

Cheltenham Borough Council Cabinet

Meeting date: Tuesday, 24 February 2026

Meeting time: 6.00 pm

Meeting venue: Council Chamber - Municipal Offices

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 - 22)

To approve the draft minutes of the Cabinet meetings on 16 December and 23 December 2025

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 Domestic Abuse Policy (Pages 23 - 64)

Report of Cabinet Member for Safety and Communities, Councillor Victoria Atherstone

6 Cheltenham Tree Strategy (Pages 65 - 136)

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

7 Leckhampton with Warden Hill Neighbourhood Plan Examiner's Report (Pages 137 - 198)

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

8 E-Bike and Battery Safety Policy (Pages 199 - 232)

Report of Cabinet Member for Housing and Customer Services, Councillor Flo Clucas

9 Final General Fund Revenue and Capital Budget Proposals TO FOLLOW

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

10 Final Housing Revenue Account (HRA) - Revised Budget TO FOLLOW

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

SECTION 6 : BRIEFING SESSION

- Leader and Cabinet Members

11 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: 16 December 2025

Meeting time: 6.00 pm - 7.25 pm

In attendance:

Councillors:

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

Also in attendance:

Tracey Birkinshaw (Director of Planning and Building Control), Paul Minnis (Director of Major Development and Regeneration) and Matt Ward (Head of Housing Services)

1 Apologies

There were no apologies.

2 Declarations of interest

There were no declarations of interest.

3 Minutes of the last meeting

The minutes of the meeting held on 18 November were approved as a true record and signed accordingly.

4 Public and Member Questions and Petitions

There were no Member questions or petitions. Two public questions had been received, the responses to which were taken as read. One questioner was present to ask a supplementary question.

1. Question from Richard Lawler to Cabinet Member for Housing and Customer Services, Councillor Flo Clucas

Cobham Road Flats Parking

At the Cobham Road flats, residents face ongoing parking stress due to a lack of dedicated spaces, leading to informal verge parking and damage to footpaths and grassed areas.

Would the Cabinet consider commissioning a **small-scale feasibility study** to explore creating additional residents' parking bays — for example by re-purposing a limited section of unused green space — as part of a broader estate-improvement approach?

If the Cabinet agrees this should be pursued, would it also consider appointing a **named senior officer** to lead the design and consultation process with residents, so the scheme can be progressed without adding excessive workload to existing operational teams?

Cabinet Member response

Thank you for the question.

Council Officers are undertaking a high-level review of properties that have been identified as having redevelopment potential and this is one of the sites on the list. They are just at the start of the process, and any development would likely be some time into the future. The block is already on the neighbourhood works list for next year to lay a concrete pad for bins and is also due for fencing renewal along the right-hand side of the block which will improve the general amenity of the area. However, any additional parking configuration would be best left until the high-level analysis is completed early in the New Year. A further update can be provided at this time.

No supplementary question

2. Question from Emma Nelson to the Leader, Councillor Rowena Hay

The Government has just announced that the elections scheduled for May 2026, for four regional mayors in England, have been postponed to 2028. Can the Cabinet please advise whether the Cheltenham Borough Council Elections for 20 of the 40 current Councillors, due to take place in May 2026, will definitely be going ahead? Please also provide details of circumstances that might impact and influence their decision, given the cost of running the Election, the amount of work already underway on the whole LGR model etc. and the fact that elected Councillors will have a very short term prior to the Unitary Elections in 2027.

Cabinet Member response

Thank you for the question. It is the government's decision as to whether elections in 2026 will go ahead. CBC is working on the assumption that elections will take place as scheduled.

As you know, Cheltenham Council is in an unusual position in that we held all-out elections following a boundary review in 2024 with those members topping the poll serving for four years. Therefore, members retain a strong electoral mandate until 2028, which on the current timescales will coincide with the vesting day of the new unitary authority.

We are currently engaging with the Ministry of Housing Communities and Local Government (MHCLG) to remind them of our boundary review and our all-out elections in 2024 and to ask for clarity on whether they wish for us to proceed with elections in 2026 which may not represent a good use of taxpayer money when we face the prospect of further elections in 2027 to the new shadow authority.

As you were a member of the previous Conservative Group in opposition on the council, I am sure you will recall that a budget amendment was proposed every year by your group to move to four-yearly elections. I assume on this basis that if MHCLG decided to postpone elections for Cheltenham in 2026, this would be something that would be entirely supported by the Cheltenham Conservatives.

Supplementary question

Thank you for your response and for recognising the constant call from Cheltenham Conservatives to move to four-yearly elections to save Cheltenham residents thousands of pounds.

What is the council's preferred outcome from engagement with MHCLG? The first paragraph says you are assuming elections will take place as scheduled. In third paragraph states you are asking MHCLG if it wishes CBC to proceed with 2026 elections, given the all-out elections last year and more elections in 2027. This implies you would rather not spend taxpayers' money for one year in office, and the second paragraph reinforces this underlying preference, justifying that those elections in 2024 continue for a further two years.

When did you last hear from MHCLG, when are you expecting to hear their decision, and what do you make of MHCLG Secretary Steve Reed's response today in the House of Commons on this subject?

Cabinet Member response

I cannot comment on Steve Reed's response as I haven't yet heard it.

This question has arisen because after the boundary review and all-out election in 2024, it was CBC's intention to go back to two-yearly elections, as has been the custom and practice for many years. At that point, we didn't know the Local Government Reorganisation was coming forward. If elections to shadow authorities

will be required in 2027, a lot of councils are now wondering if there is any point in having local elections in 2026, not least from a financial perspective, as the whole LGR process is costing a huge amount of money with no additional government funding to pay for it. We are waiting for government clarification as to whether or not the May 2026 elections should go ahead – the decision has to be made by the second week in February – but in the meantime, we will continue on the assumption that next May's local elections will take place.

5 Publication of the Infrastructure Funding Statement and CIL Rate Summary Statement

Note:

The following correction was made after the publication of the agenda:

- Appendix 4 IFS Part 3 Infrastructure List – Part-Funded Projects
The cost of the next business case stage is £2,061,855.67 (not £2,061,855.67)

The Cabinet Member for Planning and Building Control introduced the report, the statement and historic update of the IFS statement and CIL rate summary which we are required to publish. As such, it doesn't require debate or decision; Members are requested to agree to the recommendations as set out in the report. The detailed summary is in line with our Corporate Plan priorities, and Members will already be familiar with the regulatory requirements and figures. The contents are statutory, and with CIL contributions we also have to work with our SLP partners in collectively publishing this information.

He thanked the officers who worked hard in putting these reports together - Sam Layton, Sara Screen and Andrew Sherborne.

A Member commented that, given the massive pressure that local authorities are under, the importance of CIL funding cannot be understated, and said some exciting projects will be going forward with CIL funding, including works at the Prince of Wales Stadium and desilting the lakes in Pittville Park, as well as strategic projects. He said this demonstrates the importance of CIL monies to the council.

The Cabinet Member for Planning and Building Control agreed, adding that it is important to celebrate these great schemes and projects, and make sure that our communities are aware that they can ask for this help with community projects in need of support.

RESOLVED THAT:

- 1. the publication by 31 December 2025 of the Infrastructure Funding Statement (IFS) 2024/25, relating to the financial year ending 31 March 2025, and the submission of its CIL and S106 information to Government, is approved;**

- 2. the Annual CIL Rate Summary Statement December 2025 is approved and its publication on the Council's website by 31 December 2025 is approved.**

6 Revocation of a number of Supplementary Planning Guidance and Supplementary Planning Documents

The Cabinet Member for Planning and Building Control said this report is the result of a huge amount of work by the planning policy team to revoke out-of-date and superseded planning guidance notes, statements and documents. He said the launch of a new CBC website has provided to opportunity to ensure that everything is current and valid. The report lists all the documents being revoked, and those being retained will be publicly available on the new website

He thanked officers John Spurling and Daniel O'Neill for their hard work.

Members welcomed and supported the opportunity to tidy up and streamline planning guidance and documents, as planning is essential to the shaping of the town. They also made the following points:

- it is a constant bugbear that many on-line documents are not up to date or withdrawn when so longer needed – not just at CBC but also true of central government websites. This is a great initiative, particularly important as we enter an age of Gen AI, where people use that to ask questions rather than looking at the actual documents;
- SPGs and SPDs are really helpful in the planning process, and it is interesting to see what is being revoked, including the fire station and police station. Could these not automatically drop off the system once the particular scheme or building is complete?
- CBC is proactive in producing guidance notes, particularly the Climate Change SPD, which make a big difference. The planning team should be congratulated for being ahead of the game with this.

The Cabinet Member for Planning and Building Control thanked Members for the positive comments. He didn't know if guidance and documents are removed once a scheme is complete, and wondered if this is something that can be looked at across the council. He said he is a great advocate of benchmarking, and senior officers always use best practice from similar authorities to build on; this is why CBC is so successful in some of its initiatives.

RESOLVED THAT:

- 1. the list of SPGs, SPDs and the Urban Design Concept Statements informal guidance notes set out in Table 1 at paragraph 3.5 of this report are formally revoked and withdrawn from publication**

7 Policy Updates: Rent Setting, Voids, Recharge, Repairs

In introducing this item, the Cabinet Member for Housing and Customer Services said the reports are updates of earlier work, have been to Cabinet Housing Committee, and have incorporated tenants' comments and suggestions. All present the position statement as of now, with the exception of the Voids Policy. She invited the Head of Housing Services to provide a verbal update, and he summarised the situation as follows:

- the voids procedure used to be internal, but is now public for complete transparency;
- CBC inherited the challenge of a substantive build-up of empty properties, always a moving feast but where 30-40 voids a month are to be expected, the number is currently three times that at 120, with 179 termination tenancies at the end of November;
- this is being dealt with by splitting voids into major (kitchens, bathrooms, plastering, heating systems) and minor, which still often require a lot of work. Following procurement challenges in the past, the team now has three contractors in place to deal with major voids, so that the in-house team can focus on turning round minor voids. Of these, one is working particularly well, and of the 77 major voids at the end of November, 65 are with contractors and due back by the end of January – although more major voids are added and passed on to contractors each week;
- we had 179 additional properties this year, 28 of which were transfers of existing council tenants to another council property, thus creating another void. Numbers are always changing, but things are going well, particularly with one contractor which has freed up additional resource so been able to reduce the number of major voids we've got with them;
- this creates a slight challenge with lettings as we can only let so many properties each month – they need to be advertised on Homeseecker, followed by shortlisting, viewings, verification and frauds checks. It is a complicated process, in addition to the challenge of approximately 70 new builds in Regency Village, 30 of which are available to be let, so we are currently looking at resource in the letting area, to avoid the situation where we have a lot of voids back but it is taking too long to secure tenants.

He concluded that he is confident that numbers will come down early next year, but that a huge amount of work is needed to deal with the backlog.

The Cabinet Member for Housing and Customer Services said she and officers work closely to get the best results – decent homes for tenants, ensuring they have a voice, tackling voids, reorganising how work is done, and making sure contractors are up to do the job. She thanked officers for all they do.

Members welcomed the update and were pleased to note that the voids situation is improving and new properties are coming through to relieve housing pressures. They made the following observations:

- with a high turnover of one-bedroomed flats in St Mark's, could anything be done to encourage people to stay in the area when they move on from this type of accommodation?

- the clearly-written tenant versions of all the policies are excellent, helping people to clearly see their responsibilities;
- Cheltenham has one of the highest levels of social housing in Gloucestershire, and although CBH did a good job, bringing housing back in house is one of best decisions the council has ever made, providing the chance to look at whole thing - refresh, rewrite, and work with tenants;
- voids have been the biggest single issue, as empty properties bring no rent and become more dilapidated while housing lists grow, so prioritising voids and finding trustworthy contractors is challenging but vital, and the team is wished every success.

In response to a Member's question, the Head of Housing Services said there was an average of 24 terminations a month, with some tenants moving on to non-council properties and others needing larger council homes. Reasons for terminations are tracked, and generally seem to be down to nothing more than the cycle of life. Voids are adjusted every week, and working closely with Housing Options means that an emergency case or homeless family can be prioritised if needed.

The Cabinet Member for Housing and Customer Services said that not all councils are in a position to offer accommodation to homeless people, but that tenants are at the heart of everything we do. In addition, listening to tenants is helping, and if they tell us that work is not being done properly by contractors, this can be addressed, all helping with the vital work of getting properties back into use rather than sitting empty.

She wished everyone in the housing services team a very happy Christmas.

RESOLVED THAT:

- 1. the Rent Setting Policy (Appendix 2) is approved;**
- 2. the Recharge Policy (Appendix 5) is approved;**
- 3. the Empty Homes (Voids) Policy (Appendix 8) is approved;**
- 4. the Repairs and Maintenance for Tenanted Properties Policy (Appendix 11) is approved.**

8 Half-yearly Treasury Management Report

The Cabinet Member for Finance and Assets introduced the report, which was discussed at Full Council on Monday, saying it was a regulatory requirement to report and review the first six months of the financial year. He confirmed that general fund borrowing costs and investment returns are on target as forecast in the budget for 2025-26, a testament to the hard work of the team, and that CBC is insulated to some degree from volatility in relation to borrowings, having a decent amount on fixed rates, and that short-term borrowing is coming down.

A Member commented that it would be helpful to have a bit more explanation and narrative around the different descriptions of market volatility, to give context to people who are not experts in treasury management.

The Cabinet Member for Finance and Assets said it was difficult under the budgetary process to have a very descriptive narrative, but he could see that this would be useful and undertook to have a conversation with the team to provide more narrative and a more reader-friendly way of describing things.

RESOLVED THAT:

- **the contents of the summary report of the treasury management activity during the first six months of 2025/26 are noted.**

9 Quarterly Budget Monitoring Report, July-September

The Cabinet Member for Finance and Assets apologised for the late report, which he said shows how the council's finances stand at the end of November, and give a clear picture of where it is on track and where it is starting to see some pressures. At this stage, we are forecasting overspend of £564k by the end of the financial year, largely due to lower-than-expected income in a few areas, but there are some positives as well. Overall, this means we need to keep close eye on spending over next few months; if the position doesn't improve, we will call on reserves to balance the budget which would take the general balances below the level we want to hold. He added that some savings agreed for this year are also proving hard to deliver, and are being actively reviewed.

He said there is volatility and uncertainty in areas of the national economy even after the recent government budget announcements, and equally the pending local government reorganisation is having negative effect on resources and capacity; there is no government funding for this, and the impact organisationally is unavoidable and unforeseen.

He ended by thanking the finance and leadership teams for their hard work throughout the year.

A Member thanked the Cabinet Member for Finance and Assets for the report. He said it is disappointing that there will be an overspend and the council will be using reserves by the end of the year, but the report is open, explains what is going on and, he suggested, reserves exist to be spent when things don't go the way the financial strategy intended. This is good jurisprudence, and CBC is in a strong position despite all that is going on.

The Cabinet Member for Finance and Assets welcomed these comments and pointed out that this is a Quarter 2 overspend; he hoped not to be in the same position at the end of the year. A lot of work is going on in the background with the teams, making savings and adjustments as we move forward; he agreed that this is what reserves are there for but said there is not optimum level of reserves and he hoped that we don't have to use them. He concluded that budgets have been challenging over the last few years the council and finance team is doing all it can to keep everything on track.

The Leader added that it is important to remember that this is not the year-end report, and that it highlights the importance of budget monitoring reports to ensure a constant handle on CBC's finances at any moment in time.

RESOLVED THAT:

- **the contents of the report, including the key projected variances to the general fund and Housing Revenue Account (“HRA”) 2025/26 revenue and capital budgets approved by Council on 21 February 2025, and the actions to ensure overspends are reduced as far as possible by the end of the financial year, are noted.**

10 Interim Budget Proposals for General Fund and HRA

The Cabinet Member for Finance and Assets said that under normal circumstances, the Cabinet would be discussing the interim budget proposals at this meeting, which would then go out for consultation. However, after being presented with single-year settlements for many years, making long-term financial planning difficult, the incoming government is giving us a multi-year settlement which although welcome comes with some uncertainty. The companies that provide modelling and up-to-date, relevant information about the budget suggest there could be a difference of £2m in our budget alone, so rather than consult on a set of figures that may prove unreliable, we have opted to wait until after the government announces its figures, then work through those before going out to consultation, to ensure the best position and the best financial information. This is unfortunate but unavoidable and will require an additional Cabinet meeting but it is the right thing to do, to maintain openness and transparency.

The Leader confirmed that the settlement was originally promised for 30 November, but has now been pushed back to 17 December. She agreed that deferring this item to an extraordinary meeting on 23 December is not ideal but the right thing to do, allowing a few days to work out the impact it will have on our budget implications.

11 Briefing from Cabinet Members

The Leader invited Members to present their briefings.

The Cabinet Member for Climate Emergency shared the following:

- he presented his first report, on carbon emissions, to Council on Monday; it was well received, and will be used to move forward and improve our approach to Net Zero by 2030, as pledged in 2019;
- November has been a month of progress on our climate plan, including:
 - hosting the inspiring schools climate conference in the council chamber;
 - awarding over £35k in Cheltenham Zero grants to local businesses driving low carbon innovation;
 - advances in flood resilience work with an updated response plan now in place and community flood wardens joining the network;

- housing retrofit projects are moving forward, with work on 87 properties completed under the social housing decarbonisation fund scheme and plans for low carbon heating well under way.

The Cabinet Member for Waste, Recycling, Parks, Gardens and Green Open Space briefed on three items:

- Cheltenham's 'friends' groups are massively important, engaging with communities, making a real difference and saving the council money; a new one recently held its first event at Newcourt Green in Charlton Park, and the new Roamers Group is also working well;
- he is meeting with bereavement services to consider direct cremations and green burials and how to work down some of the deficit we currently have on revenue to offer a new service;
- street cleaning is moving forward, with most roads cleared of leaves, many others to be done before the end of year, and the remainder in January and February. This requires a lot of coordination with the county, including signage, car removal and drainage works, so although the situation is not great in some areas, residents can be assured that the council is working on it.

The Cabinet Member for Finance and Assets said all had paid tribute the Deputy Chief Executive Paul Jones at Council on Monday, and a later agenda item approved the appointment of a new S151 officer, which the council is legally required to have. He thanked the Chief Executive, Leader and all the finance team for their work, and said that every meeting without Paul is difficult.

The Cabinet Member for Housing and Customer Services shared several items:

- she enjoyed a visit to Riding for the Disabled in Cheltenham, to help distribute some of the nearly 900 selection boxes collected by Citizen of Honour David Bath for children in Cheltenham. She said that he and housing officers have done great job raising cash and providing the selection boxes, and thanked them and all officers for their help;
- work has started at Saracens and The Hub, with piling work finished today;
- she met two new staff members today, and is looking forward to working with them and others in the year ahead;
- she was in Malta last week, with the Local Government Association, and as always, it was a privilege to be able to share what CBC doing as a commercial council, bringing housing back in house to make it better and working with all Cheltenham communities to improve people's lives. She is looking forward to next year's formal meeting in June, which will take place at Father Christmas's official residence in the Arctic Circle;
- she has been visiting various locations Cheltenham, talking to tenants, seeing their flats and houses, including Barlow Road where new pipes are now being fitted. Tomorrow she will visit sheltered housing accommodation at Wallace House to meet residents;
- a number of policies are coming forward, including domestic abuse work, and preparation for the regulator;
- she has been designated the person responsible for housing complaints, so has attended a meeting in Leeds, and will meet the ombudsman on line on 19

January. This is good, and pertinent to providing the best possible homes for our residents.

For clarity, the Leader pointed out that visit to the Arctic Circle is part of the Cabinet Member's role in the Local Government Association, and will not be financed by CBC.

The Cabinet Member for Economic Development, Culture, Wellbeing and Public Realm had been busy as always and had several items to share:

- a positive meeting with County Councillor Joe Harris and the Civic Society, to share developing plans for the town centre public realm. The council is working hard to deliver long-term results, of which we can be proud;
- together with Richard Gibson (Head of Communities, Wellbeing and Partnership), a meeting with Smith's Rugby and the RFU to see what funding opportunities there are to help the club continue to grow; and with Cabinet Member for Waste and Recycling, Parks, Gardens and Green Open Space, a meeting with Leckhampton Rovers for a regular check-in and discussion about areas of town where we can develop football and improve pitches;
- a meeting with Harriers Athletic Club and the BBC to reaffirm CBC's position on resurfacing the Prince of Wales stadium's athletics track to get it back to the standard required for 8-9 high-level events a year. This is a £600k project and cannot be delivered immediately due to financial pressures, but he hopes CIL regional funding might help, particularly as this is a regionally important site, not used exclusively by Cheltenham residents;
- a regular meeting with Cotswold Plus LVEP (local visitor economy partnership), which brings together councils in the county and beyond to collaborate on tourism and visitor economy matters and is always positive;
- a meeting with Tony from Lansdown Arts Studios, with a tour of the building and site to provide a better understanding of what the artists do there and the amazing art they create;
- with the Marketing Cheltenham team, a meeting with the English Symphony Orchestra, to offer the council's support in growing classical music in Cheltenham, including various residences at the Town Hall;
- together with the Deputy Mayor, Councillor Horwood, the opening of the ice rink. Thanks to the Marketing Cheltenham team for delivering this again, open every day until 04 January, and providing many different types of sessions for everyone and a great opportunity to come to town and have some fun.

Finally, he reminded everyone that there is lots going on in Cheltenham for residents and visitors between now and the new year, with pantomimes at the Everyman and the Playhouse, and also the Pittville Pump Room pop-up café, open from 22-31 December, with live music - a great place to go with the family.

The Cabinet Member for Major Developments and Housing Delivery was happy to report on the latest progress at 320 Swindon Road, where much-needed affordable housing is being built on a disused car park. She said recent work has focussed on foundations and drainage, and levelling the site out for expensive vehicles to start work in the new year. She said on-site work will break from 19 December, to avoid

any disturbance to local residents, but that drainage work on the adjacent Malvern Street will be complete by Christmas.

She added that she was delighted to hear officer comments earlier in the meeting about residents moving into the affordable homes at Regents Village, particularly wonderful at this time of year, and with the promise of many beautiful new homes being completed and ready for families to move into in 2026.

The Cabinet Member for Safety and Communities had a number of items to share:

- huge thanks to officers and Gloucestershire Constabulary for the strong and effective partnership work on the Safer Streets summer campaign - their joint efforts have resulted in a 5% reduction of reported crime in identified town centre hotspots;
- thanks to all the young people she has been privileged to meet in the past month, together with Geraldine, a No Child Left Behind officer – at youth groups in Whaddon, Springbank, Hatherley and St Peter's. They have provided valuable insight as to what they want from the proposed new Cheltenham Youth Pass, including a more affordable and accessible choice of activities in the town centre, which will make sure we have the right conversations with activity and hospitality providers, and that hospitality in Cheltenham to get the best deals;
- there are also exciting developments coming forward in the new year, with a potential venue identified for a youth cafe – a safe, accessible town centre place that young people can call their own;
- she has an important meeting coming up with the accessibility forum, during which she will go on a night walk wearing simulation glasses to understand how difficult it can be to navigate the town centre with a visual impairment. This will help the council do its best to make sure the town is as accessible as possible;
- thanks to the licensing team for their great efforts in putting together this year's Purple Flag survey, with important feedback from residents and visitors about their experience of the town centre. Cheltenham has been awarded accreditation for ten consecutive years, but is only as good as the previous year, and needs feedback to ensure the town continues to be lively and safe. The survey ends on 09 January 2026;
- finally, she also wanted to congratulate community hero Dave Bath for his fantastic work providing selection boxes for children and young people, and to thank all partners, individuals and the council for their contributions, which have a huge impact across Cheltenham.

The Cabinet Member for Planning and Building Control had no exciting news to share, but thanked planning and building control officers, and also the comms team with whom he works closely, for their hard work and commitment throughout the year.

The Leader said she was lucky to have attended the press night of the Playhouse pantomime, which she described as magnificent – professional, full of good humour, affordable, and involving many young people – and said her grandson particularly enjoyed it. Apart from this, she said much of her time is spent working through Local Government Reform and planning reforms.

All Cabinet Members thanked their officers, colleagues and partners for all their hard work and collaborative spirit, and wished them all a very merry Christmas and a happy new year.

12 Cabinet Member decisions since last meeting

Members reported the following decisions taken since the last meeting:

1. [To award a contract to Gloucestershire Action for Refugees and Asylum Seekers \(GARAS\)](#)
Cabinet Member for Safety and Communities, Councillor Victoria Atherstone
2. [Approval of the award of grant funding for the Cheltenham Playhouse Theatre](#)
Cabinet Member for Economic Development, Culture, Wellbeing and Public Realm, Councillor Izaak Tailford

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Cheltenham Borough Council

Cabinet

Minutes

Meeting date: 23 December 2025

Meeting time: 12.00 pm - 12.25 pm

In attendance:

Councillors:

Paul Baker, Mike Collins, Rowena Hay, Peter Jeffries, Izaac Tailford and Richard Pineger

Also in attendance:

Claire Hughes (Director of Governance, Housing and Communities) and Gareth Edmundson (Chief Executive)

1 Apologies

Apologies were received from Councillors Atherstone, Clucas and Lewis.

2 Declarations of interest

There were none.

3 Minutes of the last meeting

The minutes of the Cabinet meeting held on 16 December will be approved at the next meeting.

4 Public and Member Questions and Petitions

There were none.

5 General Fund Revenue and Capital – Interim Budget Proposals 2026/27 for Consultation

The Cabinet Member for Finance and Assets apologised for the delay in bringing this item, which he said was due to the late government settlement and necessary

adjustments to the funding formula resulting in a huge amount of work for the finance team. He highlighted the following points:

- we are witnessing the transfer of the burden of funding local government to local tax payers - in some ways a good thing, but coming with many limitations and less freedom than we would like;
- the three-year settlement is welcome but a double-edged sword, effectively a real-terms funding cut, in addition to which the potential cost of local government reorganisation - likely to be around £2m – cannot be factored into the budget;
- all reports, and the Q2 figures, point to £1.171m being required to balance the budget. A whole host of reviews will be underway in the coming weeks to close the gap, with protection of front-line services and our most vulnerable residents the main priority, as always. It will be a challenge, but we have faced and overcome similar challenges before.

Members thanked the excellent finance team and Cabinet Member for all their hard work in getting the report ready in such a short time and in such difficult circumstances, and made the following comments:

- it is disappointing that the government has published these figures so late, and appalling that funding is being cut when costs are going up, placing a greater burden and challenges on local authorities – CBC is a well-run council but others will struggle;
- the thoughts of residents and partners will be welcome - it is important that they engage with their town and council - to be followed in the new year by discussions on how we can protect and support our mandatory and discretionary services and work;
- it is noted that CBC is proposing a council tax increase of 2.99%, well below the maximum 5.99% it could charge. It is frustrating to read online comments which suggest that residents are being charged more and services are being cut, but this is not the case – CBC is not proposing the maximum increase, is not cutting any statutory services, and will hopefully be able to maintain its many discretionary services through this budget. It will be interesting to see what comes back from the consultation.

The Cabinet Member for Finance and Assets confirmed that the three-year settlement is transferring the cost of local government to councils, with 75% of estimated income coming from local taxation. The reduction in government funding means that the only way to protect local services is to put up council tax, but CBC's increase is capped at 2.99% and would require a referendum to raise it any higher.

Members made further comments as follows:

- these are really challenging times for officers and Cabinet Members, with so many issues to consider, not least the last-minute nature of the settlement which would not be contemplated in the business world;
- with the year-on-year reduction in government funding, CBC income will be reduced by £1.4m over three years, and with council tax increase capped at 2.99%, we are yet again looking for ways to protect and save frontline services;

- engagement and consultation will help inform our decisions in setting the budget, and Cabinet Members will have to discuss with officers where any cuts can be made, rather than looking at ways to grow and invest as they would like to do. There is a lot of hard work ahead, but CBC can hopefully continue with its great record here, with creative accountancy and thinking outside the box;
- we are all concerned about the need to find a potential £1-2m for local government reorganisation from our own budget over the next two years, and in addition, many residents are worried about any additional tax or levy they may have to pay for a future town or parish council;
- it seems that CBC is being punished for being a progressive, business-orientated council which has done well over the last 20 years, and it will have to use its abilities and intelligence to rebuild and remain as successful.

In response to a Member's question about the fact that local government finance is cut every year and when this started, the Cabinet Member for Finance and Assets said there seems to be a continuing cycle of reorganisation and re-assessing finances, started by the previous government and continued with the current one. He added that it seems ludicrous that the government will make the decision about local government reorganisation but is not going to pay for it.

Thanking Members for their comments, he said it should be made very clear that cuts to services are not being proposed – it is all about balancing the budget. The reduction in government funding always comes with the presumption that council tax can and will be raised, and while as a liberal democrat council we always find a way to balance the budget and invest in the town, the government is limiting our ability to do this.

The Leader added the following comments:

- in the past, we had growth budgets, but where these still exist they are a necessity, and do not provide any opportunity to deliver on ambition;
- in 2016, it was realised that CBC could no longer rely on council tax income, and the decision was made to become a 'commercial council', investing in the town and a diverse property portfolio within a five-mile radius. Without this, we would not be in our current strong position; the legal obligation to bring in a balanced budget has been addressed by realigning our priorities rather than cutting services. We have undoubtedly had to make cuts over the years – this is one of the reasons why Cheltenham Trust was created, to deliver non-statutory, discretionary services which we have always worked so hard to protect - but with our commercial mindset, we have not been afraid to take hard decisions;
- the three-year settlement has been badged as 'fairer funding' but it feels that some authorities are getting huge increases while others, including those in the south-west and London, do not come off well.

The Cabinet Member for Finance and Assets thanked Members for their comments, and the finance and leadership teams for their hard work in these challenging and unusual times.

RESOLVED THAT:

1. the interim budget proposals for consultation are approved, including a council tax increase of 2.99% for 2026-27, in line with the Local Government Provisional Finance Settlement;
2. the growth proposals at Appendix 3 are approved;
3. the proposed capital programme at Appendix 5 is approved;
4. the Leadership Team is tasked with developing proposals to balance the 2026/27 budget;
5. consultation responses will be sought by 31 January 2026.

6 Briefing from Cabinet Members

There were no updates on this occasion.

7 Cabinet Member decisions since the last meeting

Two Members presented decisions taken since the previous meeting on 16 December:

- i. [Renewal of lease at St James Car Park](#)
Cabinet Member for Finance and Assets, Councillor Peter Jeffries
- ii. [To award a contract to Smith's \(Gloucester\) Ltd](#)
Cabinet Member for Waste and Recycling, Parks, Gardens and Green Open Space, Councillor Paul Baker

Cheltenham Borough Council

Cabinet – 24 February 2026

Domestic Abuse Policy and implementation of the Gloucestershire Domestic Abuse Strategy in Cheltenham

Accountable member:

Councillor Victoria Atherstone, Cabinet Member for Safety and Communities

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

Domestic abuse remains a significant societal issue, affecting 2.3 million adults annually in England and Wales, with severe human and economic impacts.

The council is proposing to adopt a Domestic Abuse Policy that sets out how it will deliver against its statutory duties to safeguard tenants, staff, and elected members and to provide safe housing and workplace environments.

The proposed policy is aligned to the Gloucestershire Domestic Abuse Strategy 2025–2028 and recommendations set out that a Cheltenham plan will be developed to support its local implementation.

Recommendations: That Cabinet:

- 1. adopts the Domestic Abuse Policy**
 - 2. agrees that the Council will seek Domestic Abuse Housing Alliance (DAHA) Accreditation**
 - 3. delegates authority to the Cabinet Member for Safety and Communities and the Cabinet Member for Housing and Customer Services in consultation with the Director for Governance, Housing and Communities to amend the housing and homelessness policy as relates to Domestic Abuse as appropriate in light of developing best practice.**
 - 4. notes the proposal in appendix 3 for the creation of a partnership plan to support local implementation of the Gloucestershire Domestic Abuse Strategy 2025-2028**
-

1. Implications**1.1 Financial, Property and Asset implications**

To undertake the accreditation the Council will need to become a member of the Domestic Abuse Housing alliance at a cost of £2,975 per year (for 2025-26 - currently awaiting next year's fee to be confirmed). As accreditation is likely to take 12-18 months the Council would need to budget initially for two years fees. It could then review on an annual basis. There is currently no specific budget allocated to cover the accreditation fee and therefore the cost will need be found from the existing budget set for 2026/27.

Signed off by: Jon Coldridge, HRA Accountant, jon.coldridge@cheltenham.gov.uk

1.2 Legal implications

The Council's activities to support survivors and victims of domestic abuse are supported primarily by the following legislation:

The Housing Act 1996, which established it is not reasonable for a person to continue to occupy accommodation if it is probable that this will lead to violence or domestic abuse against them or someone with whom they usually reside or might reasonably be expected to reside.

The Homelessness Reduction Act 2017, which sets out the Council's new duties to prevent and relieve homelessness.

The Domestic Abuse Act 2021, which sets out the new definition of domestic abuse and established that people made homeless due to being a victim of domestic abuse have an automatic priority need for homelessness assistance.

Approving the policy will contribute towards the discharge of the Council's statutory duties.

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

1.3 Environmental and climate change implications

There are no associated environmental and climate change implications in relation to this report and sign off.

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

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Quality homes, safe and strong communities
- Reducing inequalities, supporting better outcomes

1.5 Equality, Diversity and Inclusion Implications

The Council's Domestic Abuse Policy, and associated training, follows best practice guidance. This training and guidance addresses issues including race, culture, disability, sexuality, gender, religion and age ensuring the Council applies the policy without prejudice or discrimination. By its nature the policy supports the Council in its public sector equality duty by ensuring Council services are safe for all its communities. See Appendix 2 for full assessment.

2 Background

2.4 Domestic abuse is an issue that is prevalent throughout our society, the Crime Survey for England and Wales estimated that 2.3 million people aged 16 years and over (1.6 million women and 712,000 men) experienced domestic abuse in year ending (YE) March 2024. It impacts both the physical and emotional safety of adults and children. There were 108 domestic homicides in the year ending March 2024 nationally, of these, 83 were women and 25 were men; 66 of these victims (64%) were killed by a partner or ex-partner.

2.5 In addition to the devastating human impact, it also has a significant economic impact with an estimated £1.3 billion being spent on services that both respond to and support victims, perpetrators and communities. It is acknowledged that workplaces have a significant role to play in tackling domestic abuse as they offer a place where people are outside of the home environment and can gain support

and advice without the fear of being overheard. And as with other risks to employee safety, employers have statutory duties to mitigate risks posed by domestic abuse and put controls in place so that employees can carry out their role safely.

2.6 Although domestic abuse is addressed in the Council's Safeguarding policy, with the reintegration of housing services there is a need for a separate Domestic Abuse Policy that covers the Council's duties to its tenants, as well as its staff and elected members.

2.7 The Gloucestershire Domestic Abuse Strategy was adopted by the Council via delegated authority in October 2025. This strategy outlines some key actions for the Council and its partners including the creation of a local implementation plan, that will set out how the council will achieve DAHA accreditation and make progress in terms of tackling misogyny, support for children and young people, honour-based abuse, forced marriage, child-to-parent abuse and working with businesses to ensure appropriate workplace policies.

3 Reasons for recommendations

3.4 The policy sets out that the Council will treat all reports of domestic abuse within its housing stock as a high priority, ensuring trained staff follow established protocols and refer victims to specialist agencies for support. Tenants can report abuse through multiple confidential channels and safe communication methods tailored to individual circumstances. Housing staff actively work with tenants who are victims of domestic abuse to signpost and where appropriate, make referrals to services such as Gloucestershire Domestic Abuse Support Service (GDASS) and other wraparound support, including mental health and substance misuse services.

3.5 The Council offers advice to victims in terms of their housing situation including support if they wish to remain safely in their current home or alternative accommodation options if they do not. The Council's housing service participates in Multi-Agency Risk Assessment Conference (MARAC) processes to manage risk and works with partners to develop action plans.

3.6 The policy sets out that the Council will prioritise the safety and wishes of victims when addressing cases involving tenant perpetrators of domestic abuse. The Council uses enforcement powers under the Housing Act to hold perpetrators accountable, which may include tenancy enforcement actions such as removing perpetrators from joint or sole tenancies or recovering possession of a property for domestic abuse-related offences. These measures are only taken where it is safe and appropriate, ensuring that victim risk is not increased.

3.7 In addition to enforcement, the policy recognises that long-term prevention

requires behavioural change. Where perpetrators acknowledge their behaviour and seek support, the Council will consider referrals to specialist intervention programs aimed at positive engagement and reducing harm. This dual approach combining accountability with opportunities for rehabilitation supports both immediate safety and sustainable prevention of domestic abuse within council housing.

- 3.8 DAHA accreditation is awarded by the Domestic Abuse Housing Alliance and is the UK's benchmark for housing providers in addressing domestic abuse. It establishes a formal framework guiding housing teams to implement survivor-centred policies, staff training, and risk management procedures, ensuring effective identification and intervention in abusive situations. The accreditation is recognised in national strategies and guidelines, as well as in the local Gloucestershire Domestic Abuse Strategy. The accreditation requires organisations to work across eight priority areas, including partnership collaboration, inclusive practice, perpetrator accountability, and public awareness, typically over a 12–18 month period.
- 3.9 Achieving DAHA accreditation demonstrates a housing provider's commitment to safeguarding survivors, promoting organisational best practice, and fostering confidence among residents and communities. It also embeds a preventative and trauma-informed approach that enhances the overall safety and effectiveness of housing and homelessness services. The accreditation can be achieved at three levels; bronze, silver and gold.
- 3.10 Gloucestershire Housing Partnership has received funding from Gloucestershire County Council to employ a full-time officer to support organisations and statutory partners to achieve accreditation, with the aim for the worker to be in post by April 2026. The worker will support Council staff to achieve the accreditation through sharing best practise and providing support to achieve the accreditation at each level.
- 3.11 To undertake the accreditation the Council would need to become a member of the Domestic Abuse Housing Alliance at a cost of £2,975 per year (25/26 costs awaiting next years). As accreditation is likely to take 12-18 months so the Council would need to budget initially for two years fees. It could then be reviewed on an annual basis.
- 3.12 The policy highlights the Council's approach to support staff or elected members in relation to domestic abuse. Human Resources will use their internal guidelines to support staff who are experiencing domestics abuse. As well as victims of abuse it is statistically likely that some employees will be perpetrators, this will also be dealt with via Human Resources internal guidance. Human Resources will use the LGA guidance for managers and employees to inform their internal practice.

- 3.13 The policy requires specific domestic abuse training to be available to employees and elected members. Once the policy has been approved a pathway of training will be launched that includes the Council's requirement around both safeguarding and domestic abuse, so that they complement each other. The training pathway will have different levels and types of training depending on the needs of the employee's and members' job role and position.
- 3.14 Due to the inter-related nature of domestic abuse and safeguarding, it is proposed that senior officers, elected member advocates, designated officers and HR leads, who are nominated to support the safeguarding policy also support the domestic abuse policy. This is reflected in the responsibilities section which mirrors the responsibilities in the Council's Safeguarding Policy. This will allow a joined-up approach to the issues and increase the knowledge and capacity of key individuals within the organisation. Domestic Abuse will also form part of the agenda at the Corporate Safeguarding Group that has been established under the Corporate Safeguarding Policy.
- 3.15 The Gloucestershire Domestic Abuse strategy 2025-2028 builds on the achievements of the 2021–2024 plan and sets out a countywide vision aligning with statutory duties under the Domestic Abuse Act 2021 and the Victims and Prisoners Act 2024 to ensure everyone in Gloucestershire can live free from abuse and harm. Developed by the Gloucestershire Domestic Abuse Local Partnership Board, the strategy emphasises prevention, early intervention, and coordinated multi-agency responses. It acknowledges domestic abuse as a gendered crime that disproportionately affects women and girls, while recognising its impact on all genders. The approach includes raising awareness, improving access to safe accommodation and support services, and strengthening safeguarding for victims and their children.
- 3.16 Through the Cabinet member for Safety and Communities delegated authority, the Council signed up to the County strategy in October 2025. One of the key aspects of the plan is that the Council supports the local implementation of the strategy through a place-based plan. It is proposed this will be undertaken through the Communities Partnership as the Council's statutory community safety partnership. An initial proposal for development of the implementation plan is attached in **appendix 2**. The proposal is inclusive of a wide variety of partnership across all sectors in Cheltenham to ensure the most effective delivery and a whole town approach to tackling domestic abuse and associated issues.

4 Alternative options considered

- 4.4 The Council already has an established Safeguarding Policy including support for domestic abuse so considerations were explored to not have a separate DA policy. However now the Council incorporates housing services and to ensure it complies with the Neighbourhood and Consumer Standard of the Housing

Consumer Standards it is necessary to have a separate DA policy.

4.5 The Council could proceed with the policy and implementation of the Gloucestershire Domestic Abuse Strategy at a local level without seeking DAHA accreditation. However, as housing services have only recently come back into the Council this would be a good time to benchmark our practice against national standards to ensure we are providing the most effective and safe service to housing tenants. The accreditation will also support the whole Council to improve and embed its response to domestic abuse both internally and in the community.

5 Consultation and feedback

5.4 Internally, consultation has been carried out with relevant council officers including those responsible for homelessness support, human resources and tenancy management.

5.5 Externally, consultation has been undertaken with Gloucestershire's housing partners and with Chairs and co-ordinators of partnership groups that have been identified through the development of the local plan to support the Council in its local implementation of the County strategy.

6 Key risks

6.4 If the Council does not implement a clear Domestic Abuse Policy, employees and elected members may face increased risk of harm when dealing with disclosures or interacting with perpetrators. Without proper training and safety protocols, individuals could be exposed to threatening situations, emotional distress, and reputational damage for the Council due to failure to meet its statutory duty of care under health and safety legislation.

6.5 Failure to implement clear domestic abuse support and protocols leaves tenants vulnerable to ongoing abuse without effective support or intervention. This could result in serious harm, legal challenges for the Council under the Domestic Abuse Act 2021 and Housing Act 1996, and reputational damage for failing to safeguard residents in its housing stock.

6.6 Without a coordinated approach and partnership plan, the Council risks fragmented responses that miss opportunities for early intervention. This can lead to escalating harm, increased homelessness, and higher demand on crisis services, undermining statutory obligations and the Council's credibility in delivering the Gloucestershire Domestic Abuse Strategy.

Report authors:

Tracy Brown Safeguarding and Partnership Manager

tracy.brown@cheltenham.gov.uk

Amanda Wray CBC Housing Services Safeguarding and EDI Manager

amanda.wray@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment
- iii. Domestic Abuse Support Policy
- iv. Partnership plan to support implementation of the Gloucestershire Domestic Abuse Strategy 2025-2028

Background information:

Gloucestershire Domestic Abuse Strategy 2025-2028

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 effectively safeguard staff from domestic abuse in the workplace it may lead to harm to staff and the Council not fulfilling its workplace health and safety duties	Claire Hughes	2	4	8	reduce	Implementation of the workplace and tenants domestic abuse support policy Training for staff in domestic abuse relevant to their role Establishment of the corporate safeguarding group	Tracy Brown /Amanada Wray Learning and development team Tracy Brown	March 2026 September 2026 February 2026
	If the Council does not effectively safeguard its tenants from domestic abuse it could result in serious harm to a tenant and the Council breaching its duties under the Domestic Abuse Act 2021 and Housing Act 1996	Caroline Walker	3	4	12	reduce	Implementation of the workplace and tenants domestic abuse support policy Training for staff in domestic abuse relevant to their housing role Establishment of the corporate	Tracy Brown /Amanada Wray Learning and development team Tracy Brown	March 2026 September 2026 February 2026

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
							safeguarding group Baseline current practice against DAHA accreditation to produce a priority action plan	Tracy Brown /Amanada Wray	May 2026
	If the Council does not provide joined up support at the earliest opportunity it may result in an increased need for crisis support that may involve greater harm to individuals and/or greater costs to the services	Claire Hughes	2	3	6	reduce	Implementation of the workplace and tenants domestic abuse support policy Training for staff in domestic abuse relevant to their role Establishment of the corporate safeguarding group Ensure links between the Council and other partnerships to ensure joined up early support As related policies	Tracy Brown /Amanada Wray Learning and development team Tracy Brown Members of the corporate safeguarding group Members of	March 2026 September 2026 February 2026 Ongoing Ongoing

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
							are reviewed ensure domestic abuse is considered and best practice kept up to date	the corporate safeguarding group	

Appendix 2: Equality Impact Assessment (Screening)

STAGE 1 – Equality Screening

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

a. Person responsible for this EqlA

Officer responsible: Tracy Brown/Amanda Wray	Service Area: Communities
Title: CBC Housing Safeguarding and Equality Diversity and Inclusion manager	Date of assessment: 10/10/2025
Signature:	

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

If other, please specify:

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

CBC Workplace and Tenants Domestic Abuse Support Policy

Is this new or existing?	Already exists and is being reviewed
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Please specify reason for change or development of policy, function, strategy, service change or project

Policy has been reviewed as part of a wider service improvement and expansion and in line with the consumer standards requirement.

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

Purpose:	The purpose of the updated Workplace and Tenant Domestic Abuse Support Policy is to set out a clear and consistent approach to domestic abuse across all Council services. It ensures that employees, elected members, volunteers, contractors, and commissioned providers understand their responsibilities and act appropriately to protect those at risk.
Aims:	<p>The aim of the Domestic Abuse Policy is to ensure the safety of tenants, residents, staff and elected members who may be affected by domestic abuse.</p> <ul style="list-style-type: none"> • Our employees and members are confident to recognise and appropriately respond to domestic abuse by providing appropriate domestic abuse training for all employees and elected members. • We work together across council services and partner agencies to provide a co-ordinated community response to domestic abuse as it requires a multi - agency response to best support those affected. • We strive towards providing a trauma-informed response. • Empowering victims by building trust and working in collaboration to meet their needs.

	<ul style="list-style-type: none"> • We take a zero-tolerance approach to domestic abuse and will hold perpetrators of abuse to account while ensuring victims safety. • We are honest and transparent with the guidance, help and options available to those affected by domestic abuse. • We will reflect the Council’s equality and diversity policy in the delivery of this DA policy including being aware of how a person’s experience of domestic abuse may be impacted by their protected characteristics.
Outcomes:	<p>The outcomes of the updated policy are as follows:</p> <ul style="list-style-type: none"> • Council elected members, staff, volunteers understand their roles and responsibilities in domestic abuse. • Tenants experiencing domestic abuse are supported. • Staff and elected members are trained to understand and respond to domestic abuse. • Staff and elected member are safeguarded in the workplace in terms of domestic abuse. • Council services are joined up and offer support at the earliest opportunity to those experiencing domestic abuse.
Who benefits:	<p>The updated policy will benefit the following:</p> <ul style="list-style-type: none"> • Council elected members, staff, volunteers • Individuals who come into contact with Council services • Tenants of the Council • The wider community of Cheltenham

e. What are the expected impacts?

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

Please provide an explanation for your answer:

The updated safeguarding policy will have the following impacts on people:

- Children, young people, and adults who are experiencing domestic abuse will be offered support by appropriate services.
- Increased awareness and training for elected members, staff, volunteers on domestic abuse.
- Encourages a culture of vigilance and responsibility across all services.
- Ensures consistent, joined-up responses to domestic abuse concerns.
- Clarifies roles and responsibilities for staff, elected members, volunteers, and partners in relation to domestic abuse.

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

f. Identify next steps as appropriate

Stage Two required	Yes
Owner of Stage Two assessment	Tracy Brown / Amanda Wray
Completion date for Stage Two assessment	19/12/25

STAGE 2 – Full Equality Impact Assessment**2. Engagement and consultation**

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

a. Research and evidence

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

The Council has engaged with wide range of groups to help shape the Workplace and Tenant Domestic Abuse Support Policy.

Internal staff consultation

- Housing Officers and Managers: To understand safeguarding concerns arising in tenancy management, homelessness, and supported housing.
- Community Services Teams: To gather insights on vulnerable groups and safeguarding risks in public spaces and events.
- Safeguarding Leads: To ensure alignment with statutory duties and best practice.

Community Engagement

- Public Surveys or Focus Groups: Targeting residents, especially those from vulnerable or underrepresented groups (e.g. older adults, disabled people, ethnic minorities).
- Tenant Forums and Housing Associations: To gather feedback from social housing tenants and those with lived experience of domestic abuse and safeguarding issues.

In addition, the council has reviewed data and evidence including:

- Domestic abuse referral data
- Housing complaints and tenancy breaches
- Community safety reports

b. Consultation

Has any consultation been conducted?

Yes

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

Consultation and Ongoing Engagement

In addition to formal consultations with internal teams and community stakeholders as set out above, ongoing engagement is maintained through participation in a range of multi-agency partnership boards. These include:

- Gloucestershire Domestic Abuse Champions Network
- Cheltenham Violence against Women and Girls group
- Safer Gloucestershire
- District Safeguarding Network
- Cheltenham's Community Partnership

Regular attendance at these boards enables the council to stay up to date with emerging domestic abuse, procedures, and best practices. More importantly, it provides a platform to hear and reflect on the lived experiences of individuals from diverse and marginalised communities.

This insight is vital in shaping how the council responds to the safeguarding needs of vulnerable groups across housing, community services, and wider council functions.

This collaborative approach ensures that the policy remains responsive, inclusive, and aligned with individual specific needs, particularly in areas such as tenancy support, homelessness prevention, mental health, and equality.

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Positive and negative	<ul style="list-style-type: none"> Protects vulnerable older adults from domestic abuse. Promotes age-appropriate safeguarding responses and services. But risks of barriers to reporting concerns – such as sensory, dementia, lack of awareness of domestic abuse. 	<ul style="list-style-type: none"> Ensure older adults who may face barriers in accessing digital reporting have other options – such as tenancy management and Housing Support officer engagement. Raise awareness in hubs and sheltered schemes by providing sessions that explore and advise around specific domestic abuse issues for older people.
	Younger People (16-25)	Positive	<ul style="list-style-type: none"> Protects young people from domestic abuse. Promotes age-appropriate safeguarding responses and services. 	
	Children (0-16)	Positive	<ul style="list-style-type: none"> Protects children and young people from the impact of domestic abuse. Promotes age-appropriate safeguarding responses and services. 	
DISABILITY A definition of disability under the Equality Act 2010 is available here . <i>See also carer responsibilities under other considerations.</i>	Physical disability	Positive and negative	<ul style="list-style-type: none"> Recognises vulnerability of people with physical disabilities. Encourages accessible safeguarding procedures and communication methods. Policy links to safeguarding policy that includes safeguarding for adults with care and support needs, which often includes those with physical or learning disabilities. Recognition of discriminatory abuse and institutional abuse. Risk of underreporting due to communication barriers or lack of accessible reporting tools. 	Offer safeguarding reporting through: <ul style="list-style-type: none"> Phone (including text relay services) Email Online forms (with screen reader compatibility) In-person at council offices or community hubs Ensure these are clearly advertised and easy to access.
	Sensory Impairment (sight, hearing)	Positive and negative	<ul style="list-style-type: none"> Recognises vulnerability of people with sensory disabilities. Encourages accessible safeguarding procedures and communication methods. Risk of underreporting due to communication barriers or lack of accessible reporting tools. 	<ul style="list-style-type: none"> Make available accessible formats for reporting: Easy Read version, Braille, British Sign Language.
	Mental health	Positive and negative	<ul style="list-style-type: none"> Recognises vulnerability of people with mental health disabilities. 	Continue to strengthen relationships with Mental Health services and Health professionals.

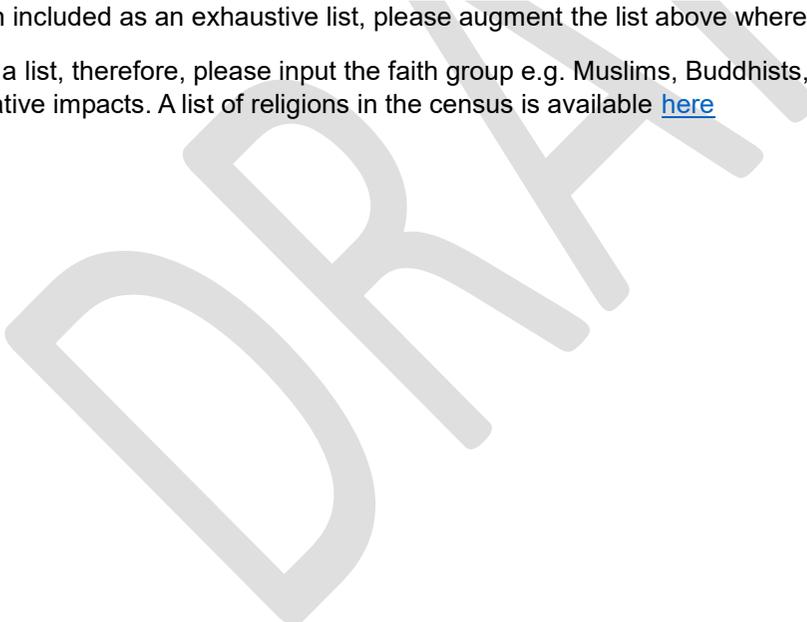
			<ul style="list-style-type: none"> • Encourages accessible safeguarding procedures and communication methods. • Good partnership working with Mental Health services. • Risk of underreporting due to communication barriers or lack of accessible reporting tools. 	
	Learning Disability	Positive and negative	<ul style="list-style-type: none"> • Recognises vulnerability of people with learning disabilities. • Encourages accessible safeguarding procedures and communication methods. • Risk of underreporting due to communication barriers or lack of accessible reporting tools. 	Engage with Community investment, CBC Employment and Life skills team and Building circles project to encourage reporting.
GENDER REASSIGNMENT		Neutral	<ul style="list-style-type: none"> • No foreseen differential impact on people who are changing genders 	Having clear information and procedures in place regarding Hate Crime and Hate incidents, including guidance and support options.
MARRIAGE & CIVIL PARTNERSHIP	Women	Positive	<ul style="list-style-type: none"> • Supports individuals experiencing domestic abuse within any partnership. 	
	Men	Positive	<ul style="list-style-type: none"> • Supports individuals experiencing domestic abuse within any partnership. 	
	Lesbians	Positive and negative	<ul style="list-style-type: none"> • Supports individuals experiencing domestic abuse within any partnership. • But there is a risk that domestic abuse risks in non-traditional relationships are overlooked 	Ensure appropriate training is in place for staff and elected members
	Gay Men	Positive and negative	<ul style="list-style-type: none"> • Supports individuals experiencing domestic abuse within any legal partnership. • But there is a risk that domestic abuse risks in non-traditional relationships are overlooked 	Ensure appropriate training is in place for staff and elected members
PREGNANCY & MATERNITY	Women	Positive	<ul style="list-style-type: none"> • The policy links to the CBC Safeguarding policy which includes unborn children in child protection concerns. 	

			<ul style="list-style-type: none"> Staff are advised to consider risks to pregnant individuals in domestic abuse disclosures. 	
RACE* Further information on the breakdown below each of these headings, is available here . For example Asian, includes Chinese, Pakistani and Indian etc	White	Neutral	<ul style="list-style-type: none"> No foreseen differential impact 	
	Mixed or multiple ethnic groups	Positive and negative	<ul style="list-style-type: none"> Recognition of discriminatory abuse including racism and culturally motivated harm (e.g. honour-based violence, FGM, forced marriage). Requirement for partner organisations to align with CBC safeguarding standards. But recognising language barriers or culturally sensitive domestic abuse and safeguarding approaches. Risk of under-reporting in communities with mistrust of statutory services. 	<ul style="list-style-type: none"> Engagement with tenants and tenant panels to understand lived experience. Engagement with tenant voice and panels to understand the gaps in services. Use analysis and data to explore and evidence barriers experienced by different ethnic groups. <ul style="list-style-type: none"> Work with Customer complaints to address areas of concern.
	Asian	Positive and negative	See above	See above
	African	Positive and negative	See above	See above
	Caribbean or Black	Positive and negative	See above	See above
		Choose an item.		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Positive	<ul style="list-style-type: none"> Policy acknowledges abuse linked to cultural or religious practices (e.g., HBV, FGM, forced marriage). Discriminatory abuse includes faith-based harassment. 	
SEX (GENDER)	Men	Positive	<ul style="list-style-type: none"> Recognition of risks faced by men (e.g., male victims of domestic abuse). 	
	Women	Positive	<ul style="list-style-type: none"> Strong focus on domestic abuse, coercive control, and sexual violence—issues disproportionately affecting women. 	
	Trans Men	Positive	<ul style="list-style-type: none"> The policy's inclusive language and recognition of discriminatory abuse supports trans individuals. 	
	Trans Women	Positive	<ul style="list-style-type: none"> The policy's inclusive language and recognition of discriminatory abuse supports trans individuals. 	

SEXUAL ORIENTATION	Heterosexual	Positive	The policy highlights the risks of domestic abuse in all intimate relationships	
	Lesbian	Positive	See above	
	Gay	Positive	See above	
	Bisexual/Pansexual	Positive	See above	
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Choose an item.		
Rurality i.e. access to services; transport; education; employment; broadband		Choose an item.		
Other (e.g. caring responsibilities)		Choose an item.		

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

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



4. Outcomes, Action and Public Reporting Page 42

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

Action	Target completion date	Lead Officer
<ul style="list-style-type: none"> Ensure older adults who may face barriers in accessing digital reporting have other options – such as tenancy management and Housing Support officer engagement. Raise awareness in hubs and sheltered schemes by providing sessions that explore and advise around specific domestic abuse issues for older people. 	March 2026	Amanda Wray
Offer safeguarding reporting through: <ul style="list-style-type: none"> Phone (including text relay services) Email Online forms (with screen reader compatibility) In-person at council offices or community hubs Ensure these are clearly advertised and easy to access. 	March 2026	Amanda Wray
<ul style="list-style-type: none"> Engagement with tenants and tenant panels to understand lived experience. Engagement with tenant voice and panels to understand the gaps in services. Use analysis and data to explore and evidence barriers experienced by different ethnic groups. Work with customer complaints to address areas of concern. 	March 2026	Amanda Wray
<ul style="list-style-type: none"> Ensure appropriate training is in place for staff and elected members so that they understand the increased risk to some groups 	March 2026	Tracy Brown

b. Public reporting

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

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

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

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

Name	Date	Version	Change

DRAFT

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Cheltenham Borough Council

Domestic Abuse Policy 2025-2028

Version control

Document name: Domestic Abuse

Version: 1.0

Responsible officer

- Tracy Brown
- Amanda Wray

Approved by text

Next review date: September 2028

Retention period: 6 years

Revision history

Revision date	Version	Description
date		

Consultees

Internal

- Human Resources
- Housing Services Neighbourhood and Communities Team
- Housing Services Property and Communities Team
- Informal Cabinet/Leadership Team

External

- Domestic Abuse (Housing) Programme Manager
- GSCP and GSAB District Safeguarding Network
- GDASS (training)
- GSAB (training)

Distribution

Text

Domestic Abuse and Stalking Support Services in Gloucestershire

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Appendix

Introduction

Cheltenham Borough Council is committed to fostering safe, inclusive, and supportive communities for all residents. Recognising the impact domestic abuse can have on individuals and families, the Council has developed this policy to ensure a robust, compassionate, and confidential response to those affected.

Domestic abuse can take many forms including physical, emotional, psychological, sexual, financial, and coercive control and may be experienced by anyone, regardless of age, gender, sexuality, or background. The Council acknowledges that its employees and elected members play a critical role in identifying and supporting victims and in preventing further harm.

At the heart of this policy is a person-centred approach. We strive to treat every individual with dignity and respect, tailoring support to meet their unique needs and circumstances.

We stand firmly against all forms of abuse and recognise that the responsibility for domestic abuse lies with the perpetrators. We are dedicated to creating a Borough where everyone feels safe, supported, and empowered to seek help.

Aims and scope of the policy

The aim of the Domestic Abuse (DA) Policy is to ensure the safety of tenants, residents, staff and elected members who may be affected by domestic abuse.

The policy will ensure that:

- Our employees are confident to recognise and appropriately respond to domestic abuse by providing appropriate domestic abuse training for all employees and elected members
- We work together across council services and partner agencies to provide a co-ordinated community response to domestic abuse as it requires a multi-agency response to best support those affected
- We strive towards providing a trauma-informed response
- Empowering victims by building trust and working in collaboration to meet their needs
- We take a zero-tolerance approach to domestic abuse and will hold perpetrators of abuse to account while ensuring victim's safety
- We are honest and transparent with the guidance, help and options available to those affected by domestic abuse
- We will be aware of how a person's experience of domestic abuse may be impacted by their protected characteristics by reflecting the Council's Equality and Diversity Policy in the delivery of this DA policy

This policy is underpinned by key legislation that defines the responsibilities of district councils in responding to domestic abuse. The **Domestic Abuse Act 2021** establishes a statutory duty for local authorities to provide support for victims in safe accommodation. While county councils (tier one) lead on strategy and commissioning, district councils (tier two) are legally required to cooperate in assessing local need and delivering safe accommodation services. This includes working collaboratively through Domestic Abuse Local Partnership Boards and supporting the implementation of local strategies.

Under the **Housing Act 1996**, individuals who are homeless as a result of domestic abuse are automatically considered to be in priority need. District councils must ensure suitable interim accommodation is provided and follow statutory guidance on allocations, including recent regulations that prohibit local connection requirements for survivors. Additionally, the **Care Act 2014** places safeguarding duties on councils to protect adults with care and support needs who are at risk of abuse, requiring multi-agency cooperation and timely safeguarding enquiries. These obligations are reinforced by the **Domestic Abuse Statutory Guidance (2022)**, which sets out best practice for housing, safeguarding, and partnership working.

Defining Domestic Abuse

The Domestic Abuse Act 2021 defines abusive behaviour as any of the following:

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening, degrading, or violent behaviour—including sexual violence—between people aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality.

- Controlling Behaviour can be a range of acts designed to isolate a person and make them subordinate or dependent on the perpetrator.
- Coercive Control is a pattern of acts of assaults, threats, humiliation, and intimidation used to harm, punish, or frighten the victim.
- Physical Abuse is any act that results in a physical injury that was intended to be intentional or because of punishment.
- Emotional or Psychological Abuse is mistreatment of a person where the perpetrator intends to cause mental or emotional pain or injury.
- Sexual Abuse is any act of a sexual nature which is performed in a criminal manner.
- Financial/ Economic Abuse is any behaviour that has a substantial effect on using or maintaining another person's money or property.

.Domestic abuse is not limited to physical violence and can persist long after a relationship has ended. It is rooted in power and control and can have devastating effects on victims, children, and communities.

Children and Domestic Abuse

The Domestic Abuse Act of 2021 recognises children that have witnessed domestic abuse as victims of domestic abuse in their own right – they can suffer from both physical and emotional harm and are entitled to comprehensive consistent multi-agency approach to keeping them safe from harm.

Although domestic abuse is legally defined as between people 16 and over, it is recognised that abuse can take place in teenage intimate relationships. This should be reported through the safeguarding policy however with due regard to the risk associated with domestic abuse.

[Information on reporting a domestic abuse safeguarding concern can be found here \(link to be added once policy is uploaded to intranet\).](#)

Partnership Working

The Council recognises that tackling domestic abuse requires collective action. No single agency can address every need, which is why collaboration is key to delivering effective support for victims and perpetrators.

The Council delivers its partnership commitments through Safer Gloucestershire, the Cheltenham Community Safety Partnership, the Violence against Women and Girls group and associated subgroups.

Domestic Homicide Related Death Reviews

Domestic Abuse Related Death Reviews (DARDRs) were introduced under Section 9 of the **Domestic Violence, Crime and Victims Act 2004**. DARDRs (formerly known as Domestic Homicide Reviews) are statutory processes carried out when a person dies as a result of domestic abuse, whether through homicide or by suicide.

In Cheltenham reviews are led by Cheltenham Community Safety Partnership, which is facilitated by the Council.

Council officers taking part in a DARDRs have responsibilities to share relevant information, contribute to multi-agency learning, and implement any recommendations that arise from the review to improve safeguarding and service responses. The overarching aim is to identify lessons from each case, ensure accountability, and prevent future deaths through better coordination and policy changes.

Gloucestershire Domestic Abuse Strategy 2025-2028

The Gloucestershire Domestic Abuse Strategy 2025–2028 sets out a countywide vision to ensure that everyone can live free from abuse and harm. It builds on previous plans and aligns with statutory duties under the **Domestic Abuse Act 2021** and the **Victims and Prisoners Act 2024**. The strategy emphasises prevention, early intervention, and coordinated multi-agency responses and recognises domestic abuse as a gendered crime that disproportionately affects women and girls, while acknowledging its impact on all genders.

The approach includes raising awareness, improving access to safe accommodation and support services, and strengthening safeguarding for victims and their children. The strategy has four Strategic Priorities:

Prevention and Early Intervention – raising awareness, education, and community engagement to stop abuse before it starts.

Protection and Support for Victims – ensuring timely access to safe accommodation, advocacy, and trauma-informed services.

Tackling Perpetrators – focusing on accountability and behaviour change programs to reduce reoffending.

Partnership and System Leadership – strengthening multi-agency collaboration, data sharing, and governance to deliver a whole-system response.

The DA Council's policy aligns with the County strategy and a local delivery plan is being developed.

Roles and Responsibilities

All employees and elected members must ensure they are aware of the Council's domestic abuse and related safeguarding procedures particularly those employees and members who have a specific responsibility for safeguarding and domestic abuse. All employees and elected members will receive safeguarding and domestic abuse training and information at induction and as an on-going training requirement.

Designated Senior Leaders

Cheltenham Borough Council has two Senior Leaders (one officer and one cabinet member) responsible for safeguarding and domestic abuse. They have overall responsibility for ensuring that the Council fulfils its safeguarding and domestic abuse responsibilities:

Senior Officer Lead – Claire Hughes, Director of Governance, Housing and Communities

Cabinet Member Lead – Councillor Victoria Atherstone, Cabinet member for Safety and Communities

Designated Safeguarding and Domestic Abuse Officer

The role of the Designated Safeguarding and Domestic Abuse Officer is to support employees and elected members and provide guidance and advice to aid implementation of this policy and the related safeguarding policy including to make a referral or safety plan. They will also support the Safeguarding and Domestic Abuse Advocates and Leadership team to fulfil their roles. The Council has three officers with these responsibilities:

Designated Safeguarding and Domestic Abuse Officer (non-housing) – Tracy Brown, Safeguarding and Partnerships Manager

Designated Safeguarding and Domestic Abuse Officer (housing) – Amanda Wray
Safeguarding, Diversity and Equality Manager

Designated Safeguarding and Domestic Abuse Officer (HR) – Shona Corbett, HR
Manager

Safeguarding and Domestic Abuse Advocates

Elected member Safeguarding and Domestic Abuse Advocates are responsible for championing the importance of safeguarding, tackling domestic abuse and promoting the welfare of children, young people, vulnerable adults and victims of domestic abuse. They are nominated by full council and are normally cross-party.

Safeguarding and Domestic Abuse Advocates – Cllrs Jackie Chelin, Tabi Joy, Helen Pemberton and Victoria Atherstone.

Leadership Team

Cheltenham Borough Council's Leadership Team will ensure that:

1. The Council meets its legal obligations.
2. Where applicable, domestic abuse and its prevention are considered in strategies, plans and services.
3. National best practices in domestic abuse are embedded and maintained across all services to ensure continuous improvement and compliance with national and local policies.
4. Matters relating to domestic abuse are expedited in a timely manner and treated seriously.
5. Support employees and elected members on all aspects of domestic abuse and ensure procedures are adhered to.
6. Appropriate training is facilitated on an on-going basis, in particular for frontline employees.

Service Managers

Cheltenham Borough Council's service managers will ensure that:

1. The domestic abuse policy is adhered to across the organisation.
2. They and their employees complete and implement the appropriate domestic abuse training and that this is reinforced through team meetings and 121s etc.
3. Employees handling domestic abuse issues are fully supported.
4. They take responsibility for the quality of the response to domestic abuse in their service area.
5. Report any concerns as per the policy.

Human Resources

Human Resources will ensure that:

1. The relevant policies are in place.
2. Managers are supported in the use of these policies directly and indirectly associated with domestic abuse.
3. Provide employees involved in domestic abuse support as outlined in the policy including workplace safety planning.
4. Provide support with pre-employment checks as appropriate.
5. All employees are issued with domestic abuse information and training at induction and support on-going domestic abuse training for all employees.

6. When the domestic abuse policy is updated, ensure this is communicated to all employees.

Employees and Elected Members

Cheltenham Borough Council's employees and elected members will:

1. Treat all domestic abuse matters seriously.
2. Report any concerns as per the policy.
3. Be aware of and adhere to the domestic abuse policy and related policies.
4. Complete domestic abuse training relevant to their role..

Procedures and practices

Council's approach to victims of domestic abuse

Every disclosure of abuse should be treated on a case-by-case basis and our approach to a disclosure must be victim-led. If a member of staff or elected member receives a disclosure of abuse they should follow the below principles:

Disclosure

It is understandably difficult for a victim to disclose domestic abuse. When you receive a disclosure of domestic abuse from a victim, always try to:

- Be sensitive and non-judgmental
- Find a private space and allow time
- Discuss safety
- Signpost to specialist support services

However, it is important that you:

- Do not seek proof of the abuse
- Do not contact the abuser
- Do not adopt the role of support worker yourself
- Do not compel the person to accept specialist support

Safety

It is vital to consider the safety of the person who has disclosed domestic abuse information. Staff and elected members should take any actions necessary to ensure the person's immediate safety if at immediate risk. GDASS (Gloucestershire Domestic Abuse Support Service) is the local support service for domestic abuse and can offer guidance on safety planning in the longer term.

Staff and elected members should always consider their own safety as well as that of other people associated with the Council or the public. Any concerns about safety can be raised with the designated safeguarding officer or the HR safeguarding lead.

Risk

Domestic abuse results in the death of around two women per week and 30 men per year. It is therefore vital in case of domestic abuse to establish the risk posed so that necessary action can be taken.

Staff and elected members should complete a [DASH form](#) to help them clarify the risk. This should wherever possible be completed with the person making the disclosure. This can help support safety planning and determine what the next steps are. As depending on the risk, it may be necessary to involve other agencies.

Support with the DASH form can be given by the designated safeguarding officers or via the GDASS helpline.

Consent and Confidentiality

All disclosures of domestic abuse will be handled with the utmost discretion, and information will only be shared with relevant professionals when necessary to protect individuals from harm or to comply with safeguarding obligations.

Any disclosure must be treated with strict confidentiality and only shared with consent of the individual. The only exceptions to this are:

- In the case of high-risk domestic abuse
- If there is a risk to children
- If there is a risk to a vulnerable adult
- If a crime has been committed

If employees or elected members are uncertain about whether a disclosure can be shared without consent, they should discuss their concerns with either the Council's designated officers or seek specialist advice from One Legal.

Safeguarding referral

If the disclosure involves a child, young person or vulnerable adult where there is also a safeguarding concern, it is important for employees and elected members to follow the appropriate procedures in the safeguarding policy to report a safeguarding concern.

[Link to procedure from Safeguarding policy to be added when uploaded to the intranet](#)

Support for Cheltenham Borough Council tenants

The Council will treat all reports of domestic abuse from tenants within the Council's housing stock as a high priority. Trained employees will follow the correct protocols and refer to the appropriate agencies who can provide specialist advice and support.

The Council's Housing Services

The Council's Housing Services team will aim to ensure:

1. Tenants are able to report domestic abuse in various ways that best suit their needs. This could be via telephone, email or in person and where possible ensure a member of staff on request of the same gender. This could be via the Council's domestic abuse inbox, safeguarding inbox or customer services inbox. If tenants contact customer services, the concerns will be dealt with confidentiality and passed onto the relevant domestic abuse lead.
2. Safety is prioritised when communicating with tenants. This could include the type of communication channel used, the safety of a physical location, safe dates/times of communication, agreed 'safe words' to use in communications, and any other reasonable adjustment tailored to specific need and circumstances.
3. Confidential advice is provided or signposted to specialist services such as Gloucestershire Domestic Abuse Support Service (GDASS), ensuring timely and appropriate referrals. In discussion with the tenant, Housing Services employees may also complete referrals where appropriate for on-going support, this could include referrals for mental health or substance misuse to ensure wraparound support is offered.

Once a tenant has disclosed domestic abuse the Council will, agree the frequency and safety of communications with the tenant to remain in regular contact. Alternative contact arrangements will be provided in case of absences, for reassurance of continued support.

Relevant advice and help, including information about victims' rights and options to remain in their home where it is safe, and their wish to do so. This could include discussions and signposting regarding protection orders (such as Non-Molestation Orders or occupation orders), including additional security measures in the home if appropriate and suitable, as well as on-going support from specialist organisations.

Housing options will be offered in high-risk cases where victims are in immediate fear of their households' safety. This could include a homeless application, temporary accommodation, refuge, or a managed move if there is no prospect of a safe return. The Council supports the county wide Places of Safety scheme. The scheme enables tenants experiencing domestic violence to move to a different area in the county with expert support in place.

If a tenant is in temporary accommodation the Council will provide information and reassurance on any safety measures, of that accommodation.

The Council will action a multi-agency risk assessment (MARAC) and provide intelligence to inform the overall assessment of risk and work with partners to develop action plans to manage those risks, to ensure tenant and wider community safety. On-going management of MARAC related cases is carried out by the Council's Tenancy Services Team.

Homelessness

The Cheltenham Borough Council Housing and Homelessness Strategy (2023–2028) addresses domestic abuse as a key factor contributing to homelessness and housing vulnerability. It recognises that victims of domestic abuse often face urgent housing needs and prioritises early intervention to prevent homelessness in these cases. The strategy commits to working closely with partners, including safeguarding teams and specialist domestic abuse services, to ensure that survivors have access to safe and secure accommodation and tailored support. This includes emergency housing options and pathways into longer-term solutions that promote stability and recovery.

The strategy aligns with the **Homelessness Reduction Act** duties, ensuring that anyone threatened with homelessness due to domestic abuse receives structured advice and assistance. The Council aims to make rough sleeping rare and non-recurring, with specific measures for vulnerable groups such as those fleeing abuse. By embedding domestic abuse considerations into its housing policies, Cheltenham seeks to create safer communities and reduce the risk of repeat homelessness among survivors.

Council staff who are victims or perpetrators of domestic abuse

Where any matter covered by this policy relates to an employee of the Council, the issue will be managed in accordance with the Council's internal HR policies, procedures, and LGA guidance.

[link to intranet Domestic Abuse Guidance For Employees and Managers \(to be added once uploaded\)](#)

The Council's approach to perpetrators

The Council will support police action where appropriate and share information regarding perpetrators to prevent domestic abuse reoccurring and to prevent wider community harm.

Tenants who are perpetrators of domestic abuse

When taking any action against a perpetrator, the Council will prioritise the safety and wishes of victims and ensure housing needs are fully considered. The Council will hold perpetrators to account for their behaviour, this may include the right to take enforcement action against tenants, using the powers available under the Housing Act, up to and including recovering possession of a property, and may remove perpetrators from both joint and sole tenancies. Link to policy to be added once uploaded.

Where it is safe and appropriate to do so without increasing risk to the victim. The Council will consider referring perpetrators to specialist support for positive engagement as long-term domestic abuse prevention requires behavioural change from those who cause harm. This can be discussed and actioned for perpetrators who recognise their behaviour and would like support.

Stalking and harassment

Stalking or harassment happen when someone repeatedly behaves in a way that makes a person feel scared, threatened or distressed. Stalking is a form of harassment where the stalker carries out behaviours which are fixated, obsessive, unwanted and repeated. The types of behaviours which may make up stalking can include:

- Following someone
- Contacting someone or trying to contact someone in any way
- Publishing material about someone or pretending to be someone online or elsewhere
- Monitoring someone's internet use, emails or other electronic communications
- Loitering near places someone goes (whether public or private spaces)
- Interfering with someone's property
- Watching or spying on someone

Stalking or harassment can happen online such as through social media, email, chat rooms and other online platforms. This is called "cyberstalking".

If an employee or elected member receives a disclosure of stalking and/or harassment they should seek advice from specialist local services or contact the appropriate designated domestic abuse officer for support.

Domestic Abuse Training

All Council employees and elected members will receive domestic abuse awareness training at point of induction and on-going. This training will be updated every 3 years to ensure best practise is followed.

Where relevant to their role employees and elected members will also receive specialist domestic abuse training. This will include DARE (domestic abuse routine enquiry) to support officers to work with perpetrators of domestic abuse, domestic abuse and risk training, and enhanced domestic abuse training level 2 via GDASS.

Training needs of Council employees and elected members will be reviewed regularly by service managers to ensure staff are able to confidently support disclosure, identify risk and keep themselves and the community safe.

Support for front-line employees

Domestic abuse is a complex, sensitive and high-risk matter, dealing with disclosures or allegations. Front-line employees can access support themselves when supporting victims or perpetrators as well as those experiencing domestic abuse as either a victim, perpetrator or their wider family. Employees can access support via the employee assistance program.

Information and Advice

The Council will ensure clear, accessible information and advice is provided in a range of formats for those impacted by domestic abuse such in leaflets, posters, internal newsletter website, social media, awareness talks and the tenancy handbook.

Monitoring and Review of the Domestic Abuse Policy

The Domestic Abuse Policy will be monitored and reviewed to ensure it remains effective.

Monitoring and review will include:

- Direct learning from tenant lived experiences
- Support and supervision of employees and elected members
- Ensuring that lessons learnt included those from DARDR's are reflected in future policy and best practice reviews
- Changes in national legislation

Organization	Phone	Email	Website	Details
Gloucestershire Domestic Abuse Support Service (GDASS)	01452 726570	support@gdass.org.uk	www.gdass.org.uk	Local service offering advice, safety planning, refuge access, and advocacy.
National Domestic Abuse Helpline (Run by Refuge)	0808 2000 247	helpline@refuge.org.uk	www.nationaldahelpline.org.uk	24-hour free helpline for anyone experiencing domestic abuse.
GALOP (For LGBT+ People)	0800 999 5428	help@galop.org.uk	www.galop.org.uk	Specialist support for LGBTQ+ victims of domestic abuse.
Rape Crisis (England and Wales)	0808 802 9999	info@rapecrisis.org.uk	www.rapecrisis.org.uk	Support for anyone affected by sexual violence.
Mankind Initiative (For Male Victims)	01823 334244	info@mankind.org.uk	www.mankind.org.uk	Confidential helpline for male victims of domestic abuse.
Respect (Perpetrator Support & Advice)	0808 802 4040	info@respectphonenumber.org.uk	www.respectphonenumber.org.uk	Advice for perpetrators seeking help to change behaviour.
Love Respect		support@loverespect.co.uk	www.loverespect.co.uk	Aimed at 16–25-year-olds, providing education on healthy relationships.
Women’s Aid	0808 2000 247	info@womensaid.org.uk	www.womensaid.org.uk	National charity supporting women and children affected by domestic abuse.
GreenSquareAccord	0300 111 7000	info@greensquareaccord.co.uk	www.greensquareaccord.co.uk	Expanding provision of safe places and housing support for victims.
FearFree – Stalking and Harassment Service	08088 020300	isac@fearfree.org.uk	www.fearfree.org.uk	Provides an Independent Stalking Advocacy Caseworker (ISAC) for Gloucestershire. Offers risk assessment, safety planning, and liaison with police and courts.

STREET (Young People's Domestic Abuse Service)	0808 168 9111	STREETreferrals@victimsupport.org.uk	www.victimsupport.org.uk	For young people aged 13–19 experiencing teenage relationship abuse or affected by domestic abuse in the home.
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Draft timeline to create the Tackling Domestic Abuse Local Implementation Plan

Aim	Initial Action/s	Timescales	Lead
To create a place-based implementation plan that responds to the needs of Cheltenham's communities.	<ol style="list-style-type: none"> 1) The VAWG subgroup of the Community Safety Partnership (CSP) to consider the County's DA strategy and make recommendations to the CSP. 2) Review membership of VAGW subgroup to coordinate the implementation plan ensuring representation of seldom heard communities 3) The Community Safety Partnership to consider the recommendations of VAWG and agree an action plan for implementation. 4) VAWG to coordinate the delivery of the agreed implementation plan and report on progress regularly to the CSP. 	<p>January – March 2026</p> <p>March 2026</p> <p>April 2026</p> <p>From May 2026</p>	<p>Chair of VAWG (Tracy Brown)</p> <p>Chair of VAWG (Tracy Brown)</p> <p>Chair of TCSP (Claire Hughes)</p> <p>Chair of VAWG (Tracy Brown)</p>
To understand how societal inequality impact on domestic abuse to inform the local implementation plan	<ol style="list-style-type: none"> 1) Facing Hardship Board to consider the County's DA strategy and feed into the Community Safety Partnership implementation plan so the impacts of societal inequality are considered 	<p>April 2026</p>	<p>Chair of Facing Hardship (Claire Knapman)</p>
To understand how domestic abuse impacts on children and young people in Cheltenham to	<ol style="list-style-type: none"> 1) NCLB Strategic Board to consider the County's DA strategy from a children and 	<p>March 2026</p>	<p>Chair of NCLB Strategic Board (Cllr Victoria Atherstone)</p>

Draft timeline to create the Tackling Domestic Abuse Local Implementation Plan

ensure the implementation plan reflects this	young person's point of view especially regarding gaps in services for children and young people, online abuse and exploitation and feed recommendations into the local implementation plan		
To raise awareness of child to parent abuse and how this will be supported within the implementation plan	1) NCLB Strategic Board to review the issues as highlighted in the strategy and make recommendations to the CSP	March 2026	Chair of NCLB Strategic Board (Cllr Victoria Atherstone)
To understand culturally motivated harm such as honour-based violence, FGM and forced marriage and how the implementation can support	1) The VAWG subgroup to liaise with local faith-based groups and Gloucestershire Constabulary for insight and advice and to consider alongside the County's DA strategy 2) Feedback recommendations to the CSP	March to April 2026	Chair of VAWG (Tracy Brown)
To raise awareness and understanding of the issues of misogyny, sexism and radicalisation	1) NCLB youth voice subgroup to prepare a report/presentation based on findings from girls survey around the subject of misogyny and sexism for the Communities Partnership 2) Serious & Organised Crime and Exploitation subgroup to add sexism, misogyny and radicalisation to its agenda to make recommendations on the topic for the local implementation plan	March 2026	Chair of NCLB Youth Voice subgroup (Tracy Brown) Chair of SOCE subgroup (Caroline Walker and Gavin Morgan)

Draft timeline to create the Tackling Domestic Abuse Local Implementation Plan

<p>To understand how offline and online stalking crimes are impacting our local communities</p>	<p>1) Work with Gloucestershire Constabulary to obtain recent data and trends and how to address in the local implementation plan</p>	<p>March to April 2026</p>	<p>Chair of VAWG (Tracy Brown)</p>
<p>To ensure the needs of older adults are met within the local implementation plan</p>	<p>1) GSCP and GSCAB District subgroup to explore the concerns relating to older victims of abuse and how to respond effectively. 2) Actions from the District subgroup to be incorporated into the local plan as relevant</p>	<p>January 2026 April 2026</p>	<p>Chair of District Subgroup (Tracy Brown)</p>
<p>To encourage local employers to develop policies and procedures to support staff who may be victims of abuse and to raise awareness of the pathways to support in the county.</p>	<p>1) Work with the BID, Chamber of Commerce and Circle 2 Success to understand the current position of local businesses in Cheltenham 2) Consult with local businesses to understand any barriers or support needed and incorporate key actions into the implementation plan</p>	<p>From May 2026</p>	<p>Chair of VAWG (Tracy Brown)</p>
<p>To ensure all registered housing providers are supporting the delivery of the local implementation plan</p>	<p>1) Work with CBC Housing and Support Forum to ensure all registered housing providers are supporting the delivery of the local implementation plan.</p>	<p>From April 2026</p>	<p>Housing Strategy & Enabling Officer (Nigel Potter) Chair of CBC Housing and Support Forum (John Rawson)</p>
<p>To raise awareness of domestic abuse and issues within the local implementation plan across the community</p>	<p>1) Create a communications plan that can be shared across the partnership and CBC's own comms channels including key national campaigns</p>	<p>April 2026 May 2026</p>	<p>Community Safety Partnership Co-ordinator (Kelly Patterson)</p>

Draft timeline to create the Tackling Domestic Abuse Local Implementation Plan

	2) Hold a multi-agency conference inviting key community leads to launch the local implementation plan and create commitment across partners for its delivery		Community Safety Partnership Co-ordinator (Kelly Patterson)
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Cheltenham Borough Council

Cabinet – 24 February 2026

Cheltenham Tree Strategy

Accountable member:

Cabinet Member for Planning and Building Control, Councillor Mike Collins

Accountable officer:

Tracey Birkinshaw, Director Planning and Building Control

Ward(s) affected:

All

Key Decision: No

Executive summary:

This report presents to Cabinet Cheltenham Borough Council's first Tree Strategy with a recommendation for approval. It sets out a clear framework for managing, protecting, and enhancing the town's tree stock. Developed in response to climate change, resource challenges, and community expectations, the strategy has used ward-level data to understand the provision of existing tree cover and guide future planting.

It includes:

- Tree Management Policies – These guide how we care for and maintain trees under Council ownership.
- Trees in Planning Action Plan – This outlines how we will engage with the planning process and improve stakeholder engagement to protect existing trees and promote new planting through development.

The strategy supports biodiversity, climate resilience, and public wellbeing, and aligns with the Council's Corporate Priority - reducing carbon, achieving council net zero, creating biodiversity. Cabinet is asked to approve the Tree Strategy for publication and delegate authority for final minor amendments to ensure it is professionally formatted and visually ready for public release. Further delegation is also requested to ensure this Strategy remains a 'living document' and can be updated in a timely manner, as required in consultation with the Cabinet Member for Planning and Building Control.

Recommendations: That Cabinet:

- 1. approves the Cheltenham Tree Strategy and delegate to the Director of Planning and Building Control in consultation with Cabinet Member for Planning and Building Control any minor amendments prior to publication.**
 - 2. delegate to the Director of Planning and Building Control in consultation with Cabinet Member for Planning and Building Control any amendments arising from future reviews of the Tree Strategy to ensure it remains relevant and up to date as a management tool.**
-

1. Implications

1.1 Financial, Property and Asset implications

There are no financial implications arising from the Tree Strategy approval. Funding for tree management and planting is funded by existing budgets. Should there be a future requirement for additional funding, then this would need to be considered by a separate growth bid at the appropriate time

Signed off by: Ela Jankowska, Finance Business Partner

ela.jankowska@cheltenham.gov.uk

1.2 Legal implications

The Climate Change Act 2008 requires local authorities to promote measures which can help mitigate the effects of climate change which includes the maintenance of existing trees and new tree planting. The policies within the Tree Strategy support the council's legal requirements in terms of the management of its own tree stock. This includes the council's legal responsibilities in relation to health and safety requirements; occupier's liability, planning related legislation and wildlife and protected species legislation.

Tree owners of trees have a duty of care to visitors, residents and passers-by. The Authority in addition has a statutory duty of care under the Health and Safety at Work

etc. Act 1974 and the Occupiers Liability Acts 1954 and 1984 to ensure so far as is reasonably practicable trees for which it is directly responsible are safe and do not pose a danger to the public.

In addition to ensuring that its trees are safe, the Authority has several other statutory responsibilities in relation to trees. Under the Town and Country Planning Act 1990 the Authority, as the Local Planning Authority has a duty to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees. Under Part VIII of the Town and Country Planning Act 1990 the Authority also has the power to make Tree Preservation Orders to protect landowners from cutting down, uprooting, topping, lopping, or causing wilful damage or destruction of a tree protected by such an order. Breach of such an order can amount to a criminal offence.

The Tree Strategy is produced by the Authority to provide a guide to the public/landowners as to how the Authority discharges its various responsibilities given to it in relation to the management of trees.

The approval of the Tree Strategy is a Cabinet function.

Signed off by: Charlotte Lockwood, Senior Locum Lawyer One Legal legalservices@onelegal.org.uk . 01684 272102

1.3 Environmental and climate change implications

A Climate Change Impact Assessment has been completed. This is provided at Appendix 3 of this report.

The Climate Change Team have been closely involved in the drafting of this strategy, in particular supporting the mapping of the data across the Borough. This strategy aligns with our environmental goals, supports biodiversity, and contributes to tackling climate change by reducing carbon emissions and helping with climate change adaptation, urban cooling and broader environmental aims.

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

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Reducing carbon, achieving council net zero, creating biodiversity

1.5 Equality, Diversity and Inclusion Implications

See Appendix 4.

1.6 Performance management – monitoring and review

A monitoring and review section is included as part of the Tree Strategy.

2 Background

2.1 Trees play a vital role in improving our quality of life, from enhancing air quality to providing valuable habitats for wildlife. They offer shade in the summer; help reduce the impact of flooding and bring beauty to our urban landscape. Trees make Cheltenham a happier and healthier place to live in and to visit. They are central to the town's character and heritage and intrinsic to its appeal and unique charm.

2.2 Cheltenham Borough Council actively manages its tree stock through the dedicated work of the Council's Tree Team. However, until now, there has been no published document that clearly outlines our priorities or our approach to tree management. The need for such a strategy has become increasingly relevant considering the ever-growing challenges, including:

- Climate change which brings more extreme weather and increased pressure on urban ecosystems.
- Resource constraints, including funding and officer capacity.
- Community pressures, such as rising public expectations for tree planting and protection, concerns over tree-related risks, and the need to balance development with environmental stewardship.

This strategy responds to these challenges by providing a clear framework for how the Council will manage, protect, and enhance Cheltenham's tree stock in a sustainable and equitable way.

3 Understanding our Data

3.1 The starting point for this strategy was a detailed analysis of Cheltenham's existing tree stock, using data held by the Council on a ward-by-ward basis together with data held by organisations, such as the Woodland Trust. This analysis looked at a range of factors such as

Extent of canopy cover – measuring the proportion of land covered by tree canopy in each ward.

Age – identifying the age distribution of trees to understand long-term sustainability and future replacement needs.

Health – evaluating the condition of trees to inform maintenance priorities and

risk management.

3.2 This data-driven approach has enabled the Council to look strategically at the stock of trees and extent of canopy cover. Our assessment highlighted two important reflections:

1. Cheltenham, despite its excellent parks and well-treed streets, sits below the national average for canopy cover, while this may be understandable for a predominantly urban area, it highlights the need for strategic improvement.
2. There is a clear disparity between better provisioned wards and those with fewer trees. This is likely due to historic spatial planning decisions, which have favoured tree planting in areas with higher equity scores, and under-provisioned those with lower scores.

3.3 The analysis is further supported by the Woodland Trust's [Tree Equity Score](#), which considers canopy cover in the context of various other factors. Its metric is a tree canopy cover goal which takes account of population density, existing canopy, local income, employment, health, age, heat severity, air pollution. Cheltenham's overall score is 87, but at local level we see disparity - neighbourhoods range from 60 in St Peter's in the northwest of Cheltenham (with a canopy cover of just 9%) and 100 in Moorend in the southeast of Cheltenham (with a canopy cover of 30%).

3.4 Further analysis shows that open spaces are unevenly distributed across wards and that new planting has not followed a systematic approach. This conclusion is based on data gathered during routine tree safety inspections and subsequent analysis of tree condition, age, size potential, age potential, and pollination strategy.

4 Vision and Principles

4.1 Through our engagement with communities and stakeholders alongside the deep dive into the data available a vision and set of principles were developed, the vision being:

For the benefit of our town's environment now and into the future we will work to achieve a well-managed and sustainable urban forest in Cheltenham, to benefit the town's arboricultural amenity value, ecological balance, economic prospects, and social well-being.

4.2 To deliver the vision a suite of tree management principles has been developed.

- Enhance Cheltenham's tree population through careful species selection, planning, and community engagement — always aiming to maximise canopy cover while respecting local conditions and the Borough's rich

- heritage.
- Manage our own tree stock in a consistent, organised, and proactive way, using evidence-based approaches.
 - Promote the right tree in the right place, planting appropriate species and numbers to reflect the site's conditions and future growth potential.
 - Ensure replacement planting is meaningful, with a focus on long-term canopy contribution rather than just numbers.
 - Protect trees through the planning system, guided by analysis of local tree population.

5 Policies and Action

5.1 The Tree Strategy is divided into two key components:

Tree Management Policies: These outline the principles and standards we will follow in the management of trees owned or maintained by the Council. They guide our day-to-day operations, risk management, and long-term stewardship of the Borough's tree stock.

Trees in Planning Action Plan: This sets out how we will proactively engage with the planning process to protect existing trees, promote new planting, and ensure that trees are fully considered in the design and delivery of development across the Borough.

5.2 Together, these components provide a comprehensive framework for safeguarding and enhancing the contribution the Council can make to planting, managing and safeguarding trees across the Borough.

6 Reasons for recommendations

6.1 Cabinet is asked to approve Cheltenham Borough Council's first Tree Strategy for publication. The strategy provides a clear framework for managing, protecting, and enhancing the town's tree stock in response to climate change, resource challenges, and community expectations.

6.2 Cabinet is further asked to delegate authority to the Director of Planning & Building Control, in consultation with the Cabinet Member for Planning and Building Control.

7 Alternative options considered

7.1 The alternative is to not deliver a Tree Strategy. It is considered that the Tree Strategy as presented provides enhanced transparency in the way in which the Council both manages and invests in its own tree stock, together with setting out the positive ways in which other stakeholders whether that is the proactive work undertaken by Gloucestershire County Council, parish councils and

neighbourhood groups or developers through the delivery of planning applications can deliver, support and maintain our tree stock.

7.2 This Strategy will be the first of its kind for Cheltenham and will form an active tool in creating a forward thinking and sustainable approach to managing, preserving, and expanding tree cover across. Its outcomes will help to:

- Increase Tree Canopy Coverage
- Enhance Biodiversity
- Mitigate Climate Change
- Improve Air Quality and Mitigate Flood Risk
- Enhance Health and Well-being
- Protect and Maintain Existing Tree Stock
- Promote Education and Awareness
- Maximise Funding

8 Consultation and feedback

8.1 There has been wide ranging consultation on the emerging strategy. Early engagement began with internal officers across the climate change, green spaces and planning teams together with Gloucestershire County Council. This early engagement included the Woodland Trust and helped to build the scope of the emerging strategy. The Woodland Trust has reviewed the draft as presented and has endorsed the strategy.

8.2 A questionnaire was published to encourage participation from across our communities. This generated over 200 individual responses and was used to test against the emerging analysis of our existing knowledge, data sets and best practice together with helping to bring the story of Cheltenham Trees to life.

8.3 A wider in person stakeholder workshop took place on 10th July 2025. A wide range of individuals and stakeholders were invited to this event ranging from elected members, parish councils, Gloucestershire County Council, neighbourhood and interest groups. Over 30 groups and individuals were represented at the workshop which created the opportunity to test emerging findings from the detailed data analysis and best practice together with testing role, purpose and outcomes of the strategy. This workshop has been invaluable to establishing the form and content of the strategy as now presented.

8.4 A round table session to review the draft Tree Strategy was undertaken with relevant Cabinet members including:

- Cabinet Member for Planning and Building Control
- Cabinet Member for Waste, Recycling, Parks, Gardens and Public Realm Greenspace

- Cabinet Member for Climate Emergency

8.5 In presenting this report to Cabinet, I would like to take the opportunity to thank the many participants who have actively engaged in the drafting of the Tree Strategy as presented today. Particular thanks to the Cheltenham Tree Group, Climate Change Team, The Woodland Trust and lead Cabinet members who have shown a keen interest in the development of the strategy and have provided ongoing advice and detailed comments.

9 Key risks

9.1 See Appendix 2.

Report author:

Tracey Birkinshaw, Director Planning & Building Control
tracey.birkinshaw@cheltenham.gov.uk

Appendices:

- i. Draft Tree Strategy
- ii. Risk Assessment
- iii. Equality Impact Assessment – Screening
- iv. Climate Change Impact Assessment

Background information:

[Climate Leadership Gloucestershire – Climate Risk and Vulnerability Assessment](#)

Appendix 2: 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
TS01	If the Tree Strategy is not approved, then this would limit the planning team's contribution to helping to deliver our Corporate Strategy (Key Priority 3).	Tree Officer	2	1	2	Reduce	Active engagement with relevant Cabinet portfolio holders	Director Communities & Economic Development	18/11/25
TS02	If the Tree Strategy is not approved, then this may have a reputational impact given the positive engagement to date across elected members, parish councils, Gloucestershire County Council, neighbourhood groups and stakeholders together with members of the public.	Tree Officer	2	1	2	Reduce	Active engagement with relevant Cabinet portfolio holders	Director Communities & Economic Development	18/11/25

Appendix 3: Equality Impact Assessment (Screening)

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Director Planning & Building Control	Service Area: Planning
Title: Tree Strategy	Date of assessment: 06/10/2025
Signature: Tracey Birkinshaw	

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

Tree Strategy

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:	<ul style="list-style-type: none"> To create a forward thinking and sustainable approach to managing, preserving, and expanding tree cover across Cheltenham To optimise the efficient management of the Borough’s own stock
Objectives:	<ul style="list-style-type: none"> Enhance Cheltenham’s tree population through careful species selection, planning, and community engagement — always aiming to maximise canopy cover while respecting local conditions and the Borough’s rich heritage. Manage our own tree stock in a consistent, organised, and proactive way, using evidence-based approaches. Promote the right tree in the right place, planting appropriate species and numbers to reflect the site’s conditions and future growth potential.

	<ul style="list-style-type: none"> • Ensure replacement planting is meaningful, with a focus on long-term canopy contribution rather than just numbers. • Protect trees through the planning system, guided by analysis of local tree population.
<p>Outcomes:</p>	<ol style="list-style-type: none"> 1. Increase Tree Canopy Coverage: One of the primary aims is to address the disparity of canopy cover across Cheltenham. This involves looking at a broad range of data including tree equity data and inspection data etc to better inform the location and planting of trees in spaces where they make a social, environmental and economic contribution. This will help to expand canopy cover and contribute to environmental health. This aim will also inform decisions in the planning process to better protect trees on private land. This should be achieved through diversity of species and characteristics of Cheltenham’s tree stock. 2. Enhance Biodiversity: Trees support a wide range of plant, animal, fungal and bacteria species. A key aim of this strategy, feeding into our Nature Recovery Strategy Supplementary Planning Document, is to increase biodiversity by planting a broad range of tree species, which provide habitats for wildlife and contribute to ecological resilience. 3. Help Mitigate Climate Change: Trees are important for absorbing carbon dioxide (CO2). Cheltenham has a commitment to carbon net zero by 2030. By maintaining and increasing the number of trees that can sequester carbon, and reduce heat island effects in our urban area, we can help mitigate climate change and help regulate our local climate. 4. Improve Air Quality and Mitigate Flood Risk: Trees act as natural filters, improving air quality by collecting pollutants and releasing oxygen. They also help manage water runoff and reduce the risk of flooding by slowing the flow of rainwater into drains, streams and rivers. 5. Enhance Health and Well-being: Trees are important to our communities. They support both our mental and physical health. Urban trees help create attractive areas, whilst trees in our green spaces enhance these spaces, create areas for recreation, reducing stress, and encouraging outdoor activities. 6. Protect and Maintain Existing Tree Stock: A key part of any tree strategy is the preservation of existing trees. This involves robust inspection and maintenance, good biosecurity measures and ensuring we plant the right tree for the right place so that full crown potential can be achieved. 7. Promote Education and Awareness: This aim will help to engage local communities with the broader understanding and a sense of ownership of their environment. 8. Maximise Funding: This trees strategy can be used as a lever for funding for future tree management.
<p>Benefits:</p>	<p>See above.</p>

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	Yes
Do you expect the impacts to be positive or negative?	Positive
Please provide an explanation for your answer:	

- Having a clear approach to how trees are managed and planned for across land owned by Cheltenham will have a positive impact on communities. By publishing a Tree Strategy, it allows the council to be transparent in the way it plans for and manages trees allowing communities and other stakeholders to positively engage within clear expectations.
- The data analysis that supports this strategy has clearly identified that the distribution of trees across the borough is inequitable. The Tree Strategy provides a positive tool with which to positively address the imbalance prioritising tree planting and canopy cover, especially in under-provisioned wards.
- More trees and better maintained and planned for tree planting programmes contributes to cleaner air, cooler urban temperatures, and better mental health outcomes.
- Targeted planting in areas with low tree equity scores helps address environmental inequalities.
- Active engagement in tree planting and stewardship fosters civic pride and gives residents a voice in shaping their environment.
- Preparation of the Tree Strategy has included collaboration across various officer teams and lead Cabinet portfolio members, helping to build buy-in to the outcomes.

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

f. Identify next steps as appropriate	
Stage Two required	No
Owner of Stage Two assessment	N/A
Completion date for Stage Two assessment	N/A



CHELTENHAM
BOROUGH COUNCIL

Cheltenham Tree Strategy

February 2026

cheltenham.gov.uk

Introduction from Mike Collins

- cabinet member for planning and building control

As the cabinet member for planning, I am proud to present our tree strategy, a first for Cheltenham. This forms a key part of our commitment to creating a greener, healthier and more sustainable environment for our community.

Trees play a vital role in improving our quality of life, from enhancing air quality to providing valuable habitats for wildlife. They offer shade in the summer, help reduce the impact of flooding and bring beauty to our urban landscape. Trees make Cheltenham a happier and healthier place to live in and to visit. They are central to the town's character and heritage and intrinsic to its appeal and unique charm.

Our strategy sets out a clear vision for the future, ensuring that we not only protect and maintain our existing trees but also plan for the planting of new ones, particularly in areas where they are most needed.

This strategy aligns with our environmental goals, supports biodiversity, and contributes to tackling climate change by reducing carbon emissions and helping with climate change adaptation, urban cooling and broader environmental aims.

Cheltenham Borough Council understands the importance of a collaborative approach and in preparing this strategy we have worked alongside local community groups, schools and wider stakeholders to bring Cheltenham's story to life. Together, we can create a lasting legacy for future generations, ensuring that trees continue to thrive in our community for years to come.

I would like to take this opportunity to thank the numerous stakeholders and groups that have inputted into this strategy, for your expert advice and enthusiasm.

I invite all readers of this strategy to join us on this journey by playing your own individual part, as we work together to nurture the green spaces that make our area a better place to live, work and play.



Elle Bullimore, The Woodland Trust regional director - South West England said:

'The Woodland Trust welcomes the Cheltenham Borough Council Tree Strategy as a shared vision and plan for trees and woods across the town. The forward-looking approach demonstrates a clear commitment to making Cheltenham a greener, healthier and more climate-resilient place. Prioritising the expansion and protection of the town's trees, the council is ensuring that people and nature thrive together. Through this plan, Cheltenham's leadership is setting a powerful example of how local authorities can work with partners and residents to create lasting benefits for future generations.'

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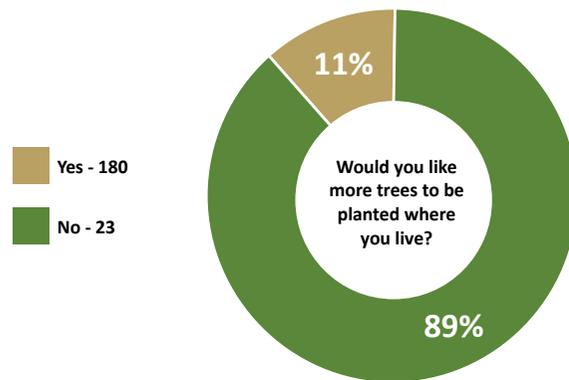
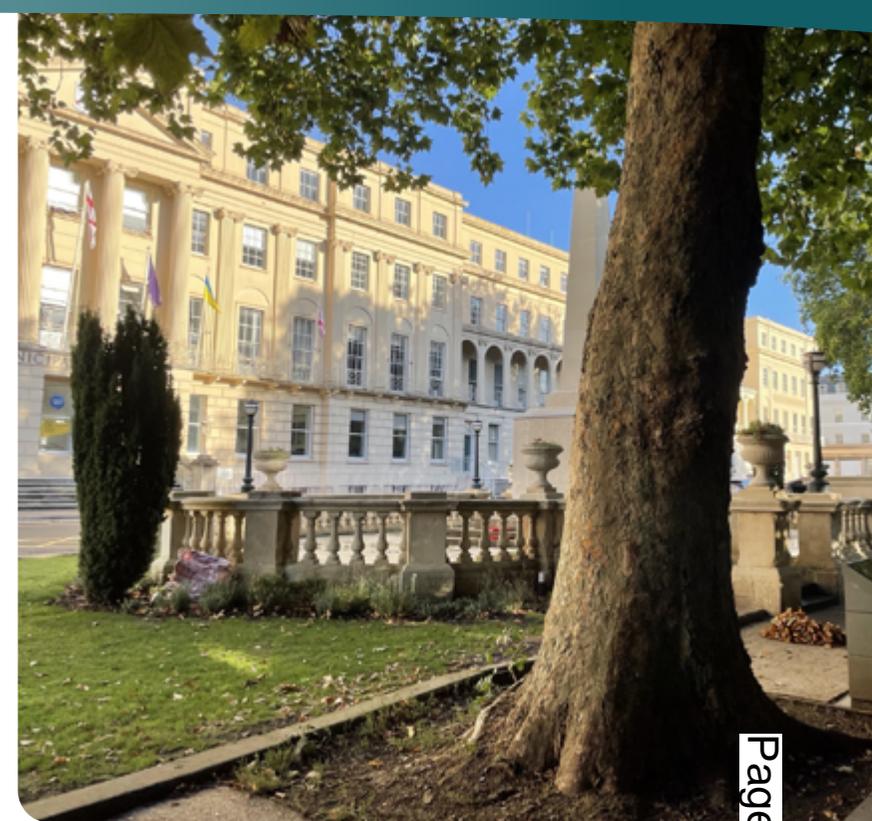
Introduction

Cheltenham has a proud tradition of trees within the urban landscape and beyond, forming an integral part of the town’s natural and cultural heritage. This centuries-old history of public trees management forms a rich legacy dating back to the town’s creation, which is represented by its current exceptional tree population.

Cheltenham was one of the first locations nationally to deliberately plant street trees as amenity features in the late 1820s. The formalised planted areas were predominantly Pittville but also the Promenade and there is evidence that captain Henry Skillicorn planted “urban” trees much earlier than this. There are still some trees within the town centre which could be from these early plantings. These heritage trees have been allowed to achieve their natural form and have not been heavily pruned or onerously managed. This reflects previous commitments to tree planting and skilled management of the stock over some 200 years.

It is within this context that this strategy is created to manage the borough’s tree stock and to plan into the future. This strategy aims to address not only trees on public land but also trees within private ownership and trees within the planning process, recognising their value in preserving Cheltenham’s historic character and enhancing its environmental legacy.

To help inform this strategy, a workshop was undertaken, inviting key stakeholders from inside and outside the council. Around 30 groups and individuals were represented at the workshop and contributed to the form and content of this document. To support this, an online questionnaire was made available, to which more than 200 residents responded, providing useful insight into the strength of public feeling about trees locally.



Part 1: Provides the background and context for the strategy.

Part 2: Summarises the analysis that has informed the strategy together with the vision, principles and aims.

Part 3: This is the strategy and sets out the council’s approach to managing and protecting trees across the Borough. It is divided into two key components:

Tree management policies: These guide how we care for and maintain trees under council ownership.

Trees in planning action plan: This outlines how we will engage with the planning process and improve stakeholder engagement to protect existing trees and promote new planting through development.

Together, these elements support our commitment to a greener, healthier and more resilient urban environment.

Part 1: Background and context

Understanding the council's own tree stock

A [paper published](#) in 2023 by Forestry Research suggests that mean canopy cover in England is 17.3%. The same paper found that Cheltenham's canopy coverage is 12.9% with variation ward by ward between 23% at the top end and 7% at the bottom. This indicates two things.

1. Cheltenham, despite its excellent parks and well-treed streets, sits below the national average for canopy cover, while this may be understandable for a predominantly urban area, it highlights the need for strategic improvement.
2. There is a clear disparity between better provisioned wards and those with fewer trees. This is likely due to historic spatial planning decisions, which have favoured tree planting in areas with higher equity scores and under-provisioned those with lower scores.

The analysis is further supported by the Woodland Trust's [tree equity score](#), which considers canopy cover in the context of various other factors. Its metric is a tree canopy cover goal which takes account of population density, existing canopy, local income, employment, health, age, heat severity and air pollution. Cheltenham's overall score is 87, but at local level we see disparity. Neighbourhoods range from 60 in St Peter's in the northwest of Cheltenham (with a canopy cover of just 9%) and 100 in Moorend in the southeast of Cheltenham (with a canopy cover of 30%).

A [2017 study by Forestry Research](#) indicated that non-woodland tree cover represents 11% of land area in urban areas. By this measure, many areas of Cheltenham (which do not have woodland tree cover) would compare favourably to the national average.



Analysis of our own tree stock shows that open spaces are unevenly distributed across wards, and new planting has not been systematic. This has been determined by investigating categories of measurements which are either taken during routine tree safety inspections or have been applied afterwards for analysis purposes (tree condition, age, size potential, age potential and pollination strategy).

Street trees (more than 6,000 individual trees and several copses) in the Borough are managed by Gloucestershire Highways. Management of this stock shows uneven distribution of the above characteristics (condition, age, size potential etc). While there are limitations to species selection when planting in the highway, the analysis of the stock provides a steer for new planting e.g. to increase the number of long-lived trees in certain areas.

Currently Cheltenham Borough Council and Gloucestershire County Council each contribute £15,000 annually towards tree planting within the highway verge. This results in approximately 70 "standard" (approx. 3-3.5m high) size trees planted annually. The majority of these trees are replacement trees for those previously removed. However, the overall population of highway verge trees are mature and 70 newly planted trees annually is insufficient to maintain the current population level.

Greater tree planting numbers are required - especially of large and long-lived tree species.

[Appendix 1](#) provides a summary of the analysis undertaken of our own tree stock.

Trees in Cheltenham parks, gardens and open spaces

Traditionally, the council has sought and achieved to plant more trees than are removed. However, there are still parks, gardens and open spaces where there is further potential for increased canopy cover. The existence of adjacent sports pitches and other constraints can reduce tree planting potential in some open spaces. Similarly, there are many wide-open spaces whose character would significantly change if the space became dominated by trees. Close engagement therefore takes place between the council's tree and green spaces teams prior to annual tree planting projects.

The following considerations are taken into account when choosing trees to be planted within the public realm:

1. Ultimate tree size.
2. Pruning requirements.
3. Longevity.
4. Resilience to extreme weather events and propensity to failure.
5. Pest and disease susceptibility.
6. Pollinating strategy of a species' propensity to attract insects and other wildlife generally
7. Presence of other trees within the sphere of influence.
8. Perceived nuisance caused by any particular tree species e.g. aphid honeydew, volume of leaf and other tree litter fall, toxicity etc.
9. Local knowledge of species which seemingly grow well in the environs of the location.
10. Desire to vary the palette of tree species locally.
11. Aftercare and maintenance requirements of a species in terms of ease of establishment. Some tree species establish and thrive more easily than others. However, in all instances, at least 1 year's routine and regular post-planting watering and mulching is required so as to aid establishment.
12. Tree root water demand at maturity (if there is a known risk of property subsidence adjacent).
13. Other factors influencing the land e.g. the presence of Sites of Special Scientific Interest or other natural constraints on the land, proximity of sports pitches or other formal and informal areas of play.
14. Adherence to the principle of planting a wide variety of native and exotic trees, large and small species, wind and insect pollinated species, long and short-lived species so as to achieve resilience in terms of pests and disease. Over-reliance on any one particular species risks high percentage mortality rate should a newly introduced pathogen take hold (e.g. Dutch elm disease, ash die-back etc).

Bouncers Lane cemetery

Bouncers Lane cemetery is a Grade II listed garden. It has several avenues of cedars as well as many individual cedars, maples, cypress, cherry and oak. Such trees help provide a mature and tranquil atmosphere within the cemetery. Such large trees also provide shade and calm to those who visit and are a rich haven for wildlife.



Some planting of small ornamental species has taken place within the older parts of the cemetery.

The majority of trees within the remembrance gardens are fully mature and moving into over-maturity. A further pressure on trees within this area is ash die-back. As such, ash tree removal is foreseeable within the next 10 years. A tree planting programme is vital to the sustainable tree population of the cemetery grounds and should include a diverse range of tree species

Leckhampton Hill: felling and planting

Leckhampton Hill is the town's largest open space. Whilst much of it is not within the formal borough boundary, it is managed by the council and has its own [management plan](#).

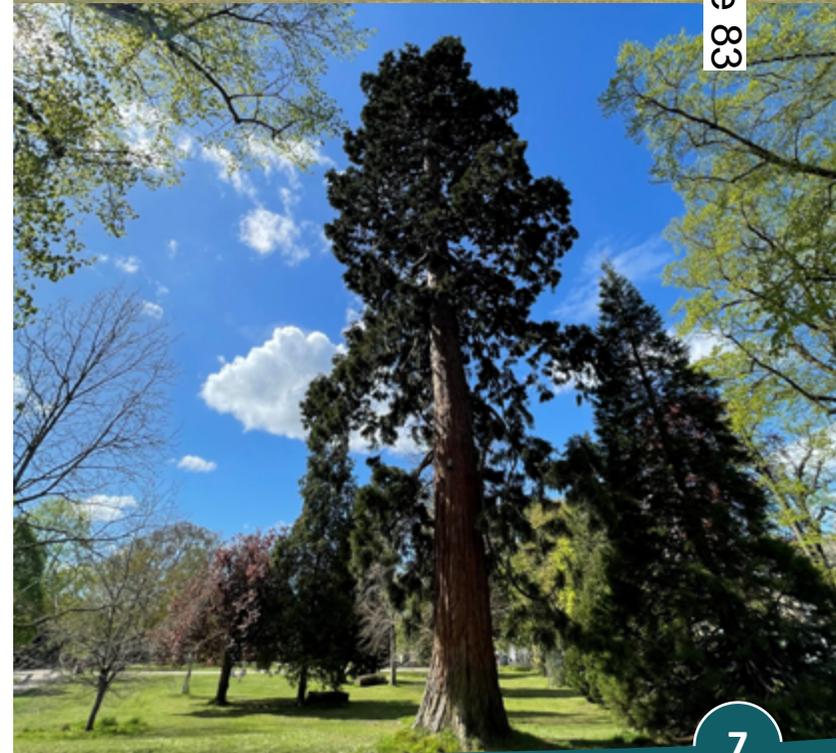
Trees on the hill fall into different areas with beech, maple and ash being the dominant species. However, since 2019, ash die-back has established and many ash have died or are in rapid decline. To this end the council has begun a programme of tree removal of trees which have less than 25% of remaining live canopy and are close to/within falling distance of public paths or other well used areas. Where possible, branch work and timber is left in situ to encourage saprophytic decay organisms as well as return nutrient to the soil. It is recognised that such practice of timber retention rather extraction not only reduces soil damage but helps protect naturally regenerating trees from deer related damage. It is also significantly more economically attractive. Such ash trees have little economic value. In many instances volunteers have successfully created effective "dead hedging" with many of the arisings from such felling programmes and utilised it to help divert paths.

A conscious decision was made to enable natural tree regeneration where ash die-back related tree felling has taken place on Leckhampton Hill. It has become apparent that the species of tree which is regenerating most prolifically is sycamore. This is a naturalised and pioneering species which can

grow to a large size (20m +) and age (150+ years). However, it is anticipated that other naturally regenerating species will include other species of maple, hornbeam, hawthorn and beech. However, it is recognised that careful management (woodland thinning) of regenerated trees will be necessary so as to ensure trees of good quality are retained at the expense of "lesser" quality trees as well as ensuring that different areas on the Hill rejuvenate with a mixture of species.

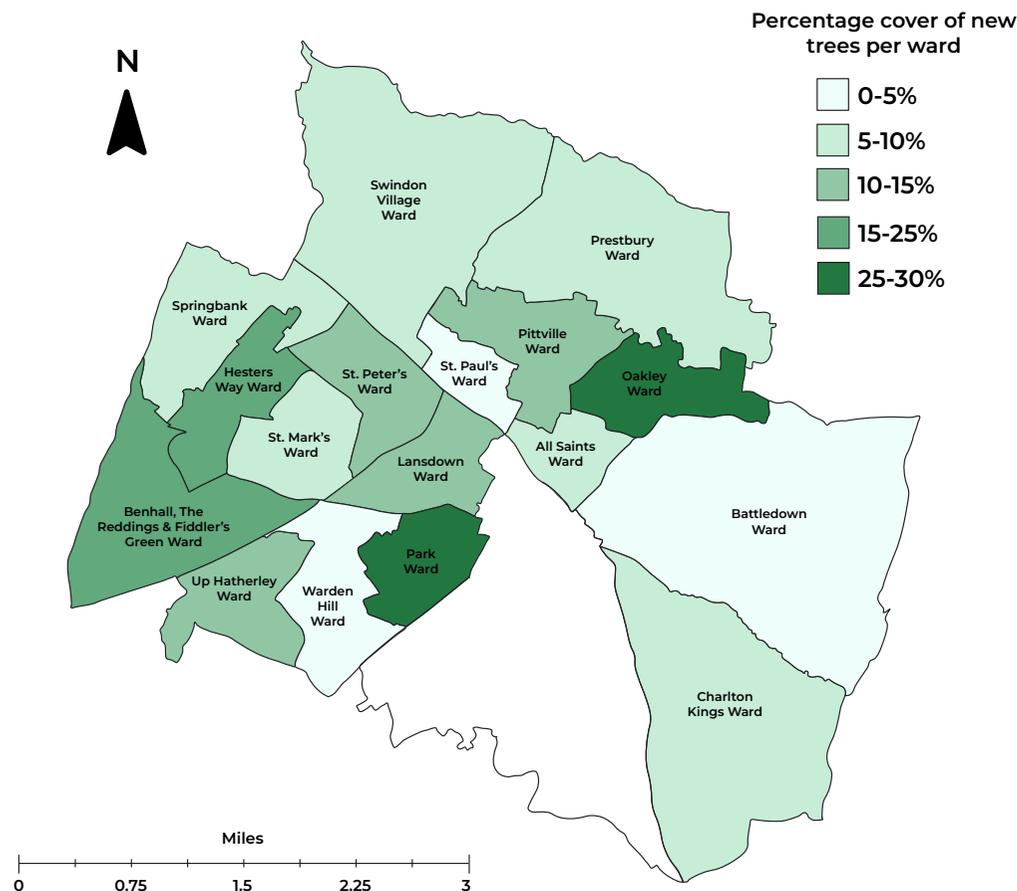
Experience has shown that the Hill has a high number of varying users (from dog walkers, ramblers, mountain bikers, to natural history and geology enthusiasts). It is fair to say that there is something for everyone on Leckhampton Hill. [Friends of Leckhampton Hill](#) (FOLK), as the community-based organisation for all such interests, will be consulted with and informed of significant felling and tree works prior to work commencement. Similarly, where and when appropriate, the council website will be updated as well as site notices explaining the works so hill users can be aware of the good intent of council tree works.

Leckhampton Hill is now being formalised as a formal NNR. Consultations regarding significant work on the Hill will be undertaken in line with the Consultation protocol agreed between the council and Friends of Leckhampton Hill (FOLK). <https://www.cotswolds-nl.org.uk/our-work/cotswolds-national-landscape-management-plan/>



Housing forecourt tree planting

There is a rich tapestry of trees on the council's housing forecourt land. There is also a wide variety of species, age class and are mostly in a reasonable physiological and biological condition.



The council's tree team organises tree planting on housing land in its ownership annually. This includes liaison and agreement from adjacent tenants.

There is considerable scope for further tree planting on housing forecourts. In many instances such forecourts are on land which has a lower socio-economic score as well as higher air pollution and health rankings.

Tree planting sponsorship

The council runs a [tree sponsorship scheme](#). This enables members of the public to pay for a sponsored tree to be planted. The current approach is that sponsored tree planting is provided at Cheltenham cemetery, where sponsors can have an oak tree planted and can have the details recorded formally within the chapel's book of remembrance. This provides a sensitive location for loved ones to pause and reflect.

Private trees

Thousands of trees have legal protection in Cheltenham via tree preservation orders (TPOs), in general these are in private ownership. The borough council holds records of nearly 550 active TPOs (most of which cover multitudes of trees).

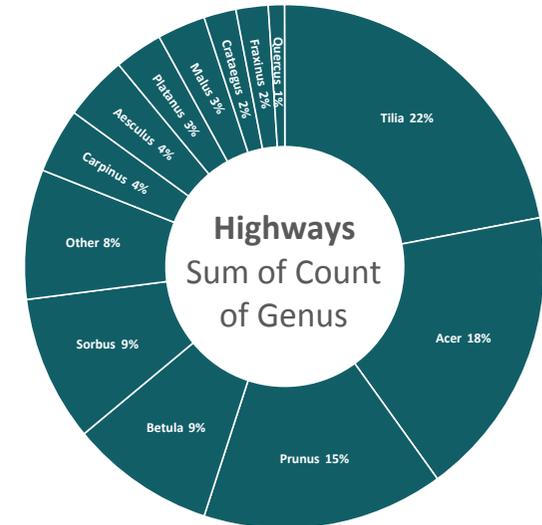
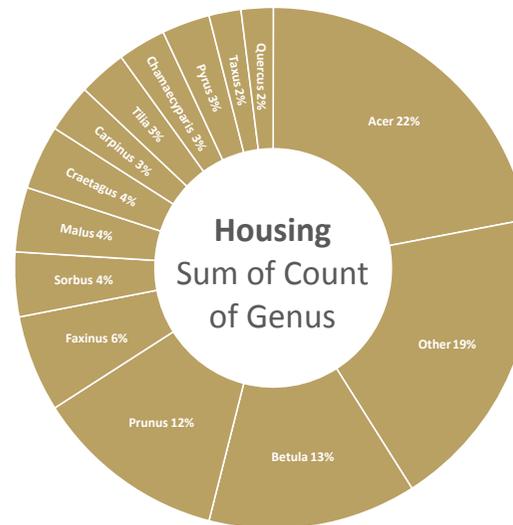
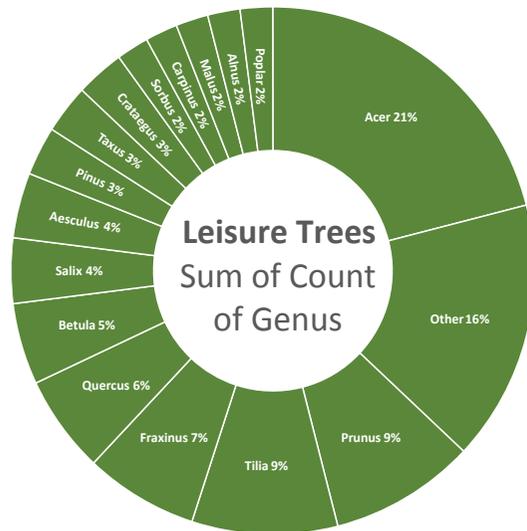
There are 7 conservation areas in Cheltenham: Bafford (Charlton Kings), Central, Cudnall Street (Charlton Kings), Poets (St Marks), Prestbury, St Mary's (Charlton Kings) and Swindon Village. These represent 684 ha of land, covering 15% of the borough. Completed developments have new trees protected by condition of planning consent, although this is usually only for the first five years after planting.

Current analysis of private tree area cover in Cheltenham is not as extensive as for public tree area cover, and relies on data from national sources e.g. Forestry Research papers on [canopy cover](#) and [trees outside woodland canopy cover](#). Better understanding of this element of the town's tree stock may be necessary in future drafts of this strategy. However, it's clear that private trees make a substantial contribution to the canopy cover in the areas of town which have higher tree equity scores.

Part 2: Developing the strategy

Summary analysis of Cheltenham tree stock

A wide range of data and sources have been reviewed to inform this strategy. This is set out in appendix 1.



It can be seen that there is association with areas of low employment, health and income with areas of greatest tree planting potential. As such, priority to tree planting should be given to areas with low tree equity scores. Therefore, a key aim of the strategy is to reduce the disparity of canopy cover percentage between borough wards whilst at the same time increasing the overall canopy cover. A high-level analysis is provided in the table below.

Strengths

- There is a healthy mosaic of existing trees in the town, both in public and private ownership
- The council's own trees are in good condition overall
- We have excellent knowledge of our own tree stock

Opportunities

- There is broad scope for new tree planting in public spaces and private developments
- Gloucestershire County Council is currently subsidising tree planting across the borough
- Increased public awareness is leading to a greater sense of importance of trees

Weaknesses

- There is a clear inequity between areas in regard to canopy cover
- There is a maturing population of large trees in public places with insufficient succession planting in places
- There is a lack of diversity of species in some areas, especially highways' trees
- Management of highways' trees has a reduced capacity compared with historic allocation

Threats

- Climate change presents challenges in establishing new trees (longer, drier summers) and newly introduced tree pathogens
- A lack of diversity in some areas of the stock represents a vulnerability to tree loss through new pathogens (ash die-back etc)
- Increased pressure to develop land at expense of space for significant new tree planting is exacerbated by Cheltenham's lack of 5-year housing plan

Vision and principles

Through our engagement with communities and stakeholders alongside the deep dive into the data available a vision and set of principles were developed. These will both guide the tree strategy and which will be one of our benchmarks in monitoring and review.

For the benefit of our town's environment now and into the future we will work to achieve a well-managed and sustainable urban forest in Cheltenham, to benefit the town's arboricultural amenity value, ecological balance, economic prospects and social well-being.

To deliver the vision the following tree management principles will be followed:



Enhance Cheltenham's tree population through careful species selection, planning, and community engagement: always aiming to maximise canopy cover while respecting local conditions and the Borough's rich heritage



Manage our own tree stock in a consistent, organised and proactive way: using evidence-based approaches



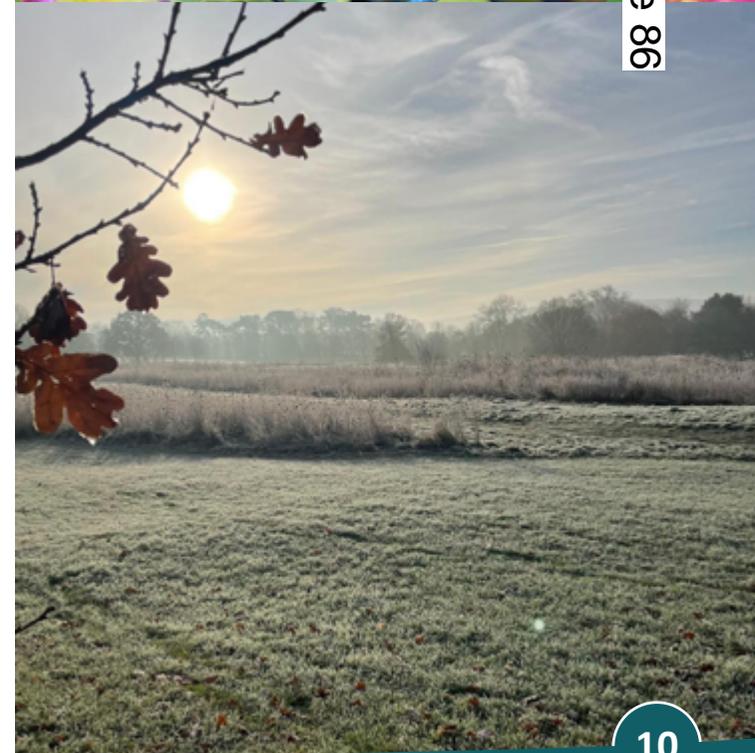
Promote the right tree in the right place: planting appropriate species and numbers to reflect the site's conditions and future growth potential



Ensure replacement planting is meaningful: with a focus on long-term canopy contribution rather than just numbers



Protect trees through the planning system: guided by analysis of local tree population



Relevant policies

At a national level the [NPPF](#), Section 15 conserving and enhancing the natural environment, sets out some key principles which focuses on habitats and viability, this includes assessment and understanding of the loss or deterioration of irreplaceable habitats such as ancient woodland and ancient or veteran trees.

This tree strategy will optimise the efficient management of the borough's own stock of existing trees together with linking into the wider policy context including:

- Cheltenham's statutory development plan ([Gloucester, Cheltenham and Tewkesbury Joint Core Strategy](#), [Cheltenham Plan](#) and the emerging Cheltenham, Gloucester and Tewkesbury [Strategic and Local Plan](#))
- Cheltenham's [green space strategy](#)
- [Leckhampton Hill management plan](#), [Pittville Park management plans](#), [Montpellier Gardens management plan](#)
- [Climate change supplementary planning document](#)
- Nature recovery supplementary planning document
- [Gloucestershire local nature recovery tree strategy](#)
- The Gloucestershire tree strategy
- [The England tree action plan 2021-24](#)
- Cheltenham's heritage project action plan

In addition, climate leadership Gloucestershire have recently published a climate risk and vulnerability assessment. Within this report the following risk to and from trees are identified:

- High temperatures and heatwaves are causing a rise in fungal diseases on plants.
- A rise in ash die-back has significantly impacted roadside safety as unstable trees are more likely to collapse onto roads causing disruption and injuries. This may be exacerbated by climate change creating ideal conditions for disease and pests which cause die-back
- High winds and storms may also cause tree uprooting. Fallen trees not only impact habitat connectivity and wildlife but also pose a risk to human life and property also
- Surface water flooding, river flooding and sea level rise have the potential to damage woodland by causing waterlogged soils leading to plant stress and increased potential vulnerability to diseases
- Floodwaters from all types of flooding can deposit sediments and pollutants on soil quality causing an inability for woodland to regrow again
- Falling debris, such as trees or increased leaf fall, on to roads and railway lines during storm events, may also result in transport disruption. Leaf fall can result in trains being unable to accelerate and brake effectively
- Stakeholder interviews noted that the growing season has been stunted with reporting of 30% loss of 200,000 trees planted due to an 8-week dry period.

Green infrastructure is identified as both a mitigation and adaption measure. The following adaptation projects have been identified within the report which this strategy aligns with:

- "Trees acting as windbreaks and for shading which are resilient to future conditions of drought and flooding. For example, tree species such as aspen, Corsican pine and field maple are commended by the Forestry Commission as 'species of the future'".
- "River buffer zones and riparian trees to reduce river water temperatures through shading and evapotranspiration".

Aims of the tree strategy

The fundamental aims of this tree strategy focus on creating a forward thinking and sustainable approach to managing, preserving and expanding tree cover across Cheltenham and include:

Increase tree canopy coverage: One of the primary aims is to address the disparity of canopy cover across Cheltenham. This involves looking at a broad range of data including tree equity data and inspection data etc to better inform the location and planting of trees in spaces where they make a social, environmental and economic contribution. This will help to expand canopy cover and contribute to environmental health. This aim will also inform decisions in the planning process to better protect trees on private land. This should be achieved through diversity of species and characteristics of Cheltenham's tree stock.



Enhance biodiversity: Trees support a wide range of plant, animal, fungal and bacteria species. A key aim of this strategy, feeding into our nature recovery strategy supplementary planning document, is to increase biodiversity by planting a broad range of tree species, which provide habitats for wildlife and contribute to ecological resilience.



Help mitigate climate change: Trees are important for absorbing carbon dioxide (CO₂). Cheltenham has a commitment to carbon net zero by 2030. By maintaining and increasing the number of trees that can sequester carbon, and reduce heat island effects in our urban area, we can help mitigate climate change and help regulate our local climate.



Improve air quality and mitigate flood risk:

Trees act as natural filters, improving air quality by collecting pollutants and releasing oxygen. They also help manage water runoff and reduce the risk of flooding by slowing the flow of rainwater into drains, streams and rivers.



Enhance health and well-being: Trees are important to our communities. They support both our mental and physical health. Urban trees help create attractive areas, whilst trees in our green spaces enhance these spaces, create areas for recreation, reducing stress and encouraging outdoor activities.



Protect and maintain existing tree stock: A key part of any tree strategy is the preservation of existing trees. This involves robust inspection and maintenance, good biosecurity measures and ensuring we plant the right tree for the right place so that full crown potential can be achieved.

Promote education and awareness: This aim will help to engage local communities with the broader understanding and a sense of ownership of their environment.



Maximise funding: This trees strategy can be used as a lever for funding for future tree management.

Part 3: Tree strategy policies and actions

The tree strategy is divided into two key components:

Tree management policies: These outline the principles and standards we will follow in the management of trees owned or maintained by the council. They guide our day-to-day operations, risk management and long-term stewardship of the borough's tree stock.

Trees in planning action plan: This sets out how we will proactively engage with the planning process to protect existing trees, promote new planting and ensure that trees are fully considered in the design and delivery of development across the borough.

Together, these components provide a comprehensive framework for safeguarding and enhancing the contribution the council can make to planting, managing and safeguarding trees across the borough.

Tree management policy 1: tree retention

Given the wide range of direct and indirect benefits of trees to the borough and its inhabitants, council trees will be retained whenever possible. A tree's particular value in any landscape, particularly in low tree cover density neighbourhoods, will be taken into account prior to any felling. Nevertheless, alternatives will be explored by the council's specialist tree team prior to any felling on each occasion and there is a general presumption against the removal of trees unless there is a sound arboricultural reasoning.

Tree management policy 1: tree retention

Presumption in favour of tree retention: We will prioritise the retention of healthy, structurally sound trees wherever possible, recognising their long-term value to the community and environment.

Should a tree require removal we will:

1. Explore pragmatic alternatives to felling that are proportionate to the tree's value.
2. Recognise that retention of dead trees for wildlife habitat is a legitimate management option in some circumstances.

Each case will be judged on its merits and appropriately recorded.

Tree management policy 2: tree planting

Central to our approach is that tree planting and establishment should achieve a balance between site conditions, tree selection and good working practice. We will do this by:

- Maximising the overall area of sustainable tree canopy cover with focus on areas where there is greatest need
- Diversifying the number of different tree species and age ranges within the overall population
- Achieving a resilient tree population in the face of a changing climate and increased levels of threat from pests and pathogens
- Anticipating and minimising future levels of inconvenience potentially associated with the newly planted trees

A key part of this process is to develop a detailed understanding of the land that we own and its potential suitability to sustain new tree planting for the long-term.

There are three main stages:

Stage 1: Identification of all potential planting sites:

We shall work with stakeholders including Gloucestershire Highways to identify viable locations to establish trees. This shall involve consideration of, for example, disability discrimination act (DDA) compliant pavements, utilities close to the surface beneath roads and potential for EV charging equipment on or off street.

Desk-based research: This is the starting point for identification of potential planting sites and includes:

1. Identification of all council green spaces on a ward-by-ward basis using existing GIS mapping facilities.
2. Assessment of each area using aerial imagery and/or online 'Street View' tools to identify if space exists for tree establishment.
3. Gathering of pro-forma information: ground covering (grass/hard surfacing), approximate available space, preliminary assessment of suitability for tree planting.
4. Where desk-based results are limited or inconclusive, a preliminary site visit shall be carried out to complete the assessment.

On site: Aid the process of identifying all empty tree pits within highway pavements and other public hard surfaced areas. It should be noted that empty tree pits may be temporarily tarmac filled for trip hazard management but do remain viable. As such they will continue to be listed on our databases as planting locations.

Stage 2: Evaluation of potential tree planting sites:

Sites identified as having a potential for tree establishment will be subject to undergo viability assessment to support decision-making regarding tree species/stock selection, site preparation and maintenance. Key aspects:

- Ground assessment
- Climatic factors
- Existing above and below ground features.

Stage 3: Tree species selection

Tree species selection will follow the principle of the ‘right tree in the right place’. To achieve this, we shall utilise guidance including that published by the [Trees and Design Action Group](#) .

Where appropriate we shall also consider the site’s suitability for tree establishment and ecological enhancement by natural regeneration. We recognise that native tree species can be highly important in terms of their wildlife associations. However, due to their vulnerability to imported pests and pathogens we shall not exclusively plant ‘native’ trees.

With the continued unprecedented rise of imported tree pests and diseases entering the UK (Oak processionary moth, ash die-back and several Phytophthora species etc), it is more important than ever to ensure that new trees for planting within Cheltenham are pest and disease free at the time of acquisition.

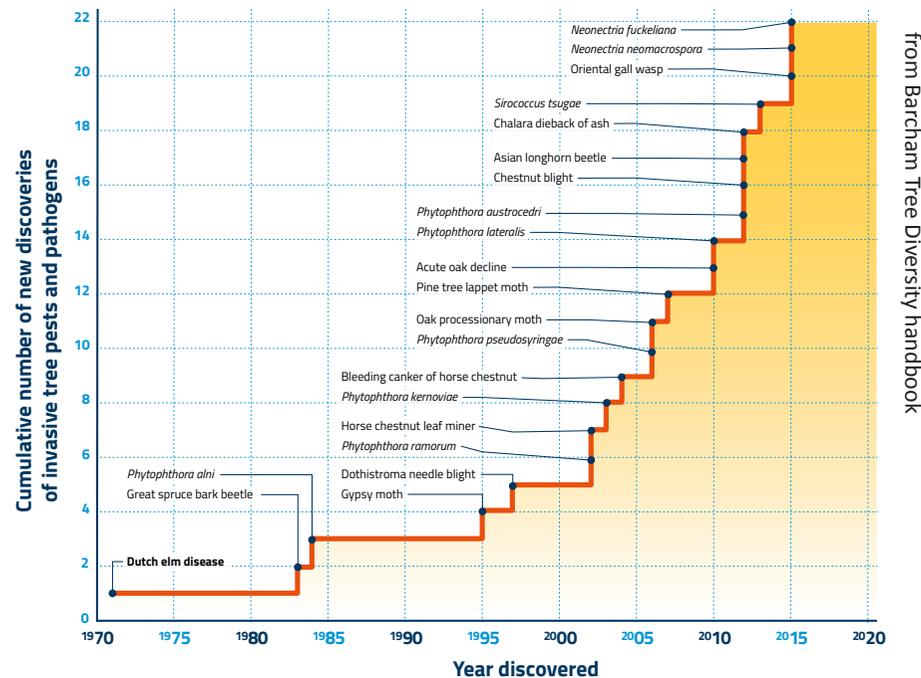


Figure 1: Indicating known findings of unwanted tree pests and pathogens in the UK since the 1970s (updated and compiled by J. Roberts based on the original work of Dr. J Webber).

To this end, trees will only be sourced which have had accreditation from the Defra-endorsed Plant Health Alliance’s Plant-Healthy Certification Scheme. However, such certification will not be necessary if trees have always been grown in this country prior to sale. Trees from seed of local provenance will be favoured over foreign imported origin.

Tree management policy 2: Tree planting

Tree planting on council land: Priority consideration will be given to new trees planting in wards with relatively lower tree equity scores to work towards addressing the disparity in canopy cover across the borough. We will do this by considering the tree equity scores as part of the assessment of the council's annual tree planting programme.

Tree planting specification: We will use clear and suitably detailed specifications for planting, supporting and protecting new trees to be established on our land.

Tree planting requirements vary greatly depending on the size and form of the tree and the site conditions. Transplants or 'whips' are relatively straightforward to plant, support and protect, whereas larger trees represent greater investment and require a more considered approach depending on the setting. We shall plant all trees in response to site conditions and in accordance with best industry practice. We shall make specific reference to the principles and practices detailed in BS8545:2014 – Trees: from nursery to independence in the landscape.

Key considerations are:

1. Planting pit design and backfill.
2. Support and protection for the new tree.
3. Tree species choice (for location and also diversity/strengthening of tree stock going forwards.)
4. Appropriate mulching, irrigation and aeration.
5. Protection of trees from vandalism/trimmer damage.

Replacement planting prioritisation: We will wherever possible replace trees according to the following priority:

1. TPO -protected trees.
2. Trees removed from areas with of comparative low tree equity score.
3. Trees within the conservation area.
4. Replacement trees elsewhere.
5. New tree planting.

Sourcing of trees: Trees will be sourced with "plant healthy" certification. Alternatively, trees will also be sourced where there is a strong confidence that trees are from sources of trees of local provenance and have been locally grown, e.g. trees grown by Cheltenham Tree Group, Gloucestershire Orchard Trust. Similarly, Gloucestershire Orchard Trust are able to provide trees of historic and cultural significance to an orchard environment. The council will support the planting of these heritage species where appropriate.

Tree management policy 3: tree establishment

Tree management policy 3: Tree establishment

Planting, aftercare and the ultimate establishment of newly planted trees: We will ensure newly planted trees are supported through establishment with appropriate aftercare and monitoring.

We recognise that post-planting aftercare is essential for new tree establishment. Therefore, at suitably regular intervals we shall seek to ensure that all newly planted trees are appropriately:

1. Supported.
2. Watered.
3. Mulched.
4. Protected from damage (eg from vandalism, strimmer use etc).
5. Formatively pruned.

Post planting resource requirements will vary year on year in order to achieve these aims.

We shall work with community groups and other stakeholder to inform the choice of tree species and how to best help establish them.



Tree management policy 4: tree pruning

Trees under the ownership of the council have enjoyed a long tradition of attaining their natural size and form. Inappropriate trees are removed when necessary and overall, the population as a whole has been treated in line with industry good arboricultural practices.

However, there are instances where requests to prune are made by those who live closest to the trees as it is considered that the trees pose a degree of perceived nuisance, including:

- Leaves, twigs and other “tree debris” falling into the property.
- Shade cast by the tree.
- Views blocked by trees.
- Pollen shed by trees impacting human health.
- Partially blocked TV reception.
- Trees being too “big” leading to neighbour concerns.
- Trees impacting on the efficiency of solar panels.

Such impacts are usually “seasonal” nuisances or impacts which can be rectified without the need to prune the tree. Specifically, in regard to the installation of solar panels, this issue should be dealt with by the installer and any shadow informing the positioning of the panels.

This contrasts with other legally actionable nuisances which a tree or trees may have on an individual, neighbourhood and area. Other nuisance can range from direct impact such as:

- Being struck by a tree/branch.
- Damage to property as a result of direct impact (falling trees/branches).
- Trees in direct contact with property and causing damage to the property.

Similarly, trees can have an indirect impact on property through the shrinkage of clay underneath the property through the action of tree roots removing moisture from the soil.

Such legally actionable nuisances will be addressed as a priority.

Tree management policy 4: tree pruning

Pruning of the council’s trees will follow a process of prioritisation following individual sites assessment:
Trees will be pruned or removed according to available resource in the following prioritised order:

1. Pruning/removal of trees to ensure the risk to the safety of persons and/or property is kept to the principle of “as low as reasonably possible.”
2. Pruning/removal of trees to address legally actionable nuisance.
3. Pruning of trees to improve their appearance and amenity.
4. Pruning for other reasons such as improving TV reception, perceived overbearance, photovoltaic efficiency, reduced tree litter etc.

Pruning will be undertaken in line with BS 3998 (2010) (unless the only other alternative is full removal of a tree) by an appropriately qualified and experienced tree works contractor. Such contractors working on behalf of the council will work to industry best practices and comply with the policies within this strategy.

Tree management policy 5: managing tree-related impacts

The management of the council’s tree stock, including tree safety is addressed in the [trees inspection protocol](#) (August 2024). This addresses the management of safety of the council’s own stock of trees.

The results of safety-based surveys not only identify defects within trees and where necessary, remedial works to address these defects as well as pro-active pruning works to abate nuisances ranging from branches partially blocking footpaths, to pruning to abate a known serious nuisance such as clay related subsidence to properties.

We recognise that trees can occasionally cause concerns for residents and damage to structures. Our approach is to manage these issues proportionately, balancing individual concerns with the wider public, environmental and amenity value of trees.

Direct damage can be the result of trees, or parts of trees falling and hitting property. Similarly, tree roots can grow and disrupt paving stones, pavements etc or else their branch work can grow and come into direct contact with structures (roofs, windows, pipework etc).

Indirect damage occurs as a result of the action of tree roots taking water from the soil within the zone of influence of a tree. If the soil within this zone of influence is shrinkable clay soil, such water uptake by tree roots can cause seasonal soil movement (shrinkage and expansion) which can impact the foundations of a property if they were not created at sufficient depth to enable stability.

Generally, soil will re-wet in the winter when there is greater rainfall and the tree is dormant. Conversely, trees can dry out soil when their roots are active and rainfall is less. This causes clay soil to shrink. Such cyclical movement of the soil can cause properties (or parts of properties) to move and crack.

There are pockets of clay soil all around Cheltenham. The precise location and depth of such soil is difficult to predict. The movement of a property is dependent upon many variables:

1. The nature of the property and the foundation design (appropriately deep foundations are a relatively new phenomena).
2. The nature of the adjacent soil. Some clay soils are more shrinkable than others and the distribution and nature of such clay varies in location and soil depth.
3. The size or the species of tree. Some trees are more water-demanding than others. Similarly, a large tree will draw more water from the soil than a small tree.
4. Inputs and outtakes in ground water. Rainfall is the primary source of groundwater in the soil. Other than adjacent to other sources of water, when there is little rainfall, there is little ground water. Similarly, periods of intense sunshine and heat can cause significant evaporation of water from the soil.

5. The impact of other vegetation on soil. Herbaceous and other small perennial plants can also draw significant volumes of water from the soil.

The behaviour of tree roots within soil is influenced by many uncontrollable variables, making accurate prediction of subsidence not possible. However, the council acknowledges its duty of care and will respond appropriately to evidenced claims of subsidence linked to trees under its ownership or management.

Tree management policy 5: Managing tree-related impacts

We will respond proportionately to claims of nuisance caused by council-owned trees. The level of evidence required to support such claims will reflect the value, condition, and public benefit of the tree in question.

Where appropriate, we will:

- Investigate complaints in line with legal obligations and best practice
- Require clear, evidence-based justification for requests involving significant pruning or removal
- Balance individual concerns with the wider public amenity and ecological value of the tree.

Tree management policy 6: record keeping

Effective tree management relies on accurate, consistent and accessible information. Maintaining detailed records of inspections, maintenance activities, and remedial works is essential for ensuring the safety, health and sustainability of the council's tree stock.

Good record keeping enables the council to:

- Monitor tree condition over time
- Prioritise resources based on risk and need
- Demonstrate compliance with legal and health and safety responsibilities
- Provide transparency and accountability to the public.

Tree management policy 6: record keeping

We will maintain accurate and up-to-date records of all tree inspections, maintenance activities and remedial works. This ensures transparency, supports effective decision-making and enables compliance with legal and safety obligations.

We will do this by recording:

- Consistently using electronic systems
- Linking inspection cycles to risk assessments clearly so that records can be made available for internal review and public access where appropriate
- We will review our archive and move towards digitising these records to safeguard them for the future.

Tree management policy 7: Community and Stakeholder engagement

Recent years have seen many and varied volunteer community groups come into existence.

Similarly, primary and secondary school volunteer groups achieve a very good tree and hedge planting success rate. This community activity:

1. Fosters a sense of ownership of the trees.
2. Helps build community relationships and pride in the local environment.
3. Creates a direct school-based curricular connection with nature and the soil as well as helping to generate understanding of tree species and the impact of climate change on nature. Such practical application of school-based learning is welcome and the benefits of such applied learning experiences are long lasting.

Engagement with adult volunteers will be prioritised in areas where there is less scope for household tree planting and aftercare in schools with no/little green space.

It has been recognised that trees and re-wilding take place efficiently using self-sown naturally regenerating trees. Where appropriate, such natural re-generation should be encouraged whilst still employing good arboricultural practices.

Management Policy 7: Community and stakeholder engagement

We aim to increase community and stakeholder engagement in order to maintain the profile of trees in relation to the borough: We will strengthen community and stakeholder involvement to raise the profile of trees across the borough. This will be achieved by working closely with the council's green spaces team and supporting friends groups and other local partners such as Cheltenham Tree Group.

Tree management policy 8: Compensation for damaged / destroyed trees

Council-owned trees are valuable public assets that provide a wide range of environmental, social and economic benefits. When these trees are damaged or destroyed, whether through negligence, unauthorised works, or deliberate acts, it represents a loss to the wider community. By seeking appropriate compensation and, where necessary, pursuing enforcement action under relevant legislation, we aim to:

- Deter future damage to public trees
- Recover the value of lost or harmed assets
- Reinforce the legal protections afforded to trees.

This approach supports the long-term protection and sustainability of the borough's tree stock.

Tree management policy 8: Compensation for damaged / destroyed trees

We will seek appropriate compensation from any external party responsible for the damage or destruction of council-owned trees. Where necessary, we will pursue enforcement action under relevant legislation to ensure accountability and deter future harm.



Trees in planning: Action plan

This action plan sets out how the council will proactively engage with the planning process to raise the profile of trees and embed their value in decision-making. It supports the delivery of the wider Tree Strategy by focusing on four key areas:

Stakeholder engagement: Strengthening collaboration with developers, planners and the community to promote tree-friendly development.

Data management: Improving the quality, accessibility and integration of tree-related data to support planning decisions.

Trees in planning applications: Ensuring appropriate tree retention and increasing canopy cover through robust planning controls.

Tree preservation orders and conservation areas: Using statutory tools to protect trees of public amenity value.

Together, these actions will help secure long-term benefits for people, places and nature through better planning for trees.

Tree strategy action 1: Stakeholder engagement

To improve engagement with stakeholders to raise the profile of trees in the planning process.

We will do this by:

- Playing an active role in the preparation and review of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan
- Providing guidance on tree-related planning policies to support effective delivery
- Promote early engagement on tree matters in pre-application discussions
- Ensure guidance available via the council's website is regularly maintained and updated to ensure that applicants and members of the public have the most up to date information and guidance available
- Actively using the council's communication channels to help increase the visibility of tree protection issues
- Ensuring training for elected members is built into planning committee and new member induction training together with creating wider opportunities for training on tree preservation orders, conservation areas and trees in planning issues.



Tree strategy action 2: Data management

Ensure accurate records and make them easily accessible to the public where appropriate. We will do this by:

- Utilising UKSPF funding to fully update information held in respect of tree preservation orders
- Maintain an up-to-date digital inventory of protected and notable trees
- Integrate tree data with GIS and planning systems
- Publish relevant data for public access where appropriate.

Tree strategy action 3: Trees in planning applications

Retain appropriate trees and increase canopy cover through development. We will do this by:

- Require tree surveys and impact assessments for relevant applications, referring to the most recent BS5837 as the basis for assessment
- Secure tree retention and planting through planning conditions and legal agreements.

Tree strategy action 4: Tree preservation orders and conservation areas

Protect trees of public amenity value through statutory mechanisms. We will do this by:

- Proactively review and update tree preservation orders
- Ensure timely responses to applications to work on trees protected by tree preservation orders and conservation area notifications
- We will refer to the most recent BS3998 as the basis for assessment.
- Provide clear guidance to applicants and residents
- In line with our planning enforcement plan, we will where appropriate enforce legislation which protects trees.

Part 4: Monitoring and review

Timetable for review

To ensure the strategy remains effective and aligned with its aims, progress will be reviewed at regular intervals:

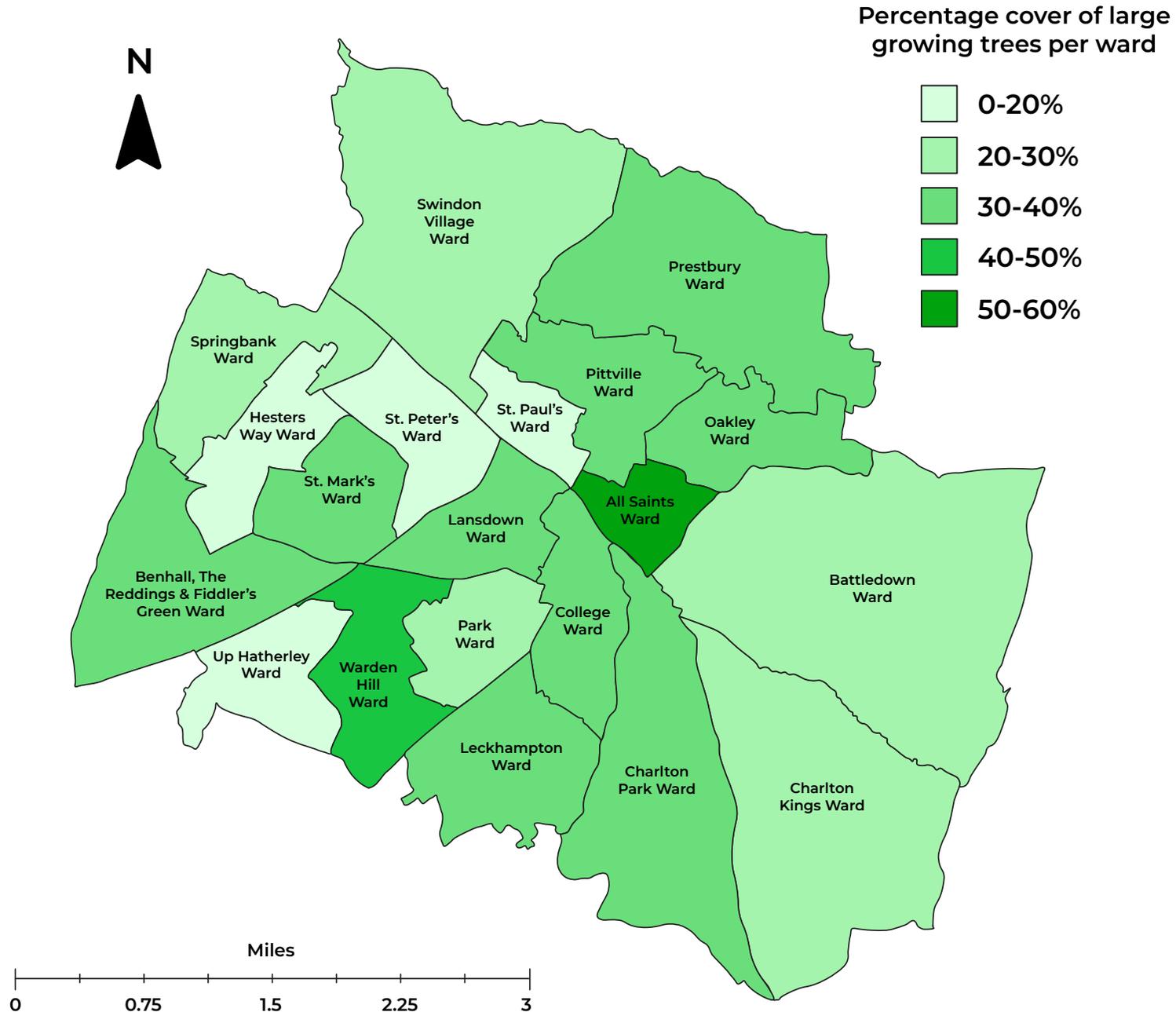
- Initial review: Tree population data will be assessed after one full inspection cycle (every 4 years) to evaluate early outcomes
- Ongoing review: A more comprehensive review will follow every 8 years, aligning with two full inspection cycles.

This schedule reflects the gradual nature of canopy growth and allows time to assess the impact of external factors such as pests, diseases, and extreme weather events.

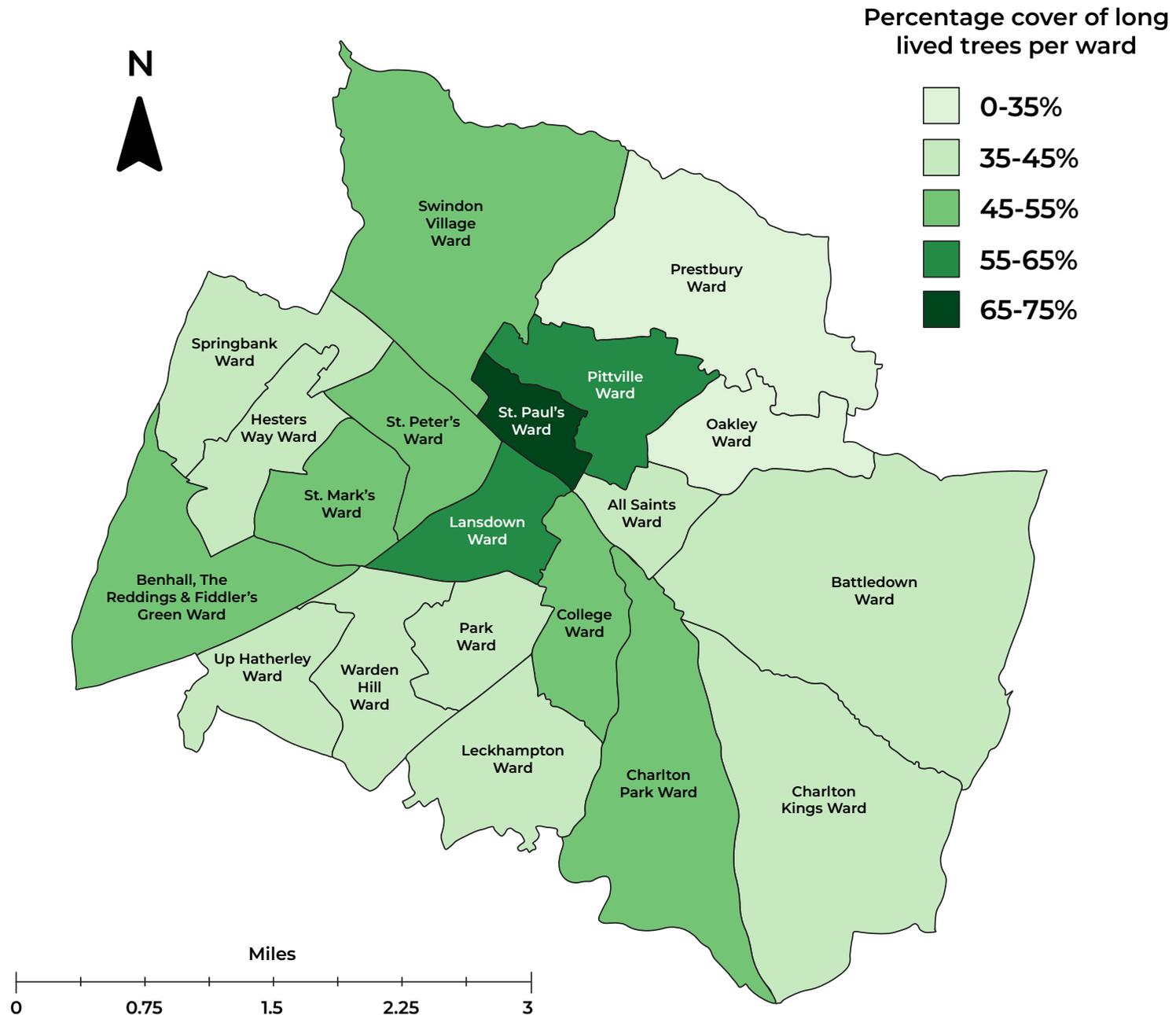


Appendix 1: Tree maps

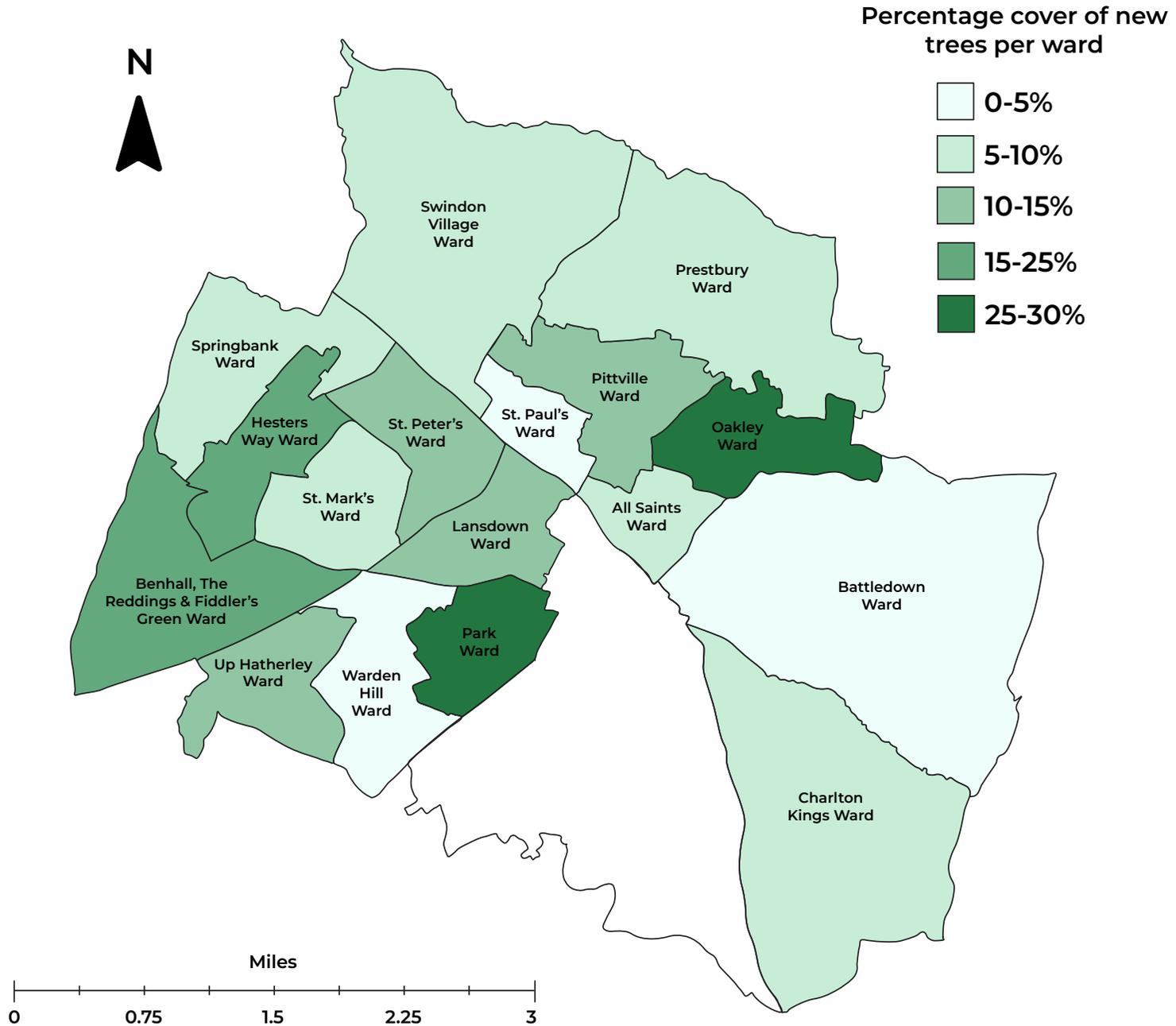
Leisure:



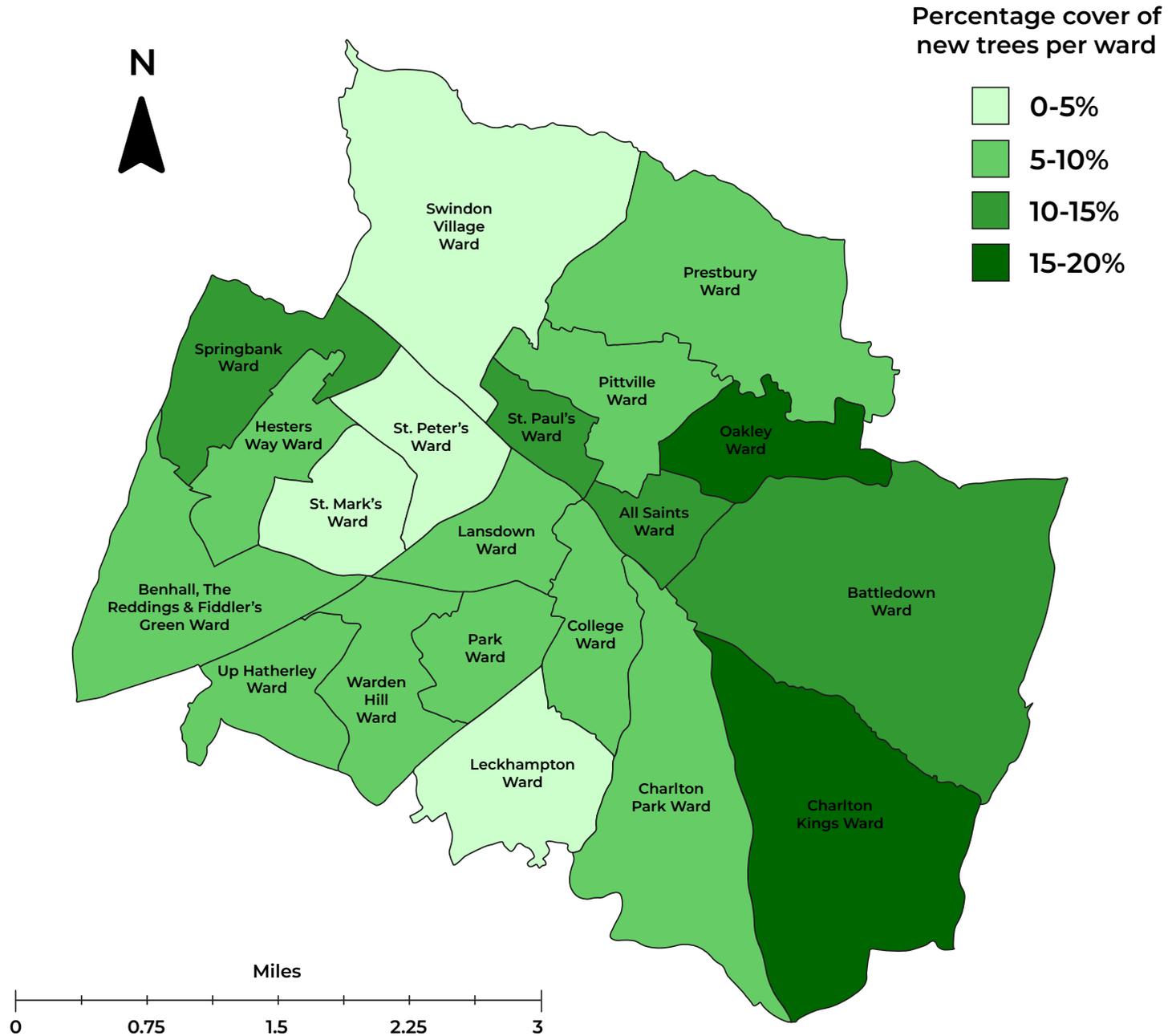
Leisure:



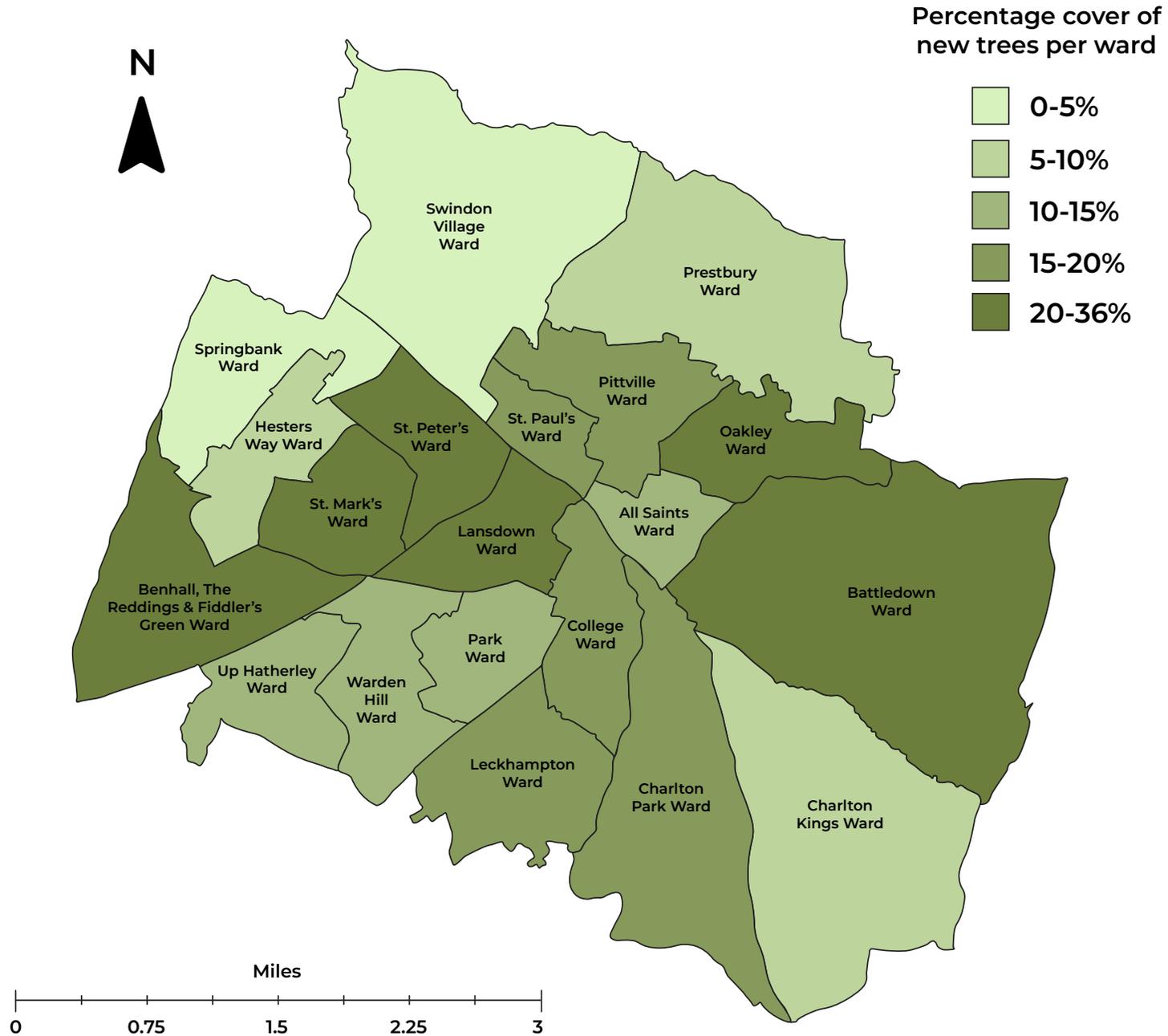
Housing:



Highways:



Leisure:



Appendix 2: Tree data headlines

Data for leisure, housing, cemetery, car park trees is accurate as of November 2024.

Data for highways trees is accurate as of February 2025.

Leisure:

Trees per site

The council manages **183 sites** (although it should be noted these are not all the same size and some – e.g. Pittville Park – are split into smaller sites for ease of management, so comparisons should be made with this in mind). Across these 183 sites, **the council manages 5751 trees**. Obviously, hedges are not counted although hedges are often formed by heavily pruning trees. Groups of trees are sometimes managed as a single entity and this must be kept in mind when reading the data. **The average number of trees per site is 31.4.**

All Saints has the lowest tree / site at 8.5.

The following Wards are in the lowest quartile for t/s (lowest to highest):

- All Saints
- St Paul's
- Springbank
- Up Hatherley
- Charlton Kings

Pittville has the highest t/s (67.7).

Maturity

Maturity stages of trees in the council's management are categorised 1 to 6 with 1 being newly/recently planted trees to 6 being over-mature. **Across the borough, the 1.7% of trees are over-mature**, a low figure commensurate with the nature of managing very old trees in urban spaces.

The Ward with the lowest percentage of maturity 1 trees is Springbank with 3.7% (the average for the Borough is 15.4%).

The following Wards are all below average:

- Springbank (3.7%)
- St Peter's (4.9%)
- Hesters Way (6.1%)
- Charlton Kings (9.7%)
- Battledown (10.9%)
- Park (11.3%)
- Swindon Village (11.6%)
- Up Hatherley (11.8%)

This gives a clear steer on where new planting should be focused in the coming years.

Condition

The condition of trees is often, if not usually, linked to maturity of trees but may not be – trees get damaged by 'mechanical' means, by pathogens, by abiotic factors, climatic conditions and so on. We can safely assume that new trees should be in excellent condition and planting new trees would increase the percentage of good condition trees. It should be noted that poor condition trees may not have high amenity value but they may have high habitat or wildlife supporting value – the importance of veteran trees is only partly cultural and in the main their significance is as irreplaceable habitat for specialist minibeasts and the ecosystems that they support.

When surveying trees, they are assigned a score 1-4 (1 being excellent, 4 being very poor)

In total, most of Cheltenham's trees are rated 2 (62%) a good proportion are rated 1 (30.6%). Only 6.3% are rated 3 and 1.3% are rated 4.

Only St Mark's has a significantly higher than average percentage of grade 4 trees (4%). Even this may be considered statistically insignificant though.

Size potential

If a driving force behind urban planting is the desire to increase canopy cover to mitigate the effects of climate change, size potential is an important factor in decision making and local policy. Trees were rated small (potential eventual height below around 10m height in an urban setting), medium (10-20m) and large (20m plus). No differentiation was made for massive trees (30m plus). No differentiation was made for potential canopy spread, likely leaf density, evergreen/deciduous foliage (all of which would have some impact on benefits of canopy cover) and these limitations to the data must be accepted. Note also that many trees may not reach their full potential or may need to be managed due to how they interact with the built environment.

Most of the leisure trees in Cheltenham have the potential to be large (68.9%).

Around 1/5th have the potential to be medium sized (19.5%).

And 11% will remain small trees. (No accurate data was available for 2% of trees where nomenclature has not been formally identified beyond the genus).

The Ward with the lowest percentage of potentially large trees is All Saints (38.2%). The following Wards are all below average for large growing trees:

- All Saints (38.2%)
- Oakley (50%)
- College (50.7%)
- Park (54.6%)

- St Mark's (56.4%)
- Hesters Way (59.9%)
- Warden Hill (63.1%)
- Lansdown (64.6%)

Most of the Wards are around the average for small trees except Hesters Way (18.8%) and All Saints (61.8%). All Saints is the clear outlier and with only 4 sites, addressing this while selecting trees suitable for those sites may be challenging.

Age potential

Age potential is important in that it is often linked to tree size (meaning greater benefits in terms of shading etc) but also that the benefits are more long-lived. Age potential was split into three categories. Trees that live less than 100 years (short), those that tend to live around 100 years (medium) and those that exceed 100 years (sometimes by many centuries). Note that ash and elm, although historically would have been long-living species, are now largely condemned to much shorter lives due to pathogenic biotic influences. Barcham's Time For Trees has a useful guide which has been used as a reference point – it offers a guide for urban (generally shorter) and rural (generally longer) lifespans.

Borough-wide, 51% of the council's trees are long-lived species. 10.5% are medium and 37.8% are short-lived species.

Oakley has the lowest percentage of long-lived species at 28.8%.

Seven Wards have less than 40% long-lived trees:

- Oakley 28.8%

- Prestbury 31.0%
- Hesters Way 38.1%
- Springbank 38.2%
- All Saints 38.2%
- Up Hatherley 38.4%
- Warden Hill 38.6%
- Battledown 39.1%

Oakley is the clear outlier in this set.

Entomophily vs. anemophily

In the face of climate change, supporting minibeasts is key to preventing ecosystem collapse and mass extinction. While it isn't the only factor in species selection for the manager of tree stocks in urban areas, it is worth due consideration. It may be tempting to think that only small, short-lived fruit trees are entomophilous. However, there are some excellent large-growing entomophilous species – lime, sweet and horse chestnut, field maple, sycamore to name a few. Amongst these, there are long-lived species and, to add weight if needed, native species as well.

Across Cheltenham, the split is roughly half and half (44.6% insect-pollinated trees to 54.9% wind-pollinated).

That trend is roughly matched Ward-by-Ward except for a few outliers.

All Saints has 91.2% insect-pollinated trees. Lansdown has a high percentage as well at 71.9%.

Meanwhile, Battledown has only 38.4% insect-pollinated trees.

Housing:

Trees per site

Housing forecourts inspection data has been used to analyse housing sites – note, this does not include individual dwellings and their gardens. **Housing sites have fewer trees per site than leisure tree sites (7.6 per site for housing compared with 31.4 for leisure sites).** However, most forecourts are modest in size so this may be in proportion (further analysis would be required to make clearer judgements).

Most Wards are below this average with Springbank (22.2 t/s), Up Hatherley (16.6), St Mark's (13.1), and St Paul's (7.7) all above average.

Those Wards with lowest t/s are:

- Warden Hill (1)
- St Peter's (3.8)
- Battledown (4.3)
- Prestbury (4.3)
- Hesters Way (4.6)
- Swindon Village (4.6)

Maturity

Across the borough, the percentage of **Stage 1 maturity trees is 29.5%** (this compares favourably with the leisure trees average of 15.4%). The Wards with the lowest percentage of **S1 maturity trees** are:

- Warden Hill (0%)
NB very small sample size
- Battledown (3.8%)
- St Peter's (11.1%)

- Prestbury (18.8%)
- Lansdown (20%)
- Pittville (20.7%)
- Swindon Village (21.7%)

Condition

0.5% of trees on housing sites are categorised as 4. This compares favourably with leisure trees (1.3%).

Only Hesters Way has a significantly higher percentage of category 4 condition trees (1.3%). Again, this may be considered statistically 'in range.'

Size potential

56.9% of housing trees have the potential to become large (compared with 68.9% for leisure trees). **The Wards with the lowest percentage of large-growing species are:**

- Prestbury (12.5%)
- All Saints (27.3%)
- Lansdown (33.3%)
- Hesters Way (38.6%)
- Charlton Kings (42.9%)
- Oakley (47.4%)
- Battledown (48%)

Age potential

Housing site trees are made up of **36.9% long-lived species** (compared with 51% for leisure trees). **The Wards with the lowest percentage of long-living species are:**

- All Saints (9.1%)
- Park (14.3%)
- Prestbury (17.6%)
- Hesters Way (20.3%)
- Charlton Kings (25%)
- Benhall, The Reddings and Fiddlers Green (28.6%)
- Oakley (29.3%)
- Up Hatherley (33.6%)

Entomophily vs. anemophily

Leisure sites have 54.9% entomophilous trees. **Housing sites have 57.8% entomophilous trees.** **The Wards with the lowest percentage of insect-pollinated species are:**

- Warden Hill (0%)
- Benhall, The Reddings and Fiddlers Green (25%)
- Park (35.7%)
- Lansdown (40%)
- Up Hatherley (45.2%)
- Swindon Village (51.7%)

Cemeteries

Maturity

The percentage of new trees in both cemeteries is low:

- Bouncers Lane (10%)
- Charlton Kings (2.6%)

Making 9.2% across both. Compare this with 15.4% across leisure sites. Across leisure sites, maturity 1 and 2 trees make up 37.2% of trees, compared with 16.8% for cemeteries.

Condition

Most cemetery trees are rated condition 2 (89.7%). **The low percentage of category 1 trees (1.4%) compared with leisure trees (30.6%) may be explained by the lack low proportion of new trees in cemeteries.**

Size potential

The percentage of large growing species in cemeteries (62.3%) is not far from those in leisure sites (68.9%). However, Charlton Kings Cemetery has a lower number (48.7%).

Age potential

Overall, the cemeteries have 44.7% long-living species (compare with 51% for leisure trees). **Charlton Kings Cemetery again lags slightly with only 23.1% of its trees considered long-living.**

Entomophily vs. anemophily

Both cemeteries (BL at 36.1% and CK at 10.3%) have a lower percentage of entomophilous species compared with leisure trees (54.9%).

Highways

Highways planting is often limited by underground services – leisure tree sites have fewer such restrictions. Planting may also be limited by available verge, pavement size, road width etc. It could be argued that street trees are more likely to interfere with the built environment than leisure trees, and this may make removal of trees more likely (with potential for replacement trees limited by the concern over recurring damage). It may be unfair to compare highways trees data to leisure trees data therefore. However, here leisure trees data is used as a baseline for a lack of comparable highways data e.g. nationally.

Data is not available for ‘Condition’ as Highways TOs don’t record data in the same way – where defects are found, these are recorded and works ordered but no overall condition score is attributed.

Trees per Ward

While leisure trees have been analysed per site within Wards, the picture is slightly different for highways – the ‘sites’ are the highways verges / pavements and an accurate picture of potential tree growing ‘sites’ is not currently available. The following data should therefore be understood in the context of some Wards being more suited to growing street trees (e.g. wider streets, larger pavements etc), and some being less suited (e.g. rural roads without verges, narrow urban streets with narrow pavements etc). A figure has been given for trees / ha within Wards (note this is total hectarage of Wards, not hectarage of Highways’ land).

Ward	Trees	ha	t/ha	Stage 1 (young) t/ha	Large growing t/ha	Long lived t/ha
All Saints	378	78	4.8	0.6	2.9	2.4
Battledown	195	696	0.5	0.0	0.2	0.1
Benhall, the Reddings and Fiddlers Green	479	275	1.4	0.1	1.2	0.8
Charlton Kings	226	486	0.8	0.1	0.2	0.2
Charlton Park	257	372	1.0	0.1	0.5	0.4
College	376	139	2.7	0.3	1.9	1.7
Hesters Way	525	128	3.0	0.3	2.2	2.1
Lansdown	609	125	3.0	0.3	4.5	4.2
Leckhampton	276	199	1.9	0.1	1.2	1.0
Oakley	133	138	2.7	0.2	0.3	0.2
Park	434	114	3.3	0.2	2.8	2.4
Pittville	693	162	2.3	0.4	2.9	1.7
Prestbury	348	409	0.9	0.0	0.6	0.5
Springbank	282	192	2.0	0.2	0.7	0.6
St. Mark's	494	132	2.9	0.2	2.2	1.9
St. Paul's	109	69	5.5	0.2	1.0	0.8
St. Peter's	473	131	2.9	0.1	2.2	2.1
Swindon Village	84	515	0.7	0.0	0.1	0.1
Up Hatherley	100	136	2.8	0.1	0.4	0.2
Warden Hill	79	161	2.3	0.0	0.2	0.1
Grand Total	6550	4657	1.4	0.1	0.9	0.8

Maturity

Across Cheltenham, **7.9% of street trees are categorised as new compared with 15.4% in leisure trees sites.**

St Peter's and Swindon Village have the lowest percentage of S1 trees (3.4% and 3.6% respectively). The Wards with percentages close to leisure tree sites are:

- **Charlton Kings** **16.8%**
- **Oakley** **15.8%**
- **St Paul's** **14.7%**
- **Springbank** **14.2%**
- **All Saints** **12.4%**
- **Battledown** **12.3%**

All other Wards have less than 10% new trees.

Size potential

Borough-wide, **large growing species account for 66% of street trees.** This is comparable with large growing leisure trees (68.9%). The wards with the lowest percentage of large-growing trees are:

- **Oakley** **30.1%**
- **Warden Hill** **42.7%**
- **Springbank** **45.8%**

All other wards have at least 50% large trees.

Age potential

54.3% of street trees are long-lived species. This compares favourably with leisure trees (51%).

The following Wards have the lowest percentage of long-lived species:

- **Oakley** **25.6%**
- **Up Hatherley** **30%**
- **Warden Hill** **30.7%**
- **Battledown** **34.7%**
- **Pittville** **38.8%**

Springbank, Benhall, the Reddings and Fiddlers Green, Charlton Kings and St Marks all registered between 40-50% long living trees.

Pollination

Street trees are represented by **75% insect-pollinated species.** This is compared to 54.9% for leisure trees. The outlier is **St Paul's with only 56.1%**, but this is still higher than the average for leisure trees.

Car parks

Car park trees data is included for the sake of completeness and for context. There is limited scope for planting within car parks as space is at such a high premium and the increased cost of planting (which can require specialist equipment to cut a planting pit in the tarmac, and heavy-duty protection for the trees) cannot easily be absorbed by the council's Trees Section.

As the sample size is small (only 79 trees spread across 11 sites in 7 wards), the data is not analysed by Ward but summarised in its entirety.

Condition

Most trees in car parks are in good condition – **39.2% are category 1 and 53.2% are category 2.**

Maturity

20.3% of trees in car parks are at stage 1 of their life. This compares favourably with 15.4% for leisure trees.

Size potential

74.7% of car parks trees are large growing species. Compare this with 68.9% for leisure trees.

Age potential

59.5% of car parks trees are long living species. For leisure trees, this is 51%.

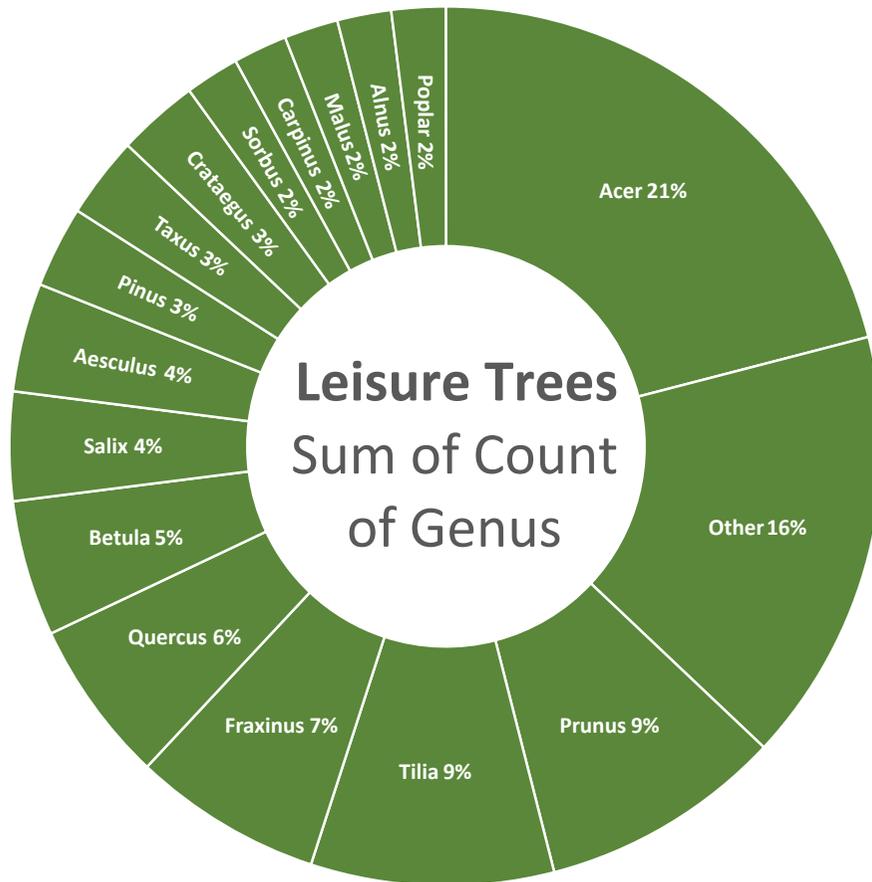
Pollination

69.6% of trees in car parks are insect-pollinated, compared to 54.9% for leisure trees.

Diversity of genus

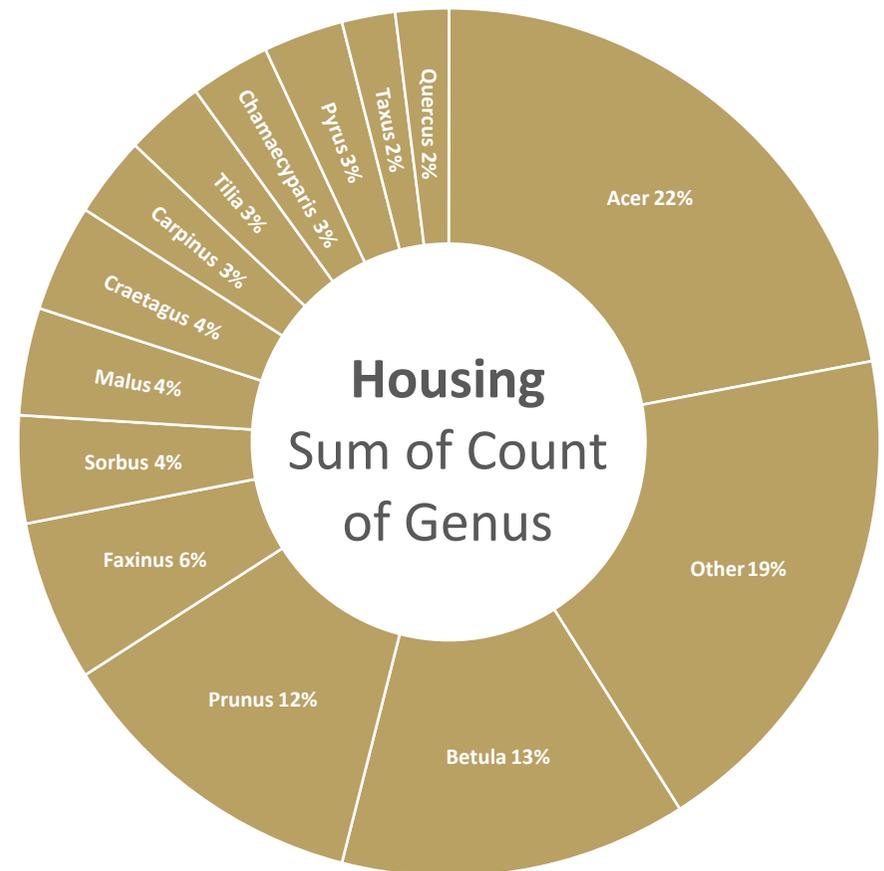
Analysis of diversity of genus has been undertaken to show data for leisure trees, highways and housing forecourt trees. Where numbers of trees was relatively low, they were grouped together as 'Other' in order for the pie charts to be legible. For leisure trees, any genus with fewer than 100 trees was grouped as 'Other', for highways trees this was any genus with fewer than 90 trees, and for Housing fewer than 20. From a statistical management point of view, this decision was based on instinct as to what would work with the pie charts. The full data tables are available at the end of this appendix.

Leisure trees



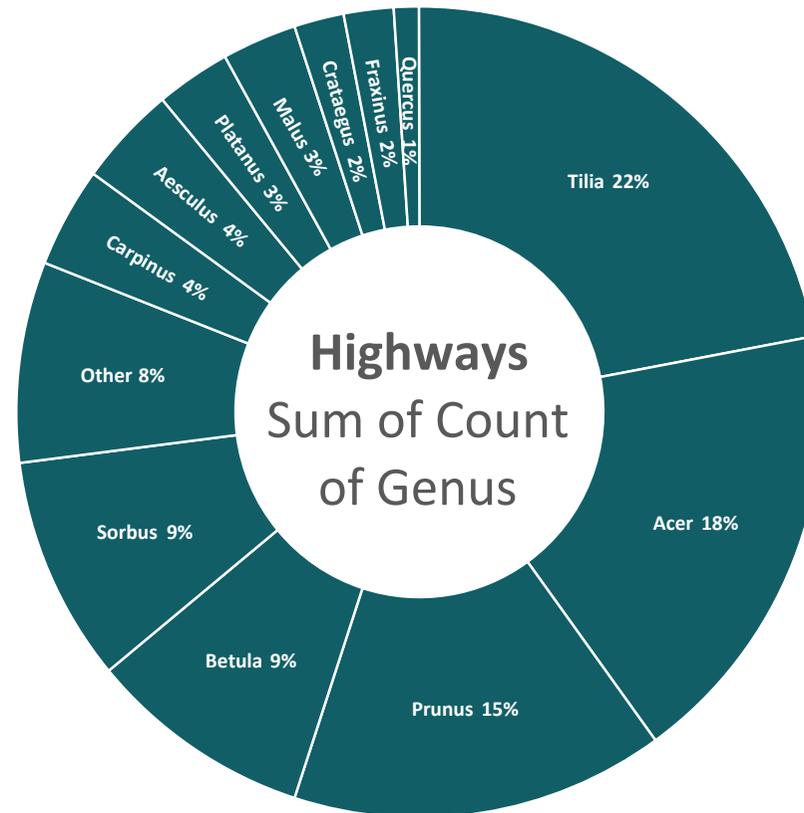
This suggests a prevalence of Acer that is likely demonstrating the success of sycamore in the Borough. Fraxinus is likely to suffer in the coming years, leaving Acer, Tilia, Prunus as the dominant genera, making up over a third of the overall trees. Although there is a healthy spread of different tree genera overall (73), there might be an over-reliance on those three genera. To ensure a resilience against pathogens, the effects of climate change etc, a better spread of the numbers might be a wise management option.

Housing



Nearly half of the total number of trees managed by Housing are made up of only three genera - this surely represents an over-reliance which could lead to a lack of resilience in the stock. Again, the next populus genus is Fraxinus, which could lead to an even more imbalanced picture. It is interesting to note that the count of genera on housing forecourts is only 46 (lower than for housing trees). This may be accounted to the relatively small spaces available at housing sites.

Highways



While there are clear limitations to the kinds of trees that are suitable to plant by the highway (i.e. the properties of the trees planted should be stable timber and unions, minimal debris drop, pollution tolerance etc), and where large trees have been planted in avenues it would be regrettable to replace any losses with small trees (and vice versa), the spread could be more evenly distributed. To have three genera representing over half the total trees signifies a worrying over-reliance on those three genera. The lower total count of genera (48) demonstrates the limitations of planting by the highway.

Appendix 3: Data tables

Trees per site

Leisure

(data ordered by t/s column)

Ward	Sites	Trees	Trees per site
All Saints	4	34	8.5
St Paul's	4	41	10.3
Springbank	9	109	12.1
Up Hatherley	18	228	12.7
Charlton Kings	7	103	14.7
Warden Hill	15	239	15.9
Prestbury	8	129	16.1
Benhall, The Reddings and Fiddler's Green	11	248	22.5
Battledown	6	138	23.0
Oakley	4	104	26.0
Leckhampton	4	114	28.5
Hesters Way	6	197	<u>32.8</u>
Charlton Park	13	484	<u>37.2</u>
St Peter's	6	224	<u>37.3</u>
St Mark's	6	227	<u>37.8</u>
College	12	477	<u>39.8</u>
Park	8	335	<u>41.9</u>
Lansdown	12	509	<u>42.4</u>
Swindon Village	10	458	<u>45.8</u>
Pittville	20	1353	<u>67.7</u>
Total	183	5751	31.4

Housing

Ward	Sites	Trees	Trees per site
All Saints	2	11	5.5
Battledown	6	26	4.3
Benhall, The Reddings and Fiddler's Green	3	21	7.0
Charlton Kings	7	36	5.1
Charlton Park	0	0	-
College	0	0	-
Hesters Way	34	158	4.6
Lansdown	3	15	5.0
Leckhampton	0	0	-
Oakley	23	140	6.1
Park	2	14	7.0
Pittville	6	29	4.8
Prestbury	4	17	4.3
Springbank	9	200	<u>22.2</u>
St Mark's	21	275	<u>13.1</u>
St Paul's	6	46	<u>7.7</u>
St Peter's	12	45	3.8
Swindon Village	13	60	4.6
Up Hatherley	7	116	<u>16.6</u>
Warden Hill	1	1	1.0
Total	159	1210	7.6

Maturity per Ward - Leisure

Ward	I	II	III	IV	V	VI
All Saints	47.1%	2.9%	35.3%	8.8%	2.9%	2.9%
Battledown	10.9%	19.6%	52.2%	8.7%	8.0%	0.7%
Benhall, The Reddings and Fiddler's Green	25.4%	14.5%	52.0%	3.6%	4.4%	0.0%
Charlton Kings	9.7%	21.4%	33.0%	22.3%	8.7%	4.9%
Charlton Park	16.1%	20.7%	39.5%	10.5%	11.0%	2.3%
College	18.9%	18.2%	29.6%	15.1%	17.2%	1.0%
Hesters Way	6.1%	12.7%	31.0%	35.0%	15.2%	0.0%
Lansdown	20.9%	24.4%	22.8%	14.4%	16.1%	1.4%
Leckhampton	18.4%	25.4%	36.8%	14.9%	2.6%	1.8%
Oakley	25.0%	26.9%	32.7%	5.8%	9.6%	0.0%
Park	11.3%	21.2%	29.9%	21.8%	14.0%	1.8%
Pittville	15.6%	16.6%	33.2%	18.3%	14.6%	1.8%
Prestbury	7.0%	43.4%	33.3%	9.3%	3.9%	3.1%
Springbank	3.7%	36.7%	44.0%	9.2%	2.8%	3.7%
St Mark's	20.3%	26.4%	20.7%	15.4%	13.7%	3.5%
St Paul's	22.0%	7.3%	61.0%	4.9%	4.9%	0.0%
St Peter's	4.9%	39.3%	34.4%	16.5%	3.6%	1.3%
Swindon Village	11.6%	12.2%	45.6%	15.3%	12.2%	3.1%
Up Hatherley	11.8%	35.5%	35.5%	10.5%	5.7%	0.9%
Warden Hill	16.7%	40.2%	28.0%	8.4%	6.3%	0.4%
Grand total	15.4%	21.8%	34.4%	15.1%	11.6%	1.7%

Ward	I	II	III	IV	V	VI	Grand Total
All Saints	16	1	12	3	1	1	34
Battledown	15	27	72	12	11	1	138
Benhall, The Reddings and Fiddler's Green	63	36	129	9	11		248
Charlton Kings	10	22	34	23	9	5	103
Charlton Park	78	100	191	51	53	11	484
College	90	87	141	72	82	5	477
Hesters Way	12	25	61	69	30		197
Lansdown	106	124	116	73	82	7	508
Leckhampton	21	29	42	17	3	2	114
Oakley	26	28	34	6	10		104
Park	38	71	100	73	47	6	335
Pittville	211	224	449	248	197	24	1353
Prestbury	9	56	43	12	5	4	129
Springbank	4	40	48	10	3	4	109
St Mark's	46	60	47	35	31	8	227
St Paul's	9	3	25	2	2		41
St Peter's	11	88	77	37	8	3	224
Swindon Village	53	56	209	70	56	14	458
Up Hatherley	27	81	81	24	13	2	228
Warden Hill	40	96	67	20	15	1	239
Grand total	885	1254	1978	866	669	98	5750

Maturity per Ward - Housing

Ward	I	II	III	IV	V	VI
All Saints	9.1%	9.1%	54.5%	0.0%	27.3%	0.0%
Battledown	3.8%	11.5%	46.2%	19.2%	19.2%	0.0%
Benhall, The Reddings and Fiddler's Green	23.8%	4.8%	71.4%	0.0%	0.0%	0.0%
Charlton Kings	8.3%	41.7%	36.1%	8.3%	5.6%	0.0%
Hesters Way	18.4%	36.7%	27.8%	10.1%	7.0%	0.0%
Lansdown	13.3%	0.0%	26.7%	40.0%	20.0%	0.0%
Oakley	26.6%	10.8%	34.5%	17.3%	10.8%	0.0%
Park	50.0%	7.1%	14.3%	7.1%	21.4%	0.0%
Pittville	13.8%	27.6%	27.6%	10.3%	20.7%	0.0%
Prestbury	6.7%	40.0%	33.3%	13.3%	6.7%	0.0%
Springbank	9.0%	25.0%	56.5%	8.0%	1.0%	0.5%
St Mark's	5.5%	26.2%	39.6%	16.0%	11.6%	1.1%
St Paul's	4.3%	56.5%	17.4%	19.6%	2.2%	0.0%
St Peter's	11.4%	34.1%	22.7%	27.3%	4.5%	0.0%
Swindon Village	10.0%	21.7%	36.7%	15.0%	16.7%	0.0%
Up Hatherley	10.3%	26.7%	32.8%	13.8%	15.5%	0.9%
Warden Hill	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%
Grand Total	12.3%	26.1%	37.9%	13.8%	9.5%	0.4%

Wards	I	II	III	IV	V	VI
All Saints	1	1	6		3	
Battledown	1	3	12	5	5	
Benhall, The Reddings and Fiddler's Green	5	1	15			
Charlton Kings	3	15	13	3	2	
Hesters Way	29	58	44	16	11	
Lansdown	2		4	6	3	
Oakley	37	15	48	24	15	
Park	7	1	2	1	3	
Pittville	4	8	8	3	6	
Prestbury	1	6	5	2	1	
Springbank	18	50	113	16	2	1
St Mark's	15	72	109	44	32	3
St Paul's	2	26	8	9	1	
St Peter's	5	15	10	12	2	
Swindon Village	6	13	22	9	10	
Up Hatherley	12	31	38	16	18	1
Warden Hill					1	
Grand Total	148	315	457	166	115	5

Maturity per Ward - Cemeteries

	I	II	III	IV	V	VI	Grand Total
BOUNCERS LANE CEMETERY	33	16	136	14	116	16	331
C/KINGS CEMETERY	1	12	18	7			38
Grand Total	34	28	154	21	116	16	369

	I	II	III	IV	V	VI
BOUNCERS LANE CEMETERY	10.0%	4.8%	41.1%	4.2%	35.0%	4.8%
C/KINGS CEMETERY	2.6%	31.6%	47.4%	18.4%	0.0%	0.0%
Grand Total	9.2%	7.6%	41.7%	5.7%	31.4%	4.3%

Condition per Ward - Leisure

Wards	1	2	3	4
All Saints	58.8%	41.2%	0.0%	0.0%
Battledown	26.1%	68.1%	5.1%	0.7%
Benhall, The Reddings and Fiddler's Green	32.0%	58.0%	9.6%	0.4%
Charlton Kings	21.9%	70.5%	5.7%	1.9%
Charlton Park	31.4%	58.7%	7.6%	2.3%
College	37.6%	57.1%	4.4%	0.8%
Hesters Way	15.2%	75.1%	9.6%	0.0%
Lansdown	38.1%	57.2%	4.1%	0.6%
Leckhampton	35.7%	54.8%	7.8%	1.7%
Oakley	39.4%	55.8%	3.8%	1.0%
Park	24.6%	69.4%	5.0%	0.9%
Pittville	33.3%	59.4%	6.1%	1.2%
Prestbury	33.3%	58.9%	6.2%	1.6%
Springbank	23.6%	65.5%	8.2%	2.7%
St Mark's	32.6%	54.2%	9.3%	4.0%
St Paul's	19.5%	73.2%	7.3%	0.0%
St Peter's	14.2%	80.9%	3.6%	1.3%
Swindon Village	24.0%	64.9%	8.5%	2.6%
Up Hatherley	18.9%	76.3%	3.9%	0.9%
Warden Hill	40.2%	56.0%	3.3%	0.4%
Grand Total	30.6%	62.0%	6.1%	1.3%

Wards	0	1	2	3	4
All Saints		20	14		
Battledown		36	94	7	1
Benhall, The Reddings and Fiddler's Green	2	80	145	24	1
Charlton Kings	1	23	74	6	2
Charlton Park	1	152	284	37	11
College	1	179	272	21	4
Hesters Way		30	148	19	
Lansdown		194	291	21	3
Leckhampton		41	63	9	2
Oakley		41	58	4	1
Park		83	234	17	3
Pittville		450	804	83	16
Prestbury		43	76	8	2
Springbank		26	72	9	3
St Mark's		74	123	21	9
St Paul's		8	30	3	
St Peter's		32	182	8	3
Swindon Village		110	298	39	12
Up Hatherley	1	43	174	9	2
Warden Hill		97	135	8	1
Grand Total	6	1762	3571	353	76

Condition per Ward - Housing

Wards	0	1	2	3	4
All Saints	0.0%	45.5%	45.5%	9.1%	0.0%
Battledown	0.0%	3.8%	84.6%	11.5%	0.0%
Benhall, The Reddings and Fiddler's Green	0.0%	38.1%	61.9%	0.0%	0.0%
Charlton Kings	0.0%	27.8%	72.2%	0.0%	0.0%
Hesters Way	0.0%	36.7%	58.9%	3.2%	1.3%
Lansdown	0.0%	20.0%	66.7%	13.3%	0.0%
Oakley	0.7%	34.3%	63.6%	0.7%	0.7%
Park	0.0%	50.0%	50.0%	0.0%	0.0%
Pittville	0.0%	20.7%	75.9%	3.4%	0.0%
Prestbury	6.3%	18.8%	75.0%	0.0%	0.0%
Springbank	0.0%	27.5%	66.5%	5.5%	0.5%
St Mark's	0.0%	25.5%	70.5%	3.3%	0.7%
St Paul's	0.0%	56.5%	43.5%	0.0%	0.0%
St Peter's	0.0%	11.1%	84.4%	4.4%	0.0%
Swindon Village	0.0%	21.7%	68.3%	10.0%	0.0%
Up Hatherley	0.0%	33.6%	56.9%	9.5%	0.0%
Warden Hill	0.0%	0.0%	0.0%	100.0%	0.0%
Grand Total	0.2%	29.5%	65.4%	4.4%	0.5%

Wards	0	1	2	3	4
All Saints		5	5	1	
Battledown		1	22	3	
Benhall, The Reddings and Fiddler's Green		8	13		
Charlton Kings		10	26		
Hesters Way		58	93	5	2
Lansdown		3	10	2	
Oakley	1	48	89	1	1
Park		7	7		
Pittville		6	22	1	
Prestbury	1	3	12		
Springbank		55	133	11	1
St Mark's		70	194	9	2
St Paul's		26	20		
St Peter's		5	38	2	
Swindon Village		13	41	6	
Up Hatherley		39	66	11	
Warden Hill				1	
Grand Total	2	357	791	53	6

Condition per Ward - Cemeteries

	1	2	3	4	Grand Total
BOUNCERS LANE CEMETERY		298	19	14	331
C/KINGS CEMETERY	5	34			39
Grand Total	5	332	19	14	370

	1	2	3	4	5
BOUNCERS LANE CEMETERY	0.0%	90.0%	5.7%	4.2%	4.8%
C/KINGS CEMETERY	12.8%	87.2%	0.0%	0.0%	0.0%
Grand Total	9.2%	7.6%	41.7%	5.7%	4.3%

Size potential per Ward - Leisure

Wards	Large	Medium	Small
All Saints	38.2%	0.0%	61.8%
Battledown	76.9%	9.0%	14.2%
Benhall, The Reddings and Fiddler's Green	77.0%	19.7%	3.3%
Charlton Kings	72.4%	16.2%	11.4%
Charlton Park	76.3%	16.0%	7.7%
College	51.6%	35.2%	13.2%
Hesters Way	61.8%	18.8%	19.4%
Lansdown	65.5%	21.3%	13.1%
Leckhampton	69.4%	19.4%	11.1%
Oakley	50.5%	35.0%	14.6%
Park	56.4%	25.8%	17.8%
Pittville	75.7%	17.9%	6.4%
Prestbury	70.4%	17.6%	12.0%
Springbank	69.4%	14.8%	15.7%
St Mark's	59.3%	22.2%	18.5%
St Paul's	80.5%	17.1%	2.4%
St Peter's	76.6%	14.9%	8.6%
Swindon Village	73.0%	16.0%	11.0%
Up Hatherley	72.8%	14.3%	12.9%
Warden Hill	65.2%	21.0%	13.7%
Grand Total	68.9%	19.8%	11.2%

Wards	Large	Medium	Small	N/A	Grand Total
All Saints	13		21		34
Battledown	103	12	19	4	138
Benhall, The Reddings and Fiddler's Green	188	48	8	8	252
Charlton Kings	76	17	12	1	106
Charlton Park	366	77	37	5	485
College	242	165	62	8	477
Hesters Way	118	36	37	6	197
Lansdown	329	107	66	7	509
Leckhampton	75	21	12	7	115
Oakley	52	36	15	1	104
Park	184	84	58	11	337
Pittville	1010	239	85	19	1353
Prestbury	88	22	15	4	129
Springbank	75	16	17	2	110
St Mark's	128	48	40	11	227
St Paul's	33	7	1		41
St Peter's	170	33	19	3	225
Swindon Village	332	73	50	4	459
Up Hatherley	163	32	29	5	229
Warden Hill	152	49	32	8	241
Grand Total	3897	1122	635	114	5768

Size potential per Ward - Housing

Wards	Large	Medium	Small	N/A	Grand Total
All Saints	3	4	4		11
Battledown	12	11	2	1	26
Benhall, The Reddings and Fiddler's Green	18	1	1	1	21
Charlton Kings	15	10	10	1	36
Hesters Way	56	52	37	13	158
Lansdown	5	8	2		15
Oakley	63	40	30	7	140
Park	11	3			14
Pittville	16	6	7		29
Prestbury	2	11	3	1	17
Springbank	147	40	10	3	200
St Mark's	145	65	54	11	275
St Paul's	24	17	5		46
St Peter's	31	10	4		45
Swindon Village	42	9	9		60
Up Hatherley	74	24	14	4	116
Warden Hill	1				1
Grand Total	665	311	192	42	1210

Wards	Large	Medium	Small
All Saints	27.3%	36.4%	36.4%
Battledown	48.0%	44.0%	8.0%
Benhall, The Reddings and Fiddler's Green	90.0%	5.0%	5.0%
Charlton Kings	42.9%	28.6%	28.6%
Hesters Way	38.6%	35.9%	25.5%
Lansdown	33.3%	53.3%	13.3%
Oakley	47.4%	30.1%	22.6%
Park	78.6%	21.4%	0.0%
Pittville	55.2%	20.7%	24.1%
Prestbury	12.5%	68.8%	18.8%
Springbank	74.6%	20.3%	5.1%
St Mark's	54.9%	24.6%	20.5%
St Paul's	52.2%	37.0%	10.9%
St Peter's	68.9%	22.2%	8.9%
Swindon Village	70.0%	15.0%	15.0%
Up Hatherley	66.1%	21.4%	12.5%
Warden Hill	100.0%	0.0%	0.0%
Grand Total	56.9%	26.6%	16.4%

Condition per Ward - Cemeteries

	Large	Medium	Small	N/A	Grand Total
BOUNCERS LANE CEMETERY	211	82	36	1	330
C/KINGS CEMETERY	19	19	1		39
Grand Total	230	101	37	1	369

	Large	Medium	Small	N/A
BOUNCERS LANE CEMETERY	63.9%	24.8%	10.9%	0.3%
C/KINGS CEMETERY	48.7%	48.7%	2.6%	0.0%
Grand Total	62.3%	27.4%	10.0%	0.3%

Age potential per Ward - Leisure

Wards	Long	Medium	Short
All Saints	38.2%	0.0%	61.8%
Battledown	39.1%	24.6%	36.2%
Benhall, The Reddings and Fiddler's Green	48.4%	10.3%	39.7%
Charlton Kings	44.3%	17.0%	37.7%
Charlton Park	47.6%	15.1%	36.7%
College	49.7%	13.4%	36.1%
Hesters Way	38.1%	8.6%	51.8%
Lansdown	60.1%	4.9%	34.6%
Leckhampton	44.3%	13.9%	40.0%
Oakley	28.8%	15.4%	54.8%
Park	42.1%	5.9%	50.7%
Pittville	64.4%	8.3%	26.8%
Prestbury	31.0%	17.8%	51.2%
Springbank	38.2%	11.8%	50.0%
St Mark's	46.7%	12.8%	40.5%
St Paul's	73.2%	12.2%	14.6%
St Peter's	50.7%	7.6%	41.3%
Swindon Village	54.0%	6.8%	38.8%
Up Hatherley	38.4%	17.5%	41.0%
Warden Hill	38.6%	10.4%	49.4%
Grand Total	51.0%	10.5%	37.8%

Wards	Long	Medium	Short	N/A	Grand Total
All Saints	13		21		34
Battledown	54	34	50		138
Benhall, The Reddings and Fiddler's Green	122	26	100	4	252
Charlton Kings	47	18	40	1	106
Charlton Park	231	73	178	3	485
College	237	64	172	4	477
Hesters Way	75	17	102	3	197
Lansdown	306	25	176	2	509
Leckhampton	51	16	46	2	115
Oakley	30	16	57	1	104
Park	142	20	171	4	337
Pittville	872	112	363	6	1353
Prestbury	40	23	66		129
Springbank	42	13	55		110
St Mark's	106	29	92		227
St Paul's	30	5	6		41
St Peter's	114	17	93	1	225
Swindon Village	248	31	178	2	459
Up Hatherley	88	40	94	7	229
Warden Hill	93	25	119	4	241
Grand Total	2941	604	2179	44	5768

Age potential per Ward - Housing

Wards	Long	Medium	Short	N/A
All Saints	9.1%	0.0%	90.9%	0.0%
Battledown	50.0%	26.9%	23.1%	0.0%
Benhall, The Reddings and Fiddler's Green	28.6%	28.6%	38.1%	4.8%
Charlton Kings	25.0%	13.9%	61.1%	0.0%
Hesters Way	20.3%	3.8%	75.9%	0.0%
Lansdown	60.0%	13.3%	13.3%	13.3%
Oakley	29.3%	8.6%	62.1%	0.0%
Park	14.3%	0.0%	85.7%	0.0%
Pittville	51.7%	3.4%	44.8%	0.0%
Prestbury	17.6%	11.8%	64.7%	5.9%
Springbank	58.5%	11.5%	29.5%	0.5%
St Mark's	36.7%	15.6%	45.1%	2.5%
St Paul's	34.8%	2.2%	63.0%	0.0%
St Peter's	42.2%	22.2%	31.1%	4.4%
Swindon Village	38.3%	5.0%	56.7%	0.0%
Up Hatherley	33.6%	8.6%	56.0%	1.7%
Warden Hill	100.0%	0.0%	0.0%	0.0%
Grand Total	36.9%	10.8%	50.9%	1.3%

Wards	Long	Medium	Short	N/A	Grand Total
All Saints	3	4	4		11
Battledown	12	11	2	1	26
Benhall, The Reddings and Fiddler's Green	18	1	1	1	21
Charlton Kings	15	10	10	1	36
Hesters Way	56	52	37	13	158
Lansdown	5	8	2		15
Oakley	63	40	30	7	140
Park	11	3			14
Pittville	16	6	7		29
Prestbury	2	11	3	1	17
Springbank	147	40	10	3	200
St Mark's	145	65	54	11	275
St Paul's	24	17	5		46
St Peter's	31	10	4		45
Swindon Village	42	9	9		60
Up Hatherley	74	24	14	4	116
Warden Hill	1				1
Grand Total	665	311	192	42	1210

Age per Ward - Cemeteries

	Long	Medium	Short	N/A	Grand Total
BOUNCERS LANE CEMETERY	156	46	127	1	330
C/KINGS CEMETERY	9	3	27		39
Grand Total	165	49	154	1	369

	Long	Medium	Short	N/A
BOUNCERS LANE CEMETERY	47.3%	13.9%	38.5%	0.3%
C/KINGS CEMETERY	23.1%	7.7%	69.2%	0.0%
Grand Total	44.7%	13.3%	41.7%	0.3%

Pollination by Ward - Leisure

Wards	Anemophily	Entomophily
All Saints	8.8%	91.2%
Battledown	61.6%	38.4%
Benhall, The Reddings and Fiddler's Green	44.4%	54.0%
Charlton Kings	47.2%	51.9%
Charlton Park	51.1%	48.5%
College	39.0%	60.2%
Hesters Way	49.7%	49.2%
Lansdown	28.1%	71.9%
Leckhampton	35.7%	62.6%
Oakley	37.5%	61.5%
Park	58.8%	40.1%
Pittville	49.1%	50.7%
Prestbury	51.2%	48.8%
Springbank	53.6%	46.4%
St Mark's	38.8%	61.2%
St Paul's	39.0%	61.0%
St Peter's	39.6%	60.0%
Swindon Village	38.8%	60.8%
Up Hatherley	51.1%	47.6%
Warden Hill	38.2%	60.6%
Grand Total	44.6%	54.9%

Wards	Anemophily	Entomophily	N/A	Grand Total
All Saints	3	31		34
Battledown	85	53		138
Benhall, The Reddings and Fiddler's Green	112	136	4	252
Charlton Kings	50	55	1	106
Charlton Park	248	235	2	485
College	186	287	4	477
Hesters Way	98	97	2	197
Lansdown	143	366		509
Leckhampton	41	72	2	115
Oakley	39	64	1	104
Park	198	135	4	337
Pittville	664	686	3	1353
Prestbury	66	63		129
Springbank	59	51		110
St Mark's	88	139		227
St Paul's	16	25		41
St Peter's	89	135	1	225
Swindon Village	178	279	2	459
Up Hatherley	117	109	3	229
Warden Hill	92	146	3	241
Grand Total	2572	3164	32	5768

Age potential per Ward - Housing

Wards	Anemophily	Entomophily
All Saints	27.3%	72.7%
Battledown	38.5%	61.5%
Benhall, The Reddings and Fiddler's Green	75.0%	25.0%
Charlton Kings	41.7%	58.3%
Hesters Way	38.0%	62.0%
Lansdown	60.0%	40.0%
Oakley	39.3%	60.7%
Park	64.3%	35.7%
Pittville	31.0%	69.0%
Prestbury	31.3%	68.8%
Springbank	34.2%	65.8%
St Mark's	47.1%	52.9%
St Paul's	41.3%	58.7%
St Peter's	22.2%	77.8%
Swindon Village	48.3%	51.7%
Up Hatherley	54.8%	45.2%
Warden Hill	100.0%	0.0%
Grand Total	42.2%	57.8%

Wards	Anemophily	Entomophily	N/A	Grand Total
All Saints	3	8		11
Battledown	10	16		26
Benhall, The Reddings and Fiddler's Green	15	5	1	21
Charlton Kings	15	21		36
Hesters Way	60	98		158
Lansdown	9	6		15
Oakley	55	85		140
Park	9	5		14
Pittville	9	20		29
Prestbury	5	11	1	17
Springbank	68	131	1	200
St Mark's	129	145	1	275
St Paul's	19	27		46
St Peter's	10	35		45
Swindon Village	29	31		60
Up Hatherley	63	52	1	116
Warden Hill	1			1
Grand Total	509	696	5	1210

Age per Ward - Cemeteries

	Anemophily	Entomophily	Grand Total
BOUNCERS LANE CEMETERY	211	119	330
C/KINGS CEMETERY	35	4	39
Grand Total	246	123	369

	Anemophily	Entomophily
BOUNCERS LANE CEMETERY	63.9%	36.1%
C/KINGS CEMETERY	89.7%	10.3%
Grand Total	66.7%	33.3%

Appendix 3: Data tables

Highways - Maturity by ward

Wards	1	2	3	4	5	6	Not applicable	Not specified	Grand Total
All Saints Ward	47	70	56	84	114			7	378
Battledown Ward	24	51	34	31	53			2	195
Benhall and the Reddings	36	109	250		82			2	479
Charlton Kings Ward	38	17	44	71	54			2	226
Charlton Park Ward	21	42	64	52	72	1		5	257
College Ward	36	55	88	74	123				376
Hesters Way Ward	35	149	237	6	97			1	525
Lansdown Ward	37	58	185	153	172			4	609
Leckhampton Ward	12	48	83	1	130	1		1	276
Oakley Ward	21	21	50	16	23			2	133
Park Ward	25	106	182	1	110		1	9	434
Pittville Ward	59	182	178	83	176			15	693
Prestbury Ward	19	66	154	41	67			1	348
Springbank Ward	40	61	112	18	48			3	282
St. Mark's Ward	23	133	192	1	138			7	494
St. Paul's Ward	16	40	22	10	16			5	109
St. Peter's Ward	16	123	219	61	52			2	473
Swindon Village Ward	3	11	38	19	8			5	84
Up Hatherley Ward	7	23	60		10				100
Warden Hill Ward	4	20	34	1	19			1	79
Grand Total	519	1385	2282	723	1564	2	1	74	6550

Highways - Size potential by ward

Wards	Large	Medium	Small	N/A	Grand Total
All Saints Ward	227	55	40	53	375
Battledown Ward	108	21	38	23	190
Benhall and the Reddings	318	65	56	31	470
Charlton Kings Ward	114	32	31	42	219
Charlton Park Ward	177	41	21	16	255
College Ward	264	18	44	30	356
Hesters Way Ward	287	129	91	17	524
Lansdown Ward	558	29	3	19	609
Leckhampton Ward	244	14	4	9	271
Oakley Ward	40	44	25	24	133
Park Ward	315	69	34	15	433
Pittville Ward	464	60	79	88	691
Prestbury Ward	246	42	38	20	346
Springbank Ward	127	80	51	19	277
St. Mark's Ward	285	124	70	14	493
St. Paul's Ward	66	10	18	13	107
St. Peter's Ward	285	87	74	13	459
Swindon Village Ward	58	16	7	3	84
Up Hatherley Ward	55	32	6	7	100
Warden Hill Ward	32	28	4	11	75
Grand Total	4270	996	734	467	6467

Appendix 3: Data tables

Highways - Age potential by ward

Wards	Long	Medium	Short	N/A	Grand Total
All Saints Ward	188	6	162	19	375
Battledown Ward	66	23	98	3	190
Benhall and the Reddings	213	47	197	13	470
Charlton Kings Ward	99	8	106	6	219
Charlton Park Ward	133	12	108	2	255
College Ward	243	1	112		356
Hesters Way Ward	264	12	247	1	524
Lansdown Ward	528	4	64	13	609
Leckhampton Ward	204		63	4	271
Oakley Ward	34	1	98		133
Park Ward	275	10	142	6	433
Pittville Ward	268	16	399	8	691
Prestbury Ward	208	7	124	7	346
Springbank Ward	116	7	150	4	277
St. Mark's Ward	246	10	235	2	493
St. Paul's Ward	54	2	51		107
St. Peter's Ward	272	2	183	2	459
Swindon Village Ward	48	2	34		84
Up Hatherley Ward	30	12	55	3	100
Warden Hill Ward	23	3	48	1	75
Grand Total	3512	185	2676	94	6467

Pollination strategy

Wards	Anemophily	Entomophily	N/A	Grand Total
All Saints Ward	67	308		375
Battledown Ward	63	125	2	190
Benhall and the Reddings	167	296	7	470
Charlton Kings Ward	45	169	5	219
Charlton Park Ward	102	153		255
College Ward	72	284		356
Hesters Way Ward	74	449	1	524
Lansdown Ward	162	447		609
Leckhampton Ward	81	189	1	271
Oakley Ward	11	122		133
Park Ward	119	313	1	433
Pittville Ward	264	426	1	691
Prestbury Ward	98	245	3	346
Springbank Ward	45	231	1	277
St. Mark's Ward	88	403	2	493
St. Paul's Ward	47	60		107
St. Peter's Ward	26	433		459
Swindon Village Ward	13	71		84
Up Hatherley Ward	35	62	3	100
Warden Hill Ward	19	55	1	75
Grand Total	1598	4841	28	6467

Car Parks - Condition by ward

Wards	1	2	3	Grand Total
All Saints		6		6
Charlton Kings	2	1		3
College	4	8	1	13
Lansdown	6	3	1	10
Park	4		1	5
Pittville	11	19	2	32
St Paul's	4	5	1	10
Grand Total	31	42	6	79

Wards	1	2	3
All Saints	0.0%	100.0%	0.0%
Charlton Kings	66.7%	33.3%	0.0%
College	30.8%	61.5%	7.7%
Lansdown	60.0%	30.0%	10.0%
Park	80.0%	0.0%	20.0%
Pittville	34.4%	59.4%	6.3%
St Paul's	40.0%	50.0%	10.0%
Grand Total	39.2%	53.2%	7.6%

Car Parks - Maturity by ward

Wards	I	II	III	IV	V	Grand Total
All Saints			6			6
Charlton Kings		3				3
College	2	5	2		4	13
Lansdown	5	2		2	1	10
Park	3	2				5
Pittville	1	8	21		2	32
St Paul's	5	3	2			10
Grand Total	16	23	31	2	7	79

Wards	I	II	III	IV	V
All Saints	0.0%	##	##	#	#
Charlton Kings	0.0%	##	##	#	#
College	15.4%	##	##	#	#
Lansdown	50.0%	##	##	#	#
Park	60.0%	##	##	#	#
Pittville	3.1%	##	##	#	#
St Paul's	50.0%	##	##	#	#
Grand Total	20.3%	##	##	#	#

Car Parks - Size potential by ward

Wards	Large	Long	Medium	N/A	Small	Grand Total
All Saints	6					6
Charlton Kings	2		1			3
College	7		2		4	13
Lansdown	6		3		1	10
Park	2		3			5
Pittville	25	1	5	1		32
St Paul's	10					10
Grand Total	58	1	14	1	5	79

Wards	Large	Long	Medium	N/A	Small
All Saints	100.0%	0.0%	0.0%	0.0%	0.0%
Charlton Kings	66.7%	0.0%	33.3%	0.0%	0.0%
College	53.8%	0.0%	15.4%	30.8%	0.0%
Lansdown	60.0%	0.0%	30.0%	10.0%	0.0%
Park	40.0%	0.0%	60.0%	0.0%	0.0%
Pittville	78.1%	3.1%	15.6%	0.0%	3.1%
St Paul's	100.0%	0.0%	0.0%	0.0%	0.0%
Grand Total	73.4%	1.3%	17.7%	6.3%	1.3%

Car Parks - Age potential by ward

Wards	Large	Long	Medium	N/A	Small	Grand Total
All Saints		6				6
Charlton Kings				3		3
College		5		8		13
Lansdown		6		4		10
Park				5		5
Pittville	1	19	7	4	1	32
St Paul's		10				10
Grand Total	1	46	7	24	1	79

Wards	Large	Long	Medium	N/A	Small
All Saints	0.0%	100.0%	0.0%	0.0%	0.0%
Charlton Kings	0.0%	0.0%	0.0%	100.0%	0.0%
College	0.0%	38.5%	0.0%	61.5%	0.0%
Lansdown	0.0%	60.0%	0.0%	40.0%	0.0%
Park	0.0%	0.0%	0.0%	100.0%	0.0%
Pittville	3.1%	59.4%	21.9%	12.5%	3.1%
St Paul's	0.0%	100.0%	0.0%	0.0%	0.0%
Grand Total	1.3%	58.2%	8.9%	30.4%	1.3%

Car Parks - Pollination strategy by ward

Wards	Anemophilous	Entomophilous	N/A	Grand Total
All Saints		6		6
Charlton Kings	2	1		3
College	8	5		13
Lansdown	1	9		10
Park	2	3		5
Pittville		31	1	32
St Paul's	10			10
Grand Total	23	55	1	79

Wards	Anemophilous	Entomophilous	N/A
All Saints	0.0%	100.0%	0.0%
Charlton Kings	66.7%	33.3%	0.0%
College	61.5%	38.5%	0.0%
Lansdown	10.0%	90.0%	0.0%
Park	40.0%	60.0%	0.0%
Pittville	0.0%	96.9%	3.1%
St Paul's	100.0%	0.0%	0.0%
Grand Total	29.1%	69.6%	1.3%

Diversity of genus - leisure trees

Genus	Count of Genus
Abies	1
Acer	1208
Aesculus	206
Ailanthus	21
Albus	1
Alnus	109
Amelanchier	3
Araucaria	3
Arbutus	3
Betula	298
Buxus	9
Calocedrus	4
Carpinus	126
Castanea	18
Catalpa	9
Cedar	32
Cerciliphidum	1
Cercis	9
Chamaecyparis	80
Corylus	53
Cotoneaster	8
Crataegus	159
Cupressocyparis	1
Cupressus	32
Cydonia	1
Davidia	1

Genus	Count of Genus
Eucalyptus	1
Fagus	76
Fraxinus	387
Ginkgo	17
Gleditsia	17
Groups	6
Ilex	64
Juglans	16
Juniperus	12
Koelreuteria	8
Laburnum	17
Laryx	20
Liquidambar	26
Liriodendrum	18
Magnolia	3
Malus	126
Metasequoia	12
Mixed	20
Morus	2
Nothofagus	2
Ostrya	2
Parrotia	8
Paulownia	5
Picea	11
Pinus	198
Platanus	76

Genus	Count of Genus
Poplar	103
Prunus	521
Pseudotsuga	1
Pterocarya	5
Pyrus	60
Quercus	327
Rhus	1
Robinia	50
Salix	220
Sambucus	19
Sequoia	14
Sophora	1
Sorbus	142
Taxodium	1
Taxus	173
Thuja	37
Tilia	511
Ulmus	25
Unknown	3
Zelkova	5

Diversity of genus - Highway trees

Genus	Count of Genus
Acer	1155
Aesculus	266
Ailanthus	29
Alnus	38
Betula	567
Carpinus	278
Castanea	8
Catalpa	3
Cedrus	7
Chamaecyparis	13
Corylus	86
Crataegus	141
Cupressus	2
Davidia	1
Fagus	45
Fraxinus	101
Ginkgo	13
Gleditsia	12
Ilex	4
Juglans	5
Laburnum	3
Larix	2
Liquidambar	15
Liriodendron	26
Magnolia	1
Malus	213

Genus	Count of Genus
Metasequoia	3
Ostrya	5
Other	20
Parrotia	2
Picea	3
Pinus	38
Platanus	225
Populus	2
Prunus	958
Pyrus	52
Quercus	91
Robinia	43
Salix	12
Sequoia	3
Sequoiadendron	1
Sorbus	561
Syringa	1
Taxus	19
Tilia	1462
Ulmus	2
Unknown	13

Diversity of genus - Housing

Genus	Count of Genus
Acer	263
Aesculus	15
Ailanthus	4
Alnus	12
Betula	161
Carpinus	43
Castanea	10
Cedar	3
Cercis	1
Chamaecyparis	36
Corylus	2
Cotoneaster	6
Crataegus	44
Cupressus	11
Eucalyptus	1
Euonymus	1
Fagus	14
Fraxinus	70
Gleditsia	15
Ilex	19
Juglans	1
Juniperus	1
Koelreuteria	2
Laburnum	3
Liquidambar	6
Liriodendron	1

Genus	Count of Genus
Magnolia	1
Malus	48
Mixed	2
Morus	1
Picea	3
Pinus	13
Platanus	10
Poplar	12
Prunus	145
Pyrus	32
Quercus	24
Robinia	19
Salix	17
Sambucus	7
Sequoia	2
Sorbus	49
Syringa	1
Taxus	27
Thuja	13
Tilia	36



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Tree Strategy



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.

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

Environmental	Scores	Justification	Recommendation
GHGs	8	This strategy sets out a clear framework for managing, protecting, and enhancing the town's tree stock, this in turn supports carbon sequestration, soil carbon enhancement, and prevents land degradation within the borough.	0
Air quality	8	Trees absorb harmful air pollutants, reduce particulate matter and improve air flow in towns.	0
Sustainable Transport	0	NA	0
Land use change	8	The tree management principles support how land is managed, restored, protected, and transformed. Trees shape landscapes in ways that promote sustainable land use.	0
Biodiversity	8	Having an overarching strategy which outlines the vision and principles within the tree strategy this ensures habitat, food, shelter, nesting is available to support biodiversity.	0

Soil and waterway health	8	Ensuring decision making across the council aligns with the strategy enhancing, protecting, and management of trees supports water quality and soil health.	0
Climate Change Adaptation	8	This strategy future proofs decision making for climate change adaptation. Trees help mitigate against the impacts of climate change such as cooling in heat waves and rising temperatures, reduce flooding and stabilise soil erosion.	0
Energy Use	0	NA	0
Sustainable Materials	0	NA	0
Waste	0	NA	0

Social	Scores	Justification	Recommendation
Food	0	Whilst there is a direct link between food and trees, this strategy does not aim to address this.	0
Health	4	Trees lead to better human health key impacts include improved air quality, higher levels of physical exercise, a reduction in serious health conditions and higher levels of reported happiness and mental wellbeing.	0
Housing	0	NA	0
Education	4	The aim of the strategy is to promote education and awareness, to help engage local communities with the broader understanding and a sense of ownership of their environment.	0
Community	4	The strategy aims to secure tree retention and planting planning process, recognising their value in preserving Cheltenham's historic character and enhancing its environmental legacy, therefore improving the physical space.	0
Culture	0	0	0
Accessibility	0	0	0
Local Economy and Jobs	2	Trees play a crucial role in enhancing the quality of urban living and contributing to the economic well-being of communities and support livelihoods through job creation.	0
Safety	0	NA	0
Equity	0	NA	0

Democratic Voice	4	To help inform this strategy, a workshop was undertaken, inviting key stakeholders from inside and outside the Council. Around 30 groups and individuals were represented at the workshop and contributed to the form and content of this document. To support this, an online questionnaire was made available, to which more than 200 residents responded, providing useful insight into the strength of public feeling about trees locally.	0
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Cheltenham Borough Council

Cabinet – 24 February 2026

Leckhampton with Warden Hill Neighbourhood Plan

– Decision on Examiner’s Recommendations and

Progression to Referendum

Accountable member:

Cllr Mike Collins, Cabinet Member Planning and Building Control

Accountable officer:

Tracey Birkinshaw, Director of Planning & Building Control

Ward(s) affected:

Leckhampton with Warden Hill

Key Decision: Yes

Executive summary:

The Leckhampton with Warden Hill Neighbourhood Development Plan (the Plan) underwent an examination following the appointment of an Independent Examiner in July 2025. The examination has now concluded, and the Examiner’s final report has been received. The Examiner has found that, with proposed modifications, the Plan meets the necessary ‘basic conditions’ and recommends that it can go forward to referendum.

In accordance with the relevant legislation, Cheltenham Borough Council (the Council) as the local planning authority (LPA) must now consider what action to take in response to the Examiner’s recommendations and also to satisfy itself that the Plan meets the necessary ‘basic conditions’.

The Council has a neighbourhood planning protocol, revised in March 2025, which sets out that at the 'Approval of Neighbourhood Plan or Order for referendum' stage, it is for Cabinet to decide whether it accepts the examination report in full or part, and that the Plan can proceed to referendum. Officers recommend acceptance of the Examiner's recommendations in full.

The Council will be required to publish a decision statement following consideration of the Examiner's report. If the recommendation is accepted, this will confirm that the Plan can go forward for a public vote in a referendum as the penultimate stage in the plan-making process. An updated version of the Plan incorporating the Examiner's recommended modifications will be produced for the referendum.

Leckhampton and Warden Hill Parish Council have presented officers with comments on the Examiners report and suggested amendments, a report setting out the officers' recommendations to these is provided at Appendix 4.

Recommendations: That Cabinet:

- 1. accepts the Examiner's recommended modifications on the Leckhampton with Warden Hill Neighbourhood Development Plan;**
- 2. agrees that a 'referendum version' of the Plan be produced (incorporating the Examiner's modifications, together with consequential and other minor corrections for accuracy), and can proceed to a referendum;**
- 3. delegates authority to the Director of Planning and Building Control, in consultation with the Cabinet Member for Planning and Building Control, to prepare the decision statement for publication.**

1. Implications

1.1 Financial, Property and Asset implications

The Council as the local planning authority will organise, hold and pay for the referendum. Financial support for neighbourhood planning is available at different stages of the process. The referendum cost is estimated to be £20k and the MHCLG funding is expected to be available before the expenditure is committed. As a result, this stage of the process should have no impact on the general funds.

Signed off by: Ela Jankowska – Finance Business Partner **Date:**09.02.2026

1.2 Legal implications

Under Regulation 17a and 18 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the local planning authority must decide what action to take in response to the Examiner's recommendations, and as soon possible after making a decision, must publish a decision statement and their reasons for it.

Signed off by: Alison McKane, Deputy Monitoring Officer

alison.mckane@cheltenham.gov.uk

1.3 Environmental and climate change implications

The Leckhampton with Warden Hill Neighbourhood Development Plan highlights concerns about flood risk and the need for mitigation and adaption to future climate, which forms part of the climate pathway. It also provides neighbourhood-level insight into walking and cycling connections that could improve sustainable travel at local level. Following the Examination, these policies have been retained.

Signed off by: Maizy McCann, Climate Officer

Maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Key priority 2: Quality homes, safe and strong communities
- Key priority 3: Reducing carbon, achieving council net zero, creating biodiversity
- Key priority 5: Taking care of your money

1.5 Equality, Diversity and Inclusion Implications

Annex 3 of the Leckhampton with Warden Hill Neighbourhood Development Plan sets out the demographic, social and economic profile of the local community. This includes data on age, gender, ethnicity, country of birth, household language, religion, belief and vulnerability. This data is then summarised within the neighbourhood profile section of the plan. The plan has a number of policies, some of which will contribute to wider social objectives. These links are summarised in table 2 of the Basic Conditions Statement.

In addition, the Basic Conditions Statement sets out that the plan has regard to and is compatible with the fundamental rights and freedoms guaranteed under the European Convention on Human Rights including the prohibition of discrimination. The statement also sets out that all reasonable attempts were made to ensure that all Leckhampton with Warden Hill Parish residents, including those living outside the

Neighbourhood Area but within the Parish, and all relevant stakeholders, were given the opportunity to contribute to and comment upon the plan

1.6 Performance management – monitoring and review

The submitted Neighbourhood Development Plan contains a section on monitoring and review. Amongst other aspects, it refers to monitoring local conditions so that information supporting policies in the Neighbourhood Plan remain up to date.

2 Background

2.1 The Leckhampton with Warden Hill Neighbourhood Development Plan (the Plan) has been produced by Leckhampton with Warden Hill Parish Council. All of the consultation requirements under Regulation 14 and 16 of the Neighbourhood Planning Regulations (2012) (the Regulations), as amended, were undertaken respectively by the Parish Council and the Council. In accordance with Regulation 17 of the Regulations (2012), the Plan was submitted for examination following the appointment of an Independent Examiner by the Council, in collaboration with the Parish Council in July 2025.

2.2 The appointed Examiner considered whether the Plan meets the ‘Basic Conditions’ and set out their considerations in a report. The Examiner was able to make one of three recommendations. These were that the plan can;

- i. go forward to a Referendum unchanged; or
- ii. go forward to a Referendum with modifications; or
- iii. not go forward.

2.3 The examination of the Plan has now concluded, and the Examiner’s report was received on 28 November 2025. The Examiner has recommended to the Council that, subject to modifications, the Plan meets the basic conditions and other statutory requirements and recommends the Plan can go forward to a referendum.

2.4 Most of the recommendations relate to textual modifications, to varying degrees, to the policies of the Plan, supporting text and supporting figures. These recommendations relate to matters of clarity and precision to ensure that the Plan fully accords with national policy, national guidance and the basic conditions.

2.5 The Examiner has recommended deleting policy LWH3 - ‘Managing and Enhancing Local Green Space’ and its supporting text from the Plan. Her reasoning is that the policy does not meet the basic conditions because little justification has been submitted for the move away from the National Planning

Policy Framework (NPPF) or the Cheltenham Plan (CP); and that local green space is covered by non-strategic CP policy GI1 in any case.

2.6 The Examiner has noted that there are numerous references to 'Valued Landscape' throughout the Plan. This includes policy LWH5 – 'Conserving and Enhancing Valued Landscape'. The Examiner has considered that the policy cannot be retained in the Plan at this point in time without further work to clarify, update and support such a policy. She has stated that to meet the basic conditions in respect of having regard to national policy and guidance insofar as evidence should be up to date and appropriate reflecting and responding to both the planning context and the characteristics of the area, the recommendation is the deletion of Policy LWH5 and its supporting text and all references to 'Valued Landscape' including that within Appendix 3 are deleted from the Plan.

2.7 Furthermore, policy LWH4 – Green Infrastructure, identifies 19 areas as green infrastructure sites that should be positively considered in new proposals for development. The Examiner has recommended that six areas are deleted from the identified sites listed. These recommendations are to ensure that the intent and clarify of the policy will meet the basic conditions in regard to national policy and guidance, and to ensure it is in general conformity with JCS policy INF3 – Green Infrastructure and will help to achieve sustainable development.

2.8 The Parish Council have made comments and requested amendments following the receipt of the Examiners' report and her recommended modifications. These comments and requested amendments can be found in Appendix 4.

2.9 In summary, the Parish Council have requested to:

- retain supporting text to policy LWH3 under preamble of the Plan,
- retain 3 areas of green infrastructure sites recommended to be deleted, and
- retain but amend elements of policy LWH5 on Valed Landscape which the Examiner recommended to be deleted.

2.10 Planning Policy and legal officers have reviewed the comments and requested changes presented by the Parish Council and Appendix 4 of this Cabinet Report provides the officers recommendations in respect in respect of each. Should Cabinet support the recommendations of officers set out in Appendix 4 when read alongside the Examiners Report, Cabinet are being asked to accept the Examiner's recommended modifications on the Leckhampton with Warden Hill Neighbourhood Development Plan, this would then enable the Borough Council to proceed to a referendum

2.11 In accordance with Regulations 17A and 18 of the Neighbourhood Planning

Regulations (2012) (as amended), the Council must decide what action to take in response to the recommendations of an examiner, including whether to extend the area in which the referendum is to take place. The Plan area differs from the existing Parish boundary which was extended after the Plan area had been designated. Following a request received from the Parish Council, the Examiner has recommended that the referendum be held for the whole of the existing Parish rather than the Plan area.

2.12 In addition, the Council must publish a decision and their reasons within a statement and the Examiners report on their website, either within 5 weeks of receiving the report or by a prescribed date agreed with the Parish Council. The Council agreed with the Parish Council that this date would be 27 February 2026.

2.13 The Council has a neighbourhood planning protocol which was first published in 2015 and updated in March 2025. This protocol sets out that at the 'Approval of Neighbourhood Plan or Order for referendum' stage, it is for the Cabinet to decide whether it accepts the recommendations made by the Examiner in their report in full or part, and that the Plan can therefore proceed to referendum. In line with the conclusions and recommendations of the examiner, a decision statement in respect to the Leckhampton with Warden Hill Neighbourhood Development Plan will be produced. The decision statement will include all modifications recommended by the examiner.

3 Reasons for recommendations

3.1 The Examiner's report and the recommended modifications have been considered by officers. The Examiner has concluded that modifications to the Plan are necessary to help ensure that the Plan is clear and precise and provides a practical framework for decision making as required by national policy and guidance, as well as to meet the other basic conditions.

3.2 The Council can decide to deviate from the recommendations made by the Examiner because of new evidence, a new fact or a different view about a fact, but in doing so must invite representations and may have to refer the issue to a second independent examination. Officers have considered the comments and amendments sought by the Parish Council post receipt of the Examiner's final report. However, officers consider that there is no new evidence submitted, no new fact or a different view that should be taken about a particular fact which would warrant deviating from the Examiner's recommendations.

3.3 Any deviation will also require a decision statement outlining the Council's rationale and reasonings that must be fully explained in planning policy terms. Officers do not see any clear reasoning or rationale in planning policy terms to deviate from the Examiner's recommended modifications.

3.4 With the incorporation of the recommended modifications suggested by the Examiner, the Council is satisfied that the Plan meets the necessary legal requirements.

4 Alternative options considered

4.1 The Council can propose making a decision that differs from the recommendations of the Examiner. In those circumstances the Council must notify prescribed persons of the proposed decision (and the reason for it) and invite representations. The prescribed persons are the following;

- i. the qualifying body (the Parish Council)
- ii. anyone whose representation was submitted to the examiner and
- iii. any consultation body that was previously consulted

4.2 Any representations must be submitted within 6 weeks first inviting representations. The Council as the local planning authority may, if it considers it appropriate to do so, refer the issue to a second independent examination. Officers consider that there are no justifiable reasons to deviate from the Examiner's recommended modifications. Seeking further representations and potentially requiring a second independent examination would also delay the process for enabling the Plan to proceed to the next stage.

5 Consultation and feedback

5.1 The Plan has already been consulted on, including at Regulation 14 and 16 stages. If the Council decides to deviate from the Independent Examiner's recommendations, they must invite representations from those interested in the Plan and may refer the issue to independent examination. The costs arising from any further consultation/examination would need to be borne by the Borough Council.

6 Key risks

6.1 As set out in Appendix 1.

Report author:

Tracey Birkinshaw, Director of Planning and Building Control.

Appendices:

1. Risk Assessment

2. Equality Impact Assessment – Screening
3. Leckhampton with Warden Hill Neighbourhood Plan 2022-2031 Independent Examiner’s Report
4. CBC Officer Comments in Response to the Parish Council Comments and Requested Amendments Post-Examiner’s Report on the LWHNDP

Background information:

[Localism Act 2011](#)

[The Neighbourhood Planning \(General\) Regulations \(2012\) \(as amended\)](#)

[Neighbourhood Planning Protocol \(2025\)](#)

[Leckhampton with Warden Hill Neighbourhood Plan 2022 – 2031](#)

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 Cabinet does not accept the recommended modifications of the Examiner in full, and suggest their own modifications, then the Council will need to invite further representations for at least 6 weeks and may require a second examination at a further cost to the Council	Director of Planning and Building Control	3	2	6	Avoid the risk	Close	The risk will be mitigated by the Cabinet decision	

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: Tracey Birkinshaw	Service Area: Planning and Building Control
Title: Director of Planning and Building Control	Date of assessment: 27 January 2026
Signature:	

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

Policy

If other, please specify:

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

Leckhampton with Warden Hill Neighbourhood Development 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 accept the recommended modifications of the Independent Examiner as set out in their report on the Leckhampton with Warden Hill neighbourhood plan, and for the Plan to go forward to a referendum
Objectives:	See above

Outcomes:	To go forward to a referendum in the Leckhampton with Warden Hill parish
Benefits:	The wider community within the Neighbourhood Plan area

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:	
<p>The decision will only determine whether the Leckhampton with Warden Hill Neighbourhood Plan can go forward to referendum where local residents can vote in favour of the plan being made part of the development plan for the Borough. The Neighbourhood Plan can only be formally made at a full Council meeting</p>	

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

f. Identify next steps as appropriate	
Stage Two required	No
Owner of Stage Two assessment	
Completion date for Stage Two assessment	

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Cheltenham Borough Council

**Leckhampton with Warden Hill
Neighbourhood Plan
2022 - 2031**

Independent Examiner's Report

By Ann Skippers BSc (Hons) MRTPI FRSA FHEA AoU

28 November 2025

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Summary

I have been appointed by Cheltenham Borough Council to carry out the independent examination of the Leckhampton with Warden Hill Neighbourhood Plan.

The Plan generally seeks to support a local community in a caring and thoughtful way. It sets out a number of challenges for the local community including an ageing population and accessibility to local services. Its seven policies cover a variety of topics that aim to connect some of the issues and challenges recognising the overlap between policy aims and outcomes.

It has however been necessary to recommend a number of modifications to help ensure the Plan is clear and precise and provides a practical framework for decision-making as required by national policy and guidance and meets the other basic conditions.

Subject to those modifications, I have concluded that the Plan does meet the basic conditions and all the other requirements I am obliged to examine. I am therefore pleased to recommend to Cheltenham Borough Council that the Leckhampton with Warden Hill Neighbourhood Development Plan can go forward to a referendum.

In considering whether the referendum area should be extended beyond the Neighbourhood Plan area, I note that the Plan area differs from the existing Parish boundary which was extended after the Plan area had been designated. I have received a request from the Parish Council that I should recommend the referendum be held for the whole of the existing Parish. There is merit in this not least to reinforce a sense of local community. I therefore recommend that the referendum be held in the Parish, rather than the Plan, area.

Ann Skippers MRTPI
Ann Skippers Planning
28 November 2025



1.0 Introduction

This is the report of the independent examiner into the Leckhampton with Warden Hill Neighbourhood Development Plan (the Plan).

The Localism Act 2011 provides a welcome opportunity for communities to shape the future of the places where they live and work and to deliver the sustainable development they need. One way of achieving this is through the production of a neighbourhood plan.

I have been appointed by Cheltenham Borough Council (CBC) with the agreement of the Parish Council to undertake this independent examination.

I am independent of the qualifying body and the local authority. I have no interest in any land that may be affected by the Plan. I am a chartered town planner with over thirty years experience in planning and have worked in the public, private and academic sectors and am an experienced examiner of neighbourhood plans. I therefore have the appropriate qualifications and experience to carry out this independent examination.

2.0 The role of the independent examiner and the examination process

Role of the Examiner

The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The basic conditions¹ are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, those European Union (EU) obligations now assimilated into UK law
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

¹ Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to neighbourhood plans. It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check² whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that
- Its policies relate to the development and use of land for a designated neighbourhood area.

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.³

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or
- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

If the plan can proceed to a referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

If the plan goes forward to referendum and more than 50% of those voting vote in favour of the plan then it is made by the relevant local authority, in this case CBC. The plan then becomes part of the 'development plan' for the area and a statutory consideration in guiding future development and in the determination of planning applications within the plan area.

² Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

³ The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

Examination Process

It is useful to bear in mind that the examiner's role is limited to testing whether or not the submitted neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and paragraph 11 of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended).⁴

Planning Practice Guidance (PPG) confirms that the examiner is not testing the soundness of a neighbourhood plan or examining other material considerations.⁵

The fact that a modification would be of benefit is not a sufficient ground in itself to recommend it. So, for example, the fact that a policy could be added to or strengthened does not justify a modification unless this is necessary for the reasons given above.

In addition, PPG is clear that neighbourhood plans are not obliged to include policies on all types of development.⁶

Often representations suggest amendments to policies or additional policies and, as in this case, the allocation of sites and have submitted extensive information to support this aim. As explained above, where I find that policies do meet the basic conditions, it is not necessary for me to consider if further amendments or additions are required and plans do not have to contain site allocations or address housing supply.

PPG⁷ explains that it is expected that the examination will not include a public hearing. Rather the examiner should reach a view by considering written representations. Where an examiner considers it necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case, then a hearing must be held.⁸

After careful consideration of all the documentation and the written representations made and an unaccompanied site visit on 30 July 2025, I decided that it was not necessary to hold a hearing.

In 2018, the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) published guidance to service users and examiners. Amongst other matters, the guidance indicates that the qualifying body will normally be given an opportunity to comment upon any representations made by other parties at the Regulation 16 consultation stage should they wish to do so. There is no obligation for a qualifying body to make any comments; it is only if they wish to do so.

⁴ Paragraph 11(3) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended) and PPG para 055 ref id 41-055-20180222,

⁵ PPG para 055 ref id 41-055-20180222

⁶ Ibid para 040 ref id 41-040-20160211

⁷ Ibid para 056 ref id 41-056-20180222

⁸ Ibid

In February 2025, the Parish Council decided to put forward a number of amendments to the Plan following the first submission (Regulation 16) period of consultation. I accepted these proposed amendments and a further period of consultation was held between 14 March until 30 May 2025.

The Parish Council made comments on both stages of consultation and I have taken these into account.

I am very grateful to everyone for ensuring that the examination has run so smoothly and in particular John Spurling and Daniel O'Neill at CBC.

The Government published a new NPPF on 12 December 2024. Transitional arrangements set out in the document⁹ explain that the policies in the updated NPPF will only apply to those neighbourhood plans submitted from 12 March 2025 onwards. As a result, this examination uses the NPPF updated in December 2023. It is noted that the Plan refers to the July 2021 version of the NPPF.

How to read this report

The report considers the submitted Plan alongside the proposed amendments put forward by the Parish Council in February 2025. The proposed amendments seek to update the Plan and respond to representations made during the first submission stage period of consultation. The proposed amendments were consulted upon during a second period of submission consultation.

Some of the proposed amendments put forward by the Parish Council are fairly straightforward matters of updates. I have only recommended modifications to the Plan where I consider they need to be made so that the Plan meets the basic conditions and the other requirements I have identified. Other amendments put forward by the Parish Council are found in Annex 1 to my report. For the avoidance of doubt, these are matters which I do not need to recommend on, but I would have no objection to adjustments of the text to accommodate these points.

Where modifications are recommended they appear in a bullet point list of **bold text**. Where I have suggested specific changes to the wording of the policies or new wording these appear in ***bold italics*** in the bullet point list of recommendations. Modifications will always appear in a bullet point list.

As a result of some modifications consequential amendments may be required. These can include changing policy numbering, section headings, amending the contents page, renumbering paragraphs or pages, ensuring that supporting appendices and other documents align with the final version of the Plan and so on.

I regard these issues as primarily matters of final presentation and do not specifically refer to all such modifications, but have an expectation that a common sense approach

⁹ NPPF December 2024, para 239

will be taken and any such necessary editing will be carried out and the Plan's presentation made consistent.

3.0 Neighbourhood plan preparation

A Consultation Statement has been submitted.

Work began in 2012/2013 with a Concept Statement and Local Green Space application; this was followed by a survey to homes for over 50s in Warden Hill in 2014. A consultation survey on the priorities for the Plan was carried out in 2015.

Two periods of pre-submission (Regulation 14) consultation were carried out. The first period was held between 1 September until 15 November 2021. All residents in the Parish were directly contacted. Two events were held. The consultation was publicised through posters, banners and social media. The comments received resulted in a revised Plan.

The second period of pre-submission consultation was held between 18 November 2022 until 20 January 2023. Leaflets were distributed to all households and again the consultation was publicised using a variety of methods. An event was also held. I note that RPS on behalf of Miller Homes was able to submit a representation until 11 April 2023.

I consider that the consultation and engagement carried out has been sufficient.

Two periods of submission (Regulation 16) consultation were held. The first period was held between 29 January until 12 March 2024. After this period, the Parish Council decided to put forward amendments to the Plan. This resulted in a second period of submission consultation. This was held between 14 March until 30 May 2025.

I have considered all of the representations received during both periods of submission consultation and taken them into account in preparing my report.

4.0 Compliance with matters other than the basic conditions

Qualifying body

Leckhampton with Warden Hill Parish Council is the qualifying body able to lead preparation of a neighbourhood plan. This requirement is satisfactorily met.

Plan area

The Plan area is the area approved by CBC on 15 September 2015 and shown on page 1 of the Plan. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements. It should be noted that this area is not the same as the boundaries of the Parish which were altered in 2018.

Plan period

The Plan period is 2022 until 2031. This is clearly stated in the Plan itself and confirmed in the Basic Conditions Statement. The requirement is therefore satisfactorily met.

- **Include plan period on the front cover of the Plan**

Excluded development

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement. This is also helpfully confirmed in the Basic Conditions Statement.

Development and use of land

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the community's priorities for the future of their local area, but are not related to the development and use of land. If I consider a policy or proposal to fall within this category, I will recommend it be clearly differentiated. This is because wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable.¹⁰

5.0 The basic conditions

Regard to national policy and advice

The Government revised the National Planning Policy Framework (NPPF) on 19 December 2023 and updated it on 20 December 2023. This revised NPPF replaces the previous NPPFs published in March 2012, revised in July 2018, updated in February 2019, revised in July 2021 and updated in September 2023.

The NPPF is the main document that sets out the Government's planning policies for England and how these are expected to be applied.

¹⁰ PPG para 004 ref id 41-004-20190509

In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the delivery of strategic policies in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.¹¹

Non-strategic policies are more detailed policies for specific areas, neighbourhoods or types of development.¹² They can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment as well as set out other development management policies.¹³

The NPPF also makes it clear that neighbourhood plans gives communities the power to develop a shared vision for their area.¹⁴ However, neighbourhood plans should not promote less development than that set out in strategic policies or undermine those strategic policies.¹⁵

The NPPF states that all policies should be underpinned by relevant and up to date evidence; evidence should be adequate and proportionate, focused tightly on supporting and justifying policies and take into account relevant market signals.¹⁶

Policies should be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. They should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area including those in the NPPF.¹⁷

On 6 March 2014, the Government published a suite of planning guidance referred to as Planning Practice Guidance (PPG). This is an online resource available at www.gov.uk/government/collections/planning-practice-guidance which is regularly updated. The planning guidance contains a wealth of information relating to neighbourhood planning. I have also had regard to PPG in preparing this report.

PPG indicates that a policy should be clear and unambiguous¹⁸ to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the planning context and the characteristics of the area.¹⁹

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.²⁰ It continues that

¹¹ NPPF para 13

¹² Ibid para 28

¹³ Ibid

¹⁴ Ibid para 29

¹⁵ Ibid

¹⁶ Ibid para 31

¹⁷ Ibid para 16

¹⁸ PPG para 041 ref id 41-041-20140306

¹⁹ Ibid

²⁰ Ibid para 040 ref id 41-040-20160211

the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.²¹

Whilst this has formed part of my own assessment, the Basic Conditions Statement clearly sets out how the Plan's policies correspond to the NPPF.

Contribute to the achievement of sustainable development

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development.

The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.²² This means that the planning system has three overarching and interdependent objectives which should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives.²³

The three overarching objectives are:²⁴

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but should take local circumstances into account to reflect the character, needs and opportunities of each area.²⁵

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how each Plan policy helps to achieve each of the objectives of sustainable development as outlined in the NPPF.

²¹ PPG para 040 ref id 41-040-20160211

²² NPPF para 7

²³ Ibid para 8

²⁴ Ibid

²⁵ Ibid para 9

General conformity with the strategic policies in the development plan

The development plan consists of a number of different documents; the Joint Core Strategy 2017 (JCS), the Cheltenham Plan 2020 (CP) and the saved policies of the Cheltenham Borough Local Plan 2006.

The JCS covers strategic housing, employment and infrastructure requirements across the JCS area. The JCS was adopted in December 2017. CBC consider all the policies in the JCS to be strategic in nature.

The CP provides the local-level development strategy for the borough. It supports the level of growth set out in the JCS by providing specific policy guidance for new development in the area and makes smaller-scale local allocations. The CP was adopted on 20 July 2020. CBC consider that the policies in the CP are non-strategic in nature. However, I refer to these policies on occasion when they gave further context to my discussion.

The LP 2006 contains a number of saved policies.

The Gloucestershire Waste Core Strategy and the Gloucestershire Waste Local Plan also form part of the development plan, but are not directly relevant to this examination.

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out the relationship between the policies of these various development plan documents and the Plan policies.

Emerging policy at Borough level

Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are producing a Strategic and Local Plan (SLP). The SLP will provide an overarching planning strategy, shared policies covering all three councils, and local policies covering matters of local importance. The SLP is at a relatively early stage.

European Union Obligations

Strategic Environmental Assessment

A Determination Statement on the need for SEA and HRA dated November 2022 has been prepared by CBC. In turn this refers to a Screening Opinion on the need for Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Statement of Reasons document dated November 2022 prepared by CBC. The Screening Opinion in turn refers to information prepared by Andrea Pellegram Ltd and dated 13 June 2022. All concluded that the Plan was unlikely to have significant environmental effects.

Consultation with the statutory bodies was undertaken. Responses from the Environment Agency, Historic England and Natural England were received. All concurred with the conclusions of the Screening Opinion.

I have treated the Determination Statement and the Screening Opinion Statement of Reasons together to be the statement of reasons that the PPG advises must be prepared and submitted with the neighbourhood plan proposal and made available to the independent examiner where it is determined that the plan is unlikely to have significant environmental effects.²⁶

Taking account of the characteristics of the Plan, the information put forward and the characteristics of the areas most likely to be affected, I have no reason to disagree with the conclusions of the Determination Statement and consider that the requirements in respect of SEA have been met.

Habitats Regulations Assessment

The same Determination Statement and Screening Opinion Statement of Reasons refer to HRA. They conclude that no likely significant effects are predicted, either alone or in combination with other plans and projects.

Natural England concurred with the findings of the Screening Opinion.

The Determination Statement concludes that Appropriate Assessment (AA) is not required.

Taking into account the distance from, the nature and characteristics of the European sites and the nature and contents of the Plan, I have no reason to disagree with the conclusion of the Determination Statement and consider that the prescribed basic condition relating to the Conservation of Habitats and Species Regulations 2017 is complied with.

European Convention on Human Rights (ECHR)

The Basic Conditions Statement contains a comprehensive statement in relation to human rights and equalities. Having regard to the Basic Conditions Statement, there is nothing in the Plan that leads me to conclude there is any breach or incompatibility with Convention rights.

PPG establishes that the ultimate responsibility for determining whether a plan meets EU obligations lies with the local planning authority.²⁷ CBC has not raised any concerns in this regard.

²⁶ PPG para 028 ref id 11-028-20150209

²⁷ Ibid para 031 ref id 11-031-20150209

6.0 Detailed comments on the Plan and its policies

In this section I consider the Plan and its policies against the basic conditions. Where modifications are recommended they appear in **bold text**. As a reminder, where I suggest specific changes to the wording of the policies or new wording these appear in **bold italics**.

The Plan is presented to a good standard and contains seven policies. There is a message from the Chair, a list of acronyms and abbreviations and a helpful contents page at the start of the Plan.

Neighbourhood Planning Area

This section usefully explains that the Parish area has been extended as a result of an amendment in 2018 and is larger than the approved designated area for the Plan.

The Role and Scope of the Neighbourhood Plan

This section sets out detailed information about neighbourhood plans in general and this one in particular.

It includes a section that details the soundness requirements for local plan rather than neighbourhood plan examinations. In the interests of accuracy, this should be deleted.

A reference is made to the Cotswolds Area of Outstanding Beauty Management Plan 2018 – 2023. Whilst this was current when the Plan was submitted, this document has now been superseded. It does not form part of the development plan. The reference should therefore be removed.

At this juncture, I note that the southeastern part of the Plan area lies within the Cotswolds National Landscape (NL). The Parish Council has considered the duty amended by the Levelling-up and Regeneration Act 2023²⁸ on relevant authorities in respect of their functions which affect land in NLs. Relevant authorities must now ‘seek to further’ the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to ‘have regard to’ their statutory purposes. Guidance²⁹ issued by the Government gives further information about how the duty should be applied. As a result, I recommend that additional wording be incorporated into the Plan and thank the Parish Council for helpfully providing me with some appropriate wording.

- **Delete the sentence and subsequently a) – d) points in paragraph 8 on page 4 of the Plan that starts “Key elements of this examination will...”**

²⁸ Levelling up and Regeneration Act 2023 s245

²⁹ Guidance issued 16 December 2024

- Delete the reference to the Cotswolds AONB Management Plan in paragraph 12 on page 4
- Add a new sub section after paragraph 13 on page 5 of the Plan titled *“Cotswolds National Landscape”* and add the following seven new paragraphs:

“Part of the Cotswolds National Landscape (NL) designation lies within the southeast part of the Leckhampton with Warden Hill Neighbourhood Area and is also immediately adjacent to it along the eastern part of the southern border of the area covered by the Neighbourhood Plan.

In landscape terms the Cotswolds escarpment provides a high-quality backdrop to the Neighbourhood Area and the area covered by the Neighbourhood Plan plays an important contribution to the setting of the NL. The requirement for neighbourhood plans to reflect NL designations is set in legislation with the 2023 Levelling Up and Regeneration Act (s245) and subsequent 2024 Government guidance, placing a duty on those bodies preparing a neighbourhood plan to further the purposes of the NL.

Therefore, this Neighbourhood Plan must consider how the duty has been met. Since its inception in 2012, local volunteers have sought to create a Neighbourhood Plan that recognises, protects and enhances the unique characteristics of the Neighbourhood Area in relation to the Cotswolds National Landscape. It has placed the role that development within the Neighbourhood Area plays in affecting the National Landscape at the heart of the Neighbourhood Plan. This is evident in the discussion of key challenges for the Neighbourhood Plan which overall seeks to positively support key outcomes sought in the Cotswolds National Landscape Management Plan 2025-2030 prepared by the Cotswolds National Landscape Management Board.

- Update references to “AONB” in paragraph 14 on page 5 of the Plan and elsewhere in the Plan to *“National Landscape”*

Consultation with the Community

This section details the engagement carried out with the local community over a sustained period of time and signposts the reader to further information in other documents.

Profile of Neighbourhood Area

This is an informative section about the history and present attributes of the Parish. Some natural updating may be needed including references to the Census 2021. I regard these as matters of final presentation.

Key Challenges, Vision and Objectives

The vision for the area is:

“By 2031, the Leckhampton with Warden Hill Neighbourhood Plan Area will look and feel better than it does today. Essential valued landscape and visual characteristics of the area, and areas of tranquillity, will remain in place. The area will be greener, more sustainable and better protected from flood risk. More people will be able to find a home that meets their needs. More people will work locally. They will be able to walk and cycle to a good network of local shops and community facilities. People will be able to live healthier lives.”

The vision is underpinned by five objectives. Objective 2 refers to a site allocation MD4 which is now under construction and therefore this objective is no longer needed.

Both the vision and the other objectives are clearly articulated. They are based on a comprehensive discussion in this chapter of the Plan about the challenges and opportunities facing the local community.

The Parish Council has also put forward some amendments to the objectives and these are found in Annex 1 of this report.

- **Delete objective 2**

Shopping and Community Facilities

The Plan rightly considers that the availability of shops and other services is an integral part of promoting a good quality of life for local residents. It also helps to maintain a healthy lifestyle as well as promoting local accessibility in relation to tackling climate change and local issues of air quality for instance.

The Plan’s stance has regard to the NPPF. In supporting a prosperous rural economy, the NPPF expects planning policies to enable the retention and development of accessible local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.³⁰ It also states that policies should guard against the unnecessary loss of valued facilities and services as part of its drive to promote healthy and safe communities, particularly where this would reduce the community’s ability to meet day to day needs.³¹

Policy LWH1 – Grocery Shops and Community Facilities has a number of different elements to it. The first element refers to community facilities and JCS Policy INF4 and non-strategic CP Policy CI1.

One of the ambitions of the JCS is a thriving economy. JCS Policy INF4 refers to social and community infrastructure. Local shops are referenced in the supporting text. Any

³⁰ NPPF para 88

³¹ Ibid para 97

change of use of a community facility has to show why it is no longer required and, if appropriate, where alternative replacement facilities will be provided. New residential development creating a need for community facilities is expected to provide such provision either on-site or through off-site contributions. Finally, any provision should be centrally located.

Non-strategic CP Policy CI1 stipulates that development will only be permitted where adequate community infrastructure capacity exists, or where additional capacity is capable of being provided as part of the development without unacceptable impacts on people or the environment. Such capacity will be secured through planning obligations.

Policy LWH1 refers to Table 2, found on page 27 of the Plan. Table 2 lists a number of community facilities identified as being of particular importance to the local community. These include Churches, Village Halls and schools. These facilities seem to me to have been identified logically.

Policy LWH1 sets out a regard for JCS Policy INF4 and non-strategic CP Policy CI1 indicating that the facilities listed in Table 2 are identified as priorities for retention and improvement. For me, there is little need to refer to the two higher tier policies. I appreciate that their stance aligns well with key objectives of the Plan. However, the Plan can stand on its own two feet.

The last part of this first element of the policy refers to Use Classes F1 and F2 indicating that development away from these uses will only be permitted when there is suitable alternative provision. The Use Classes Order is however more robust on this matter as it, respectively, only allows temporary changes of use or no permitted changes.

Therefore I recommend some modifications to the first element of Policy LWH1 to ensure it is clearly written and unambiguous, does not unnecessarily duplicate other policies and serves a clear purpose for this Plan area in line with national policy and guidance. This includes referring to community facilities in general as well as those identified in Table 2.

The second and third elements of the policy refer to applications for prior approval via Use Class MA and applications for changes of use from Use Class F2. Both elements in effect add a further provision to the Use Classes Order which is not acceptable to do as this goes beyond the remit of the Plan.

The fourth element of Policy LWH1 supports the enhancement of existing shops; this is not controversial.

The last element of the policy seeks to ensure that residents of larger development schemes have access to a grocery store within 800m of the development. This latter part of the policy has attracted opposition from the development industry. In essence, the concern is that this is not evidence based and will limit the number of sites coming forward, affect the viability of sites and therefore hinder the central aim of the planning system to achieve sustainable development.

I note that JCS Policy INF4 specifically states that new residential development creating a need for community facilities is expected to provide such provision on-site or through off-site contributions and that such provision should be centrally located. Furthermore the supporting text to JCS Policy INF4 states that everyone should have access to facilities to meet their everyday needs. I see grocery shops as, at least, partly fulfilling everyday needs and forming part of a balanced community.

So, in my view the requirement of the policy aligns well with the intentions of the NPPF, JCS Policy INF4 and non-strategic CP Policy CI1 and is supported by the work in this chapter of the Plan which sets out in considerable detail using 1000m, 800m and 500m radii on the retail provision available to the local population. I have however added a reference to viability and site specific considerations to ensure that these issues are properly considered as part of the requirement and this should help to address the concerns of the development industry.

I otherwise note that the approach taken is generally welcomed by various consultees including National Highways and the Public Health and Employment arms of Gloucestershire County Council (GCC).

With the modifications set out below, Policy LWH1 will meet the basic conditions by having regard to national policy, being in general conformity with development plan policies and JCS Policy INF4 in particular and helping to achieve sustainable development in this local community.

- **Amend Policy LWH1 to read:**

“Community Facilities

Local, social, community, health and recreational facilities play a valuable role in meeting the needs of the local community. All such facilities will be protected from change of use to other non-community uses unless there is no proven need for the facility or an equivalent replacement facility is provided in an accessible location.

The facilities listed in Table 2 are especially important to the local community. Proposals for their change of use or redevelopment will not generally be supported. Proposals which enhance or improve these facilities will be generally supported.

Grocery Shops

Applications for development to improve existing shops will be supported in principle.

New residential development *on* sites larger than 1 hectare should not normally be permitted unless suitable local grocery shop provision exists or *is to be provided* within 800 metres of the *development site subject to viability*

and site specific considerations.”

- **Update supporting text to reflect that MD4 has now been consented and to update any references to the NPPF as necessary**

Walking, Cycling and Sustainable Travel

The Plan explains the importance of setting out objectives for more sustainable transport and active travel in the Plan area and of course beyond it, given that connections to walking and cycling routes for instance are a vital part of this. To this end Appendix 1 of the Plan contains a Transport and Travel Plan. This is well written and considers priorities and their delivery whilst recognising that the Parish Council will have to work with other partners to achieve many of its goals.

The NPPF promotes sustainable transport indicating such issues should be considered early on in the plan-making process to, amongst other things, address any potential impacts, ensuring that environmental impacts can be taken into account including mitigation of any adverse effects and ensuring that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.³²

The NPPF is clear that planning policies should protect and enhance public rights of way (PROW) and access taking opportunities to provide better facilities for users.³³ The NPPF seeks to enable and support healthy lifestyles including through the protection and enhancement of PROW including through adding links to existing networks.³⁴

Such networks can also help with providing opportunities and options for sustainable transport modes.³⁵

The NPPF states that planning policies should aim to achieve healthy, inclusive and safe places including through clear and legible pedestrian and cycle routes and the promotion of opportunities for social interaction through such connections within and between neighbourhoods³⁶ and to ensure an integrated approach to considering the location of housing, economic uses and community facilities.³⁷

One of the ambitions in the JCS is a healthy, safe and inclusive community; promoting sustainable transport is a strategic objective to help to achieve this. JCS Policy SD4 on design requirements includes reference to movement and connectivity indicating that new development should be designed to integrate with existing development and prioritise movement by sustainable transport modes.

JCS Policy INF1 refers to the transport network and, amongst other things, refers to the

³² NPPF para 108

³³ Ibid para 104

³⁴ Ibid

³⁵ Ibid paras 108, 110

³⁶ Ibid para 96

³⁷ Ibid para 97

provision of connections for walking, cycling and passenger networks.

In order to address these issues, **Policy LWH2 – Transport Plan, Walking and Cycling** refers to a partnership working approach and the Transport and Travel Plan. The first element of the policy sets out five aims including improved traffic management and enhanced walking and cycling links.

The second element of Policy LWH2 sets out support for various routes.

The Parish Council has put forward some amendments to the text of the policy. These make the policy clearer as to the status of the Transport and Travel Plan and the routes identified. I recommend some different, and other, modifications to ensure the policy has regard to national policy and guidance in relation to its clarity.

Furthermore I recommend that Appendix 1 is renamed to avoid confusion with Transport and Travel Plans that we are perhaps more familiar with in relation to development management.

I note that the approach taken is generally welcomed by various consultees including National Highways and the Public Health and Transport/Active Travel arms of GCC.

The Parish Council has put forward amendments to paragraph 148 of the supporting text and suggested a new paragraph. These are included in Annex 1 of this report.

With these modifications, Policy LWH2 will meet the basic conditions by having regard to the NPPF, is in general conformity with the development plan and especially those policies referred to above, and will help to achieve sustainable development.

- **Change the title of Policy LWH2 to “*Local Sustainable Transport Priorities*”**
- **Revise Policy LWH2 to read:**

“Development proposals should seek to improve walking and cycling connectivity throughout the Leckhampton with Warden Hill Neighbourhood Area and promote sustainable travel.

Where appropriate to the type and scale of development, this should include positive consideration of opportunities to help deliver the following recommendations set out in the Sustainable Transport Priorities for Leckhampton with Warden Hill Parish document in Appendix 1, including:

- **The development of *improved* walking and cycling connections and cycle racks at key destinations**
- **Improved traffic management including lower speed limits**
- **Reallocation of priority on highways to cyclists and pedestrians**
- **Support for the retention of key local facilities *in sustainable locations and***
- **Better provision and distribution of public transport routes, services and**

stops.

Improvements to key walking and cycle routes identified as community priorities within the Neighbourhood Plan area indicatively shown on Figure 10 which are particularly encouraged are:

- a) Improved routes and crossing facilities *from Leckhampton* across A46 highway to the edge of the Neighbourhood Plan Area in the direction of St James Primary School and Bournside.
 - b) Improved routes *along Farm Lane* and crossing facilities *from Leckhampton (in the vicinity of Kidnappers Lane)* across the A46 highway to Salisbury Avenue Neighbourhood Centre and Warden Hill Primary School.
 - c) Improved facilities along the A46 within the Neighbourhood Area in the direction of Shurdington.
 - d) From High School *Leckhampton* to school catchment residential areas to the north, also connecting to the local GP surgery at Moorend Park Road.
 - e) From High School Leckhampton towards and across Leckhampton Road to school catchment areas to the east.
 - f) From High School Leckhampton across Church Road to Collum End Rise, The Close and areas to the south east via Kidnappers Lane.”
- Rename Appendix 1 Transport and Travel Plan to “*Sustainable Transport Priorities for Leckhampton with Warden Hill Parish*” [consequential amendments to references to the Transport Plan in the Appendix should also be changed]

Local Green Space

Policy LWH3 – Managing and Enhancing Local Green Space seeks to set out how Local Green Spaces (LGS) will be managed at a local level indicating the type of development that may be found to be acceptable. This Plan does not seek to designate any LGSs.

The NPPF explains that LGSs are green areas of particular importance to local communities.³⁸ The designation of LGSs should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.³⁹ It is only possible to designate LGSs when a plan is prepared or updated and LGSs should be capable of enduring beyond the end of the plan period.⁴⁰

³⁸ NPPF para 105

³⁹ Ibid

⁴⁰ Ibid

The NPPF sets out three criteria for green spaces.⁴¹ These are that the green space should be in reasonably close proximity to the community it serves, be demonstrably special to the local community and hold a particular local significance and be local in character and not be an extensive tract of land. Further guidance about LGSs is given in PPG.

With regard to the management of development in LGSs, the NPPF is clear that policies for managing development within a Local Green Space should be consistent with those for Green Belts.⁴²

Non-strategic CP Policy GI1 refers to LGS. This CP policy designated the Leckhampton LGS and its extent is shown on Figure on page 36 of the Plan. Non-strategic CP Policy GI1 sets out that development will not be permitted within a LGS unless there are very special circumstances which outweigh the harm to the LGS. The policy continues that particular attention will be paid to the views of the local community in assessing any development proposals that affect a designated LGS.

The Plan explains that the Parish Council would like to work with others to develop a management plan for the LGS.

Policy LWH3 sets out a number of specific elements such as benches, signposts and other development that would be supported in the LGS. It may be the case that some of these elements do not require planning permission. In other cases, the policy wording may, however inadvertently, limit the development that might be acceptable under Green Belt policy. In any case the NPPF and non-strategic CP Policy GI1 set out the policy for managing development in this LGS. Little information has been submitted to support a move which might be different from the stance in the NPPF or the CP.

The second element of Policy LWH3 refers to development sites adjoining LGSs seeking consideration of the adjacent LGSs in relation to their history, landscape and rural character and the objectives developed as part of the management plan. This is arguably unnecessary as any development would take account of its context in any case and the management plan has not yet been developed as I understand it.

Therefore, having considered the matter carefully, Policy LWH3 does not meet the basic conditions because little justification has been submitted for the move away from the NPPF or the CP; the LGS is covered by non-strategic CP Policy GI1 in any case and the second element would occur anyway.

The desire to produce a management plan for the LGS is clearly of great importance to the local community. It is, however, in my view, an aspiration rather than a development and use of land policy. I see this mechanism as being the more appropriate way for managing the future of this particular LGS given it is designated through the CP. For that reason I recommend the policy and supporting text be deleted from the Plan, but the desire to produce a management plan in association with

⁴¹ NPPF para 106

⁴² Ibid para 107

partners (which should include the local planning authority and any landowners) to look at this issue comprehensively could be included in the Plan as a community aspiration, if so desired.

- **Delete Policy LWH3 and its supporting text (paragraphs 149 – 155 inclusive)**

Green Infrastructure

The NPPF states that policies should contribute to and enhance the natural and local environment including through the protection of valued landscapes and sites of biodiversity value, recognising the intrinsic character and beauty of the countryside and, minimising impacts on, and providing net gains for, biodiversity.⁴³

To protect and enhance biodiversity, the NPPF encourages plans to identify and map and safeguard local wildlife rich habitats and ecological networks, wildlife corridors and promote priority habitats as well as pursuing net gains for biodiversity.⁴⁴

The NPPF's glossary defines green infrastructure (GI) as a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

As part of its drive to promote healthy and safe communities, the NPPF recognises the provision of safe and accessible GI can enable and support healthy lifestyles.⁴⁵

The NPPF indicates that plans should take a proactive approach to mitigating and adapting to climate change, taking into account long-term implications and support appropriate measures to ensure that communities are resilient to climate change impacts.⁴⁶

As part of this drive, new development should be planned in ways that, amongst other things, utilise GI as appropriate adaptive measures.⁴⁷

One of the ambitions in the JCS is to have a sustainable natural, built and historic environment. JCS Policy SD9 encourages new development to contribute positively to biodiversity and geodiversity whilst linking with wider networks of GI.

JCS Policy INF3 refers to GI; it conserves and enhances both strategically and locally important networks and seeks to improve the quantity and quality of these assets, improve linkages and design improvements that supports the cohesive management of GI. Amongst other things, it refers to strategic allocations and the delivery of connectivity through the site.

⁴³ NPPF para 180

⁴⁴ Ibid para 185

⁴⁵ Ibid para 96

⁴⁶ Ibid para 158

⁴⁷ Ibid para 159

Non-strategic CP Policy CI1 only supports development where adequate community infrastructure capacity exists or where additional capacity is capable of being provided satisfactorily. It indicates that obligations may include GI, amongst other things.

The Plan rightly recognises the multi-faceted role of GI. A survey of GI has been carried out for the Plan area. Appendix 2 details the identified sites and they are shown on Figure 12 on page 39 of the Plan. There is little information about how the survey has been carried out or the criteria used for identification of the sites. Nevertheless Appendix 2 is a comprehensive document. I was able to see these areas or understand their context when I visited the area.

As part of the proposed amendments put forward to Appendix 2 by the Parish Council, Area 7 is to be deleted from Figure 12 and various amendments are put forward to Areas 6, 9, 13 and 17.

I accept the deletion of Area 7 from the GI list as proposed by the Parish Council.

In relation to Areas 6 and 17, both form part of the strategic site of MD4 and will be planned as part of the comprehensive development area. This is not to say these areas do not make important contributions to the GI network, but that, given the stage of development of this strategic site, they may be better incorporated into any “list” at a later stage once they can be reassessed.

With regard to Area 9, I understand planning permission has now been granted for 30 dwellings. The Appendix as proposed to be amended by the Parish Council recognises that permission has been granted, but still seeks the area to be protected from any other development. This is not an appropriate mechanism to do this and to include the area within the “list” could prevent the proper planning of what is now in effect a committed development site.

With regard to Area 13, the justification for this area’s inclusion appears to relate to detail over what development on the site should or should not do rather than any reasons for its importance as part of any GI network.

In addition, Area 8 is the school site. This should be reassessed as the development has been completed.

Modifications are accordingly made in relation to each of the specific areas identified in Appendix 2. I am satisfied that the other areas identified in Appendix 2 are of sufficient merit to warrant inclusion on this “list”.

Policy LWH4 – Green Infrastructure refers to Appendix 2 and Figure 12. The policy requires new development to consider these areas positively. It continues that, where possible, new development should contribute to GI through the provision of new GI or enhancement of existing GI. The last element of the policy seeks support for the maintenance and improvement of GI through developer contributions where appropriate.

Whilst I accept there is some overlap with JCS Policy INF3 which arguably sets out more detail, Policy LWH4 can be regarded as a local interpretation of that policy, particularly given the identification of specific areas regarded as particularly important by the local community.

With some modification to help with intent and clarity, the policy sets out to achieve the aims of the NPPF. Therefore with these modifications, the policy will meet the basic conditions. It has regard to national policy and guidance, is in general conformity with JCS Policy INF3 in particular and will help to achieve sustainable development.

Paragraph 161 on page 39 of the Plan refers to a number of development plan policies. In the interests of clarity, a reference is added to this paragraph.

- **Amend Policy LWH4 to read:**

“The role and *function of green* infrastructure identified in Figure 12 and in Appendix 2 should be positively considered and *taken into account, where appropriate*, in new proposals for development.

Where feasible, every opportunity should be taken for new development to contribute to local green infrastructure provision either through onsite provision or through the enhancement of existing provision.

The protection and enhancement of green infrastructure will be encouraged to be supported through developer contributions as appropriate to the type and scale of the proposal.”

- **Amend paragraph 161 on page 39 of the Plan to read:**

“Strategic policies in local plans provide general policy support for the retention of existing open/green spaces of different kinds (see policies GE1 and GE2 in saved policies from the 2006 Local Plan, and from the Cheltenham Plan Policies D1 Design, D3 Private Green Space, Para 16.3 incidental green space, CI1 b) developer contributions, CI2 Sports and Open Spaces provision in new residential development). Local Green Space has specific protection also (see Cheltenham Plan Table 7, site 14).

- **Delete Areas 6, 7, 8, 9, 13 and 17 from Figure 12 on page 39 of the Plan and from Appendix 2**

Valued Landscape

This chapter is titled “Valued Landscape” and there are numerous references to “Valued Landscape” throughout the Plan including in the vision and objectives.

There is one policy in this section: **Policy LWH5 – Conserving and Enhancing Valued Landscape**. The policy is criteria-based setting out principles that new development

should follow in the Plan area. The supporting text to the policy discusses work carried out principally by Lepus Consulting Ltd, an established and respected environmental planning practice.

The work carried out by Lepus consists of a Landscape Character Assessment Update (LCA) of September 2022 that updates an earlier Landscape and Visual Appraisal undertaken in 2017. The LCA is included as Annex 4 of the Plan. There is also a Statement on Valued Landscape in Appendix 3 of the Plan.

The LCA describes its purpose as:

- “To identify, conserve and inform the management of the distinctive landscape characteristics of the study area;
- To inform the development of the NP and provide evidence for landscape and character policies;
- To identify the special landscape qualities of the area to help ensure that new development proposals are of an appropriate design and complement the existing local character;
- To be used by developers and their architects to help them understand the local character; and
- To inform decision makers in relation to planning applications.”⁴⁸

The LCA is based on a Study Area which is reproduced in Figure 13 on page 45 of the Plan. The Study Area essentially covers all the Plan area except the established built up areas. The Study Area includes part of the Cotswolds NL to the southeast and all of the LGS designated in the CP.

Valued landscape is specifically referred to in the NPPF⁴⁹, but is without definition in the NPPF. The title of the chapter and policy refer to “Valued Landscape”.

Firstly, it is not clear to me whether the Plan seeks to designate an area as valued landscape. The use of the phrase as a proper noun suggests a designation to me. However, there is nothing in the Plan to suggest it seeks to designate a specifically identified area and no map identifies it as such and the policy does not cross refer to any map.

Paragraph 168 of the supporting text also helps to reinforce my suspicion that no specific area is intended for designation by indicating that Figure 13 identifies the broad locational applicability of the recommendations. The recommendations referred to are found in the LCA; these are reproduced in the Plan as Table 3. Paragraph 168 then

⁴⁸ LCA page 8

⁴⁹ NPPF para 180

explains that Policy LWH5 sets policy to implement these recommendations where appropriate.

Nevertheless, plainly the LCA's Study Area is more than a starting point. The LCA was undertaken in 2022 and predates an appeal decision on land south of A46 Shurdington Road that was determined by the Secretary of State on 27 February 2024.⁵⁰ With the passage of time, the LCA is based on a Study Area which, in my view, would benefit from a review as a result of this and other more recent appeal decisions.

Therefore there can be no designation of a specific area of land as a Valued Landscape until a review of the Study Area can take place. Those references to "Valued Landscape" should therefore be deleted from the Plan in the interests of clarity.

Secondly, given that the LCA would benefit from a further update which has simply resulted from the passage of time, its recommendations must be viewed with some degree of caution. This is particularly the case given the LCA took a broad brush approach treating the Study Area as a single entity and concluded that the area is "highly valued".⁵¹ It is therefore difficult for me to judge which recommendations remain wholly valid or whether different ones would now come to the fore.

So the question now is whether the policy is appropriate to retain in the Plan given that I have found that the LCA on which it largely relies needs review. Regrettably, I have concluded that the policy so largely relies on the LCA work, it would not be possible to do this through modification and it would not be appropriate for me to rewrite it and much of the chapter.

In reaching this conclusion, I am mindful that there are a number of policies already in place that seek to conserve and enhance landscape and ensure due consideration is given in the determination of any planning applications. The NPPF states that the natural and local environment should be enhanced including through the protection of valued landscapes and sites of biodiversity or ecological value and soils in a manner commensurate with their statutory status or identified quality in the development plan and through recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems services.⁵²

PPG recognises that land in the setting of NLs can also make an important contribution, particularly where there are long distance views are important or where the adjoining land has landscape character that is complementary to that within the NL.⁵³ This is very much the case here.

A number of development plan policies also refer to landscape. Of most relevance are JCS Policies SD4, SD6, SD7 and INF3.

⁵⁰ APP/B1605/W/22/3309156

⁵¹ LCA page 67

⁵² NPPF para 180

⁵³ PPG para 042 ref id 8-042-20190721

Nothing in my approach should be taken as indicating that at least some of land in the LCA Study Area is not likely to be worthy of being a valued landscape. In fact, I find the contrary to be the case.

The LCA shows that the area in general scores highly against the criteria in the widely used Landscape Institute TGN 02-21 guidance on assessing landscape value outside national designations. The LCA concluded that the area is “highly valued”.⁵⁴

In addition, the Inspector in the aforementioned appeal accepted that the land covered by the LGS was valued landscape at the time of the appeal.⁵⁵

Furthermore, the representation from the Cotswolds NL Team clearly regards the general area as falling within the setting of the NL and robustly supports Policy LWH5.

There is therefore a weight of evidence to support the work carried out on this Plan on this general area. My site visit also reinforced this where I could see and understand the landscape in its context including as part of the setting to the NL.

However, this does not alter my judgment that this chapter and Policy LWH5 cannot be retained in the Plan at this point in time without further work to clarify, update and support such a policy. In order to meet the basic conditions in respect of having regard to national policy and guidance insofar as evidence should be up to date⁵⁶ and appropriate reflecting and responding to both the planning context and the characteristics of the area,⁵⁷ I recommend Policy LWH5 and its supporting text and all references to “Valued Landscape” are deleted from the Plan.

- **Delete the section on “Valued Landscape” and Policy LWH5**
- **Consequential amendments will be needed to delete the reference to Policy LWH5 in Table 1 on page 6; replace the words “Valued Landscape and a..” in paragraph 36 on page 10 with “...the...”; delete paragraphs 78 and 79 on page 16 in their entirety [a new paragraph setting out the factual context of landscape in the Plan can be inserted with the agreement of the local planning authority]; change the words “Valued Landscape” in objective 3 on page 18 and paragraph 156 on page 38 to “*landscape*”; change the words “...strategic Valued Landscape” in paragraph 157 on page 38 to “*landscape*”**
- **Remove Appendix 3 from the Plan**

⁵⁴ LCA page 67

⁵⁵ APP/B1605/W/22/3309156 para 111

⁵⁶ NPPF para 31

⁵⁷ PPG para 041 ref id 41-041-20140306

Local Heritage

The NPPF is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.⁵⁸ It continues⁵⁹ that great weight should be given to the assets' conservation when considering the impact of development on the significance of the asset.

In relation to non-designated heritage assets, the NPPF states that the effect of any development on its significance should be taken into account and that a balanced judgment will be needed having regard to the scale of any harm or loss and the significance of the heritage asset.⁶⁰

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes which have heritage significance, but do not meet the criteria for designated heritage assets. PPG advises there are various ways that such assets can be identified including through neighbourhood planning.⁶¹

However where assets are identified, PPG advises that it is important decisions to identify them are based on sound evidence.⁶² There should be clear and up to date information accessible to the public which includes information on the criteria used to select assets and information about their location.⁶³

In this case, a list of Non-designated Heritage Assets has been produced by the Parish Council. The list has been compiled based on CBC's Index of Buildings of Local Interest Supplementary Planning Document (SPD) adopted in 2007 and Historic England's published guidance. It has taken a logical approach and supports the designation of these locally important buildings, areas and structures.

JCS Policy SD8 sets out that the built, natural and cultural heritage will continue to be valued and promoted for their contribution to local identity, quality of life and the economy. Development should make a positive contribution to local character and distinctiveness. In relation to non-designated heritage assets, Policy SD8 conserves and enhances these appropriate to their significance and for their contribution to local character, distinctiveness and sense of place.

Non-strategic CP Policy HE1 refers to buildings of local importance and non-designated heritage assets. It protects such assets from demolition or substantial alteration unless it can be shown that all reasonable steps have been taken to retain the building, its retention would be demonstrably impracticable and the public benefits of any scheme outweigh the building's retention. Development that affects a non-designated heritage asset, including its setting, is required to have regard to the scale of any harm or loss to the significance of the asset.

⁵⁸ NPPF para 195

⁵⁹ Ibid para 205

⁶⁰ Ibid para 209

⁶¹ PPG para 040 ref id 18a-040-20190723

⁶² Ibid

⁶³ Ibid

Policy LWH6 – Non-Designated Heritage Assets seeks to designate and then protect or enhance the locally identified heritage assets in Appendix 4.

I note that there is some duplication in Appendix 4 with repetition of the assets identified from page 10, but the earlier entries have an area identified on the map insets. The latter should be removed to avoid any confusion.

Two of the proposed areas for inclusion as non-designated heritage assets have maps which I found quite hard to decipher on the ground and therefore require more precision as to the boundaries of these areas. A modification is made that will address this concern.

The Plan explains that Appendix 4 will be regularly updated and so is a ‘living’ document. The intention of a ‘living document’ such as Appendix 4 is understood. However, if Appendix 4 is amended, there would be no mechanism to judge whether any asset included in the future on such a list is actually of merit. Given that the policy usefully refers to CBC’s Index of Buildings of Local Interest, there is a route to including other assets through CBC or indeed by reviewing the Plan. A modification is therefore made to this effect to the wording of Appendix 4.

In order for Policy LWH6 to meet the basic conditions, a modification to its wording is made. This is to ensure that it has regard to the NPPF in how such assets will be considered in relation to planning applications where harm may be caused.

With this modification, Policy LWH6 will meet the basic conditions by having regard to the NPPF, adding local detail to, and being in general conformity with the strategic policy of the development plan referred to above and helping to achieve sustainable development.

It would also be useful to ‘future-proof’ Annex 5 of the Plan which refers to designated heritage assets. A modification is made to this effect.

- **Amend the second paragraph of Policy LWH6 to read:**

“Weight should be given to this list in planning decision-making and development proposals should protect or enhance these non-designated heritage assets. Proposals for any works that would cause harm to a non-designated heritage asset must be supported by an appropriate analysis of the significance of the asset to enable a balanced judgment to be made having regard to the scale of any harm or loss and the significance of the heritage asset.”

- **Amend the last paragraph on page 1 of Appendix 4 to read:**

“So following the local Index list, this Appendix includes a further list of buildings, structures, monuments, sites, places, areas or landscapes of local importance as specified in Policy LWH6. We anticipate this list will be

reviewed from time to time by the local community as part of its work with the local planning authority or as part of a future review of the Neighbourhood Plan.”

- **Remove the duplication from Appendix 4 from the bottom of page 10 of the Appendix onwards [thereby retaining the section with the areas identified on map insets]**
- **Revise the maps for areas 7 and 8 to make the boundaries more precise and ‘readable’ on the ground [this work should be carried out in conjunction with the local planning authority and not result in larger areas which would require further consultation to be carried out]**
- **Add a sentence to Annex 5 that reads: “Up to date information about designated heritage assets should always be sought from Historic England or another reliable source.”**

Flood Risk

Policy LWH7 – Protection of dwellings against Future Flooding and Climate Change seeks to ensure that new development takes into account the history of flooding in the area and proposes appropriate measures.

The NPPF is clear that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk.⁶⁴ It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.⁶⁵

The NPPF continues that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).⁶⁶ Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.⁶⁷

One of the strategic objectives of the JCS is to meet the challenges of climate change and it specifically refers to flooding. JCS Policy SD3 refers to sustainable design and construction including the need for water efficiency and taking account of water quality. JCS Policy INF2 refers to flood risk management.

Policy LWH7 is a detailed policy which sets out a number of criteria for new development.

⁶⁴ NPPF para 157

⁶⁵ Ibid

⁶⁶ Ibid para 165

⁶⁷ Ibid

CBC's Flood Risk Officer and the LLFA have made a number of detailed comments. In relation to criterion a) there is uncertainty about how the detailed and technical figures cited have come about. The Flood Risk Officer advises that the requested design rainfall scenarios should not be attached to a return period/probability as rainfall depths are likely to differ from industry approved hydrological guidance and the scaling factors require greater justification. The latest guidance, I understand, is a 40% increase for rainfall, but as this is guidance this may well change over time.

The Lead Local Flood Authority has also raised similar issues pointing out that the LLFA takes guidance for design storm events from the Flood Estimation Handbook indicating this is considered the industry standard for these matters, and Environment Agency guidance on climate change allowances.

Although the Plan states that the community has undertaken its own work to develop locally specific information, no detailed information has been submitted to justify the stance of this criterion and as the figures are likely to change over time, criterion a) should be deleted.

Turning now to criterion b), with some changes to help with the practical application of this policy, this criterion can be retained albeit in a different format.

Criterion c) is acceptable.

The Parish Council has suggested some amendments to criteria d) and e) which I incorporate in the interests of further precision.

The final criterion f) is modified to take account of the comments received from the Flood Risk Officer.

The Parish Council has put forward some amendments to paragraphs 185, 187, 188, 189 and 190 of the supporting text. Bearing in mind the representations referred to above, I have recommended some further changes to the supporting text in the interests of clarity.

With these modifications, Policy LWH7 will meet the basic conditions by having regard to national policy, being in general conformity with the JCS and helping to achieve sustainable development.

▪ **Amend Policy LWH7 to read:**

“Proposals for new development must have regard to the following *criteria* on specific local flood risk matters:

- a) *Floodable* open land *should* be preserved between Church Road and the A46 along both Hatherley Brook and Moorend Stream to be able to hold back sufficient flood water.**

- b) Any development on the scarp of Leckhampton Hill or on the land below the scarp must not divert water flows in a way that creates an additional flood risk to other residential areas. This includes diverting springs and underground water flow on the Leckhampton Fields as well as surface flow.
 - c) The use of permeable materials on external surfaces and the installation of water butts *should be secured where appropriate to the type and scale of development.*
 - d) New development should *take every available opportunity to incorporate tree planting. Tree planting would be particularly supported* in Warden Hill.
 - e) Developer contributions for tree planting off site, *for advice and guidance to householders on improving flood resilience and for natural flood management schemes,* would be supported.”
- Amend paragraph 185 on page 50 to read:

“There are four main catchments on the scarp of Leckhampton Hill. *The largest feeds into Hatherley Brook.* To the east of this are two smaller catchments, one above Leckhampton Village and the other above Old Bath Road from run-off flows into Moorend Stream and thence into Hatherley Brook. Further to the east there are catchments below Hartley Hill from which the runoff flows into the River Chelt. To the west of the Hatherley Brook catchment there is a smaller catchment from which runoff flows into a stream at Brizen Farm. This catchment played a large part in flooding Warden Hill in July 2007. *2011-installed flood defences along the A46 are designed to protect properties should flows overtop the A46.* The part of this catchment west of Farm Lane is now the site of the new development of 377 houses being built by Redrow. This development will alter the runoff in future storms.”
 - Amend paragraph 187 to read:

“Hatherley Brook overflows onto area land at the corner of Farm Lane and Church Road and onto the land east of the brook in the Local Green Space. It also overflows Kidnappers Lane and along the course of the brook across *consented housing site* located to the east of the A46. The brook has a gully with a depth of about 2.5 metres over most of its course between Church Road and the A46 and a width of about 50 metres, *providing significant storage volume.* The floodwater flow... “ [remainder of paragraph retained unchanged]
 - Replace existing paragraphs 188, 189 and 190 with two new paragraphs that read:

“*Significant rainfall occurs during major storm events, often onto already saturated ground above impermeable lias clay across the area. New*

development proposals should consider the overall wider catchment and mitigation measures such as balancing ponds should be designed with due consideration given to pre-event saturated ground and successive rainfall events. Any reprofiling of land to facilitate development should be undertaken carefully to avoid impacts on existing development, particularly to the west of the A46.

Local community knowledge is not scientific in nature but does provide first-hand information about what has happened previously in storm events in relation to run-off from Leckhampton Hill and from Warden Hill into and across the Neighbourhood Area. This can sometimes confound the models within Flood Risk Assessments and, through dialogue with the local community, local experience should be taken into account in the preparation of mitigation strategies in support of new development."

Monitoring and Review

This section indicates that the Plan will be reviewed regularly and I welcome this even though monitoring and review of neighbourhood plans is not currently mandatory.

Annexes and Appendices

There are six annexes and four appendices. I have referred to these as relevant and appropriate throughout this report. Any modifications have been incorporated at the relevant places in my report.

7.0 Conclusions and recommendations

I am satisfied that the Leckhampton with Warden Hill Neighbourhood Development Plan, subject to the modifications I have recommended, meets the basic conditions and the other statutory requirements outlined earlier in this report.

I am therefore pleased to recommend to Cheltenham Borough Council that, subject to the modifications proposed in this report, the Leckhampton with Warden Hill Neighbourhood Development Plan can proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. The boundaries of the Parish were altered in 2018. This means that the Plan covers a smaller area than the now well established Parish boundaries. I consider the referendum should cover the current Parish area to allow all residents of the Parish to vote in the referendum not least in the interests of community spirit and cohesion and to reinforce a sense of local community. I note that the Parish Council has requested me to include the extended area in any referendum.

I therefore consider that the Leckhampton with Warden Hill Neighbourhood Development Plan should proceed to a referendum based on the current Leckhampton with Warden Hill Parish boundary.

Ann Skippers MRTPI
Ann Skippers Planning
28 November 2025

Appendix 1 List of key documents specific to this examination

Leckhampton with Warden Hill Neighbourhood Plan Regulation 15 Submission June 2023 including six Annexes and four Appendices

Basic Conditions Statement June 2023 (updated 4 January 2024)

Consultation Report June 2023

Determination Statement - Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) November 2022 (CBC) including the Request for Screening Opinion prepared by Andrea Pellegram Ltd and dated 13 June 2022

Screening Opinion on the need for Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Statement of Reasons November 2022 (CBC)

Saved Policies of the Cheltenham Borough Local Plan Second Review adopted July 2006

Joint Core Strategy Gloucester, Cheltenham and Tewkesbury 2011 – 2031 adopted December 2017

Cheltenham Plan adopted July 2020

Index of Buildings of Local Interest SPD adopted 28 June 2007 (CBC)

Cotswolds National Landscape Management Plan 2025 – 2030 (Cotswolds NL Management Board)

List ends

Annex 1 Amendments Proposed by the Parish Council

Paragraph and page number	Proposed amendment [new text shown in bold italics]
Table 1, page 6	<p>Add a new social objective to the row on Policy LWH7 and revise the existing environmental objective for Policy LWH7 that read:</p> <p>New social objective: <i>“Less flood damage improves domestic insurability and improves mental wellbeing.”</i></p> <p>Revised environmental objective: “Improvements in local flood avoidance and resilience measures will contribute to environmental benefits through the avoidance of flooding. <i>Sustainable/natural flood risk management schemes can also contribute to biodiversity/habitat under environmental objectives.</i>”</p>
Para 59, page 13	<p>Update paragraph 59 to read:</p> <p>“Significant housing allocations have been made within the Neighbourhood Area. Cheltenham Local Plan site allocation MD4 <i>has recently secured detailed planning consent for 350 homes (application reference APP/B1605/W/ 22/33091563)</i>. Through this, the Neighbourhood Area is making a contribution towards meeting housing needs across Cheltenham...” [remainder of paragraph retained unchanged]</p>
Table 2, page 27	<p>Amend the third and fourth columns for Leckhampton Village Hall to read:</p> <p>“Multi-use venue which is used by 11 local clubs, available for hire, <i>attracting 25,000 visits per annum</i>. Parking off street provided.”</p> <p>“Retain in community use. <i>Update facilities to promote accessibility and safe use.</i>”</p>
Para 148, page 34	<p>Add the following text to existing paragraph 148 and add a new paragraph 149:</p> <p>“Significant housing developments should directly provide key route connections. <i>Strategic priorities for the provision of sustainable transport are set out in the Adopted Joint Core Strategy (2017), which provides a strategic policy framework for transport and sustainability. JCS Strategic Objective 7, Policy SD4 (vii), Table SD4b (Ease of Movement), Policy INF1 (1 i-iii) and Policy INF4 (3) provide principles to guide the consideration of walking and cycling</i></p>

networks at a neighbourhood level or in development proposals. Cheltenham Plan policy MD4 requires pedestrian and cycle links within the allocation site and to key centres.”

“The Joint Core Strategy and Cheltenham Plan provide a strategic policy context for the identification of local priorities for improvements to movement networks, particularly through walking and cycling within the neighbourhood plan area. The neighbourhood plan objective is to set out local priorities to improve the environment for walking and cycling to access key local services. It identifies the location of key local destinations for existing and new residents and identifies routes local people use. It is important that these are given appropriate regard in decision making and investment programmes.”

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Appendix 4 - Officer’s recommendations in response to Leckhampton with Warden Hill Parish Council Comments and Requested Amendments Post-Examiner’s Report on the Leckhampton with Warden Hill Neighbourhood Plan

Following receipt of the Examiner’s Report on 28 November 2025, the Examiner has recommended a series of modifications to the Leckhampton with Warden Hill Neighbourhood Plan (the Plan). The Parish Council has subsequently submitted comments and requested amendments in relation to the Examiner’s findings on the following policies:

- **LHW3 – Managing and Enhancing Local Green Space**
- **LWH4 – Green Infrastructure**
- **LWH5 – Conserving and Enhancing Valued Landscape**

These comments and requested amendments follow a virtual Microsoft Teams meeting between representatives of the Parish Council and Council Officers. During the meeting, Officers provided advice on the statutory role of the Examiner and how the Council is required to consider the Examiner’s recommendations in order to comply with the Neighbourhood Planning (General) Regulations 2012 and the Basic Conditions that neighbourhood plans must meet.

The table below presents:

1. The relevant extract from the final Examiner’s Report,
2. The Parish Council’s comments and requested amendments, and
3. Officer recommendations, informed by both Planning Policy and Legal Services.

In reviewing the Parish Council’s submissions, Officers have considered the following options:

- **Accept the Examiner’s recommended modifications**
- **Accept the amendments requested by the Parish Council** where doing so would not conflict with the Examiner’s recommended modifications, the basic conditions, or wider legal or policy requirements.

Abbreviations used in the following table:

LHWHPIC	Leckhampton & Warden Hill Parish Council
CBC	Cheltenham Borough Council
NDP	Neighbourhood development Plan
CP	Cheltenham Plan
LGS	Local Green Space
LCA	Landscape Character Area
Cotswolds NL	Cotswolds National Landscape

Examiner's Report	Leckhampton & Warden Hill Parish Council Comment and Requested Amendments	CBC Officer Recommendations
LWH3 – Manging and Enhancing Local Green Space		
<p>The desire to produce a management plan for the LGS is clearly of great importance to the local community. It is, however, in my view, an aspiration rather than a development and use of land policy. I see this mechanism as being the more appropriate way for managing the future of this particular LGS given it is designated through the CP. For that reason I recommend the policy and supporting text be deleted from the Plan, but the desire to produce a management plan in association with partners (which should include the local planning authority and any landowners) and look at this issue comprehensively with relevant partners and against applicable policy, could be included in the Plan as a community aspiration if so desired.</p>	<p>To include text in the final version of the NDP relating to the importance of the LGS locally leading to the aspiration of the production of the management plan.</p> <p>Insert text saved from the supporting text into 'Profile of the Neighbourhood Area after para 36, as follows:</p> <p>“The designation of Local Green Space in the Adopted Cheltenham Plan 2020 established strong protection against development in a defined area of Leckhampton Fields, shown on Figure 11. Policy for managing development in Local Green Space should be consistent with those for Green Belts.</p> <p>The local community within the Neighbourhood Area want to manage and enhance the Leckhampton Fields Local Green Space to promote its use and importance as a resource for green infrastructure and as an important component of locally valued landscape.</p> <p>Leckhampton with Warden Hill Parish Council will work with local volunteer groups to develop a management plan to manage and improve the Leckhampton Fields Local Green Space to achieve clear objectives, including to:</p> <p>Protect the Local Green Space from inappropriate development. Promote recreational use of the Local Green Space. Promote biodiversity within the Local Green Space. Promote pedestrian access to and within and across the Local Green Space. Improve understanding of the history, features and value of the Local Green Space.”</p>	<p>Officer's recommendation: Accept the Examiner's recommended modifications.</p> <p>It is considered that retaining supporting text when the policy is recommended to be deleted would serve no purpose to the NDP, and subsequent weight to decision making. The assessment by the Independent Examiner concluded that this element of the NDP did not meet the basic conditions or other legal requirements.</p> <p>Officers are supportive of LHWHPC aspiration to produce a management plan for the LGS. However, the Examiner regards this as an aspiration rather than a development and use of land policy. Officers concur that setting this out within the NDP would not be the appropriate mechanism to facilitate the management plan.</p> <p>Should LHWHPC progress to prepare a management plan, then once concluded this could be capable of being a material consideration in the context of any future planning application. The relevant policy which would apply and have full weight is CP Policy GI1: Local Green Space.</p>

LWH4 – Green Infrastructure

<p>In relation to Areas 6 and 17, both form part of the strategic site of MD4 and will be planned as part of the comprehensive development area. This is not to say these areas do not make important contributions to the GI network, but that, given the stage of development of this strategic site, they may be better incorporated into any “list” at a later stage once they can be reassessed.</p>	<p>The proposed amendments submitted by LWWHPC to sites 6 and 17 in advance of the Examination do reflect the post-development position based on consented plans agreed through discharge of conditions and now being implemented on site. On this basis, can the sites be retained?</p> <p>To be deleted and reviewed after completion of development.</p>	<p>Officer’s recommendation: Accept the Examiner’s recommended modifications.</p>
<p>With regard to Area 9, I understand planning permission has now been granted for 30 dwellings. The Appendix as proposed to be amended by the Parish Council recognises that permission has been granted, but still seeks the area to be protected from any other development. This is not an appropriate mechanism to do this and to include the area within the “list” could prevent the proper planning of what is now in effect a committed development site.</p>	<p>9 – It was not the intention to prevent the proper planning of a committed development site. Can the site be retained with the deletion of the words “Should this development not take place, this area should be protected from harm by any other development.”? (these were additional words proposed by LWWHPC prior to the Examination and can be removed).</p> <p>LWWHPC requests this site is retained. The Examination Report does not recognise that the local interest in designating this site as a component the green infrastructure network rests on its historic uses as traditional orchard and market gardens.</p> <p>These uses have been identified as part of the tapestry of land uses in the area that provide a special character. The accumulation of these character elements along with built development and open views to the Cotswold National Landscape, have led to the area being described as a Valued Landscape. The Examination Report has also contented that Valued Landscape in the area is not defined and so cannot be regarded.</p> <p>The Neighbourhood Plan contends that all development sites have a role to play in ensuring that, as much as possible, elements of special character are retained to sustain the Valued Landscape in the area.</p>	<p>Officer’s recommendation: Accept the Examiner’s recommended modifications.</p> <p>Officers acknowledge the Parish Council’s comments about what was intended. Even if parts of this area make a contribution to the green infrastructure network, this area is now effect a committed development site (ref. 21/02750/FUL). There is ongoing engagement with the applicant (New Dawn Homes Ltd) who are expected to build out the scheme (ref. 25/01031/CONDIT which has a resolution to permit subject to Section 106).</p>

<p>With regard to Area 13, the justification for this area's inclusion appears to relate to detail over what development on the site should or should not do rather than any reasons for its importance as part of any GI network.</p>	<p>13 -The details of how the site makes a contribution to the Green Infrastructure Network is set out in the site entry. The additional words proposed by LWWHPC prior to examination resulted from discussion and agreement with the site promoter and as such provides a framework for safeguarding important green infrastructure whilst supporting development in accordance with clear principles. Can this site be retained?</p> <p>LWWHPC requests that this site is retained for the same reasons as outlined above in relation to Area 9. In this case, specific discussion took place with the developers to agree a position with a more specific area of land identified for green infrastructure provision. It is not clear to LWWHPC why this site cannot be retained to ensure that green infrastructure objectives are met.</p>	<p>Officer's recommendation: Accept the Examiner's recommended modifications.</p> <p>The supporting text for area 13 does not support the area's role as being part of the green infrastructure network.</p>
<p>In addition, Area 8 is the school site. This should be reassessed at a later date once the development has been completed.</p>	<p>8 – The school development has been completed and therefore the post-development position is clear and consistent with the site entry. On this basis, can the site be retained?</p> <p>As previously noted, the school development has been completed. Wording of the entry would need to be edited reflect the post-development completed and available Green Infrastructure components within the site.</p>	<p>Officer's recommendation: Accept the Examiner's recommended modifications.</p> <p>The development is complete policy LWH4 will have no applicability to this area.</p>
<p>LWH5 – Conserving and Enhancing Valued Landscape</p>		
<p>Firstly, it is not clear to me whether the Plan seeks to designate an area as valued landscape. The use of the phrase as a proper noun suggests a designation to me. However, there is nothing in the Plan to suggest it seeks to designate a specifically identified area and no map identifies it as such and the policy does not cross refer to any map.</p> <p>Paragraph 168 of the supporting text also helps to</p>	<p>The neighbourhood plan does not seek to designate a specific area of Valued Landscape because it is contended that it already exists in the area, defined through strategic plans and decisions by Inspectors and the Secretary of State that though undesignated that the area is Valued Landscape under the NPPF. The Statement on Valued Landscape in Appendix 3 of the Plan provides a history of how this has come about. The LCA also provides a planning policy context and</p>	<p>Officer's recommendation: Accept the Examiner's recommended modifications.</p>

<p>reinforce my suspicion that no specific area is intended for designation by indicating that Figure 13 identifies the broad locational applicability of the recommendations. The recommendations referred to are found in the LCA; these are reproduced in the Plan as Table 3. Paragraph 168 then explains that Policy LWH5 sets policy to implement these recommendations where appropriate.</p>	<p>basis for the existence of Valued Landscape.</p>	
<p>Nevertheless, plainly the LCA's Study Area is more than a starting point. The LCA was undertaken in 2022 and predates an appeal decision on land south of A46 Shurdington Road that was determined by the Secretary of State on 27 February 2024.</p> <p>With the passage of time, the LCA is based on a Study Area which, in my view, needs reviewing and updating as a result of this and other more recent appeal decisions.</p>	<p>A specific feature of Valued Landscape in this area is the complex relationship between open land, market garden land, historical development and new development, acting together to form a valued landscape and setting for the national landscape with which it has a strong visual relationship. This has been noted repeatedly by local plan and appeal inspectors and was reflected in allocation policies including the allocation of land south of Shurdington Road which the LCA took into account.</p> <p>New development does not remove Valued Landscape considerations. The design of development should be undertaken with Valued Landscape principles in mind. CBC is asked to consider the point that the LCA Study is not compromised by the Miller permission as the development was known about. Also, the concept of Valued Landscape in this area is not founded on land entirely free from development but allows for new development to contribute to the character features which support the valued landscape, as you walk through the area and as you view it from the National Landscape. This point was made previously.</p> <p>If CBC does agree with this point, then the LCA would not be out of date and so wholesale deletion of all references to the study and to the very existence of Valued Landscape would not be remotely necessary.</p>	<p>Officer's recommendation: N/A. However, officers response to comment by LHWHP as follows.</p> <p>Officers acknowledge that the Miller Homes development, Land at Shurdington Road, was indicated within the LCA Study Report but note that at the time the site did not have formal planning permission and that the report was commissioned in 2022. The NPPF states that all policies should be underpinned by up-to-date evidence. The Examiner has set out that the evidence needs reviewing.</p> <p>The Parish Council may want to note that a Landscape Character Assessment, and Landscape & Visual Impact Assessment will be undertaken as part of the evidence base for the Strategic and Local Plan (SLP), and this could feature in the future review of any Neighbourhood Development Plan</p>

<p>Therefore there can be no designation of land as a valued landscape until a review of the Study Area can take place. Those references to “Valued Landscape” should therefore be deleted from the Plan in the interests of clarity.</p>	<p>If the above is accepted – Valued Landscape already exists + New development sits within and can contribute to the maintenance of this specific Valued Landscape – then there is no need to update the LCA or have it reflected in each new planning permission/development as it occurs. Does CBC agree with the proposition that Valued Landscape exists within the Leckhampton with Warden Hill Neighbourhood Area?</p> <p>Does CBC agree that the broad extent of Valued Landscape is known, even whilst acknowledging that it is not designated in strategic policies with a boundary shown on a map?</p> <p>If so, there can be no objection to the principle of referring to Valued Landscape in the NDP. LWWHPC requests that it should be able to refer to Valued Landscape in the NDP given its importance as a character feature in the area. If accepted, specific use of the phrase can be addressed on a case-by-case basis.</p>	<p>Officer’s recommendation: Accept the Examiner’s recommended modifications.</p> <p>Officers acknowledge that the NPPF (2023) refers to valued landscape, but this is not defined. The Examiner is clear that there can be no designation of land as a valued landscape until a review of the Study Area can take place. Officers are of the view that there is no reason to deviate from the Examiner’s recommendation.</p>
<p>Secondly, given that the LCA would benefit from a further update which has simply resulted from the passage of time, its recommendations must be viewed with some degree of caution.</p> <p>This is particularly the case given the LCA took a broad brush approach treating the Study Area as a single entity and concluded that the area is “highly valued”. It is therefore difficult for me to judge which recommendations remain wholly valid or whether different ones would now come to the fore.</p>	<p>If the above is accepted – that there is no need to update the LCA for the reasons given - then there is no need for a site-by-site reassessment of the study area and, at 3 years old, the assessment would not be out of date. The concept and principle would endure beyond each individual decision.</p>	<p>As per Officers’ earlier comments within this document, the NPPF states that all policies should be underpinned by up-to-date evidence. The Examiner has set out that the evidence needs reviewing.</p>

<p>So the question now is whether the policy is appropriate to retain in the Plan given that I have found that the LCA on which it largely relies needs review. Regrettably, I have concluded that the policy so largely relies on the LCA work, it would not be possible to do this through modification and it would not be appropriate for me to rewrite it and much of the chapter.</p> <p>In reaching this conclusion, I am mindful that there are a number of policies already in place that seek to conserve and enhance landscape and ensure due consideration is given in the determination of any planning applications. The NPPF states that the natural and local environment should be enhanced including through the protection of valued landscapes and sites of biodiversity or ecological value and soils in a manner commensurate with their statutory status or identified quality in the development plan and through recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems services.</p>	<p>This would not be required if the above is accepted.</p>	<p>See above comments</p>
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<p>Nothing in my approach should be taken as indicating that some of land in the LCA Study Area is not likely to be worthy of being a valued landscape. In fact, I find the contrary to be the case.</p> <p>The LCA shows that the area in general scores highly against the criteria in the widely used Landscape Institute TGN 02-21 guidance on assessing landscape value outside national designations. The LCA concluded that the area is “highly valued”.</p> <p>In addition, the Inspector in the aforementioned appeal accepted that the land covered by the LGS was valued landscape at the time of the appeal.</p> <p>Furthermore, the representation from the Cotswolds NL Team clearly regards the general area as falling within the setting of the NL and robustly supports Policy LWH5.</p>	<p>If the above is accepted, then some land within the plan area is Valued Landscape and not merely worthy of being a valued landscape.</p>	<p>See above comments</p>
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<p>However, this does not alter my judgment that this chapter and Policy LWH5 cannot be retained in the Plan at this point in time without further work to update and support such a policy. In order to meet the basic conditions in respect of having regard to national policy and guidance insofar as evidence should be up to date and appropriate reflecting and responding to both the planning context and the characteristics of the area, I recommend Policy LWH5 and its supporting text and all references to “Valued Landscape” are deleted from the Plan.</p>	<p>Deletion of policy LWH5 would not be required if the alternative view of the facts set out above is accepted.</p> <p>However, if the alternative view of the facts is not accepted, then it is suggested that the Policy LWH5 could still be retained with the removal of references to specific locations in the area (R1 to R18) in Table 3 and Figure 13. Without the reference to specific locations directed or implied (apart from R9 reference to Lotts Meadow within the LGS, which could be edited), the policy would seek to apply general principles within Valued Landscape settings and it would be for applicants to consider and act on this as may be relevant to the specific site.</p> <p>The LCA study would be able to remain as a supporting document to the plan but would not be directly linked in policy terms. LWWHPC suggested an amended approach so that Table 3 could be retained with changes as suggested.</p> <p>If the policy could be retained, then it could be set out without reference to valued landscape (and with only a few amendments), as follows:</p> <p>“POLICY LWH5 – Conserving and Enhancing Local Landscape Character In conjunction with LWH4 of this Neighbourhood Plan, where appropriate, new developments within the Neighbourhood Plan Area should satisfy the following principles to: Preserve essential Landscape Character features within the Neighbourhood Area, including layout of public roads, rights of way, the field pattern, vegetated character of highways. Maintain and enhance the contribution of Landscape within the Neighbourhood Area to the setting of the Cotswold National Landscape.</p>	<p>Officer’s recommendation: Accept the Examiner’s recommended modifications.</p> <p>Officers consider that this would in effect be introducing a new policy which has not been publicly consulted upon in accordance Neighbourhood Planning Regulations and has not been assessed by an Independent Examiner as to whether or not this policy now meets the basic condition or other legal requirements.</p> <p>The Council will continue to work collaboratively with the Parish Council in any future review of the NDP in light of the evidence base for the SLP.</p>
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Ensure new development does not significantly reduce the visual link between the Local Green Space and the Cotswold Escarpment.

Incorporate landscape and ecological improvement proposals to protect, maintain and enhance the landscape and wildlife value of watercourses, hedgerows and trees and existing green corridor connections between Local Green Space and surrounding environs.

Focus on opportunities for biodiversity net gain from new development on improvements and extensions to priority habitats including orchards and semi-improved grasslands

Provide a sufficient level of green infrastructure to maintain the strategic role of green infrastructure in providing a green setting for the Cotswold National Landscape.

Complement management principles for the Leckhampton Local Green Space in the provision of external landscaping, planting and biodiversity enhancement, where relevant.

Consider opportunities for provision of educational signage and interpretation to improve understanding about the history and character of the Neighbourhood Area.”

Delete the section on “Valued Landscape” and Policy LWH5	This would not be necessary if the above is accepted.	See above comments
Consequential amendments will be needed to delete the reference to Policy IWH5 in Table 1 on page 6; replace the words “Valued Landscape and a..” in paragraph 36 on page 10 with “...the...”; delete paragraphs 78 and 79 on page 16 in their entireties [a new paragraph setting out the factual context of landscape in the Plan are can be inserted with the agreement of the local planning authority]; change the words “Valued Landscape” in objective 3 on page 18 and paragraph 156 on page 38 to “landscape”; change the words “...strategic Valued Landscape” in paragraph 157 on page 38 to “landscape”	<p>If the above is accepted, then text references could be reviewed between LWWHPC and CBC to ensure that references to Valued Landscape are consistent with the approach set out.</p> <p>In the worst case where none of these points set out above are accepted, it is suggested that some references to Valued Landscape need to be retained in the NDP, particularly in relation to Inspector and Secretary of State decisions referring to Valued Landscape as this is clearly an important consideration to guide decisions on new development proposals. The specific approach to where this could be done could be agreed following the Examination with CBC officers if that is acceptable.</p>	<p>Officer’s recommendation: Accept the Examiner’s recommended modifications.</p> <p>The Examiner is clear as to why they consider references to Valued Landscape should be deleted.</p>
Remove Appendix 3 from the Plan	This would not be necessary if the above is accepted.	See above comments

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Cheltenham Borough Council

Cabinet – 24 February 2026

E-Bike and Battery Policy

Accountable member:

Cabinet Member for Housing and Customer Services, Councillor Flo Clucas

Accountable officer:

Director of Housing - Customer and Community Services, Caroline Walker

Ward(s) affected:

All

Key Decision: No

Executive summary:

The purpose of this policy sets out how Cheltenham Borough Council manages the safe use, storage and charging of electric bicycles (e-bikes) and their lithium-ion batteries within properties by Cheltenham Borough Council Housing Services, reducing fire risk and protecting tenants, staff, and property.

Recommendations: That Cabinet:

- 1. approves the E-Bike and Battery Policy**
-

1. Implications

1.1 Financial, Property and Asset implications

The introduction of this policy has no financial, property or asset implications.

Signed off by: Jon Whitlock, Head of Finance and Assets

jon.whitlock@cheltenham.gov.uk.

1.2 Legal implications

The introduction of this policy has no legal implications

Signed off by: Alison McKane, Interim Deputy Monitoring Officer

alison.mckane@cheltenham.gov.uk

1.3 Environmental and climate change implications

The introduction of this policy has no environmental or climate change implications

Signed off by: Maizy McCann, Climate Officer

maizy.mccann@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Quality homes, safe and strong communities

1.5 Equality, Diversity and Inclusion Implications

Please see Appendix 2.

1.6 Performance management – monitoring and review

Not applicable

2 Background

2.1 Cheltenham Borough Council Housing Services over the last 2 years have had 4 property fires that have been related to the charging of e-batteries in tenant's home. These fires have caused considerable damage to the property and the loss of tenant's belongings.

2.2 This new policy, alongside communications campaign will help tenants understand how to charge/store appliances and the potential risks to them and their homes.

3 Reasons for recommendations

3.1 To provide clear guidance on the safe storage and charging of appliances and

the potential risks within tenants' homes.

4 Alternative options considered

Not applicable

5 Consultation and feedback

5.1 Tenant Panel were consulted on 16 January 2026, positive feedback received and no changes to the policy proposed by the panel

5.2 This policy was considered by the Cabinet Housing Committee on the 21 January 2026 and was recommended to Cabinet for approval.

6 Key risks

6.1 Please see Appendix 1.

Report author:

Caroline Walker, Director of Housing - Customer and Community Services,
Caroline.Walker@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment – Screening
- iii. E-bike and Battery Policy
- iv. Tenant Friendly Summary of E-bike and Battery Policy
- v. NFCC Fire Safety Guidance for E-bikes and E-scooters
- vi. UK Government Lithium-ion for Battery Safety Guidelines

Background information:

See attached policy

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
CH4	Housing Properties Health & Safety - If we do not manage health and safety management of our housing properties, then we may be putting tenant at risk of serious injury or death.	Claire Hughes	5	3	15	Reduce	<ul style="list-style-type: none"> - Clear health & safety procedures in place with evidence these are followed. - Regular independent assurance that health and safety is being management effectively. - Effective oversight of health and safety performance by senior officers, Cabinet and Housing Cabinet committee. 	Claire Hughes	01/04/2026

Appendix 2: Equality Impact Assessment (Screening)

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

a. Person responsible for this EqIA	
Officer responsible: Justine Skitt	Service Area: Housing Services
Title: Tenancy Management Team Leader	Date of assessment: 30 th December 2025
Signature: <i>Justine Skitt</i>	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
E-bike and Battery Policy	
Is this new or existing?	New or proposed
Please specify reason for change or development of policy, function, strategy, service change or project	
The purpose of this policy sets out how Cheltenham Borough Council manages the safe use, storage and charging of electric bicycles (e-bikes) and their lithium-ion batteries within properties by Cheltenham Borough Council Housing Services, reducing fire risk and protecting tenants, staff, and property	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	To ensure that all residents use e-bike and battery correctly to reduce risk of self harm and property harm.
Objectives:	To ensure residents understand their responsibility when storing/charging of

	e-bikes and batteries
Outcomes:	Cheltenham Borough Council tenants to understand their rights as a tenant.
Benefits:	To reduce the potential risk to person or property.

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:	
Policy will provide details to all residents of their responsibility when using/storing/charging e-bike and batteries	

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

f. Identify next steps as appropriate	
Stage Two required	Yes
Owner of Stage Two assessment	Justine Skitt
Completion date for Stage Two assessment	30th December 2025

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

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

a. Research and evidence

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

Best Practice
n/a

b. Consultation

Has any consultation be conducted?	Yes
Describe the consultation or engagement you have conducted or are intending to conduct.	
Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.	
If no consultation or engagement is planned, please explain why.	
Consultation with tenant panel and Cabinet Housing Committee	

3. Assessment

a. Assessment of impacts

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For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Neutral		
	Younger People (16-25)	Neutral		
	Children (0-16)	Neutral		
DISABILITY A definition of disability under the Equality Act 2010 is available here . <i>See also carer responsibilities under other considerations.</i>	Physical disability	Neutral		
	Sensory Impairment (sight, hearing)	Neutral		
	Mental health	Neutral		
	Learning Disability	Neutral		
GENDER REASSIGNMENT		Neutral		
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral		
	Men	Neutral		
	Lesbians	Neutral		
	Gay Men	Neutral		

PREGNANCY & MATERNITY	Women	Neutral		
RACE* Further information on the breakdown below each of these headings, is available here . For example Asian, includes Chinese, Pakistani and Indian etc	White	Neutral		
	Mixed or multiple ethnic groups	Neutral		
	Asian	Neutral		
	African	Neutral		
	Caribbean or Black	Neutral		
		Neutral		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral		
SEX (GENDER)	Men	Neutral		
	Women	Neutral		
	Trans Men	Neutral		
	Trans Women	Neutral		
SEXUAL ORIENTATION	Heterosexual	Neutral		
	Lesbian	Neutral		

	Gay	Neutral		
	Bisexual/Pansexual	Neutral		
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Neutral		
Rurality i.e. access to services; transport; education; employment; broadband		Neutral		
Other (e.g. caring responsibilities)		Neutral		

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

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

4. Outcomes, Action and Public Reporting Page 210

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

Action	Target completion date	Lead Officer
None		

b. Public reporting

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

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

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

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change

Cheltenham Borough Council policy

E-Bike and Battery Safety Policy

Version control

Document name: E-Bike and Battery Safety Policy

Version: 1.0

Responsible officer

- Justine Skitt, Tenancy Management Team Leader

Approved by: Housing Committee

Next review date: January 2029 (or change to relevant legislation)

Retention period:

Revision history

Revision date	Version	Description
date		

Consultees

Internal

- Caroline Walker, Director of Housing, Customer Services & Communities

External

- Tenants

Distribution

Contents

1. Introduction and purpose of the policy.
2. Aims and scope of the policy
3. Policy Statement.
4. Key Requirements
 - Storage
 - Charging
 - Battery Safety
5. Fire Risk Management.
6. Enforcement Procedures.
 - Monitoring
 - Action on a Breach
 - Emergency Situations
 - Record Keeping
7. Tenant Guidance
8. Review
9. References

Introduction and purpose of the policy

The purpose of this policy sets out how Cheltenham Borough Council manages the safe use, storage and charging of electric bicycles (e-bikes) and their lithium-ion batteries within properties by Cheltenham Borough Council Housing Services, reducing fire risk and protecting tenants, staff, and property.

Aims and scope of the policy

This policy applies to:

- All tenants, leaseholders and residents in properties managed by Cheltenham Borough Council Housing Services.
- All communal areas, dwellings managed by Cheltenham Borough Council Housing Services and storage facilities.

Policy Statement

E-bikes and their batteries present a potential fire hazard if not used and maintained correctly. Cheltenham Borough Council is committed to:

- Complying with the Regulatory Reform (Fire Safety Order 2005, Health and Safety at Work Act 1974 and relevant housing regulations.
- Implementing measures to minimise risks associated with lithium-ion batteries.

Key Requirements

Storage

- E-bikes must not be stored in communal areas, escape routes, or near fire exits.
- Tenants may store e-bikes in their own property if space allows and does not obstruct exits.

Charging

- Charging in communal areas is strictly prohibited.
- Tenants must:
 - Use manufacturer- approved charges only.
 - Charge batteries while awake, never overnight.
 - Keep batteries away from flammable materials during charging.
 - Avoid charging near doors or escape routes.

Battery Safety

- Inspect batteries regularly for damage, swelling or overheating.
- Do not use damaged or non-original batteries.
- Report any concerns immediately to Cheltenham Borough Council.

Enforcement Procedures

To ensure compliance with this policy:

Monitoring

- Regular inspections of communal areas will be carried out by Cheltenham Borough Council Housing Services.
- Fire risk assessments will include checks for e-bike storage and charging.

Action on Breach

- **First breach** – Written warning issued to tenant with guidance on safe practices.
- **Second breach** – Formal notice under tenancy agreement, removal of e-bike from communal areas at tenants' cost.
- **Persistent or serious breach:**
 - Possible tenancy enforcement action (e.g. breach of tenancy conditions).
 - Referral to fire safety authorities if risk is severe.

Emergency Situations

- If an e-bike battery or bike poses an immediate fire risk, Cheltenham Borough Council reserves the right to remove the item without prior notice for safety reasons.

Record keeping

- All breaches and actions taken will be logged in their tenancy management system.

Tenant Guidance

Cheltenham Borough Council will provide:

- Safety leaflets on e-bike battery use.
- Links to official guidance from the NFCC and OPSS.

Complaint and Appeals

If a tenant/applicant is not happy with any element of CBC's service received, they will be able to make a formal complaint. The complaint will be dealt with in line with CBC's Complaints and Compliments policy.

Equality and Diversity

CBC is committed to the principle of equality of opportunity in the delivery of its services. CBC aims to ensure all its tenants are dealt with fairly and equitably and, where possible, taking into account the diverse nature of cultures and backgrounds.

An Equality Analysis Form has been completed in the production/review of this policy.

Monitoring and Review

The Tenancy Services Team Leader is responsible for monitoring this policy ensuring it is being correctly applied, and is also responsible for ensuring reviews of this policy are carried out.

CBC will undertake regular reviews of this policy, any procedures related to it and staff training needs, ensuring service improvements are made and implemented.



There will be an automatic review of this policy whenever there is a change of policy from the government, or change to legislation. In the absence of any other trigger, the policy will be reviewed at intervals of no more than three years.

References

- NFCC Fire Safety Guidance for E-Bikes & E- Scooters
- UK Government Lithium-ion Battery Safety Guidelines.

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E-Bike and Battery Safety – Tenant Guide

Cheltenham Borough Council wants to keep everyone safe when using electric bikes (e-bikes) and their batteries. This guide explains how to store, charge, and look after your e-bike safely.

Why is this important?

E-bikes use lithium-ion batteries, which can cause fires if damaged or charged incorrectly. Following these rules helps protect you, your neighbours, and your home.

What you need to do

Storage

- **Do not store e-bikes in communal areas** (hallways, stairwells, shared spaces) or near fire exits.
 - You can keep your e-bike inside your home **if it doesn't block doors or escape routes**.
-

Charging

- **Never charge your e-bike in communal areas.**
 - Always:
 - Use the **charger provided by the manufacturer**.
 - Charge batteries **when you are awake** – never overnight.
 - Keep the battery **away from anything that can catch fire** while charging.
 - Avoid charging near doors or escape routes.
-

Battery Safety

- Check your battery regularly for:
 - Damage
 - Swelling
 - Overheating
- **Do not use damaged batteries** or non-original replacements.

- If you notice a problem, **contact Cheltenham Borough Council immediately.**
-

Fire Safety

- If your e-bike or battery looks dangerous or could cause a fire, we may remove it straight away for safety reasons.
-

What happens if rules are broken?

- **First time:** You'll get a written warning and advice.
 - **Second time:** Formal notice and removal of the e-bike from communal areas (at your cost).
 - **Serious or repeated breaches:** We may take tenancy enforcement action or contact fire safety authorities.
-

Need help or more information?

- We'll provide safety leaflets and links to official guidance.
 - If you're unhappy with our service, you can make a formal complaint under our Complaints and Compliments policy.
-

Equality

We treat all tenants fairly and consider different needs and backgrounds.

Review

This policy will be reviewed regularly and updated if laws change.

References:

- NFCC Fire Safety Guidance for E-Bikes & E-Scooters
- UK Government Lithium-ion Battery Safety Guidelines

E-bikes and e-scooters fire safety guidance

E-bikes and e-scooters are becoming increasingly popular. Most are powered by lithium-ion batteries, which can be charged in the home. The use of these batteries in a wide range of household products is becoming increasingly common.

It is important, when charging e-bikes and e-scooters, you do so safely to avoid a risk of a fire starting and putting your families and homes at risk.

With an increased use of e-bikes and e-scooters, comes a corresponding fire safety concern associated with their charging and storage. The use of these products is expected to continue to rise. Some fire services and fire investigators have seen a rise in e-bike and e-scooter battery fires.

Currently, there is limited data relating to the number of fires, but London Fire Brigade reported 8 fires caused by e-bikes and e-scooters in 2019. This rose to twenty-four in 2020 and fifty-nine by December 2021.

On occasions, batteries can fail catastrophically, they can 'explode' and/or lead to a rapidly developing fire.

The incorrect disposal of lithium-ion batteries in general household and recycling waste can lead to significant waste fires. Prevention messaging is therefore important in supporting both FRS protection and operational staff.

Key messages

The following messages can be useful in communicating the risk and minimising the risk of fire to the public:

Charging

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- Charge batteries whilst you are awake and if a fire should occur you can respond quickly. Don't leave batteries to charge while you are asleep or away from the home.
- Always use the manufacturer approved charger for the product, and if you spot any signs of wear and tear or damage, buy an official replacement charger for your product from a reputable seller.
- Do not cover chargers or battery packs when charging, as this could lead to overheating or even a fire.
- Do not charge batteries or store your e-bike or e-scooter near combustible or flammable materials.
- Do not overcharge your battery – check the manufacturer's instructions for charge times.
- Do not overload socket outlets or use inappropriate extension leads (use uncoiled extensions and ensure the lead is suitably rated for what you are plugging in to it).
- In the event of an e-bike, e-scooter or lithium-ion battery fire – do not attempt to extinguish the fire. Get out, stay out, call 999.

Storage

- Avoid storing or charging e-bikes and e-scooters on escape routes or in communal areas of a multi occupied building. If there's a fire, it can affect people's ability to escape.
- Responsible Persons should consider the risks posed by e-bikes and e-scooters where they are charged or left in common areas such as means of escape, bike stores and mobility scooter charging rooms. They may wish to offer advice to residents on the safe use, storage and charging of these products.
- Store e-bikes and e-scooters and their batteries in a cool place. Avoid storing them in excessively hot or cold areas.
- Follow manufacturer's instructions for the storage and maintenance of lithium -ion batteries if they are not going to be used for extended periods of time.

Buying

- Buy e-bikes, e-scooters and chargers and batteries from reputable retailers.
- Many fires involve counterfeit electrical goods. Items which don't meet British or European standards pose a huge fire risk and while genuine chargers (or battery packs) may cost more, it's not worth putting your life at risk and potentially destroying your home by buying a fake charger to save a few pounds.
- If buying an e-bike conversion kit, purchase from a reputable seller and check that it complies with British or European standards. Take particular care if buying from online auction or fulfilment platforms. Also be aware that if buying separate components, you should check that they are compatible.

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- Batteries can be damaged by dropping them or crashing e-bikes or e-scooters. Where the battery is damaged, it can overheat and catch fire without warning. Check your battery regularly for any signs of damage and if you suspect it is damaged it should be replaced and should not be used or charged.
- If you need to dispose of a damaged or end of life battery, don't dispose of it in your household waste or normal recycling. These batteries, when punctured or crushed, can cause fires in bin lorries, recycling and waste centres. Your e- bike or e- scooter manufacturer may offer a recycling service. Alternatively, check with your local authority for suitable battery recycling arrangements in your area.

Enjoy and ride your e-bike or e-scooter safely and ensure you are using these products within the law. Further information can be found here <https://www.gov.uk/electric-bike-rules> and [for e-scooters](#)

Further information around lithium-ion batteries is available from NFCC via [FRS Learn](#)

E-bikes and e-scooters fire safety guidance

PDF Format



NFCC
National Fire
Chiefs Council

National Fire Chiefs Council Limited...

71-75 Shelton Street, Covent Garden, London, WC2H 9JQ



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Guidance

Statutory guidelines on lithium-ion battery safety for e-bikes

Guidance for businesses.

From: Office for Product Safety and Standards
(</government/organisations/office-for-product-safety-and-standards>)

Published 12 December 2024

Applies to England, Scotland and Wales

Contents

- About these guidelines
- 1) Who is this for
- 2) Products in scope of these guidelines
- 3) Battery safety and thermal runaway
- 4) Regulatory position on safe products under GPSR
- 5) Producer responsibilities
- 6) Product safety assessment: demonstrating protections against thermal runaway (Producers)
- 7) Distributor responsibilities
- 8) Product safety assessment: demonstrating protections against thermal runaway (Distributors)
- 9) Legal requirements
- 10) Non-compliance with the regulatory requirements
- 11) Further information

These statutory guidelines are made by the Department for Business and Trade to assist businesses in producing safe lithium-ion batteries for use in e-bikes.

Lithium-ion batteries used in e-bikes can pose a serious fire risk through a process known as thermal runaway. At least 10 fatalities occurred in fires started in e-bikes or e-scooters powered by lithium-ion batteries in the UK in 2023, with almost 200 fires recorded.

These statutory guidelines set out the safety mechanisms that lithium-ion batteries for e-bikes must contain to address the risk of thermal runaway. They must be taken into account by producers of lithium-ion batteries when assessing whether their battery meets legal safety requirements and by distributors in ensuring they do not supply products that they know or ought to know to be dangerous, in line with their legal requirements under the [General Product Safety Regulations 2005](https://www.legislation.gov.uk/ukxi/2005/1803/contents) (<https://www.legislation.gov.uk/ukxi/2005/1803/contents>) (GPSR) as it applies in Great Britain (GB). However, adherence to these guidelines is strongly recommended for businesses placing such products anywhere on the UK market.

The GPSR applies to all lithium-ion batteries for e-bikes, including those sold online or those sold for use with or as part of a conversion kit. It is an offence to place a lithium-ion battery on the market if it is not a safe product.

The Office for Product Safety and Standards (OPSS), as the UK's national product regulator, and Local Authority Trading Standards, have powers to enforce the GPSR and there are sanctions, including criminal sanctions, for those that do not comply.

1) Who is this for

1.1 These statutory guidelines are for businesses who produce, import or distribute lithium-ion batteries for use with e-bikes, including converted e-bikes that are made available on the GB market.

1.2 These guidelines are made by the Secretary of State for Business and Trade under regulation 6(3)(c) of the GPSR. They must be taken into account by businesses when assessing whether a lithium-ion battery meets the general safety requirement under regulation 5 of the GPSR.

1.3 'Lithium-ion battery' should be taken to mean lithium-ion battery packs supplied for use with e-bikes or e-bike conversion kits, incorporating individual cells and protective measures that are intended to be charged

either with the e-bike or separately. Page 225
batteries used in laptop computers, are not in scope of these guidelines.

1.4 The guidelines focus on key areas of concern. The contents of these guidelines are not an exhaustive list of the actions businesses must take to meet the requirements of the GPSR when producing, importing or distributing products.

1.5 These guidelines will be used by regulators to help determine whether lithium-ion batteries meet the legal safety requirements under GPSR.

2) Products in scope of these guidelines

2.1 E-bikes are typically powered by lithium-ion batteries. E-bikes can be sold as complete products (including a compatible battery pack and battery charger) and replacement batteries can be purchased for them. Standard pedal bikes can be converted to an e-bike, using a conversion kit comprising various parts that typically include some or all of: a motor, motor controller, battery, battery charger, handlebar controls, sensors and wiring to connect the components.

2.2 Lithium-ion batteries produced to supply power to e-bikes (including e-bike conversions) are in scope of the GPSR and must meet the general safety requirement of these regulations. The key requirement is that businesses must ensure that products placed on the market are safe.

3) Battery safety and thermal runaway

3.1 Poorly designed, poorly manufactured or incompatible battery components, and the use of batteries outside of their safe design parameters, present a risk of thermal runaway.

3.2 Thermal runaway happens when the temperature of individual battery cells contained within a battery reaches a critical point at which exothermic reactions occur. Exothermic reactions are chemical reactions that generate heat faster than it can be dissipated within the battery cell. This creates gas within the cell, causing the cell casing to rupture, which can result in the release of flammable and potentially toxic gases that could ignite, causing a fire and/or explosion. This has the potential to endanger life and destroy property.

3.3 Battery cells in thermal runaway are likely to increase the temperature of adjacent cells within the battery pack, resulting in additional cells entering thermal runaway and a cascading effect throughout the battery. This can result in gases igniting, causing a fire and/or explosion that can develop

rapidly and become extremely volatile, with the potential to spread to its surrounding environment.

4) Regulatory position on safe products under GPSR

Battery protective system

4.1 To be considered a safe product under GPSR, a lithium-ion battery intended for use with e-bikes or e-bike conversion kits must include safety mechanism(s) (such as a battery management system, and/or other equivalent safety features) whose functionality is capable of preventing thermal runaway from occurring during normal operation and conditions of reasonably foreseeable misuse. This includes when the e-bike is in use and the battery is discharging power, and when the battery is being charged.

4.2 A core safety mechanism could be the presence of an effective battery management system, which is a local energy management system for the battery pack/system. Its function includes protecting the battery system from damage, which in turn prevents the battery pack from entering thermal runaway. Where a battery management system is not present, a battery should have equivalent protective safety features that perform a comparable function.

4.3 An effective battery protection system must be capable of detecting the voltage of individual cells and the battery pack current, and the temperature of the cells during charging and discharging of the battery pack. It must be able to act to prevent charging or discharging from causing over- or under-voltage of any cell, over-current of the pack, and over- or under-temperature of the cells, to prevent the battery from entering into thermal runaway where operating outside of normal and manufacturer-stated parameters.

4.4 The battery protection system must also be capable of preventing the battery cells from entering thermal runaway as a result of the charging of the battery pack by an incompatible battery charger.

Battery design and physical construction

4.5 The design and construction of a lithium-ion battery should sufficiently resist damage from external sources. This includes high and low temperatures (including sunlight), liquids (including water ingress), and reasonably foreseeable impact and vibration from normal wear and tear.

Information requirements

4.6 Battery packs should be supplied with sufficient information to enable businesses and users to be able to assess the compatibility of the battery for its intended use. Particularly, information should be provided on sourcing compatible chargers.

4.7 Battery packs should be provided with sufficient information and instruction to inform users how to charge the product safely and to establish safe charging practices.

5) Producer responsibilities

5.1 The GPSR sets out the obligations of 'producers'. This includes businesses who manufacture and import products. The definition of a 'producer' is set out in Regulation 2 of the GPSR.

5.2 Before placing a product on the market, producers must ensure that it is safe. This means, under normal or reasonably foreseeable conditions of use, the product does not present any risk or presents only the minimum risk compatible with the product's use, and which is considered acceptable and consistent with a high level of protection of health and safety.

5.3 To achieve this, a producer must ensure that lithium-ion batteries produced for e-bikes possess adequate and effective safety protections to mitigate the risk of thermal runaway. They must also ensure that the battery is constructed in such a way that it is protected from reasonable external damage, and is supplied with relevant product information.

5.4 Producers must also adopt measures to enable them to be informed of risks the product might present, such as:

- a. sample test products they produce
- b. investigate and, if necessary, keep a register of complaints concerning the safety of the product
- c. keep distributors informed of the results of such monitoring where a product presents a risk or may present a risk

5.5 Where the producer knows that a product they have placed on the market or supplied poses risks to the consumer that are incompatible with the general safety requirement, they must notify OPSS or their Local Authority Trading Standards in writing about the risks and the action taken to prevent risk to the consumer.

5.6 OPSS has published [guidance on completing notifications to enforcement authorities regarding product safety risks](https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products) (<https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products>).

5.7 Additionally, the British Standard **Page 228** has published a [Code of Practice on Corrective Actions and Recalls](https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/) (<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/>) that provides guidance on fulfilling these obligations.

6) Product safety assessment: demonstrating protections against thermal runaway (Producers)

6.1 Producers should consider the following steps:

- Demonstrating the battery meets the safety requirements to protect against thermal runaway, or the causes of thermal runaway, as set out in relevant standards, and making use of the latest technologies.
- Compiling technical documentation that demonstrates the performance of safety mechanisms present in a lithium-ion battery, and how they are designed to protect against thermal runaway or the causes of thermal runaway.
- Holding copies of product test reports that demonstrate the performance of safety mechanisms present in a lithium-ion battery, designed to protect against thermal runaway or the causes of thermal runaway as set out in section 4, and providing this documentation to an enforcement authority upon request.

6.2 However, there may be other ways for producers to carry out a product safety assessment that demonstrates that a lithium-ion battery in scope of these guidelines is a safe product.

6.3 These guidelines do not specify the routes producers must take. Businesses are responsible for ensuring they comply with the law and are best placed to assess this when considering their specific products, procedures and operations.

7) Distributor responsibilities

7.1 The GPSR places obligations on distributors of products. The definition of a distributor is set out in regulation 2 of the GPSR.

7.2 Distributors are required to act with due care to help ensure only safe products are supplied on the market. Distributors must not supply products that they know or ought to know to be dangerous. For example, if a product has been subject to a recall, or if they are notified of a safety concern by a producer, distributors must not supply any such products they may still have in stock.

7.3 Distributors must also cooperate with enforcement authorities at their request. This includes providing information they hold relating to risks posed by the product and enabling the product's identity and origin to be traced. Distributors must take appropriate action to remove the risk from consumers such as withdrawing dangerous products from the market and participating in any corrective action or recall activities.

7.4 Where the distributor knows that a product they have placed on the market or supplied poses risks to the consumer that are incompatible with the general safety requirement in the GPSR, they must notify the producer and the relevant authority in writing about the risks and the action being taken to prevent risks to the consumer.

7.5 OPSS has published [guidance on completing notifications to enforcement authorities regarding product safety risks](https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products) (<https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products>).

8) Product safety assessment: demonstrating protections against thermal runaway (Distributors)

8.1 These guidelines do not specify the routes distributors must take. Businesses are responsible for ensuring they comply with the law, and are best placed to assess this when considering the products they supply, their procedures and operations.

8.2 However, distributors should consider the following steps:

- Obtaining information from producers and sellers confirming that a battery meets the requirements to protect against thermal runaway or the causes of thermal runaway, which are set out in relevant standards or using the latest technologies.
- Ensuring that products they distribute possess the relevant information in instructions and/or markings, as set out in section 4.7.
- Putting in place any assurance procedures they deem necessary to confirm the substance and/or accuracy of technical information supplied by producers.

8.3 Distributors should assure themselves, before making a lithium-ion battery available on the market, that the product is compliant and meets the requirements of the GPSR.

9) Legal requirements

9.1 The GPSR provides the basis for the safety of consumer products by setting out safety requirements and obligations that businesses must meet.

9.2 The legal basis for issuing these guidelines is regulation 6(3)(c) of the GPSR as it applies in GB, which makes provision for the Secretary of State to set guidelines on assessing a specific product's safety for the purposes of GPSR.

9.3 These guidelines must be taken into account by businesses in assessing whether lithium-ion batteries for e-bikes and e-bike conversion kits meet the requirements of GPSR as they apply in GB.

9.4 Where businesses involved in the production or distribution of products in scope of these guidelines do not take account of them when placing such products on the market, they will be in breach of their responsibilities under the GPSR.

9.5 In addition, following these guidelines is strongly recommended for businesses producing or distributing such products placed on the Northern Ireland market.

10) Non-compliance with the regulatory requirements

10.1 OPSS and Local Authorities have powers to enforce the requirements in the GPSR, including the requirement for products to be safe.

10.2 If investigations identify non-compliance with the GPSR, authorities will be able to take action against producers and distributors, which could require businesses to recall products from consumers, suspend supply of products, warn customers about risks, or withdraw products from sale. Additionally, where non-compliant products are identified at the border, they may be prevented from entry.

10.3 Producers and distributors are required to cooperate with enforcement authority requests in relation to action taken to mitigate risks posed to consumers by a product, including providing information and documentation upon request.

10.4 Where businesses breach certain obligations under GPSR, and it is appropriate and proportionate to the circumstances of the breach, enforcement authorities may initiate prosecution proceedings and, if found guilty of an offence, the person or persons responsible could face an imprisonment sentence and/or financial penalty.

11) Further information

Voluntary standards can often help **Page 231**ers to meet legal requirements. To find out more about the standards that apply to e-bikes and their batteries, please refer to:

- BS EN 50604-1:2016+A1:2021 – Secondary lithium batteries for light EV (electric vehicle) applications – Part 1: General safety requirements and test methods
- BS EN 15194:2017+A1:2023 for Electrically power assisted cycles – Designated to provide a presumption of conformity under the Supply of Machinery (Safety) Regulations 2008.

For more information on bringing safe products to market and undertaking product recalls and other corrective actions, please refer to the free PAS documents on the BSI website:

- [PAS 7050:2022 Bringing Safe Products to the Market](https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7050-bringing-safe-products-to-the-market-code-of-practice/)
(<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7050-bringing-safe-products-to-the-market-code-of-practice/>)
- [PAS 7100:2022 Product Recall and Corrective Actions](https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/)
(<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/>)

For further information on the General Product Safety Regulations 2005, as they apply in Great Britain, please refer to:

- [General Product Safety Regulations 2005](https://www.legislation.gov.uk/ukxi/2005/1803/contents)
(<https://www.legislation.gov.uk/ukxi/2005/1803/contents>) – legislation.gov.uk
- [Guidance on the General Product Safety Regulations 2005](https://www.gov.uk/government/publications/general-product-safety-regulations-2005/general-product-safety-regulations-2005-great-britain)
(<https://www.gov.uk/government/publications/general-product-safety-regulations-2005/general-product-safety-regulations-2005-great-britain>)

For further information on completing statutory notifications where products have been identified as unsafe or non-compliant, please refer to:

- [Business notifications of unsafe and noncompliant products](https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products)
(<https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products>)

For information about OPSS' approach to delivering regulation, please refer to:

- [OPSS Enforcement Policy](https://www.gov.uk/government/publications/safety-and-standards-enforcement-enforcement-policy/opss-enforcement-policy) (<https://www.gov.uk/government/publications/safety-and-standards-enforcement-enforcement-policy/opss-enforcement-policy>)

Enquiries in relation to this guidance should be directed to:
opss.enquiries@businessandtrade.gov.uk.



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