



CHEL TENHAM

BOROUGH COUNCIL

BIODIVERSITY REPORT 2026

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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).

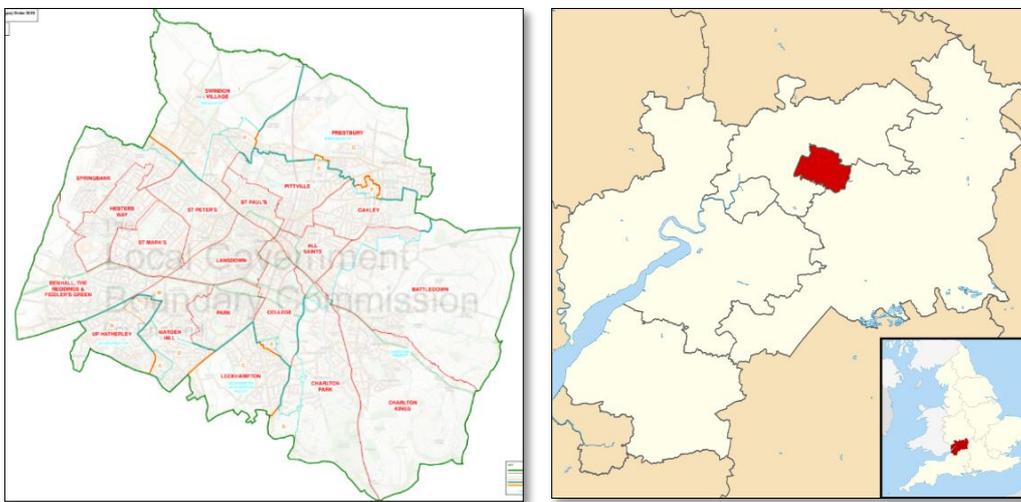


Figure 1: Wards of Cheltenham (after 2023 changes made by the Local Government Boundary Commission for England)

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>
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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> <ul 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.
Cheltenham Borough Council Open Space Study Standards Paper 2016	<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>
Carbon Neutral Cheltenham Report 2019	<p>Within the roadmap to eliminate the Borough carbon footprint. Also gave recommendations on rewilding and large tree planting schemes.</p>
Cheltenham Plan 2020	<ul style="list-style-type: none"> -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. -Identify the habitats of the barn owl, badger and bat as relevant for protected species.

	<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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