

Cheltenham Borough Council Cabinet

Meeting date: Tuesday, 17 March 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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Contact: democraticservices@cheltenham.gov.uk

Phone: 01242 264 246

SECTION 1 : PROCEDURAL MATTERS

1 Apologies

2 Declarations of interest

3 Minutes of the last meeting

The minutes of the meeting held on 24 February 2026 will be considered at the next meeting.

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 Homeseeker Policy Review (Pages 5 - 28)

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

6 Equality, Diversity and Inclusion Policy (Pages 29 - 76)

Report of the Leader, Councillor Rowena Hay

7 Housing Payments - Crisis and Resilience Fund Policy (Pages 77 - 102)

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

8 Discretionary Business Rate Relief (Pages 103 - 132)

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

9 Biodiversity Report (Pages 133 - 174)

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

10 Notification of decisions made by the Community Infrastructure Levy (CIL) Joint Committee (Pages 175 - 188)

Report of the Leader, Councillor Rowena Hay

SECTION 6 : BRIEFING SESSION

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 – 17th March 2026

Consultation on revisions to Homeseeker Plus

Allocations Policy

Accountable member: Cabinet Member for Housing and Customer Services,
Councillor Flo Clucas

Accountable officer: Head of Strategic Housing, Martin Stacy

Ward(s) affected: All

Key Decision: Yes

Executive summary:

The Homeseeker Plus Partnership consists of the six local authorities within Gloucestershire and West Oxfordshire District Council, working in partnership with social landlords to provide affordable homes for people to rent. Properties from these housing providers are advertised on the Homeseeker Plus website, which applicants can then apply for.

The purpose of the [Homeseeker Plus Policy](#) is to explain who is eligible to apply for affordable housing and how their housing needs will be assessed. This assessment must be in line with relevant legislation and the statutory code of guidance on the allocation of accommodation, as these set out how applications will be assessed in a fair and transparent way based on housing need.

The last review of this policy was consulted on and updated in 2020, and it is now considered timely to review our Homeseeker Plus Policy again.

This report highlights some of the key changes that we will be seeking consultation on. Following consultation, relevant approval will then be sought to adopt the agreed changes.

Recommendations: That Cabinet:

- 1. authorises this Authority to consult on the proposed changes to the Homeseeker Plus Allocations Policy; and**
 - 2. delegates authority to the Head of Strategic Housing, in consultation with the Cabinet Member for Housing and Customer Services, to approve the new policy after the consultation period has ended, provided that there are no further material changes other than those that have already been identified within this report.**
-

1. Implications

1.1 Financial, Property and Asset implications

None as a direct result of this report.

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

1.2 Legal implications

As a Local Housing Authority, the Authority has a statutory duty in respect of the allocation of housing to applicants within the Borough. These duties are contained in Part VI and VII of the Housing Act 1996 (as amended) and the Homelessness Reduction Act 2017. In addition to these duties the Authority has a duty to ensure that it operates in accordance with its duties under the Equalities Act 2010. When considering changes to the policy the Authority must undertake a fair, reasonable and transparent consultation and consider any responses to that consultation before determining whether or not to make changes to the policy.

Signed off by: Alison McKane, Interim Deputy Monitoring Officer,
alison.mckane@cheltenham.gov.uk

1.3 Environmental and climate change implications

This report relates to updating an existing policy and is regarding an online housing system, and as such will not have any impact on the council's and borough's carbon emissions

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

Equality impact assessment completed on behalf of the Homeseeker Plus partnership is found at Appendix 2 of this report.

1.6 Performance management – monitoring and review

The Homeseeker Plus Co-ordinator will run regular reports to monitor performance of the scheme in meeting the aims of the policy, and these will be considered via our county-wide partnership arrangements.

This Homeseeker Plus policy will be regularly reviewed to ensure that it considers changes in demand and need within the district, and that it continues to meet its aims and objectives and complies with any legislative changes.

Any changes to the Homeseeker Plus Policy will be implemented only with the agreement of the members of the Partnership, as specified within the partnership agreement following any necessary consultation, and the relevant approvals being given by each Authority.

2 Background

2.1 Homeseeker Plus is a choice-based lettings (CBL) scheme run by the Homeseeker Plus Partnership, which consists of the six local authorities within Gloucestershire along with West Oxfordshire District Council, who work in partnership with social housing landlords to provide affordable homes for people to rent.

2.2 The seven local authorities within the Homeseeker Plus partnership are Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council, Tewkesbury Borough Council and West Oxfordshire District Council.

2.3 Households who wish to apply to go onto Homeseeker are assessed for eligibility, and if eligible, they are then placed into one of four different 'bands' (Emergency, Gold, Silver and Bronze) depending on the nature of their housing need. Those in the highest housing need are placed in the Emergency band, whilst those with the lowest housing need are placed into the Bronze band. Please see Appendix 4 for more information on the banding matrix.

2.4 Homeseeker Plus enables affordable housing providers to advertise their homes on the Homeseeker Plus website, and applicants are able to express an interest in them. This is known as placing a "bid" for a property. Once a bid is placed, the

system will generate a shortlist, placing applicants in order of band, band start date and whether they meet the criteria of the advert. Priority for properties goes to those in the highest (i.e. Emergency) band, and then to people who have been waiting the longest within that band. If there are no bids from applicants in the highest band, then the local authority will look to those households in the Gold band, and so on until an applicant is identified. Priority is also initially given to people who have a local connection with the local authority in which the property is located, followed by those who have a local connection with any of the other Homeseeker Plus districts, and finally to anyone else.

3 Reasons for recommendations

- 3.1 It is necessary that Homeseeker Plus Policy is up to date, reflects current legislation and housing priorities.
- 3.2 The Homeseeker Plus policy is open to interpretation and can be implemented differently across the partnership. It is recommended that we provide greater clarification within the policy to ensure consistency throughout the partnership.
- 3.3 The review has provided an opportunity to consider the Homeseeker Plus Policy more generally, and to consult on several proposed changes and additions to the scheme.

4 Proposed main changes

4.1 Who qualifies for social housing

It is proposed to consider a change on how applicants are assessed and to who qualifies to join the housing register for social housing. At present, an applicant who can reasonably afford to buy a home that meets their essential housing needs would not qualify to join the housing register.

The proposed change is to whether the assessment should take into account whether an applicant has sufficient financial resources to rent a suitable home in the private rented sector. For the avoidance of doubt, this would be part of the assessment and not a single consideration

Under this proposal, if an applicant can reasonably meet their housing needs through private renting or buying a home, they would not qualify to join the housing register.

This change would help ensure that social housing is provided to those most in need, and not able to more easily resolve their housing.

4.2 Deliberate worsening of circumstances

It is proposed to consider a change to how deliberate worsening of circumstances is treated. This means situations where applicants make choices that worsen their housing situation, for example, giving up suitable accommodation without good reason.

Under this change, these applicants would be placed in the lowest priority band (Bronze) for six months. After that, they would only move to a higher band if they can show they have taken all reasonable steps to find alternative accommodation and actively tried to resolve their situation.

4.3 Acting on professional advice

A new requirement is being proposed to ensure applicants follow reasonable advice before being awarded a higher priority band.

Where an applicant's housing situation could reasonably be improved without a move, advice or support may be offered by the Council or other professionals, such as Environmental Health or Disabled Facilities teams. This may include working with a landlord on repairs, allowing time for improvement works to take place, or exploring whether adaptations could enable a household to remain safely in their home.

Under this proposal, if applicants choose not to follow the reasonable advice that has been offered, they may not be awarded a higher banding.

4.4 Employment and local connection

A proposal to review how employment is used to establish local connection.

At present, any household member included on an application who works in the district can help establish a local connection. Under the proposed change, only the main or joint applicant's employment would count — unless there are exceptional circumstances.

This would mean the policy would mirror government guidelines for local authorities on local connection in this area and help improve consistency across the partnership.

4.5 Expanding local connection options for members of the Armed Forces

National rules already allow members and former members of the Armed Forces to be treated as having a local connection without needing to meet the usual tests, recognising the frequent moves required during service. Homeseeker Plus complies with this requirement, and eligible applicants are currently awarded a local connection to one local authority area of their choosing.

The proposal is to look at how local connection should work across the Homeseeker Plus partnership.

There are several options for how local connection could apply within the partnership for eligible Armed Forces applicants, and the proposal is to consult on the following:

A. Choice by the applicant (opt-in)

Applicants choose which Homeseeker Plus council areas they wish to be considered for. They are then treated as having a local connection to each area they select.

B. Automatic across the partnership (opt-out)

Applicants are automatically treated as having a local connection to all Homeseeker Plus council areas, unless they ask to limit their choices.

C. No change (current approach only)

No additional local connection beyond what legislation currently requires.

Applicants would continue to choose one council area to be treated as having a local connection to.

4.6 Emergency banding for downsizing

Emergency Banding is awarded to social housing tenants who agree to move to smaller housing.

At present, social housing tenants in Gloucestershire and West Oxfordshire who are willing to move from family accommodation to non-family housing within the partnership area are automatically awarded Emergency Banding.

The proposed change is that this banding would only be awarded if the move releases a property that is in high demand or limited supply, helping to ensure individual local authority areas have more autonomy over managing supply and demand specific to their district.

4.7 Additional Bedroom Need

Some households may qualify for an extra bedroom, for example, if they have a foster child or a carer.

The proposal is to consider whether couples who cannot share a bedroom due to medical or disability reasons should be awarded an additional bedroom. In these cases, consideration may be given to whether separate single beds could resolve the issue without needing an extra bedroom.

4.8 Demotion Period and Reassessment

Some categories of housing need are time limited to recognise urgency. Applicants in these categories are expected to bid for all suitable properties each week and across a wide range of locations. If, at the end of the time limited period, it appears that an applicant is waiting for a particular property and not treating their circumstances as urgent, they may be demoted to a lower banding.

At present, demotion periods vary case by case. We are therefore seeking to provide greater consistency across the partnership, and provide clarity for applicants, by consulting on a proposed change to set a fixed demotion period of 6 months. After this, the local authority would reassess the applicant's situation. If the applicant has not taken all reasonable steps to resolve the issue that led to the demotion, the lower banding would remain in place indefinitely until sufficient evidence is provided.

4.9 Bedroom Need Assessment for pregnant households

Proposal to update the allocation scheme so that households who currently have a one-bedroom housing need and include a pregnant applicant will be assessed as needing an additional bedroom once the pregnancy reaches 28 weeks (i.e. the start of the third trimester).

5 Consultation and feedback

- 5.1 These proposals have been developed in collaboration with key stakeholders, including the other local authorities and housing providers who make up the Homeseeker Plus Management Board.
- 5.2 The consultation will be carried out on behalf of the partnership by Ark Consultancy, who have extensive experience of working within the social housing sector and providing consultancy services.
- 5.3 It is proposed that the next steps are to put the proposed changes out for consultation in order that we can establish a more fully informed local policy position.

6 Key risks

- 6.1 Please refer to Appendix 1, which sets out our risks. These relate principally to the need for consultation before any changes to our policy are implemented, and to ensure that we have considered any impact on Equalities. (Our Equality Impact Assessment can be found at Appendix 2).

Report author:

Paul Tuckey, Housing Options Manager, paul.tuckey@cheltenham.gov.uk

Appendices:

1. Risk Assessment
2. EQIA Homeseeker Plus Partnership, March 2026

Background information:

N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the proposed changes do not take account of the Equalities Act, then the Homeseeker Plus Allocations Policy could be challenged and deemed unlawful.	Martin Stacy	3	1	3	Reduce	An equality and diversity impact assessment has been completed by the partnership to help alleviate against this risk, and it will be reviewed post consultation and then published once approval is given to make any relevant changes to the Homeseeker Plus Policy. The policy is drafted in such a way as to still enable flexibility to be retained around key issues	Paul Tuckey	Winter 2026
	If the proposed changes to Homeseeker Plus Allocations Policy are not consulted on, then	Martin Stacy	3	3	9	Reduce	Cabinet approves recommendation to go out for consultation to stakeholders.	Paul Tuckey	Winter 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
	opportunities for the changes to be carried out on an informed basis will be missed.								
	If the council does not review the Homeseeker Plus Policy, then opportunities to reduce inconsistency in operational practices across the districts will be missed and the policy will fail to reflect most recent case law and good practice.	Martin Stacy	2	3	6	Reduce	Recommendation to go out for consultation to reduce this risk.	Paul Tuckey	Winter 2026

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Equality and Rurality Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the ‘protected characteristics’ may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Thomas See/Caroline Clissold (for Publica, on behalf of the Homeseeker Plus Partnership); and Paul Tuckey, Housing Options Manager for Cheltenham Borough Council	
Date of assessment: 26 January 2026	Telephone: Email: Paul.Tuckey@cheltenham.gov.uk

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2. Name of the policy, service, strategy, procedure or function:

HomeseekerPlus Common Allocations Policy Document
Is this a new or existing one? Existing

3. Briefly describe its aims and objectives

<p>The HomeseekerPlus Allocations Policy aims to:</p> <ul style="list-style-type: none"> • Ensure fairness, transparency, and equality of opportunity in the allocation of social housing. • Prioritise households with the greatest housing need, while supporting sustainable communities. • Provide applicants with informed choice and accessible processes, including support for less able applicants. • Make best use of available housing resources, including enabling mobility within social housing and giving priority to those with a local connection where appropriate. • Help local authorities meet their statutory duties under housing and homelessness legislation. • Contribute to tackling discrimination and promoting inclusion across Gloucestershire and West Oxfordshire.
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HomeseekerPlus is a sub-regional housing allocations scheme using choice-based lettings that operates across Gloucestershire and West Oxfordshire to oversee the allocation of social housing in the area.

4. Are there any external considerations? (e.g. Legislation/government directives)

The policy is regularly reviewed to make sure it reflects:

- national policy and legislation
- new case law,
- local policy changes, and
- local housing need/supply

Since the policy was last reviewed, amended and adopted in March 2022, there have been some external considerations that need to be taken into account. These include (not exhaustive):

- The Allocation of Accommodation: Guidance for Local Authorities in England (2020) has been revised in 2025. The updated version includes strengthened provisions for domestic abuse survivors, care leavers, and Armed Forces personnel.
- A new statutory instrument — The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025
- Cheltenham Borough Council – new Housing, homelessness and rough sleeping strategy 2023 – 2028
- Cotswold District Council - Preventing homelessness strategy 2025-2030
- Stroud – new Housing, homelessness & rough sleeping strategy 2024-2029
- Tewkesbury Borough Council housing and homelessness strategy 2022-26
- Forest of Dean District Council – new Preventing homelessness strategy 2025
- West Oxfordshire – new Preventing homelessness strategy 2025-2028

The proposed changes result from the latest review of the policy. The HomeseekerPlus partnership is governed by a HomeseekerPlus Management Board. The Board includes representatives from all of the partner Councils. All of the changes have been considered and agreed by HomeSeekerPlus Management Board.

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	✓	<ul style="list-style-type: none"> Demographic data extracted from the Locata housing allocations software system Census 2021 data on: sex; age; religion; race; disability
Recent research findings including studies of deprivation	✓	<ul style="list-style-type: none"> 6 of the 7 participating councils within the HomeseekerPlus Scheme have published new housing and/or homelessness strategies over the last 3 years. There will be research and data underpinning and informing these, especially strategies covering homelessness. There is a legal requirement to complete a comprehensive review of homelessness in your area to inform your homelessness strategy. These strategies have informed and been a point of reference for the allocations policy development.
Results of recent consultations and surveys	✓	<ul style="list-style-type: none"> Where significant changes are proposed to a housing allocations scheme, the housing authority must ensure that affected customers and Registered Provider partners are informed within a reasonable timeframe and that appropriate consultation is undertaken. A 4-week consultation process as outlined above will be undertaken using Survey Monkey and links provided to all current applicants. Additional stakeholder engagement sessions will also be held during the consultation process.
Results of ethnic monitoring data and any equalities data	✓	<ul style="list-style-type: none"> Equalities monitoring data from the Locata housing allocations software system
Anecdotal information from groups and agencies within Gloucestershire	✓	<ul style="list-style-type: none"> The 4-week consultation will request feedback from: Registered Provider partners operating in the area; County Councils; NHS; Social Care; Internal colleagues.

Comparisons between similar functions / policies elsewhere	✓	<ul style="list-style-type: none"> • ARK Housing consultancy supported part of the process of reviewing the current HomeseekerPlus allocations scheme/policy. ARK support reviews of council housing allocations schemes across the country so bring knowledge of other policies and practice for comparison.
Analysis of audit reports and reviews	✓	<ul style="list-style-type: none"> • The allocation of social housing processes include a legal right to review decisions made in relation to processing housing applications and allocation of social housing. Representatives on the HomeseekerPlus Partnership Board have used data on review decisions to inform the proposed changes to the policy.
Other:	✓	<ul style="list-style-type: none"> • Trends and data relating to complaints and the Ombudsman has also been taken into account.

6. Please specify how intend to gather evidence to fill any gaps identified above:

No gaps – see above.

7. Will any consultation been carried out?

Yes -

Details of Consultation

Where significant changes are proposed to a housing allocations scheme, the housing authority must ensure that affected customers and Registered Provider partners are informed within a reasonable timeframe and that appropriate consultation is undertaken. A 4-week consultation process will be undertaken using Survey Monkey and and links provided to all current applicants. Additional stakeholder engagement sessions will also be held during the consultation process.

If NO please outline any planned activities

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
<p>Comments: e.g. Who will this specifically impact? The policy changes include some amendments to ‘tidy’ the document up, provide procedural clarity and improved transparency. These changes are not considered material. These changes should help staff giving them more clarity regarding the policy and enabling them to apply it consistently.</p> <p>There are some more major changes proposed. The majority of these changes are NOT likely to impact a large number of applicants although limited data is available to quantify this. The changes are outlined below:</p> <ul style="list-style-type: none"> ● Who does not Qualify: We are considering a change to how we assess who may not qualify for social housing. We are considering whether all tenur types should be considered when assessing if applicants have sufficient financial resources to adequately resolve their own housing need. Previously, this was limited to whether an applicant had sufficient financial resources to resolve their housing needs by purchasing a property. This change is not likely to impact a specific group of applicants but will impact households across the scheme in a range of circumstances/with a range of characteristics if they have financial means to resolve their own housing needs. ● Deliberate worsening of circumstances: we are considering a change to how deliberate worsening of circumstances is treated. These applicants would be placed in the lowest priority band (Bronze) for six months. After that, they would only move to a higher band if they can show they have taken all reasonable steps to find alternative accommodation and actively tried to resolve their situation. This change is not likely to impact a specific group of applicants but will impact households across the scheme in a range of circumstances/with a range of characteristics if they have deliberately worsened their circumstances. ● Acting on professional advice: A new rule is being considered to ensure applicants follow reasonable steps before a higher banding is awarded. Applicants are sometimes given advice or recommendations by the Council or other professionals to help improve their housing situation. Under this proposal, if applicants choose not to follow reasonable steps, they may not be awarded a higher banding ● Employment & local Connection: HomeseekerPlus is reviewing how employment is used to establish local connection. At present, any household member included on an application who works in the district can help establish a local connection. Under the proposed change, only the main or joint applicant’s employment would count — unless there are exceptional circumstances. 	

- **Expanding Local Connection Options for members of the Armed Forces:** Recent legislation has come into effect regarding the exemption of all members and former members of the Armed Forces from the Local Connection test. This has been implemented and all applicants who meet the criteria are awarded a local connection to a Local Authority of their choosing. We are proposing to expand this further to allow members or former members of the Armed Forces the opportunity to apply for a local connection to all the HomeseekerPlus partners, or to choose some of the partners who they would like to be given a local connection to. This is not likely to apply to many applicants, however as this is being offered over and above legislation and to a specific demographic and not to all applicants generally, could disproportionately affect others.
- **Emergency banding for downsizing:** Emergency Banding is sometimes awarded to social housing tenants who agree to move to smaller housing. At present, social housing tenants in Gloucestershire and West Oxfordshire who are willing to move from family accommodation to non-family housing within the partnership area are automatically awarded Emergency Banding. The proposed change is that this banding would only be awarded if the move releases a property that is in high demand or limited supply.
- **Additional bedroom need:** To allow couples who cannot share a bedroom due to medical or disability reasons to be awarded an additional bedroom. In these cases, consideration may be given to whether separate single beds could resolve the issue without needing an extra bedroom.
- **Demotion Period & Reassessment:** Some categories of housing need are time limited to recognise urgency. Applicants in these categories are expected to bid for all suitable properties each week and across a wide range of locations. If, at the end of the time limited period, it appears that an applicant is waiting for a particular property and not treating their circumstances as urgent, they may be demoted to a lower banding. At present, demotion period vary case by case. The proposed change is to set a fixed demotion period of 6 months. After this, the local authority would reassess the applicant’s situation. If the applicant has not taken all reasonable steps to resolve the issue that led to the demotion, the lower banding would remain in place indefinitely until sufficient evidence is provided.
- **Additional Bedroom for pregnant households:** The current policy does not recognise unborn children as part of the bedroom need assessment until their birth. It is proposed that households who currently have a one bed housing need and include a pregnant applicant will be assessed as needing an additional bedroom once the pregnancy reaches 28 weeks / the start of the third trimester.

9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People			X	The proposed changes are anticipated to have a neutral impact on younger people on the housing	

				register/HomeseeckerPlus scheme. 70% of people on the housing register/HomeseeckerPlus scheme are aged 20-49 years. More younger people are applying to join the housing register/HomeseeckerPlus scheme in Gloucester City.	
Age – Older People	X	X	X	<p>There are limited numbers of older people on the Housing register/HomeseeckerPlus scheme. For those that are on the register/scheme the changes are anticipated to have a mixed impact – see below.</p> <ul style="list-style-type: none"> • The change in emergency banding for downsizing is more likely to have a negative impact on older people as they are more likely to be under-occupying family housing than younger households. • The change related to an additional bedroom is more likely to have a positive impact on older people as the prevalence of disability and medical issues increases with age. • The employment and local connection change is likely to have a neutral impact on older people as they are less likely to be working or have working children in their household who the change would apply to. 	<ul style="list-style-type: none"> • Retain Emergency Banding where downsizing releases larger family homes or adapted properties in high demand. • Allow discretion for older or disabled tenants where moving supports health, mobility, or independence. • Publish clear guidance with examples so applicants understand when Emergency Banding applies. • Monitor Emergency Banding awards by age profile and review criteria if older tenants are disproportionately affected.
Disability		X		<ul style="list-style-type: none"> • Additional bedroom need: allowing those households who cannot share a bedroom due to medical or disability reasons to be awarded an additional bedroom should have a positive impact on applicants on the housing register/HomeseeckerPlus scheme. 	

				There are just over 6,000 households registered on the HomeseekerPlus scheme with a disability, but we do not hold data on how many of these would benefit from the proposed new category for being awarded an additional bedroom.	
Sex – Male			X	Changes proposed are not anticipated to have a specific impact on applicants according to gender (with the exception of those who are pregnant as set out separately under ‘pregnancy and maternity’ below, and also to older people where there will be proportionately more females than males in the later years – also set out separately under ‘older people’, above).	
Sex – Female			X		
Race including Gypsy and Travellers (GRT)			X	The race of applicants on the housing register is predominantly white – more so than England as a whole but this is reflective of the wider population of the area. The only slight variation is that in Gloucester City there are fewer white persons and more Black or Mixed Ethnic group households than the wider population in that area. There are very limited numbers of GRT households on the housing register/HomeseekerPlus scheme. GRT groups can be disadvantaged by local connection criteria so it has been recommended that working procedures clarify that special circumstances in relation to the local connection qualification criteria should apply to GRT households so that the local connection	Procedures will clarify that local connection requirements do not disadvantage GRT households, with officer training and monitoring to ensure consistency

				requirement does not apply to these households.	
Religion or Belief			X	Changes proposed are not anticipated to have a specific impact on applicants according to religion.	
Sexual Orientation			X	Only 388 applicants completed the sexuality field on their housing application so this data is not statistically reliable. However, the changes proposed are not anticipated to have a specific impact on applicants according to sexual orientation.	
Gender Reassignment			X	Changes proposed are not anticipated to have a specific impact on applicants according to gender reassignment.	
Pregnancy and maternity		X	X	There were nearly 600 households on the housing register/Homeseecker Plus scheme who included a pregnant woman. However, in the main, these proposed changes are not anticipated to have a specific impact on applicants according to pregnancy & maternity. The exception is that one of the proposed changes includes allowing for an extra bedroom for females who are pregnant with their first child and in their third trimester. This proposed change is likely to have a positive impact on this group.	
Geographical impacts on one area			X		
Other Groups			X		

Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.			X	None of the changes are specific to geography and not expected to impact rural areas more than urban areas.	
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10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Downsizing change: Draft clear guidance on when Emergency Banding applies, with examples, including safeguards for older/disabled tenants.	HomeseekerPlus Policy Lead	Officer time	Before policy implementation
Ensure discretion is retained for older/disabled tenants where downsizing supports health, mobility, or independence	Local Authority Housing Managers	Existing staff capacity	Ongoing from implementation
Monitor Emergency Banding awards for downsizing by age profile and report to Partnership Board	HomeseekerPlus Data Analyst	Locata system data Officer time	Quarterly monitoring reports
Train staff on equality considerations in banding decisions, including trauma-informed and disability-aware practice	HomeseekerPlus Partnership Training Lead	Training budget	Within 6 months of implementation
Review outcomes after 12 months; adjust criteria if older tenants are disproportionately affected	HomeseekerPlus Management Board	Officer time	12 months post-implementation

11. Is there is anything else that you wish to add?

Research into creating this EIQ was carried out by ARK Consultancy on behalf of the HomeseekerPlus Partnership

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Declaration

We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	Thomas See/ Caroline Clissold (as Homeseeker Plus leads for the Homeseeker Plus Partnership on behalf of the districts)	Date:	26/01/2026
Line Manager:	Jon Dearing	Date:	26/01/2026
Reviewed by Corporate Equality Officer:	Cheryl Sloan, Assistant Director Workforce Strategy and Tranformation, Publica.	Date:	29/01/2026
Further reviewed, updated and signed off by Head of Strategic Housing for Cheltenham Borough Council:	Martin Stacy	Date:	20/02/2026

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Cheltenham Borough Council

Cabinet – 17 March 2026

Equality, Diversity and Inclusion Policy

Accountable member:

Councillor Rowena Hay, Leader of the Council

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Ward(s) affected:

all

Key Decision: No**Executive summary:**

This report seeks Cabinet approval of the Cheltenham Borough Council Equality, Diversity and Inclusion (EDI) Policy (2026). The policy outlines the Council's strategic commitment to promoting equality, embracing diversity and fostering inclusion across service delivery, employment, housing, partnerships and community leadership.

The policy replaces the previous equality framework and aligns the Council's approach with:

- Equality Act 2010 and the Public Sector Equality Duty (PSED)
- Best practice in local government, including the Local Government Association's Equality Framework for Local Government
- The Council's corporate priorities and ambition to be a more inclusive employer, landlord and service provider
- The council's decision to voluntarily adopt the socio-economic duty (Equality Act 2010, Part 1) in local practice

Adopting the EDI Policy provides a clear corporate framework, expectations for staff and partners, and a governance and accountability structure to ensure equality considerations are embedded in all decisions, policies and services.

Recommendations: That Cabinet:

- 1. approves the Equality, Diversity and Inclusion (EDI) Policy 2026, attached as Appendix 3.**
- 2. delegates authority to the Director of Governance, Housing and Communities, in consultation with the Leader, to make any minor amendments to the policy as required following implementation.**

1. Implications

1.1 Financial, Property and Asset implications

There are no direct financial implications arising from approval of the policy. Delivery of the EDI Action Plan will be managed within existing budgets, with any additional resource requirements brought forward separately.

Signed off by: Jon Whitlock, Head of Finance (Deputy s151 Officer)
jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

Adopting the policy strengthens the Council's compliance with:

- Equality Act 2010
- Public Sector Equality Duty
- Duties relating to service accessibility and employment

It also creates a clear framework to evidence "due regard" in decision-making through equality impact assessments.

Signed off by: Claire Hughes, Monitoring Officer claire.hughes@cheltenham.gov.uk

1.3 Environmental and climate change implications

There are no direct climate implications. However, inclusive engagement supports fair access to climate and sustainability initiatives.

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:

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

1.5 Equality, Diversity and Inclusion Implications

An equalities impact assessment has been completed and is attached

2 Background

2.1 Cheltenham Borough Council has a long-standing commitment to fairness, equality and community cohesion. The borough's population continues to diversify, and the Council delivers services to a wide range of residents, tenants, visitors and businesses.

2.2 The updated EDI Policy has been developed to:

- Provide a coherent corporate approach to equality and inclusion
- Strengthen compliance with the Public Sector Equality Duty
- Reflect best practice and national guidance
- Support the Council's role as a housing provider, employer, commissioner and community leader
- Embed equality analysis in decision-making and service design
- Promote respect, dignity and fair access across all interactions with the Council

2.3 The policy supports the council's ambition to be a fair, inclusive and compassionate organisation, addressing barriers experienced by communities, including those with protected characteristics, lower socio-economic status, or who are seldom heard.

3 Summary of the EDI Policy

The policy sets out

3.1 Commitment and guiding principles

The Council commits to:

- Equal outcomes
- Dignity and respect
- Celebrating diversity
- Creating inclusive environments
- Meeting the needs of protected groups
- Tackling discrimination, harassment and victimisation

3.2 Statutory responsibilities

The Council will:

- Comply with the Equality Act 2010
- Meet the Public Sector Equality Duty
- Apply the socio-economic duty in local decision-making (voluntary adoption)
- Uphold its Armed Forces Covenant commitment

3.3 Approach to EDI

The Council will

- Embed EDI in all services, policies, workforce practices and procurement
- Regularly assess and monitor the impact of decisions
- Deliver inclusive housing services
- Provide accessible information and services
- Work with partners to improve outcomes
- Promote a respectful culture and challenge discrimination

4 Reasons for recommendations

4.1 Approval of this policy will provide the council with a clear, modern, legally compliant framework for promoting equality and inclusion

5 Alternative options considered

5.1 Cabinet council decide not to approve this policy. However, this is not recommended as doing so would compromise the Council's

- compliance with statutory duties
- ability to embed equality in decision-making
- alignment with best practice
- clarity for employees, residents and partner organisation

6 Key risks

6.1 See risk assessment at appendix 1

Report author:

Claire Hughes, Director of Governance, Housing and Communities

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment
- iii. EDI Policy

Background information:

None

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	Without an EDI policy the council risks being in breach of its legal obligations under the Equality Act and Public Sector Equality Duty	Director of Governance, Housing and Communities	4	1	4	Accept	Ensure adoption and implementation of policy		
2	If there is inconsistent implementation of the policy across service areas there is a risk of unequal experiences for residents and employees	Safeguarding and EDI Manager	3	3	9	Reduce	<ul style="list-style-type: none"> • Annual EDI Action Plan with clear service-level responsibilities • EDI Advocates supporting each service • Mandatory EDI training for all staff and councillors • Leadership Team oversight and regular reporting 	Safeguarding and EDI Manager	

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
3	If there is a lack of staff capability of confidence to apply EDI principles then they may not be able to apply inclusive practices	Safeguarding and EDI Manager	3	3	9	Reduce	<ul style="list-style-type: none"> • Comprehensive EDI training programme • Specialist training for high-risk areas (housing, customer contact, enforcement) • Updated HR policies and guidance • Clear escalation routes for concern 	Safeguarding and EDI Manager	
4	Failure to complete meaningful equality impact assessments or apply the Public Sector Equality Duty could result in legal challenge	Director of Governance, Housing and Communities	4	2	8	Accept	Ensure EQIAs are completed and considered as part of decision making		

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: Claire Hughes	Service Area:
Title: Director of Governance, Housing and Communities	Date of assessment: 27 February 2026
Signature: C.Hughes	

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

Equality, Diversity and Inclusion Policy

Is this new or existing?

Is changing

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

Updated to reflect transition of Housing Services and best practice

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

Aims:

The Equality, Diversity and Inclusion (EDI) Policy sets out Cheltenham Borough Council's commitment to:

- Complying with the Equality Act 2010 and the Public Sector Equality Duty
- Advancing equality of opportunity
- Tackling discrimination, harassment and victimisation
- Promoting inclusion in services, employment, housing and community leadership
- Improving access to services and reducing disadvantage
- Voluntarily adopting the socio-economic duty in local practice

- Embed EDI across all council functions
- Comply with statutory duties

Objectives:	<ul style="list-style-type: none"> • Promote fair access to services, housing and employment • Tackle discrimination, harassment and victimisation • Strengthen an inclusive and respectful culture • Use data and equality analysis to make fair decisions • Foster strong community relations • Ensure transparent governance and accountability
Outcomes:	<ul style="list-style-type: none"> • A more inclusive and equitable organisation • Services that better meet the needs of diverse communities • Reduced inequality and discrimination • Fair and transparent decision making • Increased community engagement and trust • Safer and more respectful communities • A representative workforce • Clear evidence of progress
Benefits:	<p>For Residents, Tenants and Service Users</p> <ul style="list-style-type: none"> • Fairer access to services and housing • Improved accessibility and reasonable adjustments • More respectful interactions with staff • Tailored support for vulnerable groups (e.g., disabled people, refugees, survivors of domestic abuse) • Greater involvement in decisions affecting their homes and communities <p>For Employees</p> <ul style="list-style-type: none"> • A more inclusive workplace culture • Fair recruitment, training and progression opportunities • Better support for disability, health conditions, maternity, and caring responsibilities • Protection from discrimination and harassment <p>For the Council</p> <ul style="list-style-type: none"> • Stronger compliance with legal duties and reduced risk of challenge • Better decision-making supported by data and equality analysis • Improved community relationships and trust • More effective service delivery and better outcomes • Stronger partnership working across Cheltenham • Enhanced reputation as an inclusive employer and community leader <p>For Partners and Contractors</p> <ul style="list-style-type: none"> • Clear expectations for equality standards • Stronger consistency in public service delivery across 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:	
This policy is designed to ensure positive impacts on protected characteristics	

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	Claire Hughes
Completion date for Stage Two assessment	27 February 2026

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.

This assessment draw on:

- Workforce equality data
- Local demographic information (e.g. Inform Gloucestershire)
- Feedback from tenants, communities and service users
- Consultation with service leads, HR, and EDI Advocates
- Evidence from complaints, safeguarding, hate crime reporting and customer insight

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.

Scrutiny committee, relevant staff and members

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	Improved access to services; commitment to accessible formats; focus on reducing barriers for younger and older people	
	Younger People (16-25)	Positive	Improved access to services; commitment to accessible formats; focus on reducing barriers for younger and older people	
	Children (0-16)	Positive	Improved access to services; commitment to accessible formats; focus on reducing barriers for younger and older people	
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	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	
	Sensory Impairment (sight, hearing)	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	
	Mental health	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	
	Learning Disability	Positive	Strong commitments to reasonable adjustments, accessible information, inclusive housing services, staff support	

GENDER REASSIGNMENT		Positive	Explicit focus on respect, pronouns, tackling harassment, inclusive communication	
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	Neutral impact; policy promotes fair treatment	
	Men	Neutral	Neutral impact; policy promotes fair treatment	
	Lesbians	Neutral	Neutral impact; policy promotes fair treatment	
	Gay Men	Neutral	Neutral impact; policy promotes fair treatment	
PREGNANCY & MATERNITY	Women	Positive	Commitment to fair employment practices, accessible housing and safeguarding	
RACE* Further information on the breakdown below each of these headings, is available here . For example Asian, includes Chinese,	White	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
	Mixed or multiple ethnic groups	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
	Asian	Positive	Commitments to tackling discrimination,	

Pakistani and Indian etc			hate crime, using accessible language, working with community partners	
	African	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
	Caribbean or Black	Positive	Commitments to tackling discrimination, hate crime, using accessible language, working with community partners	
		Choose an item.		
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Positive	Focus on respect, tackling harassment, promoting cohesion	Page 43
SEX (GENDER)	Men	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	
	Women	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	
	Trans Men	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	

	Trans Women	Positive	Supports gender equality, anti-harassment, inclusive services and workforce equity	
SEXUAL ORIENTATION	Heterosexual	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
	Lesbian	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
	Gay	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	
	Bisexual/Pansexual	Positive	Zero-tolerance to discrimination, support for inclusive communities and staff networks	

Other considerations

Socio-economic factors (income, education, employment, community safety & social support)		Positive	Voluntary adoption of the socio-economic duty; support through advice, benefits and community programmes	
Rurality i.e. access to services; transport; education; employment;		Neutral		

broadband				
Other (e.g. caring responsibilities)	Armed Force Community	Positive	Commitment under the Covenant to ensure fair access	
	Carers	Positive	Accessible information, reasonable adjustments and inclusive services	
	Seldom heard groups	Positive	Clear focus on targeted engagement; community development programmes explicitly designed for inclusion	

* 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 46

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

Action	Target completion date	Lead Officer
Develop and Implement EDI action plan	Ongoing	Safeguarding and EDI Manager
Corporate training for staff and councillors	September 2026	Safeguarding and EDI Manager
Improve data collections and transparency	Ongoing	Safeguarding and EDI Manager
Continue targeted engagement	Ongoing	Safeguarding and EDI Manager

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
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Cheltenham Borough Council

Equality, Diversity and Inclusion Policy

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1. Introduction and purpose of the policy

- 1.1 Cheltenham Borough Council (CBC) is committed to promoting equality, embracing diversity, and fostering an inclusive environment for all customers, employees, partners, and communities. We believe that everyone should be treated with dignity and respect and have equal opportunities to access our housing services, employment, and community support, regardless of their background, identity, or circumstances.
- 1.2 This policy outlines our approach to Equality, Diversity and Inclusion (EDI) and how it underpins our vision to be a landlord of choice, employer of choice, and a key partner in delivering better outcomes for the people of Cheltenham. It also sets out how Cheltenham Borough Council will tackle inequality and foster an inclusive workplace and inclusive communities, as the borough continues to grow, develop, create new opportunities and be a key partner in delivering better outcomes for everyone in Cheltenham.
- 1.3 The policy should be considered alongside other key documents which set out the expectations and requirements of everyone who works for the council.

2. Aims and scope of the policy

- 2.1 We will work with our partners to create fairer opportunities for everyone in the borough. We will support residents of Cheltenham, tenants, leaseholders, service users and council employees to fulfil their potential, treating all members of our diverse community with respect and actively involving people from all groups in shaping the decisions that affect the services they receive, the places they live in or the organisation in which they work.
- 2.2 The policy explains the expectations on our workforce, as we work together to design and deliver services to create a vibrant and inclusive borough. The policy applies to all who represent the Council in any capacity including elected members (councillors), employees, volunteers, agency workers, contractors and consultants. The policy also applies to suppliers, sub-contractors and partners in our supply chain and to all those who live and work in or visit Cheltenham.
- 2.3 The diagram below shows how this policy relates to other key policies and strategies.



3. Defining equality, diversity and inclusion

We define an equal and inclusive borough as one where all residents, tenants and leaseholders, service users, council employees and elected members are supported to fulfil their potential, are treated equally with respect and are actively involved in shaping the decisions that will affect their workplace and wider community.



Equal outcomes

We will treat everyone fairly and equally, so that our employees, tenants, leaseholders, partners and communities have the same opportunities, regardless of their protected characteristics or socio-economic status. To do this, we will move beyond treating 'everyone the same' and instead make sure that we meet the different needs of individuals and groups. This is essential to address discrimination and disadvantage in an unequal society.



Respect

We will treat everyone with dignity and respect. "Respect" can be defined as having due regard for a person's feelings and wishes. Negative behaviours such as discrimination, harassment and intimidation undermine people's dignity, prevent equality and reinforce disadvantage.



Diversity

We will appreciate the value of differences between individuals and groups. We will celebrate the rich diversity, culture and heritage of our community and work with our partners to ensure that everyone in Cheltenham can safely express their views, religion, beliefs, feelings and wishes. Promoting the benefits of a diverse community helps to break down barriers and negative attitudes created through lack of understanding and misinformation and helps to promote social cohesion and good community relations. By embracing diversity, we can draw on a range of lived experience to make better decisions and serve communities more effectively.



Inclusion

Inclusion is about creating environments where everyone feels valued and respected. We will support communities from across the protected groups to actively participate in community life and to influence decision-making. We will support disadvantaged groups to have the opportunity to help shape policy and service changes which will affect them.

4. Meeting our legal and statutory responsibilities

4.1 Protection from unlawful discrimination is provided by the Equality Act (2010) in relation to the following nine protected characteristics:



Age



Disability



Gender reassignment



Marriage and civil partnership



Pregnancy and maternity



Race



Religion or belief



Sex



Sexual orientation

4.2 In addition, the Act contains an integrated Public Sector Equality Duty (PSED), which requires all public bodies and private bodies that deliver a public function, to consider the needs of protected groups which designing and delivering services. As a local authority Cheltenham Borough Council has a legal duty to comply with the PSED which requires us to:

- 1) Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Act.
- 2) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- 3) Foster good relations between people who share a protected characteristic and people who do not share it.

4.3 Having due regard for advancing equality involves:

- 1) Removing or minimising disadvantages suffered by people due to protected characteristics.
- 2) Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- 3) Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

4) Tackling prejudice and promoting understanding between different communities.

4.4 Cheltenham Borough Council is committed to fulfilling our Public Sector Equality Duty. Direct and/or indirect discrimination, harassment or victimisation will not be tolerated within the workplace, or in the way we deliver services or carry out our functions and duties. The Council is committed to promoting equality of opportunity, eliminating unlawful discrimination and promoting community cohesion throughout the borough. We will seek to protect the right of everyone not to be discriminated against and work to ensure equality of opportunity for all, so that each person is supported to realise their potential.

4.5 The council is going beyond its statutory duties under the 2010 Equality Act by seeking to also implement the Act's socio-economic duty (Part 1 Section¹).

4.6 We commit to treating everyone equally regardless of socio-economic status and will work to eliminate discrimination and disadvantage caused by a person's socio-economic status.

4.7 The council is also a signatory to the Gloucestershire Armed Forces Community Covenant which complements, at a local level, the armed forces covenant, outlining the moral obligation between the nation, the government and the armed forces.

5. Our approach and commitment to equality, diversity and inclusion

5.1 Cheltenham Borough Council is committed to ensuring equality, fairness, inclusion, and good relations are at the heart of everything we do. We therefore aim to drive supportive changes making Cheltenham a better place to live, work and visit for everyone.

5.2 To support our commitment to equality, diversity and inclusion the Council will:

- a) Comply with and embrace equality law and good practice, which includes carrying out our public sector duties to promote equality.
- b) Regularly monitor and assess the impact of our policies, services, and functions to ensure they are fair and reflect people's different needs and opinions.

¹ Section 1 of the Equality Act, the socio-economic duty, requires public bodies to adopt transparent and effective measures to address the inequalities that result from differences in occupation, education, place of residence or social class (the additional characteristics not explicitly covered by the Public Sector Equality Duty). Although implemented in Scotland, the UK Government has not commenced the duty in England – so local authorities are not bound by it. However, the council is committed to treating everyone equally regardless of socio-economic status and will work to eliminate discrimination and disadvantage caused by a person's socio-economic status

- c) Take a zero-tolerance approach to hate crime, investigate and work in partnership with the Police and Victim Support when hate incidents are reported to the council.
- d) Celebrate diversity and support campaigns for greater equality and awareness.
- e) Make equality and consideration of diversity a part of our everyday business.

5.2 Equality is the responsibility of every councillor, employee of Cheltenham Borough Council, and any other person or organisation employed by the council to work or to deliver services on its behalf, including those employed through contractual, commissioning or grant-aided arrangements.

5.3 Equality, diversity and inclusion are central to the decisions we make on how to deliver the best possible outcomes for our communities at a time of considerable financial challenge for the local authority. We will continue to use our limited resources smartly and our workforce will continue to maintain high standards in policy making, employment practice and service delivery to support all those who live, learn, work in or visit Cheltenham in the most effective and efficient way possible, to tackle inequality and discrimination and promote equality, diversity and inclusion in all that we do.

5.4 The council is also committed to being a fair and supportive employer, developing the skills and talent within our workforce so that employees are able to deliver high quality services to everyone.

5.5 The Council is committed to raising awareness across the workforce by providing Equality, Diversity and Inclusion training to all colleagues and third parties who represent the organisation.

5.6 Our EDI Advocates make sure that the issues or groups they support are considered when making council policies and decisions. They give a voice to underrepresented groups or important issues.

6. How we will support our commitment to equality, diversity and inclusion

6.1 The council as a community leader will:

1. Comply with and embrace equality law and good practice, which includes carrying out our public sector duties to promote equality
2. Regularly monitor and assess the impact of our policies, services and functions to ensure they are fair and reflect people's different needs and opinions
3. Use our influence with our partners and businesses to generate opportunities in the borough

4. Celebrate diversity and support campaigns for greater equality and awareness
 5. Make equality and consideration of diversity a part of our everyday business. To do this we will expect all our councillors, employees and contractors to:
 - a) Treat everyone with courtesy, dignity and respect at all times.
 - b) Provide the best possible standards of service and value for money to residents and communities.
 - c) Consider the needs and opinions of every community.
 - d) Facilitate the use of pronouns in our communications.
 6. Promoting diversity, preventing inequality and tackling discrimination is not solely the responsibility of the council. We will also work with wider partnerships to promote an equal and inclusive approach across the whole of the Borough
- 6.2 We cannot reduce inequality alone and so we ask all our residents, communities, service users and partners to support us by also committing to treating council employees, elected members, and all those who live in, work in, learn in or visit Cheltenham with respect and fairness.
- 6.3 We ask that:
- a) Service users do not use language or physical actions of any form that could demean, distress or offend council employees or elected members. Threats of violence against a member of staff, an elected member or our partners will not be tolerated. Legal action may be taken against any person using or threatening violence.
 - b) Cheltenham's residents and visitors treat each other with mutual respect and open mindedness. It is important to respect different religions, cultures, beliefs and lifestyles.
 - c) Cheltenham's residents and visitors continue to demonstrate respect and tolerance for others when using online forums. Threatening or abusive language is not acceptable online or in person.
- 6.4 The council as a service provider and commissioner will:
- a) Provide guidance to employees about how to include equality, diversity and inclusion in procurement and commissioning processes
 - b) Consider equality of access in service delivery
 - c) Routinely carry out an equality impact assessment (EQIA) to consider the impact that any prospective changes to policy or service delivery may have on different protected groups and take action to mitigate against any unequal impact. This process will also be used to ensure we are taking every opportunity to advance equality
 - d) Ensure contractors, suppliers and partners are aware of what the council expects in relation to equality, diversity and inclusion and understand that they

must provide services that are free from harassment, discrimination, or victimisation

- e) Ensure that the tendering processes include equality, diversity and inclusion as part of the selection criteria

6.5 We ask that:

- a) All contractors and suppliers ensure that they are aware of the council's commitment to equality, diversity and inclusion (EDI) and take responsibility for promoting EDI and challenging discrimination

6.6 The council as an employer will:

- a) Be an organisation where local people choose to work and develop good careers, where employees from different backgrounds work together harmoniously and productively and everyone feels valued
- b) Use policies and practices that demonstrably enable employees to fulfil their potential and progress within our organisation
- c) Tackle unacceptable behaviour in the workplace
- d) Reward all employees fairly and provide employment conditions which support them to do a good job
- e) Regularly review and update the council's human resources policies (including those relating to recruitment, learning and development and employee relations) to ensure that they are inclusive and accessible for all employees, regardless of protected characteristics
- f) Provide reasonable and timely adjustments for employees to allow them to work effectively and access any services or support they may require
- g) Promote a good work-life balance and opportunities to work flexibly
- h) Support disabled employees by making reasonable adjustments
- i) Monitor and publish the make-up of our workforce as required by the specific public sector equality duty
- j) Provide training and support to enable employees to manage and/or work within a diverse workforce
- k) Address any unfair treatment in the workplace relating to any of the protected characteristics

6.7 The council's Leadership Team will be responsible for overall management and direction of its equality, diversity and inclusion commitments.

6.8 We ask that:

- a) All managers ensure that equality, diversity and inclusion are core to service delivery, employee management and employee wellbeing, evidenced by discussions in annual appraisals

- b) All employees ensure that they are aware of the council's commitment to equality, diversity and inclusion (EDI) and take responsibility for promoting EDI and challenging discrimination.

7. Equal Access to Housing services and support

- 7.1 Cheltenham Borough Council is committed to ensuring that every tenant can access safe, fair and inclusive housing services. We believe everyone should be treated with dignity and respect and have equal opportunities to secure and sustain a home, regardless of their background or protected characteristics.
- 7.2 How we provide fair accessible housing services:
- Work closely with partners and agencies to make sure people who may be at risk of discrimination or disadvantage receive the right support.
 - Applying our Housing Options Protocol to ensure consistent and fair decision-making.
 - Working with specialist services to provide tailored help where needed. Our approach supports the council's legal duty to eliminate discrimination, advance equality of opportunity and foster good relations.
 - Through projects such as Housing First, we offer intensive, person-centred support to people who face multiple barriers to accessing stable housing. We also work with countywide partners to ensure places of safety for people fleeing domestic abuse or violence, recognising that everyone has the right to live free from harm.
- 7.3 We are committed to ensuring that residents with protected characteristics receive timely, reasonable adjustments and accessible support so they can live in their homes as easily and confidently as anyone else. Our partnerships with community and specialist services help us remove barriers, challenge discrimination and promote inclusion across all our housing services
- 7.4 **Our Community EDI Achievements:** CBC's Community Investment Team use IMD data, local insight and customer feedback to deliver community projects that support our commitment to equality and inclusion across the town.
- 7.5 Promotion- we use accessible language and do targeted promotion to harder to reach groups
- 7.6 Partnerships- we work with partners, such as inclusion Gloucestershire and Barnwood Trust to exchange expertise.
- 7.7 Venue- we use accessible venues and support tenants with transportation. We work with partners to bring their services to the heart of our communities.
- 7.8 Feedback- we gather regular feedback at our sessions

- 7.9 Targeted projects to address specific needs- such as Men’s group, Inclusion hub, Health and Wellbeing project,
- 7.10 Some of the projects within the community include:
- Mild learning difficulties training project with the Training and Employment Team
 - the Art Therapy Project around healthy relationships for Inclusion Hub
 - Graffiti project targeted at young, isolated people 18 plus at Scott and Edward Wilson House
 - Gardening groups across the town which support people with mental ill health including Monkscroft Action Group, St Pauls Hub, Popes Close and Bush court gardening groups.
 - Working in partnership with Cheltenham Welcomes Refugee’s to encourage community Inclusion.
 - The CBC Training and Employment team provide support and training often targeting hard to reach groups to support with literacy skills training volunteering and apprenticeships.
 - The CBC Benefits and Money Advice team provide support for people who are impacted and discriminated against because of their socioeconomic status.

8. Using data to inform our work – making fair decisions

- 8.1 Every day, decisions are made within the council that affect the lives and relationships of local people, service users and employees. Equality analysis and impact assessments will be used as a tool to help us make fair, sound and transparent decisions that are based on a robust understanding of the needs and rights of the groups and individuals who may be affected.
- 8.2 The council’s assessment process ensures that equality analysis is exercised in such a way that influences the final decision. It will also be used to identify positive actions that will mitigate any negative effects of our decisions or enhance any benefits for protected groups and others at risk of disadvantage.

Equality Impact Assessment in Regulatory Decision Making (Planning and Licensing)

- 8.3 An equality assessment (whether through the planning process, prescribed screening or a full Equalities Impact Assessment) is a tool to enable decision makers to consider the needs and effects of a particular planning application on people with protected characteristics. Equality assessments (EqIA/screening) enable openness, transparency and early engagement in the development process.
- 8.4 Screening identifies planning applications that are likely to have an impact on protected characteristics and helps to draw considerations of equality into the decision-making process for planning and licensing applications. It is one of the

methods by which the necessary level of “due regard” is demonstrated as being paid to the statutory equality duty.

- 8.5 Screening should be proportionate to enable the Council to assess the level of relevance that a proposed development/licence has to the statutory duty not to discriminate and to the public sector equality duty (i.e. the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality 2010 Act, advance equality of opportunity between people who share a protected characteristic and those who do not and to foster good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding) and should enable consideration of removing or minimising disadvantages suffered by people due to their protected characteristics, making reasonable adjustments to meet the needs of people from protected groups where these are different from the needs of other people, including steps to take account of disabled persons' disabilities, and encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- 8.6 Screening must be considered by the decision maker before and at the time that a particular decision is being considered, and not afterwards.
- 8.7 When considering planning or licensing applications, the Local Planning Authority/Council as part of the determination process gathers information it requires to assess and determine the application, including the relevant equality impacts or opportunities, and where it has received sufficient information, will determine the impacts on equality if any as part of the application process.
- 8.8 Where the application process does not provide an adequate means of gathering information regarding equality impact or opportunity, the application will be screened in accordance with the Council's prescribed manner and processes for screening applicable at the time.
- 8.9 Where appropriate in accordance with the screening exercise, an EqIA will be undertaken regarding the relevant planning application.”

Benchmarking

- 8.10 We will aim to benchmark our approach using the following resources:
- The council participates in Local Government Association (LGA) peer reviews. The feedback from the LGA peer reviews is used to improve our approach to equalities, diversity and inclusion in the workplace and to the services we provide

- The council is a Disability Confident employer, and we aim to use our staff equality monitoring data to benchmark ourselves against other district councils

Equality information

- 8.11 Whenever relevant to do so we will collate, analyse, interpret and publish information about equality and diversity in the workforce, service delivery and our communities. This information will be used in equality analysis to:
- Inform our service planning, policy development and decision-making process
 - Understand the impact of policies, practices and decisions on people with different protected characteristics, and to plan them more effectively
 - Help identify key equality issues
 - Develop and monitor our equality objectives
 - Identify ways of improving performance
 - Demonstrate compliance with the Equality Duty
- 8.12 When we ask employees and service-users to provide information about their personal characteristics, this will only be done where the information is relevant to the aims of the equality duty – for example if there are known inequalities in relation to a particular outcome or service. The council will always make it clear that disclosure of sensitive information (e.g., sexual orientation, gender orientation, religion, or belief) is optional and not compulsory.
- 8.13 However, without gathering some form of evidence, it may be difficult to monitor the impact of policies and procedures on certain protected groups. The council will aim to overcome this by creating a culture of trust whereby individuals are comfortable disclosing such information.
- 8.14 The council will uphold its duty to protect an individual's right to privacy and will not publish information that could identify an individual. Nor will the information be used to identify an individual or make a decision about them purely on the grounds of the information that has been provided in relation to their protected characteristics.

Cheltenham borough council – equality data

- 8.15 Inform Gloucestershire provides a valuable source of information about the people of Cheltenham borough. It has an interactive website designed to provide a 'one stop shop' of information and holds information profiles for the whole of Gloucestershire and snapshots of each of the boroughs electoral wards including protected characteristics of the borough. The protected characteristics for Cheltenham can be found at:

<https://www.gloucestershire.gov.uk/inform/equality-and-diversity/interactive-report/>

9 Making our services accessible and easy to use

- 9.1 We constantly strive to deliver services that are easily accessible by all who need them, and to support people to participate in public life. This in turn will help us achieve our duty to foster good relations between different groups and individuals. We are committed to listening to our residents, service users and customers to develop an understanding of how we can break down barriers and better meet their needs. This may involve making adjustments to the way we deliver services where it is reasonable to do so.
- 9.2 We will make sure that everyone has the information they need about our services. We will aim to provide all information in plain English and will provide alternative formats on request.
- 9.3 We are committed to engaging effectively with local people, community groups and other stakeholders. We will actively seek their views about the council and the services they receive, as well as involving them in shaping services and local decision making.

10 Protecting people

- 10.1 Safeguarding children, young people and vulnerable adults is everybody's business, wherever they work and whatever they do for the council. This includes staff, elected members and people who work for organisations that provide services on behalf of the council. We will endeavour to ensure all employees and elected members are aware of our safeguarding responsibilities and receive the appropriate training in safeguarding awareness.
- a. The council is committed to working in partnership to ensure that hate crime is not tolerated within our communities and neighbourhoods. Hate crime is motivated because of prejudice, hostility or hatred towards a person, family or groups because of their sexuality, gender identity, disability, ethnicity, religion or faith. It can include physical attacks to either a person or their property, threats, verbal abuse and insults. Nobody should suffer because of who they are, and nobody should put up with it. We aim to continue to encourage and promote trusting relationships giving people to confidence to speak up when they feel they have been a victim of hate crime or other forms of abuse.
- b. We are also working with our partners to tackle domestic abuse and sexual violence and have developed a county wide strategy to ensure that all residents in the borough have a fundamental right to live their lives in an

environment which will not tolerate domestic violence, will support victims/survivors and will hold perpetrators accountable for their actions.

11 Implementing this policy

- 11.1 The Council recognises that leadership, ownership and commitment by elected members and staff, with adequate resources allocated, are essential for this policy to be effective.
- 11.2 We understand that identifying and taking action is a key to mainstreaming equality and we will therefore deliver our commitments through our equality action plan.

12 Governance

- 12.1 Once formally agreed this policy will form part of the Council's policy framework.

Councillors represent the views of their communities and bring their views into the council's decision-making process in their role as community leaders.

The Leadership Team will provide visible leadership on equality ensuring it is embedded into policy, strategy, service delivery, our culture and behaviours as well as ensuring that the Council is meeting its duty under the Act.

A lead director will working with our Equality, Diversity and Inclusion Advocates group to oversee the delivery of the equality action plan and will report to the leadership team and councillors on performance and progress.

All members of our workforce are responsible for delivering services, working with our communities and working with one another in accordance with the council's policies and procedures in regard to tackling inequality and promoting equality, diversity, and inclusion. Senior officers throughout the council are responsible for ensuring that everyone who works for Cheltenham Borough Council follows this policy in all aspects of their work.

13 Monitoring and review

- 13.1 This equality, diversity and inclusion policy will be periodically reviewed and updated to reflect changing needs, new strategies or organisational restructure.
- 13.2 Progress in delivering on our equalities objectives will be subject to ongoing review and the objectives themselves will be reviewed and updated in line with the Public Sector Equality Duty.

- 13.3 Progress made towards achieving our equalities objectives will be assessed annually by the Leadership Team.
- 13.4 As part of our Public Sector Equality Duty, we will publish equalities information, including progress on equalities targets; and include our workforce review which outlines the makeup of our workforce by ethnicity, age, disability and gender. The information will show how these groups are represented across different pay scales and includes the annual gender pay gap report.
- 13.5 Equality impact assessments (EQIAs) are used to monitor the equality impact of all key decisions, including by assessing whether groups are disproportionately affected by changes to policy or services and identifying action we will take as a result to mitigate this.

14 Roles and Responsibilities

- 14.1 Equality is the responsibility of every Councillor, employee of, Cheltenham Borough Council and any other person or organisation employed by the Council to work or to deliver services on its behalf.
- Elected Members: Should ensure EDI is considered in policy and decision-making processes.
 - Chief Executive and Senior Leadership Team (SLT): Accountable for delivering equality objectives across all services.
 - EDI Advocates Group: Comprising cross party councillors and officers and CBC colleagues Advocates group will oversee this policy and monitor the extent to which we are achieving our commitments.
 - Policy and Governance Team: Support the delivery of the EDI Policy, report on progress made against the annual action plan and ensure equality initiatives, such as EIAs, are embedded in project management and council decision making.
 - HR: Lead efforts to promote a diverse workforce, ensure inclusive recruitment practices, and monitor representation.
 - Procurement team: Ensure suppliers meet EDI objectives and implement fair practices.

15 Acting when things go wrong

- 15.1 As a council we aim to apply the highest equality and inclusion standards, however, despite the best intentions sometimes things can go wrong.
- 15.2 People have the right to complain about either a service they have received from us, a contractor that provides services on our behalf, or their experience in the workplace. The council has a formal complaints procedure for service users and a grievance procedure for employees.

- 15.3 The council takes all complaints seriously and actively encourages people to voice their concern when things go wrong, so that the issue can be addressed and lessons can be learnt. Responding to and learning from complaints will form a key part of the council's drive for better local services.
- 15.4 We do not tolerate unlawful discrimination, harassment or victimisation and will take decisive and appropriate action against people found in breach of this policy. Employees found in breach of this policy may be liable to disciplinary action including dismissal.

Thank you for taking the time to read our equality, diversity and inclusion policy; we hope you found it interesting.

If you would like to find out more about our plans and services, how we are doing and how to get involved, please visit our website www.cheltenham.gov.uk

Useful links and reference

[Equality Framework for Local Government | Local Government Association](#)

[Equality Act 2010: guidance - GOV.UK](#)

[Disability rights: Overview - GOV.UK](#)

[Homepage | Stonewall](#)

[Pride in Gloucestershire](#)

[Neurodiversity Support UK](#)

[Refugee Support | Gloucestershire County Council](#)

Appendix 1 – Glossary

A

Accessibility: The design, development or state of physical or digital environments, resources and services that are easy to reach, enter, use, see, etc. for all users.

Age: This refers to a person having a particular age (for example, 32-year-olds) or being within an age group (for example, 18–30-year-olds).

B

Belief: see Religion and belief

Bi: An attraction towards more than one gender. Bi people may also describe themselves as bisexual, pansexual, bi-curious, queer, and other non-monosexual identities.

Bi-cultural: Bicultural identity is the condition of being oneself regarding the combination of two cultures.

Bias: Systematic patterns where our brains stray from rationality in judgment which can result in attitudes for or against a person, group or concept especially in a way considered to be unfair.

Black: A broad term for all people with ethnic origins in the African continent. Less commonly this term is used to refer to all people around the world who are not of white European descent. Note that we encourage capitalising Black (when you are talking about race).

Black Lives Matter: A political and social movement originating among African Americans, emphasizing basic human rights and racial equality for Black people and campaigning against various forms of racism. Abbreviations: BLM, B.L.M.

BME, BAME ME: An acronym that stands for black [and Asian] & minority ethnic. Though generally accepted, as with people of colour (see below), there's been some pushback to these terms in recent years for being too reductionist and too inclusive. By reductionist we mean it reduces the nuanced and complex experiences of an individual to an overly simplistic, broad term. Minority Ethnic (ME). Is less common but has been used in recent Scottish government policy documents in relation to EDI.

C

Civil partnership: Legal recognition of a same-sex couple's relationship. Civil partners must be treated the same as married couples on a range of legal matters.

Cisgender / cis

A term that can be used to describe people whose gender identity corresponds to the sex registered at birth. Non-trans or not transgender can also be used.

D

Direct discrimination: This refers to less favourable treatment because of a person's protected characteristic.

Disability: A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Diversity: Diversity is recognising and valuing that individuals are unique each having their own values, beliefs, attitude, culture, racial background, sexuality, skills and life experience.

E

Engagement: A broad term, intended to cover the whole range of ways in which public authorities interact with their service users and their employees, over and above what they do in providing services or within a formal employment relationship.

Equality: Equality means treating everyone with fairness and respect and recognising the needs of individuals.

Equality analysis: Equality analysis involves looking at your equality information and the outcome of your engagement in order to understand the effect or potential effect of your decisions on different protected groups. The general equality duty does not specify how public authorities should analyse the effect of their policies and practices on equality.

Equality information: The information that you have (or that you will collect) about people with protected characteristics that will help you to show compliance with the equality duty.

This will include the findings of engagement with protected groups and others and the effect of your policies on protected groups. It includes both qualitative and quantitative information, as well as evidence of analysis you have undertaken.

Equality objectives: A requirement to prepare, set and publish objectives is one of the specific duties set out under the equality duty. An authority's objectives should aim to further one or more aims of the equality duty.

Equality outcome: The results that individuals or groups actually achieve and are able to benefit from. For example, equal pay between men and women.

F

Fostering good relations: The Equality Act 2010 states that having due regard to the need to fostering good relations involves having due regard, in particular, to the need to tackle prejudice and promote understanding between people who share a protected characteristic and those who do not.

Function: The full range of a public authority's activities, duties and powers.

G

Gender reassignment: This is the process of transitioning from one sex to another. See also trans, transgender, transsexual.

Gender or Gender identity

Often expressed in terms of masculinity and femininity, gender is largely culturally determined and is assumed from the sex assigned at birth. A person's gender identity is an innate sense of their own gender, which may or may not correspond to the sex assigned at birth. (Source: Stonewall: List of LGBTQ+ Terms)

Gender neutral

Often used to refer to non-gendered facilities (e.g. gender neutral toilets) as well as non-discriminatory, neutral language that may be used instead of gendered language and pronouns. For example, when referring to people, gender neutral language would tend to use 'they', 'them' or 'their' rather than 'she/he', 'hers/his' etc. (Source:

General duty: The requirement to show due regard to the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.; advance equality of opportunity between people who share a protected characteristic and

those who do not; and to foster good relations between people who share a protected characteristic and those who do not.

Global Majority: shortened version of the term 'people of the global majority', used to refer to all ethnic groups except white British and other white groups, including white minorities. This includes people from black, Asian, mixed, and other ethnic groups who are often racialised as 'ethnic minorities'.

H

Harassment: Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may also involve unwanted conduct of a sexual nature or be related to gender reassignment or sex.

I

Inclusion: Inclusion is the result of welcoming, respecting, supporting, involving, valuing and empowering those around you equally.

Indirect discrimination: This is when a provision, criterion or practice is applied in a way that creates disproportionate disadvantage for a person with a protected characteristic as compared to those who do not share that characteristic and is not a proportionate means of achieving a legitimate aim.

Intersectionality

A theory coined by Kimberlé Crenshaw, an American civil rights activist, intersectionality refers to the intertwining of social identities like gender, race, ethnicity, social class, religion, sexual orientation or gender identity that causes unique opportunities, barriers, experiences or social inequality

L

Learning disabilities and learning differences

A learning disability is a reduced intellectual ability and difficulty with everyday activities which affects someone for their whole life.

People with a learning disability tend to take longer to learn and may need support to develop new skills, understand complicated information and interact with other people.

LGBTQ+

Acronym for lesbian, gay, bisexual, transgender, and queer. The Q generally stands for queer when LGBTQ organizations, leaders, and media use the acronym.

M

Marriage: a formal union and social and legal contract between two individuals that unites their lives legally, economically, and emotionally.

Maternity: The period after giving birth. It is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.

Mitigation: This is when measures are put in place that lessen the negative effects of a policy or policies on protected groups. For example, delivering a service by telephone alone may cause problems for those with a language barrier. Rather than changing the way the service is delivered, this could be mitigated by using telephone interpreting services.

Marginalised

A term to describe communities that may have societal disadvantages placed upon them, often based on their identity or social class.

Minority ethnic

Minority ethnic refers to individuals and groups who are in the minority within a larger population based on certain characteristics and who are often subject to differential treatment.

Misgendering

Misgendering' is the term used when someone refers to a trans person using terms linked to the gender they were assigned at birth, instead of their real gender (for example by using terms like 'man', 'woman' or using pronouns incorrectly).

N

Neurodiversity / neurodivergent

Being neurodivergent means that an individual may think and learn in a different way to others. Neurodiversity has a wide spectrum that covers a range of hidden neurological conditions, such as but not limited to autism spectrum, dyslexia, dyspraxia, ADHD, Tourette's and social anxiety.

Nonbinary / gender non-conforming

These are broad terms used by and to refer to some people who experience their gender identity and/or gender expression as falling outside the binary categories of man and woman.

P

Positive action: Lawful actions that seeks to overcome or minimise disadvantages that people who share a protected characteristic have experienced, or to meet their different

needs (for example, providing mentoring to encourage staff from under-represented groups to apply for promotion).

Pregnancy: The condition of being pregnant.

Protected characteristics: The equality duty covers the following characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These are also referred to as protected groups. The duty also covers marriage and civil partnerships, but not for all aspects of the duty.

Protected groups: see Protected characteristics above

Public authority: The general equality duty applies to public authorities. For this purpose, a public authority is a body that is named (listed) or described in Schedule 19 of the Equality Act. It also applies to other organisations who exercise public functions. This includes private bodies or voluntary organisations which are carrying out public functions on behalf of a public authority. Public functions: The Equality Act 2010 defines a public function as a function that is of a public nature for the purposes of the Human Rights Act 1998.

R

Race: This is the protected characteristic of race. It refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins.

Reasonable adjustment: Public authorities making adjustments to the way in which they carry out their functions so that disabled people are not disadvantaged by the way in which those functions are carried out. This is with regard to policies, practices or procedures, premises, and the provision of auxiliary aids or services.

Relevance: How far a function or policy affects people, as members of the public, and as employees of the authority. Some functions may be more relevant to some protected groups than to others, and to one or more of the three elements of the general equality duty. The function or policy may still be relevant if the numbers affected by it are very small.

Religion or belief: Religion means any religion, including a reference to a lack of religion. Belief includes religious and philosophical beliefs including lack of belief (for example,

Atheism). Generally, a belief should affect your life choices or the way you live for it to be included

S

Seldom Heard: The term 'seldom-heard groups' refers to under-represented people who use or might potentially use services and who are less likely to be heard by these service professionals and decision-makers. These groups used to be described as hard to reach – suggesting that there is something that prevents their engagement with services. Seldom heard emphasises the responsibility of agencies to reach out to excluded people, ensuring that they have access to services and that their voices can be heard, and is preferred for those reasons.

Examples of seldom heard groups could include:

- Particular ethnic minority groups
- Carers
- People with disabilities
- Lesbian, Gay, Bisexual, Transgender, and Queer people
- Refugees/asylum seekers
- People who are homeless
- Younger people
- People with language barriers

To summarise, it is anyone who is under-served. These people may have particular needs when it comes to participating.

Sex: Someone being a man or a woman.

Sexual orientation: This is whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Specific duties: Certain public authorities named or described (listed) in Schedule 1 of the Equality Act 2010 (Statutory Duties) Regulations 2011 are required to comply with certain specific duties. These duties are intended to assist authorities in complying with the general equality duty.

Stakeholders: People with an interest in a subject or an issue who are likely to be affected by any decision relating to it and/or have responsibilities relating to it.

Statutory Code of Practice: A document which offers practical guidance on the law, has been approved by parliament and is admissible as evidence in a Court of law.

Sensory disability

A sensory disability is a disability of the senses (for example, sight, hearing, smell, touch, taste)

Systemic/ structural / institutional racism

Systemic/structural/institutional racism refers specifically to the ways in which institutional policies and practices create different outcomes for different racial groups

T

Trans: The terms 'trans people' and 'transgender people' are both often used as umbrella terms for people whose gender identity and/or gender expression differs from their birth sex, including transsexual people (those who propose to undergo, are undergoing or have undergone a process of gender reassignment to live permanently in their acquired gender), transvestite/cross-dressing people (those who wear clothing traditionally associated with the other gender either occasionally or more regularly), androgyne / polygender people (those who have non-binary gender identities and do not identify as male or female), and others who define as gender variant.

Transgender: An umbrella term for people whose gender identity and/or gender expression differs from their birth sex. They may or may not seek to undergo gender reassignment hormonal treatment/surgery. Often used interchangeably with trans.

Transsexual: A person who intends to undergo, is undergoing or has undergone gender reassignment (which may or may not involve hormone therapy or surgery). Transsexual people feel the deep conviction to present themselves in the appearance of the opposite sex. They may change their name and identity to live in the preferred gender. Some take hormones and have cosmetic treatments to alter their appearance and physical characteristics. Some undergo surgery to change their bodies to approximate more closely to their preferred gender. Transsexual people have the protected characteristic of gender reassignment under the Equality Act 2010. Under the Act, gender reassignment is a personal process rather than a medical one and it does not require someone to undergo medical treatment in order to be protected.

V

Victimisation: Subjecting a person to a detriment because they have made a complaint of discrimination or are thought to have done so; or because they have supported someone else who has made a complaint of discrimination. Victimisation is unlawful under the Equality Act 2010.

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Cheltenham Borough Council

Cabinet – 17 March 2026

Housing Payments - Crisis and Resilience Fund Policy

Accountable member:

Councillor Peter Jeffries, Cabinet Member Finance and Assets

Accountable officer:

Jayne Gilpin, Head of Revenues and Benefits

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

The council has powers to award Discretionary Housing Payments (DHP) to provide additional financial assistance towards housing costs where claimants are in receipt of Housing Benefit or the housing element of Universal Credit. Funding is received from the Government. Discretionary Housing Payments will end on 31st March 2026 and will be replaced by the Housing Payment strand in the Crisis and Resilience Fund. Approval is being sought to replace the existing Discretionary Housing Payments policy with a new Housing Payment – Crisis and Resilience Fund Policy.

Recommendations: That Cabinet:

- 1. approves the Housing Payments - Crisis and Resilience Fund Policy in Appendix 4**
- 2. delegates decisions relating to the award of Crisis and Resilience Fund Housing Payments, in line with the policy and DWP guidance, to the Head of Revenues and Benefits and designated officers within the Benefits team, with the final decision in the event of dispute being taken by the Section 151 Officer.**

- 3. authorises the Section 151 Officer to apply to Ministry for Housing, Communities and Local Government (MHCLG) for an accounting direction if it appears that the annual allocation will be exceeded in any financial year.**
-

1. Implications

1.1 Financial, Property and Asset implications

The Crisis and Resilience Fund Housing Payments Scheme enables local authorities to provide financial assistance towards housing costs through the General Fund. Government provides grant funding each year and has confirmed Cheltenham will receive £106,443 in each of the years 2026/27 and 2027/28. The Council has the option to add this amount by up to a maximum of two-and-a-half times the grant allocation. Where due to demand Councils need to add to the funding, an application can be made to MHCLG for a specific accounting direction which would allow any payments made to its own tenants to be paid from the Housing Revenues Account (HRA) rather than from the General fund. It is recommended that the level of payments continue to be monitored and the S151 Officer is authorised to apply for such a direction if it appears probable that the annual allocation will be exceeded in any financial year.

The Government also provides funding each year to cover administration costs

Signed off by: Jon Whitlock, Head of Finance jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

The Ministry of Housing, Communities and Local Government is providing funding to Authorities under Section 31 of the Local Government Act 2003, to administer The Fund. Authorities have discretion on exactly how this funding is used within the scope set out in the Crisis and Resilience Fund: Guidance for local authorities in England (1 April 2026 to 31 March 2029) guidance issued by the Department for Work and Pensions and updated in January 2026 (“the Guidance”).

Signed off by: Alison McKane, Deputy Monitoring Officer
alison.mckane@cheltenham.gov.uk

1.3 Environmental and climate change implications

There are no environmental and climate change implications associated with this report. The Climate Impact Assessment Tool has been completed to demonstrate the social benefits. This is attached as appendix 3.

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
- Taking Care of your money

1.5 Equality, Diversity and Inclusion Implications

There are no implications directly from arising from this report. An equality impact assessment is in Appendix 2

1.6 Performance management – monitoring and review

The number and category of housing payments are monitored on a monthly basis and reported to the Department for Work and Pensions periodically. The effectiveness of the policy will be kept under constant review and the policy will be updated as required.

2 Background

2.1 The Discretionary Housing Payment (DHP) scheme has operated since 2001 to provide additional help with housing costs for recipients of Housing Benefit or Universal Credit where the award includes an element for housing costs. The Discretionary Financial Assistance Regulations 2001. provides the broad discretion and the Department for Work and Pensions (DWP) provides formal guidance which sets out how schemes should be administered.

2.2 From April 2026 the Crisis and Resilience Fund replaces the Household Support Fund and DHPs will be replaced by the Housing Payment strand of the Crisis and Resilience Fund. The Housing Payment will very closely replicate the current DHP guidelines and will transition in a phased approach over 3 years.

2.3 Housing payments will replicate the current DHP arrangements in 2026/27 and 2027/28 and funding will be at the same level as 2025/26, which for Cheltenham is £106,443.00. Responsibility for making Housing Payments will continue to be with the authority tier. In a two-tier area this means it will remain with, and funding will be provided to, the District Council.

2.4 Gloucestershire County Council will receive the remainder of the Crisis and Resilience Fund and be responsible for providing appropriate financial support to residents from that scheme.

2.5 Housing payments will be fully integrated into the Crisis and Resilience fund from

year 3, 2028/29, and funding will be provided to Unitary or County Councils.

2.6 The phased approach allows time for authorities to plan effectively and adapt systems and processes, ensuring that crucial housing support can continue to be delivered without disruption to those in need to sustain tenancies and prevent homelessness.

2.7 As Discretionary Housing Payments will end approval is being sought to replace the existing policy with a new Crisis and Resilience Fund Housing Payments Policy.

3 Crisis and Resilience Fund Housing Payments

3.1 Housing Payments will replicate DHPs and will continue to be administered in line with the Guidance and the policy in appendix 4.

3.2 Payments can be made only to those residents

- who are entitled to Housing Benefit (HB); or
- Universal Credit (UC) housing; and
- have a rental liability; and
- require further financial assistance with housing costs

3.3 Like DHPs, Housing Payments are discretionary and there is no statutory right to a payment. The policy in appendix 4 supports the decision-making process, ensuring that fair and consistent decisions are made when considering applications and that financial support towards housing costs goes to those most in need of financial assistance.

3.4 To avoid confusion, the website and online applications will continue to include the wording formerly used, i.e. Discretionary Housing Payments.

4 Reasons for recommendations

4.1 The Housing Payments - Crisis and Resilience Fund policy in appendix 3 is required so that financial support can continue to be paid to eligible residents.

4.2 Some minor changes have been made to the policy to update wording where appropriate and to clarify that Armed Forces Compensation Payments will be disregarded as income in applications.

5 Alternative options considered

5.1 None. The Council is expected to administer the new Crisis and Resilience Fund

Housing Payments which replicate Discretionary Housing Payments and the policy sets out the basis for making consistent and fair awards.

6 Consultation and feedback

6.1 No consultation has been undertaken. The policy is being updated due to Discretionary Housing Payments being replaced by the Housing Payment strand of the Crisis and Resilience Fund.

7 Key risks

7.1 The risks are in appendix 1

Report author:

Jayne Gilpin, Head of Revenues and Benefits jayne.gilpin@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment – Screening
- iii. Climate Change Assessment
- iv. Draft scheme conditions for 2026/27

Background information:

1. The Discretionary Financial Assistance Regulations 2001
<http://www.legislation.gov.uk/uksi/2001/1167/contents/made>
2. (<https://www.gov.uk/government/publications/crisis-and-resilience-fund-guidance-for-local-authorities-in-england-1-april-2026-to-31-march-2029>)

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 Housing Payment - Crisis and Resilience Fund policy, to replace the discretionary Housing Payment policy is not approved Cheltenham residents who would be eligible to apply will not receive the financial assistance towards their housing costs	Jayne Gilpin	3	1	3	Accept	Monthly monitoring of awards made	Jayne Gilpin	Ongoing
	If Housing Payment awards are made in excess of the DWP funding the Council will be required to fund the excess	Jayne Gilpin	2	3	6	Avoid	Ongoing monitoring of the DHP budget throughout the year as part of internal controls. Authorise the S151 officer to apply for an Accounting Direction	Jayne Gilpin	09/02/2026

Appendix 2: Equality Impact Assessment (Screening)

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Jayne Gilpin	Service Area: Revenues and Benefits
Title: Head of Revenues and Benefits	Date of assessment: 09/02/2026
Signature: Jayne Gilpin	

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

Policy

If other, please specify:

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

Housing Payments - Crisis and Resilience Fund Housing Payments

Is this new or existing?

Is changing

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

The existing policy is Discretionary Housing Payments. This scheme is being replaced by the Housing Payment strand in the Crisis and Resilience Fund from April 2026 and the new policy needs to be implemented to reflect the change

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

Aims:	The Housing Payments - Crisis and Resilience Fund policy will replace the Discretionary Housing Payments from April 2026. The policy is broadly the same to reflect the name change
Objectives:	The Housing Payments - Crisis and Resilience Fund Policy will set out the basis for considering and awarding Housing Payments
Outcomes:	Crisis and Resilience Fund Housing Payments will provide financial support towards housing costs as detailed in the policy but will seek to <ul style="list-style-type: none"> Alleviate poverty

	<ul style="list-style-type: none"> • prevent homelessness • supporting people to secure sustainable and affordable accommodation • supporting people who out of necessity are temporarily occupying accommodation which is unaffordable from their benefits, such as foster carers between fostering placements • helping applicants through personal crisis and challenging life events
Benefits:	As above

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	Yes
Do you expect the impacts to be positive or negative?	Positive
Please provide an explanation for your answer:	
The policy ensures that eligibility criteria is applied fairly and consistently so that the most vulnerable residents including those with Protected Characteristics receive support	

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	Jayne Gilpin
Completion date for Stage Two assessment	18/02/2026

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

Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

<ul style="list-style-type: none">Any proposals to introduce or add to a service	<ul style="list-style-type: none">Any proposals to adopt policy priorities, strategies and plans
<ul style="list-style-type: none">Any proposals to remove, reduce or alter a service	<ul style="list-style-type: none">Changes to staffing structure where groups of employees are likely to be negatively affected
<ul style="list-style-type: none">Any new policies or changes to policies	<ul style="list-style-type: none">Any proposals in relation to procured or commissioned services

Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have been taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

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

a. Person responsible for this EqIA	
Officer responsible: Jayne Gilpin	Service Area: Revenues and Benefits
Title: Head of Revenues and Benefits	Date of assessment: 18/02/2026
Signature: Jayne Gilpin	

b. Is this a policy, function, strategy, service change or project?	Policy
If other, please specify:	

c. Name of the policy, function, strategy, service change or project	
Crisis and Resilience Fund Housing Payments	
Is this new or existing?	Is changing
Please specify reason for change or development of policy, function, strategy, service change or project	
The existing policy is Discretionary Housing Payments. This scheme is being replaced by the Housing Payment strand in the Crisis and Resilience Fund from April 2026 and the new policy needs to be implemented to reflect the change	

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?	
Aims:	The Crisis and Resilience Fund Housing Payments policy will replace Discretionary Housing Payments from April 2026. The policy is broadly the same and has been updated to reflect the name change
Objectives:	The Crisis and Resilience Fund Housing Payments Policy will set out the basis for considering and awarding Housing Payments
Outcomes:	<p>Crisis and Resilience Fund Housing Payments will provide financial support towards housing costs as detailed in the policy but will seek to</p> <ul style="list-style-type: none"> • Alleviate poverty • prevent homelessness • supporting people to secure sustainable and affordable accommodation • supporting people who out of necessity are temporarily occupying accommodation which is unaffordable from their benefits, such as foster carers between fostering placements • helping applicants through personal crisis and challenging life events

Benefits:	By implementing the policy the council will be able to continue to provide financial assistance with housing costs to those eligible to be considered and in need of support

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 policy ensures that eligibility criteria is applied fairly and consistently so that the most vulnerable residents including those with Protected Characteristics receive support

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	Jayne Gilpin
Completion date for Stage Two assessment	18/02/2026

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

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.

b. Consultation

Has any consultation be conducted?	No
------------------------------------	----

This is not required by the Council as previous consultation had been carried out by Central Government who oversee the guidance

--

3. Assessment

a. Assessment of impacts

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

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

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Neutral	There are no specific impacts to this group as a result of the proposed policy.	All ages of applicant can be considered
	Younger People (16-25)	Neutral	There are no specific impacts to this group as a result of the proposed policy	All ages of applicant can be considered
	Children (0-16)	Neutral	There are no specific impacts to this group Children cannot directly apply for an award	Applications from families with children can be considered
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	There are no specific impacts to this group as a result of the proposed policy	
	Sensory Impairment (sight, hearing)	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Mental health	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Learning Disability	Neutral	There are no specific impacts to this group as a result of the proposed policy	
GENDER REASSIGNMENT		Neutral	There are no specific impacts to this group as a result of the proposed policy	
MARRIAGE & CIVIL PARTNERSHIP	Women	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Men	Neutral	There are no specific impacts to this group as a result of the proposed policy.	
	Lesbians	Neutral	There are no specific impacts to this group as a result of the proposed scheme for 2025/26.	
	Gay Men	Neutral	There are no specific impacts to this group as a result of the proposed policy	
PREGNANCY & MATERNITY	Women	Neutral	There are no specific impacts to this group as a result of the proposed policy	
RACE* Further information on the breakdown below each of	White	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Mixed or multiple ethnic groups	Neutral	There are no specific impacts to this group as a result of the proposed policy.	

these headings, is available here . For example Asian, includes Chinese, Pakistani and Indian etc	Asian	Neutral	There are no specific impacts to this group as a result of the proposed scheme for 2025/26.	
	African	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Caribbean or Black	Neutral	There are no specific impacts to this group as a result of the proposed policy.	
		Neutral	There are no specific impacts to this group as a result of the proposed policy.	
RELIGION & BELIEF** A list of religions used in the census is available here	See note	Neutral	There are no specific impacts to this group as a result of the proposed policy.	
SEX (GENDER)	Men	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Women	Neutral	There are no specific impacts to this group as a result of the proposed policy.	
	Trans Men	Neutral	There are no specific impacts to this group as a result of the proposed policy.	
	Trans Women		There are no specific impacts to this group as a result of the proposed policy.	
SEXUAL ORIENTATION	Heterosexual	Neutral	There are no specific impacts to this group as a result of the proposed policy.	
	Lesbian	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Gay	Neutral	There are no specific impacts to this group as a result of the proposed policy	
	Bisexual/Pansexual	Neutral	There are no specific impacts to this group as a result of the proposed policy	
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Positive and negative	The scheme will consider the applicant's household, income and expenditure and each case will be treated on its own merits.	This is replicating the previous Discretionary Housing Payments scheme

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 92

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

Action	Target completion date	Lead Officer
No actions have been identified		

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
Jayne Gilpin	18/02/2026	1.0	

Health	2	Support with housing costs allows residents to continue to live in higher quality housing by reducing barriers to finance	0
Housing	0	Not applicable	0
Education	0	Not applicable	0
Community	0	Not applicable	0
Culture	0	Not applicable	0
Accessibility	4	Housing payments in the Crisis and Resilience Fund Payments provide vital financial assistance with housing costs for eligible residents in receipt of Housing Benefit or Universal Credit . The payments impact positively on their finances	0
Local Economy and Jobs	2	Housing Payments will provide eligible residents with additional help with housing costs	0
Safety	0	Not applicable	0
Equity	1	Eligibility is based on financial circumstances	0
Democratic Voice	-2	The policy is replacing an existing policy due to a change in Government policy	0

Cheltenham Borough Council

Housing Payments - Crisis and Resilience Fund Policy

Version control

Document name: Housing Payments - Crisis and Resilience Fund Policy
Version: 1.0

Responsible officer

- Jayne Gilpin, Head of Revenues and Benefits

Approved by:

Next review date: Not before policy ends on 31/03/2027 unless required by Government direction or for operational reasons

Retention period: 6 years

Revision date	Version	Description
date		

Consultees

Internal

- None

External

- N/A

Distribution

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1. Introduction and purpose of the policy

- 1.1 The Housing Payment (HP) scheme is designed to provide further financial assistance to recipients of Housing Benefit and Universal Credit where the housing costs element is included in their current award. It is payable where additional help with housing costs is required with awards being made under the Discretionary Financial Assistance Regulations 2001 which provide Local Authorities with broad discretion on the amount of money paid out and the way the scheme is administered.
- 1.2 The government has provided additional funding in recent years to enable local authorities to provide transitional support to customers affected by size criteria in the social housing sector, the benefit cap and changes to Local Housing Allowance but it is entirely at the Council's discretion as to how much is awarded in each area. In most cases a customer will need to demonstrate that they are unable to meet housing costs from their available income or that they have a shortfall in rent as a result of the welfare reforms.

2. Aims and scope of the policy

- 2.1 The aims of the Housing Payment policy is to set out Council's approach to considering applications for Housing Payments.
- 2.2 The policy will support the decision-making process and ensure that applications are considered fairly and consistently.

3. What Housing payments cover

- 3.1 HPs are intended to support people who are receiving Housing Benefit or Universal Credit within Cheltenham and need additional support to cover housing-related costs. Housing-related costs are:
- Rental liability as defined in the Housing Benefit and Universal Credit legislation
 - Lump sum payments for deposits or rent in advance where the applicant is moving to accommodation either inside or outside of the borough
 - Removal costs where the applicant is moving to accommodation either inside or outside of the borough.
- 3.2 Lump sum payments will be considered to help customers, where their current tenancy is unsustainable, to move to more affordable accommodation. In order to receive a lump sum payment, the customer must be receiving Housing Benefit or

Universal Credit (that includes a housing costs element) at their current address in Cheltenham.

3.3 What HPs do not cover:

- service or rental charges ineligible for Housing Benefit
- increases in rent due to outstanding rent arrears
- certain sanctions and reductions in benefit
- Council Tax liability

4. Principles governing the award of HPs

4.1 There is no statutory right to a HP as the scheme is discretionary.

4.2. The Council has formulated this policy having regard to the Crisis and Resilience Fund: Guidance for local authorities in England (1 April 2026 to 31 March 2029)

4.3. Within the above constraints, the Council's broad aim is to support people affected by welfare reform with a view to:

- alleviating poverty
- preventing homelessness
- supporting people to secure paid employment
- supporting people to secure sustainable and affordable accommodation
- supporting people who out of necessity are temporarily occupying accommodation which is unaffordable from their benefits, such as foster carers between fostering placements
- supporting young people and care leavers as they transition to adult life
- supporting people who are in unaffordable tenancies but cannot move to more affordable accommodation due to particular reasons such as health, disability or child protection
- supporting domestic violence victims who need to move to a place of safety
- helping applicants through personal crisis and challenging life events
- supporting applicants or their partners who are due to reach State Pension age which means they will no longer be subject to an under-occupation reduction
- assisting working age customers in receipt of UC where a dual liability for rent is unavoidable, including those who have fled their main home because they are a victim of domestic abuse

- supporting people who are refugees who need to maintain stability in their financial and housing circumstances
 - supporting disabled people who receive informal care and support in their current neighbourhood from family and friends, which would not be available in a new area. In this respect, you may also consider families who have a child with an impairment who rely heavily on local support networks
 - supporting the elderly or frail who have lived in the area for a long time and would find it difficult to establish support networks in a new area
 - supporting people with health or medical problems, either physical or mental, who need access to local medical services or support that might not be available elsewhere
 - supporting families with a social services intervention, for example highly dependent adults, children at risk or involvement in a family intervention project
 - supporting disabled people who need, or have had, significant adaptations made to their property, or where they are living in a property particularly suited to their needs. This includes properties which have been adapted for other members of the household, such as disabled children or non-dependants
 - supporting people with shared care arrangements; the person who does not receive the Child Benefit will not receive calculations for the children in their housing entitlement
 - supporting War Veterans by disregarding Armed Forces Compensation Scheme payments and War Disablement Pension when calculating a HP award
- 4.4. The length of time over which a payment is made is at the discretion of the Local Authority. The period of the award and, more importantly any specific end date should be made clear to the customer. HPs will not normally be used to provide long term support for individuals. They will be used to provide short term support to allow people the time to resolve their current financial difficulties and to move to a position which is financially sustainable for them in the longer term.
- 4.5. The Council may require customers to demonstrate that their housing costs are unaffordable having regard to all of their sources of income and savings by providing evidence of their income and outgoings.
- 4.6. HP customers will be expected to take personal action to mitigate the impact of welfare reforms on them. This action will normally include seeking paid employment and/or moving to more affordable accommodation and, where appropriate, to engage in obtaining personal advice to better manage their finances.
- 4.7. The Council may require customers to demonstrate that they have taken all options available to them before awarding a HP, for example, by providing evidence that they have applied for jobs, are seeking more affordable accommodation and have

sought advice on managing their finances. An award of HP may also be conditional on customers demonstrating that they are continuing to take such action.

- 4.8. The Council may require such claimants to demonstrate that there are barriers preventing them from moving to a financially sustainable position before awarding a HP, for example, by providing evidence of serious physical or mental health problems or disabilities or caring responsibilities.
- 4.9. The Council will, in particular, take into account evidence that the cost to the Council of available alternatives would be greater than the cost of awarding a HP.
- 4.10. As a general rule, a HP intended to address a shortfall in benefit to meet housing costs due to the benefit cap will be limited to a period of no more than one year. Additionally, a HP intended to address a shortfall in benefit to meet housing costs due to other temporary hardship will be limited to a period of no more than six months. However, these periods can be extended if the customer can demonstrate that their circumstances are exceptional.
- 4.11. Where a particular need for a HP has been demonstrated, the Council is not obliged to award a HP to cover the full shortfall between benefit and housing costs, or to award HP in respect of the whole period during which that shortfall is likely to continue. The Council may offer a lump sum, such as a rent deposit, in order to assist a claimant to move to more affordable accommodation however this will be restricted to one award in a twelve month period.

5. Applications for a Housing Payment

- 5.1 The Council will accept an application from the Housing Benefit or Universal Credit customer or somebody acting on that person's behalf, for example, an appointee. All claims for a HP must be made in writing using the prescribed application form, by the customer or their representative. If a customer has difficulties completing the form they should be encouraged to make a personal visit to the Council offices or be referred to an advice agency. Alternatively a visit to the customer's home can be carried out if considered necessary.
- 5.2 Each application will be considered on its own merits, taking into account relevant information provided by the customer in support of their application. If an award of a HP is made for a period, this will not mean that the award is automatically renewed at the end of the period. A full review of the customer's circumstances will be carried out prior to a further award being made.

6. Notification of decisions

- 6.1 The customer will be notified in writing of the outcome of the HP claim within 14 days of receipt of the claim and all supporting documentation, or as soon as possible after that. If a claim is unsuccessful, the Council's decision letter will include an explanation of how the decision has been reached and details of the right to request a review.
- 6.2 If the claim is successful, the Council's decision letter will include the following:
- the reason for the award
 - the amount awarded
 - the period of the award
 - who will be paid the HP
 - the customer's duty to report any changes in circumstances
 - any conditions associated with the award
 - details of the right of review

7. Backdating a Housing Payment

- 7.1 The Council will consider any reasonable request for backdating a HP award. However, these will be limited to the period in which the customer has been receiving Housing Benefit or Universal Credit during the current financial year unless exceptional reasons for a late claim are accepted. Backdating cannot cover arrears accrued while not in receipt of these benefits.

8. Method of payment

- 8.1 The Benefits Service will decide on the most appropriate person to pay and the method and timing of payments based on the particular circumstances of each case. Where a HP is awarded in respect of council rental liability any HP will be credited to the relevant housing rent account and where a HP is awarded as a lump sum payment for rent in advance or a deposit, payment may be made direct to the landlord.

9. Changes in circumstances

- 9.1 The customer must tell the Council if their circumstances change after a HP has been awarded. This is made clear to customers in the award letter and application form.

- 9.2 Customers must report all changes of circumstances that may be relevant to the HP award to the Revenues and Benefits Service even if they have been reported to other services or departments. The Council reserves the right to revise a HP award at any time if the customer's circumstances have changed.

10. Overpayment of a Housing Payment

- 10.1 The Council will make every effort to minimise overpayments. If however, an overpayment does occur, the Council will decide whether or not it is appropriate to recover it. If recovery action is appropriate the Council will use the most appropriate way in which to recover it. A written explanation of how the overpayment occurred and the periods and amounts to which it relates will be issued.

11. Disputes

- 11.1. HPs are not payments of Housing Benefit or Universal Credit and are therefore not subject to the statutory appeals process. If the customer disagrees with a HP decision they must put this in writing giving their reasons. This should normally be received by Cheltenham Borough Council within a month of the date of the decision although more time can be given in exceptional circumstances.
- 11.2. Although there is no formal appeals process, if a decision is challenged it will be looked at again in the light of representations made by the customer or their representative, by a different, more senior officer to the one who made the original decision.
- 11.3. The customer will be notified of the decision of the review which will clearly state the reasons for the decision. If the customer remains dissatisfied with the decision, the case will be passed to the Section 151 Officer for further consideration. Ultimately the customer can apply for a judicial review of the decision in the High Court but legal advice should be sought in the first instance.

12. Fraud

- 12.1 The Council takes fraud seriously and has adopted a zero tolerance approach. All allegations of fraud will be investigated; should a person make a false statement or provide incorrect evidence in support of their application for HP, they may commit a criminal offence. All such instances will be dealt with in accordance with the Counter Fraud and Anti-Corruption Policy and any overpaid monies will be recovered.

Cheltenham Borough Council

Cabinet – 17 March 2026

Discretionary Business Rate Relief Policy

Accountable member:

Councillor Peter Jeffries, Cabinet Member Finance and Assets

Accountable officer:

Jayne Gilpin, Head of Revenues and Benefits

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

The purpose of this report is to seek approval to implement temporary business rate reliefs which will limit the increase in business rates as a result of the 2026 revaluation and associated legislation changes. As the reliefs are considered a temporary measure the Council is expected to use discretionary relief powers under section 47 of the Local Government Finance Act 1988 (as amended) to grant these reliefs. The reliefs are fully funded by the Government provided they are awarded in accordance with the guidance provided.

Recommendations: That Cabinet:

- 1. Approves the amended Discretionary Business Rate Relief Policy in Appendix 3 to include the temporary reliefs referred to in this report from April 2026**
- 2. Authorises the Head of Revenues and Benefits in consultation with the Cabinet Member Finance and Assets to implement any changes to the temporary relief schemes detailed in appendix 3, as required by Government guidance, or to ensure the successful operation of the schemes.**
- 3. Due to the volume of cases, delegate award decisions on temporary reliefs detailed in appendix 3 to the Head of Revenues and Benefits and officers in the Business Rates team. In the case of a dispute reconsideration is to be made by the Section 151 Officer.**

1. Implications

1.1 Financial, Property and Asset implications

2. As detailed within the report and appendix 3 central government is providing funding for the temporary business rates relief schemes and expects the Council to use discretionary powers to award reliefs to businesses in line with guidance provided.

The Government will also provide funding to cover administration costs for each of the schemes referred to in this report although the amounts have not yet been confirmed.

Signed off by: Jon Whitlock, Head of Finance jon.whitlock@cheltenham.gov.uk

1.2 Legal implications

Under Section 47 of the Local Government Finance Act 1988 (as amended by S69 of the Localism Act 2011) the Council as the billing authority has the discretion to grant discretionary business rate reliefs.

The cost of relief awarded by the Local Authority can be recovered from the Government by way of grant under Section 31 of the Local Government Act 2003.

Signed off by: Alison McKane, Interim Deputy Monitoring Officer
alison.mckane@cheltenham.gov.uk

1.3 Environmental and climate change implications

There are no environmental and climate change implications associated with this report. The Climate Impact Assessment Tool has been completed to demonstrate the social benefits, this is attached as appendix 3.

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

1.4 Corporate Plan Priorities

The proposals in this report don't directly contribute to Corporate Plan Priorities. Implementing the relief schemes will ensure that eligible businesses pay reduced business rate bills

1.5 Equality, Diversity and Inclusion Implications

There are no implications arising from this report

1.6 Performance management – monitoring and review

The number of businesses benefiting from these relief schemes and the total amount awarded will be monitored by the Head of Revenues and Benefits and reported to the Government periodically.

2 Background

2.1 In the Autumn Budget on 26th November 2025 the Government announced support measures for businesses facing large increases in business rate bills as a result of the 2026 revaluation and associated legislation changes.

2.2 This includes the temporary Retail, Hospitality and Leisure Relief scheme, which provided a 40% discount in 2025/26 ending from April 2026. Instead, two permanently lower multipliers are being introduced.

2.3 The new reliefs being introduced from April 2026 are:

- The 2026 Supporting Small Business (SSB) Relief which will limit increases for businesses losing some, or all, of the Small Business Rate Relief they previously received. It will also limit increases for businesses losing the 40% retail, hospitality leisure relief and the 2023 Supporting Small Business Relief.
- A new relief scheme for Electric Vehicle Charging Points and Electric Vehicle Only Forecourts.
- A one year only additional relief scheme for pubs and live music venues.

2.4 As the schemes are temporary measures, the Government is not changing legislation. Councils are expected to use their discretionary powers under section 47 of the Local Government Finance Act 1988, as amended, to adopt a scheme using the detailed guidance provided. The Government will fully reimburse the council for the cost of the schemes and for administration by way of grant.

2.5 Temporary Relief schemes are included in the annexe to the Discretionary Rate Relief Policy and approval is being sought to amend this to reflect the schemes being introduced from 2026/27.

3 2026 Supporting Small Business Relief Scheme

3.1 The 2026 Supporting Small Business (SSB) Relief scheme will cap increases in business rates bills for eligible businesses losing some, or all, of:

- Small business Rate Relief
- 40% Retail, Hospitality Leisure Relief or
- 2023 Supporting Small Business Relief, from April 2026

3.2 The increase will be limited to £800 or the relevant Transitional Relief percentage cap,

whichever is the greater. Transitional Relief is introduced at each revaluation to cap rateable value increases at a set percentage. This scheme is set by legislation and is not a discretionary relief but It only caps the rateable value increase. It does not provide additional support to businesses that also lose relief, such as Small business Rate Relief.

3.3 Supporting Small Business Relief will be available for businesses that continue to meet the eligibility criteria in each of the financial years 2026/27, 2027/28 and 2028/29, unless the bill reaches the level it would have been without the relief.

3.4 Relief will be awarded in accordance with the policy in appendix 3 and detailed guidance provided.

3.5 Supporting Small Business Relief is subject to subsidy control which limits the amount of relief a business can receive over a three year period. Where it is clear that a business is unlikely to reach subsidy control limits, relief is being added to the bill. However, where larger businesses are identified as likely to exceed subsidy control limits, relief will be withheld and a declaration will be required.

3.6 Approximately 700 businesses have been identified as eligible and will receive this relief on their 2026/27 business rate bills.

4 Relief for Electric Vehicle Charging Points and Electric Vehicle Only Forecourts

4.1 In the Autumn Budget on 26th November 2025, it was announced that the Government would introduce a new relief for eligible Electric Vehicle Charging Points and Electric Vehicle only Forecourts (ECVP Relief).

4.2 This relief will be 100% for up to ten years for eligible businesses where the Electric Vehicle Charging Points or Electric Vehicle only Forecourts are separately assessed by the Valuation Office Agency, and do not form part of another assessment.

4.3 The relief will apply from 2026 and will be awarded in accordance with the policy in appendix 3 and guidance provided. Currently there are no separate ECVP assessments in Cheltenham.

5 Pubs and Live Music Venues Relief

5.1 On 27th January 2026 Government announced additional relief in 2026/27 for Pubs and Live Music Venues. Eligible businesses will receive a further discount of 15% after other reliefs have been applied to their bill.

5.2 The discount will apply for one year, in 2026/27 only, but the Government has confirmed that business rate bills for the eligible businesses will be frozen in real terms for the following 2 years.

5.3 For a business property to be considered a pub for the purpose of this relief scheme it must be:

- open to the general public
- allow free entry other than when occasional entertainment is provided
- allow drinking without requiring food to be consumed
- permit drinks to be purchased at a bar

5.4 Restaurants, cafes, nightclubs, hotels and other venues with a bar are not included as pubs.

5.5 A live music venue is one that is wholly or mainly used for the performance of live music for the purpose of entertaining an audience. Any other activities at the venue must be ancillary or incidental to the performance of live music (eg the sale of food or drink to audience members).

5.6 Relief will be awarded in accordance with the policy in appendix 3 and detailed guidance provided.

5.7 Approximately 80 businesses have been identified as eligible and will receive this relief on their 2026/27 business rate bills.

6 Reasons for recommendations

6.1 The relief schemes described in this report will reduce the business rates payable for eligible businesses in Cheltenham.

6.2 Approval is being sought to amend the Temporary Reliefs section of the Discretionary Rate Relief Policy in appendix 3, to include the new reliefs from 2026/27.

7 Alternative options considered

7.1 None. A scheme needs to be approved so that the relief can be awarded to local businesses.

8 Consultation and feedback

8.1 5.1 No consultation has been taken in relation to the implementation of the temporary reliefs detailed in this report.

9 Key risks

9.1 The risks are in appendix 1

Report author:

Jayne Gilpin, Head of Revenues and Benefits jayne.gilpin@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment – Screening
- iii. Discretionary Rate Relief Policy 2026
- iv. Climate Change Assessment

Background information:

1. Section 47 Local Government Finance Act 1988, as amended by clause 69 of The Localism Act 2011
2. <https://www.gov.uk/government/publications/business-rates-relief-2026-supporting-small-business-relief-local-authority-guidance>
3. <https://www.gov.uk/guidance/business-rates-pubs-and-live-music-venues-relief-local-authority-guidance>

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 recommendations in this report relating to temporary reliefs are not approved funding will not be distributed to businesses and residents in need of support which could cause reputational damage to the Council	Jayne Gilpin	3	1	3	Accept	Approve the policy changes	Jayne Gilpin	17/03/2026

Appendix 2: Equality Impact Assessment (Screening)

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: Jayne Gilpin	Service Area: Revenues and Benefits
Title: Head of Revenues and Benefits	Date of assessment: 16/02/2026
Signature: Jayne Gilpin	

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

Policy

If other, please specify:

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

Discretionary Business Rates Reliefs

Is this new or existing?

Already exists and is being reviewed

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

The existing policy is being amended to include new temporary business rate reliefs from April 2026

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

Aims:	To amend the discretionary rate relief policy to include new temporary business rate reliefs
Objectives:	To award Government funded discretionary business rate reliefs
Outcomes:	The temporary business rates relief being introduced will limit the increase in bills, due to the 2026 revaluation, for eligible businesses

Benefits:	Eligible businesses will pay reduced business rate bills

e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	No
Do you expect the impacts to be positive or negative?	No impact expected
Please provide an explanation for your answer:	
The impact will be to reduce business rate bills for businesses	

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

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

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

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Cheltenham Borough Council

Discretionary Rate Relief Policy 2026

Version control

Document name: Discretionary Rate Relief Policy 2026Version: 1.0

Responsible officer

- Jayne Gilpin, Head of Revenues and Benefits

Approved by:

Next review date: January 2029 (unless required for operation reasons/ change to relevant legislation/Government direction

Retention period: Indefinitely

Revision date	Version	Description
date		

Consultees

Internal

- None

External

- N/A

Distribution

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11. Administration	Error! Bookmark not defined.

1. Introduction and purpose of the policy

- 1.1 The Local Government Finance Act 1988 makes provision for local authorities to award business rate reliefs in certain defined circumstances. Relief falls into categories, mandatory and discretionary.
- 1.2 Whilst the Council is obliged to grant mandatory relief to eligible businesses it has powers to grant discretionary reliefs to ratepayers subject to certain criteria being met.
- 1.3 The purpose of this policy is to set out the circumstances in which the council will exercise its discretion to award business rates relief under Section 44A, Section 47 and Section 49 of the Local Government Finance Act 1988, as amended.

This policy includes the following:

Section 2 Discretionary rate Relief under Section 47 of Local Government Finance Act 1988

Section 3 Hardship Relief under section 49 of Local Government Finance Act 1988

Section 4 Relief for partly occupied properties under section 44A of Local Government Finance Act 1988

Annexe Temporary relief schemes funded by Government

2. Discretionary Rate Relief

- 2.1 Section 47 of the Local Government Finance Act 1988, as amended, gives the Council discretion to award relief where certain conditions are met and where it would be in the interest of council taxpayers.
- 2.2 The granting of relief falls broadly into the following categories:
 - 1) Discretionary relief top up for registered charities and community amateur sports clubs already receiving mandatory relief.
 - 2) Discretionary relief for organisations or institutions not established or conducted for profit whose main objects are charitable or are otherwise philanthropic or religious or concerned with education, social welfare, science, literature or the fine arts.
 - 3) Discretionary Relief for clubs, societies and other organisations not established or conducted for profit and wholly or mainly used for purposes of recreation.

- 4) Discretionary Relief granted to ratepayers under the Localism Act 2011 provisions eg Temporary relief schemes for specified businesses or in specified circumstances.

2.3 The Council has adopted this policy, detailing the criteria by which applications will be considered and the level of relief, to ensure consistency in the granting of relief.

3. Policy for granting relief

- 3.1 Where mandatory relief has been granted the council will not normally grant top up discretionary relief (type a) but will consider more favourably, applications from organisations providing advice and support of a social welfare nature to vulnerable residents. The facilities must be available to Cheltenham residents should they be in need of the advice and support being provided
- 3.2 Organisations applying for relief must be able to demonstrate that the activities it provides are for the benefit of and are being used by the local community. The extent to which Cheltenham residents benefit from the facilities will be considered.
- 3.3 Membership of the organisation must be open to all sections of the community without any discrimination. In general membership should not be exclusive or restrictive. If access is restricted it must be for justifiable reasons such as a recognised need to provide a facility to a specific sector of the community.
- 3.4 If the organisation charges a membership or entry fee they must not be set at such a level as to exclude the general community. Fees may be set at different rates for different classes of membership such as juniors, students, etc
- 3.5 Where the organisation runs a bar, eg a sports club, it should be ancillary to the facilities or services being provided. Consideration will be given to the extent to which a bar supports the overall operation and to the income generated.
- 3.6 Business rate payers making application must demonstrate the following:
- a) The facilities or services meet local needs and provide a significant benefit to local residents.
 - b) The organisation actively encourages membership and facilities are either widely available, or, provided to particular groups in the community such as young people, women, older age groups, disabled people, under-represented or disadvantaged groups etc.

- c) The facilities are made available to non-members and are being used by schools, casual public sessions, under-represented or disadvantaged groups in the community.
- d) Where education or training is being provided it should develop the skills of local residents, especially disadvantaged groups and any fees being charged must not be at a value to exclude the general community.
- e) Services or facilities are being provided which relieves the Council of the need to do provide similar facilities or supplements those which it does provide e.g. additional sporting facilities.

Amount of Relief

3.7 The amount of relief that can be awarded is set out in the table below

	Type of Organisation	Discretionary Relief to be Granted
A	Registered charities and community amateur sports clubs already entitled to 80% mandatory relief.	20% to top up mandatory in specified circumstances only (See point 2.4 above)
B	Non-profit making institutions or organisations whose main objectives are charitable, philanthropic, religious, concerned with education, social welfare, science, literature or the fine arts	Maximum 80% discretionary relief will be awarded
C	Clubs, societies and other organisations set up for the purpose of recreation and not established or conducted for profit	Maximum 50% discretionary relief will be awarded
D	Discretionary Relief granted to ratepayers generally	Maximum relief not determined See Temporary relief in schemes appendix A

3.8 Relief will not be awarded to charities and charitable organisations, including private schools, no longer entitled to mandatory relief as a result of a change in Government policy.

- 3.9 Relief will not be awarded where organisations cannot demonstrate to the Council's satisfaction that their main purpose is, as defined by section 47 of the Local Government Finance Act 1988, or that they are not established or conducted for profit.
- 3.10 Relief will not be awarded to businesses not providing relevant or sufficient information to allow the application to be fully considered.

How relief is provided

- 3.11 Business ratepayers applying for discretionary rate relief must complete the council's application form and provide any additional information requested.
- 3.12 Discretionary relief will be granted from the date liability commences or the beginning of the financial year in which the application is received, whichever is later.
- 3.13 All recipients of relief must notify the council within 21 days of any change in circumstances which may affect their entitlement. If the business ratepayer failed to notify the council of a change affecting entitlement relief may be revoked retrospectively.
- 3.14 Discretionary relief will be recalculated or cancelled to reflect any change in circumstances that affect entitlement, changes to entries in Rating List, or where any conditions cease to be met.
- 3.15 Periodic reviews will be undertaken and a new application may be required.
- 3.16 The order in which relief is granted is specified. Mandatory relief shall be granted in all cases where the criteria is met irrespective of whether discretionary relief can be granted or not.
- 3.17 Variations in any decision will be notified to ratepayers as soon as practicable and will take effect on a date determined by the Council. A decision may be revoked at any time.

Subsidy control

- 3.18 Rate Relief for charities and non-profit making bodies is not normally considered a qualifying subsidy because the recipients are not in market competition with other businesses. However, if the organisation is engaged in commercial activities, competes with commercial bodies or has a commercial partner then rate relief could constitute subsidy and will be subject to the Government set limits.

Decision Making

3.19 Decisions in respect of Discretionary Rate Relief will be made as follows:

- 1) Applications will be determined by the Head of Revenues and Benefits where the value of relief to be awarded is no more than £20,000.
- 2) The Section 151 Officer will determine applications where the value of relief to be awarded is between £20,000 and £100,000. Where relief would exceed this sum Cabinet will be required to approve any such award
- 3) There is no statutory appeal process against any decision made by the council under section 47 of the Local government Finance Act 1988, although, as with any decision made by a public authority, the decision can be reviewed by Judicial Review. However, ratepayers dissatisfied with the initial decision will have a right to request a re-consideration
- 4) The request must be made within 28 days of being notified of the initial decision. The Section 151 Officer will consider requests where the relief is up to £20,000 and the Cabinet Member for Finance and Assets in cases where the value of relief being considered is between £20,000 and £100,000.
- 5) Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked

4. Hardship Relief

- 4.1 Section 49 of the Local Government Finance Act 1988 provides a Local Authority with the discretion to reduce or remit payment of rates under the grounds of hardship.
- 4.2 The Council can use its discretion to reduce or remit the payment of rates where it is satisfied that the customer would sustain hardship if it did not do so, and, that it is reasonable to award relief, having taken into account the interests of the Council Taxpayers.
- 4.3 The Council will consider applications from businesses on their own merits and on a case by case basis.
- 4.4 Relief under this provision will only be granted in exceptional circumstances.

- 4.5 Applications must be on the Council's official application form and be signed by the ratepayer or authorised company representative.
- 4.6 The ratepayer must demonstrate that hardship exists and provide details of what are believed to be the responsible factors. Evidence must be provided to support the application and any additional information requested must also be supplied.
- 4.7 The ratepayer is expected to have taken appropriate action to mitigate or alleviate their hardship by, for example:
- taking independent professional business advice
 - reviewing their pricing structure or its approach to income generation
 - re-negotiating with creditors, including any financial institutions; service providers, landlord regarding rent
 - having a business plan in place to address the hardship
- 4.8 Applications may be shared with relevant Council departments or partners, as appropriate, to ascertain whether grants or other support may be available.
- 4.9 There must be a benefit to the local community and this will normally outweigh any financial cost of granting the relief.
- 4.10 Relief will only be awarded for a short period of time and not on an on-going basis. It will only be awarded in respect of the financial year in which the application is made and will end no later than 31 March.
- 4.11 Relief of up to 100% of the rate liability may be awarded but the Council will normally expect applicants to pay a portion of their rate liability.
- 4.12 The ratepayer must notify the Council of any change in circumstances during the period for which relief has been awarded, financial or otherwise. In all cases Hardship Relief will end in the following circumstances:
- At the end of a financial year
 - If there is a change of liable person
 - The property becomes empty or unoccupied
 - The ratepayer enters any form of Insolvency proceedings, including but not limited to winding up, liquidation, administration or bankruptcy.
 - The ratepayer seeks and enters into a restructuring plan
 - The ratepayer's financial circumstances change

- 4.13 Hardship Relief will be calculated as a percentage of the Business Rates bill. Should the Business Rates bill reduce within the period Hardship Rate Relief is granted, the relief will be reduced proportionately. If the Business Rates bill increases within the period Hardship Relief is granted, i.e. an increase in rateable value, the amount awarded will not automatically be increased. In such cases, the Council, will reconsider the application and may award additional relief.
- 4.14 The following factors will be taken into account when determining whether relief should be awarded:
- a) Whether the business is likely to survive without assistance through hardship relief.
 - b) Whether the closure of the business would deprive the local community of a service or facility which is considered essential or of major importance
 - c) What action, if any, the business has taken to improve the position or seek assistance from other external sources.
 - d) The extent to which the business provides employment in the local area, the number of people employed, and likely to become unemployed if the business closes.
 - e) The presence of an improvement plan and the likelihood that it will succeed.
 - f) The presence of including reserves and assets which could be utilises to improve the position.
 - g) The factors causing the hardship should be of a limited duration and should be beyond the control of the ratepayer. It should be reasonable to expect that conditions will improve.
 - h) The effectiveness of granting the relief. In particular whether the future of the business is likely to be unsustainable even if relief is granted.
 - i) Any other relevant factor.
- 4.15 The Council may consider not awarding relief in the following circumstances:
- a) Where it appears that the business is failing due to general market forces.
 - b) Where it appears that the business is suffering hardship due to inadequate financial management
 - c) Where it appears that the business is suffering financial hardship due to excessive speculation.
 - d) Where business rates have become due or increased as a result of a change in Government policy resulting in the business no longer being entitled to other reliefs.
 - e) Where the owners/directors are making excessive drawings from the business.
 - f) Where expenses are considered by the council to be excessive.
 - g) Where it appears that the business is likely to survive without assistance through hardship relief.

- h) Where sufficient or requested information has not been supplied.

Subsidy Control

- 4.16 Hardship relief for businesses engaged in commercial activities, which compete with other commercial bodies or have a commercial partner, would constitute a qualifying subsidy and will be subject to the Government set limits.

Decision Making

- 4.17 Applications will be determined by the Head of Revenues and Benefits where the value of relief to be awarded is no more than £20,000.
- 4.18 The Section 151 Officer will determine applications where the value of relief to be awarded is between £20,000 and £100,000. Where relief would exceed this sum Cabinet will be required to approve any such award.
- 4.19 There is no statutory appeal process against any decision made by the council under section 49 of the Local government Finance Act 1988, although, as with any decision made by a public authority, the decision can be reviewed by Judicial Review. However, ratepayers dissatisfied with the initial decision will have a right to request a re-consideration.
- 4.20 The request for a re-consideration must be made within 28 days of being notified of the initial decision. The Section 151 Officer will consider requests where the relief is up to £20,000 and the Cabinet Member for Finance and Assets in cases where the value of relief being considered is between £20,000 and £100,000.
- 4.21 If an unsuccessful applicant requests a reconsideration they will need to continue to pay their rates bill. Once the reconsideration has been carried out, the ratepayer will be informed, in writing, of the decision.
- 4.22 Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

5 Relief for properties partly occupied for a temporary period

- 5.1 Section 49 of the Local Government Finance Act 1988 provides a Local Authority with the discretion to reduce or remit payment of rates under the grounds of hardship.
- 5.2 The Council can use its discretion to reduce or remit the payment of rates where it is satisfied that the customer would sustain hardship if it did not do so, and, that it is

reasonable to award relief, having taken into account the interests of the Council Taxpayers.

- 5.3 The Council will consider applications from businesses on their own merits and on a case by case basis.

How Relief is provided

- 5.4 The part occupation must be for a temporary period only. Rate relief will not be awarded where the partial occupation is due to the normal day to day operation of the business, for example where a warehouse has dispatched a large order and no longer needs to store stock or a business occupied premises larger than needed leaving an area unused.
- 5.5 Awarding relief will only be considered in respect of unoccupied parts of a property that can be clearly defined and are reasonably segregated from the occupied part of the property.
- 5.6 A ratepayer must make an application for this relief to the Council and will be required to provide the following information:
- A plan of the property clearly showing the dimensions of the occupied and unoccupied area. The plan must be of a sufficient quality to enable the Valuation Office Agency to apportion the rateable value of the property between the occupied and unoccupied areas.
 - An explanation of why part of the property is temporarily not being used
 - The period relief is being requested for (see point below for limits)
 - An explanation of any short term practical or financial difficulties in either occupying or vacating the premises.
 - Details of the plans to use the property to full capacity, or move to other premises, with timescales
 - Access to the premises so that the Council can inspect the occupied and unoccupied parts, if deemed necessary
 - Any additional information requested
- 5.7 Applications must be made, all information provided, and if necessary a site visit made, during the period that relief is being claimed for. The council will not consider applications for retrospective periods.
- 5.8 Applications will not be considered until all of the required information has been received and if required a site visit has been made.

- 5.9 Upon receipt of an application the council may request that the Valuation Office Agency issues a certificate apportioning the rateable value for the property, splitting it between occupied and unoccupied parts. Relief will not be awarded unless a certificate is issued.
- 5.10 Partially occupied relief will end when the soonest of the following occurs:
- The financial year comes to an end
 - The end of a specified award period
 - Where part or all the unoccupied parts become occupied
 - Where the whole of the property becomes unoccupied
 - Where the liability for the property changes.
- 5.11 Any relief awarded will be determined by a recalculation of business rates for the relevant period based on the apportioned rateable value issued by the Valuation Office Agency.
- 5.12 The business ratepayer must notify the council within 21 days of any change in circumstances which may affect their entitlement to this relief.
- 5.13 Relief will be recalculated or cancelled to reflect any change in circumstances that affect entitlement, changes to entries in Rating List, or where any conditions cease to be met.
- 5.14 Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

Decision Making

- 5.15 Applications will be considered by members of the business rates team and where the requirements in this policy have been met the application will be made to the Valuation Office Agency.
- 5.16 The award of any relief will be determined by the Head of Revenues and Benefits where the value is no more than £20,000.
- 5.17 The Section 151 Officer will determine relief to be awarded where the value is between £20,000 and £100,000. Where relief would exceed this sum Cabinet will be required to approve any such award.

- 5.18 There is no statutory appeal process against any decision made by the council under section 44A of the Local government Finance Act 1988, although, as with any decision made by a public authority, the decision can be reviewed by Judicial Review. However, ratepayers dissatisfied with the initial decision will have a right to request a re-consideration.
- 5.19 The request must be made within 28 days of being notified of the initial decision. The Section 151 Officer will consider requests where the relief is up to £20,000 and the Cabinet Member for Finance and Assets in cases where the value of relief being considered is between £20,000 and £100,000.
- 5.20 If an unsuccessful applicant requests a reconsideration they will need to continue to pay their rates bill. Once the reconsideration has been carried out, the ratepayer will be informed, in writing, of the decision.

Annexe

Temporary business Rate Reliefs 2026/27-2028/9

A1 General Explanation

- A1.1 From time to time, additional measures are proposed by the Government to provide assistance to businesses. These can be either national schemes or locally defined schemes.
- A1.2 As these schemes are usually only applicable for a temporary specific period they are not embedded in legislation and councils are expected to use discretionary powers under Section 47 of the Local Government finance Act 1988 (as amended) to grant relief in accordance with any guidance provided.
- A1.3 The Government will fully reimburse Councils for the cost of the temporary reliefs in this appendix, they are awarded in line with the guidance.

A2 Supporting Small Business Relief (SSB) 2026/27 – 2028/29

- A2.1 At the Autumn Budget 2025 the Chancellor announced the 2026 Supporting Small Business Relief scheme (2026 SSBR) for the years 2026/27, 2027/28 and 2028/29.
- A2.2 2026 SSB will cap bill increases at £800 per year or the relevant caps within transitional relief (whichever is the greatest) for any business losing eligibility for the following reliefs at the 2026 revaluation:
- Small Business Rate Relief, and 40%
 - Retail, Hospitality and Leisure Relief
 - 2023 Supporting Small Business Relief
- A2.3 Businesses receiving 2023 SSB on 31/03/2026 will be eligible for 2026 SSB in 2026/27 only and the relief will cease on 31/03/2027.
- A2.4 All other eligible businesses will be able to receive the relief in financial years 2026/27, 2027/28 and 2028/29 provided they continue to meet the eligibility criteria, unless their bill reaches the level it would have been without the relief

A2.5 The relief will be awarded to business ratepayers that meet the eligibility criteria in the guidance provided by the Ministry for Housing, Communities and Local Government (MHCLG). The full guidance is available here.

<https://www.gov.uk/government/publications/business-rates-relief-2026-supporting-small-business-relief-local-authority-guidance/business-rates-relief-2026-supporting-small-business-relief-local-authority-guidance>

A2.6 Charities and Community Amateur Sports Clubs, who are already entitled to mandatory 80% relief are not eligible for 2026 SSBR.

A2.7 Eligible businesses will automatically receive the relief on their bill.

A2.8 The 2026 Supporting Small Business Relief is likely to amount to subsidy. Any relief provided under this scheme will need to comply with the UK's domestic and international subsidy control obligations.

A2.9 Where it is deemed business ratepayers are likely to exceed subsidy control limits relief will be withheld will be asked, on a self-assessment basis, to declare that by receiving the relief they will not exceed subsidy limits.

A3 Pubs and Live Music Venues Relief 2026/27

A3.1 On 27th January 2026 Government announced an additional relief in 2026/27 only for Pubs and Live Music Venues. Eligible businesses will receive a further discount of 15% after other reliefs.

A3.2 To be eligible the relevant property must be occupied and wholly or mainly used as a pub or live music venue for entertaining an audience. and meet all of the eligibility conditions

A3.3 To be considered a pub, it must be one that meets all of the following criteria:

- it is open to the general public
- it allows free entry other than when occasional entertainment is provided
- it allows drinking without requiring food to be consumed
- it permits drinks to be purchased at a bar

The meaning of pub does not include:

- restaurants, cafes, nightclubs, snack bars
- hotels, guesthouses, boarding houses
- sporting venues

- festival sites, theatres, cinemas
- museums, exhibition halls
- casinos

A3.4 To be considered a live music venue, it must be one that meets all of the following criteria:

a. Is wholly or mainly used for the performance of live music for the purpose of entertaining an audience

b. Can be used for other activities but only if those other activities:

- are ancillary or incidental to the performance of live music (e.g. the sale of food or drink to audience members)
- do not affect the primary use of the premises for the performance of live music (e.g. because the activities are infrequent such as use of the venue as a polling station or fortnightly community event)

A3.5 The relief will be awarded to business ratepayers that meet the eligibility criteria in the guidance provided by the Ministry for Housing, Communities and Local Government (MHCLG). The full guidance is available here.

<https://www.gov.uk/guidance/business-rates-pubs-and-live-music-venues-relief-local-authority-guidance>

A3.6 Eligible businesses will automatically receive the relief on their bill.

A3.7 Subsidy Control arrangements in respect of this relief will be operated in line with the guidance.

A4 Relief for Electric Vehicle Charging Points and Electric Vehicle Only Forecourts

A4.1 In the Autumn Budget on 26th November 2025, it was announced that the Government would introduce a new relief for eligible Electric Vehicle Charging Points and Electric Vehicle only Forecourts (EVP Relief).

A4.2 The relief will be 100% and will only apply where the electric vehicle charging point or electric vehicle only forecourt is separately assessed by the Valuation Office Agency and is not included with another assessment.

A4.3 Relief will be awarded to business ratepayers that meet the eligibility criteria in the guidance provided. Subsidy Control arrangements in respect of this relief will be operated in line with the guidance

A5 Administration

A5.1 Cheltenham Borough Council will administer the schemes under Section 47 of The Local Government Finance Act 1988 as amended by The Localism Act 2011 and The Non-Domestic Rating (Discretionary Relief) Regulations 1989 (S.I. 1989/1059).

A5.2 Eligibility for reliefs will be determined in accordance with the guidance provided by the Ministry of Housing, Communities and Local Government (MHCLG).

A5.3 Reliefs in this policy may be changed to reflect changes to Government guidance or to ensure successful operation of the schemes.

A5.4 All reliefs will be recalculated or cancelled to reflect any change in circumstances that affect entitlement, changes to entries in Rating List, or where any conditions cease to be met.

A5.5 Decisions relating to the granting of relief are delegated to the Head of Revenues and Benefits and staff within the Business Rates Team.

A5.6 Relief may be granted automatically where information held on the business rate account confirms eligibility in line with the qualifying criteria and that subsidy control limits will not be exceeded. In all other cases an application must be submitted with a subsidy control declaration.

A5.7 Where reliefs have been awarded businesses must notify the Council within 21 days of any change of circumstances that could affect their entitlement to the relief.

A5.8 Businesses will be required to provide any information requested to support their application for a relief.

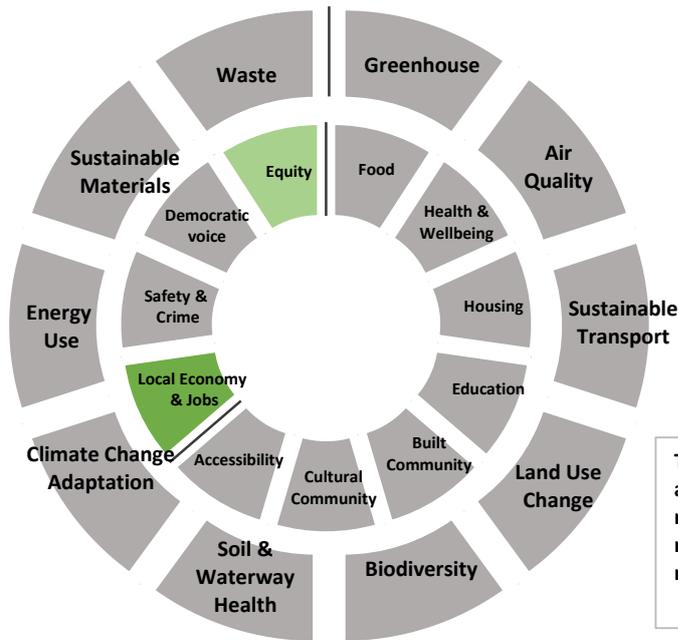
A5.9 There is no statutory right of appeal against a decision made by the Council in respect of discretionary reliefs. However, the Council will reconsider the decision if the ratepayer is dissatisfied with the outcome.

A5.10 The request for a reconsideration must be made within 28 days of the business or agent acting on behalf of the business being issued with an award decision. The review will be carried out by the Section 151 Officer.

A5.11 If an unsuccessful applicant requests a reconsideration they will need to continue to pay their rates bill. Once the reconsideration has been carried out, the ratepayer will be informed, in writing, of the decision.

A5.12 Cheltenham Borough Council will not tolerate any business falsifying their records or providing false evidence. A ratepayer who falsely applies for any relief or provides false information or makes false representation in order to gain relief will face prosecution and any relief awarded will be revoked.

Discretionary Business Rate Relief Policy 2026



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	0	There is no connection between this and the policy	0
Air quality	0	There is no connection between this and the policy	0
Sustainable Transport	0	There is no connection between this and the policy	0
Land use change	0	There is no connection between this and the policy	0
Biodiversity	0	There is no connection between this and the policy	0
Soil and waterway health	0	There is no connection between this and the policy	0
Climate Change Adaptation	0	There is no connection between this and the policy	0
Energy Use	0	There is no connection between this and the policy	0
Sustainable Materials	0	There is no connection between this and the policy	0
Waste	0	There is no connection between this and the policy	0

Social	Scores	Justification	Recommendation
Food	0	There is no connection between this and the policy	0

Health	0	There is no connection between this and the policy	0
Housing	0	There is no connection between this and the policy	0
Education	0	There is no connection between this and the policy	0
Community	0	There is no connection between this and the policy	0
Culture	0	There is no connection between this and the policy	0
Accessibility	0	There is no connection between this and the policy	0
Local Economy and Jobs	4	The reliefs will support businesses that are eligible by reducing their business rate bills	0
Safety	0	There is no connection between this and the policy	0
Equity	1	Eligibility is based on financial circumstances alone	0
Democratic Voice	0	No requirement to consult with residents on proposals	0

Cheltenham Borough Council

Cabinet – 17 March 2026

Biodiversity Report

Accountable member:

Councillor Mike Collins, Cabinet Member for Planning and Building Control

Accountable officer:

Tracey Birkinshaw, Director of Planning and Building Control

Ward(s) affected:

All

Key Decision: No**Executive summary:**

This report seeks to adopt Cheltenham Borough Council's Biodiversity Report for the period 2026–2031, fulfilling the strengthened statutory biodiversity duty under the Environment Act 2021. The report sets out

- the borough's key habitats, species,
- designated sites and green infrastructure,
- summarises the actions undertaken across planning, land management and community programmes, and
- outlines the progress made since the Council's first consideration of the duty.

It establishes a clear ecological baseline, identifies the Council's adopted actions (including Biodiversity Net Gain implementation), and sets out future priority actions aligned with the [Gloucestershire Local Nature Recovery Strategy](#), [the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan](#) and the forthcoming Nature Recovery Supplementary Planning Document.

The report is required to meet statutory reporting obligations and provides an evidence

base for the Council's ongoing work to conserve and enhance biodiversity across Cheltenham.

Recommendations: That Cabinet:

- 1. agrees that the biodiversity report (2026- 2031) be adopted.**
 - 2. delegates authority to the Director of Planning and Building Control, in consultation with the Cabinet Member for Planning and Building Control, to make any necessary minor amendments, corrections and additions to the document prior to publication.**
-

1. Implications

1.1 Financial, Property and Asset implications

There are no direct financial implications arising from adopting the Biodiversity Report. Any future actions identified within the report that require funding will be subject to separate approval processes. The report does not itself commit the Council to new expenditure, changes in asset holdings or additional property related responsibilities.

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

1.2 Legal implications

The Council must comply with the strengthened biodiversity duty contained in Section 40 of the Natural Environment and Rural Communities Act 2006, as amended by Sections 102–103 of the Environment Act 2021. This duty requires public authorities to consider, take and report on actions to conserve and enhance biodiversity. Adoption and publication of this Biodiversity Report fulfils the requirement to report at least every five years. Any future biodiversity related actions that require legal agreements, such as Biodiversity Net Gain delivery mechanisms, will follow separate legal processes.

Signed off by: Alison McKane, Interim Deputy Monitoring Officer,
Alison.McKane@cheltenham.gov.uk

1.3 Environmental and climate change implications

The Biodiversity Report complements the Council's Climate Emergency Action Plan and contributes towards achieving Net Zero by 2030. Enhancing biodiversity supports climate resilience through improved habitat quality, natural flood management, increased tree cover and sustainable land management. The report identifies biodiversity actions that help reduce carbon emissions (e.g., tree planting, reduced mowing, habitat restoration) and improve ecological connectivity. A Climate Impact

Assessment will accompany the final version of the report as required.

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

The Equality Impact Assessment (Stage 1) screening identifies no negative equalities impacts arising from the adoption of this report. Improvements in green space quality, biodiversity and nature access may have positive impacts for residents, particularly those with limited access to natural environments.

1.6 Performance management – monitoring and review

- Through normal service delivery and reporting on our [Biodiversity Duty](#).
 - Monitoring of biodiversity actions will take place through service plans, the Climate and Environmental reporting framework, and statutory biodiversity reporting requirements. The next report reviewing the Council's biodiversity duty will be published within five years (2031).
-

2 Background

2.1 The Environment Act 2021 strengthened the biodiversity duty applying to all public authorities, requiring them to consider, take and report actions to conserve and enhance biodiversity. Cheltenham Borough Council published its first consideration report to establish an initial baseline of actions. The new Biodiversity Report (2026–2031) updates this baseline.

2.2 The report highlights several positive outcomes, including;

- strengthened integration of biodiversity considerations into decision making processes,
- enhanced management of Council owned land,
- expanded tree planting and habitat improvements, and
- growing partnerships with local environmental organisations.

2.3 The Council has also successfully delivered mandatory Biodiversity Net Gain (BNG), supported by increased ecological capacity and updated planning processes. During the reporting period, seven approved biodiversity gain plans

have collectively delivered measurable ecological gains, including **1.09 habitat units and 0.56 hedgerow units**, demonstrating early effectiveness in embedding BNG requirements.

2.4 In addition to meeting the immediate statutory deadline, the Council must also prepare for ongoing requirements. Under the Environment Act, authorities must publish subsequent Biodiversity Duty Reports at least every five years. The next full report will therefore need to be produced and published no later than March 2031, although the Council may choose to report earlier to align with other strategic planning and monitoring cycles. Together, these requirements ensure that the Council maintains a transparent, evidence-based approach to biodiversity enhancement, and that progress continues to be monitored and embedded across all service areas.

3 Reasons for recommendations

3.1 Adopting the Biodiversity Report (2026–2031) is necessary to ensure Cheltenham Borough Council complies with the statutory biodiversity duty introduced by the Environment Act 2021. The Biodiversity Report establishes a robust evidence base that underpins the Council's strategic planning functions. It supports the development of the Strategic and Local Plan, informs the forthcoming Nature Recovery Supplementary Planning Document, and aligns with national frameworks including mandatory Biodiversity Net Gain and the Local Nature Recovery Strategy for Gloucestershire. By summarising Cheltenham's ecological assets, designated sites, habitat networks and species, the report enables the Council to make informed policy decisions and target future action where it will have the greatest ecological value.

3.2 The report also consolidates the work already undertaken across multiple services, including planning, green spaces, climate and sustainability, enforcement and community engagement. It evidences the Council's commitment to biodiversity through initiatives such as tree planting programmes, preparation and approval of the recent Tree Strategy, reduced mowing regimes, wildflower meadow creation, habitat restoration, ecological assessments and the implementation of Biodiversity Net Gain mechanisms. Adoption will strengthen transparency and accountability.

3.3 The Biodiversity Report provides a publicly accessible summary of how the Council is delivering nature recovery in line with local, regional and national priorities. As environmental legislation and planning requirements continue to evolve, adopting this report ensures Cheltenham Borough Council remains compliant, proactive and aligned with best practice. It provides clarity and direction to officers, councillors, stakeholders and residents regarding the Council's biodiversity commitments and the actions it intends to pursue between 2026 and 2031.

4 Alternative options considered

4.1 Not applicable as the publication of the Biodiversity Report is a legal requirement.

5 Consultation and feedback

5.1 Preparation of the Biodiversity Report involved internal consultation across Planning Policy, Development Management, Green Spaces, Climate and Sustainability, Trees, Enforcement and Legal services. Relevant officers provided input on current actions, policy alignment and future priorities.

6 Key risks

6.1 Failure to publish the Biodiversity Duty Report by the statutory deadline (12 weeks after the end of the calendar year) would place the Council in breach of its legal obligations under the Environment Act 2021. Non-compliance could lead to reputational damage, increased external scrutiny, and potential challenge from stakeholders or regulatory bodies. This risk is mitigated through timely preparation of the report and Cabinet approval ahead of the publication deadline.

Report author:

Emma Bazill, Graduate Planning Policy Officer, emma.bazill@cheltenham.gov.uk

John Spurling, Planning Policy Manager (Interim), john.spurling@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Equality Impact Assessment – Screening
- iii. Biodiversity Report 2026

Background information:

For reference: [Biodiversity duty first consideration report](#), [Environmental Act 2021](#).

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 Biodiversity Report is not produced or published, Cheltenham Borough Council will have failed to fulfil its Biodiversity Duty.	Director of Planning & Building Control	5	1	5	Accept	Informal, internal consultations with specialists in relevant fields	Director of Planning & Building Control	Cabinet decision 17 th March 2026 And publication by 26 th of March 2026

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

a. Person responsible for this Equality Impact Assessment

Officer responsible: John Spurling	Service Area: Planning
Title: Planning Policy manager (interim)	Date of assessment: 17 th February 2026
Signature: <i>John Spurling</i>	

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

Other

If other, please specify: report

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

Biodiversity report

Is this new or existing?

New or proposed

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

Legal requirement

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

Aims: The aim is to fulfil the Biodiversity Duty for local authorities as set out in the 2021 Environment Act, and to follow Key priority 3 in the Cheltenham Corporate plan.

Objectives: The objectives are to highlight key plans, partnerships and biodiversity net gain information from Cheltenham borough council; as well as delivering biodiversity related policies.

Outcomes: Delivery of biodiversity related policies

Benefits:

To improve, maintain and preserve Cheltenham’s biodiversity.

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:

No identified impacts

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

Please move on to Stage Two if required – see below – or delete if not required.



CHELTENHAM

BOROUGH COUNCIL

BIODIVERSITY

REPORT

2026

Published

XX March 2026

Executive Summary

This report fulfils Cheltenham Borough Council's statutory requirement under the Environment Act 2021 to consider, record and demonstrate the actions it is taking to conserve and enhance biodiversity. Its purpose is to establish a clear baseline of current activity, assess progress made since the first consideration stage [Biodiversity duty first consideration report](#), and set out the Council's strategic approach for the next reporting period 2026-2031.

The report provides an overview of Cheltenham's key habitats, designated sites and green infrastructure, and summarises the Council's adopted actions across planning, land management and community engagement. Notable outcomes include the integration of biodiversity considerations into decision-making processes; enhanced management of Council-owned land; expanded tree-planting and habitat improvements and strengthened partnerships with local environmental organisations.

A further outcome is the Council's delivery of mandatory Biodiversity Net Gain (BNG), supported by new ecological capacity; improved assessment processes, and alignment with emerging strategic planning frameworks, including the Strategic and Local Plan (SLP) and the forthcoming Nature Recovery Supplementary Planning Document (SPD) guidance. **During the reporting period, the Council has secured the first measurable ecological gains through mandatory BNG. Seven approved biodiversity gain plans have collectively delivered an additional 1.09 habitat units, 0 watercourse units and 0.56 hedgerow units.** These gains reflect the early effectiveness of the Council's strengthened planning processes, updated validation requirements and expanded ecological capacity. Combined with improvements to the management of Council-owned land such as reduced mowing, additional planting and enhanced habitat connectivity these outcomes demonstrate clear progress in embedding biodiversity considerations across the Council's functions.

The report concludes by outlining priority future actions focused on nature recovery, habitat connectivity, alignment with the Gloucestershire Local Nature Recovery Strategy and continued cross-service and community collaboration. Together, these measures form a coordinated approach to delivering measurable and long-term improvements for biodiversity across the borough.

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SECTION 1

Introduction

1.0 What is the Biodiversity Duty?

- 1.1 Statutory Biodiversity Duty was first introduced by section 40 of the Natural Environment and Rural Communities (NERC) Act in 2006. This required that *‘every public authority must, in exercising its functions, have regard, as far as is consistent with the proper exercise of these functions, to the purpose of conserving biodiversity’*. Sections 102 and 103 of the Environment Act 2021 strengthened this duty by amending Section 40 of the NERC Act through requiring all public authorities in England to take steps to conserve and enhance biodiversity in England.
- 1.2 This is the Biodiversity Report for Cheltenham Borough Council in its capacity as local authority covering the period 2026 – 2031. The next report will be produced within 5 years of the date of this report. This report meets the statutory duty to consider what the Council can do to conserve and enhance biodiversity in the Borough. In doing so it highlights the key plans, partnerships and Biodiversity Net Gain (BNG) information from Cheltenham Borough Council. This is the strengthened ‘biodiversity duty’ that the Environment Act 2021 introduced.
- 1.3 As a public authority Cheltenham Borough Council must (in no priority order):
- i. Consider what it can do to conserve and enhance biodiversity;
 - ii. Agree policies and specific objectives based on the consideration, and
 - iii. Act to deliver biodiversity related policies and achieve objectives.

Legislative Background

- 1.4 In January 2023, the government published the [Environmental Improvement Plan \(EIP23\)](#) setting out the nation’s commitment to halt the decline in species abundance and to protect 30% of UK land and sea for nature through the Nature Recovery Network by 2030. Moreover, by 2042, it sets the ambition to increase species abundance by at least 10%; create 500,000 hectares of wildlife habitats; reduce the

risk of species extinction and restore 75% of one million hectares of protected sites to a favourable condition.

- 1.5 In this context, to inform a baseline of its biodiversity duty, public authorities were required to publish a 'first consideration' report setting out what actions they would be taking and how it will develop its objectives and policies to meet the biodiversity duty. Agreed actions should then be reconsidered within five years of completion of the previous consideration with subsequent rolling reconsiderations at a frequency of no longer than every five years.

2.0 Biodiversity First Consideration report

- 2.1 A [Biodiversity first consideration report](#) was produced in October 2024. It highlighted the key plans, partnerships and Biodiversity Net gain information from the Council in complying with the Duty. The report was in practice a baseline position "a report zero" and this first full report builds on it and covers the period of 17th March 2026 to 30th March 2031.
- 2.2 Like the First Consideration Report this report involved the input of Officers across the Council to gauge the biodiversity related actions and future plans across the Council's range of activities and responsibilities.

3.0 Overview of Cheltenham

- 3.1 Cheltenham is a district in the Southwest region of England. Located within the county of Gloucestershire, it is enclosed geographically by the neighbouring districts of Tewkesbury to the west and Cotswold to the east. The town has a population of 118,800 and a median age of 40 years according to [2021 Census Office for National Statistics](#). Cheltenham is a spa town and is located on the edge of the Cotswolds.
- 3.2 The Council's political composition consists of a cabinet system of nine executive posts with a Liberal Democrats majority encompassing 36 of 40 seats (May 2024 Election Results, Cheltenham Borough Council).

Table 1: Table displaying political composition of Cheltenham Borough Council

Political group	Seats won	Percentage of seats
Liberal Democrats	36	90%
Green Party	3	7.5%
People Against Bureaucracy	1	2.5%
TOTAL	40	100%

3.3 For administrative purposes, the town is divided into 20 wards (see figure 1).

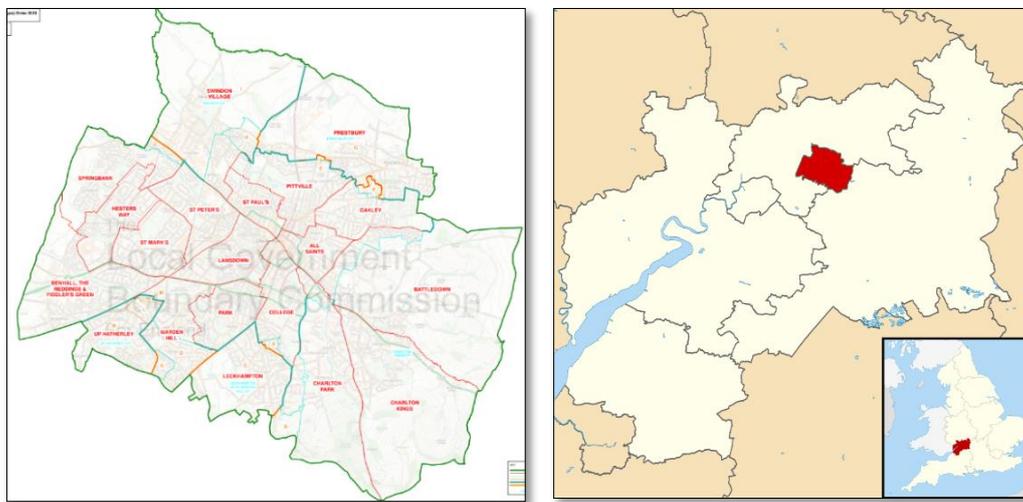


Figure 1: Wards of Cheltenham (after 2023 changes made by the Local Government Boundary Commission for England)

4.0 Cheltenham's Biodiversity

- 4.1 Cheltenham Borough Council considers it is vital that we protect, enhance and increase the biodiversity throughout our urban and rural environments. Regarding Cheltenham's biodiversity, the town contains many habitats that harbour a rich array of wildlife. Ponds, railway cuttings, hedges and verges, parks, cemeteries, school playing fields, allotments and even old buildings all host a wealth of species ranging from larger mammals like foxes and badgers to wildflowers and butterflies. Our [Corporate Plan](#), key priority 3: Reducing carbon, achieving council net zero, creating biodiversity- reflects the commitment.
- 4.2 The town is home to a variety of green spaces and nature reserves, ranging from formal gardens to Local Nature Reserves (LNRs). All these spaces are important for maintaining biodiversity. Seven formal parks in Cheltenham have achieved Green Flag awards indicating their high quality in terms of public access and biodiversity conservation, and Cheltenham is home to two LNRs; Pilly Bridge LNR and Griffiths Avenue LNR. Local Wildlife Sites are under review, and therefore subject to change.
- 4.3 Cheltenham's most important green asset for biodiversity is Charlton Kings Common and Leckhampton Hill, which is designated as a Site of Special Scientific Interest (SSSI) due to the biological interest of the unimproved calcareous grassland found on the sites, and their geological exposures (see Figure 4). Working with Natural England this area has recently been declared a [National Nature Reserve](#). The designation process for this will be undertaken later in 2026.
- 4.4 Cheltenham is partially surrounded on one side by the Cotswolds National Landscape (CNL) (formerly known as Areas of Outstanding Natural Beauty (AONB)) and Green Belt. A number of villages including Prestbury, Leckhampton and Charlton Kings lie within the borough, surrounding the tree-lined promenades and regency townscape in the centre.
- 4.5 Cheltenham has a long and distinguished history of tree cover dating back to the creation of the town and the then popular desire to plant both native and exotic trees. Some of these "original" trees are still alive today. The current tree population in both private and public ownerships remains comparatively dense. Varied and exotic trees are still found in historic public parks, gardens and open spaces.

- 4.6 Many wildlife habitats are under severe threat from development and agricultural pressures. Even a minor environmental change not requiring planning permission may radically alter the ecological balance and lead to the loss of valuable species. At the same time, wildlife areas need to be managed to ensure that certain invasive species do not destroy more sensitive flora and fauna. For example, sycamores and gorse can rapidly overrun a habitat and destroy the ecosystem's ability to support a diversity of wildlife.
- 4.7 Cheltenham is drained by several small rivers and streams which flow through the town, most notably the River Chelt. The watercourses in Cheltenham eventually contribute to the Severn River which lies to the West of Cheltenham.



Figure 2: Calcareous grassland on Charlton Kings Common and Leckhampton Hill, Cheltenham

SECTION 2

5.0 Adopted Actions

5.1 Cheltenham Borough Council has adopted various actions to preserve the Borough's natural environment, to see a detailed chronology of adopted actions see Appendix 1.

Elected Councillors Appointed to outside bodies:

5.2 These are a number of organisations which are independent of Cheltenham Borough Council but have an impact on our service areas in relation to biodiversity. In order that the council can maintain effective partnerships with a number of these organisations, the following elected councillors sit on the various committees and forums that are responsible for them.

Table 2: Cheltenham Borough Council members and their appointed outside bodies

CBC Member	Outside body	Description
Councillor Martin Horwood,	Cotswold National Landscape	The Cotswolds National Landscape (formerly referred to as the Area of Outstanding Natural Beauty) is looked after by a small team working in partnership with a number of other organisations. Through partnership working, the aims are to conserve and enhance the natural beauty of the Cotswolds, increase understanding and enjoyment of its special qualities, and foster the social and economic well-being of local communities.
Councillor Paul Baker Councillor Angie Boyes	Friends of Leckhampton Hill and Charlton Kings Common	Leckhampton Hill and Charlton Kings Common lie on the edge of the Cotswolds escarpment, the main aspect of the hill being a cherished landscape feature clearly visible from many parts of Cheltenham. The Friends of Leckhampton Hill and

		<p>Charlton Kings Common (FOLK) was formed in 2000 to represent the ecological, historical and recreational interests of all those who use and love the area.</p>
--	--	---

SECTION 3

6.0 Biodiversity Net Gain (BNG)

6.1 Under the Environment Act 2021, Biodiversity Net Gain (BNG) became mandatory for major developments from 12 February 2024 and for minor developments from 2 April 2024. This legislation requires developers to deliver a minimum 10% net gain for biodiversity. This can be achieved through one or more of the following mechanisms:

- i. On-site habitat creation and/or enhancement
- ii. Off-site habitat creation and/or enhancement
- iii. Purchase of off-site biodiversity units from an appropriate provider, such as a habitat bank or broker
- iv. Purchase of statutory biodiversity credits from the Government (to be used as a last resort).

6.2 Following the introduction of mandatory BNG in 2024, the Government undertook a public consultation titled *Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development*. The consultation ran from 2 May 2025 to 24 July 2025 and considered potential changes including the extension of exemptions, simplification of the small sites metric, improved access to the off-site biodiversity units market, and addressing challenges associated with brownfield development. A list of exemptions and associated guidance has been published by Defra. A formal Government response to this consultation is expected in 2026.

6.3 To meet its BNG obligations, Cheltenham Borough Council (CBC) has undertaken the following actions (for further detail see Appendix 2):

- i. Applied the biodiversity gain hierarchy to all non-exempt developments across the borough
- ii. Made comprehensive BNG information publicly available via the planning sections of the Council's website, including:
 - a) Links to the statutory and small sites metric tools, relevant Government guidance, and good practice documents from the Chartered Institute of Ecology and Environmental Management (CIEEM)
 - b) Links to the county-wide Gloucestershire BNG guidance

- c) Guidance for applicants on discharging biodiversity gain conditions prior to commencement, significant on-site BNG requirements, and Habitat Management and Monitoring Plans (HMMPs)
- d) Guidance on securing significant on-site and off-site BNG, including Section 106 agreements and financial contributions towards Council monitoring costs
- e) Links to guidance on habitat banks
- f) Updated local validation checklists to reflect BNG requirements for planning applications. As well as created and published a BNG statement form to support applicants in providing relevant BNG information prior to determination and delivered internal BNG training for relevant Council teams.

6.4 In addition to the above mentioned, Cheltenham Borough Council has also undertaken the following:

- i. Monitored all applications subject to mandatory BNG, including submitted biodiversity gain plans and associated legal agreements.
- ii. Procured specialist software to support the assessment, monitoring, and enforcement of BNG at both the application and post-permission stages.
- iii. Provided targeted BNG training for the biodiversity team to support implementation within development management and planning policy functions.
- iv. Appointed an additional Biodiversity Officer to support biodiversity-related functions, including BNG (Full time Senior Ecologist now in post).
- v. Supported the Gloucestershire Local Nature Partnership (GLNP) and the Gloucestershire Nature and Climate Fund (GNCF) in delivering BNG off-setting opportunities across the borough and county.
- vi. Collaborated with Gloucestershire County Council, as the responsible authority, and other supporting authorities on the Local Nature Recovery Strategy (LNRS) and its relationship to BNG.
- vii. Addressed BNG requirements through the Council's existing pre-application planning advice services.

6.5 To further meet BNG obligations in the next reporting period, Cheltenham Borough Council will:

- i. Review and update existing BNG actions and public guidance to reflect emerging best practice, new guidance, and legislative changes.

- II. Continue to secure BNG for non-exempt developments through established development management and planning policy processes.
 - III. Ensure biodiversity officers, planning officers, and validation teams receive appropriate and up-to-date BNG training to support effective assessment during the planning process.
 - IV. Assess BNG proposals in accordance with the adopted Gloucestershire LNRS to ensure opportunities are considered in a strategic context.
 - V. Continue to monitor major developments and schemes delivering significant on-site BNG and report to Defra in line with published guidance.
 - VI. Continue to work with organisations such as GNCF to support the delivery of habitat banks within the borough.
- 6.6 Between 9 October 2024 and 21 November 2025, and prior to 1 January 2026, the Council approved seven biodiversity gain plans. Six of these approvals were supported by Section 106 legal agreements for developments delivering significant on-site BNG. Collectively, the approved biodiversity gain plans have delivered an additional:
- a) 1.09 habitat units
 - b) 0 watercourse units
 - c) 0.56 hedgerow units
- 6.7 Further details of the approved biodiversity gain plans are provided in Appendix 2.

SECTION 4

7.0 Future Actions

- 7.1 Cheltenham Borough Council will meet its biodiversity duty over the next five-year period through the continued delivery and review of existing policies, objectives and actions, as set out in Appendix 3, alongside various other measures as set out in the following paragraphs.
- 7.2 Development of a Suitable Alternative Natural Greenspace (SANGs) Strategy:
 - I. Prepare a detailed action plan that will look to utilise existing green infrastructure assets that may have potential for enhanced public access.
- 7.3 Continued integration of biodiversity into decision-making.
 - I. Embed biodiversity considerations within planning policy, development management and wider decision-making processes.
 - II. Manage land and direct investment in ways that deliver measurable benefits for biodiversity.
 - III. Require ecological assessments for relevant planning applications and encourage the use of nature-based solutions where appropriate.
- 7.4 Management and enhancement of Council-owned land for nature.
 - I. Implement biodiversity-positive land management practices across Council-owned land, including parks, roadside verges and public open spaces (for example, the creation of wildflower areas, reduced mowing regimes and additional tree planting).
 - II. Support the creation, enhancement and connection of wildlife corridors and green and blue infrastructure across the borough to improve ecological connectivity and climate resilience.
- 7.5 Collaboration and partnership working
 - I. Work in partnership with local conservation organisations, nature partnerships, landowners, developers and businesses to support and deliver biodiversity initiatives.
 - II. Engage residents, community groups and volunteers to encourage local action for nature recovery and biodiversity enhancement.
- 7.6 Monitoring, reporting and review.
 - I. Publish reports at least every five years setting out how the Council is complying with its statutory biodiversity duty.

- II. Monitor and evaluate the effectiveness of actions taken to demonstrate measurable biodiversity outcomes and identify opportunities for further improvement.

Appendix 1

Table 3 details the plans that Cheltenham Borough Council has adopted, and which contribute to meeting its biodiversity duty. The table is in chronological order from oldest to newest.

Table 3: Adopted actions contributing to meeting the Biodiversity Duty

Action	Description
Biodiversity Audit 2006	<p>In March 2006 Cheltenham Borough Council commissioned Middlemarch Environmental Ltd to undertake a biodiversity audit of Cheltenham Borough with the purpose to:</p> <ol style="list-style-type: none"> i. Provide a consistent biodiversity baseline resource; ii. Provide management prescriptions; iii. Identify the potential for wildlife corridors; iv. Inform the Local Development Framework (LDF), and v. Inform the council's Green Space Strategy. <p>The desktop study identified 31 protected species within the Borough and identified the many benefits that an ecological assessment of Cheltenham Borough Open Space sites can yield. Where areas were indicated as having high biodiversity value or where a protected species was either recorded or had the potential to occur it was recommended that specific surveys were undertaken, at the appropriate time of year, to determine the precise value of the site. Such surveys would be particularly important prior to such sites being developed or a change in management being implemented.</p> <p>The management prescriptions are generic because of the scale at which the sites were assessed. Therefore, while the surveys and management prescriptions provided a good baseline it was</p>

	<p>recommended that detailed site-specific management plans are developed, particularly for the larger sites that had greater potential for habitat enhancement.</p>
<p><u>Green Space Strategy 2009-2024</u></p>	<p>A landmark document that joins-up the various elements of green space provision and management with strategic land management, sustainability, biodiversity, and resilience to climate change.</p> <p>Overall, the audit found that the borough has a significant amount of green space with almost 13% of the land mass of the area. Of the accessible green space, three quarters of the spaces are less than 0.5 hectares in size and only two sites (less than 1% of the total number) are over 20 hectares in size. The quantity overall of accessible green space equates to around 3.1 hectares per 1000 population.</p>
<p><u>Green Infrastructure Strategy 2014 (in the context of the JCS)</u></p>	<p>Green Infrastructure (GI) is the strategically planned and delivered network comprising the broadest range of high-quality green spaces and other environmental features. The Joint Core Strategy (JCS) GI strategy has its focus on connectivity and water, as brooks and streams flow through the principal settlements connecting people and wildlife.</p> <p>Recommendations for Cheltenham Borough:</p> <ol style="list-style-type: none"> i. Further improvements to Leckhampton Hill to increase its attractiveness to people and wildlife; ii. Improvement to pinch points; iii. Increased connectivity and habitat improvements along the Honeybourne railway line and links to open countryside; iv. Further develop GI asset of the old Kingham line, particularly links to open countryside;

	<ul style="list-style-type: none"> v. Better management of GI assets within public ownership, particularly habitat improvements along brook corridors; vi. Make the most of development opportunities on the periphery of the settlement to increase GI assets and facilitate connectivity with wider countryside, towards the Cotswolds and washlands of the River Severn, and. vii. Promote Sustainable Drainage Systems (SuDS) guidance that supports GI through an adopted design guide.
<p><u>Cheltenham Borough Council Open Space Study Standards Paper 2016</u></p>	<p>This document assessed the quality, quantity and accessibility standards of current open spaces and provided six recommendations to inform local plan and supplementary planning documents, such as the inclusion of standards and identification of low-quality sites for enhancement. It helps identify the deficiencies and surpluses in existing and future planned provision. Moreover, thresholds were provided for on-site and offsite new open space contributions from developments.</p>
<p><u>Carbon Neutral Cheltenham Report 2019</u></p>	<p>Within the roadmap to eliminate the Borough carbon footprint. Also gave recommendations on rewilding and large tree planting schemes.</p>
<p><u>Cheltenham Plan 2020</u></p>	<p>-Identifies the Site of Special Scientific Interest (SSSI) at Charlton Kings Common and Leckhampton Hill for which Natural England must be consulted over any planning applications for development within, or which may indirectly affect, the SSSI.</p> <p>-Identify the habitats of the barn owl, badger and bat as relevant for protected species.</p>

	<p>-Identifies two Regionally Important Geological/Geomorphological Sites (RIGS) at Little Herberts Railway Cutting and at Charlton Kings Common.</p> <p>-Identifies five Local Wildlife Sites at: Kingham Line; Ravensgate Hill (Wistley Hill); Hartley Hill Field; Ashgrove Farm, and Glenfall Wood.</p> <p>-Identifies two designated Local Nature Reserves at Griffiths Avenue and at Pilley Bridge.</p>
<p>Climate Change SPD 2020</p>	<p>This Supplementary Planning Document (SPD) provides guidance on how applicants can successfully integrate a best-practice approach towards climate and biodiversity in their development proposals.</p> <p>It states that <i>"All proposals need to protect existing and enhance future biodiversity value"</i> (p.26) by taking into consideration the proportionality and scale of the development, being assessed using the following criteria:</p> <ul style="list-style-type: none"> i. Connectivity of natural spaces. ii. Context – appropriate to the area. iii. Diversity and complexity of habitats. iv. Wellbeing – Connecting people with nature. v. Nature recovery – delivering BNG. vi. Resilience to climate change and not requiring irrigation.
<p>Climate Impact Assessment Tool 2022</p>	<p>As part of Cheltenham Borough Council’s commitment to becoming a net zero Council and Borough by 2030, environmental and social implications of all projects, policies and decisions need to be considered at the earliest stages. The council approved the</p>

	<p>introduction of a Climate Impact Assessment Tool (CIAT) that prompts officers and Members to consider such implications and shape robust projects or policies by highlighting climate positive areas and areas with scope for improvement.</p> <p>There is a section within the CIAT that relates to biodiversity. Therefore, all reports that are taken to Council or Cabinet will have considered the impacts on biodiversity including how any negative impacts can be mitigated.</p>
<p>Cheltenham Borough Council Corporate Plan 2023-2027</p>	<p>Within key priority 2 – Net Zero Cheltenham, there are two specific commitments to biodiversity:</p> <ul style="list-style-type: none"> i. Develop an Ecology and Biodiversity Supplementary Planning Document. This is the Nature Recovery SPD, which is to be considered by Cabinet during Spring 2026, and Retain Green Flag status for Cheltenham’s parks and gardens.
<p>Climate Emergency Action Plan (2025 update)</p>	<p>2020-2023 targets:</p> <p>Increasing Tree cover: Update local planning strategies and work closely with other authorities, including Gloucestershire County Council (GCC). Such updates will work to significantly increase tree cover across the borough and ensure existing trees are properly protected. The latter will also aid in storing carbon, support nature, aid flood protection and deliver health and wellbeing benefits.</p> <p>Increased canopy cover can also provide shade for people and buildings, cooling the air and ground temperatures in extreme heat. During 2023 1,000 trees were planted, and support has been secured from GCC to plant a further 600 in the future. These are a mix of native and non-native species, large and small, short- and long-lived, with</p>

both insect and wind pollinated species. 2025 Update: In 2025-26, CBC planted 78 stand-alone trees and 200 whips. Trees have been planted across all areas of the town with special emphasis on planting trees in areas sparse with canopy cover in Cheltenham. These have been planted on the highway verge as well as parks, gardens and other public open spaces. A large variety of native and exotic species were chosen from large and small to wind and insect pollinated trees.

Managing Council Owned Land to Increase Biodiversity: Manage council-owned land to increase biodiversity and reduce carbon pollution, i.e. through reduced pesticide use and mowing and increased planting of wildflowers and perennials. During 2024 and 2025, the Green Space Team has continued to deliver a wide range of volunteer activities and biodiversity enhancement projects across the town. This includes ongoing survey monitoring of existing meadows, supplemented with locally sourced seed, as well as butterfly surveys carried out in partnership with the University of Gloucestershire and the Butterfly Conservation Trust.

The main ornamental display area on the Promenade/Long Gardens has been transitioned fully perennial planting scheme, designed to improve habitat value for pollinating insects, reduce water usage, lower maintenance demand, and increase climate resilience. The refreshed scheme incorporates a wide mix of perennials, shrubs, bulbs and evergreens carefully selected to benefit urban wildlife, while providing year-round interest.

We have planted nine new community orchards in collaboration with the Gloucestershire Orchard Trust, and volunteers continue to support the removal of Himalayan balsam along local watercourses.

The Green Space Team has also developed and delivered a new educational biodiversity presentation for local interest groups and schools, alongside training for volunteers focusing on pollinating insects, moths and birds. This has included participation in public-facing events such as the 2025 illustrated talk organised with

	<p>Butterfly Conservation, highlighting the biodiversity improvements taking place across Cheltenham.</p> <p>A series of native landscape projects have been completed across the town's green spaces incorporating native planting, scrapes and swales. Management plans have been updated to ensure softer, more sympathetic maintenance practices that better support nature recovery. Additional interpretation has been installed at sites to help explain the environmental benefits of these changes.</p>
<p>Tree Inspection Protocol 2024</p>	<p>The council has a protocol, reviewed in September 2024, which is an operational document setting out the approach to managing its tree stock. It outlines the systems of management with the objective of maintaining canopy cover in an acceptably safe manner within the context of resources available. It also sets out the approach to risk management of publicly owned trees within Cheltenham.</p> <p>It does not relate to trees situated within the public highway (which are the responsibility of Gloucestershire County Council) nor trees on private or other land. It seeks to achieve a balance between the many and varied benefits of the existing trees in both an urban and rural setting and the risks posed by such trees through the implementation of what is reasonable and what is practicable in terms of management of such risk.</p> <p>The protocol is underpinned by five key principles:</p> <ol style="list-style-type: none"> 1. Trees provide a wide variety of benefits to society, 2. Trees are living organisms that naturally lose branches and fall, 3. The overall risk to human safety is extremely low, 4. Tree owners have a legal duty of care,

	<p>5. Tree owners should take a balanced and proportionate approach to tree safety management.</p> <p>It was updated in 2024 to:</p> <ol style="list-style-type: none"> 1. Reflect relevant arboriculture guidance and best practice on the management and maintenance of tree stock, and 2. Take account that Cheltenham Borough Council and Cheltenham Borough Homes, as of the 1st July 2024 became a single organisation. <p>This protocol covers all assets across Cheltenham Borough Council ownership.</p>
<p>Ash Die Back Management Plan 2024</p>	<p>Ash dieback (ADB) <i>Hymenoscyphus fraxineus</i> (formerly <i>Chalara fraxinea</i>), will likely lead to the gradual death of most ash trees within Cheltenham borough and indeed the country. The scale of death will be greater than the impact of Dutch elm disease that occurred in the 1970s. There is no way to reduce the spread of infection and the demise of these native (and exotic species) of ash trees. The council can only react to this die-back.</p> <p>The ADB management plan is an operational and supporting document to the Council Tree Inspection Protocol. It is not possible to give the precise numbers of ash trees on land controlled by public authorities across Cheltenham. There are 420 significant trees and groups of ash trees under routine inspection by Cheltenham Borough Council's Tree team. Some of these groups of trees are large (10,000+) and dense and there is a considered variable but generally low adjacent target. Whilst such a group is recorded as one tree, in reality there may actually be several hundred/thousand ash trees of varying size and maturity.</p>

Table 4 presents the combined efforts with other authorities to achieve the biodiversity duty.

Table 4: Combined efforts to achieve biodiversity duty.

<p>Joint Core Strategy (JCS) Green Infrastructure Strategy 2014</p>	<p>The strategy states that “Cheltenham will continue to follow the principles that has seen it referred to as ‘a town within a park’, retaining its Regency character, tree-lined promenades and streets, and attractive green spaces and squares, while creating contemporary, new developments.” Coherently, the development policies for biodiversity are as follows:</p> <p>Policy SD9 - Biodiversity and Geodiversity:</p> <p>Legal safeguarding for European and National protected species.</p> <p>Local sites contributing to a wider biodiversity network.</p> <p>Encouraging new developments to include wildlife corridors.</p> <p>Encouraging the creation of priority habitats and species.</p> <p>Policy INF3 - Green Infrastructure:</p> <p>Improving linked green corridors.</p> <p>Protect and contribute to ecosystem services.</p> <p>Integrate and provide for future schemes.</p> <p>It is an aspiration that the JCS green infrastructure Strategy will be updated and this updated.</p>
<p>Cheltenham, Gloucester and Tewksbury Strategic & Local Plan (SLP)</p>	<p>Cheltenham Borough Council is currently working with Gloucester City Council and Tewkesbury Borough Council on a joint plan, called the Strategic and Local Plan (SLP). The SLP will replace the 2017 JCS and will provide strategic policies for the entire area as well as more locally specific policies. The SLP will play an important role in establishing the principles of BNG in terms of providing clear policy wording, focusing on local and strategic priorities for biodiversity and</p>

	<p>identifying and allocating potential off-site areas for BNG, focusing enhancements which fit into local and strategic biodiversity priorities. The SLP is at Reg 18 stage. It had the first round of consultation on spatial options and key policy areas during early 2024 and various other phases of engagement are still underway.</p> <p>The SLP will contain objectives, policies as well as a monitoring framework, which will help to meet the biodiversity duty.</p>
<p>Cotswold Beechwoods SAC Recreation Mitigation Strategy (2022) & The Severn Estuary SAC, SPA, Ramsar Recreation Mitigation Strategy (2024 - 2029)</p>	<p>The strategy published in 2022 collectively by the district councils of Stroud, Cheltenham, Cotswold, Gloucester, and Tewksbury, provides a framework under which applications for development likely to have a significant effect on the Cotswold Beechwoods Special Area of Conservation (SAC) can be permitted so that any adverse effects on the integrity are avoided. From mid-late 2023, CBC has been collecting payments for Suitable Alternative Natural Greenspace (SANGs) and Strategic Access Management and Monitoring (SAMM) delivery. In April 2024, the Cabinet committed to bringing forward a detailed action plan for Cheltenham borough that will look to utilise existing parks, gardens, public open spaces, accessible private green spaces and designated Local Green Spaces, including raising awareness of less well known spaces as well as considering new areas in each of these categories that may have the potential for enhanced public access and wherever possible deliver benefits for those communities most impacted by development and those with least access to nature in their neighborhoods. Work is underway to bring this action plan forward through a Cabinet decision planned during May 2026. Monitoring proposals are included in the strategies (see page 50 of the Cotswold Beechwoods strategy) - these will be finalised along with the governance arrangements.</p>
<p>Gloucestershire Tree Strategy (2020)</p>	<p>A thriving network of sustainably managed trees and woodlands covering at least 20% of the county, delivering resilience and connectivity for people, wildlife and the economy.</p>

	<p>The Government 25 Year Environment Plan sets a target of 12% tree cover by 2050. This is out of step with the UK Government’s Committee for Climate Change (CCC) suggestion of an increase in woodland cover to 19% nationally by 2050.</p> <p>As Gloucestershire already has a higher proportion of tree cover than the national average, as well as strong ambitions to lead, partners have agreed to adopt an ambitious target of 20% tree cover by 2030.</p>
<p>Local Nature Recovery Strategy (LNRS)</p>	<p>England is considered one of the most nature-depleted countries in the world following historic and ongoing declines. The government has made legally binding commitments to end these declines and for nature to recover it will require targeted, coordinated, and collaborative action. The Local Nature Recovery Strategy was published on the 13th of February 2026. It will aim to provide local maps of key habitats and set key priorities for recovery. There are 48 responsible authorities across England that lead on preparing an LNRS. Gloucestershire County Council lead on the production through the Gloucestershire Local Nature Partnership, of which Cheltenham Borough Council is part of. The LNRS informs the priority habitats and species in the emerging SLP. Furthermore, it is a key evidence document for informing any biodiversity requirements and nature-related policies in the new SLP. For instance, it will give higher value in some areas when calculating Biodiversity Net Gain Units. The LNRS mapping will be used to assess all planning applications that require BNG and all land allocations in future local plans.</p>

Appendix 2

Table 5: Actions taken by Cheltenham Borough Council to meet BNG obligations

BNG Obligation	Actions by CBC
Check that all required information is submitted with planning applications for development that would be subject to the biodiversity gain condition	CBC has employed a Senior Planning Ecologist since June 2024
Check metric calculations submitted with planning applications for development that would be subject to the biodiversity gain condition	CBC has employed a Senior Planning Ecologist since June 2024
Check habitat survey information submitted with planning applications for development that would be subject to the biodiversity gain condition	CBC has employed a Senior Planning Ecologist since June 2024
Enter into legal agreements to secure biodiversity net gain being delivered	Bespoke Section 106 agreement templates for BNG delivery have been produced by the legal teams, using the Planning Advisory Service's templates developed by Dentons. Conservation Covenants will be used where necessary.
Working with developers who wish to buy statutory biodiversity credits	CBC has employed a Senior Planning Ecologist since June 2024
Review and approve biodiversity gain plans submitted	CBC has employed a Senior Planning Ecologist since June 2024
Check the biodiversity gain sites register for off-site gains	CBC has employed a Senior Planning Ecologist since June 2024
Check the right statutory credits have been purchased (where necessary)	CBC has employed a Senior Planning Ecologist since June 2024

Monitor BNG where Cheltenham Borough Council is party to the legal agreement securing BNG	CBC is exploring options to improve their enforcement resources. Therefore, BNG will be monitored in line with the details of all Biodiversity Gain Plan and Habitat Management and Monitoring Plans (HMMPs) approved by the council, by the enforcement team and the Senior Planning Ecologist
Set local policies to support BNG	Is developing a Strategic and Local Plan with Gloucester City Council and Tewkesbury Borough Council, in which BNG and nature recovery policies will be included. CBC is producing a CBC Nature Recovery Supplementary Planning Document (SPD) alongside this (Covered in Parts 1 and 2 of this report)
Facilitate transactions of biodiversity units between buyers and sellers	CBC has employed a Senior Planning Ecologist since June 2024

Table 6: Approved biodiversity gain plans

Application	Description	BNG calculation	Planning stage	Biodiversity Gain Plan approved
04/02/25 24/02144/DI SCON	Development of car park for 147 dwellinghouses (Class C3) incorporated into a part 4 storey / part 3 storey apartment block and 3 storey townhouses with associated works	0.72 Habitat Units 0.23 hedgerow Units	S106 Legal Agreement produced	Approved

11/02/2025 25/00557/DI SCON	Dean Close School Erection of a new, single storey	0.08 Habitat Units 0.18 Hedgerow Units	Complete	Approved
02/04/25 25/00558/DI SCON	Dean Close School 6 lane, lockable cricket net facility	0.04 Habitat Units	Complete	Approved
10/07/25 25/01075/DI SCON	Wallace House Erection of 3no. secure bin stores	0.025 Habitat Units 0.13 Hedgerow Units	Complete	Approved
19/03/2025 25/00403/DI SCON	Demolition of nos. 5 (3 bedroom dwelling) and 6 (4 bedroom dwelling) Beechwood Close and construction of 2no. replacement dwellings (4 bedrooms)	0.07 Habitat Units 0.02 Hedgerow Units	Complete	Approved
16/06/25 25/00798/DI SCON	Removal of existing service yard vehicle washdown pad and erection of purpose built wet and dry valeting building, together with associated infrastructure, car parking, landscaping, and other ancillary works.	0.07 Habitat Units	Complete	Approved
30/04/25 25/00693/DI SCON	51 Ryeworth Road Charlton Kings Erection of new dwelling	0.09 Habitat Units	Complete	Approved

Appendix 3

Table 7: Cheltenham Borough Council's future actions.

Action	Description
Nature Recovery SPD	<p>CBC has drafted a Nature Recovery SPD which is central to Cheltenham's present and future commitment to reversing biodiversity decline and delivering measurable environmental gains through planning.</p> <p>Its aim is to embed biodiversity and nature recovery in planning as well as to protect, enhance, and expand biodiversity across the borough. Supporting statutory duties under the Environment Act 2021 and the strengthened biodiversity duty.</p> <p>Key guidance includes:</p> <ol style="list-style-type: none"> I. Mandatory 10% Biodiversity Net Gain (BNG) for most developments, secured through Biodiversity Gain Plans and long-term management. II. Integration of nature recovery into design, promoting green infrastructure, species-specific enhancements, and Building with Nature standards. III. Alignment with the Gloucestershire Local Nature Recovery Strategy (LNRS) to prioritise habitat creation in strategic locations.

	<p>IV. Tree Strategy delivery, increasing canopy cover and species diversity for climate resilience and public wellbeing.</p>
<p>Corporate Plan 2025-2028</p>	<p>Proposed Future Action:</p> <ol style="list-style-type: none"> I. Embed biodiversity outcomes and indicators in the successor Corporate Plan (2025–2028), ensuring alignment with the Strategic & Local Plan (SLP) and the Local Nature Recovery Strategy (LNRS). II. Maintain and, where feasible, increase Green Flag parks across the borough, prioritising sites that expand habitat connectivity and deliver inclusive access to nature.
<p>Cotswold Beechwoods SAC Recreation Mitigation Strategy</p>	<p>Proposed Future Action:</p> <ul style="list-style-type: none"> • Finalise and take to Cabinet in May 2026 the Cheltenham SANGs Action Plan (in development) and commence delivery thereafter, including early wins on awareness, access management and SANG improvements. • Put in place governance and monitoring arrangements with partners (e.g., activity data, visitor surveys, habitat condition checks), and annual public reporting on spend and outcomes.
<p>Local Nature Recovery Strategy (LNRS – Gloucestershire)</p>	<p>Proposed Future Actions</p> <p>Embed LNRS priorities and mapping into:</p> <ol style="list-style-type: none"> I. SLP policies and site allocations. II. BNG strategic significance assessments.

	<ul style="list-style-type: none">III. Project pipeline for council land and partnership delivery.IV. Maintain an open GIS layer (where licensing allows) for applicants and communities, so proposals can target priority areas.
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Cheltenham Borough Council

Cabinet 17 March 2026

Notification of decisions made by the Community Infrastructure Levy Joint Committee

Accountable member:

Cllr Rowena Hay – Leader

Accountable officer:

Tracey Birkinshaw – Director Planning & Building Control

Ward(s) affected:

All

Key Decision: No

Executive summary:

The Community Infrastructure Levy (CIL) Joint Committee (CIL Joint Committee) met on 4 February 2026 to consider and make decisions on the allocation of funding for infrastructure projects and to consider opening a CIL Infrastructure Fund Projects bid round and the supporting documents required for such.

This report fulfils the requirements of the CIL Joint Committee Terms of Reference (ToRs) in respect of scrutiny provisions.

The decisions made by CIL Joint Committee on 4 February 2026 are set out in full at Appendix 3 with more detail contained in section 2 of this report.

Recommendations: That Cabinet

- 1. notes the decisions of the Community Infrastructure Levy (CIL) Joint Committee made on 4 February 2026 (see Appendix 3)**
-

1. Implications

1.1 Financial, Property and Asset implications

The CIL Joint Committee allocation decisions relate to the CIL Infrastructure Fund receipts of all the member councils; however, Cheltenham Borough Council's financial commitments only relate to the CIL payments received by it that are held by Cheltenham Borough Council relating to the CIL Reg 59(1) Infrastructure Fund portion of CIL receipts it receives.

The CIL Infrastructure Fund contains the CIL receipts that remain following the deduction of the split of a paid receipt into up to 15% capped for Parish Councils or up to 15% capped for the for unparished areas, and up to 5% towards administration cost of collecting the levy, neither of these two elements being affected by CIL Infrastructure Fund allocation decisions.

Gloucestershire County Council has already indicated that it will require the additional £4,054,141 (and thus the £1,445,955 that is Cheltenham Borough Council's proportion) to be transferred to it as soon as practicable after the associated funding agreement is signed. That transfer likely to be early in 2026/27 financial year. Cheltenham Borough Council will need to ensure that it has the funds available to meet the payment date committed too in the completed funding agreement.

The CIL Joint Committee can only make decisions on the allocation of CIL receipts that have been paid to its member councils, therefore future CIL Joint Committee meetings will need to consider future funding allocations.

The decision of the CIL Joint Committee on 4 February 2026 will now leave Cheltenham Borough Council with £0.00 in the 75% strategic infrastructure fund share of CIL receipts paid to 12 December 2025 and £1,924,482 unallocated in the 25% local strategic infrastructure fund projects share paid up to the same date. (see Table 5 in Appendix 1 of the Item 5 report 4 February 2026 CIL Joint Committee), plus any other CIL receipts paid since the date of the data in the CIL Joint Committee report, that will subsequently be allocated to the CIL Reg 59(1) Infrastructure Fund and potentially split 75% / 25% for consideration at a future date for allocation to projects.

CIL is allocated for specific purposes, and it is not at the discretion of this Council to decide to use it for an alternative purpose. Although the inflow will have a positive impact on the Council's cash flow position, there should be no impact on the revenue or capital budget unless a situation occurs where the funds are not available to be paid at the required time, and thus the Council may need to borrow to cover any agreed payment dates set out in signed funding agreements.

There are no implications for the property portfolio associated with funding decisions

made at this CIL Joint Committee meeting.

Signed off by: Andrew Sherbourne, Treasury Accountant
andrew.sherbourne@cheltenham.gov.uk

1.2 Legal implications

The “strategic” element of CIL receipts (being otherwise than up to 5% for administration and the up to 15% (capped) or up to 25% neighbourhood portion) must be spent on ‘infrastructure’ (Regulation 59). Charging authorities can choose to pool a proportion of their Community Infrastructure Levy receipts to fund infrastructure including for out of their own area spending. Each of the charging authorities included in the pooling arrangements should be content that funding for infrastructure outside the authority’s area will support development of its own area.

The Joint Committee’s Terms of Reference sets out how the pooled levy will be administered and spent.

As set out in the agreed Terms of Reference for the Joint Committee (See background papers item 2) any decisions require a full consensus vote of the Committee. Further, the decisions made by the Joint Committee shall be subject to the decisions being reported back through relevant Cabinet/Executive Committee of each of the member Councils. Any decision by the Joint Committee, except those agreed as urgent, shall not be implemented until the member Councils have formally reported back through their own Cabinet/Executive Committee. All decisions of the Joint Committee (unless considered urgent) shall be subject to the “call in” process of each member Council. If not called in during that period any decision shall then be available for implementation.

Further Legal Implications in respect of the decisions made by the Joint Committee are set out in the 4 February 2026 CIL Joint Committee report.

Signed off by: OneLegal (legalservices@onelegal.org.uk)

1.3 Environmental and climate change implications

The environmental and climate impacts and associated detailed mitigations for this scheme are explained in the Development Consent Order. This includes a variety of sustainable transport network improvements and flood mitigation measures. For the enabling works stage of the project, these funds will contribute towards archaeological and ecological investigations that are required prior to the full construction phase commencing.

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 1: Securing our future

Key priority 3: Reducing carbon, achieving council net zero, creating biodiversity

Key priority 4: Reducing inequalities, supporting better outcomes

Key priority 5: Taking care of your money

1.5 Equality, Diversity and Inclusion Implications

See Appendix 2. Some of the projects are likely to be subject to their own separate Equalities Impact Assessment in due course (where these have not already been completed) and as appropriate this will be considered by the CIL Joint Committee. Any CIL Funding bid round will be open for submission of relevant projects that would meet the required criteria by any relevant company or organisation.

1.6 Performance management – monitoring and review

Schemes that have been allocated funding will be awarded funding via a grant agreement. These agreements will be monitored via the CIL Officer Working Group and the Strategic Infrastructure Planning Manager and reported to the CIL Joint Committee.

2 Background

2.1 On 11 December 2023, Council approved the establishment of a Community Infrastructure Levy (CIL) Joint Committee under s101(5) and s102 Local Government Act 1972 and under Part 1A Chapter 2 Section 9EB of the Local Government Act 2000 and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012. The decision to establish the CIL Joint Committee was also approved by the two other partner authorities of Gloucester City Council (25 January 2024) and Tewkesbury Borough Council (23 January 2024).

2.2 At the same meeting approval was also given for;

- The CIL Joint Committee 'Terms of Reference' (since reviewed in accordance with those original Terms of Reference and other than minor amendments of clarification remaining approved at Cabinet on 18 November 2025 (and Gloucester City Council (12 November 2025) and Tewkesbury Borough Council (9 December 2025)).
- The pooling of strategic infrastructure CIL monies by the three partner Councils of Cheltenham Borough, Gloucester City and Tewkesbury Borough; and
- Engagement with wider infrastructure providers, outside the local

authorities, should be entered into.

- 2.3 The CIL Joint Committee is the decision maker subject to the decisions being reported back through relevant Cabinet/Executive Committee of each of the member Councils. All decisions of the Committee (unless considered urgent) shall be subject to the “call in” process of each member Council. If not called in during that period any decision shall then be available for implementation. This is the basis of this report to Cabinet.
- 2.4 The strategic CIL receipts, which the Councils have named the Infrastructure Fund is the CIL receipts that remain, once administration costs and neighbourhood funding amounts have been deducted, that each Council, as an individual CIL Charging and Collection Authority, has collected and pooled together.
- 2.5 At the CIL Joint Committee Meeting [4 March 2025](#) a decision was made to split the CIL Infrastructure Fund so that:
- 25% to be ringfenced for allocation to ‘local strategic infrastructure’ projects - further explanation in respect of what constitutes a local strategic infrastructure project was provided in a report to the [CIL Joint Committee 14 July 2026](#) (at which a total of £804,251 was allocated to local strategic infrastructure fund projects); and
 - allocate the then remaining 75% towards a number of projects including up to £10million towards the M5 Junction 10 scheme against a bid of £40m).
- 2.6 At the CIL Joint Committee Meeting 25 September 2025 a decision was made to allocate a further £4,448,369 as the 75% portion then available and for all future CIL income from that 75% portion to be ringfenced for allocation to delivery of the M5 Junction 10 scheme (up to a maximum of £20m (in addition to the £10m referred to above). At this meeting it was also agreed regular monitoring would be reported to the CIL Joint Committee and should the 75% portion not reach anticipated levels further consideration would be given as regards the portion of the Infrastructure Fund currently ringfenced for allocation to local strategic infrastructure projects.
- 2.7 This paper and the governance provided by the CIL Joint Committee relate to the ‘Infrastructure Fund’ portion of CIL receipts only. Under CIL allocation reports the total unallocated CIL receipts split is reported. This paper reflects the position against the CIL the Infrastructure Fund receipts paid to 12 December 2025 and potential CIL receipts unallocated under the split over all time in the Infrastructure Fund. This split of the Infrastructure Fund is reconsidered every time the CIL Joint Committee has met since and considered

CIL project allocations recommendations.

2.8 The CIL Joint Committee on 4 February 2026 considered two reports that required a decision.

Re-evaluation of CIL Bid for M5 Junction 10 and Reconsideration of the CIL Allocation and Proposed CIL Infrastructure Allocations: This report set out:

- the availability of CIL Regulation 59(1) CIL receipts paid over all time unallocated and specifically received between 26 August 2025 and 12 December 2025.
- consideration of the additional amount available to allocate from the 75% share of the Infrastructure Fund.
- recommendation to continue to commit to allocating up to £20 million of CIL receipts from the pooled CIL Regulation 59(1) Infrastructure fund to support the M5 Junction 10 scheme, and the likelihood of this share generating sufficient income to support this within the required project programme timescale to support the continuance of ringfencing of 25% of the CIL Infrastructure Fund for allocation to what has termed local strategic infrastructure projects.

2.9 The above was informed by CIL Joint Committee 4 February 2026 Item 5 Appendix 1 Table 4 (as repeated below):

Total Pooled CIL Reg 59(1) Infrastructure Fund Received to 26 August 2025 reflecting allocation status under the agreed 75% Strategic Infrastructure Project to 25% Local Strategic Infrastructure Project Split

	Total Pooled CIL Infrastructure Fund Received to 12.12.2025	Total pooled CIL Infrastructure Fund allocated to 26.08.2025	Total Pooled CIL Infrastructure Fund unallocated to 12.12.2025
75% Strategic infrastructure Fund (£)	£22,265,790	£18,211,649	£4,054,141
25% Local Strategic Infrastructure Fund (£)	£7,421,930	£804,250	**£6,617,679
	£29,687,720	£19,015,900	£10,671,820

**The 25% of the CIL Reg 59(1) Infrastructure Fund unallocated to 12 December 2025 date is a larger financial value because a significant amount of this share of the fund from receipts up to 12 December 2025 having not previously been allocated to projects by the CIL Joint Committee.

2.10 The allocation decisions made results in the following split of funding from the relevant member Councils for the M5 Junction 10 project in respect of the allocated £4,054,141, as well as the split of funding remaining (as at 12 December 2025) within the 25% local strategic infrastructure fund as set out in the table below:

Table 1: Pooled CIL Reg 59(1) Infrastructure Fund Receipts Paid Unallocated on 12 December 2025 Split by CIL Authority and agreed 75% Strategic Infrastructure Fund Projects and 25% Local Strategic Infrastructure Fund Project (TOTAL £unallocated on 12 December 2025 = £10,671,820.25)

CIL Charging Authority	75% CIL Strategic Infrastructure Fund (£)	25% CIL Local Strategic Infrastructure Fund (£)
Cheltenham Borough Council	£1,445,955	£1,924,482
Gloucester City Council	£0	£99,504
Tewkesbury Borough Council	£2,608,185	£4,593,692
Totals (£)	£4,054,141	£6,617,679

2.11 There was no allocation to the M5 Junction 10 project from Gloucester City Council as it had no CIL receipts paid within the payment timeframe under consideration.

CIL Infrastructure Fund Bid Round and CIL Infrastructure Funding Project Bid Form and CIL Infrastructure Funding Bid Project Assessment Form Review: This report set proposed timing of a new CIL bid round and updates presented to the documents that would be necessary to support this.

2.12 Cllr Collins, Cabinet Member for Planning and Building Control was the voting Member for Cheltenham Borough Council for this CIL Joint Committee meeting.

2.13 The decisions of CIL Joint Committee are set out in Appendix 3 of this report.

3 Reasons for recommendations

3.1 The purpose of this report is not to debate the decisions of the CIL Joint Committee, but to note the decisions made by it, to facilitate the scrutiny provisions.

3.2 The CIL Joint Committee is a fully constituted Committee. The Joint CIL Committee Terms of Reference require the reporting of its decisions to the Executive / Cabinet as relevant for each of the member councils prior to the implementation of decisions it has made. The decisions of the CIL Joint Committee are subject to each member council's scrutiny provisions.

4 Alternative options considered

- 4.1 None. The Terms of Reference require each partners council of the CIL Joint Committee to report back through their relevant constitutional arrangements.

5 Consultation and feedback

- 5.1 Not relevant for the purposes of this report.

6 Key risks

- 6.1 See Appendix 1.

Report author:

Sarah Screen, Strategic Infrastructure Planning Manager, for the councils of Cheltenham Borough, Gloucester City and Tewkesbury Borough.

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Appendices:

1. Risk Assessment
2. Equality Impact Assessment – Screening
3. CIL Joint Committee 4 February 2026 Decisions

Background information:

1. [Cheltenham Borough Council Corporate Plan Update – Council 21st July 2025](#)
2. Community Infrastructure Levy Joint Committee [Terms of Reference](#)
3. [Community Infrastructure Joint Committee, 14 July 2025 – Agenda Papers](#)
4. CIL Joint Committee [25 September 2025](#) Agenda Reports pack
5. Gloucestershire County Council [Cabinet 17 September 2025](#) Item 8 page 161 (specific p 173)
6. CIL Joint Committee [04 February 2026](#) Agenda Reports Pack
7. M5 Junction 10 Scheme [Development Consent Order](#)

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	If the partner councils do not report the decisions of the CIL Joint Committee through their relevant Cabinet/Committee processes, then the funding allocated cannot be drawn down in funding agreements	CIL Joint Committee	4	1	4	Accept	Each partner council reports the decisions as required through its own constitutional arrangements	Director Planning & Building Control	Cabinet meeting 17 March 2026 <i>(11 March 2026 Cabinet for Gloucester City Council and 18 March 2026 Executive Tewkesbury Borough Council)</i>

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: Sarah Screen	Service Area: Planning
Title: Strategic Infrastructure Planning Manager (on behalf of Director Communities and Economic Development)	Date of assessment: 18 February 2026
Signature: <i>Sarah Screen</i>	

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

Function

If other, please specify:

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

Community Infrastructure Levy Regulations 2010 (as amended)

Is this new or existing?

Other

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

No change. The report facilitates compliance with the CIL Joint Committee Terms of Reference

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

Aims:	To comply with the CIL Joint Committee Terms of Reference
Objectives:	To allocate CIL Strategic Infrastructure funding through a full and transparent assessment and ensure consistency and transparency for CIL Infrastructure Fund Project bid submissions and the review of bids received.
Outcomes:	Decision making within the context of the CIL Joint Committee Terms of Reference.

Benefits:	The communities, businesses and visitors across Cheltenham, Gloucester, and Tewkesbury.
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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
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Do you expect the impacts to be positive or negative?	Positive
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Please provide an explanation for your answer:

CIL monies are collected under the CIL Regulations to help support development through funding relevant infrastructure. The decision of the CIL Joint Committee to date to ringfence 25% of the CIL Infrastructure Fund to potentially support what it has termed 'local strategic infrastructure projects' and currently holds unallocated CIL Infrastructure Fund receipts against this share means that a CIL funding bid round needs to be opened to allow the submission of funding bid applications across the whole Infrastructure Fund. To provide equity and fairness CIL it is proposed to use an improved project bid application form and an improved bid assessment form. All CIL awards will be monitored via the CIL Joint Committee.

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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Appendix 3

CIL Joint Committee 4 February 2026 Decisions

Item 5 Decisions: Re-evaluation of CIL Bid for M5 Junction 10 and reconsideration of the CIL allocation approach and proposed CIL Infrastructure fund allocations

1. the unallocated but already collected £4,054,141 held within the current 75% portion of the Infrastructure Fund be allocated and funding agreement entered into with Gloucestershire County Council to support the delivery of the M5 Junction 10 scheme;
2. future CIL income within the 75% portion of the Infrastructure Fund continue to be ringfenced for allocation to Gloucestershire County Council to support delivery of the M5 Junction 10 scheme up to a maximum of £20m (including the £4,448,369.66 allocation on 25 September 2025 and the £4,054,141 set out above) with specific allocations of any such sums being brought back to future meetings of the CIL Joint Committee for consideration; and
3. regular monitoring continue to be reported to the CIL Joint Committee and, should the 75% portion of the Infrastructure Fund not reach the anticipated levels within the report within the project delivery timescale, further consideration be given as regards the portion of Infrastructure Fund currently ringfenced for allocation to local strategic infrastructure projects.

Item 6 Decisions: CIL Infrastructure Fund Bid Round and CIL Infrastructure Funding Project Bid Form and CIL Infrastructure Funding Bid Project Assessment Form Review

1. That the updated renamed CIL Infrastructure Funding Project Bid Form be **APPROVED** for use for the submission of CIL Infrastructure Fund projects for consideration by the CIL Joint Committee (Appendix 1) supported by the appendices stated therein including the addition of an Appendix B CIL Project Costs and Funding Tracker (Appendix 2) with authority **DELEGATED** to the Director: Growth to approve minor amendments to structure and content prior to use.
2. That the updated renamed CIL Infrastructure Funding Project Bid Assessment Form (Appendix 3) be **APPROVED** for use to assess future CIL Project funding bids subject to a review of the points raised by CIL Joint Committee (in respect of questions 3, 4, 5, 6, 9 and 10) by the Director: Growth in consultation with the Chair and Vice-Chair of the CIL Joint Committee with authority

DELEGATED to the Director: Growth to approve amendments arising from that review and minor amendments to structure and content prior to use.

3. That a CIL Infrastructure Fund Project Bid round be opened in Spring 2026 for a minimum of eight weeks, with the exact timing of this to be delegated to the Director: Growth in consultation with the Director of Planning and Building Control (Cheltenham Borough Council) and the Head of Place (Gloucester City Council).