

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 Local plan policies are open to challenge for being out of date, housing need has recently doubled, and housing land supply is just 2.24 years.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>There is an urgent need for a reset in the relationships and interaction between councillors and officers. 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>Recommendation: Strengthen and formalise councillor planning training</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"> • Defensible decision-making training for planning committee members, 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. • An ongoing programme of training for planning committee members focused on emerging national and local planning issues, 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>¹', should be applied in decision-making.

¹ 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"> • A dedicated programme of planning training for ward councillors, 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.
RDM3	<p>To continue exploring ways of working more effectively with Worcestershire County Council (especially highways).</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>To undertake a review of the processes and performance monitoring associated with planning enforcement. 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>To undertake a review of officer presentations to the planning committee. 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>Review the quality of streaming of planning committee meetings and the timescale for retention of recordings. 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>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. 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>To undertake a review of the planning committee site visit process to encourage better attendance. 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>Build political consensus. 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>Review the operation and terms of reference for the strategic planning reference group (SPSG) 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"> • 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 and efficient administrative arrangements. • Authority to make recommendations to cabinet/full council. • Regular meetings with effective and efficient administrative arrangements. which minimise demands on planning policy officers. • Impartial chairing by the council leader or assistant director rather than portfolio holder to emphasise the corporate priority. • End/avoid separate political group briefings and ensure all members receive the same information simultaneously.
RLP3	<p>Develop the strategic spatial vision and complete evidence base. 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>Secure infrastructure delivery commitments as a priority. 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>Strengthen Programme Management and Resources. Develop a comprehensive project plan aligned to the new planning system 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	Continue active senior leadership support. 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	Introduce a training and support programme for councillors. 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"² 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

² 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"³ 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.

³ (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"⁴ 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.

⁴ 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"⁵ 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,

⁵ (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 making⁶ through the introduction of 'grey belt'⁷.

- 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.

⁶ 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.

⁷ '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 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 and any corporate support with Helen Murray, LGA Principal Adviser, helen.murray@local.gov.uk


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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 24th November 2025.

The stream recordings of the planning committee meetings held on 4th October 2025, 1st November 2025 and 6th 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 19th 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.