

# Cheltenham Borough Council Cabinet

**Meeting date:** Tuesday, 10 June 2025

**Meeting time:** 6.00 pm

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

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## **Membership:**

Councillors Victoria Atherstone, Paul Baker, Flo Clucas, Mike Collins, Rowena Hay, Peter Jeffries, Alisha Lewis, Izaac Tailford and Richard Pineger

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## **SECTION 1 : PROCEDURAL MATTERS**

### **1 Apologies**

### **2 Declarations of interest**

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

### **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 AND/OR OFFICERS**

### **5 Housing Delivery Test Action Plan (Pages 13 - 36)**

Report of Cabinet Member for Planning and Building Control, Councillor Mike Collins

### **6 Petersfield Community and Sports Hub (Pages 37 - 64)**

Report of Cabinet Member for Finance and Assets, Councillor Peter Jeffries

## **SECTION 6 : BRIEFING SESSION**

- Leader and Cabinet Members

### **7 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**

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# Cheltenham Borough Council

## Cabinet

## Minutes

**Meeting date:** 20 May 2025

**Meeting time:** 6.00 pm - 6.45 pm

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**In attendance:**

**Councillors:**

Victoria Atherstone, Paul Baker, Flo Clucas, Mike Collins, Iain Dobie, Rowena Hay, Peter Jeffries, Alisha Lewis and Izaak Tailford

**Also in attendance:**

Gareth Edmundson (Chief Executive), Richard Gibson (Head of Communities, Wellbeing and Partnerships) and Victoria Bishop (Governance, Risk and Assurance Manager)

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### 1 Apologies

There were no apologies.

The Leader welcomed Councillor Baker to the Cabinet, as newly-appointed Cabinet Member for Waste, Recycling, Parks, Gardens and Public Greenspace.

### 2 Declarations of interest

There were no declarations of interest.

### 3 Minutes of the last meeting

The minutes of the meeting held on 08 April 2025 were approved with the following amendment:

#### **Agenda item 8: Briefings from Cabinet Members**

Paragraph 4, Briefing from Cabinet Member for Waste, Recycling and Public Realm

- he has spent four hours earlier today planting trees at ~~Boroughs~~ Burrows Field, together with the CBC greenspace team...

The Leader signed the minutes as a true record of the meeting.

#### **4 Public and Member Questions and Petitions**

There were no public or Member questions, and no petitions.

#### **5 Physical activity and sport strategy for Cheltenham - Action Plan**

The Leader invited the new Cabinet Member for Economic Development, Culture, Wellbeing and Public Open Space to introduce the report, which had been approved by his predecessor.

To present the report, the Cabinet Member for Economic Development, Culture, Wellbeing and Public Open Space read out the introduction of the report as published, which explained the background and recommendations.

He said the report received positive feedback at Overview and Scrutiny Committee on Monday night, with a lot of questions and comments. The focus on football and the question of supporting more sports raised; the Cabinet Member for Economic Development, Culture, Wellbeing and Public Open Space commented that this follows on from the recent Playing Pitch Strategy, and the benefits of drawing in outward investment from the Football Association and other levels, creating facilities that can be used for many sports and also taking football teams and matches off existing sites which were originally intended for other sports. Also discussed was what communications can be put out to encourage people in Cheltenham to get active, in addition to the current Youth Activity Pass.

He said the report was a good starting point for the action plan to move forward, encourage investment and external funding, and improve and develop our own facilities. It is important to support both the people who play and love team sports, and those who enjoy other activities such as cycling, running and walking, and to do all we can to make provision and facilities better for the people of Cheltenham.

Members all welcomed the excellent report and recommendations, thanking the Cabinet Member, his predecessor, and officers for their hard work, and made the following comments:

- anything we can do to improve and encourage sport and sporting facilities is to be encouraged, as involvement in sport has so many benefits for both physical and mental health;
- the focus on 3G pitches is welcome and a move in the right direction, although it is a sad indictment that there is currently only one artificial pitch available locally - the Cheltenham Tigers pitch, technically outside the borough. It is widely used by many clubs from all over Cheltenham when their grass pitches are not available, and has even been used by visiting national teams as a camping base during world cups in Europe;

- it would be good to highlight walking more in the next version of the strategy. The council has opened footpaths around at least two parks in recent years – Naunton Park and Burrows Field – and these are welcomed by residents and well used by walkers, power walkers and joggers. The council should continue to take walking seriously and to work with officers and the county council to improve the footpaths which criss-cross Cheltenham, including the reopening of Gustav Holst Way in Cheltenham parks, which has been closed for many years;
- walking is an important physical activity, which can be enjoyed by and encouraged for people who are not otherwise involved in sports. Our parks and greenspaces are unique, and many include outdoor gym facilities;
- the Feel Good Pass and Youth Activity Pass are an excellent way to involve people without the time or necessary funding to otherwise get involved, and a way of leveraging further investment to enhance what the town already offers;
- this report brings together a lot of earlier work, setting out what we need to do as a town going forward, with a clear action plan to encourage more funding opportunities and delivery of identified options to improve physical activity and sports, at the same time generating enhanced relationships with parish councils, schools, and other partners;
- further engagement with young people and the Youth Activity Pass will help break down one identified barrier of cost. It is concerning that being physically active can be a particular challenge for young females, and it would be interesting to know why this is and identify more community sports which encourage them to engage;
- this inspiring report highlights the benefits of sport on physical and mental health, not least by generating friendships and opportunities. The town is blessed with some great facilities, many of which are provided by the private sector, and it is important that we continue to work as we do with shared agreements with the private sector and schools, to make the most of these;
- we are also lucky to have some excellent clubs in the town, including Leckhampton Rovers, Charlton Rovers, Old Pats and Lakeside, which work hard and raise funds, involving many hundreds of young people, and the Cheltenham Youth Football League which involves thousands;
- on the subject of playing pitches, it is good news that Pittville School has planning permission for a 3G pitch and sports hall, and important that any new development such as Elms Park delivers this sort of facility, as well as walkways through new estates;
- in addition, Friends groups, such as Friends of Sandford Park, work hard, and have recently raised money for gym equipment, opening a whole new avenue of opportunities for all age groups; there is so much going on that people don't know about and the more we can do to promote this to a wider audience, the better.

The Cabinet Member for Economic Development, Culture, Wellbeing and Public Open Space thanked Members for their kind comments and contributions, and made the following points in response:

- the shortage of 3G pitches was noted in the playing pitch strategy, as these are a much-needed facility, and working with private organisations to secure

community use agreements is to be encouraged. It is good to note that permission has been granted for Pittville School's facility;

- more focus on walking is noted – it is a valued part of people's lives, and easy to take for granted the lovely parks, gardens and greenspaces we have in Cheltenham. CBC has recently been awarded UK Shared Prosperity Fund grant for more paths, and the more external funding we can generate for projects the better. Friends groups and communities can work with the council to help make things happen and secure funding for projects that the council cannot do on its own.

### **RESOLVED THAT:**

- 1. the physical activity and sports action plan, attached as Appendix 2, is endorsed;**
- 2. authority is delegated to the Director for Community and Economic Development, in consultation with the Cabinet Member for Economic Development, Culture, Wellbeing and Public Open Space, to make any final amendments to the action plan as it is presented in its final designed format;**
- 3. the action plan will be used to establish a sports and physical activity steering group that will oversee the progress of the action plan identifying where partners can work collaboratively to support delivery.**

### **6 Briefings from Cabinet Members**

The Leader invited Members to share any briefings. Some had only been in position in their new portfolios for eight days, but briefings were as follows:

The Cabinet Member for Planning and Building Control reported that he has recently signed off the Cheltenham Non-residential Monitoring Report for 2024-25, covering all non-residential permissions in that period, which was interesting reading. He also advised that:

- work has started on the draft Housing Delivery Test Action Plan, which shows the current situation with regard to the council's five-year land supply. The report will help to monitor progress more closely than in the past, and hopefully with Elms Park, Golden Valley and other strategic developments coming forward, CBC will get much closer to achieving its supply;
- the Director of Community and Economic Development has signed off a decision authorising a financial contribution from SAMM (Strategic Access Management and Monitoring) to Stroud District Council to facilitate an onsite ranger service at Cotswolds Beechwoods for the next two years.

The Cabinet Member for Major Developments and Housing Delivery said she was happy to have met with the excellent team, who shared their ambitious ideas for Golden Valley, a huge part of her portfolio. High Street regeneration and housing delivery are also major items, and it is great to hear that the Monkscroft



development, which had hit a snag due to economic factors, is now back on the agenda, with 100% affordable housing, mix of tenures to actively reflect the shortcomings on the housing waiting list, very high climate standards, and easy walking paths.

She also reported on the promotion over the last few weeks of the Jam Coding project, with the Golden Valley team putting money into coding passes for children in local primary schools to have fun and develop skills for careers not only in the Golden Valley but also in the wider tech eco-system. Her predecessor worked hard on the social value that Golden Valley gives back to the community, and this is the tip of the iceberg.

The Cabinet Member for Economic Development, Culture, Wellbeing and Public Open Space was also getting to grips with his new portfolio, with meetings already taken place and many more planned. He is enjoying meeting leaders and organisations which contribute so much to our festival town, its culture and wellbeing, and all the very positive things that make Cheltenham the wonderful place it is, where people want to live and to invest.

One of these, he said, is the Cheltenham Lido which is celebrating 90 years on Sunday. It is a fantastic facility, supported by the council over the years, and a great asset to the town.

The Cabinet Member for Climate Emergency, having recently been elected to Gloucestershire County Council, said he was looking forward to bringing the county and the borough together on issues such as footpaths, and playing a role in liaison between the two councils to ensure that what they do is as effective as possible for the people of Cheltenham.

The Leader thanked the Cabinet Member for Climate Emergency for his much-valued contribution to Cabinet, and wished him well on the County Council.

The Cabinet Member for Housing and Customer Services said she had been privileged to represent the Local Government Association at a number of meetings in Europe over the last few weeks, where she was able to share what CBC is doing. In particular, she spoke about how the council is supporting girls and women, after reports that they are retreating from many aspects of life because they don't feel safe. She thanked, Richard Gibson, Kelly Patterson and Tracy Brown for all their work, and said what a great honour it was to be able to represent Cheltenham, talk about what we do, and show the difference it makes.

The Cabinet Member for Safety and Communities shared several items:

- thanks and congratulations to licensing officers and all partners who work with us on being awarded a 10<sup>th</sup> consecutive purple flag, assessed on the town's offering for the evening and night-time economy – this is a great achievement;
- she was happy to have volunteered at the weekend's Pride Festival, and to engage with the community, vendors and the police about hate crime and safety in our communities;
- she was also pleased to have met and talked some visitors from Cheltenham's twin towns, Annecy and Gottingen, here for the Jazz Festival, and given a

presentation and update on the work of No Child Left Behind, with ongoing dialogue;

- she has been working with officers to digest the consultation responses to the recently-updated sexual entertainment venue licensing policy and taxi policy, and thanked everyone who took time to respond to those important consultations.

The Cabinet Member for Finance and Assets was happy to return to this portfolio and thanked his predecessor for all her work. He said that finances are hit by global economic forces from time to time, and recent events are likely to have an impact on CBC. He added that there is always a lot going on with the council's properties, welcomed the upcoming report on the Petersfield Partnership, and he was looking forward to being involved going forward.

The newly-appointed Cabinet Member for Waste, Recycling, Parks, Gardens and Public Greenspace said he had learnt a lot in his first week, and was impressed by the first-class officers he has met, whose experience and longevity says a lot about the organisation. He share the following news items:

- the Long Gardens will soon be planted up with perennials, which will transform their appearance;
- he has recently met with Adam Reynolds, Parks and Public Realm Manager, to discuss issues of security around parks, open spaces and recreation grounds;
- new and more bins are being installed on the Promenade and High Street, which will hopefully be well used.

The Leader said that she has received feedback from the government, following submission of CBC's proposals on local government reorganisation in Gloucestershire. This doesn't add anything new, mainly reiterating the original document. She commented that the county council elections have taken place since the original submission, highlighting the importance of working across all seven authorities. She is looking forward to working with the new county administration.

### **7 Cabinet Member decisions since the last meeting**

The Leader briefly described four Cabinet Member decisions taken since the last meeting of Cabinet:

**08 April 2025:** Cabinet Member for Economic Development, Wellbeing and Culture

[Approval of the award of grant funding for the Cheltenham Health and Wellbeing grants 2024](#)

**10 April 2025:** Leader, Councillor Rowena Hay

[To allocate the UK Shared Prosperity Fund \(UKSPF\) for 2025-26](#)

**17 April 2025:** Leader, Councillor Rowena Hay

[Cotswold National Landscape Management Plan 2025-30](#)

**17 April 2025:** Cabinet Member for Economic Development, Wellbeing and Culture

Cheltenham Feel Good Pass

**8 Any other item(s) that the Leader determines to be urgent and requires a decision**

There was none.

**9 Date of next meeting**

The next meeting is scheduled for Tuesday 10 June.

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## Cheltenham Borough Council

### Cabinet – 10 June 2025

## Housing Delivery Test Action Plan 2025

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**Accountable member:**

Councillor Mike Collins – Cabinet Member for Planning and Building Control

**Accountable officer:**

Daniel O'Neill, Senior Planning Policy Officer

**Ward(s) affected:**

All

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**Key Decision:** No

**Executive summary:**

Cheltenham is an enabling council and recognises the role it plays in meeting the growth needs for our area. The Council is positive and proactive in its response working collaboratively and innovatively with its partners Tewkesbury Borough and Gloucester City Council to plan strategically for its housing needs. The provisions for this set out in the [Gloucester, Cheltenham and Tewkesbury Joint Core Strategy](#)(JCS).

Since 2019 the Government has published Housing Delivery Test results – this is an annual measurement of housing delivery over a rolling 3-year period. The Government has set a high bar and to pass the test local planning authorities must meet 95% and above of its housing requirement. Where a local planning authority falls under the 95% bar the Government has put consequences in place.

We undertake regular assessment of our housing land supply. Cheltenham's supply is a challenging one as around 50% of our housing supply is planned for delivery by the JCS strategic allocations at Northwest and West Cheltenham. This means we

have a heavy reliance on the delivery of the JCS strategic allocations to meet our needs. The impact of this means that for the last Housing Delivery Test results, Cheltenham, like many other councils across England are in a position of not meeting the 95% test. For the latest period Cheltenham is 65%.

This report sets out the positive steps Cheltenham is making to assess the causes of under delivery and to identify actions to boost housing delivery via an action plan.

**Recommendations: That Cabinet:**

- 1. approves the prepared Housing Delivery Test Action Plan, June 2025 for publication;**
- 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 Housing Delivery Test Action Plan (HDTAP) for publication correcting any minor errors;**
- 3. delegates any future updates to the HDTAP to the Director of Community and Economic Development, in consultation with the Cabinet Member for Planning and Building Control.**

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**1. Implications**

**1.1 Financial, Property and Asset implications**

No financial, property and asset implication arising from this report.

**Signed off by:** Ela Jankowska – Finance Business Partner      **Date:** 16.05.2025

**1.2 Legal implications**

Paragraph 79 of the National Planning Policy Framework (December 2024) requires local planning authorities to monitor progress in building out sites that have planning permission, and where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance to assess the causes of under delivery and identify actions to increase delivery in future years. The Council is therefore required to produce an action plan. The Housing Delivery Test Action Plan meets the requirements of Paragraph 79c of the National Planning Policy Framework (December 2024).

**Signed off by:** Charlotte Lockwood, Locum Senior Lawyer, One Legal  
[Charlotte.Lockwood@onelegal.org.uk](mailto:Charlotte.Lockwood@onelegal.org.uk)

### 1.3 Environmental and climate change implications

The delivery of new housing will require applications for planning permissions to be submitted to the Council for determination. The requirements in the Local Validation List for planning applications include metrics from the Cheltenham Climate Change SPD, which provides guidance on how applicants can successfully integrate a best-practice approach towards climate and biodiversity in their development proposals. Hence the planning process in regard to housing delivery ensures environmental and climate change impacts are considered, aiming to encourage building to net zero carbon standards. For this reason, a Climate Impact Assessment is not required.

**Signed off by:** Maizy McCann, Climate Officer, [Maizy.McCann@cheltenham.gov.uk](mailto: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

There are no expected impacts on the lives of people, including employees and customers. The Housing Delivery Test Action Plan focus is only on the intervention options open to the Council to improve the supply of housing. For a full Equality Impact Assessment (Screening) see Appendix 2.

### 1.6 Performance management – monitoring and review

The Housing Delivery Test measurement is published annually by government. The Housing Delivery Test Action Plan will be reviewed annually, until housing completions reach 95% of the housing requirement.

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## 2 Background

2.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery against the Local Planning Authorities (LPAs) housing requirement based on the preceding three financial years. It is calculated using the Governments' [rule book](#) and the results are published each year. The detail of this is set out in Appendix 3 (see section 2).

2.2 The most recent HDT results was published [in December 2024](#), and it gave the Council a result of 65% delivery against its defined level of housing requirement covering the period from 1 April 2020 to 31 March 2023. Since the percentage

achieved is less than 95% there is a requirement for the Council to prepare a Housing Delivery Test Action Plan (HDTAP). Cheltenham is not alone and ensuring an adequate supply of land for housebuilding remains a key issue for many local planning authorities in England. Around 35% of local planning authorities failed to meet the HDT.

2.3 Housing delivery for Cheltenham to meet this test is a significant challenge as the strategic allocations as allocated by the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) is approximately 50% provided for by these sites. These sites are now coming forward for determination, but until the schemes have a successful planning consent, these do not contribute to meeting Cheltenham's 5-year housing land supply. There have been many challenges affecting the trajectory of the delivery of the strategic allocations some of which are not uncommon with large strategic sites, but some are site specific to Cheltenham and over which the Local Planning Authority relies on others to seek resolution:

- M5 Junction 10 – working planning applications alongside Development Consent Order (DCO) process; a process that has been significantly impacted by the delays triggered by the Covid 19 pandemic and having knock on impacts across the strategic allocations and other major sites
- Complex site issues e.g. High-pressure gas main (Northwest Cheltenham) and finding appropriate resolutions to the satisfaction of the relevant statutory agencies
- Resolving technical issues e.g. access, highways, infrastructure, environmental and landscape
- Finding solutions to the Cotswolds Beechwoods – Suitable Alternative Natural Green Space (SANG)
- Resolving statutory consultee and wider stakeholder issues/objections
- Viability challenges
- Consultation and re-consultation activities.

2.4 The Council are committed to the delivery of new housing in the borough and the HDTAP will focus on the intervention options open to the Council. Whilst it is noted that a number of actions identified are principally in the remit of the Council to undertake, it recognises that support and co-operation are needed from those involved in delivering new homes. Cheltenham has a positive and proactive relationship with developers, agents and stakeholders and is confident that the HDTAP will be effective. This is demonstrated in the recent positive consent granted subject to S106 Agreement by both Cheltenham and Tewkesbury Local Planning Authorities on 29<sup>th</sup> May 2025 for 4,115 new Homes at Elms Park, Northwest Cheltenham and the scheduling of key sites in the West Cheltenham strategic allocation being programmed for determination by planning committee summer/autumn 2025.



### **3 Reasons for recommendations**

3.1 In 2018, Central Government introduced the HDT as a mechanism to measure delivery against a LPA's housing requirement and the requirement for an action plan if fell below this requirement. It is the first occurrence where the housing delivery in the borough has fallen below 95% of its housing requirement over the previous three year and therefore this is the first HDTAP that the Council has needed to produce.

3.2 The Planning Practice Guidance (PPG) Housing supply and delivery stipulates that HDTAP's should *"identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to improve levels of delivery"* (Paragraph 039 Reference ID: 68-047-20190722). It also includes what an LPA can review, consider and publish within an action plan.

3.3 This HDTAP has been prepared in accordance with the advice set out in the PPG and the structure of the action plan is set out below;

- The Councils HDT result;
- Issues relating to housing delivery;
- Key actions and responses;
- Monitoring and future review.

3.4

### **4 Alternative options considered**

4.1 Because the HDTAP is a requirement triggered by paragraph 79c of the NPPF, there is no suitable alternative to its production.

### **5 Consultation and feedback**

5.1 There is no statutory requirement for consultation.

### **6 Key risks**

6.1 As set out in Appendix 1, the risk can be avoided through publishing this Housing Delivery Test Action Plan

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#### **Report author:**

Daniel O'Neill, Senior Planning Policy Officer

**Appendices:**

- i. Risk Assessment
- ii. Equality Impact Assessment (Screening)
- iii. Housing Delivery Test Action Plan 2025

**Background information:**

[Cheltenham Corporate Plan \(2023 – 2027\)](#)

[National Planning Policy Framework \(December 2024\)](#)

[Housing Delivery Test: 2023 measurement](#)

[Housing Delivery Test: 2023 measurement technical note](#)

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 prepare and publish a HDTAP then it will not be fulfilling the requirements set out by paragraph 79 of NPPF	Director of Communities & Economic Development	3	1	3	Avoid the risk	Close	The risk will be mitigated by the Cabinet decision	10 June 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:
Signature: John Spurling	

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

Strategy

If other, please specify:

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

Housing Delivery Test Action Plan

Is this new or existing?

New or proposed

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

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

Aims: To outline issues relating to the delivery of new homes within Cheltenham borough and actions intended to improve housing delivery

Objectives: To improve the Councils housing delivery rate and Housing Delivery Test measurement

Outcomes:	To avoid having to prepare a future Action Plan
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 Housing Delivery Test Action Plan focus is only on intervention options open to the Council to improve the supply of housing, a statutory function for the Council

**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	<b>No</b>
Owner of Stage Two assessment	<b>N/A</b>
Completion date for Stage Two	<b>N/A</b>

assessment

**Please move on to Stage 2 if required ([intranet link](#))**



# **Housing Delivery Test Action Plan 2025**

Published  
**XX 2025**

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## 1. Introduction

- 1.1. In 2018, the Government introduced the 'Housing Delivery Test' (HDT) as a mechanism to measure delivery against a local planning authorities (LPAs) housing requirement. The HDT, published annually, provides a measure based on the preceding three financial years.
- 1.2. During December 2024, a number of changes were made to the planning system which had implications for Cheltenham Borough Council's ("the Council") housing land supply. This included the following.
  - publication of the new [National Planning Policy Framework \(NPPF\)](#);
  - the introduction of the new published standard method for calculating housing numbers; and
  - the publication of the latest HDT results
- 1.3. The production of this Housing Delivery Test Action Plan (HDTAP) is a direct result of the HDT result that was published on 12 December 2024. In addition, the changes above meant that the Council's 5-year housing land supply position reduced from 4.58 years' worth of housing to 2.52 years. The five-year housing land supply position will be updated in 2025.
- 1.4. The scope of this HDTAP will include a detailed summary of the latest HDT result and its implications; an analysis of the main issues relating to the delivery of new homes in the borough; a breakdown of the actions the Council intend to consider improving the delivery of housing, and future monitoring and review of the HDTAP where necessary.
- 1.5. This HDTAP has been prepared taking into account the national Planning Practice Guidance (PPG) and will focus on the intervention options open to The Council. Whilst it is noted that a number of the actions identified in the HDTAP are principally within the remit of the Council to undertake, it recognises that support and co-operation are needed from those involved in delivering new homes.

This Housing Delivery Test Action Plan is **not** planning policy. Instead, it acknowledges the current housing land supply shortfall and is a statement setting out the actions the Council will take to support housing delivery and restore a five-year housing land supply. This includes:

1. Outlining the issues relating to the delivery of new homes within Cheltenham borough; and
2. Describing the actions and key responses undertaken across the Development Management and Planning Policy teams

## 2. The Housing Delivery Test (HDT)

2.1. The results of the HDT have implications for LPAs. Paragraph 79 of the National Planning Policy Framework (December 2024) states where the HDT measurement indicates... *“that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences should apply:*

*a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;*

*b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;*

*c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.”*

2.2. The results of the latest HDT measurement for the Council were published by the government on 12 December 2024. Table 1 below shows that Cheltenham’s delivery of housing over the three-year period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2023 was at **65%** below its housing requirement.

*Table 1: Housing Delivery Test results 2024*

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2023 measurement	Housing Delivery Test: 2023 consequence
2020-21	2021-22	2022-23		2020-21	2021-22	2022-23			
267	412	496	1174*	372	114	273	759	65%	Presumption

\*Figure is the Government published result, and the assumption is that the difference in the total is due to rounding.

2.3. The consequence of the latest HDT result is paragraph 79c of the NPPF is now triggered. As a result, there is a requirement to prepare a housing action plan and to include a 20% buffer to the Council’s annual housing requirement in its five-year housing land supply. The presumption in favour of sustainable development had already applied before the latest HDT results on the basis that the Council could not demonstrate a 5-year year supply of housing as of 31 March 2024.

2.4. Following the publication of the new NPPF (December 2024), along with the related changes to ‘Standard Method’ calculation in the Planning Practice Guidance (PPG), as well as the latest HDT results, Cheltenham Borough’s five-year housing land supply figure is now **2.52 years**. There are clear reasons for the current five-year housing land supply position, these are

summarised in section 3 below.

- 2.5. The consequence of this all is set out in paragraph 11 of the NPPF. This states that for decision-taking, the presumption in favour of sustainable development will apply “*where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:*
- i. *The application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
  - ii. *Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.*
- 2.6. This does not alter the fact that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise<sup>1</sup>. In this context, the Development Plan for Cheltenham Borough comprises the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (the JCS, adopted December 2017)<sup>2</sup>, the Cheltenham Plan (adopted July 2020)<sup>3</sup> and remaining, yet to be replaced ‘saved’ retail policies of the Cheltenham Plan Local Plan Second Review (adopted June 2006)<sup>4</sup>.
- 2.7. Accordingly, in applying the paragraph 11d of the NPPF (the so-called tilted balance) to proposals that conflict with the Development Plan as a whole, relevant local planning policies will be used together with the NPPF as the basis to judge the degree to which any adverse impacts resulting from the development would outweigh the benefits.
- 2.8. Although the production of this HDTAP is a consequence of the latest HDT results, the Council nevertheless recognise the pressing need to re-establish a satisfactory housing supply position. This action plan will identify the reasons for under-delivery, explore measures the Council will undertake to reduce the risk of further under-delivery and how it intends to improve levels of delivery.

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<sup>1</sup> [Section 38\(6\) of the Planning and Compulsory Purchase Act 2004 \(as amended\)](#)

<sup>2</sup> [Joint Core Strategy 2011-2031](#)

<sup>3</sup> [Cheltenham Plan 2020](#)

<sup>4</sup> Including saved policy GE1 Public Green Space

### 3. Issues Relating to Housing Delivery

#### Local Plan Status and Housing Requirements

- 3.1. The three authorities of Cheltenham Borough, Gloucester City and Tewkesbury Borough jointly prepared the Joint Core Strategy (JCS) as part of the development plan for the area. The JCS was adopted in December 2017. The JCS is the strategic-level plan and sets out, amongst other aspects, the identified need for housing and economic growth as well as the spatial strategy it seeks to deliver.
- 3.2. The JCS became 5 years old on 11 December 2022. Paragraph 78 of the NPPF sets out that where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to require updating), local planning authorities should calculate their supply of deliverable sites against their local housing need as calculated using the standard method.
- 3.3. Cheltenham, Gloucester and Tewkesbury continue to work together and will be replacing the housing policy of the JCS through the preparation of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). The timetable and key milestones for the preparation of the SLP are set out in the approved [Local Development Scheme](#). Further detail on this is set out in Section 4 of this report.

#### Planning Designations – Green Belt

- 3.4. The Gloucester and Cheltenham Green Belt was designated in 1968 and extended in 1981. The extent of this Green Belt designation covers much of the Borough to its northern boundary, in order to protect the gap between Cheltenham and Bishops Cleeve, and to its western and southern boundary to prevent Cheltenham and Gloucester from merging. Following the adoption of the JCS in 2017, the Green Belt boundary was altered to accommodate the strategic allocations A4 (North-West Cheltenham) and A7 (West Cheltenham), which have yet to receive an approved outline permission.
- 3.5. As set out in paragraph 145 of the NPPF, “*Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans*”. The NPPF clearly states at paragraph 148 that where it is necessary to release Green Belt land then priority should be given first to previously developed land, then to consider grey land which is not previously developed, then other locations within the Green Belt designation.

#### Planning Designations – National Landscape

- 3.6. The Cotswold National Landscape was designated as an Area of Outstanding Natural Beauty in 1966. It extends to the east of Cheltenham’s urban area. Similar to the Green Belt designation, the National Landscape acts as a barrier to significant levels of housing development.
- 3.7. Paragraph 190 of the NPPF states that applications for development within a National Landscape should be refused for major development, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. It is clear that the NPPF places great weight to conserving and enhancing landscape and scenic beauty to a National Landscape, where the scale and extent of the development should be limited.

## Delivery of Site Allocations

- 3.8. North-West Cheltenham (Policy A4) and West Cheltenham (JCS Policy A7) have been allocated in the adopted JCS for housing development, schemes are being progressed to decision making over 2025 as summarised in the table below.

*Table 2: Strategic Allocations Details*

<u>Application No.</u>	<u>Proposal</u>	<u>Timeline to Planning Committee</u>
<b><u>North West Cheltenham</u></b>		
16/02000/OUT	Bloor & Persimmon Homes - Outline for up to 4115 new homes and up to 200 elderly persons accommodation. 24 ha of employment generating uses including 10 ha B1 business park (40,000sqm), hotel (up to 200 rooms) and mixed centres providing retail uses (up to 6,150 sqm) and community uses (up to 3,000 sqm). Transport hub, public transport interchange, primary and secondary school education, green infrastructure, play sports hub, woodland planting, allotments and habitat creation. New means of access on Tewkesbury Road and manor Road, footways, cycle ways and energy and drainage infrastructure.	Planning Committee 29 <sup>th</sup> May 2025. Decision – permit subject to S106
23/00354/OUT	Metacre Ltd (development arm of Northern Trust) – Outline for up to 165 new homes, including provision of vehicular access, green infrastructure and associated works. Appearance, landscaping, layout and scale are matters reserved.	TBC
<b><u>West Cheltenham</u></b>		
23/01875/OUT	HBD – Outline planning permission (with all matters reserved except for access) 576 new homes and up to 125,698 sqm of employment floorspace (southern parcel)	<u>Planning Committee 4<sup>th</sup> July 2025</u>
23/01874/OUT	HBD - Outline planning permission (with all matters reserved except for access) for 491 homes and up to 500sqm of flexible non-	<u>TBC</u>

	residential uses (northern parcel)	
22/01817/OUT	St Modwens - Outline planning application for 1100 residential development comprising a mixture of market and affordable housing	<u>TBC</u>
24/01268/OUT	Nema Golden Valley Ltd – Outline planning permission (with all matters reserved) for 365 homes and commercial uses, healthcare centre, community uses.	<u>TBC</u>

- 3.9. The Cheltenham Plan was adopted in 2020 and allocated sites for housing in accordance with the spatial strategy set out in the JCS. Policy H1 allocated land for housing development. There are nine allocated housing sites as set out within policies HD1-HD9. Policy H2 allocated land for mixed-use development. Three of these (MD1, MD3 and MD4) have elements of residential. Four sites allocated under policy H1 and one site allocated under policy H2 have been granted planning permission since the adoption of the Cheltenham Plan. Only 102, out of a planned 923 dwellings, have been built since permission was given. However, several of these sites have begun commencement and they feature within the Council’s latest 5-year housing land supply position statement.

## Delivery of Large Sites

- 3.10. As set out in the [Council’s five year housing land supply position statement](#), research from Lichfield’s<sup>5</sup> shows that larger sites take longer to get planning permission and also from the time of gaining planning permission to the completion of the first dwelling. Larger sites are often built out more slowly than anticipated. This is partly due to the amount of infrastructure that is required to support such development. It is recognised that providing infrastructure up front does de-risk sites and speed up delivery, but it is not commonplace because of the upfront cost of doing so. The Council has been proactive and in active engagement across all the strategic allocations, however the strategic allocations which make up xx% of Cheltenham’s housing land supply have not delivered against the housing supply trajectory as envisaged by the JCS.

## Impacts on Existing Infrastructure and Services

- 3.11. Major development can have an impact on existing infrastructure and public services, which can slow delivery and negatively impact on local service capacity where challenges exist to increase capacity.

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<sup>5</sup> [Lichfield’s: Start to Finish, Third Edition \(March 2024\)](#)

## 4. Key Actions and Responses

- 4.1. The Council has outlined a number of possible key actions to proactively encourage and boost the delivery of new homes across the Borough. The HDTAP highlights the importance of understanding the barriers to the delivery of homes and consideration of what measures can be put in place to address the issue.

### Preparing a new Development Plan

- 4.2. The Council are currently preparing and committed to the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP). It will contain both strategic and non-strategic policies and replace the JCS in its entirety and all district local plans that the three councils have adopted.
- 4.3. The Local Development Scheme (LDS) was adopted by all three councils in February 2025 and confirms the intention of the three authorities to submit draft plan to the Secretary of State (Regulation 22) by December 2026<sup>6</sup>.
- 4.4. The Council, together with Gloucester City Council and Tewkesbury Borough Council, have reiterated their committed to the benefits of continued joint working and to progress the SLP as a priority and as quickly as possible. The SLP will set the new housing requirement and allocate sites to seek to ensure that the three LPAs can deliver against the housing requirement and the HDT in the future.

### Self-Build and Custom Housebuilding Register

- 4.5. Under the Self-Build and Custom Housebuilding Act 2015 (as amended), the Council are required to keep, and have regard to, a register of people who have expressed an interest in self-build/custom build projects. The Council has established a self-build and custom housebuilding register to help support both affordable and market housing, and to record the interest of those looking to build their own home in the Borough. This process is ongoing, and the Council have recently amended their Local Connection Test to further strengthen the commitment to self-build/custom built housing.
- 4.6. The Act, based on evidence of demand from the register, also require the Council to put in place policies to support the delivery of planning permissions to meet the demand of self-build and custom build plots. In preparation of the SLP, the Council will consider whether to seek a percentage of self-build and custom-house built plots on major application schemes.

### Housing and Economic Land Availability Assessment

- 4.7. The purpose of the Housing and Economic Land Availability Assessment (HELAA) is to assist in identifying suitable land which available for housing and economic development to meet an identified need; to consider the development potential and when development is likely to occur.

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<sup>6</sup> [Cheltenham Borough Local Development Scheme 2025-2028](#)

- 4.8. The SLP authorities undertook a 'Call for Sites' through the Regulation 18 'Issues and Options' consultation, which ran for eight weeks from 16 January until 13 March 2024. The Council continues to accept new HELAA sites for assessment as part of the preparation for the SLP.
- 4.9. The process will allow the Council to attain the latest evidence from landowners/developers on existing sites and provides an opportunity for new sites to come forward. This approach should help to ensure that the Council has the widest choice of housing sites to choose from, which will pass through the site assessment process to fit with the emerging strategy for the SLP. The Council is currently in the process of preparing the next iteration of the HELAA together with an updated methodology for assessing sites.

### Urban Capacity Study

- 4.10. An Urban Capacity Study (UCS) is currently being prepared by the Council, in conjunction with the other SLP councils, to help assess realistic and potential urban housing capacity in the Borough. Its intention is to consider urban opportunities that contribute towards the development needs and growth over the SLP period.
- 4.11. The NPPF places great emphasis on the efficient use of urban land. It is a key component of sustainable development and an important priority for local people when faced with the potential loss of greenfield land. The purpose of the UCS is to provide evidence to help reduce the need for development on land beyond built up areas as far as is feasible / available.
- 4.12. For the Council, the aim of the UCS is that it will provide the data to evidence that all urban development potential within the Borough, in its many forms, has been considered and realistic and potential capacity highlighted.

### Optimising Site Densities

- 4.13. The draft HELAA methodology, consulted on as part of the Regulation 18 consultation, currently applies 40 dwellings per hectare (dph) for sites within the main built-up area and 30 dph for areas outside of this when assessing potential site allocations. It is acknowledged how these density assumptions are lower than most other authorities and significantly lower than the suggested density types for different areas in the [National Model Design Code](#) (2021).
- 4.14. To meet the Council's housing targets and improve the level of delivery it is crucial to ensure that land is used efficiently, and the number of homes delivered on site allocations are maximised. Therefore, the three SLP authorities are currently gathering data to review the current assumptions used within the HELAA in order to support optimising the site densities within the area to align with the National Model Design Code.

### Engaging with Agents/Developers

- 4.15. The Council will maintain ongoing dialogue with site promoters, developers and landowners of major sites with planning permission and the two strategic site allocations to understand what progress is being made. This information will help provide a forecasted trajectory of housing delivery for each year.



- 4.16. The Council will continue to hold a working group between the Head of Planning and planning agents, in order to support the effective determination of planning applications. The continued dialogue will provide updates on the Councils officer resource and allow agents to raise questions regarding ongoing issues.

### Pre-application advice

- 4.17. In October 2022, the Council updated their pre-application process acknowledging that early engagement has significant potential to improve the efficiency and improve outcomes of the planning applications. The Council offer a range of [pre-application services](#), providing advice and information on new residential development. The pre-application service offers guidance on minor and major housing schemes, with applicants given the opportunity to seek a written response following a meeting or site visit (if applicable).
- 4.18. Agents will be provided with feedback from Officers on the development proposal including, where relevant, thoughts from specialist disciplines; advice on any improvements to the scheme; commentary on relevant policies, and further guidance in relation to necessary documentation.
- 4.19. The aim of positive pre-application advice is that it can often result in the quicker determination of a formal planning application, as well as increasing the likelihood of the application being approved. The Council will continue to proactively encourage land promoters, developers and planning agents to seek pre-application advice.

### Planning Performance Agreements

- 4.20. In instances where development is particularly complex, the Council offers [planning performance agreements \(PPAs\)](#), the aim of which is to improve the quality of planning applications and the decision-making process. The use of PPAs will give developers and applicants a clear understanding of the resource the Council will invest and agree key milestones and timelines that all parties will work within. PPAs can offer a greater level of clarity, certainty and confidence.
- 4.21. The Council has experience of undertaking development proposals by early engagement through PPAs. Whilst these agreements are not a mandatory feature, the Council encourages early conversation with the Development Management Team and will continue to advocate for the use of PPAs with developers and applicants on major development or complex proposals.
- 4.22. Unilateral Undertaking & Section 106
- 4.23. New housing development in the Cheltenham borough has the potential to affect the protected Cotswold Beechwoods Special Area of Conservation (SAC), an area designated for its important biodiversity. The Council has a legal duty to assess the impact of planning applications on the SAC and mitigate recreational pressure as more houses are built.
- 4.24. In order to offset the environmental impact of new housing development, a financial contribution will be required to help pay for mitigation measures for the SAC. The Council has prepared [Unilateral Undertaking Section 106 forms available on the website](#) for applicants and developers to submit through the course of their application. This is the simplest way to make a

financial contribution and avoids the submission of 'shadow' Habitats Regulations Assessment of the impact on the SAC which may cause timely delay. The Council will continue to monitor the effectiveness of this process and update where necessary to avoid delays in the determination of application for new housing.

### Local Validation List

- 4.25. The Council has recently adopted and published a new local validation list in February 2025<sup>7</sup>. The previous local validation list was for the most part historic and considered not legally binding on an applicant. It is considered that a local validation list is an important tool to ensure that the Council has all the key documents and supporting information required upfront by an applicant before a planning application is made valid. The updated local validation list will likely significantly reduce delays to the determination of a planning applications and reduce the delays to the implementation of a development post approval.
- 4.26. Paragraph 45 of the NPPF highlights that the requirements set out in a local validation list "should be reviewed at least every 2 years" from the date of publication. A consequence of a local validation list exceeding two years since publication is that it ceases to have a legal effect. This is a highly undesirable way forward which will ultimately compromise the Council's decision-taking ability as well as its timeliness. The Council will therefore seek to review the local validation list no later than 1 January 2027.

### Staff Resourcing

- 4.27. The Council recognises the importance of its planning service in enabling and supporting timely decision-making. It is committed to ensuring the delivery of an efficient and effective service. This was recognised in the 2025/26 budget with additional funding targeted at the resourcing the planning team. In the last year the Council has successfully recruited additional Officer resource in both the Planning Policy and Development Management teams to help plan making and decision taking within the authority.
- 4.28. To continue the ongoing improvement to the planning process, the Council has recently recruited an Infrastructure Manager and at the time of writing are recruiting for a Principal Planning Officer to help deliver strategic sites and address any issues or barriers raised by developers, landowners and residents. This will be especially needed once the SLP is adopted as new sites for housing will be identified.
- 4.29. Additionally, the Council are growing the planning team through the recruitment of a principal urban designer, monitoring and validation officers and enforcement and compliance officer. These roles will help play a role in the integrity and efficiency of the Councils development management process and support wider planning outcomes across housing, sustainability and community growth.

### Commencement Condition

- 4.30. Under [section 91 of the Town and Country Planning Act 1990 \(as amended\)](#), planning permission granted by an LPA must be subject to a condition that sets the time limit within which the

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<sup>7</sup> [Local Validation List](#)

development must begin. [Planning practice guidance \(PPG\) on the Use of planning conditions](#) states that the “the relevant time limit for beginning the development is not later than the expiration of:

- 3 years beginning with the date on which permission is granted, or:
- Such other period (whether longer or shorter) as the local planning authority may impose.”<sup>8</sup>

- 4.31. Paragraph 81 of the NPPF sets out that applications for housing development, LPAs should consider imposing a planning condition in which development must begin within a timescale shorter than the relevant default 3-year period. This is to ensure that these developments are implemented in a timely manner.
- 4.32. To maximise the likelihood of delivery of housing in the short term, the Council will explore whether it will be appropriate to impose a condition on any application for new housing to commence within 2 years from the date of planning permission granted. Where outline permission is granted, the Council will also explore a similar approach to ensure that timescales for commencing development are reduced.
- 4.33. The decision whether to impose a shorter commencement condition will involve discussions between both the Planning Policy and Development Management teams within The Council. Ultimately, any decision on its appropriateness will rest with the Head of Development Management and whether any decision will necessitate consultation with key stakeholders before determination, including members of the planning committee.
- 4.34. Lapsed Permissions
- 4.35. It is inevitable that every year there will be unimplemented planning permissions that lapse. Circumstances that result in a lapse of permissions may relate to site issues and / or financial issues maybe prevalent for which there is little the Council can do to reduce this.
- 4.36. The Council will monitor lapse rates, numbers of dwellings permitted, and the time taken for sites to progress from approval to completion. These are considered key indicators to monitor performance and delivery. Additional action to address notifying applicants whose planning permissions are due to expire will be explored once the Council are successful in the appointment of a monitoring officer.

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<sup>8</sup>(Paragraph: 027 Reference ID: 21a-027-20140306)

## 5. Monitoring and Future Review

- 5.1. The Council will continue to monitor the number of new planning permissions permitted and the completions of new dwellings to feed into its annual housing land supply position. This will also include contacting the development industry requesting updated forecasted delivery for the larger housing sites in the borough.
- 5.2. This Housing Delivery Test Action Plan will be reviewed on an annual basis where The Council does fall short of 95% of its HDT measurement during the reported year. The Council are required to return to the Government the number of dwellings completed within each financial year, which then feeds into the HDT results expected in winter 2025. Any such review will establish any updated issues for the shortfall of housing and assess the overall effectiveness of the Housing Delivery Test Action Plan.

## Cheltenham Borough Council

### Cabinet – 10 June 2025

### Petersfield Community and Sports Hub

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**Accountable member:**

Cllr Peter Jeffries, Cabinet Member Finance & Assets

**Accountable officer:**

Richard Gibson, Head of Communities, Wellbeing & Partnerships

**Ward(s) affected:**

St. Peters

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**Key Decision:** No

**Executive summary:**

The proposed Petersfield Community and Sports Hub building will form part of a wider over-arching strategy to support the St Peters and the Moors area.

The building will be located at the site of Saracens FC football ground in the Moors estate and will replace the existing club-house facilities that are housed within two shipping containers to the north of the football pitch. The site is owned by the Council. Saracens FC has a 25 year lease on their ground and the land where the shipping containers are located, with 22 years remaining.

This report seeks Cabinet approval for the terms by which an amended lease could be offered to Saracens FC and the terms by which a separate lease could be offered to the Petersfield Partnership CIO, which was set up in 2023 to deliver the hub building.

To support fundraising for the hub building, this report seeks Cabinet approval to use the 5% management fee that accrues from its role as locally trusted organisation for the Big Local project to support the Petersfield Partnership deliver the hub building.

The report also seeks Cabinet approval to enter into a grant agreement with Petersfield Partnership to ensure proper governance over the use of the funds and to enter into a management agreement to ensure that the hub building is managed for the benefit of the local community during the period of the lease.

Due to the number of touchpoints between the Council and the project, there are a number of risks to the Council which will be mitigated via the approaches set out in this report.

**Recommendations: That Cabinet:**

- 1) approves the disposal by way of two separate leases of land subject to the meeting of a set of conditions set out in para 3.8;**
- 2) once these conditions are met, delegates authority to the Director for Finance & Assets, in consultation with the Cabinet Member Finance & Assets and the Director of One Legal, to agree the terms of the lease and conclude the letting;**
- 3) commits to allocating the following sums to the hub building:**
  - the Big Local fund of £356,643 which is currently held by the Local Trust, but which will be drawn down by the Council;**
  - the council's allocation of the future administration fee of £17,832, that accrues to the Council from its role as accountable body for the SPTM partnership;**
  - the previous administration fee of £42,143 that forms part of the funding currently held by the Council; and**
  - other funding currently held by the Council for the project comprising the Big Local underspend, the contribution from the Housing Revenue Account and the Police and Crime Commissioner funding totalling £71,133.**
- 4) enters into a grant agreement with the Petersfield Partnership CIO to facilitate the transfer of the funds set out above**
- 5) enters into a management agreement with the Petersfield Partnership CIO to ensure that the hub building is managed for the benefit of the local community;**
- 6) delegates authority to the Director of Governance, Housing and Communities, in consultation with the Cabinet Member Finance & Assets, to agree the final terms of the grant and management**

**agreements and to conclude the arrangements to ensure the hub is managed for the benefit of the community;**

- 7) enters into other such documents as the Director of One Legal deems necessary or desirable to reflect the terms negotiated.**

## **Implications**

### **1.1 Financial, Property and Asset implications**

**Property:** Section 4 of the report sets out the proposed lease and s.123 arrangements. The proposed lease to Petersfield Partnership is at a peppercorn rent for a term ending on 4 May 2047 and would therefore be considered less than best consideration. This obligation can be waived with the consent of the Secretary of State, who has given a General Consent to such disposals where, in the reasonable opinion of the Local Authority, this disposal is for social, economic or environmental benefit of the inhabitants of the Authority's area or any of them.

The land is also designated Public Open Space and any disposal would be pursuant to s123(2)(A) of the Local Government Act (1972).

As required, S123 Notices were published 8<sup>th</sup> May 2025 and 15<sup>th</sup> May, advertising the disposal by way of lease to the Petersfield Partnership. As at 29<sup>th</sup> May 2025, the end of the consultation period, no representations have been made to the Council.

Leases over 7 years require consent under s123 and in line with the Council's constitution, all leases at less than best consideration must be agreed by Cabinet.

In addition to the lease, the tenant is required to enter into a Management Agreement for the running of the completed facility. The lease will further be drafted in such a manner that allows for the Council, as landlord, to check that the tenant is meeting the terms and conditions of both the lease, and the Management Agreement. A break clause has been added in both the landlord and tenant's favour, at Year 10, and every 5 years thereafter which can be exercised if a persistent or material breach of the lease terms is found, and the Council will rely in the usual remedies in law to address this.

**Signed off by:** Claire Pockett, Surveyor

**Date:** 30.05.2025

**Financial:** Whilst there are no financial impacts on the revenue budgets of the Council, the recommendations set out above cover a number of funds that are either currently held by the Council or will be accrued by the Council in the future. The recommendations cover the following sources, totalling £131,108:

- £17,832 from the future management fee that the council will accrue from its role as accountable body
- £42,143 held in COM104 from the previous management fee that the Council accrued from its role as accountable body
- £24,133 underspend held in COM104 from the current plan held by the Council held under COM104
- £25,000 from the Council's Housing Revenue Account
- £22,000 from the Office of the Police and Crime Commissioner for Gloucestershire – currently held by the Council in GBD002 R9102 GRA040

Section 4 of this report sets out more details on the above and also outlines the proposed costs of the project.

Section 5 of the report sets out the financial and property risks to the council from the project

**Signed off by:** Ela Jankowska – Finance Business Partner **Date:** 29.05.2025

## 1.2 Legal implications

The proposed lease areas forms part of the Council's Open Space. Any decision to grant a lease thereof must first be advertised for 2 weeks as a 'Disposal of Open Space' pursuant to s123(2A) of the Local Government Act 1972 in the Public Notice Section of a local newspaper. Advertisements have been placed and the objection period has now expired and no objections were received.

The Council's Constitution requires that the decision to dispose of Public Open Space (including leasehold disposals) rests with Cabinet.

Further to this, the proposed lease to Petersfield Partnership is at a peppercorn rent for a 25 year and would therefore be considered less than best consideration. Under s123, the Council has an obligation to secure best consideration reasonably obtainable when disposing of a property by way of a lease for more than 7 years. This obligation can be waived with the consent of the Secretary of State, who has given a General Consent to such disposals where, in the reasonable opinion of the Council, the disposal is for:

- The promotion or improvement of economic well-being.
- The promotion or improvement of social well-being
- The promotion or improvement of environmental well-being.

The General Consent can only be relied upon where the difference between the consideration and the unrestricted value of the site is less than £2 million. A valuation of the site should therefore be carried out. If the difference exceeds £2 million or if it is deemed that the disposal will not promote the economic, social or



environmental wellbeing of the area, then specific consent will need to be sought to the grant of the lease.

It would also be advisable to annex a management plan to the lease setting out how Petersfield Partnership will manage the premises for a set period of time (e.g. the first 3 years of the lease term). This will allow the Council to approve the plan in advance and should ensure that the premises are effectively managed.

The lease will be of the whole site comprising the land on which the new hub building will be constructed, including part of the area currently leased to Saracens FC. This means that in addition to the lease to Petersfield Partnership, the existing lease to Saracens FC will need to be surrendered and a new lease granted to Saracens, excluding the area of land on which the building will be situated and reserving a right of way for the benefit of the Council and its tenants so that Petersfield Partnership will have access to the building. Given the impending local government reorganisation, the right should also be granted for the benefit of successors in title.

### Commercial

The Council intends to allocate grant funding from the Local Trust as part of the Big Local Project. The Council is the 'locally trusted organisation' for such funding, meaning that it is the recipient (but not the ultimate recipient) of the funding and as such takes on the obligations from the original funder (the Local Trust). This mechanism means that the Council is responsible for compliance with the grant agreement and also ensuring that the ultimate grant recipient (Petersfield Partnership CIO) also complies with the same.

Given this position, the Council will need to also enter into a grant agreement with Petersfield Partnership CIO, to codify its obligations and allow the Council to clawback/ require repayment in the event that Petersfield Partnership CIO causes the Council to be in breach of its own grant agreement.

Alongside the grant agreement and a lease, the Council will need to also enter into a management agreement with Petersfield Partnership CIO. This will sit alongside the lease and set out how the facility should be run.

It should, however, be noted that Petersfield Partnership CIO is a relatively new Charitable Incorporated Organisation and as such, even with the above safeguard in place, it may not be able to repay sums or have the financial and commercial stability to deliver the project and account for any unexpected additional costs and requirements. Section 5 contains further information about the risks.

The project mainly consists of the construction of the Petersfield Hub and as such Petersfield Partnership CIO will be required to appoint various consultants and contractors to design and deliver the works. It is advised that the Council has a form of management and reporting right over the project to ensure that the proposed works and construction are in line with the Local Trust's requirements (and permitted use of funding), and to assist Petersfield Partnership CIO with project oversight. It is

also advised that the Council obtain collateral warranties with any contractor engaged to conduct work for this project, as the Freeholder.

**Signed off by:** One Legal, [legalservices@onelegal.org.uk](mailto:legalservices@onelegal.org.uk)

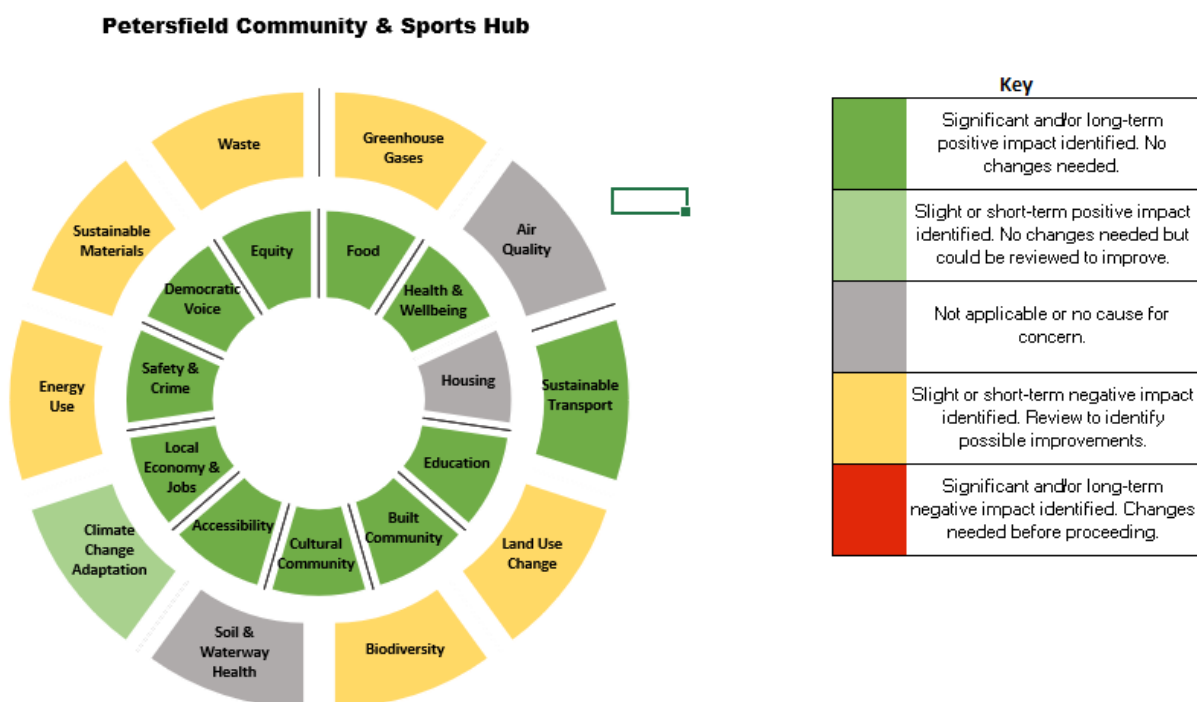
### 1.3 Environmental and climate change implications

The completed dashboard and summary report are attached as **Appendix 2**. Being a new-build construction means there are some potential short-term negative environmental impacts. However, the building is very positive in its contribution to social outcomes.

As part of the planning application a bio-diversity net gain report was produced to mitigate the loss of a small quantity of grass. Mitigations will be delivered onsite via planting 3 native sampling sized trees and at least 6m of native hedgerow.

Within the cost plan, there are the following allowances; £2.5k for a Simplified Building Energy Model assessment, plus £10k for installation of PV panels. Subject to being able to access other funding, further opportunities will be taken to minimise the carbon emissions from the building including upgraded windows, rainwater harvesting and additional PV panels.

In addition, the Climate Change Supplementary Planning Document will be shared with the contractor for them to reflect best practice within their building construction plan to address matters such as the use sustainable materials and arrangements to manage waste and recycling.



**Signed off by:** Maizy McCann, Climate Emergency Officer,  
[maizy.mccann@cheltenham.gov.uk](mailto: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*

#### **1.5 Equality, Diversity and Inclusion Implications**

An equality impact assessment has been carried out and this is attached as **Appendix 3**. This shows that there are positive impacts from the hub proposal in terms of its role to support local children and young people, people who might have disabilities and people living in low-income communities. No negative impacts were identified.

#### **1.6 Performance management – monitoring and review**

The conditions to be applied through the grant agreement, management agreement and lease will set out the Council's requirements around governance and reporting during the build that will allow the Council to have early warning of any potential issues.

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## **2 Background**

2.1 The Petersfield Sports and Community Hub building will enable the people of St Peters and the Moors to take part in social, sport, leisure, wellbeing and other activities and to also build their confidence and skills.

2.2 The project is being led by the Petersfield Partnership, a Charitable Incorporated Organisation (CIO) that was established in 2023 for the purpose of delivering the hub building. The Partnership has six trustees with a range of skills and experience. The Partnership will be responsible for overseeing the running of the hub building and Cheltenham Saracens will have a user agreement in place to protect their needs

2.3 The aims of the hub building are as follows:

- New long term community facilities are secured for local residents;
- Long-term income is directed at benefitting the local community;
- Improved wellbeing of local residents;
- A safer community; and
- A sense of pride, growth, development and improved performance of Cheltenham

## Saracens FC

2.4 Planning application for the hub building was submitted on 1 April 2025 and the target date for determination is 4 June 2025.

2.5 The Petersfield Partnership CIO have entered into a pre-services construction agreement with a local contractor. Once planning secured and agreement is secured from the Council regarding lease arrangements, Petersfield Partnership will enter into a standard JCT contract to cover the construction work which will be issued on a design and build basis. The works will be over seen by Petersfield Partnership's Quantity Surveyor.

### **3. Proposed Lease arrangements**

3.1. In 2021, Cheltenham Saracens Football Club were granted a lease of land and premises for a term of 25 years from the Council

3.2. To facilitate the construction of the hub building, which will be constructed on land currently leased to Cheltenham Saracens, the proposed lease arrangements are as follows:

- Cheltenham Saracens FC to surrender their lease;
- Cheltenham Saracens FC to enter into a new lease with an amended boundary to the northern part of the site on the same terms as the current lease;
- The Council enters into a separate lease with Petersfield Partnership for the site of the hub.

3.3. To enable access to the hub building, the Council will reserve a right over a strip of land for the benefit of the Council and its tenants and successors in title when granting the Saracens lease, which will then enable the Council to grant a lease to Petersfield Partnership with the benefit of that right. This will create a legal right (easement) for the Council of which Petersfield Partnership will have the benefit. The proposed lease plans are set out in appendix 4.

3.4. The proposed lease to Saracens FC will be at an annual charge of £4,000 pa for a 25-year term. This will be offered on a full repairing and insuring basis and will include a break clause at year 10.

3.5. The proposed lease to Petersfield Partnership will be at a peppercorn rent for a 25-year term and will be offered on a full repairing and insuring basis and will include a break clause at year 10. The disposal is therefore to be considered at less than best consideration. The land is also designated Public Open Space and any disposal is pursuant to s123(2)(A) of the Local Government Act (1972).

3.6. Leases over seven years require consent under s123 and in line with the Council's constitution, all leases at less than best consideration must be agreed by Cabinet.

3.7. This report sets out a recommendation to Cabinet to grant a lease subject to conditions to ensure the Petersfield Partnership completes the building work within a specified timescale. The lease will include provisions for termination in the event that the building works are not completed within that timescale.

3.8. The proposed conditions are as follows:

- Petersfield Partnership to have secured planning permission and all such other permissions, consents, notices and requirements necessary to deliver the Project (including landlord consent and green space approval);
- Petersfield Partnership to have obtained an agreed fixed price quotation from the selected contractor (such quotation to be valid for the Grant Period) for the Project;
- Petersfield Partnership to have in place all necessary funding to deliver the Project, including having secured additional funding for the Project and maintaining sufficient contingency sums to cover any price increases; and
- Petersfield Partnership to have agreed to a construction timeline with the selected contractor that will enable the project to be delivered in accordance with any grant drawdown and payment requirements of the funders.

3.9. As the land is designated public open space, the Council has undertaken a process to comply with section 123 of the Local Government Act 1972. A notice was placed in the Gloucestershire Echo on 8th and 15th May advertising the proposed disposals of public open space to Saracens FC and the Petersfield Partnership and giving until 30th May for anyone to raise an objection. No objections were received.

#### 4. Costs and fundraising

4.1. The following are the identified costs for the construction of the hub building along with a range of ancillary costs:

Item	Amount
Bio-diversity net-gain report	£1,797
Energy Model Assessment	£2,500
Talus Construction - Stage 4 design	£20,000
Talus Construction - structural engineer and architect fees	£20,000
Talus Construction – building control costs	£3,930
Talus Construction – other temp works	£3,500
Talus Construction costs; Substructures; superstructures; mechanical, electrical & plumbing; internal fit-out; drainage; design allowance, prelims; incoming water main & electrical main; OHP	£449,815

## Page 46

Internal fit-out – furniture	£10,000
Contingency	£30,000
QS to completion of build	£17,880
Legal fees	£17,000
VAT Set up	£3,600
PV solar panels	£10,000
<b>Total</b>	<b>£590,022.00</b>

## 4.2. Funding secured to date:

Big Local funds held by Local Trust	£356,643	Confirmed, but subject to meeting conditions set by Local Trust
The Council's future Big Local admin fee based on additional £356k to be drawn down	£17,832	Subject to agreement by Cabinet
The Council's previous Big Local admin fee held by the Council at 21.5.25	£42,143	Subject to agreement by Cabinet
Big Local underspend from current plan held by the Council at 21.5.25	£24,133	Confirmed and will be included in the grant agreement
Contribution from the Council's Housing Revenue Account	£25,000	Confirmed – subject to grant agreement with the Council
Contribution from the Office of the Police and Crime Commissioner for Gloucestershire – held by the Council	£22,000	Confirmed and will be included in the grant agreement
Gloucestershire County Council Build Back Better Fund via Cllr Willingham	£15,000	Confirmed and to be held by Petersfield Partnership
Football Foundation	£70,700	Confirmed and to be held by Petersfield Partnership
Local Trust grant for solicitor fees	£10,000	Confirmed and to be held by Petersfield Partnership
Jockey Club donation	£1,952	Received held by Petersfield Partnership
The Petersfield Partnership - Local Fundraising	£3,256	Received held by Petersfield Partnership
The Petersfield Partnership - Local Fundraising	£2,000	TBC
<b>Total</b>	<b>£590,659.00</b>	

4.3. The main source of funding for the project is Big Local funding for which the Council is the accountable body.

4.4. Big Local funding is Lottery funding channelled through the Local Trust, the national body responsible for supporting 150 areas who have each been awarded £1m to support resident-led improvements.

4.5. Locally, the St. Peters and the Moors area was chosen in 2012 as the area that would benefit from the £1m and a local partnership, the St. Peters and the Moors

(SPTM) Partnership was set up to coordinate the programme. The SPTM partnership does not have a legal structure, hence Cheltenham Borough Council acts as its accountable body.

- 4.6. The SPTM partnership has an agreed funding plan in place with Local Trust to the value £522,643 for the period 1 November 2023 to 31 March 2026. £356,643 of that allocation is being held by the Local Trust.
- 4.7. As the Council acts as the accountable body, it will need to enter into a grant agreement with Petersfield Partnership CIO to ensure proper governance over the use of the funds and to mitigate the risks to the council from the project.
- 4.8. In addition the Council will also need to enter into a management agreement to ensure that the hub building is managed for the benefit of the local community in line with the terms of the grant from Local Trust.

## **5. Summary of risks for the Council**

- 5.1. Although all contractual agreements will sit with the Petersfield Partnership CIO, in light of the fact that this is a relatively new body with little financial or project management experience and with a relatively small set of trustees, this report highlights the potential risks to the Council leaning on the learnings from recent construction projects and shaped by the obligations required by the Local Trust funding.

### **Financial – procurement phase**

If the cost construction estimates are not sufficiently robust, then there is a risk that quoted prices exceed the available budget. This may mean the Petersfield Partnership CIO approach the Council for additional funding to close the funding gap to begin the construction work.

This risk is mitigated to certain extent in that Petersfield Partnership now have a detailed cost plan for the construction dated 16 May 2025.

### **Financial – construction phase**

If the construction costs are not actively managed during the construction phase, there is a risk that actual costs exceed the available budget. This may mean the Petersfield Partnership CIO approach the Council for additional funding to close the funding gap to complete the construction of the building. Alternatively, in the event that there are no other sources of funding, the Council is unable to provide additional funding and/or the Local Trust or other fund withdraw funding, the project may have to be abandoned, meaning that the Council may be left with a half-built sports hub to finish construction, manage and run or demolish.

This risk is mitigated to certain extent in that Petersfield Partnership have a contingency fund of £30,000 and have worked with the contractor to identify and cost all the possible risks that might be incurred during construction. Petersfield Partnership has confirmed that the contingency pot is sufficient to cover these risks. In addition the Partnership has contracted with a quantity surveyor to act as their client during the construction phase to manage costs.

#### **Financial - grant agreements between the Council & Petersfield Partnership CIO**

If the Council were to continue with the project without a grant agreement or deed of adherence in place (adequately covering the Council's obligations and passing the same to Petersfield Partnership CIO), the Council could be at risk of repayment of the grant to the Local Trust without the ability to claim the same from Petersfield Partnership CIO.

There is a further risk that the use of the hub building may become dominated by Saracens FC with the potential for community uses to be excluded.

This risk is mitigated to certain extent in that robust management and grant agreements will be in place prior to construction commencing that will set out the obligations on Petersfield Partnership. However, this will rely on the ability for the Council to require action by Petersfield Partnership CIO. However, given that Petersfield Partnership CIO is relatively new incorporated entity, there is the risk that any mitigations may not actually be viable in practice. This does, largely depend on Petersfield Partnership CIO's financial (and commercial) position, as it may not be financially able to reinstate the site should the works not be completed, and the Council would likely have nothing to gain from bringing a claim against Petersfield Partnership CIO due to lack of capital, assets etc. This would, therefore, almost always leave the Council with a site to manage, whether completed or not should Petersfield Partnership CIO be unable to proceed for any reason.

#### **Robustness of Petersfield Partnership**

As Petersfield Partnership CIO is relatively new, the Council has no guarantee of its stability (including from a financial perspective). The trustees have been in place since March 2023 and as such it is uncertain if this CIO have the capacity and skills to manage the building in the longer-term.

#### **Planning**

There is a risk that planning permission may not be granted for the amended scheme.



### **Reputation**

If the Council does not pass the Big Local funds onto Petersfield Partnership CIO then the Council may be in breach of its obligations to act in good faith as the Locally Trusted organisation for the Big Local project.

If the Council is not seen as being active in its support for the Petersfield Community Hub, then this may harm the reputation of the council within the local area at a time when the Council is taking a lead on supporting a range of multi-agency interventions in the area.

Alternatively, there are also reputational risks if the project goes ahead and the Council is required to step-in for any reason, for example, if the construction does not complete or if Petersfield Partnership CIO are unable to manage the facilities

- 5.2. It is proposed that these risks are mitigated via conditions in the grant agreement and lease between the Council and Petersfield Partnership CIO as set out in para 3.9 plus securing commitments from Petersfield Partnership CIO to the following:
- Any building on the site to be the sole responsibility of the Partnership and not the Council;
  - Clear requirements around governance and reporting during the build that will allow the Council to have early warning of any potential issues.

## **6. Alternative options considered**

- 6.1. The Council did consider delivering the project itself. But a number of risks were identified at the time including the ability of the Council to fundraise to secure the required budget to deliver the proposed hub building.

## **7. Consultation and feedback**

- 7.1. The s.123 process entailed a notice being placed in the Gloucestershire Echo on 8th and 15th May advertising the proposed disposals of public open space to Saracens FC and the Petersfield Partnership and giving until 30th May for anyone to raise an objection. No objections were received OR The objections submitted are as follows:
- 7.2. In addition, the planning application was made available for public consultation. No objections were received.
-

**Report author:**

Richard Gibson

Head of communities, wellbeing & partnerships

**Appendices:**

1. Risk Assessment
2. Climate Change Impact Assessment
3. Equality Impact Assessment
4. Site plan

**Background information:**

N/A

## Appendix 1: Risk Assessment

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
<b>FINANCIAL – PROCUREMENT PHASE</b> If the cost construction estimates are not sufficiently robust, then there is a risk that quoted prices exceed the available budget.  This may mean the Petersfield Partnership CIO approach the Council for additional funding to close the funding gap to begin the construction work.	Head of communities, wellbeing & partnerships	3	2	6	Reduce	Robust grant agreement between CBC and the partnership setting out that no construction work can start on-site until Petersfield Partnership have satisfied CBC that funding and project timeline is in place to enable successful delivery of the project.  Petersfield Partnership now have a detailed cost plan for the construction dated 16 May 2025.	Head of communities, wellbeing & partnerships	July 2025
<b>FINANCIAL – CONSTRUCTION PHASE</b> If the construction costs are not actively managed during the construction phase, there is a risk that actual costs exceed the available budget. This may mean the Petersfield Partnership CIO approach the Council for additional funding to close the funding gap to complete the construction of the building.  Alternatively, in the event that there are no other sources of funding, the Council is unable to provide	As above	3	3	9	Reduce	Robust grant agreement between CBC and the partnership setting out that no construction work can start on-site until Petersfield Partnership have satisfied CBC that funding and project timeline is in place to enable successful delivery of the project.  Petersfield Partnership have a contingency fund of £30,000 and have worked with the contractor	As above	December 2025

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
additional funding and/or the Local Trust or other fund withdraw funding, the project may have to be abandoned, meaning that the Council may be left with a half-built sports hub to finish construction, manage and run or demolish.						to identify all the possible risks that might be incurred and the contingency pot is sufficient to cover these risks.  In addition the Partnership has contracted with a QS to act as client during the construction phase to manage costs.		
<b>FINANCIAL - GRANT AGREEMENTS – BETWEEN CBC &amp; PETERSFIELD PARTNERSHIP</b> If the Council were to continue with the project without a grant agreement or deed of adherence in place (adequately covering the Council's obligations and passing the same to Petersfield Partnership CIO), the Council could be at risk of repayment of the grant to the Local Trust without the ability to claim the same from Petersfield Partnership CIO.  There is a further risk that the use of the hub building may become dominated by Saracens FC with the potential for community uses to be excluded.	As above	3	3	9	Reduce	Ensure appropriate grant and management agreements are in place to govern the relationship between CBC and Local Trust, and between CBC and Petersfield Partnership as per the recommendations set out in this report.	As above	July 2025

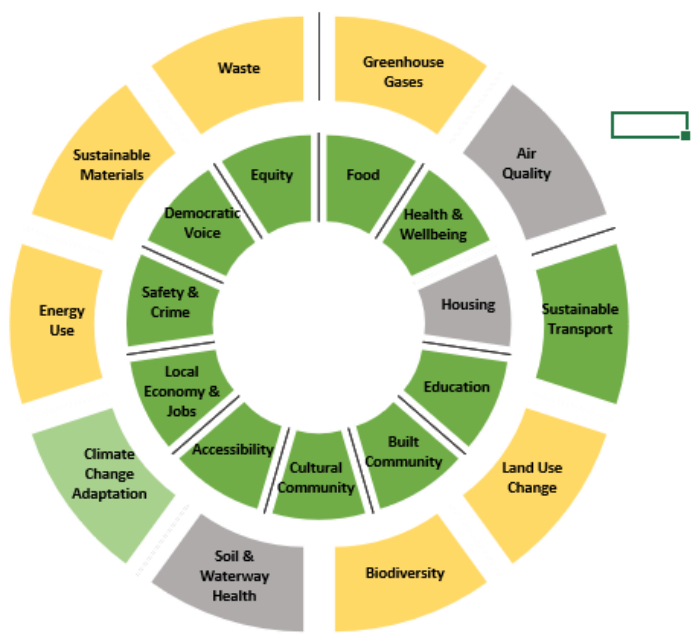
Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
<b>S.123 DISPOSAL</b> If CBC were to grant a lease or otherwise dispose of the land without undertaking the correct statutory process with regards to Public Open Space, CBC may be at risk of judicial review. Any objections need to be considered and dealt with appropriately.	As above	4	1	4	Reduce	The s.123 process was undertaken with a timescale in place to allow sufficient time for objections to be considered by Cabinet in conjunction with the proposal to grant the lease.  In the end, no objections were received.	As above	July 2025
<b>ROBUSTNESS OF PETERSFIELD PARTNERSHIP</b> As Petersfield Partnership CIO is relatively new, the Council has no guarantee of its stability (including from a financial perspective). The trustees have only been in place since March 2023 and as such it is uncertain if this CIO have the capacity and skills to manage the building in the longer-term.	As above	3	4	12	Reduce	Ongoing support from Local Trust to support Petersfield Partnership including help with business planning, policy writing and governance skills.	As above	March 2026
<b>PLANNING</b> There is a risk that planning permission may not be granted for the amended scheme.	As above	3	2	6	Reduce	The planning application was submitted at the beginning of April and is due to be determined on 4 June 2025.  The lease and grant agreements will be conditional on PP obtaining a suitable	As above	June 2025

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
						planning permission by a specified date.		
<b>REPUTATION</b> If the Council does not pass the Big Local onto Petersfield Partnership then the council may be in breach of its obligations to act in good faith as the Locally Trusted organisation for the Big Local project.	As above	3	3	9	Reduce	One Legal providing legal advice as to the proposed grant agreement.  Proceed with the Cabinet decision.	As above	July 2025
<b>REPUTATION</b> If the Council is not seen as being active in its support for the Petersfield Community Hub, then this may harm the reputation of the Council within the local area at a time when the Council is taking a lead on supporting a range of multi-agency interventions in the area.	Director Community and Economic Development	3	3	9	Reduce	Proceed with the Cabinet decision.	As above	July 2025

Appendix 2

Climate Change impact assessment – summary report

Petersfield Community & Sports Hub



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

ENVIRONMENTAL	Scores	Action	Justification
Greenhouse Gases	-2	Review - identify possible improvements	The building will need heating, and this electrical use will have an impact on Greenhouse Gases.
Air quality	0	No action required.	It is not believed that the building will have any impact on air quality - there will be a small kitchen, but this will not be used for catering purposes.

Sustainable Transport	4	No action required	The building's core purpose is to support the immediate community of the Moors - hence it is expected that the majority of journeys to the building will be on foot. However, Saracens Football Club will also be using the building and a proportion of their players / staff and spectators will be arriving using their own vehicles as they do currently.
Biodiversity	-1	Review - identify possible improvements	as above - The site of the building currently includes a small area of grass. As part of the planning application a bio-diversity net gain report was produced to mitigate the loss of a small quantity of grass. Mitigations will be delivered onsite via planting 3 native sampling sized trees and at least 6 m of native hedgerow.
Land use change	-1	Review - identify possible improvements	The site of the building currently includes a small area of grass. As part of the planning application a bio-diversity net gain report was produced to mitigate the loss of a small quantity of grass. Mitigations will be delivered onsite via planting 3 native sampling sized trees and at least 6 m of native hedgerow.
Soil and waterway health	0	No action required.	The building is located near the River Chelt, so there is some sensitivity around how waste and rain water is dealt with.
Climate Change Adaptation	2	No action required	The building will be designed to be resilient as possible to climate change impacts and being a community centre, there is an opportunity to use the space to help the local community understand the impacts of climate change and what adaptations / changes in behaviour they can make within their own lives.
Energy Use	-2	Review - identify possible improvements	This is a new building of c.170 sqm - the building will need to be heated and currently this will be via mains electricity. The building will be built to be as energy efficient as possible to both mitigate the impacts on climate change but to also reduce the running costs of the building.
Waste	-2	Review - identify possible improvements	The new building will house new activities including community, sports and leisure uses. As a result, a certain amount of waste will be produced. All attempts will be made to make sure as much as possible is recycled as possible.
Sustainable Materials	-2	Review - identify possible improvements	The building wherever possible will be constructed using sustainable materials - we are going through the procurement process at the moment, and suppliers have been asked to explain their approach to helping the construction and long term use of the building achieve net zero.
<b>SOCIAL</b>	<b>Scores</b>	<b>Action</b>	<b>Justification</b>
Food	0	No action required.	The building will support community activities in the Moors - one of the activities being considered will be a food pantry to enable local residents to access cheaper food - building on the success of a previous food project that ran until 2022. In addition, health partners are keen to use the building to promote healthy lifestyles.



Health	0	No action required.	The building will play an important role in supporting the health and wellbeing of the local community - health colleagues have already discussed how they can use the building in the future, plus its role as a sporting club will also help promote healthy lifestyles.
Housing	1	No action required	Over time, the building will help create a more sustainable community in the Moors and so help with the overall management of the estate.
Education	0	No action required.	The building has the opportunity to be used to support lifelong learning and skills development within the local community, plus opportunities for volunteering.
Community	0	No action required.	The building will be the catalyst for improvements to local green spaces within its vicinity. These green spaces have not been improved for many years and are overgrown and unkempt. A plan for the revitalisation of the green spaces will be drawn up in conjunction with CBC.
Culture	0	No action required.	The hub building has the potential to be used as a community space for cultural activities, there are no firm commitments yet, but these will be explored with partners via the culture board.
Accessibility	0	No action required.	The hub building will be designed with accessibility at its heart and have level access throughout. Activities to be delivered from the building will help the local community digital, social and financial barriers.
Local Economy and Jobs	0	No action required.	The building has the opportunity to be used to support lifelong learning and skills development within the local community, plus opportunities for volunteering, that will support the local economy.
Safety	0	No action required.	The hub building is an integral part of a strategy to reduce the impact of crime within the local community; the estate has currently got issues with organised criminal gangs, and a multi-agency response is being delivered. The building will provide much needed community space to increase community resilience.
Democratic Voice	0	No action required.	The hub building has come about as a result of much engagement with the local community - they have expressed their desire to benefit from community facilities. The local community will be engaged throughout the construction phase through regular updates - and as part of the running of the building.
Equity	0	No action required.	A separate equality impact assessment has been carried out on the building and this shows that there are no negative equality impacts as a result of the project.

Appendix 3 – equality impact assessment

Community impact assessments – for services, policies and projects

What is a community impact assessment?

A community impact assessment is an important part of our commitment to delivering better services for our communities. The form will help us find out what impact or consequences our functions, policies, procedures and projects have on our communities, as well as employees and potential employees.

By undertaking an impact assessment, we are able to:

- Take into account the needs, experiences and circumstances of those groups of people who use (or don't / can't use) our services.
- Identify any inequalities people may experience.
- Think about the other ways in which we can deliver our services which will not lead to inequalities.
- Develop better policy-making, procedures and services.

Background

Name of service / policy / project and date	Petersfield Community & Sports Hub
Lead officer	Richard Gibson, Head of communities, wellbeing & partnerships
Other people involved in completing this form	

## Step 1 - About the service / policy / project

<b>What is the aim of the service / policy / project and what outcomes is it contributing to</b>	<p>The Petersfield Community and Sports Hub building has been developed over the last four years by the St Peter's and The Moors Big Local Partnership (SPTM) to create a lasting legacy within the area.</p> <p>In March 2023, the Petersfield Partnership CIO (charitable incorporated organisation) was established for the purpose of delivering the hub project.</p> <p>The hub project is part of a wider over-arching strategy to support the Moors estate.</p> <p>Construction is hoped to begin in Summer 2025, and be complete by the start of 2026.</p>
<b>Who are the primary beneficiaries of the service / policy / project and how do they / will they benefit</b>	<p>Local residents living on the Moors estate and in the wider area</p> <p>Saracens Football Club, players and spectators</p>
<b>How and where is the service / policy / project implemented</b>	<p>The hub project will be built on some green open space to the immediate west of the current Saracens FC football pitch</p>
<b>What potential barriers might already exist to achieving these outcomes</b>	<p>Funding</p>

## Step 2 – What do you know already about your existing / potential beneficiaries

<b>What existing information and data do you have about your existing / potential beneficiaries e.g. Statistics, customer feedback, performance information</b>	<p>The population of the estate is approx. 620 people. There is a relatively high percentage of young people living on the estate with 42% aged under 25. There is also a perception that there is a high percentage of vulnerable adults living in the community.</p> <p>The estate is geographically isolated from the wider Cheltenham community with the four lane A4019 Tewkesbury Road to the north, the mainline Bristol to Birmingham railway and the Saracens football ground to the east and a business estate to the west. The southern boundary is formed by the River Chelt and a linear park (Chelt Walk) which includes a disused BMX track and an abandoned rose garden. The only road access is via the A4019.</p>
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	The Moors has no shops, no community facilities and no service points for local agencies. The nearest small shop together with a takeaway, an off licence and a bookmakers requires a 0.5km walk along the busy A4019, over the railway bridge and then across four lanes of traffic. The obstacle of the A4019 creates a significant challenge for young families and anyone who is mobility-impaired so is a major contributor to the isolation experienced in the area.
<b>What does it tell you about who uses your service / policy and those that don't?</b>	<p>The Council manages part of the estate. Housing services have actively engaged with local residents and a summary of reported issues includes:</p> <ul style="list-style-type: none"> <li>• Limited community engagement</li> <li>• A lack of trust and confidence in local agencies</li> <li>• Community safety concerns, exacerbated by an under-reporting of crime and ASB</li> <li>• Presence of an organised crime group on the estate, creating an atmosphere of fear and intimidation</li> </ul>
<b>What have you learnt about real barriers to your service from any consultation with customers and any stakeholder groups?</b>	As above, engagement with the local community has consistently demonstrated the need for the hub building
<b>If not, who do you have plans to consult with about the service / policy / project?</b>	

### Step 3 - Assessing community impact

How does your service / policy / project impact on different groups in the community?

Group	What are you already doing to benefit this group	What are you doing that might disadvantage this group	What could you do differently to benefit this group	No impact on this group
<b>People belonging to race, cultural and ethnic groups</b>	The building will benefit from an equality and diversity policy, that will	Nothing identified	It is suggested that equality progress will be	

	set out the Partnership's approach to ensuring that everyone within the community can access the building and benefit from it.		monitored via an annual audit	
<b>People who are male or female, non-binary or other</b>	As above	Nothing identified	As above	
<b>People who intend or plan to undergo or who are undergoing or have undergone gender reassignment</b>	As above	Nothing identified	As above	
<b>People of different ages, including children and older people</b>	The building will have a specific role to support children and young people in the community and older people	Nothing identified	As above	
<b>People with disabilities and/or mental health conditions</b>	As above.  The building will be designed to have level access throughout	Nothing identified	As above	
<b>People who have a religion or belief, or who do not</b>	As above	Nothing identified	As above	
<b>People who are who are gay, lesbian, bisexual, heterosexual</b>	As above	Nothing identified	As above	
<b>People who are married or in a Civil Partnership</b>	As above	Nothing identified	As above	

<b>People who are pregnant or subject to maternity arrangements</b>	As above	Nothing identified	As above	
<b>Other groups or communities</b>	The building will support a low-income community	Nothing identified	As above	

#### Step 4 - what are the differences

<b>Are any groups affected in different ways to others as a result of the service / policy / project?</b>	None identified at this stage
<b>Does your service / policy / project either directly or indirectly discriminate?</b>	No
<b>If yes, what can be done to improve this?</b>	N/A
<b>Are there any other ways in which the service / project can help support priority communities in Cheltenham?</b>	None identified at this stage

#### Step 5 – taking things forward

<b>What are the key actions to be carried out and how will they be resourced and monitored?</b>	For the Petersfield Partnership to prepare an equality and diversity policy for the building to ensure that everyone within the community can access the building and benefit from it.
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<b>Who will play a role in the decision-making process?</b>	The trustees of Petersfield Partnership CIO
<b>What are your / the project's learning and development needs?</b>	None identified at this stage
<b>How will you capture these actions in your service / project planning?</b>	None identified at this stage

Appendix 4 – site plan

