

# Public Document Pack



## **BROMSGROVE DISTRICT COUNCIL**

### **MEETING OF THE OVERVIEW AND SCRUTINY BOARD**

**TUESDAY 10TH FEBRUARY 2026**

**AT 6.00 P.M.**

**PARKSIDE SUITE - PARKSIDE**

**MEMBERS:** Councillors P. M. McDonald (Chairman), A. M. Dale (Vice-Chairman), S. Ammar, A. Bailes, R. Bailes, J. Clarke, B. Kumar, R. E. Lambert, S. A. Robinson, J. D. Stanley and H. D. N. Warren-Clarke

### **AGENDA**

1. **Apologies for Absence and Named Substitutes**
2. **Declarations of Interest and Whipping Arrangements**

To invite Councillors to declare any Disclosable Pecuniary Interests or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.

3. **To confirm the accuracy of the minutes of the meeting of the Overview and Scrutiny Board held on 6th January 2026 (Pages 7 - 16)**
4. **Police and Crime Commissioner (Update)**

Presentation to follow

5. **Planning Advisory Service (PAS)** (Pages 17 - 54)

Further details will be provided in a supplementary papers pack.

6. **Local Government Re-organisation (Update)** (Pages 55 - 60)

7. **Worcestershire Health Overview and Scrutiny Committee (Update)**

There will be no update as the recent HOSC meeting was cancelled.

8. **Finance and Budget Working Group (Update)**

9. **Cabinet Work Programme** (To follow)

This will follow in a supplementary papers pack.

10. **Overview and Scrutiny Board Work Programme** (Pages 61 - 62)

11. **Overview and Scrutiny Action Sheet** (Pages 63 - 64)

12. **To consider any urgent business, details of which have been notified to the Assistant Director Legal Democratic and Procurement Services prior to the commencement of the meeting and which the Chairman, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting.**

13. **To consider, and if considered appropriate, to pass the following resolution to exclude the public from the meeting during the consideration of item(s) of business containing exempt information:-**

**RESOLVED:** that under Section 100 I of the Local Government Act 1972, as amended, the public be excluded from the meeting during the consideration of the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of scheme 12A to the Act, as amended, the relevant paragraph of that part, in each case, being as set out below and that it is in the public interest to do so:-

Item No	Paragraph
14	3
15	3

14. **Town Centre Parking and ANPR (Update)** (Pages 65 - 88)

15. **EV Charger Profit Sharing arrangements (Update)** (Pages 89 - 92)

J. Leach  
Chief Executive

Parkside  
Market Street  
BROMSGROVE  
Worcestershire  
B61 8DA

2nd February 2026

**If you have any queries on this Agenda please contact  
Sarah Woodfield**

**Parkside, Market Street, Bromsgrove, B61 8DA  
Tel: (01527) 64252 Ext: 1605  
Email: s.woodfield@bromsgroveandredditch.gov.uk**

## **GUIDANCE ON FACE-TO-FACE MEETINGS**

**If you have any questions regarding the agenda or attached papers,  
please do not hesitate to contact the officer named above.**

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#### **Notes:**

**Although this is a public meeting, there are circumstances when Council might have to move into closed session to consider exempt or confidential information. For agenda items that are exempt, the public are excluded and for any such items the live stream will be suspended and that part of the meeting will not be recorded.**



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## **BROMSGROVE DISTRICT COUNCIL**

### **MEETING OF THE OVERVIEW AND SCRUTINY BOARD**

**6TH JANUARY 2026, AT 6.00 P.M.**

PRESENT: Councillors P. M. McDonald (Chairman), S. Ammar, A. Bailes, R. Bailes, A. M. Dale, D. J. A. Forsythe (Substitute), D. J. Nicholl (Substitute), S. A. Robinson, J. D. Stanley and H. D. N. Warren-Clarke

Observers: Councillor K. May – Leader and Cabinet Member for Strategic Partnerships, Economic Development and Enabling  
Councillor S.J. Baxter – Deputy Leader and Cabinet Member for Reorganisation and Climate Change  
Councillor S.T. Nock – Cabinet Member for Finance  
Councillor K. Taylor – Cabinet Member for Planning, WRS and Strategic Housing  
Councillor S.R. Colella

Officers: Mr G. Revans, Ms R. Egan, Ms J. Willis, Mr M. Cox, Mr M. Eccles, Ms A. Delahunty, Ms R. McElliott, Mr C. Poole, Ms M. Worsfold and Mrs S. Woodfield

72/23

#### **APOLOGIES FOR ABSENCE AND NAMED SUBSTITUTES**

Apology for absence was received on behalf of Councillor B. Kumar, with confirmation provided that Councillor D.J.A. Forsythe was attending as his named substitute.

Apology for absence was also received on behalf of Councillor J. Clarke, with confirmation provided that Councillor D.J. Nicholl was attending as the named substitute.

Apologies were also received from Councillor R.E. Lambert.

73/23

#### **DECLARATIONS OF INTEREST AND WHIPPING ARRANGEMENTS**

There were no declarations of interest nor of whipping arrangements.

74/23

#### **APPOINTMENT OF VICE CHAIRMAN**

Councillor A.M. Dale nominated herself for the position of Vice-Chairman which was seconded by Councillor S. Ammar. On being put to the vote it was

**RESOLVED** that Councillor A.M. Dale be appointed as Vice-Chairman of the Board for the ensuing municipal year.

75/23

**TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE OVERVIEW AND SCRUTINY BOARD HELD ON 18TH NOVEMBER 2025**

The minutes of the Overview and Scrutiny Board meeting held on 18<sup>th</sup> November 2025 were considered by the Board.

A Member requested that an update for Churchfields Car Park should be added to the work programme for the Board's consideration. However, Officers advised that the February report for Town Centre Parking would include the Churchfields Car Park, which was deemed as acceptable by the Board.

**RESOLVED** that the minutes of the Overview and Scrutiny Board meeting held on 18<sup>th</sup> November 2025 be approved as a correct record.

76/23

**BIODIVERSITY DUTY REPORT - PRE-SCRUTINY**

The Climate Change Manager outlined the statutory requirements under the Environment Act 2021 for all public authorities to conserve and enhance biodiversity. Members noted that the Council was legally required to publish a Biodiversity Duty Report by March 2026.

The following key actions which had been completed included:

- Green Flag Awards for Sanders Park and Lickey End Recreation Ground.
- Grass verge biodiversity initiative.
- Tree planting programme (target of 100,000 trees over 15 years).
- Pesticide reduction and alternative weed control.
- Integration of biodiversity monitoring into the Climate Change Strategy.
- Compliance with Biodiversity Net Gain (BNG) monitoring for planning applications.

Member comments and discussions were as follows:

- Concerns were raised that targets were vague and lacked measurable outcomes. In response Officers agreed that these would be included for future reporting.
- Meaningful tree planting targets should be included in reporting which was agreed would be reviewed.
- Concerns were raised regarding biodiversity net gain, given the scale of housing development for future local plan requirements by Central Government. Members were advised that finding the relevant expertise to carry out the monitoring was a challenge. The Portfolio Holder agreed that an action plan was in progress to



review the Council's expectations on how the requirements would be implemented.

- The responsibility for monitoring biodiversity on Council owned land should include a timeline and SMART objectives.
- An explanation was provided to the Board on "Citizen Science" initiatives using the iNaturalist app.
- Consideration of risk management and resource implications was also requested for future reporting. In response Officers explained that as this was a new strategy, steps would be put in place for future reporting with considerations also to include the Local Government Reform (LGR) implications. The Executive Director reassured Members that work was being carried out to consider resource pressures for the Council.

**RECOMMENDED** that

The Cabinet is asked to RESOLVE that:-

- 1) The findings of the Biodiversity Duty First Consideration Report be noted; and
- 2) Members agree to publish the full Biodiversity Duty First Consideration Report to the Council's website.

77/23

**HOMELESSNESS PREVENTION, ROUGH SLEEPER AND DOMESTIC ABUSE GRANTS FUNDING 2027/28 AND 2028/29 - PRE-SCRUTINY**

The Strategic Housing Officer reported on the three-year Government grant for homelessness prevention, rough sleeper outreach and domestic abuse services. The funding was more generous than anticipated, allowing for stability and potential expansion of services.

A summary of proposals was highlighted as follows:

- Confirmation of three-year funding for existing providers.
- Removal of temporary accommodation funding from this grant (covered by separate revenue funding).
- Government targets were to reduce rough sleeping by fifty percent and reduce families in bed and breakfast accommodation.

Member comments and discussions were as follows:

- Whether amalgamated funding made services flexible? In response Officers expressed the view that the amalgamated funding was less flexible for temporary accommodation, however, this had been offset by increased funding.
- Why there had been underspending on crucial services? It was explained that this was due to the unexpected uplift in funding from Government, therefore, reporting for existing services only form part of this report and that a further report in respect of the

surplus funding for 2027/28 would be brought to Members in November 2026 and for 2028/29 surplus would be brought to Members in November 2027.

- Clarity for the process of monitoring and auditing grant funded services was sought by the Board. The Strategic Housing Officer explained that quarterly performance monitoring reports were a requirement, with confirmation of expenditure signed off in line with internal audit requirements.
- Clarity on the role of the part time Empty Homes Officer was explained to the Board as an initiative to work with owners of properties which had been empty for over a year. This was aimed to put properties back into use to assist with the lack of housing stock within the District and would be carried out by an existing part time officer, increasing their hours.
- Discussions were also raised regarding the increase in demand from out of area cases and pressures on temporary accommodation. Members were informed that the full rehousing duty only related to those with a priority need which included victims/survivors of domestic abuse and those with mental health issues. It was explained that demand for accommodation was a growing concern within the District but the Council's supply of accommodation becoming available had decreased.
- Further clarity on the BDHT Sunrise Project intensive support was also discussed with Members as requested. It was explained that this was a non-tenure specific, integrated support service for vulnerable residents.

## **RECOMMENDED** that

The Cabinet is asked to RESOLVE that:-

- 1) The initiatives in 4.5 be approved to receive the Homelessness Prevention and Rough Sleeping Grant and Domestic Abuse Grant allocations of funding for 2027/28 and 2028/29, subject to satisfactory performance; with any uplift and additional initiatives being implemented prior to that period to be the subject of a further report to the Cabinet; and
- 2) Delegated authority be granted to the Assistant Director of Community and Housing Services, following consultation with the Portfolio Holder for Strategic Housing, to use any unallocated grant from this source of grant funding during the year or make further adjustments and uplifts as necessary to ensure full utilisation of the grants, including any mid year Homelessness Prevention Grant top up, for 2027/28 and 2028/29 in support of existing or new schemes.

78/23

## **PARTICULATE MONITORING - PRE-SCRUTINY**

The Technical Services Manager presented options for additional particulate matter monitoring following a council motion. Current

provision included three low-cost sensors in the Bromsgrove District. The proposed options ranged from extending existing sensors to commissioning a source apportionment study with the University of Birmingham.

The recommended option e included a combination of extended sensors and a mobile “super site” study with an estimated cost of £150,000.

After the presentation, Members raised the following comments and discussions:

- If there were grant funding opportunities from Central Government? Members were advised that there was no current government funding available which had been withdrawn in 2024.
- Further explanations were requested on the cost implications for the recommended option shown within the report. Officers provided clarity that the monies would be used for the purchasing of the necessary equipment, servicing and maintenance.
- Was there a potential liability/risk if the Council did not push forward with the proposals? Clarification was provided that the overall responsibility for particulate matter reduction lay with Central Government but was an opportunity for the Council to review in more detail at the levels within the District.
- If there were opportunities for Section 106 money contributions, taking legacy benefits into consideration? In response Officers explained that the suggestion would require a change in policy. The Leader of the Council added that it was important that there was no delay in progressing the works which had already been agreed at the Cabinet Working Group and was an essential requirement for residents within the District.
- Members noted public health implications and reputational benefits of proactive monitoring.
- The Chairman expressed the view that the wording in the report regarding the electrification of the vehicle fleet was misleading. Clarity was also provided on the electrification of vehicles which would see brake emissions fall, while tyre emissions were expected to rise.
- There was a recommendation suggested from a Member to seek monies from the Legacy Budget. However, the Leader explained that the monies allocated were required for other significant challenges faced by the Council.

**RECOMMENDED** that

The Cabinet RECOMMEND that:-

- 1) Additional monitoring of Particulate Matter (air pollution) be delivered as set out in Option E below (3.5); and
- 2) A further report be brought back to Cabinet once final costs have been identified.

79/23

## **LEVELLING UP FUND PROGRAMME (QUARTERLY UPDATE)**

The Regeneration Project Delivery Manager updated the Board on the levelling up fund Windsor Street and Nailer's Yard projects.

The following key points were raised:

Windsor Street:

- a) Phase Two remediation required six months for treatment and six months for monitoring works.
- b) Cabinet had agreed the site redevelopment for housing via partnership with a Registered Social Landlord (RSL).

Nailer's Yard:

- a) Construction was progressing with completion expected in May 2026.
- b) Bruton Knowles had been appointed as property management agent for the commercial building.
- c) The Pavilion building operational model was under review.

Members questions and comments were as follows:

Windsor Street:

- What were the timeframe and costs for the groundwater treatment options as suggested feedback from Environment Agency (EA)? Officers explained the timeframe for Phase One and Phase Two as detailed in the report and reassured Members that although works would take six months for treatment works and six months for monitoring, there would be continuing progression with the project in other areas, such as applying for planning permission. Members were also advised that the works would be within budget for Phase Two remediation works.
- Members requested that the Board be included in updates for the RSL options, prior to Cabinet considerations. Further discussions were also raised that considerations for a local provider may be more beneficial for residents, particularly when reporting issues. In response the Executive Director explained that the options for selecting the suitable contractor was in progress, however, local needs would be a consideration.

Nailers Yard Site:

- Members noted that property agents Bruton Knowles had been appointed to undertake the property management of the commercial building but requested clarity on who would manage the Pavilion Buildings. In response the Board was advised that an operational model was being put in place to explore options

such as managing inhouse and considerations for third party involvement.

- Concerns were raised that GJS Dillon were continuing to receive enquiries for the commercial building, but no tangible lettings had been received. It was explained that due to delays in appointing Bruton Knowles, there had been some delays with progression, however, Officers were hopeful that an update could be provided at the next meeting in February 2026.
- An update with regards to progression with the release of the restrictive covenant was also requested by Members. It was explained by the Leader that conversations were in progress to escalate the matter and that an update would be provided to the Board. Further discussions continued with Members suggesting that delays with the progress of the covenant release and operational management of the Pavilion should be included as a risk to the Council which was noted by Officers.
- Members also requested an update on progress for the culvert works and costs associated for the project. Officers informed the Board that works to the culvert were progressing as per the current programme for 4<sup>th</sup> May 2026 completion. Weather conditions may lead to delays due to the works being carried out in the winter. The Project Manager explained that one complaint had been received from a local resident about the noise from the pumps but this was now resolved with Kier installing acoustic fencing.

The Leader and Officers concluded discussions and were pleased to inform the Board that a representative from the Ministry of Housing, Communities and Local Government (MHCLG) had visited the Windsor Street and Nailers Yard site. The representative provided positive feedback, noting that the works were progressing well and highlighted that having a set completion date was a significant achievement when comparing progress made by other Local Authorities.

**RESOLVED** that the update on the progress of the Levelling Up Fund projects be noted.

80/23

## **LOCAL HERITAGE ACTION LIST (QUARTERLY UPDATE)**

The Principal Conservation Officer presented progress of the Local Heritage Action Lists to the Board.

The key points raised were as follows:

- Four parishes had adopted local heritage lists.
- The Bromsgrove draft list was expected mid-January 2026.
- Recruitment was underway for full time Conservation Officer who was due to start in March 2026.
- There had been an increase in development management workload.

Following the update, Members raised concerns about delays and the potential disadvantages to areas without local heritage listings being established. However, Officers reassured Members that non designated heritage assets were considered and would be picked up during the planning decision stage.

During discussions concerning the lack of resources to work on the lists and the recruitment of consultants, it was queried if additional consultancy would also be sourced for the impending increase in workload for the Local Plan. The Executive Director advised that work capacity was being reviewed by Senior Officers.

**RESOLVED** that the update on the progress of the Local Heritage Action List be noted.

81/23

## **WORCESTERSHIRE HEALTH OVERVIEW AND SCRUTINY COMMITTEE - UPDATE**

The Worcestershire Health Overview and Scrutiny Committee (HOSC) representative, Councillor B. Kumar had sent his apologies to the Board for the meeting. It was agreed that any queries, following consideration of the update provided and included in the agenda, would be deferred to the next meeting held in February 2026.

**RESOLVED** that the Worcestershire Health Overview and Scrutiny Committee (HOSC) update be noted.

82/23

## **FINANCE AND BUDGET WORKING GROUP - MEMBERSHIP REPORT AND UPDATE**

After consideration of the Finance and Budget Working Group Membership report and terms of reference the board agreed to the proposed membership of the working group for the 2025/26 municipal year.

**RESOLVED** that the Finance and Budget Working Group Membership Report be noted.

83/23

## **CABINET WORK PROGRAMME**

Following consideration of the Cabinet Work Programme, Members requested and it was agreed that the inclusion of the Planning Advisory Service (PAS) findings report would be added to the Cabinet Work Programme.

**RESOLVED** that the content of the Cabinet Work Programme be noted as per the preamble above.

84/23

## **OVERVIEW AND SCRUTINY BOARD WORK PROGRAMME**

The Overview and Scrutiny Board Work Programme was considered by Members.

The following discussions were raised:

- Capacity of the Minor Works Team – The Chairman expressed his frustration at the lack of progress regarding his request for a report to consider the capacity of the Minor Works Teams. It was agreed that a meeting would be set up to discuss relevant details further with the Leader, Chairman of the Board and relevant Officers.
- Local Government Reform (LGR) - Regular updates was requested for the Boards' consideration which was noted by Officers.

**RESOLVED** that the Overview and Scrutiny Work Programme be noted as per the preamble above.

85/23

## **OVERVIEW AND SCRUTINY ACTION SHEET**

The Overview and Scrutiny Action Sheet were considered by the Board.

Frustrations were raised by the Chairman regarding delays in progression for the update on Electric Vehicle (EV) Charger profit sharing arrangement negotiations. Members noted that a meeting had been held with the Leader and relevant Officers to discuss progression. Members noted that a briefing paper would be provided to Members of the Board at the next meeting to be held in February 2026.

**RESOLVED** that the Overview and Scrutiny Action Sheet be noted.

86/23

**TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR LEGAL DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIRMAN, BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT MEETING.**

There was no urgent business for consideration.

The meeting closed at 7.45 p.m.

Chairman

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# Planning Service Review

## Bromsgrove District Council

January 2026

*Final report*

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## 1. Executive Summary

- 1.1. In light of the significant reforms introduced through the Levelling-Up and Regeneration Act 2023, the Planning & Infrastructure Act 2025, and updates to the national planning policy framework (NPPF), the Bromsgrove chief executive, in agreement with the council Leader, has commissioned this independent review of the council's planning service to ensure it is well placed to meet the challenges ahead. The review, carried out by Planning Advisory Service (PAS) is also in recognition of the need to support councillors and officers in responding to the forthcoming legislative changes, the requirement to deliver a new local plan, and the historical challenges experienced in progressing plan-making.
- 1.2. This review examines Bromsgrove District Council's local plan production process and the development management (DM) decision-making framework. There are areas of good practice but also significant challenges arising from changes in political control, a local plan last adopted in 2017, development pressures, and the evolving national planning policy reforms. The challenges are shared across different parts of the planning service and are of a systemic nature requiring councillors, officers, and the senior leadership of the council to take collective responsibility for resetting relationships and rebuilding trust, so that the corporate focus can be on delivering better planning outcomes.
- 1.3. The service operates in a complex environment. Development needs to be delivered against a backdrop of significant infrastructure challenges and 90% of land designated as green belt. Local plan policies are open to challenge for being out of date, housing need has recently doubled, and housing land supply is just 2.24 years. This increases the risk of speculative development and planning decisions by appeal. National planning reform adds further complexity, with a [new gateway-based plan-making system](#) requiring a disciplined, collaborative and well-managed approach.
- 1.4. These pressures sit alongside considerable political and structural change. The council moved to no overall control (NOC) in May 2023, introducing new political dynamics and making the need for cross-party collaboration more important than ever. Local government reorganisation (LGR) is having a tangible impact on the council's day-to-day operations, mainly through increased demands on leadership and officer capacity. The differing positions on the preferred model for reorganisation (Bromsgrove/most districts supporting a two-unitary option while the county council favours a single authority) will add a tension to the working relationship between the districts and the county council. The PAS review team are encouraged therefore by the Bromsgrove chief executive's commitment and efforts to engage with their county council counterpart.
- 1.5. Development management processes are broadly very sound, but opportunities for early engagement between councillors and officers are being missed. Pre-application discussions and site visits are underutilised, and interaction between councillors and officers outside of planning committee is limited. This results in issues which could be resolved earlier often surfacing at committee leading to lengthy debates and reinforcing a sense of tension rather than collaboration.
- 1.6. Governance arrangements have been updated seeking to keep pace with the demands of the changed political environment. This is an important step and part of process of addressing evidence of siloed and fragmented engagement. These updated arrangements are still bedding in, so it important that processes are followed consistently to support collaboration and collective ownership of issues. Planning is increasingly perceived through a party-political lens rather than as a shared corporate priority and there is still work to do to rebuild levels of trust and mutual respect between councillors and officers. These dynamics are in now in sharp focus as the council develops its updated local plan - despite the Full Council agreement to publish a draft development strategy consultation in summer

2025, the consultation strategy and draft local plan do not enjoy the support of many councillors.

- 1.7. There are significant obstacles to meeting the current LDS timetable, not least the absence of national plan-making regulations and the ongoing impact of preparations for local government reorganisation (LGR). Despite the uncertainty, the council is making progress — including the recent consultation on the draft development strategy, however the plan-making timetable needs to accelerate substantially while managing several key issues.
- 1.8. These include embedding governance arrangements that should foster cross-party consensus. For the local plan, it means developing a compelling spatial vision, completing the evidence base, and continuing with and formalising relationships with key partners—particularly Worcestershire County Council—are essential steps. Above all, the council must create an environment where behaviours reflect shared goals rather than individual or political agendas.
- 1.9. Planning is a key corporate risk, and the political leadership and senior management understand that getting the local plan in place will require supporting and enabling officers and councillors to make the difficult but necessary decisions. This is against the backdrop of many wider and significant corporate and strategic challenges beyond planning like LGR and balancing the books in a difficult fiscal environment.
- 1.10. The challenges identified represent clear opportunities for improvement, but being broadly systemic in nature, they need more than technical fixes alone. They require a reset that prioritises collaboration, shared responsibility, and a united response across the council. Both councillors and officers need to work together and use the strategic planning steering group (SPSG) and senior leadership team (SLT) meetings to establish a constructive dialogue supported by transparent processes and timely information sharing. By embracing these principles, the council can restore confidence in the planning service decision-making processes, and work towards ensuring that development is plan-led, infrastructure-supported, and aligned with community needs.
- 1.11. Bromsgrove's planning service stands at a critical juncture. The leadership and senior management of the council have a clear opportunity not only to address current risks, but also to set a new tone for how councillors, officers, and senior leadership work together—collectively taking responsibility for how planning shapes the future of the district.

## 2. Key Recommendations

- 2.1 These recommendations are interdependent and mutually reinforcing. Several recommendations are cross-cutting and arising from both the decision-making and plan making review. The service review is encouraged to address these recommendations in a suitably joined up manner. Success will require sustained political leadership, cross-party commitment, adequate resources, improved risk management, and a fundamentally different approach to the challenges ahead.
- 2.2 It is important that these recommendations form part of a service / improvement plan that is clear about 'what success looks like'. This will help to ensure that the recommendations in this report are in context and aligned to a clear set of outcomes and measures.

Decision making	
RDM1	<p><b>There is an urgent need for a reset in the relationships and interaction between councillors and officers.</b> This is essential to improve collaborative working between officers and members that will improve the quality of decision-making. All the mechanisms and processes are in place to enable this but are not being used as widely and effectively as they could be. This should be led and given the highest priority by senior managers and political leaders with buy-in from all political groups as well as the planning team.</p>
RDM2	<p><b>Recommendation: Strengthen and formalise councillor planning training</b></p> <p>The council should establish a comprehensive and structured programme of planning training for both planning committee members and ward councillors, designed to strengthen defensible decision-making, clarify roles and responsibilities, and ensure decisions are made within a clear legal and governance framework. The training should be mandatory for committee members.</p> <p>This programme should include the following components:</p> <ul style="list-style-type: none"> <li>• <b>Defensible decision-making training for planning committee members</b>, based on the PAS <i>Defensible Decision-Making</i> resource and, where appropriate, the use of relevant case studies. The purpose of this training is to ensure committee members are fully aware of their statutory role and responsibilities, to reinforce the principles of sound, evidence-based decision-making, and to reduce the risk of challenge. It is recommended that this element of the training is delivered by a suitably experienced external consultant to provide independence and specialist expertise.</li> <li>• <b>An ongoing programme of training for planning committee members focused on emerging national and local planning issues</b>, developed alongside the council's existing annual training offer. This should include briefings on new and evolving forms of development (for example, grey belt development and battery storage) and reinforce understanding of how key policy concepts, including the application of the '<i>tilted balance</i><sup>1</sup>', should be applied in decision-making.</li> </ul>

<sup>1</sup> Planning Legislation requires planning decisions to be made in accordance with the Development Plan as a starting point, and balance this with all other material considerations. Paragraph 11 of the NPPF, under the 'presumption in favour of sustainable development', sets out circumstances where this balancing exercise should be weighted towards granting permission. This is the case where there are no relevant policies in the Development Plan, or the relevant policies are 'out of date' including where the council cannot demonstrate a five-year supply of deliverable housing sites. These circumstances become a material consideration, which 'tilts' the balancing exercise from a neutral balance to one where there must be compelling reasons for permission to be withheld.

	<ul style="list-style-type: none"> <li>• <b>A dedicated programme of planning training for ward councillors</b>, aimed at improving understanding of how councillors can appropriately influence planning decision-making, the limits and parameters of that influence, and the wider council context within which planning decisions are taken. This training should cover the legal framework governing planning decisions, the importance of decisions being robustly evidenced, and ensure councillors are fully cognisant of the council's code of conduct and constitution as they apply to planning matters. The programme should also include an overview of the role of planning enforcement and how it interacts with planning decision-making.</li> </ul>
RDM3	<p><b>To continue exploring ways of working more effectively with Worcestershire County Council (especially highways).</b></p> <p>The need to cultivate better joint working and engender a more effective role within the decision-making process is recognised by the council. The Bromsgrove chief executive is encouraged to continue to engage with their counterpart at Worcestershire County Council and establish clear expectations and deliverables. This may be achieved via a memorandum of understanding (MOU) regarding highway matters, developed by the planning service with the support of the executive director and chief executive.</p>
RDM4	<p><b>To undertake a review of the processes and performance monitoring associated with planning enforcement.</b> This should be undertaken with a specific emphasis on improving the interaction between the investigating officers and the planning officers responsible for undertaking planning assessments, as well as on how this work is prioritised. In terms of performance, a key objective of planning enforcement is to resolve as many breaches as possible without serving a notice, and that should be seen as a positive outcome and not a negative one. Performance data and 'numbers of notices served' is not the best indicator of performance – reporting on cases opened and resolved would be a better indicator.</p>
RDM5	<p><b>To undertake a review of officer presentations to the planning committee.</b> This is to ensure that officer presentations are proportionate and provide a greater focus on identifying what are the key issues to assist committee member's consideration.</p>
RDM6	<p><b>Review the quality of streaming of planning committee meetings and the timescale for retention of recordings.</b> This needs to be aimed at identifying ways of improving the viewing experience, taking note of best practice elsewhere. Previous legal advice around the retention of recordings should be revisited to ensure that the recordings are retained until they cease to perform any useful purpose.</p>
RDM7	<p><b>To provide greater encouragement for councillors to contribute to pre-application work and to explore how interaction between councillors and officers outside of the planning committee more generally can be improved.</b> This should involve reviewing the operation of existing procedures to understand why they are not leading to greater interaction, and how further opportunities can be encouraged. This should be supplemented by reinforcement by senior officers and political party leaders of the importance and benefits arising from greater officer-councillor engagement in planning matters more generally.</p>
RDM8	<p><b>To undertake a review of the planning committee site visit process to encourage better attendance.</b> This should explore and seek to resolve the issue of poor attendance, including reviewing the timing and number of accompanied site visits undertaken.</p>

Local Plan Review	
RLP1	<p><b>Build political consensus.</b> Reflect upon the challenges arising from the draft development strategy consultation approach and identify lessons learned. Facilitate an impartially chaired cross-party workshop of all councillors/and or the strategic planning steering group (SPSG) to address concerns about process, rebuild consensus, and develop understanding of risks relating to the 'tilted balance' (see recommendation RDM2 above). This will empower elected members to communicate a strong positive vision for the district's future and consider 'macro' district-wide benefits rather than just 'micro' ward impacts.</p>
RLP2	<p><b>Review the operation and terms of reference for the strategic planning reference group (SPSG)</b> to improve governance arrangements and support a genuine cross-party local plan member working group. A review should include:</p> <ul style="list-style-type: none"> <li>• Defined membership proportionate to group sizes (not open attendance).</li> <li>• Requirement for continuity of attendance (named councillors with named deputies).</li> <li>• Clear terms of reference including collective responsibility for recommendations and efficient administrative arrangements.</li> <li>• Authority to make recommendations to cabinet/full council.</li> <li>• Regular meetings with effective and efficient administrative arrangements. which minimise demands on planning policy officers.</li> <li>• Impartial chairing by the council leader or assistant director rather than portfolio holder to emphasise the corporate priority.</li> <li>• End/avoid separate political group briefings and ensure all members receive the same information simultaneously.</li> </ul>
RLP3	<p><b>Develop the strategic spatial vision and complete evidence base.</b> Urgently complete an up-to-date green belt assessment and establish an agreed spatial vision and approach to guide development of a preferred spatial strategy. Commission spatial master planning work and utilise design coding to illustrate what development could look like, moving beyond allocation boundaries to show placemaking, design quality, and community integration. Ensure employment, retail, community facilities, and green infrastructure receive equal prominence to housing .in future iterations of the draft plan. Organise councillor site visits to exemplar developments.</p>
RLP4	<p><b>Secure infrastructure delivery commitments as a priority.</b> Build on chief executive-to-chief executive engagement with Worcestershire County Council with clear expectations and deliverables. Create a formal memorandum of understanding for transport planning support with agreed timescales and escalation procedures. Work closely with the county council to jointly identify solutions and agree future plans to fund and deliver new and enhanced education provision to serve planned growth. Produce a robust infrastructure delivery plan (IDP) endorsed by all providers. Consider adoption of community infrastructure levy (CIL) and explore front-loading of developer contributions.</p>
RLP5	<p><b>Strengthen Programme Management and Resources.</b> Develop a comprehensive project plan aligned to <a href="#">the new planning system</a> Gateway requirements, showing all tasks, critical path dependencies, resource allocation, and realistic contingency. Undertake capacity assessment of the planning policy team and secure additional resources (e.g. Assistant Directors have been proactively asked and reminded to submit budget bids, including bids for additional capacity) where needed. Implement regular progress monitoring and actively maintain risk register. If May 2028 target proves to be unachievable through detailed planning, revise and republish the local development scheme (LDS) with realistic timescales.</p>



RLP6	<b>Continue active senior leadership support.</b> Use the corporate risk register to reinforce and recommunicate that the local plan is a key corporate risk. There should be regular progress reporting to the senior leadership team from the assistant director and the strategic planning manager. Chief executive and executive director should keep a dialogue going with planning policy officers and attend key meetings where appropriate to provide their support where required. Reinforce clear protocols for engagement and councillor-officer interaction and ensure group leaders take responsibility for councillor's following them and continue to provide wellbeing support for planning officers.
RLP7	<b>Introduce a training and support programme for councillors.</b> Establish training for all councillors on the role and importance of the local plan to reduce future risk and enable more effective and collaborative approaches to plan progression in the future. Councillors require sufficient training and strong political group leadership to support them to fulfil their roles appropriately for the long-term benefit of the electorate and the district as a whole. In short, members need to be supported to make politically very difficult decisions.



## 3. Scope of the service review

- 3.1 Considering the significant changes being introduced through the Planning & Infrastructure Act 2025, the Levelling-Up and Regeneration Act (LURA) 2023, and updates to the national planning policy framework (NPPF), the Bromsgrove chief executive has taken the opportunity to reflect on how well its planning service is positioned to respond, especially in light of the council's need to produce a local plan, and the historical challenges experienced in progressing plan making. This is a timely chance to consider the council's overall approach to planning—examining decision-making, the effectiveness of councillor–officer working relationships, and the adequacy of support and training arrangements—benchmarking these against current best practice.
- 3.2 To support this, the council has commissioned the Planning Advisory Service (PAS) to undertake an independent review of its decision-making and plan-making functions. Rather than focusing on detailed processes or management structures, the review explores how effectively governance, people, and systems currently work together to enable sound planning decisions and to progress the production of an up-to-date local plan. The aim is to identify strengths to build on and areas where improvement is needed, ensuring the council is well prepared for the demands of the district and the reformed planning system.
- 3.3 It is important to recognise that this service review is not an inspection or an investigation; it is a 'critical friend' review, forward-looking, improvement-focused and designed to complement and add value to the council's own performance and improvement plans. The review is not designed to provide an in-depth or technical assessment but for the members of the peer team to draw on their experience and knowledge and reflect on the information presented to them and what they observed and heard during a series of on-site interviews.
- 3.4 This report is a summary of the review team's findings. Naturally, the review process represents a snapshot in time and will inevitably touch on things that the council is already addressing and progressing. The intention is to offer constructive challenge and practical recommendations that prioritise actions and focus future improvement work more effectively.
- 3.5 The PAS team thanks the councillors and officers for their open, honest and constructive responses during the service review process. All information collected is on a non-attributable basis. The team was made very welcome and would especially like to mention the invaluable organisational assistance and excellent onsite support provided by Susan Tasker (PA to Chief Executive and Office Services Manager), Angela Yale (PA to Ruth Bamford, Assistant Director of Planning Leisure & Cultural Services), and Sarah Carroll Senior PA.

## 4. Planning Advisory Service (PAS)

- 4.1 PAS is a Local Government Association (LGA) programme which is funded primarily by a grant from the Ministry of Housing Communities and Local Government (MHCLG).
- 4.2 PAS's principal mission is to ensure that local planning authorities (LPAs) are continuously improving in their execution and delivery of planning services.
- 4.3 To achieve this, the PAS work programme focuses on:
- a) Helping local government officers and councillors to stay effective and up to date by guiding them on the implementation of the latest reforms to planning.
  - b) Promoting a 'sector-led' improvement programme that encourages and facilitates local authorities to help each other through peer support and the sharing of best practice.
  - c) Providing consultancy and peer support, designing and delivering training and learning events, and publishing a range of resources online.
  - d) Facilitating organisational change, improvement and capacity building programmes – promoting, sharing and helping implement the very latest and best ways of delivering the planning service.
- 4.4 PAS also delivers some of its services on a commercial basis, including change and improvement programmes for individual and groups of planning authorities in England, Scotland, Wales and Northern Ireland.

## 5. The peer team.

- Councillor Judy Emanuel – Uttlesford District Council (Independent)
- Councillor Linda Robinson – Wychavon and Worcestershire CC (Conservative)
- David Coleman – DAC Planning
- Tim Burton – timburtonplanning

## 6. Decision Making Review

### Scope and purpose

- 6.1 Planning Advisory Service (PAS) has been commissioned to undertake a review of planning committee decision-making at Bromsgrove District Council ('the council'). The review has examined decision making with a focus on the interaction and relationships between officers and members throughout the process, rather than a detailed review of processes and management.
- 6.2 The primary objectives of the review are to:
- Assess the effectiveness of governance arrangements.
  - Evaluate the working relationships between officers, members, and external partners (particularly Worcestershire County Council).
  - Identify barriers to successful decision-making.
  - Provide practical recommendations to strengthen the decision-making process and improve the likelihood of successful outcomes.

### Key challenges

- 6.3 During its work, the review team found that the development management (DM) service has a comparatively stable team and whilst individual caseloads are high, officers are not generally overwhelmed. The service is well managed, motivated, and dedicated to delivering a high-quality planning service.
- 6.4 Bromsgrove District Council faces a particularly challenging set of circumstances:
- **Political Context:** The council operates under no overall control (NOC), with Conservatives as the largest group but without an overall majority. Political groups include Conservatives, Liberal Democrats, Labour, and two Independent groups. Elections are held on an all-out basis every four years, with the next elections due in May 2027.
  - **Policy Context:** The Bromsgrove District Plan is now significantly out of date. The plan was adopted in 2017 and is approaching the end of its plan period (2030). More significantly, the council is unable to demonstrate a five-year housing land supply. As of 1 April 2025, the council can demonstrate only 2.24 years of deliverable housing land supply for the period 1 April 2025 to 31 March 2030. This means that the "tilted balance"<sup>2</sup> under paragraph 11(d) of the national planning policy framework (NPPF) applies to decision-making on planning applications, significantly increasing the risk of speculative development proposals being received and approved on appeal. The introduction of the revised [standard method](#) for calculating housing need as part of the has also resulted in a significant increase in local housing need in Bromsgrove from 383 dwellings per annum (dpa) to 715 dpa.
  - **Green Belt:** Bromsgrove has extensive green belt coverage (approximately 90% of the district). Release of green belt land for development has historically been highly

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<sup>2</sup> Planning Legislation requires planning decisions to be made in accordance with the Development Plan as a starting point, and balance this with all other material considerations. Paragraph 11 of the NPPF, under the 'presumption in favour of sustainable development', sets out circumstances where this balancing exercise should be weighted towards granting permission. This is the case where there are no relevant policies in the Development Plan, or the relevant policies are 'out of date' including where the council cannot demonstrate a five-year supply of deliverable housing sites. These circumstances become a material consideration, which 'tilts' the balancing exercise from a neutral balance to one where there must be compelling reasons for permission to be withheld.

controversial and politically contentious. The introduction of the "grey belt"<sup>3</sup> concept in the NPPF adds further complexity.

- **Infrastructure concerns:** Bromsgrove faces significant infrastructure capacity challenges, particularly regarding secondary school provision, highways capacity, healthcare facilities, and surface water drainage. These constraints are a major source of public and political concern.

6.5 These circumstances create a tension for councillors between the national and local policy protections afforded to the green belt and central government's reform agenda, which seeks a step change in housing delivery. Decisions on major development—particularly new housing—are high-profile and often highly contentious, with proposals frequently attracting significant community opposition.

6.6 In the challenging circumstances outlined above, there is a heightened likelihood of planning decisions being subject to rigorous scrutiny and challenge. It is therefore essential that officers, councillors, and committee members work together to ensure decisions are based on sound judgement. Issues should be clearly understood by officers and councillors in advance of discussion or determination at planning committee.

6.7 The service has previously been at risk of designation (government intervention in decision making) for quality of decision-making for major applications. This is no longer the case as performance has improved in recent years supported by good performance monitoring – an essential part of ensuring that improvement is maintained.

## Approach

6.8 The review was conducted in two distinct phases over a three-week period in October and November 2025:

- **Phase 1: Desk-based review (31 October – 12 November 2025)**

A review of documentation was undertaken to establish a baseline understanding of the council's processes and the key issues affecting decision making.

- **Phase 2: Engagement meetings (13-14 November 2025)**

Two full days of structured engagement sessions were held with key stakeholders at Bromsgrove District Council offices. In total, over 17 hours of direct engagement was undertaken with over 50 participants. The sessions were structured to enable each group to speak freely about their perspectives and concerns.

- Please refer to **Appendix 1** for full details of the documents reviewed and the interviews.

## Key issues and risks

6.9 This section sets out the key issues and risks identified through the review, together with recommended mitigation measures for the council to consider. The issues are presented thematically, though it should be recognised that many are interrelated and cumulative in their impact.

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<sup>3</sup> (NPPF December 2004 Annex 2: Glossary) Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

## Councillor engagement in the decision-making process

- 6.10 A councillor's role in decision-making should start before the planning committee meeting. Involving councillors early in the process for major schemes or those that could prove particularly contentious, for example during pre-application discussions, can help applicants not only better understand the application of planning policy, but also local priorities and community views, providing insight into how a development may be received before a formal application is submitted. Furthermore, if councillors are involved at pre application stage then applicants have an opportunity to tailor suitable proposals to make them more acceptable which generally should improve relationships between applicants, the council and the community.
- 6.11 To support this approach, the council has a protocol in place which encourages councillor input to this process without the risk of predetermination. The protocol sets out clear criteria and guidance for councillor involvement, engagement and conduct. This document represents best practice, and the review team considers there to be clear opportunities to make sure more regular councillor participation is supported at this early and critically important stage of the process.
- 6.12 Some councillors may perceive engaging with developers as beyond their role or potentially at odds with community expectations, but this should not be viewed as a conflict. By following the protocol (see 6.11 above), ensuring that an officer is always involved and that all meetings are openly and transparently reported, councillor involvement in pre-application work will invariably lead to better outcomes for both proposed and existing residents. It also represents a good example of how officers and councillors can work together to improve planning outcomes. For this and the reasons set out in paragraph 6.10, greater involvement of councillors in pre-application discussions and consultations is therefore to be strongly encouraged.
- 6.13 Effective councillor–officer engagement should extend beyond formal discussion at planning committee. Councillors may wish to ask questions, explore issues, or test their thinking on applications, and these matters are often best addressed in advance of the meeting. At Bromsgrove, the committee agenda is published five clear working days prior to the meeting giving members the opportunities to contact officers. Officers also make themselves available ahead of committee meetings for this purpose. However, take up of these opportunities is limited and the reasons for this should be explored with a view to finding ways to encourage greater and earlier interaction.
- 6.14 There is a clear opportunity for councillors and officers to discuss the details of applications and to recognise and record the political sensitivities of major development proposals earlier, which could help ensure that concerns are identified and understood well before committee debates take place. Councillors and committee members are encouraged to take an earlier approach to engagement as it would support better-informed decision-making, encourage wider participation, and make sure that the process works more effectively for both members and officers. 'Councillors will avoid any risk of predetermination if they comply with advice on such matters provided in the council's pre-application protocol.
- 6.15 Planning committee meetings should be focused on addressing the key determining issues and material planning considerations relating to the planning application under discussion. The planning committees observed by the review team were dominated by meticulous scrutiny of very detailed points, many of which could have been discussed and resolved in advance of the meeting. This is not the best use of planning committee time and can result in members and officers unnecessarily appearing at odds with each other.

## Site visits

- 6.16 Carrying out site visits in advance of the committee meeting is beneficial to gaining an understanding of the context of a site and is an opportunity for councillors to ask officers questions and seek clarification. Therefore, the reintroduction of site visits (following their suspension during the Covid pandemic) is supported. The council has clear written procedures to ensure site visits are carried out appropriately which represents good practice. However, both officers and councillors agreed that site visits are often poorly attended. This is a missed opportunity to foster closer member-officer working relationships, and to address any issues earlier in the process. The timing of site visits is widely recognised as a contributory factor, and this is an opportunity to address that.
- 6.17 It can be difficult to find a perfect solution for the timing of site visits (they often need to take place during the working day). There may be an opportunity to review the timing of site visits. Consideration should be given to reducing the number of proposals requiring a site visit and focusing on schemes where a site visit adds the greatest value; some proposals will not be enhanced by a formal site visit, and some can easily be seen from public land, enabling councillors to visit independently at a time convenient to them. This is therefore an opportunity for the service to consider reducing the overall number of visits, which may then make it easier for councillors to attend. This should be combined with a reminder of the importance of attendance when site visits are scheduled.

## Enforcement

- 6.18 Several councillors are concerned and frustrated at what they regard as the ineffectiveness of planning enforcement, and particularly a lack of communication on enforcement cases. Officers informed us that a monthly email is sent to councillors regarding enforcement cases, so there is a disconnect here on communication. Enforcement investigations are often sensitive in nature and at times there is information that cannot be shared. This is an opportunity for officers to help councillors (perhaps via a re-launch of the monthly email) to better understand the circumstances, sensitivities and constraints on enforcement cases and what information can be shared and where it is not appropriate for them to become involved.
- 6.19 Enforcement investigations are undertaken by Worcestershire Regulatory Services on behalf of Bromsgrove council, with planning assessments then being carried out by planning officers within the development management team. Officers interviewed recognise the challenges of juggling enforcement assessments with their other work and that a review of how all work is prioritised will help ensure that delays are avoided or kept to a minimum. Consideration could be given to having a resource within the planning team dedicated to / focused on enforcement matters.
- 6.20 Councillors indicated that they would like to see additional performance information on planning enforcement which is linked to a view that low numbers of enforcement notices are being served. PAS would always encourage members to seek performance information and remind them that enforcement is about negotiating and assessing real planning harm and a key objective is to resolve as many breaches as possible without serving a notice, and that should be seen as a positive outcome and not a negative one. Performance data and 'numbers of notices served' is not the best indicator of performance – reporting on cases opened and resolved would be a better indicator.



## The Planning committee

- 6.21 The Planning Advisory Service undertook a review of the council's planning committee procedures in early 2023. This concluded that *"from the information available and observation of the two committees, the meetings appear to be well managed and demonstrate good teamwork from the committee chair, planning officers and the democratic services staff. The production of the meeting is carried out professionally, and the democratic services staff ensure that the technology and process are working as planned."* Notwithstanding this, the report did make several recommendations, the majority of which have since been implemented.
- 6.22 As alluded to in para 6.15, planning committee meetings tend to focus on scrutinising the finer details of proposals at the risk of spending less time addressing more strategic issues and making the meetings unnecessarily drawn out. This may be partly driven by a lack of engagement between officers and members prior to the committee meeting. Where members attend committee meetings with unresolved questions or issues in their minds, it often leads to a high level of question and debate at committee – often on less important points of a proposal. The review team think this is a significant contributory factor to what it heard described as 'nervousness' and a 'lack of trust' between officers/councillors.
- 6.23 Closer working between officers and members outside of the committee forum as recommended will go a long way towards resolving issues prior to committee, as well as resulting in a collaborative approach where officers and members can get 'on the same page' and/or understand where the key areas of contention will be. This will have the knock-on benefit of focussing discussions at committee solely to the important planning considerations, rather than those detailed matters that are more appropriately addressed elsewhere / through other legislation.
- 6.24 The leadership role of ward councillors and how they represent their constituents can be particularly challenging in relation to contentious or high-profile planning decisions. In some cases, councillors' public comments and the lodging of appeals by applicants against non-determination (the council not making a decision within a specified period) on key sites highlight the difficulties and complexities involved in confidently reaching timely decisions. These circumstances present opportunities for officers and councillors to work together to strengthen understanding, communication, and confidence in decision-making processes.
- 6.25 When asked, several members of the planning committee see their role as being advocates on behalf of the community. This is their prerogative but has consequences for that member's quasi-judicial role on planning committee. There is a resultant need to embed a greater understanding of the function of the planning committee to highlight its role in delivering the council's planning agenda as a whole and not just in the interests of individual wards.
- 6.26 The chair of the planning committee undertakes their duties competently and the review team believe there are opportunities and benefits to be had from the chair guiding committee members more strongly in appropriate circumstances.
- 6.27 An effective chair–vice-chair partnership is central to the smooth operation of the planning committee, before, during, and after meetings and to will help ensure clarity, transparency, and confidence in decision-making. Ahead of meetings, it is good practice for the chair and vice-chair to review applications together, identify items likely to generate debate, and agree on how to manage these constructively. During meetings, the vice-chair plays a vital supporting role—tracking speakers, noting potential conditions, and helping to 'read the room' so discussions remain focused and inclusive. Afterward, reflecting jointly on the

meeting's outcomes and public perception strengthens accountability and continuous improvement. This collaborative approach goes beyond deputising in the chair's absence; it fosters two-way communication and constructive feedback, benefiting even the most experienced chair and ensuring the committee operates at its best.

- 6.28 The introduction of online streaming of the meetings is a positive step forward, and the service should now work on improving the quality of the broadcast. It is often not possible to identify the person speaking and officer presentation material is not displayed. This reduces the effectiveness of the visuals and subsequently the viewers experience. As a result, the proceedings can appear confusing for those that do not regularly attend the meetings in person. It is recommended that the council observes the streaming of meetings elsewhere with a view to improving the quality of its own stream.
- 6.29 Furthermore, the recording of each planning committee meeting is removed as soon as the minutes are approved and this conflicts with good practice elsewhere. Whilst there may be no reasonable justification for retaining the recordings in perpetuity, this approach means the recordings are often deleted before the relevant decision notice is issued and inevitably before the deadline for the submission of an appeal or to seek a judicial review. For these reasons it is suggested that the council considers retaining the recordings for a longer period of at least six months.
- 6.30 The council has clear procedures for how alternative motions (for example where councillors might come to a different decision than officers) should be dealt with and the circumstances where an adjournment may be appropriate. Planning committee members would like to understand what more support they can expect to receive in such circumstances.
- 6.31 When proposing an alternative motion, it is the responsibility of committee members to identify and set out their reasons. This is not an officer's role; officers are there to advise councillors on the soundness of those reasons and to finesse the precise wording of those reasons if necessary. There is no evidence from viewing recordings of recent meetings to suggest that this is not happening, but it is important that officers are seen to be being helpful in this sense. Whilst the democratic services team accepted that there has been a rise in adjournments being proposed to agree reasons for refusal recently, this should not be a common occurrence and avoided whenever possible to reinforce a sense of transparency in decision-making.
- 6.32 The council has a protocol on appeals where a decision has been made by the committee that is contrary to an officer recommendation. This includes consideration of who is the most appropriate person to defend that appeal. There may be circumstances when the case officer is the most appropriate person to do this, but normally it would be preferable to avoid this. This has been raised as an issue and whilst a detailed review of cases has not been undertaken, it is important that consideration continues to be given to the most appropriate approach on a case-by-case basis.
- 6.33 Officer presentations to the planning committee are comprehensive and as a result can be quite long. There should always be a balance between providing councillors with the full details of all issues raised and a focus on what are the key ones for their determination. On balance, it is felt that the presentations are currently too focussed on ensuring that they are comprehensive to the extent that they are not highlighting sufficiently what are the most important considerations. Finishing the presentation with a summary slide with bullet points identifying key issues for councillors to consider in the overall planning balance may help give more focus to the subsequent debate.
- 6.34 Councillors have concerns about the late giving of apologies and the submission of late information, influenced by a few recent occurrences. The review team is satisfied that the council already has appropriate guidance in place. However, it may be beneficial to



remind those involved of the need to provide as much notice as possible if they cannot attend a meeting and to ensure sufficient time is allowed to consider any information received following the publication of the officer report. Decisions on whether a late item should remain is a matter of judgement based on individual circumstances. Whilst the idea of introducing an earlier fixed cut off for late information may seem attractive, it could unintentionally delay the determination of some proposals unnecessarily.

## **Committee training and development**

- 6.35 Whilst the protocols and procedures in place for the operation of the planning committee are clear and robust, it remains important that all concerned are regularly reminded of their existence and how they can be accessed. Many of the issues raised during the PAS interviews are covered in these documents. This implies that some councillors are not fully aware of what is in place to assist and support them in their role. There would be benefit in clarifying how all councillors in their various roles should engage appropriately with the planning decision-making process and this could be provided using the PAS defensible decision-making training module.
- 6.36 Planning committee members receive annual mandatory planning training to ensure they are kept up to date with key issues, policy and legislation. This includes training on the scheme of delegation and involvement in pre-application discussions, the call-in procedure and probity and conduct issues. This represents good practice, and a crucial element of ensuring that councillors understand the key aspects of their role and remain up to date.
- 6.37 It is important that training also addresses the various emerging changes to the legislative and policy framework, as well as new forms of development that are coming forward in the area. The council has already provided training on the grey belt and should also consider training on other topics e.g. battery energy storage systems (BESS).
- 6.38 There is a need to ensure that there is available time at the planning committee to review decisions and appeals in addition to performance monitoring information. Regular meetings to review the performance of the planning committee is also good practice.

## **Communication/escalation of issues**

- 6.39 There is a disconnect that needs addressing in terms of the collective ownership by of planning issues raised. Mechanisms for councillors to raise concerns with the planning team, and how issues are escalated need to be reinforced and better understood. Circumstances that led to the leader of the council raising an issue on environmental impact assessment (EIA) with the Secretary of State, rather than resolving the issue within the council is one such example.
- 6.40 A breakdown in trust in the transport advice provided by Worcestershire County Council has resulted in several major housing proposals being refused contrary to that advice and subsequently being allowed on appeal. Whilst the council's appointment of an independent transport consultant is noted, this is treating the symptom and is not the best means of creating a satisfactory and sustainable solution to improve the relationship issue. Issues with this relationship were apparent and raised at the time of the previous PAS review, but little seems to have changed. This is a corporate risk to the council in terms of delivery of its overall planning strategy. Therefore, there is an urgent need for a reset in the relationship. This should be led and afforded a higher priority by senior managers. The highways authority, where they have provided specific advice, should be represented in person at planning committee meetings where potentially controversial applications are being considered. This should be addressed through a service level agreement.

- 6.41 Councillors take the opportunity to pass on complaints from their residents to officers, but this appears to be the extent of their involvement. There would be benefit from having a more collaborative approach to the resolution of complaints, with councillors taking a more active role, working alongside officers where it is deemed appropriate.
- 6.42 In cases where it is clear from an early stage that a proposal will be controversial and likely to involve significant levels of correspondence and interaction with the community affected, a more proactive approach should be taken. Officers should work alongside councillors to identify roles and responsibilities to address the level and nature of response that may be required.

## Conclusions

- 6.43 Notwithstanding recommendations around the content of officer presentations and the live streaming, the planning committee process is well organised with the necessary processes, procedures and safeguards in place. The work of the PAS review team finds no reason to question the quality of officer advice received by committee members and the process is supported well by the legal advisor and democratic services staff.
- 6.44 Whilst the council is not currently at risk of designation for the quality of decisions made, officers and councillors need to work together to ensure that decisions are only made contrary to officer advice when there is evidence to justify an alternative balancing of material considerations.
- 6.45 The business of the planning committee is currently too concentrated on scrutinising and challenging the intricate details of planning proposals – potentially at the expense of the broader strategic considerations, which are a more appropriate focus of councillors and committee decision-making.
- 6.46 There needs to be more engagement between councillors and officers beyond that at the planning committee. At present this can result in opinions becoming entrenched rather than being explained and resolved through discussion. Officers and councillors have the opportunity via the recommendations in this report to actively improve engagement and enhance relationships.
- 6.47 This will have a positive effect on overall councillor-officer relationships that are generally accepted to have been in decline.
- 6.48 Whilst this report makes several specific recommendations, the overriding message is that there is need for a fundamental reset in the way officers and councillors interact. Senior managers and council leaders have a key role to play in leading this reset, encouraging and cultivating closer and more collaborative working and boosting morale. The resolving of many of the issues can be supported by reemphasising, communicating and following existing procedures more consistently and proactively addressing inappropriate behaviour where it occurs.

## 7. Plan-Making

### **Scope and purpose**

- 7.1 The Planning Advisory Service (PAS) was commissioned to undertake a review of local plan related work and processes at Bromsgrove District Council. The review was undertaken in parallel with a review of the development management (DM) function of the council (see section 6 of this report).
- 7.2 The review was designed to examine the approach being taken to local plan production and to evaluate the interaction and relationships between officers and councillors throughout the plan-making process.
- 7.3 This report provides a summary of the findings and recommendations arising from the review.
- 7.4 The primary objectives were to:
- Assess the effectiveness of governance arrangements and member engagement in local plan preparation.
  - Evaluate the working relationships between officers, members, and external partners (particularly Worcestershire County Council).
  - Identify barriers to progress and risks to successful plan delivery.
  - Understand the challenges related to evidence base preparation and stakeholder cooperation; and
  - Provide practical recommendations to strengthen the plan-making process and improve the likelihood of successful plan adoption.

### **Planning Policy Context**

#### *Current Development Plan and progress on the emerging plan*

- 7.5 The current development plan for Bromsgrove comprises:
- Bromsgrove District Plan 2011-2030 (adopted January 2017)
  - Worcestershire Waste Core Strategy (adopted 2012)
- 7.6 The Bromsgrove District Plan is now significantly out of date. The plan was adopted in 2017 and is approaching the end of its plan period (2030). More significantly, the council is unable to demonstrate a five-year housing land supply. As of 1 April 2025, the council can demonstrate only 2.24 years of deliverable housing land supply for the period 1 April 2025 to 31 March 2030. This means that the "tilted balance"<sup>4</sup> under paragraph 11(d) of the [National Planning Policy Framework](#) (NPPF) applies to decision-making on planning applications, significantly increasing the risk of speculative development proposals being received and approved on appeal.

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<sup>4</sup> Planning Legislation requires planning decisions to be made in accordance with the Development Plan as a starting point, and balance this with all other material considerations. Paragraph 11 of the NPPF, under the 'presumption in favour of sustainable development', sets out circumstances where this balancing exercise should be weighted towards granting permission. This is the case where there are no relevant policies in the Development Plan, or the relevant policies are 'out of date' including where the council cannot demonstrate a five-year supply of deliverable housing sites. These circumstances become a material consideration, which 'tilts' the balancing exercise from a neutral balance to one where there must be compelling reasons for permission to be withheld.

7.7 Progress on the emerging 'new' local plan has been protracted. The council undertook an issues and options consultation in September 2018, followed by a review update and further consultation in September 2019. A call for sites process resulted in over 400 possible development sites being submitted from across the district. A draft preferred option plan was prepared approximately four years ago (under an earlier iteration of the national planning policy framework (NPPF) and a lower local housing need), but this was subsequently not progressed by the council.

## **Emerging local plan and the government's [new plan-making system](#)**

7.8 The council is now progressing the emerging Bromsgrove district plan under the 'new' plan-making system being introduced by the government. The council's local development scheme (LDS) published in February 2025 sets out a 30-month programme from the notice of the start of plan-making to adoption, with a target adoption date of May 2028.

7.9 The new plan-making system introduces a gateway process:

- **Gateway 1 (Advisory):** Early-stage advisory checkpoint.
- **Gateway 2 (Advisory):** Mid-stage advisory checkpoint; and
- **Gateway 3 (Stop/Go):** Final mandatory checkpoint before proceeding to examination.

7.10 The LDS indicates that the council intended to give the required notice of the start of plan-making in October 2025, commencing the 30-month timeframe. The programme includes:

- Draft plan consultation (8 weeks) – completed in summer 2025.
- Public consultation (6 weeks) – scheduled for 2026.
- Examination; and
- Finalisation and adoption – May 2028.

7.11 The council has not yet been able to give the 30-month notice as intended due to a delay in the introduction of the regulations that will govern the implementation of the new plan-making system, meaning that for all councils, not just Bromsgrove, the 30-month period has yet to commence.

7.12 The council published a draft development strategy for consultation in June 2025. This consultation ran for 16 weeks (double the planned 8 weeks) and generated approximately 8,000 responses. The plan is described as an "initial draft" requiring further work to firm up the development strategy. Notably, the draft strategy consultation document did not include draft policies, employment land allocations, and was not informed by a complete evidence base.

## *Understanding of the New System*

7.13 Engagement sessions undertaken as part of the PAS review highlighted a range of outstanding issues or questions in relation to the council's local plan position and how this would be addressed under the new local plan system. For example:

- The transitional arrangements for local plans to progress under the current 'legacy' local plan making system (which has a deadline of 31 December 2026 for submission).
- The ability/options to progress a local plan under the new plan making system currently and in the absence of regulations.
- The potential risks and implications of seeking to progress a plan under the 'new' plan making system; and
- How the new system will differ from the current (legacy) system.

- 7.14 This uncertainty creates additional risk, as the council is operating under a system of plan making that is not yet fully implemented or tested, with guidance still emerging from government.

## *Government Announcement on the New Plan-Making System (27 November 2025)*

- 7.15 On 27 November 2025, the government published a [written ministerial statement](#) providing further details on the new plan-making system which will be introduced through regulations under the Levelling Up and Regeneration Act (LURA) 2023. The new system introduces a 30-month statutory period from the date a local planning authority gives notice of the start of plan-making to submission for examination, with a further period of up to 12 months for examination and adoption. The process includes three gateway checkpoints: Gateway 1 (around 9 months) and Gateway 2 (around 18 months) are advisory stages where the Planning Inspectorate (PINS) provides feedback to help authorities stay on track, while Gateway 3 (at 30 months) is a mandatory assessment where planning inspectors will determine whether the plan is ready can proceed to examination. At Gateway 3, planning inspectors will assess whether the plan has been prepared in accordance with legal and procedural requirements, is supported by adequate and proportionate evidence, has properly considered reasonable alternatives, and is deliverable.
- 7.16 For Bromsgrove District Council, the delay in introducing the regulations governing the new system means there is currently uncertainty about when the 30-month statutory period will formally commence and consequently whether the May 2028 adoption target can realistically be achieved. Once the regulations are introduced and the council can give formal notice of its intention to start the plan making process, the 30-month period will start. The new plan making system places great emphasis on 'front loading' the process making it essential that the foundational work is substantially progressed before that point to maximise the chances of successfully navigating the Gateway process.

## Key Challenges

- 7.17 Bromsgrove District Council faces a particularly challenging set of circumstances:

- **Political context:** The Council operates under no overall control (NOC), with Conservatives as the largest group but without an overall majority. Political groups include Conservatives, Liberal Democrats, Labour, and two Independent groupings. Elections are held on an all-out basis every four years, with the next elections due in May 2027.
- **Housing requirements:** The introduction of the revised standard method for calculating housing need as part of the NPPF (December 2024) has resulted in a significant increase in local housing need from 383 dwellings per annum (dpa) to 715 dpa for Bromsgrove.
- **Green belt:** Bromsgrove has extensive green belt coverage (approximately 90% of the district). Release of green belt land for development has historically been highly controversial and politically contentious. The introduction of the "grey belt"<sup>5</sup> concept in the NPPF adds further complexity.
- **Infrastructure:** Infrastructure is a major source of public and political concern. The extent of the challenges, particularly regarding secondary school provision, highways capacity,

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<sup>5</sup> (NPPF December 2004 Annex 2: Glossary) Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

healthcare facilities, and surface water drainage are an important part of what the evidence base for the local plan seeks to establish.

- **Public opposition:** There has been organised public opposition to the local plan, including a march during the summer 2025 consultation period that required a specific risk assessment and event management processes to be put in place. There have also reportedly been serious threats made to individual councillors regarding the Local Plan.
- **Local government reorganisation (LGR):** Proposals for local government reorganisation nationally and in Worcestershire create uncertainty about the future structure of local government. The outcome of these proposals is expected prior to the summer recess in 2026 with new structures of unitary authorities formally replacing existing councils in April 2028. This raises questions about whether the Bromsgrove local plan can be adopted before any reorganisation takes effect and who will be responsible for implementing it.
- **New plan-making system uncertainty:** The council is one of the early adopters of the new plan-making system. This creates uncertainty as the detailed requirements, expectations for Gateway assessments, and examination processes are still being clarified through government guidance and early testing.

## Approach to the review

7.18 The review was conducted in two distinct phases over a three-week period in October and November 2025:

- Phase 1: Desk-based review (31 October – 17 November 2025)

A comprehensive review of documentation was undertaken to establish a baseline understanding of the council's position and the key issues affecting local plan progression.

- Phase 2: Engagement meetings (26-27 November 2025)

Two full days of structured engagement sessions were held with key stakeholders at Bromsgrove District Council offices. In total, over 12 hours of direct engagement was undertaken with approximately 30+ participants. The sessions were structured to enable each group to speak freely about their perspectives and concerns.

Please refer to **Appendix 1** for full details of the documents reviewed and the interviews

## Key Issues and Risks

7.19 This section sets out the key issues and risks identified through the review, together with recommended mitigation measures for the council to consider. The issues are presented thematically, though it should be recognised that many are interrelated and cumulative in their impact.

### 7.20 Approach to the draft development strategy consultation

#### 7.21 *Issues*

- The latest consultation approach to the draft development strategy (published in June 2025) was voted on and agreed at Full Council in June. However, a consistent and significant theme emerging from the PAS interviews is a dissatisfaction among some councillors with the decision to consult on a single spatial option rather than presenting a range of alternatives for public consideration. These concerns have been compounded



by using separate political group briefings, as well as the SPSG meetings in advance of the full council meeting to discuss the strategy.

- In line with the council's plan making responsibility, it is important to recognise that the decision to consult on a draft development strategy reflects officers' efforts to re-establish momentum and progress the emerging local plan following a prolonged period of delay (see 'Planning Policy Context' above). This delay has been influenced by a combination of factors, including protracted changes to national planning policy, shifts in local political control, and the inherent complexity of the plan itself. These circumstances help explain the approach taken and highlight the difficulties officers face in navigating the differing levels of understanding among councillors about the risks associated with further delay in progressing the local plan towards a preferred spatial strategy. While acknowledging the challenges faced, it remains notable that more than seven years after the first consultation took place on the emerging local plan, the council has not been able to collectively agree a preferred spatial approach. Taking all this context together, the full council agreement to consult on a single spatial option is understandable given the urgency to progress the plan, but the approach does not enjoy the support of a significant number of councillors.
- Some councillors have raised concerns about the site assessment and selection process, citing perceived issues around transparency, consistency, and the level of information available on future infrastructure provision. The process has been characterised by some councillors as being 'developer-led through the call for sites', rather than council-led. While this characterisation does not fully reflect the necessary role of the call for sites process (a statutory part of the plan making process) in informing site assessment, it does point to the absence of a clearly articulated and widely shared spatial vision to guide site selection and command broad member confidence.
- There is a need for improved shared understanding of the importance of reaching political consensus on a preferred spatial strategy for the emerging local plan, and the implications of continued delay for the council's ability to proactively manage and shape future development in the district. There is also evidence of a gap in understanding among some councillors regarding the statutory role of evidence and professional officer advice in informing plan preparation and site selection.
- For the local plan to progress effectively, councillors need to take ownership of the emerging document as the 'council's plan', rather than perceiving it primarily as an officer-led exercise. During the recent consultation, a significant number of councillors publicly distanced themselves from the draft development strategy, with some expressing reservations about its approach and status. There is a key role here for the strategic planning steering group (SPSG) to provide the confidence, clarity, and leadership required to move the plan forward.
- Officers rightly regard the publication of the draft development strategy for public consultation as an important and long-awaited milestone in the progression of the emerging local plan. The plan has been in preparation for a considerable period, reflecting both its complexity and the repeated challenges of maintaining momentum in a changing policy and political context. The decision to move forward to consultation at this stage was intended to provide focus and direction, and to help progress the plan following earlier periods of stalling. At this point, however, the supporting evidence base needed to fully underpin the identification of preferred housing sites is still being developed, and the absence of draft planning policies alongside the proposed site options has made it difficult for some stakeholders to appreciate how development will be mitigated. In addition, the draft strategy approved for consultation does not currently identify land for economic uses, which may give the impression that the emerging plan is more strongly focused on housing than intended.

- Taken together, these issues extend beyond a purely technical disagreement about the consultation approach. They reflect a combination of long-standing challenges associated with the length of time taken to reach this stage, differences in perspective and confidence between councillors and officers, and varying views across political groups. While the approach taken was shaped by a desire to make progress, the consultation highlights the importance of clear governance, shared understanding, and strengthened working relationships as the local plan progresses.

## 7.22 Risks

- That the consultation approach requires councillors to be comfortable considering the overall needs of the district relative to their ward priorities and the very local needs of the public in their area.
- The spatial strategy lacks political consensus.
- The plan may not achieve the votes needed for approval at full council and at key Gateway stages, and if the plan progresses to examination without political support, there is high risk of it being withdrawn or found unsound.
- Work on the remaining evidence base (particularly the green belt assessment, infrastructure delivery plan, viability assessment and the transport assessment) may yet indicate that the draft development strategy needs to be updated.

## 7.23 Mitigation - before proceeding to the next stage of plan preparation the council should:

- Reflect upon the challenges arising from the latest consultation approach and identify lessons learned to consider when planning the next stages of the local plan and future consultation.
- Review the effectiveness of governance arrangements relating to the progression of the local plan to ensure that arrangements, processes and communications are robust.
- Facilitate a cross-party workshop for councillors (potentially with external facilitation) to explicitly address the concerns about process and to rebuild political consensus on taking the local plan forward.
- Consider whether additional consultation on alternative spatial strategies is necessary to restore confidence and bolster the status of the plan.
- Facilitate a cross-party workshop (potentially with external facilitation) to develop understanding and appreciation of risk relating to the local plan, including the implications of the 'tilted balance'.
- Establish training for all councillors on the role and importance of the local plan to reduce future risk and enable more effective and collaborative approaches to plan progression in the future.
- Empower councillors to communicate a strong positive vision for the future of the district arising from the emerging local plan to their electorate.
- Ensure that councillors consider the macro district-wide benefits of the emerging local plan rather than just the micro impacts for their wards.



- Ensure that any future consultation approach has explicit agreement from political group leaders before proceeding to full council.
- Urgently complete an up-to-date green belt assessment and ensure that key inputs relating to future infrastructure planning are secured from Worcestershire County Council without delay.
- Establish an agreed spatial vision and objectives to guide the development of a preferred spatial strategic approach that is evidentially grounded and robust.
- Produce an infrastructure delivery plan (IDP) to inform and justify the preferred approach being taken to the emerging local plan.
- Consider whether an independent peer review of the site selection methodology and its application would provide additional confidence.
- Commission spatial master planning work and utilise design coding to show what development could look like.
- Move beyond allocation boundaries to illustrate placemaking, design quality, and integration with existing communities.
- Show how infrastructure provision and community facilities would be delivered.
- Organise site visits to exemplar developments elsewhere so members can see what good growth looks like.
- Ensure that employment, retail, community facilities, green infrastructure, and design quality receive equal prominence to housing in plan presentation.

## **7.24 Service resilience and wellbeing**

### **7.25 Issues**

- Planning policy officers are working in an extraordinarily challenging and unsustainable environment. With more political ownership of the local plan required, and no political consensus on the direction it should take, it is difficult to make meaningful progress. This, together with finding themselves caught in the middle of the different political groups, has a highly negative effect on officer's morale.
- Officers and councillors experienced a high level of public reaction during the draft development strategy consultation. In some instances, the strength of feeling was intensified by wider commentary that did not always support constructive or collaborative discussion about how the plan could move forward. Officers report significant pressures arising from working on two local plans (Bromsgrove and Redditch) simultaneously. This is compounded by a high level of turnover within the team and ongoing planning reform at a national level. Officers acknowledge receiving good support from other departments and corporate communications, but the overall environment is described as not sustainable.
- Councillors face considerable pressures and challenges in seeking to progress the emerging local plan. Public feelings are running high, with high levels of objections to development. The district has several major infrastructure challenges that need to be properly quantified and evidenced through the plan making process, including local congestion, ongoing roadworks, health capacity and school constraints which make it very difficult indeed to sell the positive benefits of development to the electorate. Added to this is the fact that almost 90% of the district is subject to green belt designation,

which means that until the publication of the updated NPPF in December 2024 the district has been largely shielded from speculative development proposals. The 2024 NPPF has changed the way the green belt is considered in plan making and decision making<sup>6</sup> through the introduction of 'grey belt'<sup>7</sup>.

- Councillors require sufficient training and strong leadership to support them to fulfil their roles appropriately for the long-term benefit of the electorate and the district as a whole. In short, councillors need to be supported to make politically very difficult decisions.
- Allied to strong political leadership is the need for senior officers to continue to support the professional advice and work provided by planning policy officers. Without this the scale and scope of risks associated with delays in local plan progression will be difficult to address.

## 7.26 Risks

- Further staff departures and difficulty recruiting to vacant posts due to the challenging environment.
- Officer ill-health and burnout.
- Reduced quality of work due to pressure and low morale.
- Inability to meet Gateway milestones due to inadequate resources.
- Officers do not feel supported making difficult professional recommendations, and councillors in making difficult political decisions.

## 7.27 Mitigation - Senior leadership continue to actively support the planning policy team:

- Continue to position the local plan as a key corporate risk. Assistant Director and Strategic Plans Manager to provide regular briefings to senior leadership team (SLT) with chief executive, executive director invited where their support is required. This should extend into the new system planning process e.g. when 'gateway' decision points are reached.
- Re-state the council's protocols for acceptable councillor-officer interaction, backed by guidance from the monitoring officer.
- Ensure political group leaders take responsibility for councillors' conduct, and are reminded of the professional role, expertise and dedication of the planning policy team.
- Ensure adequate resources are in place through:
  - Ensuring that the 'assurance form' process is followed by all assistant directors.
  - Active efforts to recruit to vacant posts.
  - Consideration of agency or interim support if permanent recruitment is difficult.
- Providing additional project management capacity to coordinate parallel workstreams and Gateway preparations.

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<sup>6</sup> Paragraph 155 of the NPPF 2024 stipulates that development in the Green Belt may not be regarded as inappropriate where it utilises grey belt land and other relevant conditions are met.

<sup>7</sup> 'Grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 would provide a strong reason for refusing or restricting development.

- Dedicated communications support for local plan matters (not just general corporate comms)
- Ensure that officers get continued:
  - access to appropriate human resources (HR) support
  - regular supervision and support through line management
  - opportunities for team building and peer support
  - clear and effective escalation routes for issues
- Senior officers should attend consultation events and member meetings to support the work of more junior, less experienced officers.
- Consider whether additional recognition or reward mechanisms are appropriate.

## 7.28 **Improved governance arrangements**

### 7.29 *Issues*

- The current governance structure for the preparation of the local plan is fairly new and needs to be bed in so that it can robustly support the progression of the local plan, especially in a no overall control political environment.
- The strategic planning steering group (SPSG) needs to be reviewed (see recommendation RLP2) to promote a more cooperative approach among political groups to resolve difference, build consensus and reach agreement.
- Attendance at the SPSG is variable due to its open membership, resulting in no core group of consistently engaged, well-informed councillors. It also needs a more formalised role - the group currently functions primarily as an information-sharing forum.
- Engagement has been fragmented in the lead up to the consultation on the draft local plan. Each political group has had briefings from officers and group leaders meet separately with the chief executive, monitoring officer, and directors. Establishing joint sessions would promote genuine cross-party dialogue and reduce information silos.
- A formal coalition or confidence and supply agreement would help to provide stability, and members to exercise independence in voting on proposals.
- Under the new plan-making system, key decisions will need to be regularly made in a timely and predictable fashion if the plan is to progress successfully through Gateway checkpoints and meet the 30-month timetable.

### 7.30 *Risks*

- The council cannot build the cross-party consensus necessary to progress the plan in a timely fashion.
- Councillors make decisions without full information or understanding of alternatives.
- Political positioning and electoral considerations dominate over evidence-led planning.
- There is a lack of political buy-in to or ownership of the emerging plan.
- Delays continue as different groups pursue different objectives and agendas.
- Officers are caught in the middle, unable to progress work effectively.

- The district is left without an up-to-date local plan, and the tilted balance continues to apply for a prolonged period to the detriment of place making and delivering the priorities of local communities.

## *Mitigation*

- The Council should ensure that the governance arrangements are fully embedded and support a genuine cross-party local plan member working group with:
  - Defined membership proportionate to group sizes (not open attendance).
  - Requirement for continuity of attendance (named councillors with named deputies).
  - Clear terms of reference including collective responsibility for recommendations
  - Authority to make recommendations to cabinet/full council.
  - Regular meetings with effective and efficient administrative arrangements which minimise demands on planning policy officers.
  - Independent chairing by the council leader or assistant director rather than portfolio holder to emphasise the corporate priority.
- Ensure all councillors receive the same information at the same time in joint sessions, ending separate group briefings.
- Build in sufficient time for the working group to properly understand evidence and options.
- Require a commitment from group leaders that decisions made collectively by the working group will be supported by their wider groups (subject to normal democratic accountability).
- Consider whether a formal coalition agreement or confidence and supply arrangement between groups could provide greater stability for local plan progression.
- Ensure that members on the working group have sufficient understanding of the 'new' plan making process and are sufficiently representative of their groups.
- Ensure that all members receive appropriate information and briefings regarding the emerging local plan to enable them to keep abreast of progress prior to key decisions being taken by full council.
- Consider establishing an officer working group to be chaired by a senior officer to include representatives from teams across the council and county council to secure engagement and buy-in to local plan production and implementation.

## **7.31 Infrastructure Delivery Uncertainty**

### **7.32 *Issues***

- The single most significant barrier to councillor and public confidence in the local plan is the lack of certainty about infrastructure delivery, particularly transport and education.
- There is concern that existing capacity is already at breaking point and that development in neighbouring authorities will place cumulative additional pressure. There is considerable concern that additional school places required to support future growth will not materialise.
- Delays in the provision of strategic transport modelling from the county council have severely impacted upon plan progress. In addition, the approach of the county council to proactively and collaboratively input into the production of the local plan has been questioned.

- Existing approaches to engagement with the county council, including attempts at escalating concerns, appear to be wholly ineffective.

## 7.33 Risks

- Councillors need assurances over the delivery of infrastructure if they are to confidently support the local plan.
- The plan could fail at Gateway 3 or be found unsound at examination if the position on infrastructure means failing to demonstrate the deliverability of the plan.
- Infrastructure providers do not engage positively in plan progression which delays progress and compromises outcomes.
- Even if adopted, the plan cannot be implemented effectively without infrastructure.
- Public opposition continues to mobilise around infrastructure concerns.
- Developers may challenge deliverability of sites due to infrastructure constraints.

## 7.34 Mitigation - *The council must secure infrastructure delivery commitments as a matter of urgent priority:*

- Continued chief executive-to-chief executive engagement with Worcestershire County Council with clear expectations, deliverables, and accountability for county council support, ensuring Worcestershire County Council responds formally and substantively to local plan consultations.
- Establish regular councillor-level engagement (not just officers) between district and county cabinet members on local plan matters.
- Establish a formal memorandum of understanding (MoU) or service level agreement (SLA) for transport planning support, including:
  - Agreed timescales for transport model delivery
  - Specification for transport assessment reporting
  - Clear escalation procedures if deadlines are not met
- Ensure direct engagement between district council officers and the transport model team (Jacobs) with district input into model scenarios.
- Consider commissioning independent peer review of county council transport work.
- Develop fallback option to commission the council's own transport assessment work if county council cannot deliver to required timescales.
- For education obtain formal confirmation from county council of:
  - Current capacity issues in each catchment area.
  - Proposed solutions (expansion, new provision, catchment changes).
  - Trigger points for new provision linked to development phasing.
  - Funding commitments and mechanisms.
- Consider and explore how developer contributions may be front-loaded to enable infrastructure provision ahead of or alongside development.
- Consider how other sources of funding may help to secure future infrastructure delivery, including central government funding streams.

- Produce a robust Infrastructure delivery plan that is explicitly owned and endorsed by all relevant providers (not just produced by the district council).
- Consider adoption of community infrastructure levy (CIL) to provide more predictable and front-loaded infrastructure funding.
- Establish clear governance for ongoing infrastructure delivery and monitoring, with provider engagement continuing through to plan implementation.
- Ensure infrastructure requirements are a key consideration in site selection, with sites unable to be served by necessary infrastructure excluded or phased appropriately.

## **7.35 Programme management and timeline risks**

### **7.36 Issues**

- While the new plan-making system provides a 30-month programme from notice to adoption, there remain significant concerns about the council's ability to meet the LDS timetable targeting May 2028 adoption.
- The current LDS programme is optimistic given:
  - The extent of remaining evidence base work.
  - The lack of political consensus.
  - The challenging relationship with county council on critical evidence.
  - Challenges relating to the approach to the draft development strategy consultation.
  - The resource constraints within the planning policy team.
  - Uncertainty about the detailed requirements / regulations associated with the new plan making system (until published by government).
  - Timescales for local government reorganisation (LGR).
- The Council needs a detailed project plan which provides clarity on:
  - Key tasks required between now and Gateway 3.
  - Critical path dependencies.
  - Resource allocation and capacity.
  - Contingency for slippage or unexpected issues.
  - How the 8,000 plus consultation responses received will be processed and analysed.
  - Decision points and member engagement requirements.
  - Engagement with statutory consultees and infrastructure providers.

### **7.37 Risks**

- The May 2028 adoption target, already ambitious, cannot realistically be met.
- Insufficient time is allowed for evidence production, policy development, member engagement, and consultation processing.
- The plan fails at Gateway 3 because required work has not been completed.
- Delays in achieving political consensus continue, causing slippage against the LDS timetable.
- Inadequate contingency means any problem causes significant delay.
- The need for urgency continues to be under-appreciated and difficult decisions continue to be delayed/deferred.



- While an adopted Local Plan would continue to have statutory weight following local government reorganisation, current timescales suggest reorganisation may occur before adoption, creating uncertainty over whether a new authority would support and adopt the plan.

7.38 *Mitigation* - The Council must establish realistic and achievable programme management which builds upon existing work already undertaken to develop the emerging local plan, including the recently completed draft development strategy consultation findings. This should include:

- A comprehensive project plan working forward from the current position to May 2028, showing:
  - All tasks required for each phase of work.
  - When evidence must be complete for Gateway assessments.
  - Site selection and spatial strategy finalisation programme.
  - Policy development and testing schedule.
  - Sustainability appraisal iterations.
  - Member working group meetings and decision points.
  - Consultation periods and processing time.
  - Gateway preparation and assessment periods.
  - Contingency for each phase.
- A capacity assessment of planning policy team against project plan requirements, enabling the council to identify where additional resources (permanent, agency, or consultant) are required.
- Consider whether dedicated project management support is needed.
- Work backwards from each Gateway to understand:
  - What must be complete before each Gateway.
  - What evidence must be available.
  - What member decisions must be made.
  - What consultation/engagement must have occurred.
  - How long Gateway assessment may take.
- Implement monthly Red/Amber/Green progress reporting showing:
  - Progress against LDS milestones and project plan.
  - Risks to programme.
  - Decisions required from members.
  - Resource issues.
  - Consequences of any slippage
- Maintain and actively use a local plan specific risk register to:
  - Have mitigation plans ready for high-priority risks.
  - Be prepared to escalate issues to senior leadership and members quickly.
- Consider whether an interim planning policy statement (PPS) could be adopted to:
  - Articulate and demonstrate the council's commitment to the emerging spatial strategy.
  - Provide some limited weight to emerging policies in decision-making.
  - Help manage speculative development before plan adoption by proactively prioritising the delivery of development proposals that accord with the council's agreed spatial strategy.

- If detailed programme planning reveals that May 2028 cannot realistically be met, the LDS should be revised and republished with a more realistic timetable

## Conclusions

7.39 Bromsgrove District Council is at a critical juncture in its plan-making process. Whilst a considerable amount of work has been undertaken towards the development of a draft local plan, the production process has been significantly affected by:

- The lack of councillor / political support for the consultation approach.
- Exceptionally challenging environment for planning policy officers.
- Lack of compelling strategic spatial vision.
- Lack of cross-party consensus.
- Limited recognition of the scale of risks arising from a prolonged period without an up-to-date local plan and the application of the 'tilted balance'.
- Notwithstanding attempts to engage at chief executive level, challenging and ineffective relationships with Worcestershire County Council on critical infrastructure matters.
- Governance arrangements for a no overall control political environment still bedding in.
- Evidence base gaps and unclear critical path interdependencies, including the timescales for completion of key evidence and workstreams which are interdependent, such as the green belt assessment, site selection, transport assessment, infrastructure delivery plan and viability assessment.
- Variable member understanding of plan making and the new plan-making system.
- Lack of detailed programme management aligned to Gateway requirements.

7.40 However, the situation is not irrecoverable. The planning policy team is experienced and professional. The evidence base can be completed. Infrastructure delivery planning can be progressed. Political consensus can be built. The Gateway process can be successfully navigated. Achieving this will require:

- Acknowledgment that the process to date has not achieved its objectives.
- Willingness to continue to establish the new governance processes that will help reset governance and rebuild cross-party consensus.
- Continued and active senior leadership intervention and support.
- Realistic programme management with clear alignment to Gateway requirements.
- Investment in member development, particularly regarding the new system.
- Improved risk management and corporate acknowledgement of the need to mitigate risks associated with the emerging local plan.
- Improved partnership working, particularly with county council.
- Development of a compelling spatial vision for Bromsgrove's future.
- Sustained political leadership to make difficult but necessary choices.

7.41 Based on the assessment undertaken, and the amount of ground to make up and reset required on collaboration and engagement, there are very serious concerns about the likelihood that the council will successfully navigate the Gateway process and adopt a sound and legally compliant local plan by May 2028 as set out in the LDS.

7.42 However, progressing the emerging local plan is vitally important if the council is to provide for a plan-led approach to future development and infrastructure provision. Without an up-to-date local plan, the district will remain subject to the risk of widespread speculative development and 'planning by appeal' for a prolonged period which would be undesirable and detrimental to local communities. There is also a risk of government intervention in plan-making which would see decisions on the future direction of growth being taken away from the council.



- 7.43 A considerable amount of work has already been undertaken which can be built upon, including the outputs from the recent draft development strategy consultation. The council should seek continue to progress the emerging local plan as a corporate priority as swiftly as possible.

## 8. Implementation, next steps and further support

- 8.1 The council and service will want to consider and reflect on these findings. To support openness and transparency, we recommend that this report is shared internally. There is also an expectation that the council responds to the findings in the report and develops an action plan to be published alongside the report.
- 8.2 Where possible, PAS and the LGA will support councils with the implementation of the recommendations. PAS provides other advice, resources, and practical tools which may help Bromsgrove address challenges, build on strengths, and prepare for upcoming changes in the planning landscape. Notably, PAS maintains a suite of training materials for planning committees, including guidance on protocols, schemes of delegation, and committee operations and will continue to update these to align with new legislation, including the Planning and Infrastructure Bill.
- 8.3 While official performance figures for Bromsgrove are healthy, the council should consider the PAS [Development Management Challenge Toolkit](#) and using PAS guidance on managing DM performance effectively, and the [PAS planning committee best practice self-assessment toolkit](#).
- 8.4 Finally, given how much change to the planning system is envisaged over the next 12 months, we strongly encourage all authorities to [sign up to the PAS bulletin](#) where updates and new guidance is promoted.
- 8.5 It is recommended that the council discuss ongoing PAS support with Martin Hutchings, [martin.hutchings@local.gov.uk](mailto:martin.hutchings@local.gov.uk) and any corporate support with Helen Murray, LGA Principal Adviser, [helen.murray@local.gov.uk](mailto:helen.murray@local.gov.uk)



Association  
Local Government Association  
18 Smith Square  
Westminster  
London  
SW1P 3HZ  
Contact us by:  
Email: [info@local.gov.uk](mailto:info@local.gov.uk)  
Telephone: 020 7664 3000

## Appendix 1 – Approach to the Review

### **Approach – Decision Making Review**

The review was conducted in two distinct phases over a three-week period in October and November 2025:

#### **Phase 1: Desk-based review (31 October – 12 November 2025)**

A review of documentation was undertaken to establish a baseline understanding of the council's processes and the key issues affecting decision making.

Documents reviewed included:

- Planning review questionnaire responses from members and officers
- Team structure and staffing information
- Position statement
- Enforcement data
- Planning performance reports
- Planning committee member protocols and extracts from the constitution
- Customer satisfaction data

The desk-based review identified a series of questions and issues for exploration during the engagement phase.

#### **Phase 2: Engagement meetings (13-14 November 2025)**

Two full days of structured engagement sessions were held with key stakeholders at Bromsgrove District Council offices. In total, over 17 hours of direct engagement was undertaken with over 50 participants. The sessions were structured to enable each group to speak freely about their perspectives and concerns.

Day 1 (13 November 2025):

- Assistant Director and DM Managers
- Chief Executive and Executive Director
- Assistant Director – Democratic, Legal and Procurement Services (Monitoring officer) and Legal Services Manager (Deputy Monitoring Officer)
- Chair-Planning Committee
- Conservative Group
- Labour Group
- Independents 2025 Group
- Liberal Democrats Group

Day 2 (14 November 2025):

- Development Management team – planning officers of various roles
- Planning Committee (including substitutes)
- Planning Portfolio Holder
- Democratic and Legal Services Officers
- Worcestershire Regulatory Services Enforcement Team
- Local Planning Agents

The planning committee's legal advisor was interviewed subsequently via Zoom, and the Leader of the council was interviewed on 24<sup>th</sup> November 2025.

The stream recordings of the planning committee meetings held on 4<sup>th</sup> October 2025, 1<sup>st</sup> November 2025 and 6<sup>th</sup> December 2025 have been observed.

This review represents a snapshot in time based on the perspectives shared during the engagement period in late 2025. The review did not include direct engagement with:

- Parish and town councils
- Worcestershire County Council officers or members
- Infrastructure providers (education, highways, utilities, health)
- Members of the public or community groups

However, the perspectives of these stakeholders were reflected in the views expressed by members and officers during the engagement sessions.

The process did not involve detailed scrutiny of individual planning applications.

## **Approach – Plan Making Review**

The review was conducted in two distinct phases over a three-week period in October and November 2025:

### *Phase 1: Desk-based review (31 October – 17 November 2025)*

A comprehensive review of documentation was undertaken to establish a baseline understanding of the council's position and the key issues affecting local plan progression. Documents reviewed included:

- Self-assessment questionnaire completed by officers
- Planning review questionnaire responses from members and officers
- Local development scheme (LDS) (February 2025)
- Draft Bromsgrove district local plan: Draft development strategy consultation document (June 2025)
- Housing land supply position statement (April 2025)
- Team structure and staffing information
- Local plan risk register
- Project initiation document (PID)
- Work programme
- Recent relevant reports to the strategic planning steering group
- Recent relevant reports and minutes of the overview and scrutiny board
- Reports to extraordinary meeting of the council 19<sup>th</sup> June 2025

The desk-based review identified a series of questions and issues for exploration during the engagement phase.

### *Phase 2: Engagement meetings (26-27 November 2025)*

Two full days of structured engagement sessions were held with key stakeholders at Bromsgrove District Council offices. In total, over 12 hours of direct engagement was undertaken with approximately 30+ participants. The sessions were structured to enable each group to speak freely about their perspectives and concerns.

### *Day 1 (26 November 2025):*

- Conservative group members – including the Leader of the council, Deputy Leader, Portfolio Holder for Planning, and other members
- Assistant Director and Strategic Plans Manager
- Portfolio Holder for Planning
- Chief Executive and Executive Director
- Liberal Democrat Group members

## Day 2 (27 November 2025):

- Local Plan team – planning policy officers at various levels
- Labour Group members
- Bromsgrove Independents Group members
- Independents 2025 Group members

## *Limitations*

This review represents a snapshot in time based on a desk-based review of relevant documentation and the perspectives shared during the engagement period in late November 2025. Some scheduled participants were unable to attend certain sessions. The review did not include direct engagement with:

- Parish and town councils
- Worcestershire County Council officers or members
- Infrastructure providers (education, highways, utilities, health)
- Developers and landowners
- Members of the public or community groups

However, the perspectives of these stakeholders were reflected in the views expressed by members and officers during the engagement sessions. It is also important to note that this advice note is advisory only rather than providing a legal view, and it should be read in the context of relevant legislation, national planning policy, and guidance.

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### Overview and Scrutiny 2026

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#### Local Government Reorganisation – Update Report

Relevant Portfolio Holder	Councillor Sue Baxter
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Hannah Corredor, Assistant Director Corporate Services and Transformation
Report Author	Job Title: as above. Contact email: Hannah.corredor@bromsgroveandredditch.gov.uk
Wards Affected	All
Ward Councillor(s) consulted	N/a
Relevant Council Priority	Local Government Reorganisation
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

#### 1. **RECOMMENDATIONS**

**The Overview and Scrutiny Board is asked to RESOLVE that:-**

- 1) the progress to date in submitting an application to the Ministry of Housing, Communities and Local Government (MHCLG) for a two-unitary model titled, 'Transforming Worcestershire', be noted
- 2) the governance that has been established for Local Government Reorganisation in Worcestershire and the next steps outlined in this paper be noted.

#### 2. **BACKGROUND**

2.1 The timetable for Local Government Reorganisation (LGR) is set out in the table below.

Stage one: Inviting unitary proposals	Received November 2024
Stage two: Submission of formal unitary proposals.	Completed November 2025
➤ Stage three: Statutory consultation (MHCLG)	Expected to launch in February 2026
Stage four: Decision to implement a proposal	Expected before summer recess, July 2026
Stage five: Making secondary legislation – the Structural Changes Order (SCO).	Begins later in 2026 and ends with shadow elections in May 2027.
Stage six: Transition period	From decision to vesting day April 2028.

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Stage seven: New unitary authority goes live	April 2028.
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2.2 Transforming Worcestershire, a collaboration between Malvern Hills, Wychavon, Worcester City, Bromsgrove and Redditch Councils, successfully submitted their joint proposal to MHCLG ahead of the Government's deadline in November 2025. The Government are now preparing a consultation on the two proposals received from Worcestershire authorities: a one Worcestershire single unitary or a North / South two unitary option. This consultation is focused on reaching public bodies but is open to all residents and businesses. Further information will be provided when received from the Government.

2.2 The Councils have been actively communicating and engaging internally and externally with staff and residents. The Council's LGR Routes project aims to make staff feel informed, engaged and supported through LGR. Quarterly evaluation of staff engagement with this project has shown improving results, with staff particularly enjoying the all-staff briefing sessions and Q&A by the Chief Executive.

2.3 Externally, the Council's Transforming Worcestershire partnership with Wychavon, Malvern Hills, Worcester City and Redditch Councils has continued. The Council is preparing to launch a refreshed website that collates all the information regarding the proposal in a single site so that anyone participating in the consultation can access key documentation. The website can be viewed once launched at: [www.transformingworcestershire.co.uk](http://www.transformingworcestershire.co.uk) [not yet live].

### **3. OPERATIONAL ISSUES**

3.1 Following a successful system wide workshop on the 7<sup>th</sup> of January 2026 with Chief Executives, Monitoring Officers, Transformation leads and Section 151 Finance Officers from every authority in Worcestershire, the Councils have established interim governance for preparatory pre-decision activity and decision from January 2026 until receipt of a decision from MHCLG before the summer recess in July 2026. A monthly LGR Programme Board has been established with Chief Executives from the seven authorities as core members. This board will report to members via the cross-county Leaders Board as necessary.

3.2 Reporting into the Board and orchestrating and coordinating four key workstreams is a Programme Management Office (PMO). The programme management office is designed to enable collaboration



### Overview and Scrutiny

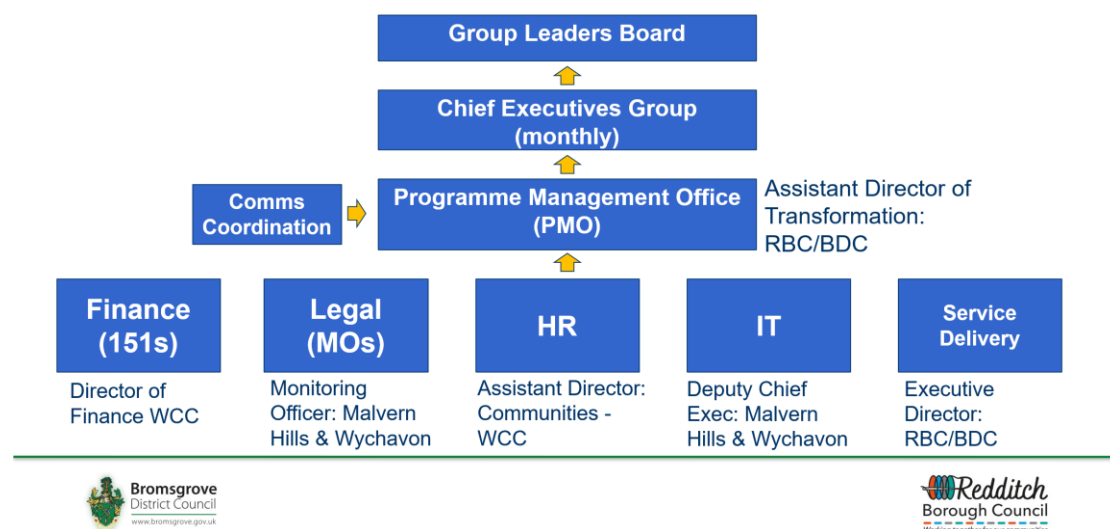
10<sup>th</sup> of February

2026

across priorities, set a clear rhythm and pace for activities, and provide the board with assurance reports on progress and strategic items for discussion/decision. The PMO will also work closely with a dedicated communications group, also with representatives from across the county. This group will also focus on ensuring both internal and external partners and stakeholders are engaged and informed about progress.

- 3.3 It was agreed that initial activities would focus on housekeeping in Finance, Legal, HR and IT. Primarily, these activities focus on cleansing data, aligning information and developing a baseline for key issues that will be essential to future implementation, regardless of the decision made. A Senior Responsible Officer (SRO) for each of the four workstreams was agreed as outlined in the diagram below. Each workstream is required to report back at each meeting of the board for the six months until a decision is taken. The next update is expected at the next LGR Programme board on 5<sup>th</sup> of March 2026.

#### System-level: Five key workstreams for Preparations Phase



- 3.4 Note that senior officers from Redditch and Bromsgrove are SROs for two key areas. Hannah Corredor, Assistant Director for Corporate Services and Transformation will lead the Programme Management Officer. Guy Revans, Executive Director will lead the workstream on Service Delivery. This group will begin to gather information about what services are offered to residents across the District and how the Council's models of service delivery vary. Further into the future, Bromsgrove and Redditch Councils will lead on the development of options appraisals.

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- 3.5 At Bromsgrove and Redditch Councils, a fortnightly LGR Preparations Board has been established to oversee and direct internal work. This board is chaired by the Chief Executive. Service Managers and Assistant Directors from all key areas are represented, including communications.

#### **4. FINANCIAL IMPLICATIONS**

- 4.1 It is expected that there will be significant upfront, unfunded costs incurred as a result of LGR. At present, the Government has made no funds available for the preparation or implementation of phases LGR. The exact cost of managing this transition in a way that manages key risks and ensures the quality of the Council's everyday services to residents go unaffected has not yet been calculated – but costs will be material and will continue to increase as the Council approaches Vesting Day in April 2028. Officers have earmarked provisional reserves for 2026/27 and 2027/28, however the investment required and mid- and long-term benefits of investing adequately have not yet been validated. These costs will include shared costs incurred in partnership with authorities across the county, as well as internal costs for the proper resourcing of implementation and continued high-quality service delivery.

#### **5. LEGAL IMPLICATIONS**

- 5.1 Significant legal implications will continue to arise as LGR progresses. The Overview and Scrutiny Board will be updated as and when necessary.

#### **6. OTHER - IMPLICATIONS**

##### **Local Government Reorganisation**

- 6.1 LGR is the subject of this report.

##### **Relevant Council Priority**

- 6.2 The information provided in this report supports the council's organisational priority of sustainability.

##### **Climate Change Implications**

- 6.3 No specific climate change implications have been identified.

##### **Equalities and Diversity Implications**

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- 6.4 Significant equalities implications will arise from the redesign and redistribution of services across the County. Reports will be presented for Members' consideration once planning progresses to a stage where these can be considered.

### **7. RISK MANAGEMENT**

- 7.1 Devolution and LGR are listed as a Corporate Risk in the Corporate Risk Register, owned by the Chief Executive Officer and led by the Assistant Director of Corporate Services and Transformation. The inherent risk level is 20 but the residual risk reduces to 12 with mitigations including much of the activity described here including new appointments, governance described above, development of detailed action plans and adequate planning.
- 7.2 A quarterly report on risk is scheduled for the Audit, Standards and Governance Committee's consideration on the 17<sup>th</sup> of February 2026.

### **8. APPENDICES and BACKGROUND PAPERS**

N/a

### Overview and Scrutiny 2026

10<sup>th</sup> of February

#### 9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Baxter	28/01
Lead Director / Assistant Director	Hannah Corredor	27/01
Financial Services	Julie Lorraine	26/01
Legal Services	Nicola Cummings	28/01/26
Policy Team (if equalities implications apply)	Hannah Corredor	26/01
Climate Change Team (if climate change implications apply)	N/a	

## BROMSGROVE DISTRICT COUNCIL

### OVERVIEW AND SCRUTINY BOARD WORK PROGRAMME

2025-2026

#### ITEMS FOR FUTURE MEETINGS

Date of Meeting	Subject	Lead Officer / Member
24 <sup>th</sup> March 2026	<b><u>Substantive Items</u></b>	
	Crime and Disorder Scrutiny – Annual Review of the Work of the Community Safety Partnership in the District	Bev Houghton, Community Safety Manager
	Renters Rights Act 2025 (Pre-scrutiny)	Matthew Bough, Strategic Housing Services Manager
	Permission to Revoke the First Homes Policy (Pre-Scrutiny)	Amanda Delahunty, Strategic Housing Officer
	<b><u>Information Items</u></b>	
	Levelling Up Fund Programme (Quarterly Update)	Rachel Egan, Assistant Director Regeneration and Property Services
14 <sup>th</sup> April 2026	Local Government Reorganisation (LGR) Update	Hannah Corredor, Assistant Director Corporate Services and Transformation
	<b><u>Substantive Items</u></b>	
	Update on Heatwaves Preparedness (Yearly Update) (Impact of Heatwaves Task Group Recommendation).	Guy Revans, Executive Director
	Local Heritage Action List (Quarterly Update)	Mike Dunphy, Strategic Planning and Conservation Manager
	Local Government Reorganisation (LGR) Update	Hannah Corredor, Assistant Director Corporate Services and Transformation
	Overview and Scrutiny Annual Report 2025-26	Chairman of the Board

## **ALL MEMBER BRIEFINGS**

<b>Date of Meeting</b>	<b>Subject</b>	<b>Lead Officer / Member</b>
15 <sup>th</sup> April 2026	Anti-Social Behaviour (Tools and Powers)	Bev Houghton, Community Safety Manager

## **FUTURE ITEMS FOR SCRUTINY**

<b>Date of Meeting</b>	<b>Subject</b>	<b>Lead Officer / Member</b>
	Capacity of the Minor Works Team (Requested 2/7/25 by Cllr McDonald) (TBA)	Rachel Egan, Assistant Director Regeneration and Property Services

## BDC Overview and Scrutiny Board - Action Sheet (2025/26)

**18 November 2025**

Subject	Action Required	Action Taken	Officer(s) Responsible	Other Comments	Status
<b>Strategic Overview of BDHT Services</b>	To provide Members with a contact protocol for complaints and enquiries (Cllr Ammar suggested a reference number system)	21/11/25 Emailed BDHT  16/12/25 Chased a response	BDHT		<b>Ongoing</b> 26/1/26 - This has been circulated to Officers and being reviewed for circulation to Members.
	To provide Housing Officer contact details for each ward area	6/1/26 – Chased a response			<b>Ongoing</b> 26/1/26 – This will be circulated to Members
	To review the maintenance of pathways and garages as a priority	26/1/26 – Chased a response			<b>Ongoing</b> 26/1/26 – BDHT are working on budgets at the moment, and consideration is being given to paths and garage sites.
	To provide Members with an Asset Register of footpaths				<b>Ongoing</b> 26/1/26 - If members need clarity on footpaths, they can contact via the protocol above which will be provided to Members.

**6<sup>th</sup> January 2026**

Subject	Action Required	Action Taken	Officer(s) Responsible	Other Comments	Status
<b>Biodiversity Duty Report</b>	To include and consider more measured information for future reporting in: capital investment, target of up to 100,00 trees over 15 years, development of BNG policies in emerging Local Plan	7/1/26 emailed action to officer	Matt Eccles		<b>Ongoing</b>
	To respond to Councillor McDonald re Green Flag Award status at St Chads	7/1/26 emailed action to officer	Ishrat Karimi Fini		<b>Completed</b>

Subject	Action Required	Action Taken	Officer(s) Responsible	Other Comments	Status
		26/1/26 Chased a response			Officers are meeting with Cllr Gray to discuss and explain future plans for this year on 29 <sup>th</sup> January 2026
<b>Particulate Monitoring</b>	To provide Councillor McDonald with the link for Annual Status Report (Gunner Lane, Rubery)	7/1/26 emailed action to officer	Chris Poole		<b>Completed</b> 7/1/26 Email sent to Cllr McDonald
<b>Cabinet Work Programme</b>	Planning Advisory Service (PAS) findings report to be added to Cabinet Work Programme	7/1/26 emailed action to officer	Guy Revans		<b>Completed</b> Going to Cabinet on 25 <sup>th</sup> March. O & S to review report before this time.
<b>Overview and Scrutiny Work Programme</b>	Capacity of Minor Works Team - A meeting to be set up to discuss further with Leader and Councillor McDonald	7/1/26 emailed action to officer  26/1/26 – Chased a response	Guy Revans		<b>Ongoing</b> Meeting for Leader, Chair O & S Board, Guy Revans and Rachel Egan being set up to discuss this further.
	Local Government Reform (LGR) - Regular updates should go to the Board for each meeting	7/1/26 emailed action to officer	Hannah Corredor		<b>Completed</b> 12/1/26 Officers agreed to set up monthly update. Update has been requested for Feb meeting.
<b>Action Sheet</b>	To include a briefing paper update on EV Charger Profit Sharing arrangements for the next February meeting	7/1/26 emailed action to officer	Simon Parry		<b>Ongoing</b> Briefing will be provided at the February Board meeting.



### Overview and Scrutiny Board

February 2026

#### UPDATE - BROMSGROVE CAR PARKING

Relevant Portfolio Holder	Councillor Karen May
Portfolio Holder Consulted	Yes
Relevant Head of Service	Rachel Egan – Assistant Director Regeneration & Property
Report Author	Rebecca McElliott Job Title: Regeneration Programme Manager email: Rebecca.Mcelllott@bromsgroveandredditch.gov.uk
Wards Affected	All
Ward Councillor(s) consulted	No
Relevant Council Priorities	Development Infrastructure
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	
This report contains exempt information as defined in Paragraph(s) 3 of Part I of Schedule 12A to the Local Government Act 1972, as amended – Appendix 2	

#### 1. RECOMMENDATIONS

The Overview and Scrutiny Board is asked to **RESOLVE** that:

- 1) The update on car parking in Bromsgrove be noted.
- 2) The Board consider and provide feedback on the issues raised in the report as follows:
  - i. Future use of Churchfields Car Park, Stourbridge Road Car Park and School Drive Car Park
  - ii. Options to restrict all day free parking at Sanders Park
  - iii. Car parks that can be used by season ticket holders
  - iv. Introduction of ANPR in Bromsgrove Town Centre
  - v. Parking enforcement outside Bromsgrove Town Centre

### Overview and Scrutiny Board

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#### 2. BACKGROUND

- 2.1 Parking plays a key strategic role within the Bromsgrove Town Centre Strategic Framework (2025), which identifies transport and access as central to achieving a vibrant, accessible, and future-ready town centre. The framework explicitly highlights the requirement to consider the needs of residents, businesses, and visitors in relation to transport and access, and to reflect on the findings of the strategic car parking review in shaping future land uses and investment priorities. This positions parking not simply as an operational service but as a core enabler of regeneration—supporting footfall, improving connectivity, and ensuring that development and the public realm function effectively as the town evolves. The use of town centre car parks in Bromsgrove is considered within this wider strategic context and with regard to the Bromsgrove 2040 Vision which identified three of the town’s car parks for redevelopment.
- 2.2 In 2023, Bromsgrove District Council commissioned the Bromsgrove 2040 Vision to deliver major social, economic and environmental benefits and strengthen Bromsgrove Town Centre’s viability, vibrancy and attractiveness. Cabinet members endorsed the 2040 Vision report detailing five potential strategic regeneration opportunities in the town –
- 1) Land at Windsor Street (former fire station and library) for residential use.
  - 2) Land at Former Market Hall for commercial and cultural use (Nailers Yard).
  - 3) Stourbridge Road car park for commercial development.
  - 4) Land at School Drive between the church and leisure centre for residential use.
  - 5) Churchfields car park for residential use.
- 2.3 In 2024, the Council instructed Waterman Infrastructure & Environment Ltd to undertake a Strategic Review of car parking to review existing requirements including supply and demand to meet current and future needs. The consultants reviewed all car parks on a site-by-site basis, providing options to address existing parking issues. They linked recommendations to align with regeneration objectives, to increase

### Overview and Scrutiny Board

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town centre living and footfall, and to support retention of existing traders. The review along with recommendations was presented to Cabinet in February 2025.

2.4 The purpose of this report is to provide an update on the implementation of some of the recommendations in the car parking report presented to Cabinet in February 2025 within the wider strategic context outlined above. This paper addresses the following recommendations:

- a) The Assistant Director for Regeneration and Property Services considers the future use of Churchfields Multi Storey, School Drive and Stourbridge Road car parks within the development of the new Town Centre Strategy.
- b) The Assistant Director of Regeneration and Property Services following consultation with the Cabinet Member for Economic Development and Regeneration, subject to any scrutiny of the proposals, develops a detailed business case and implementation plan including all technical surveys and full costs to install, where practicable and affordable, Automatic Number Plate Recognition (ANPR) systems to Recreation Road South, St Johns and Windsor Street car parks and to also investigate other car parks under the ownership of the Council.

Other matters that will be addressed in the paper are:

- a) Sanders Park car park usage and charges
- b) Season ticket holder car parks
- c) On street enforcement outside of the town centre

2.5 The conclusions from the strategic car park review relating to potential future demand for car parking in the town centre were as follows –

- a) There is sufficient capacity across the car parks until 2039 without the need to bring Churchfields car park back into use.
- b) Stourbridge Road car park has the lowest utilisation on average, and it is extremely unlikely that the disposal of the site will have a

### Overview and Scrutiny Board

February 2026

negative impact on parking capacity at other sites. Although there will be a transfer of current users to other car parks across the town centre, this is expected to be minimal.

- c) Although Parkside and New Road car parks are expected to be at a high utilisation level in 2039, demand could be managed across the car parks which have spare capacity, by using tools such as wayfinding or Variable Message Signs.

2.6 There are 1,013 car parking spaces in use within council owned car parks in Bromsgrove town centre (excluding Churchfields Car Park). Based on the Strategic Car Park Review data, the maximum peak occupancy in the town centre shows a current requirement for approximately 550 spaces. With an expected increase of 70 vehicles per day for Nailers Yard development, a total of **620** spaces are required. Based on the total number of spaces currently available, there is a surplus of approximately 390 spaces to accommodate future demand.

2.7 Whilst there is deemed to be sufficient capacity in the town centre car parks, users are predominantly parking in five of the eight car parks with St Johns and Windsor Street being the most utilised.

### **3. Current and Future Demand in Town Centre Car Parks**

3.1 Detail of the town centre car parks and their capacity can be found below. Users of the car parks are entitled to park for up to thirty minutes in all town centre car parks (other than Parkside Offices) for free as long as they obtain a ticket from the parking machine and display it correctly in their vehicle. Disabled blue badge holders can park free of charge in all long stay car parks and for up to three hours in short stay car parks. There are 1,013 spaces currently available across all of the car parks.

Car Park	Max Stay	Spaces (disabled)	Charges	Details	Height restriction
Recreation Road South	All day	292 (20)	1 – 5 hours £1-£5  Up to 6 hours £8.00  Up to 10 hours £11.00	Pay by cash, card or MiPermit	2.1m

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<b>North Bromsgrove</b>	All day	185 (10) plus 10 motorcycle spaces	1-3 hours £1-£3 Up to 10 hours £6	Season Tickets may be used Pay by cash, card, or MiPermit	2.1m
<b>School Drive</b>	All Day	128 (10)	1-3 hours £1-£3 Up to 10 hours £6	Season Tickets may be used Pay by cash, card, or MiPermit	2.1m
<b>New Road</b>	All day	58 (4)	1-3 hours £1-£3 Up to 10 hours £6	Season Tickets may be used Pay by cash, card, or MiPermit	No height restriction
<b>Parkside</b>	All day	94 (6) Motorcycles free in marked area	1-3 hours - £1-£3 Up to 10 hours £6	Season Tickets may be used Pay by cash, card, or MiPermit	2.1m
<b>Stourbridge Road</b>	All day	71 (5)	1-3 hours - £1-£3 Up to 10 hours £6	Season Tickets may be used Pay by cash, card, or MiPermit	2.1m
<b>St John Street</b>	3 hours	82 (4)	Up to 1 hour £1.30 Up to 2 hours £2.50 Up to 3 hours £3.80	Disabled drivers displaying valid blue badge – no charge up to a maximum period of 3 hours. Pay by cash, card, or MiPermit	2.4m
<b>Windsor Street</b>	3 hours	65 (6)	Up to 1 hour £1.30 Up to 2 hours £2.50 Up to 3 hours £3.80	Disabled drivers displaying valid blue badge – no charge up to a maximum period of 3 hours. Pay by cash, card, or MiPermit	2.1m
<b>Parkside Offices</b>	N/A	38 (5)	N/A	Permit holders only	No height restrictions

- 3.2 As part of the study undertaken by Waterman, 8 car parks were reviewed in Bromsgrove town centre during 2024. Data was provided for the period 22/04/24 – 28/04/24. This was considered to be a typical week within a neutral month with no school holidays or public holidays to impact the findings. The data was considered to give an accurate representation of typical occupancy levels.

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Car park	Weekday Average Occupancy			Saturday Average Occupancy			Sunday Average Occupancy		
	Morning	Afternoon	Evening	Morning	Afternoon	Evening	Morning	Afternoon	Evening
New Road car park	35%	35%	13%	56%	68%	18%	29%	46%	9%
North Bromsgrove car park	7%	10%	7%	21%	19%	2%	13%	13%	1%
Parkside car park	42%	68%	30%	47%	77%	18%	14%	32%	6%
Recreation Road South car park	30%	40%	32%	43%	61%	32%	20%	33%	N/A
School Drive car park	11%	25%	19%	12%	33%	25%	4%	8%	12%
St John Street car park	43%	83%	96%	64%	98%	88%	13%	37%	13%
Stourbridge Road car park	7%	5%	2%	1%	11%	7%	1%	2%	0%
Windsor Street car park	39%	73%	77%	73%	95%	53%	22%	10%	11%

3.3 As can be seen above, there are 3 car parks which have the highest occupancy rates of above 60% from Monday-Friday and during the weekend, with St John Street having a 96% average occupancy rate on a weekday evening and a 98% peak average occupancy rate on Saturday afternoon. Overall, across the chargeable times, the car park was at 60% utilisation. As well as St John Street car park, Windsor Street car park had a high utilisation rate of 77% on a weekday evening, 95% on a Saturday afternoon and 22% on a Sunday morning. Overall, across all the chargeable times, the average utilisation was 50% across all 3 days. The car parks with the lowest utilisation are all located to the northeast of the town centre.

3.4 Waterman used pay and display transaction records to derive average occupancy levels throughout the day. They also conducted observations (manual counts) at specific intervals – morning, afternoon and evening – to record available versus occupied spaces across each council operated car park. Average occupancy rates were then calculated. Due to pay and display transaction records being used to inform the review, and the inability to account for season ticket holder vehicles unless observed through manual counts, there may be limitations in the reliability of some of the data.

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- 3.5 Wychavon parking services have undertaken counts in the car parks since the parking review was undertaken. Based on weekday (lunch time) recent observations by the CEOs - New Road CP, Windsor Street CP, St Johns Street CP, and Parkside CP are all essentially at near capacity. Stourbridge Road CP appears to be nearing full capacity mid-week. School Drive CP appears to be approximately 60% full but closing the top half of North Bromsgrove CP will inevitably have had an impact on usage of School Drive CP.

#### **4. Future use of car parks and options to address capacity requirements**

- 4.1 Three car parks were identified in the Bromsgrove 2040 Vision document as being potential redevelopment sites – Churchfields, Stourbridge Road and School Drive. This section reviews the potential impact on overall capacity in the town centre and other potential issues.

#### **Churchfields Car Park**

Number of spaces	330
Current use	Closed (Civil Enforcement Officers and Shopmobility based here)
Income (three years)	Nil
Cost to retain (works plus ongoing maintenance)	£630,000 plus £75,000 per annum for maintenance
Potential use	Reopen as car park for permit holders and/or pay by app only (no cash machines), residential or commercial use

- 4.2 Churchfields Car Park was constructed and opened to the public in November 2003. The three-storey car park has six levels and spaces for 330 vehicles. In 2022, the car park was temporarily closed. The closure arose because of youth anti-social behaviour that represented a risk to life or serious harm to pedestrians because of items thrown from the upper levels, these have included filled litre bottles of water, trolleys and other heavy items capable of causing serious harm.

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- 4.3 Bringing Churchfields car park into operational use could be problematic. Both the police and community safety team have advised that they do not recommend the car park is reopened. However, they would consider supporting reopening if additional security measure were put in place such as fencing of upper floors, 3-metre-high curved fencing to the top floor and an upgraded CCTV system.
- 4.4 The security enhancement works would materially affect the external appearance of the existing building and on this basis, the development management team are of the view that planning permission would be required. The site is located adjacent to the designated St John's Conservation Area. The potential 3-metre-high curved fencing proposed to be located to the roof may also have the potential to detrimentally affect the setting of St John the Baptist Church (Grade I). However, the conservation officer has confirmed that a design is likely to be agreed through consultation.
- 4.5 A summary of the costs associated with bringing the car park back into operational use are detailed below. The total estimated cost is approximately £630,000. An annual maintenance budget of £75,000 should be allowed if re-opened and increased in line with inflation.
- 4.6 If Churchfields was redeveloped, the enforcement team could be relocated to Parkside Offices which could accommodate the service.
- 4.7 The Shopmobility service, historically located at Churchfields Multi-Storey Car Park, has experienced a significant decline in demand since COVID-19 and the closure of the car park. Originally supporting disabled customers when parking charges applied, the service is now used by only five customers—one of whom is a regular weekly user—compared with 12–15 users per week before the pandemic. Surveys undertaken in 2021 and 2025 show minimal engagement with the service, with most respondents preferring their own mobility equipment or support from friends and family. Attempts to relocate the service, including discussions with Asda and Age UK, were unsuccessful, though a limited one-scooter provision could be accommodated at the Parkside site.
- 4.8 If the multi-storey carpark remains closed, the recommended option is to formally close Shopmobility to new users while retaining a minimal service for existing customers at Parkside. An Equality Impact Assessment proposes direct consultation with affected users.



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- 4.9 If the car park was redeveloped, the cost of demolition and site remediation costs would impact any potential capital receipt. Thomas Lister have undertaken a development appraisal based on the following schemes (as per the Bromsgrove 2040 Vision) –
1. Option 1 - 18 3-bed Town Houses and 2 3-bed semi-detached properties
  2. Option 2 - 28 2 bed apartments and 9 3-bed townhouses
  3. Option 3 - 56 2-bed apartments
- 4.10 At this stage, the modelling of all options is based on high-level assumptions with one of the key unknowns at this stage being the demolition and site remediation costs. However, the appraisal suggests that Option 1 and Option 2 are financially viable. There would be limitations on what is built there as it is adjacent to a conservation area.

#### Stourbridge Road Car Park

Number of spaces	71
Current use	Predominantly season ticket holders and Council staff (Parkside)
Income (average last 3 years)	£15,000
Cost to retain (works plus ongoing maintenance)	£110,000 for resurfacing plus £10,000 per annum ongoing maintenance and NNDR
Potential use	Commercial use (development agreement in place) with agreed capital receipt

- 4.11 Bromsgrove District Council marketed the freehold of the 0.72-acre Stourbridge Road long-stay car park in April 2012. Interest was solicited from developers and expressions of interest were evaluated by a selection panel using criteria such as price, regeneration impact, planning alignment, deliverability, and tenant strength. In 2014, an agreement was reached with Cordwell Property Group that gave them a conditional freehold to develop retail-led mixed-use units on the car park. Any alternative or additional proposals—such as McDonald’s—continue under separate planning assessments. The most recent planning application from Cordwell Property Group has not yet been determined.

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- 4.12 The car park review suggested that removal of Stourbridge Road car park would not have a negative impact on parking capacity at other sites. However, observations suggest that the car park is busy during office hours on weekdays. This could be due to most car park users being season ticket holders as to why the data does not necessarily align with observed patterns.

#### School Drive Car Park

Number of spaces	128
Current use	Small number of season ticket holders and methodist church visitors
Income (average last three years)	£60,000
Cost to retain (works plus ongoing maintenance)	£140,000 for resurfacing plus £15,000 for ongoing annual maintenance
Potential use	Mixed, residential or commercial

- 4.13 School Drive car park, which encompasses the former Dolphin Centre and adjacent car park, is highlighted in the 2040 Vision as suitable for residential and/or mixed development to optimise underused land in the town centre. Analysis from the car park review suggested that the car park operates at low occupancy and is one of the most underutilised car parks in the town centre.

#### Review of potential development sites and impact on parking provision

- 4.14 Unsurprisingly, town centre car parks with the highest usage are located closest to the High Street and supermarkets. The car parks with the lowest levels of utilisation are in the Northeast area of the town (School Drive, North Bromsgrove and Stourbridge Road).
- 4.15 Due to there being a conditional freehold to develop retail-led mixed-use units on Stourbridge Road car park, it should be assumed that there will be a loss of 71 spaces in the future. On that basis, if Churchfields multi-storey is reopened, capacity will increase to 1,272 spaces. If School Drive is redeveloped, this would reduce to 1,144 spaces. If both School Drive and Churchfields are redeveloped, there

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would be a total of 814 spaces available in council-owned car parks available against a projected peak requirement of 620.

- 4.16 The costs of bringing Churchfields car park back into use and ongoing maintenance costs are significantly higher than retaining School Drive car park. However, School Drive car park would provide a higher capital receipt if disposed of and is in a less desirable location for town centre parking. It is unlikely that users of Nailers Yard would park at School Drive car park thus putting additional pressure on car parks with already high use.
- 4.17 If Churchfields was not reopened, Recreation Road South is no more than 50% occupied at any one time other than on Saturday afternoons (66%). Therefore, the Council could seek to amend the car park order to allow up to 100 season tickets to be sold for this car park. This would enable users of Nailers Yard to park and could relieve pressure on Parkside car park.
- 4.18 If School Drive was redeveloped, any users of the car park (as well as Stourbridge Road) could easily be accommodated in the adjacent North Bromsgrove car park.

### 5. Sanders Park Car Park

- 5.1 Although not strictly within the town centre, a review of the Sanders Park car park indicates that many people are parking vehicles all day for free and using the town centre. Introducing a maximum stay of 2-3 hours would encourage the turnover of spaces, allowing park users to continue to park for free but restricting the ability of town centre workers to park there all day at no cost. Drivers could obtain a ticket for the maximum stay from one of two pay and display machines that would need to be installed at a cost of £8,000 (the same as the current free 30 minutes in other car parks) with any vehicle that overstays receiving a ticket. Alternatively, the Council could agree to introduce charges for the car park, or charge for any stay after the 2/3-hour free period.
- 5.2 Another option would be to make Sanders Park car park a MiPermit only car park, i.e. no cash option (purchase virtual stays which would remove the need to purchase 2 x pay and display machines).

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#### 6. Season Tickets

- 6.1 There are currently 210 long stay season ticket holders in Bromsgrove. They are permitted to use the following car parks – New Road, Parkside, Stourbridge Road, School Drive and North Bromsgrove. Most users tend to park in Parkside car park and New Road car park as they are situated closest to the town centre.
- 6.2 There are 493 staff permits for BDC and 302 for RBC. The RBC permits can be used in Stourbridge Road and included with the BDC permits are County permits, Councillors and general staff parking. Whilst this is a high number, the number of staff that work in the office during the week is low. Most staff that visit Bromsgrove will park in Stourbridge Road car park. Whilst this car park can get busy, there is capacity at School Drive and/or North Bromsgrove car parks to accommodate 71 spaces.
- 6.3 The Council have received some complaints relating to the usage of Parkside car park from businesses. It was suggested that Council staff were using the car park thus reducing the spaces available for customers. However, a recent survey conducted by Wychavon enforcement team identified that most users were season ticket holders working in the town centre only a handful of which were Council staff. Potential options to address this include removing the car park from the list of season ticket holder options and encourage them to use either School Drive (reduced rate if not redeveloped) or use Churchfields car park (if reopened)

#### 7. Viability of Installing Automatic Number Plate Recognition (ANPR) Cameras at Recreation Road South, St Johns and Windsor Street car parks

- 7.1 At Cabinet on 12 February 2025, the report prepared by Waterman Infrastructure and Environment Ltd on the Bromsgrove Strategic Parking Review was considered, and the following recommendations were agreed in relation to the installation of ANPR:

*The Director of Resources includes in the Medium-Term Financial Plan for 2025/26 a capital budget of £100k for ANPR systems to Recreation Road South, St Johns and Windsor Street car parks*

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*A revenue budget of £15k per annum be included in the Medium-Term Financial Plan from April 2026 for the maintenance contracts for the ANPR installations*

*The Assistant Director of Regeneration and Property Services following consultation with the Cabinet Member for Economic Development and Regeneration, subject to any scrutiny of the proposals, develops a detailed business case and implementation plan including all technical surveys and full costs to install, where practicable and affordable, Automatic Number Plate Recognition (ANPR) systems to Recreation Road South, St Johns and Windsor Street car parks and to also investigate other car parks under the ownership of the Council.*

- 7.2 Following a review and in consultation with Wychavon parking services, officers have raised several concerns about introducing ANPR cameras in council owned car parks which are discussed below.
- 7.3 Local Authorities are not permitted to use ANPR for enforcing off-street parking contraventions. ANPR can be used to record vehicle registrations upon entry to the car park and will allow exit of the car park when the appropriate parking fee has been paid. If installed in local authority (LA) operated car parks, barriers on exit would be critical to physically prevent drivers from leaving the car park without payment. It is currently unlawful to issue Penalty Charge Notices for non-payment in a LA operated car park using evidence supplied from an ANPR system.
- 7.4 Enforcement officers would need to patrol the car parks to check that those using disabled bay parking have valid blue badges, that users are parking within the bays correctly and that cars parked in EV charging bays are electric vehicles charging. Therefore, there would still be a requirement for the car parks to be physically patrolled by a Civil Enforcement Officer. A contravention has to be observed by an authorised officer (CEO) who can then issue a PCN.
- 7.5 There are cost, maintenance, and potential privacy concerns to overcome, and to maximise the benefits and mitigate the risks, the Council would need to undertake careful planning, compliance with regulations, and robust cybersecurity measures.

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- 7.6 ANPR reduces the need for physical tickets. However, the installation and setup of ANPR systems is expensive, requiring significant upfront investment in hardware, software, and infrastructure. ANPR systems and barriers require regular maintenance and updates to ensure accuracy and functionality. Consideration needs to be given to the additional resource required to deal with barrier and system faults, answering the intercom and out of hours' issues and how the overall system would be manned and managed. The Council will need to include the manning and management of the ANPR system internally (especially the intercom) and although the CEOs are best placed to provide feedback, would not be responsible. Therefore, an internal BDC resource will need to be assigned to this.
- 7.7 The total cost of installing ANPR cameras at Recreation Road South, St John Street and Windsor Street would be approximately £132,000. The revenue costs would be approximately £14,400 per annum. This figure does not include any additional costs from Wychavon parking services.
- 7.8 Taking into consideration the points identified above, it is considered that the introduction of ANPR into any of the Council operated car parks would be problematic in terms of operational issues, data protection and anticipated costs and increased revenue costs.
- 7.9 Following further investigation, it is clear that the introduction of ANPR will not free up CEO capacity to increase patrol time outside of the town centre as anticipated and therefore the introduction of ANPR is unlikely to achieve the aim to do so as discussed at the Overview & Scrutiny Board in February 2025.

### **8. Out of town enforcement**

- 8.1 Councillors have expressed concerns about the time spent by enforcement officers on patrol out of the town centre. It was agreed by Cabinet that the Service Level Agreement (SLA) with Wychavon parking services would include a minimum of 25% of patrols outside of the town centre.
- 8.2 The latest data on town centre enforcement time versus out of town can be found at Appendix 2. In November 2025, 29% of all patrol time

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was spent out of the town centre and in December 2025, the figure was 26%.

- 8.3 The suggestion that introducing ANPR to some town centre car parks would free up more time to enforce outside of the town centre has been found not to be the case as mentioned in section 4 above.
- 8.4 If the Council wanted to increase the number of CEOs (currently 5.5 FTE posts), the cost is £50,000 per annum per CEO. This would enable more time to be spent on out-of-town centre enforcement.

### **9. Conclusion**

- 9.1 A strategic approach to parking requires us to look beyond the overall number of spaces and focus on how they are distributed, accessed, and used. While School Drive Car Park has spare capacity, its location on the periphery of the town centre makes it less convenient for shoppers and workers and more suitable for redevelopment. By contrast, Churchfields—despite the issues associated with it—sits in a much stronger position to serve town-centre users because of its proximity to key destinations. However, costs to bring back in to use are significant, there is no guarantee that enhanced security measures will prevent anti-social behaviour, and the police may recommend closure again. This could impact the insurance if the decision was taken to keep it opening following advice. The ongoing maintenance costs of a multi-storey are also significantly higher than a surface level car park.
- 9.2 Parkside is well located but is heavily occupied by season-ticket holders, limiting availability for short-stay visitors who drive economic activity. Recreation Road South is well located to accommodate users of the Nailers Yard development if season tickets are made available to purchase.
- 9.3 These factors highlight the need for a more strategic, place-based approach to how our car parks operate, supported by clear wayfinding to influence and guide usage patterns. This report seeks the views of the Overview and Scrutiny Board to inform future decisions about the potential redevelopment of car park sites and how our car parks can be used to support the towns economic growth. It is recommended that

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further in person counts are undertaken to provide up to date evidence of car park usage.

#### **10. FINANCIAL IMPLICATIONS**

- 10.1 The annual cost for parking enforcement undertaken by Wychavon Parking for 2025/6 is £335,160.
- 10.2 Parking fee charges generate approximately £1 million per year of revenue for the Council. The most profitable car parks are Windsor Street, St John Street and Recreation Road South – accounting for around two thirds of all income.
- 10.3 The potential loss of income from Stourbridge Road if the planning application for McDonalds is approved is approximately £16,500 per annum. The expected capital receipt for Stourbridge Road is noted in appendix 2.
- 10.4 The potential loss of income if School Drive car park is redeveloped is approximately £60,000 per annum. The capital receipt if the car park is redeveloped would depend on what the future use is. The site is larger than Churchfields car park and does not have any existing structures that would need to be demolished. Therefore, the capital receipt is likely to be higher than for Churchfields car park.
- 10.5 Prior to its closure, Churchfields car park generated an income of approximately £16,000 per annum (2022/2023). Most users were season ticket holders including Council staff. The estimated residual land value based on the Thomas Lister report if the car park is redeveloped for residential use can be found at appendix 2.
- 10.6 The cost of resurfacing and improvements to Stourbridge Rd car park are approximately £110k. The cost of resurfacing and improvements to School Drive car park are approximately £140k. There is an allocation in the capital programme for these works. Both car parks need to be resurfaced if they are to continue to be used as car parks.
- 10.7 The estimated capital costs for the installation of ANPR at the 3 Car Parks suggested is £132K with an anticipated annual revenue cost of £14,400 for maintenance.



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- 10.8 The annual costs for one additional CEO is approximately £50,000. For two years, the cost would be approximately £100,000.

#### **11. LEGAL IMPLICATIONS**

- 11.1 The legal framework for enforcement in England comprises Part 6 of the Traffic Management Act 2004.
- 11.2 In 2012, BDC applied for decriminalised parking in the District. This process included an application form submission to the Department for Transport (DfT) which was completed by WCC and BDC. WCC led on this application as it mainly focusses on On Street enforcement (public highway) although Off Street (car parks) were also included as the whole enforcement operation was decriminalised.
- 11.3 BDC operates a system of providing Off-Street parking for residents and visitors under the Road Traffic Regulation Act 1984. The legislation allows the Council to designate Off-Street car parks (Section 32) and regulate their operation, including the levying of charges through a Local Parking Order.

#### **12. OTHER - IMPLICATIONS**

##### **Local Government Reorganisation Implications**

- 12.1 Currently, Bromsgrove District Council manages off-street car parks, while Worcestershire County Council is responsible for on-street parking and wider traffic management. Post-reorganisation, these functions would be unified under a new unitary authority. A unitary authority will allow for a joined-up approach to parking provision, with the ability to integrate it with strategic planning, transport infrastructure and regeneration.

##### **Relevant Council Priorities**

- 12.2 This project supports the following Council Priorities:

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Infrastructure – By enabling car parking provision that is good quality, affordable and can accommodate demand it helps residents and visitors to access services within our local communities.

Town Centres – That Bromsgrove is easily accessible by all sectors of the community and that the town centre is a safe place for everyone to visit, live and work.

#### **13. Climate Change Implications**

- 13.1 By introducing MiPermit, the virtual permit system, has resulted in the reduced amount of paper required for parking tickets and permits, together with Residents' Parking Permits.

#### **14. Equalities and Diversity Implications**

- 14.1 In respect of the option to close the Shopmobility Service an Equality Impact Assessment has been undertaken. Officers would consult directly with the users who are potentially impacted and agree an alternative arrangement.

#### **15. RISK MANAGEMENT**

- 15.1 Disposal or redevelopment of any town centre car parks will reduce overall parking revenue. Consideration should be given to incentives for underutilised car parks to offset losses. The Council could also phase redevelopment to minimise disruption and maintain capacity during peak demand.
- 15.2 There is reputational risk associated with the potential introduction of charges at Sanders Park car park, closing Shopmobility and removing season ticket options for some town centre car parks. Any changes would require stakeholder consultation.

#### **16. APPENDICES and BACKGROUND PAPERS**

Appendix 1 – town centre enforcement vs out of town data  
Appendix 2 – Financial implications (exempt information)

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Bromsgrove Strategic Parking Review  
Cabinet – Strategic Parking Review, February 2025  
Bromsgrove 2040 Vision  
Bromsgrove Town Centre Strategic Framework

#### 17. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Cllr Karen May	22/1/2026
Lead Director / Head of Service	Rachel Egan AD Regeneration and Property	21/1/2026
Financial Services	Debra Goodall – Acting S151 Officer	22/1/2026
Legal Services	Nicola Cummings, Principal Solicitor – Governance	22/1/2026
Policy Team (if equalities implications apply)	Rebecca Green	22/1/2026
Climate Change Team	Matthew Eccles	22/1/2026

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Bromsgrove District Council - On-Street and Off-Street Information

Time on patrol does not include time logged as traveling

On-Street Location	Oct-25			Nov-25			Dec-25		
	No of Days Visited	Time On Patrol (Mins)	PCNs Issued	No of Days Visited	Time On Patrol (Mins)	PCNs Issued	No of Days Visited	Time On Patrol (Mins)	PCNs Issued
Bromsgrove (Town)	29	7132	58	30	7893	106	30	9509	138
Alvechurch	10	215	4	13	411	6	9	325	8
Aston Fields	19	811	0	13	667	4	15	696	7
Barnt Green	11	41	5	14	633	31	16	812	28
Belbroughton	10	274	1	12	323	1	10	295	0
Beoley	1	7	0	3	187	2	1	66	0
Catshill	5	57	0	5	116	0	4	78	2
Clent	7	129	0	6	125	0	6	112	0
Crofton Hacket	3	50	0	7	143	0	6	137	0
Fairfield	0	0	0	2	70	0	1	40	0
Frankley	0	0	0	0	0	0	0	0	0
Hagley	9	747	11	6	838	10	11	866	16
Hollywood	1	150	2	3	122	2	1	211	3
Lickey	3	145	0	6	390	0	4	208	1
Lydiate Ash	14	269	1	16	367	0	13	276	0
Romsley	11	616	3	11	644	1	13	789	6
Rubery	6	988	11	10	703	6	7	1234	23
Stoke Prior	0	0	0	0	0	0	0	0	0
West Hagley	4	40	0	3	39	1	2	57	0
Wythall	3	139	0	4	377	0	2	219	7
On- Street Totals		11810	96		14048	170		15930	239
Non-Town On-Street Totals		4678	38		6155	64		6421	101
Percentage of On-Street time and PCNs Non-Town On-Street		40%	40%		44%	38%		40%	42%
Off-Street Location		Time On Patrol (Mins)	PCNs Issued		Time On Patrol (Mins)	PCNs Issued		Time On Patrol (Mins)	PCNs Issued
Alvechurch	7	144	1	11	165	6	11	121	2
Bromsgrove	29	6293	252	30	7680	385	30	9215	341
Off-Street Totals		6437	253		7845	391		9336	343
Total Time on Patrol and PCNs Issued		18247	349		21893	561		25266	582
Number of CEOs	3.75 FTE			4.5FTE			5.5FTE		
Percentage of time On-Street and PCNs On-Street		65%	28%		64%	30%		63%	41%
Percentage of Time Off-Street and PCNs Off-Street		35%	72%		36%	70%		37%	59%
Percentage of all Patrol Time in Non-Town Areas		26%			29%			26%	
On-Street PCN Income Received During the Month	£4,760.92			£5,629.50			£7,627.28		
Off-Street PCN Income Received During the Month	£7,617.31			£8,816.04			£7,340.20		
Total PCN Income Received During the Month	£12,378.23			£14,445.54			£14,967.48		
Total Pay and Display Machine Coin Income (Metric Figure)	£16,115.10			£16,328.45			£15,629.85		
Total Pay and Display Machine Card Income (Metric Figure)	£47,918.90			£46,584.50			£49,452.90		
Total MiPermit Pay and Stay Income (Stay Value)(Begin Date)	£18,613.80			£18,404.60			£12,920.20		
Total MiPermit Season Ticket Income (Logged date)	£4,858.80			£4,690.96			£4,283.12		
Total Car Park Payment Income	£87,506.60			£86,008.51			£82,286.07		
Total MiPermit Resident Permit Income (Logged date)	£160.00			£80.00			£80.00		
Total Income	£100,044.83			£100,534.05			£97,333.55		

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