative Funding - If DHLUC reduce/end RSI funding (£1m/year county-wide), with the expectation that services will be baselined into council budgets from April 2025 onwards then existing Rough Sleeping prevention services will either cease, or CBC will have to build funding into our own budgets in order for services to continue.	Martin Stacy	Impact - 3 Probability - 2 Score - 6	Reduction in probability as additional funding from government has been made available	Accept	- Use of Homelessness Prevention Grant - Confirmation from MHCLG that transitional funding will be available for 12 months from April 2025, while thought is being given to future funding post April 2026.	28/02/2025
410		Devolution – If the devolution of powers from government and the creation of strategic authorities is not managed effectively then there is the potential of disruption to certain services.	Gareth Edmundson	Impact – 3 Probability – 2 Score - 6	New Strategic Risk	Reduce	- Engagement with government. - Participation in county discussions.	28/02/2025

Cheltenham Borough Council

Cabinet – 18 February 2025

Discretionary Business Rate Reliefs

Accountable member:

Councillor Alisha Lewis, Cabinet Member Finance and Assets

Accountable officer:

Jayne Gilpin, Head of Revenues and Benefits

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

The purpose of this report is to seek approval for the extension of the Retail Hospitality, Leisure business rate relief scheme in 2025/26 and to update the Discretionary Rate Relief and Hardship Relief policies to reflect recent changes in legislation. The polices are also being merged into one new policy. All schemes are administered and relief awarded using the council's discretionary powers under the Local Government Finance Act 1988.

Recommendations: That Cabinet:

1. **approves Discretionary Rate Relief Policy set out in Appendix 3.**

2. **authorises the Head of Revenues and Benefits in consultation with the Cabinet Member Finance and Assets to implement any changes to the temporary relief schemes detailed in Appendix 3, as required by Government, or to ensure the successful operation of the schemes.**

3. **delegates decisions relating to the award of Discretionary Rate Relief in section 2, Hardship Relief in section 3 and Partly Occupied Relief in Section 4 of the policy in Appendix 3 as follows**

   - **Awards of up to £20,000 to be determined by the Head of Revenues and Benefits with reconsiderations being determined by the Deputy Chief Executive**
   - **Awards between £20,000 and £100,000 to be determined by the Deputy Chief Executive with reconsiderations being determined by the Cabinet Member Finance and Assets**

4. **due to the volume of cases, delegates decisions in respect the award of temporary reliefs detailed in Appendix 3 to the Head of Revenues and Benefits and officers in the Business Rates team. In the case of a dispute reconsideration is to be made by the Deputy Chief Executive and Section 151 Officer.**

5. **authorises the Monitoring Officer to make the necessary changes to the Council's Constitution**

---

1. Implications

1.1 Financial, Property and Asset implications

Discretionary Rate Relief reduces the business rates paid by businesses thereby reducing the income this council receives. The Government fully funds the temporary reliefs referred to in the policy via section 31 grant. In accordance with the Business Rates Retention rules this council is required to fund 40% of other reliefs awarded whilst the Government funds 50% and Gloucestershire County Council 10%.

The council cannot award Discretionary Rate Relief to itself or any precepting authority

No significant changes are being proposed so the expenditure, which is £53,600 in 2024/25, is not expected to increase as a result of the policy amendments.

Signed off by: Gemma Bell, Director of Finance and Assets
gemma.bell@cheltenham.gov.uk

1.2 Legal implications

The main provision conferring the discretionary power on billing authorities to grant rate relief appears in Section 47 of the Local Government Finance Act 1988 (as amended).

1The Council has a duty to carefully consider every application on its merits, taking into account the contribution that the organisation makes to the amenities of the area. There is no statutory appeal process against any decision made by the Council on these types of application. However, as with any decision of a public authority, decisions can be challenged by Judicial Review.

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

1.3 Environmental and climate change implications

The Climate Change Assessment Tool has been completed and no action is required. The report is in appendix 2.

Signed off by: maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity.
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

In order to ensure that support, funded by council taxpayers, reaches those most in need but the Council will consider more favourably applications from organisations that work in Cheltenham to support, or provide facilities to, vulnerable, disadvantaged, or underrepresented groups.

1.6 Performance management – monitoring and review

Business ratepayers in receipt of Discretionary Rate Relief are reviewed by the business rates team annually.

The Discretionary Rate Relief policy will now be reviewed every three years unless there is a specific requirement to review sooner. The number of businesses benefiting from this scheme and the total amount awarded will be monitored by the Head of Revenues and Benefits and are reported to the Government periodically

The number of businesses benefiting from temporary relief schemes and the total

amount awarded will be monitored by the Head of Revenues and Benefits and are reported to the Government periodically

---

2 Background

2.1 Business rates is a national scheme and rates are charged on most non-domestic properties. They are based on a property's rateable value, which is assigned by the Valuation Office Agency, and the multiplier, which is set by the Government each year. As the billing authority this Council's role is to administer the scheme but it has no power to set the level of business rates.

2.2 Various reliefs are available which can reduce business rates bills for eligible businesses. Some are mandatory and the council must award these where businesses meet the specified conditions eg mandatory relief for charities and small business rate relief.

2.3 The Council also has discretionary powers to grant relief from business rates, in certain circumstances, under the provision of sections, 47, 49 and 44a of the Local Government Finance Act, as amended.

2.4 The types of discretionary relief under these provisions are as follows:

- Discretionary Rate Relief in specified circumstances, to charitable and non-profit making organisations, under Section 47 of the Local Government Finance Act 1988

- Hardship relief under Section 49 of the Local Government Finance Act 1988

- Relief for premises partly occupied for a short period under section 44A of the Local Government Finance Act 1988

- Temporary relief schemes fully funded by Government, awarded under Section 47 of the Local Government Finance Act 1988

2.5 Due to recent legislation changes, which have Implications for Discretionary Rate Relief under section 47 and Hardship Relief under section 49, this report proposes some minor amendments to existing policies. In addition, as there are currently several polices these are now being brought together in one policy which will make it simpler for business ratepayers and for staff administering reliefs.

2.6 In recent years the Government has also introduced some temporary business

rate reliefs, including Retail, Hospitality and Leisure Relief which reduces business rate bills for businesses in the retail, hospitality and leisure sectors. In the Autumn statement 2024 it was confirmed that this relief will continue for 2025/26. The amount of relief will be 40% in 2025/26, a reduction from the 75% relief awarded in 2024/25.

2.7 Where schemes are a temporary measure the Government has not changed legislation. Councils are expected to use their discretionary powers to award relief under section 47 of the Local Government Finance Act 1988, and adopt a scheme using the detailed guidance provided by Government.

2.8 Rather than having a separate policy for the temporary relief schemes funded by Government these are being included as an appendix to the new policy, again so that all reliefs are contained in one policy document and as these schemes vary, often on an annual basis, the appendix can be amended.

2.9 In 2024/25, discretionary relief of £53,000 has been awarded to 15 charitable and non-profit making organisations, no hardship relief has been awarded and one property has benefitted from a reduction due to being partly occupied.

2.10 The Government fully funds the temporary relief schemes and this council funds 40% of other discretionary reliefs in accordance with business rates retention rules.

3 Changes to Relief schemes

3.1 The Non-domestic Rating Act 2023 amended section 47 of Local Government Finance Act 1988 to remove a restriction on the time limits for backdating of decisions and the notification for any variation to relief, allowing Councils to set their own time limits.

3.2 Previously, awards could be backdated to the 1st April in the preceding financial year, but only if the decision was made before the 30 September, making the maximum period that an award could be backdated 18 months. A full one year's notice was required to make any variations to the decision to award relief.

3.3 Point 2.15 of the policy in appendix 3 will allow the Council to award relief from the date liability commences or the beginning of the financial year in which the application is received, whichever is later. This will allow for a reasonable period of backdating whilst at the same time enabling sufficient verification to ensure requirements have been met for the backdated period.

3.4 Point 2.20 of the policy in appendix 3 will allow the council to determine the effective date to either vary the level of relief or to revoke a decision to award relief.

3.5 The Non-domestic Rating (Multipliers and Private Schools) Bill, which at time of writing this report is progressing through Parliament, makes provision for private schools to no longer be eligible for mandatory charitable relief from April 2025.

3.6 Point 2.11 in respect of Discretionary Rate Relief and point 4.15 (d) in respect of Hardship Relief have been amended, to exclude organisations no longer being entitled to Mandatory Relief due to changes in Government policy, from being eligible.

3.7 No other changes are being made to the qualifying criteria for the reliefs but some minor amendments have been made to update references to terms such as subsidy control, fraud awareness and the phrasing of some points for ease of understanding.

4 Reasons for recommendations

4.1 The discretionary relief policy in appendix 3 merges existing polices into one new policy document making it easier for business rate payers and staff.

4.2 Some amendments have been made to reflect recent legislation changes and changes due from April 2025.

4.3 Delegated authority to award reliefs has been reviewed with the Monitoring Officer and are being updated to ensure efficiency when considering applications whilst complying with the Council's constitution.

4.4 Approval is being sought as detailed in the recommendations. Authority is also being sought for the Monitoring Officer to make the necessary amendments to the Council's constitution. In cases where the value of relief would be greater than £100,000 Cabinet will determine the application.

4.5 The Council is required to adopt a retail, hospitality and leisure scheme for 2025/26 to ensure eligible businesses continue to receive this vital support. As the temporary relief schemes are fully funded by the Government and large volumes of business ratepayers are eligible, approval is being sought to delegate decisions to the Head of Revenues and Benefits and staff in the business rates team.

5 Alternative options considered

5.1 None. The Council is required to consider any application for relief under the discretionary powers referred to in this report. Adopting a policy setting out the circumstances and any criteria that must be met ensures consistency and fairness for business rate payers.

6   Consultation and feedback

6.1 No consultation has been undertaken. The policy is not new and no significant changes have been made

7   Key risks

7.1 The risks are in Appendix 1

Report author:

Jayne Gilpin, Head of Revenues and Benefits jayne.gilpin@cheltenham.gov.uk

Appendices:

    i.   Risk Assessment
    ii.   Equality Impact Assessment Screening
    iii. Discretionary Rate Relief Policy
    iv.   Climate Change Assessment

Background information:

    1.   The Local Government Finance Act 1988 , amended
          https://www.legislation.gov.uk/ukpga/1988/41/contents
    2.   The Non Domestic Rating Act 2023
    3.   https://www.legislation.gov.uk/ukpga/2023/53/contents
    4.   The Non-domestic Rating (Multipliers and Private Schools) Bill
    5.   https://bills.parliament.uk/bills/3887

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the recommendation regarding changes to policies are not approved then there may be an increase in applications for relief due to government policy changes	Jayne Gilpin	3	1	3	Accept	Approve the schemes in the appendix to the policy in appendix 3 Monthly monitoring and an annual review of the scheme	Jayne Gilpin	18/02/2025
	If the recommendations in this report relating to temporary reliefs are not approved funding will not be distributed to businesses and residents in need of support which could cause reputational damage to the Council	Jayne Gilpin	3	1	3	Accept	Approve the policy	Jayne Gilpin	18/02/2025

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions

Appendix 2:   Equality Impact Assessment Screening

---

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Jayne Gilpin	Service Area: Revenues and Benefits
Title: Head of Revenues and Benefits	Date of assessment: 27/01/2025
Signature: Jayne Gilpin	

b. Is this a policy, function, strategy, service change or project?

Policy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

Discretionary Business Rate Reliefs

Is this new or existing?	**Already exists and is being reviewed**

Please specify reason for change or development of policy, function, strategy, service change or project

Polices already exist for discretionary business rate reliefs. Amendments are being made to reflect legislation changes and an extension of retail relief into 2025/26

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To approve changes to the discretionary business rate relief policy from 2025/26
Objectives:	To approve the revised policy to be effective from 2025/26. The policy brings together existing policies into one policy going forward. It also incorporates changes to reflect changes in legislation and the extension of retail reliefs in 2025/26

Outcomes:	
Benefits:	Eligible businesses receive a reduction to their business rate bill. The changes to existing policies do change the eligibility criteria. Businesses in the retail, hospitality and leisure sector will benefit from reduced bills in 2025/26 if the scheme is approved

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**No**
Do you expect the impacts to be positive or negative?	**No impact expected**
Please provide an explanation for your answer:	
Discretionary rate relief policies are being updated with some minor amendments to reflect legislation changes. The retail relief scheme has also been extended by Government for 2025/26 and needs to be approved as relief is awarded using the council's discretionary powers. All schemes reduce business rate bills for eligible businesses. .	

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

f. Identify next steps as appropriate

Stage Two required	**No**
Owner of Stage Two assessment	**Jayne Gilpin**
Completion date for Stage Two assessment	**27/01/2025**

ss

This page is intentionally left blank

Cheltenham Borough Council

Discretionary Rate Relief Policy

Cabinet 18 February 2025

1   Purpose of the policy

1.1   The Local Government Finance Act 1988 makes provision for local authorities to award business rate reliefs in certain defined circumstances. Relief falls into categories, mandatory and discretionary.

1.2   Whilst the Council is obliged to grant mandatory relief to eligible businesses it has powers to grant discretionary reliefs to ratepayers subject to certain criteria being met.

1.3   The purpose of this policy is to set out the circumstances in which the council will exercise its discretion to award business rates relief under Section 44A, Section 47 and Section 49 of the Local Government Finance Act 1988, as amended.
        This policy includes the following:

Section 2   Discretionary rate Relief under Section 47 of Local Government Finance Act 1988

Section 3   Hardship Relief under section 49 of Local Government Finance Act 1988

Section 4   Relief for partly occupied properties under section 44A of Local Government Finance Act 1988

Appendix   Temporary relief schemes funded by Government

2   Discretionary Rate Relief

2.1   Section 47 of the Local Government Finance Act 1988, as amended, gives the Council discretion to award relief where certain conditions are met and where it would be in the interest of council taxpayers.

2.2   The granting of relief falls broadly into the following categories:

a)   Discretionary relief top up for registered charities and community amateur sports clubs already receiving mandatory relief.

b)   Discretionary relief for organisations or institutions not established or conducted for profit whose main objects are charitable or are otherwise philanthropic or religious or concerned with education, social welfare, science, literature or the fine arts.

c) Discretionary Relief for clubs, societies and other organisations not established or conducted for profit and wholly or mainly used for purposes of recreation.

d) Discretionary Relief granted to ratepayers under the Localism Act 2011 provisions eg Temporary relief schemes for specified businesses or in specified circumstances

2.3 The Council has adopted this policy, detailing the criteria by which applications will be considered and the level of relief, to ensure consistency in the granting of relief.

Policy for granting relief

2.4 Where mandatory relief has been granted the council will not normally grant top up discretionary relief (type a) but will consider more favourably, applications from organisations providing advice and support of a social welfare nature to vulnerable residents. The facilities must be available to Cheltenham residents should they be in need of the advice and support being provided.

2.5 Organisations applying for relief must be able to demonstrate that the activities it provides are for the benefit of and are being used by the local community. The extent to which Cheltenham residents benefit from the facilities will be considered.

2.6 Membership of the organisation must be open to all sections of the community without any discrimination. In general membership should not be exclusive or restrictive. If access is restricted it must be for justifiable reasons such as a recognised need to provide a facility to a specific sector of the community.

2.7 If the organisation charges a membership or entry fee they must not be set at such a level as to exclude the general community. Fees may be set at different rates for different classes of membership such as juniors, students, etc

2.8 Where the organisation runs a bar, eg a sports club, it should be ancillary to the facilities or services being provided. Consideration will be given to the extent to which a bar supports the overall operation and to the income generated.

2.9 Business rate payers making application must demonstrate the following:

a) The facilities or services meet local needs and provide a significant benefit to local residents.

b) The organisation actively encourages membership and facilities are either widely available, or, provided to particular groups in the community such as young people, women, older age groups, disabled people, under-represented or disadvantaged groups etc.

c) The facilities are made available to non-members and are being used by schools, casual public sessions, under-represented or disadvantaged groups in the community.

d) Where education or training is being provided it should develop the skills of local residents, especially disadvantaged groups and any fees being charged must not be at a value to exclude the general community.

e) Services or facilities are being provided which relieves the Council of the need to do provide similar facilities or supplements those which it does provide e.g. additional sporting facilities.

Amount of Relief

2.10 The amount of relief that can be awarded is set out in the table below

	Type of Organisation	**Discretionary Relief to be Granted**
A	Registered charities and community amateur sports clubs already entitled to 80% mandatory relief.	20% to top up mandatory in specified circumstances only (See point 2.4 above)
B	Non-profit making institutions or organisations whose main objectives are charitable, philanthropic, religious, concerned with education, social welfare, science, literature or the fine arts	Maximum 80% discretionary relief will be awarded
C	Clubs, societies and other organisations set up for the purpose of recreation and not established or conducted for profit	Maximum 50% discretionary relief will be awarded
D	Discretionary Relief granted to ratepayers generally	Maximum relief not determined See Temporary relief in schemes appendix A

Relief will not be awarded

2.11 Relief will not be awarded to charities and charitable organisations, including private schools, no longer entitled to mandatory relief as a result of a change in Government policy.

2.12 Relief will not be awarded where organisations cannot demonstrate to the Council's satisfaction that their main purpose is, as defined by section 47 of the Local Government Finance Act 1988, or that they are not established or conducted for profit.

2.13 Relief will not be awarded to businesses not providing relevant or sufficient information to allow the application to be fully considered.

How relief is provided

2.14   Business ratepayers applying for discretionary rate relief must complete the council's application form and provide any additional information requested.

2.15   Discretionary relief will be granted from the date liability commences or the beginning of the financial year in which the application is received, whichever is later.

2.16   All recipients of relief must notify the council within 21 days of any change in circumstances which may affect their entitlement. If the business ratepayer failed to notify the council of a change affecting entitlement relief may be revoked retrospectively

2.17   Discretionary relief will be recalculated or cancelled to reflect any change in circumstances that affect entitlement, changes to entries in Rating List, or where any conditions cease to be met.

2.18   Periodic reviews will be undertaken and a new application may be required.

2.19   The order in which relief is granted is specified. Mandatory relief shall be granted in all cases where the criteria is met irrespective of whether discretionary relief can be granted or not.

2.20   Variations in any decision will be notified to ratepayers as soon as practicable and will take effect on a date determined by the Council. A decision may be revoked at any time.

Subsidy control

2.21   Rate Relief for charities and non-profit making bodies is not normally considered a qualifying subsidy because the recipients are not in market competition with other businesses. However, if the organisation is engaged in commercial activities, competes with commercial bodies or has a commercial partner then rate relief could constitute subsidy and will be subject to the Government set limits.

Decision Making

2.22   Applications will be determined by the Head of Revenues and Benefits where the value of relief to be awarded is no more than £20,000.

2.23   The Deputy Chief Executive will determine applications where the value of relief to be awarded is between £20,000 and £100,000. Where relief would exceed this sum Cabinet will be required to approve any such award.

2.24   There is no statutory appeal process against any decision made by the council under section 47 of the Local government Finance Act 1988, although, as with any decision made by a public authority, the decision can be reviewed by Judicial Review. However, ratepayers dissatisfied with the initial decision will have a right to request a re-consideration.

2.25   The request must be made within 28 days of being notified of the initial decision. The Deputy Chief Executive will consider requests where the relief is up to £20,000 and the Cabinet Member for Finance and Assets in cases where the value of relief being considered is between £20,000 and £100,000.

2.26   Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

3   Hardship Relief

Legal Requirements

3.1   Section 49 of the Local Government Finance Act 1988 provides a Local Authority with the discretion to reduce or remit payment of rates under the grounds of hardship.

3.2   The Council can use its discretion to reduce or remit the payment of rates where it is satisfied that the customer would sustain hardship if it did not do so, and, that it is reasonable to award relief, having taken into account the interests of the Council Taxpayers.

General Conditions

3.3   The Council will consider applications from businesses on their own merits and on a case by case basis.

3.4   Relief under this provision will only be granted in exceptional circumstances.

3.5   Applications must be on the Council's official application form and be signed by the ratepayer or authorised company representative.

3.6   The ratepayer must demonstrate that hardship exists and provide details of what are believed to be the responsible factors. Evidence must be provided to support the application and any additional information requested must also be supplied.

3.7   The ratepayer is expected to have taken appropriate action to mitigate or alleviate their hardship by, for example:

- taking independent professional business advice
- reviewing their pricing structure or its approach to income generation
- re-negotiating with creditors, including any financial institutions; service providers, landlord regarding rent
- having a business plan in place to address the hardship

3.8   Applications may shared with relevant Council departments or partners, as appropriate, to ascertain whether grants or other support may be available.

3.9 There must be a benefit to the local community and this will normally outweigh any financial cost of granting the relief.

3.10 Relief will only be awarded for a short period of time and not on an on-going basis. It will only be awarded in respect of the financial year in which the application is made and will end no later 31 March.

3.11 Relief of up to 100% of the rate liability may be awarded but the Council will normally expect applicants to pay a portion of their rate liability.

3.12 The ratepayer must notify the Council of any change in circumstances during the period for which relief has been awarded, financial or otherwise. In all cases Hardship Relief will end in the following circumstances:

- At the end of a financial year
- If there is a change of liable person
- The property becomes empty or unoccupied
- The ratepayer enters any form of Insolvency proceedings, including but not limited to winding up, liquidation, administration or bankruptcy.
- The ratepayer seeks and enters into a restructuring plan
- The ratepayer's financial circumstances change

3.13 Hardship Relief will be calculated as a percentage of the Business Rates bill. Should the Business Rates bill reduce within the period Hardship Rate Relief is granted, the relief will be reduced proportionately. If the Business Rates bill increases within the period Hardship Relief is granted, i.e. an increase in rateable value, the amount awarded will not automatically be increased. In such cases, the Council, will reconsider the application and may award additional relief.

Factors taken into account when considering applications

3.14 The following factors will be taken into account when determining whether relief should be awarded:

a) Whether the business is likely to survive without assistance through hardship relief
b) Whether the closure of the business would deprive the local community of a service or facility which is considered essential or of major importance
c) What action, if any, the business has taken to improve the position or seek assistance from other external sources.
d) The extent to which the business provides employment in the local area, the number of people employed, and likely to become unemployed if the business closes.
e) The presence of an improvement plan and the likelihood that it will succeed.
f) The presence of including reserves and assets which could be utilises to improve the position
g) The factors causing the hardship should be of a limited duration and should be beyond the control of the ratepayer. It should be reasonable to expect that conditions will improve
h) The effectiveness of granting the relief. In particular whether the future of the business is likely to be unsustainable even if relief is granted

    i)   Any other relevant factor

3.15   The Council may consider not awarding relief in the following circumstances:

    a)   Where it appears that the business is failing due to general market forces.
    b)   Where it appears that the business is suffering hardship due to inadequate financial management
    c)   Where it appears that the business is suffering financial hardship due to excessive speculation
    d)   Where business rates have become due or increased as a result of a change in Government policy resulting in the business no longer being entitled to other reliefs
    e)   Where the owners/directors are making excessive drawings from the business
    f)   Where expenses are considered by the council to be excessive
    g)   Where it appears that the business is likely to survive without assistance through hardship relief
    h)   Where sufficient or requested information has not been supplied

Subsidy Control

3.16   Hardship relief for businesses engaged in commercial activities, which compete with other commercial bodies or have a commercial partner, would constitute a qualifying subsidy and will be subject to the Government set limits.

Decision Making

3.17   Applications will be determined by the Head of Revenues and Benefits where the value of relief to be awarded is no more than £20,000.

3.18   The Deputy Chief Executive will determine applications where the value of relief to be awarded is between £20,000 and £100,000. Where relief would exceed this sum Cabinet will be required to approve any such award.

3.19   There is no statutory appeal process against any decision made by the council under section 49 of the Local government Finance Act 1988, although, as with any decision made by a public authority, the decision can be reviewed by Judicial Review. However, ratepayers dissatisfied with the initial decision will have a right to request a re-consideration.

3.20   The request must be made within 28 days of being notified of the initial decision. The Deputy Chief Executive will consider requests where the relief is up to £20,000 and the Cabinet Member for Finance and Assets in cases where the value of relief being considered is between £20,000 and £100,000.

3.21   If an unsuccessful applicant requests a reconsideration they will need to continue to pay their rates bill. Once the reconsideration has been carried out, the ratepayer will be informed, in writing, of the decision.

3.22   Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

4   Relief for properties partly occupied for a temporary period

General Explanation

4.1   A ratepayer is liable for the full business rates whether a property is wholly occupied or only partly occupied.

4.2   Section 44a of the Local Government Finance Act 1988 provides councils with discretion to apply rate relief in certain circumstances where part of a property is unoccupied, provided it will remain so for a short time only.

4.3   In these circumstances the council has the discretion to request that the Valuation Office Agency apportions the rateable value of the property between occupied and unoccupied parts for the specified period.

How Relief is provided

4.4   The part occupation must be for a temporary period only. Rate relief will not be awarded where the partial occupation is due to the normal day to day operation of the business, for example where a warehouse has dispatched a large order and no longer needs to store stock or a business occupied premises larger than needed leaving an area unused.

4.5   Awarding relief will only be considered in respect of unoccupied parts of a property that can be clearly defined and are reasonably segregated from the occupied part of the property.

4.6   A ratepayer must make an application for this relief to the Council and will be required to provide the following information:

- A plan of the property clearly showing the dimensions of the occupied and unoccupied area. The plan must be of a sufficient quality to enable the Valuation Office Agency to apportion the rateable value of the property between the occupied and unoccupied areas.
- An explanation of why part of the property is temporarily not being used
- The period relief is being requested for (see point below for limits)
- An explanation of any short term practical or financial difficulties in either occupying or vacating the premises.
- Details of the plans to use the property to full capacity, or move to other premises, with timescales
- Access to the premises so that the Council can inspect the occupied and unoccupied parts, if deemed necessary
- Any additional information requested

4.7 Applications must be made, all information provided, and if necessary a site visit made, during the period that relief is being claimed for. The council will not consider applications for retrospective periods.

4.8 Applications will not be considered until all of the required information has been received and if required a site visit has been made.

4.9 Upon receipt of an application the council may request that the Valuation Office Agency issues a certificate apportioning the rateable value for the property, splitting it between occupied and unoccupied parts. Relief will not be awarded be unless a certificate is issued.

4.10 Partially occupied relief will end when the soonest of the following occurs:

- The financial year comes to an end
- The end of a specified award period
- Where part or all the unoccupied parts become occupied
- Where the whole of the property becomes unoccupied
- Where the liability for the property changes.

4.11 Any relief awarded will be determined by a recalculation of business rates for the relevant period based on the apportioned rateable value issued by the Valuation Office Agency.

4.12 The business ratepayer must notify the council within 21 days of any change in circumstances which may affect their entitlement to this relief.

4.13 Relief will be recalculated or cancelled to reflect any change in circumstances that affect entitlement, changes to entries in Rating List, or where any conditions cease to be met.

4.14 Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

Decision Making

4.15 Applications will be considered by members of the business rates team and where the requirements in this policy have been met the application will be made to the Valuation Office Agency.

4.16 The award of any relief will be determined by the Head of Revenues and Benefits where the value is no more than £20,000.

4.17 The Deputy Chief Executive will determine relief to be awarded where the value is between £20,000 and £100,000. Where relief would exceed this sum Cabinet will be required to approve any such award.

4.18   There is no statutory appeal process against any decision made by the council under section 44A of the Local government Finance Act 1988, although, as with any decision made by a public authority, the decision can be reviewed by Judicial Review. However, ratepayers dissatisfied with the initial decision will have a right to request a re-consideration.

4.19   The request must be made within 28 days of being notified of the initial decision. The Deputy Chief Executive will consider requests where the relief is up to £20,000 and the Cabinet Member for Finance and Assets in cases where the value of relief being considered is between £20,000 and £100,000.

4.20   If an unsuccessful applicant requests a reconsideration they will need to continue to pay their rates bill. Once the reconsideration has been carried out, the ratepayer will be informed, in writing, of the decision

Appendix A

Temporary business Rate Reliefs

A1   General Explanation

A1.1   From time to time, additional measures are proposed by the Government to provide assistance to businesses. These can be either national schemes or locally defined schemes.

A1.2   As these schemes are usually only applicable for a temporary specific period they are not embedded in legislation and councils are expected to use discretionary powers under Section 47 of the Local Government finance Act 1988 (as amended) to grant relief in accordance with any guidance provided.

A1.3   The Government will fully reimburse Councils for the cost of the temporary reliefs in this appendix, they are awarded in line with the guidance.

A2   Retail Hospitality and Leisure Relief Scheme 2025/26

A2.1   The 2025/26 Retail, Hospitality and Leisure Relief scheme will provide eligible occupied, retail, hospitality and leisure businesses with 40% relief of the chargeable business rates liability. Businesses may claim the relief up to a limit of £110,000 per business across all eligible properties in England.

A2.2   Properties that are eligible for Retail, Leisure and Hospitality Relief will be occupied and wholly or mainly used as shops, restaurants, cafes, drinking establishments, cinemas, live music venues, assembly for leisure, hotels, guest and boarding premises or self-catering accommodation. The full guidance provided by the Ministry of Housing, Communities and Local Government (MHCLG) is available here.

https://www.gov.uk/guidance/business-rates-relief-202526-retail-hospitality-and-leisure-scheme

A2.3   The relief will be awarded to business ratepayers that meet the eligibility criteria in the guidance.

A2.4   The level of relief is 40% of the chargeable amount, to be applied after mandatory reliefs and other discretionary reliefs. There is no rateable value threshold limit.

A2.5   The relief is subject to a cash cap preventing any business from receiving more than £110,000 of relief across all of its properties in England. Ratepayers that occupy more than one property will be entitled to relief for each eligible property up to maximum £110,000 cash cap to the business. Where a business has a qualifying connection with another business it will be treated as one for the purposes of this cash cap.

A2.6   Businesses may be required to declare that they will not exceed the cash cap if relief is awarded.

A2.7   The Retail Hospitality and Leisure Relief Scheme in 2025/26 is likely to amount to subsidy. Any relief provided under this scheme will need to comply with the UK's domestic and international subsidy control obligations.

A2.8   Business ratepayers, on a self-assessment basis, must declare that by receiving the relief they will not exceed subsidy limits.

A2.9   Businesses can refuse the relief up to 30 April 2025. Once refused the business will become ineligible and cannot withdraw their refusal.

A3   Supporting Small Business Relief 2023/24 – 2025/26

A3.1   2023 Supporting Small Business Relief (SSB) will cap bill increases at £600 for any business losing eligibility for some or all Small Business Rate Relief at the 2023 revaluation.

A3.2   The relief will be available in financial years 2023/24, 2024/25,2025/26 for businesses that continue to meet the eligibility criteria unless their bill reaches the level it would have been without the relief.

A3.3   The relief will be awarded to business ratepayers that meet the eligibility criteria in the guidance provided by the Department for Levelling Up, Housing and Communities (DLUHC). The full guidance is available here https://www.gov.uk/government/publications/business-rates-relief-2023-supporting-small-business-relief-local-authority-guidance

A3.4   Eligible businesses will automatically receive the relief on their bill.

A3.5   The 2023 Supporting Small Business Relief is likely to amount to subsidy. Any relief provided under this scheme will need to comply with the UK's domestic and international subsidy control obligations.

A3.6   Business ratepayers likely to exceed subsidy control limits will be asked, on a self-assessment basis, to declare that by receiving the relief they will not exceed subsidy limits.

A4   Administration

A.4.1   Cheltenham Borough Council will administer the schemes under Section 47 of The Local Government Finance Act 1988 as amended by The Localism Act 2011 and The Non-Domestic Rating (Discretionary Relief) Regulations 1989 (S.I. 1989/1059).

A.4.2   Eligibility for reliefs will be determined in accordance with the guidance provided by the Ministry of Housing, Communities and Local Government (MHCLG)

A.4.3   Reliefs in this policy may be changed to reflect changes to Government guidance or to ensure successful operation of the schemes.

A.4.4   Retail Hospitality and Leisure reliefs under the provisions in this policy will be awarded in respect of the financial year 2025/26 only and they will end on 31 March 2026.

A.4.5   2023 Supporting Small Business Relief under the provisions in this policy, for business ratepayers losing some or all Small Business Rate Relief may be awarded in respect of the financial years 2023/24, 2024/25 and 2025/26

A.4.6   All reliefs will be recalculated or cancelled to reflect any change in circumstances that affect entitlement, changes to entries in Rating List, or where any conditions cease to be met.

A.4.7   Decisions relating to the granting of relief are be delegated to the Head of Revenues and Benefits and staff within the Business Rates Team.

A.4.8   Relief may be granted automatically where information held on the business rate account confirms eligibility in line with the qualifying criteria and that cash caps or subsidy control limits will not be exceeded. In these cases businesses will be asked to notify the council if they are not entitled. In all other cases an application must be submitted with a cash cap and/or subsidy control declaration.

A.4.9   Where reliefs have been awarded businesses must notify the Council within 21 days of any change of circumstances that could affect their entitlement to the relief.

A.4.10   Businesses will be required to provide any information requested to support their application for a relief.

A4.11   There is no statutory right of appeal against a decision made by the Council in respect of Retail Hospitality and Leisure Relief. However, the Council will reconsider the decision if the ratepayer is dissatisfied with the outcome.

A.4.12   The request for a reconsideration must be made within 28 days of the business or agent acting on behalf of the business being issued with an award decision. The review will be carried out by the Deputy Chief Executive.

A.4.13   If an unsuccessful applicant requests a reconsideration they will need to continue to pay their rates bill. Once the reconsideration has been carried out, the ratepayer will be informed, in writing, of the decision.

A.4.14   Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

This page is intentionally left blank

Busines Rates relief schemes from 01/04/25

Key

(dark green)	Significant and/or long-term positive impact identified. No changes needed.
(light green)	Slight or short-term positive impact identified. No changes needed but could be reviewed to improve.
(grey)	Not applicable or no cause for concern.
(yellow)	Slight or short-term negative impact identified. Review to identify possible improvements.
(red)	Significant and/or long-term negative impact identified. Changes needed before proceeding.

This summary of the CIAT should be used to aid your decision making. Please note that red/amber segments simply mean that mitigations and changes should take place not that the project cannot go ahead.

Environmental	Scores	Justification	Recommendation
GHGs	0	There is no connection between this and the policy	0
Air quality	0	There is no connection between this and the policy	0
Sustainable Transport	0	There is no connection between this and the policy	0
Land use change	0	There is no connection between this and the policy	0
Biodiversity	0	There is no connection between this and the policy	0
Soil and waterway health	0	There is no connection between this and the policy	0
Climate Change Adaptation	0	There is no connection between this and the policy	0
Energy Use	0	There is no connection between this and the policy	0
Sustainable Materials	0	There is no connection between this and the policy	0
Waste	0	There is no connection between this and the policy	0

Social	Scores	Justification	Recommendation
Food	0	There is no connection between this and the policy	0

Health	0	There is no connection between this and the policy	0
Housing	0	There is no connection between this and the policy	0
Education	0	There is no connection between this and the policy	0
Community	0	There is no connection between this and the policy	0
Culture	0	There is no connection between this and the policy	0
Accessibility	0	There is no connection between this and the policy	0
Local Economy and Jobs	4	The reliefs will support businesses that are eligible by reducing their busines rate bills	0
Safety	0	There is no connection between this and the policy	0
Equity	1	Eligibility is based on financial circumstances alone	0
Democratic Voice	0	No requirement to consult with residents on proposals	0

Cheltenham Borough Council

Cabinet – 18 February 2025

Local Development Scheme 2025

Accountable member:

Cllr Mike Collins, Cabinet Member for Planning and Building Control

Accountable officer:

Tracey Birkinshaw, Director of Community and Economic Development

Ward(s) affected:

All

Key Decision:

Yes. A Climate Change impact assessment has not been completed for this decision as it relates wholly to the timetable for the preparation of the council's statutory development plan. However, the outputs driven by the decision will be subject to assessment.

Executive summary:

The Cheltenham Borough Local Development Scheme (LDS) outlines the timetable for preparing statutory development plan documents in the Borough. It is a statutory requirement under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). Due to Government announcements and requirements, the current LDS (2023) needs to be updated.

Recommendations: That Cabinet:

1.   **Adopts the updated Local Development Scheme for Cheltenham Borough, attached to the report at Appendix 3 to take effect immediately.**

2.   **Delegates authority to the Director of Community and Economic Development, in consultation with the Cabinet Member for Planning**

and Building Control, to prepare the Local Development Scheme for publication correcting any minor errors such as spelling, grammar, typographical and formatting changes that do not affect the substantive content of the Local Development Scheme.

1. Implications

1.1. Financial, Property and Asset implications

There are currently no additional budget implications from expediting the timeline for the production of the SLP. The partner councils each make an annual contribution for the costs of the work on the SLP. The work concerned was included in the contributions for the term of the current SLP. Future contributions will be agreed as part of the review of the future of the SLP when the current agreement concludes. The preparation of the SLP within a limited timeframe will require significant resources. To provide for this, the partner councils each make an annual contribution to a joint funding pot to be used for shared officer resource and other costs such as external evidence studies, digital mapping software and the consultation portal. This agreement runs for three years and will need to be reviewed in due course. The authorities have appointed an SLP Manager to oversee the overall budget and programme and to work with senior leads from each partner council, should issues arise.

Signed off by: Director of Finance and Assets (Deputy Section 151 Officer) gemma.bell@cheltenham.gov.uk

1.2. Legal implications

The preparation and maintaining of a Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). This must specify (among other matters) the documents which, when prepared, will comprise the Local Plan for the area (development plan documents), the subject matter and geographical area to which each document is to relate, which if any are to be prepared jointly with one or more other local planning authorities and the timetable for the preparation and revision of those documents. The Local Plan, together with Neighbourhood Plans as well as any Mineral and Waste Local Plans, make the Development Plan for the Council.

Section 28 of the Planning and Compulsory Purchase Act 2004 provides that where a development plan document is prepared jointly by two or more local planning authorities any step which may be or is required to be taken in relation to the document (including adoption) must be done by each of the authorities.

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that in the preparation of a local plan the local planning

authority must notify certain bodies and persons of the subject of a local plan and invite them to make representations to the local planning authority about what a local plan with the subject ought to contain (and then must take any representations made to such invitations into account when preparing the plan). Persons at this stage include such residents or other persons carrying on business in the local planning authority's areas from which the local planning authority consider it appropriate to invite representations and it is for the local planning authority therefore to consider the appropriate persons and methods for consultation at this stage; and such consultation may take a more focused form.

Whereas under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 there are requirements for publication of proposed submission documents and a formal representations procedure (which must be for a period of not less than 6 weeks) to take place before the local plan is submitted to the Secretary of State for examination.

The local planning authority will still need to ensure that reasonable alternatives have been adequately considered through plan-making.

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

1.3. **Environmental and climate change implications**

None arising directly from this report. However, any documents subject to the programme set by the Local Development Scheme are key in terms of the delivery of the sustainable growth of Cheltenham and will have social and environmental implications. The outcomes of the statutory development plan will be key tools in articulating part of the council's response to the Climate Emergency. The Council's Climate Change Impact Assessment tool will be used across the documents relevant to the LDS which consider both micro and macro impacts including;

- Creating strong communities and ensuring social welfare, reflecting healthy place shaping commitments

- Addressing the climate crisis and some of the main causes of climate change. Considering the impacts of the climate emergency and the council's commitment to being net zero by 2030 will help to ensure projects and policies are approved are in line with these climate commitments

- Addressing the ecological crisis, which has highlighted the negative impact our actions and behaviours have on plant and animal life. The UK has lost a lot of biodiversity (variety of plant and animal life) which is critical for our collective survival.

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

1.4. **Corporate Plan Priorities**

This report, through the facilitation of the development plan, supports delivery across the five corporate plan priorities:

1. Enhancing Cheltenham's reputation as the cyber capital of the UK
2. Working with residents, communities and businesses to help make Cheltenham net zero by 2030
3. Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
4. Increasing the number of affordable homes through our £180m housing investment plan
5. Being a more modern, efficient and financially sustainable council

1.5. **Equality, Diversity and Inclusion Implications**

The Equality Impact Assessment (Screening) tool has been completed (See Appendix 2 of this report). There are no specific equality implications on the updated Local Development Scheme, as it only provides key milestones. Wider community and stakeholder engagement publicity will be worked up in more detail as the SLP progresses.

1.6. **Performance management – monitoring and review**

Managing the programme and risks associated with development plan preparation is active and managed by the SLP programme. Programme management is active and reported to the Senior Responsible Owner and managed through agreed programme arrangements. Strategic risks related to the programme are reported regularly via Leadership Team and quarterly to Cabinet and Audit Committee.

---

2. **Background**

2.1. Local Planning Authorities are required by law to prepare, publish, and maintain a Local Development Scheme (LDS) setting out the timetable for preparing statutory Development Plan Documents (DPD), which form the Local Plan.

2.2. The Council's current LDS was adopted in 2023 and at this time a commitment was made to prepare a [Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan](#) (SLP). Since this time the SLP team has made significant progress, including:

   i) A Regulation 18 'issues and options' consultation, held January - March 2024, which included significant engagement with communities and

stakeholders, including in person events in each of the main settlements, online events focussed on different topics, a strong online presence using bespoke engagement tools, a specific project to engage with young people and a Parish/Town Council event.

ii) Targeted 'call for sites', inviting the submission of sites for the councils to assess as potential development opportunities.

iii) Progression of in-house evidence relating to:

- Housing monitoring and employment monitoring,
- Assessment of site opportunities through the Housing and Economic Land Availability Assessment.
- Preparation of 'urban capacity studies' to ensure all possible development opportunities are identified within the built-up areas of Cheltenham, Gloucester and Tewkesbury,
- Analysis of density to ensure that the best use of potential sites, reflective of local character.

iv) Officers are currently undertaking a review of the Infrastructure Delivery Plan, to provide a fresh understanding of infrastructure necessary to support future development.

v) Commissioning of external studies necessary to support the plan is underway or within procurement preparation, including:

- Sustainable Transport Strategy
- Renewable Energy Study
- Housing and Economic Needs Assessment
- Green Belt Review
- Strategic Flood Risk Assessment and Water Cycle Study
- City/Town Centre Study.

Why do we need a new Local Development Scheme?

2.3. In December 2024, the Government made several announcements that have a direct impact in the preparation of development plans. The focus behind all these announcements is the Government's mission to deliver new homes and jobs under its 'Plan for Change'. These include:

i) A new National Planning Policy Framework (NPPF) (December 2024), where various key changes have been made, regarding matters such as the delivery of new homes and other development, the approach to be taken to Green Belt land, the introduction of the concept of 'Grey Belt', and cooperation with neighbouring councils and infrastructure bodies on cross-

boundary matters.

ii) A new ['Standard Method'](#), which provides the mandatory starting point for determining housing requirements through a council's local plan. For each SLP partner, the [figure has increased](#), with the greatest increase for Cheltenham Borough. The Standard Method is implemented immediately, and therefore impacts a councils' 5-year housing land supply.

iii) The publication of the [English Devolution White Paper](#), which sets out the Government's ambitions for local government reorganisation in two-tier areas, such as Gloucestershire, through the creation of new unitary authorities, and the devolution of certain functions to larger combined authorities. Whilst there is considerable uncertainty regarding what this means for Gloucestershire at present, it is clear there will be a limited timeframe within which the SLP can be prepared and submitted to the Secretary of State for public examination.

iv) It is understood that Councils will have until December 2026 (see [Consultation Outcome – Proposed reforms to the National Planning Policy Framework and other changes to the planning system - Updated 12 December 2024](#)) to submit a Plan for examination under the current legislative framework. After this, a Plan will need to be made within the provisions of the [Levelling Up and Regeneration Act 2023](#), with relevant provisions due to be brought into force in 2025.

2.4. At the same time as these announcements, the [Government's Chief Planner wrote to all councils](#) (see page 5 of that letter) asking that all local planning authorities produce an updated Local Development Scheme within 12 weeks of the publication of the NPPF, **by 6 March 2025**.

---

3. Reasons for recommendations

3.1. Following on from this, the SLP councils via the SLP Joint Advisory Group have discussed and reiterated their commitment to the benefits of continued joint working, to progress the SLP as a priority and as quickly as possible. With this in mind, the councils have reviewed the current timetable and propose this is consolidated and streamlined, alongside a more iterative and flexible approach to community and stakeholder engagement.

What does this mean in practice?

3.2. The SLP councils will put in place an iterative engagement plan feeding into the next formal stage of the SLP. The next formal stage would be 'Publication'

under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This would be the Plan that the councils intend to submit for examination, and the examination would start once the SLP has been submitted.

3.3. The currently approved LDS (2023) included formal publication consultations under the Regulation 18 stage of plan preparation. However, there is no formal requirement within the regulations for multiple rounds of public consultation and because this is a joint plan requiring agreement from all three councils, it is no longer considered practicable to undertake a further Regulation 18 formal publication consultation within the expectations set by Government. As set out earlier in this report, an issues and options consultation took place from January until March 2024, which involved significant engagement with our communities, stakeholders and the development industry.

3.4. However, the critical importance of continued and ongoing engagement with communities and stakeholders is fully acknowledged and it is therefore proposed that this is undertaken in an iterative and informal manner, as opposed to a single 'consultation event'. In practice this means providing the opportunity for engagement in key projects that support the plan, such as topic papers relating to specific issues and matters, such as urban capacity and options to support the role of our city and town centres.

3.5. This means that for the next statutory stage of the SLP, the SLP councils will be asked to approve the 'Pre-Submission' version of the plan, Regulation 19, before it is then published for consultation, and subsequently submitted to the Secretary of State for examination in public. Alongside the Plan, councils are required to submit a range of other documentation, including the Sustainability Appraisal, supporting evidence, a Consultation Statement and copies of any representations made to the Plan. In advance of this, there will be some community and stakeholder engagement around certain topics and Member engagement through the member working groups and Joint Advisory Group.

3.6. The proposed timetable is as follows:

Evidence gathering, plan-preparation and community and stakeholder engagement (Regulation 18)	February 2025 – April 2026
Council approvals for the Pre-Submission SLP (Regulation 19)	May – July 2026
Consultation on Pre-Submission Strategic and Local Plan (Regulation 19)	August - September 2026
Submission to the Secretary of State (Regulation 22)	October – November 2026

3.7. Following Submission, the Planning Inspector will take control of the examination process from start to finish, and importantly will determine the timetable for examination hearings and other matters.

3.8. The purpose of the LDS is to set out the Local Development Documents that are to be Development Plan Documents (DPDs) and which will be prepared by the council. The LDS also needs to give details as to what they will contain and timescales for their production. It is important that plans for the future of the Borough are produced in a timely and efficient manner. If they are not, development which is necessary for the Borough's continued growth and prosperity may be delayed or abandoned, the coordination of housing development and infrastructure provision may be difficult to achieve and there is the potential for development to be approved on appeal in locations that the authority does not consider suitable, and at significant cost.

3.9. Whilst the Development Plan can also comprise Neighbourhood Development Plans (NDP) that are 'made', NDPs are developed by local communities rather than being directly progressed by the Authority. As such, the LDS does not contain detail on the timescales for any emerging NDPs.

3.10. Supplementary Planning Documents (SPDs) do not undergo the same process as development plan documents (Local Plans) and there is no regulatory requirement to refer to SPDs in the LDS.

4. Alternative options considered

4.1. Because the LDS is a statutory requirement, there is no suitable alternative to its production.

4.2. An alternative option would be to maintain the LDS as drafted with refreshed dates to reflect the latest position regarding further formal publication Regulation 18 stages. However, this would take considerable time to complete and not be achievable within the timeframe for the plan to be considered under the current local plans system as required by Government.

5. Consultation and feedback

5.1. The LDS Scheme functions as a maintained timetable of the Authority's commitment to produce Development Plan Documents. Whilst there is no statutory requirement to consult on the LDS itself, any Development Plan Documents described within it are subject to various consultation requirements.

6. Key risks

6.1. As set out in Appendix 1, the risk set out can be avoided through having an up-to-date Local Development Scheme.

6.2. The preparation of the SLP within a limited timeframe will require significant resources. To provide for this, the partner councils each make an annual contribution to a joint funding pot to be used for shared officer resource and other costs such as external evidence studies, digital mapping software and the consultation portal. This agreement runs for three years and will need to be reviewed in due course. The authorities have appointed an SLP Manager to oversee the overall budget and programme and to work with senior leads from each partner council, should issues arise.

6.3. The SLP has a programme structure in place, and this includes the oversight of a Senior Responsible Owner (SRO) of the programme. This role is currently undertaken by the Chief Executive of Tewkesbury Borough Council. The SRO is supported by a Joint Advisory Group made up of the Chief Executives, Leaders and relevant portfolio leads for planning.

Report author:

Tracey Birkinshaw, Director of Communities and Economic Development, tracey.birkinshaw@cheltenham.gov.uk

John Spurling, Planning Policy Manager (Interim), john.spurling@cheltenham.gov.uk

Appendices:

i.   Risk Assessment
ii.   Equality Impact Assessment (Screening)
iii.   Local Development Scheme

Background information:

Cheltenham Corporate Plan (2023-2027)

Planning and Compulsory Purchase Act (as amended)

Government Guidance on Plan Making

National Planning Policy Framework (December 2024)

Consultation Outcome – Proposed reforms to the National Planning Policy Framework and other changes to the planning system - Updated 12 December 2024

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the Council does not have an up-to-date Local Development Scheme then it will not be performing part of its statutory duty	Director of Communities & Economic Development	3	1	3	Avoid the risk	Close	This risk will be mitigated by the Cabinet decision.	18 February 2025

Appendix 2: Equality Impact Assessment (Screening)

---

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: John Spurling	Service Area: Planning
Title: Planning Policy Manager (Interim)	Date of assessment: 3 February 2025
Signature: John Spurling	

b. Is this a policy, function, strategy, service change or project?

Other

If other, please specify: Project timetable

c. Name of the policy, function, strategy, service change or project

Local Development Scheme 2025

Is this new or existing?	Already exists and is being reviewed

Please specify reason for change or development of policy, function, strategy, service change or project

To ensure that the LDS reflects various changes as set out by the Government. All local planning authorities have been asked to produce an updated LDS within 12 weeks of the publication of the NPPF, by 6 March 2025.

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims:	To provide a revised approach to the timetable and engagement in relation to the production of the Strategic and Local Plan.
Objectives:	As above

Page 234

Outcomes:	Transparency in terms of the process, including meeting key milestones set out in the LDS.
Benefits:	As above

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	No
Do you expect the impacts to be positive or negative?	No impact expected
Please provide an explanation for your answer:	
The LDS only provides key milestones. Wider community and stakeholder engagement publicity will be worked up in more detail as the SLP progresses.	

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

f. Identify next steps as appropriate

Stage Two required	No

Local Development Scheme 2025-2028

Published on XX 2025

1.   Introduction

1.1   Cheltenham Borough Council has a statutory duty to maintain an up-to-date LDS[1]. This LDS sets out the Development Plan Documents (DPDs)[2] that will be prepared and the programme for their preparation. This LDS supersedes any previously published LDS.

---

[1] Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended)

[2] A document setting out the Council's planning policies and proposals. They are subject to community involvement, consultation and independent examination by an independent Planning Inspector

2   Proposed Development Plan Document (DPD)

2.1   Cheltenham Borough Council, in conjunction with Gloucester City Council and Tewkesbury Borough Council, are producing one DPD as can be seen in Figure 1.

Figure 1: Proposed Development Plan Document

The Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP) (producedby Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council)	
Role and subject / Geographical coverage	This will set out the development strategy; development requirements; policies (strategic and non-strategic) and site allocations for Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. *Strategic plan policies* - drafted jointly by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council with the support of Gloucestershire County Council Cheltenham *local plan policies* – drafted by Cheltenham Borough Council
When adopted, will supersede	i. Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (adopted December 2017); ii. Cheltenham Plan (adopted July 2020); and iii. Remaining, yet to be replaced 'saved' retail policies of the Cheltenham Borough Local Plan Second Review (adopted June 2006).
Timetable – Key Stage[3]	
Evidence gathering, plan-preparation and community and stakeholder engagement (Regulation 18)	February 2025 – April 2026
Council approvals for the Pre-Submission SLP (Regulation 19)	May – July 2026
Consultation on Pre-Submission Strategic and Local Plan (Regulation 19)	August - September 2026
Submission to the Secretary of State (Regulation 22)	October – November 2026
Stages below subject to Planning Inspector Programme	

---

[3] Regulation references taken from The Town and Country Planning (Local Planning) (England) Regulations 2012) as amended

Hearings (sometimes referred to as Examination in Public[4]) (Regulation 24) and Major Modifications Consultations (the latter if needed)	TBC
Inspector's final report sent to LPA (Regulation 25)	TBC
Adoption (Regulation 26)	TBC

3 Policies Map

3.1 The Policies Map spatially illustrates policies contained in DPDs on an Ordnance Survey base map. The Policies Map will be updated as the SLP is progressed. The Policies Map will show matters including:

    i.   designations, e.g. settlement boundaries; and

    ii.   site allocations, e.g. sites may be allocated for a variety of uses including housing.

4 Neighbourhood Plans

4.1 Neighbourhood Plans are prepared to timescales that are set by the qualifying body, such as a Parish Council and not by Cheltenham Borough Council. Therefore, the timetable for their preparation is not contained within this LDS. Following successful examination and referendum, Neighbourhood Plans become part of the statutory Development Plan.

4.2 For communities that may wish to develop their own Neighbourhood Plan, information can be found via Neighbourhood Plans.

---

[4] The examination begins when the Plan is submitted to the Planning Inspectorate and is completed when the final report is sent to the Local Planning Authorities.