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**Planning Advisory Service (PAS) Report**

Relevant Portfolio Holder	Councillor Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Guy Revans, Executive Director – Environment and Communities
Report Author	Job Title: Executive Director – Environment and Communities Contact email: <a href="mailto:guy.revans@bromsgroveandredditch.gov.uk">guy.revans@bromsgroveandredditch.gov.uk</a>
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	All four Council Corporate Priorities.
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	
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**1. RECOMMENDATIONS**

The Cabinet RESOLVE that: -

- 1.1 The findings of the Planning Advisory Service (“PAS”) Report dated January 2026 attached at Appendix 1 be noted.
- 1.2 The comments of the Overview and Scrutiny Committee regarding consideration of the PAS Report as summarised in this report and set out at Appendix 3 be noted.
- 1.3 The recommendations made by the PAS as set out at 3.1.2 of this report be accepted and implemented.
- 1.4 The progress made to date as set out in section 3.3 of this report be noted and the Planning Advisory Service Recommendations Action Plan as set out at Appendix 2 of this report be adopted.

**2. BACKGROUND**

- 2.1 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,

commissioned an independent review of the council's planning service to ensure it is well placed to meet the challenges ahead.

2.2 The review was carried out by the Planning Advisory Service ("PAS") and the final report is attached at Appendix 1. In requesting the review, it was recognised that there are multiple challenges facing the delivery the Council's planning service currently, including the need to support councillors and officers in responding to legislative changes, historical issues with progressing plan-making and the requirement to deliver a new local plan. The PAS note that the planning service is operating in a complex environment with 89% of land in the District designated as green belt. Housing land supply is only 2.24 years belt which can lead to additional development pressures.

2.3 The PAS review covers BDC Local Plan production and the Development Management decision making framework. The objectives of the review were as follows: -

- 1) Assess the effectiveness of governance arrangements.
- 2) Evaluate the working relationships between officers, members, and external partners (particularly Worcestershire County Council).
- 3) Identify barriers to successful decision-making.
- 4) Provide practical recommendations to strengthen the decision-making process and improve the likelihood of successful outcomes.

### **3. OPERATIONAL ISSUES**

#### **3.1 Key points from the PAS report January 2026.**

3.1.1 The text below provides a summary of the key points from the PAS report against the above objectives.

##### **1) Assess the effectiveness of governance arrangements.**

- It was found that the Development Management processes are broadly very sound. But that early engagement between councillors and officers is not always consistent with regard to applications.
- There is a need to embed governance arrangements that can foster cross party consensus around the Local Plan. This means developing a compelling spatial vision, completing the evidence base and working with key partners, especially Worcestershire County Council.

**2) Evaluate the working relationships between officers, members, and external partners (particularly Worcestershire County Council).**

- There is work to do to rebuild levels of trust between councillors and officers. These dynamics relate to both the Local Plan processes and Develop Management and the Planning Committee processes.
- 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.
- Above all the PAS note that the Council must create an environment where behaviours reflect shared goals rather than individual or political agendas.
- The PAS note that Bromsgrove's planning service is at a critical juncture, and that the leadership and senior management must have a clear opportunity to address the current risks but also 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.

**3) Identify barriers to successful decision-making.**

- It is noted by the PAS that planning is increasingly being viewed through a party-political lens rather than a shared corporate priority.
- They also note that the Council being in no overall control has led to a greater need for cross party collaboration.
- Further, that there are significant obstacles to meeting the current Local Development Scheme (LDS) timetable, not least the absence of the national plan making regulations and Local Government Reorganisation (LGR).
- The report is clear that planning is a key corporate risk. The political leadership and senior managers will need to support and enable officers and councillors to make difficult but necessary decisions.
- 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.

- 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, and we 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.

**4) Provide practical recommendations to strengthen the decision-making process and improve the likelihood of successful outcomes.**

- The PAS team have made 15 recommendations, which can be seen on pages 7 and 8 of the report. 8 relate to Development Management and the decision-making process, and seven to the Local Plan review. These aim to build consensus, develop an agreed vision, improve training, improve resources, improved partner relations.

**3.2 Recommendations of the report**

3.2.1 The Key recommendations from the PAS review are set out in the table below. In accordance with recommendation 1.3, Members are being asked to resolve that the recommendations set out below are accepted and implemented.

<b>Decision making</b>	
RDM1	<b>There is an urgent need for a reset in the relationships and interaction between councillors and officers.</b> This is essential to improve collaborative working between officers and members that will improve the quality of decision-making. All the mechanisms and processes are in place to enable this but are not being used as widely and effectively as they could be. This should be led and given the highest priority by senior managers and political leaders with buy-in from all political groups as well as the planning team.
RDM2	<b>Recommendation: Strengthen and formalise councillor planning training</b> 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. This programme should include the following components:

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	<ul style="list-style-type: none"><li>• <b>Defensible decision-making training for planning committee members</b>, based on the PAS <i>Defensible Decision-Making</i> resource and, where appropriate, the use of relevant case studies. The purpose of this training is to ensure committee members are fully aware of their statutory role and responsibilities, to reinforce the principles of sound, evidence-based decision-making, and to reduce the risk of challenge. It is recommended that this element of the training is delivered by a suitably experienced external consultant to provide independence and specialist expertise.</li><li>• <b>An ongoing programme of training for planning committee members focused on emerging national and local planning issues</b>, developed alongside the council's existing annual training offer. This should include briefings on new and evolving forms of development (for example, grey belt development and battery storage) and reinforce understanding of how key policy concepts, including the application of the '<i>tilted balance</i>'<sup>1</sup>, should be applied in decision-making.</li><li>• <b>A dedicated programme of planning training for ward councillors</b>, aimed at improving understanding of how councillors can appropriately influence planning decision-making, the limits and parameters of that influence, and the wider council context within which planning decisions are taken. This training should cover the legal framework governing planning decisions, the importance of decisions being robustly evidenced, and ensure councillors are fully cognisant of the council's code of conduct and constitution as they apply to planning matters. The programme should also include an overview of the role of planning enforcement and how it interacts with planning decision-making.</li></ul>
RDM3	<p><b>To continue exploring ways of working more effectively with Worcestershire County Council (especially highways).</b></p> <p>The need to cultivate better joint working and engender a more effective role within the decision-making process is recognised by the council. The Bromsgrove chief executive is encouraged to continue to engage with their counterpart at Worcestershire County Council and establish clear expectations and deliverables. This may be achieved via and memorandum of understanding (MOU) regarding highway matters, developed by the planning service with the support of the executive director and chief executive.</p>
RDM4	<p><b>To undertake a review of the processes and performance monitoring associated with planning enforcement.</b> This should be undertaken with a specific emphasis on improving the interaction between the investigating officers and the planning officers responsible for undertaking planning assessments, as well as on how this work is prioritised. In terms of performance, a key objective of planning enforcement is to resolve as many breaches as possible without serving a notice, and that should be seen as a</p>

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	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.
RDM5	<b>To undertake a review of officer presentations to the planning committee.</b> This is to ensure that officer presentations are proportionate and provide a greater focus on identifying what are the key issues to assist committee member's consideration.
RDM6	<b>Review the quality of streaming of planning committee meetings and the timescale for retention of recordings.</b> This needs to be aimed at identifying ways of improving the viewing experience, taking note of best practice elsewhere. Previous legal advice around the retention of recordings should be revisited to ensure that the recordings are retained until they cease to perform any useful purpose.
RDM7	<b>To provide greater encouragement for councillors to contribute to pre-application work and to explore how interaction between councillors and officers outside of the planning committee more generally can be improved.</b> This should involve reviewing the operation of existing procedures to understand why they are not leading to greater interaction, and how further opportunities can be encouraged. This should be supplemented by reinforcement by senior officers and political party leaders of the importance and benefits arising from greater officer-councillor engagement in planning matters more generally.
RDM8	<b>To undertake a review of the planning committee site visit process to encourage better attendance.</b> This should explore and seek to resolve the issue of poor attendance, including reviewing the timing and number of accompanied site visits undertaken.
<b>Local Plan Review</b>	
RLP1	<b>Build political consensus.</b> Reflect upon the challenges arising from the draft development strategy consultation approach and identify lessons learned. Facilitate an impartially chaired cross-party workshop of all councillors/and or the strategic planning steering group (SPSG) to address concerns about process, rebuild consensus, and develop understanding of risks relating to the 'tilted balance' (see recommendation RDM2 above). This will empower elected members to communicate a strong positive vision for the district's future and consider 'macro' district-wide benefits rather than just 'micro' ward impacts.
RLP2	<b>Review the operation and terms of reference for the strategic planning reference group (SPSG)</b> to improve governance arrangements and support a genuine cross-party local plan member working group. A review should include: <ul style="list-style-type: none"><li>• Defined membership proportionate to group sizes (not open attendance).</li><li>• Requirement for continuity of attendance (named councillors with named deputies).</li><li>• Clear terms of reference including collective responsibility for recommendations and efficient administrative arrangements.</li></ul>

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	<ul style="list-style-type: none"><li>• Authority to make recommendations to cabinet/full council.</li><li>• Regular meetings with effective and efficient administrative arrangements. which minimise demands on planning policy officers.</li><li>• Impartial chairing by the council leader or assistant director rather than portfolio holder to emphasise the corporate priority.</li><li>• End/avoid separate political group briefings and ensure all members receive the same information simultaneously.</li></ul>
RLP3	<p><b>Develop the strategic spatial vision and complete evidence base.</b> Urgently complete an up-to-date green belt assessment and establish an agreed spatial vision and approach to guide development of a preferred spatial strategy. Commission spatial master planning work and utilise design coding to illustrate what development could look like, moving beyond allocation boundaries to show placemaking, design quality, and community integration. Ensure employment, retail, community facilities, and green infrastructure receive equal prominence to housing .in future iterations of the draft plan. Organise councillor site visits to exemplar developments.</p>
RLP4	<p><b>Secure infrastructure delivery commitments as a priority.</b> Build on chief executive-to-chief executive engagement with Worcestershire County Council with clear expectations and deliverables. Create a formal memorandum of understanding for transport planning support with agreed timescales and escalation procedures. Work closely with the county council to jointly identify solutions and agree future plans to fund and deliver new and enhanced education provision to serve planned growth. Produce a robust infrastructure delivery plan (IDP) endorsed by all providers. Consider adoption of community infrastructure levy (CIL) and explore front-loading of developer contributions.</p>
RLP5	<p><b>Strengthen Programme Management and Resources.</b> Develop a comprehensive project plan aligned to <a href="#">the new planning system</a> Gateway requirements, showing all tasks, critical path dependencies, resource allocation, and realistic contingency. Undertake capacity assessment of the planning policy team and secure additional resources (e.g. Assistant Directors have been proactively asked and reminded to submit budget bids, including bids for additional capacity) where needed. Implement regular progress monitoring and actively maintain risk register. If May 2028 target proves to be unachievable through detailed planning, revise and republish the local development scheme (LDS) with realistic timescales.</p>
RLP6	<p><b>Continue active senior leadership support.</b> Use the corporate risk register to reinforce and recommunicate that the local plan is a key corporate risk. There should be regular progress reporting to the senior leadership team from the assistant director and the strategic planning manager. Chief executive and executive director should keep a dialogue going with planning policy officers and attend key meetings where appropriate to provide their support where required. Reinforce clear protocols for engagement and councillor-officer interaction and ensure group leaders take responsibility for councillor's following them and continue to provide wellbeing support for planning officers.</p>

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RLP7	<b>Introduce a training and support programme for councillors.</b> Establish training for all councillors on the role and importance of the local plan to reduce future risk and enable more effective and collaborative approaches to plan progression in the future. Councillors require sufficient training and strong political group leadership to support them to fulfil their roles appropriately for the long-term benefit of the electorate and the district as a whole. In short, members need to be supported to make politically very difficult decisions.
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3.3 Actions taken to date:

3.3.1 There has been cross party consideration and discussion of the report at the Group Leaders meeting on 28<sup>th</sup> January and at the Overview and Scrutiny Committee meeting held on 10<sup>th</sup> February. There has also been consultation and discussion with the Chair and Vice Chair of the Planning Committee.

3.3.2 The Group Leaders meeting agreed a number of actions including: -

- That the PAS Report be considered by the Overview and Scrutiny Committee on 10<sup>th</sup> February 2026
- That to build political consensus, a Local Plan Cross-party Working Group (LPCPWG) should be established with a defined membership proportionate to group sizes with immediate effect (3 Conservative, 2 Liberal Democrat, 2 Labour and 2 Independent).
- That Terms of Reference (ToR) should be drawn up for the LPCPWG.
- That a meeting should be held with the chair and vice chair of the planning committee to discuss the LGA planning training for committee chairs held at Warwick University. The aim of the meeting was to review what additional steps to support the running of planning committee could be agreed and implemented or alternatively be referred to the constitution working group for further consideration

3.3.3 The meeting of Overview and Scrutiny on 10<sup>th</sup> February considered a report summarising the findings of the PAS report and Members had the opportunity to be addressed by and put questions to two of the planning consultants from PAS who had been involved in the review. A list of the main issues discussed is set out at Appendix 3 to this report.

- 3.3.4 In addition to the full list at Appendix 3, Members may wish to note the following specific points raised by the Overview and Scrutiny Committee:
- That the Committee believes that there is a need for joint Officer-Member relationship building training. This links to PAS recommendation RDM1 regarding the need for a re-set in the relationships and interactions between councillors and officers. Members of the Committee resolved that **“Joint Officer-Member relationship building training be included as a formal action within the PAS action plan”**.
  - That urgency in moving forward was highlighted as a concern with particular regard to the Local Plan and the number of speculative planning applications.
  - Members also discussed the need to progress implementation of the PAS action plan.
- 3.3.5 The meeting of the Chairman and Vice Chairman of Planning Committee outlined in paragraph 3.3.2 has now taken place. This has resulted in some suggestions regarding the operation of Planning Committee being agreed to be implemented as soon as practicable. A number of other matters that need more in-depth consideration have been referred to the Constitution Working Group.
- 3.3.6 Officers can report that to date there have been two meetings of the LPCPWG. An update on the local plan issues was given to the first meeting of the LPCPWG and a further update given at the second meeting to keep group members fully apprised of current position and timescales across the work streams.
- 3.3.7 Counsel’s Opinion was sought from a specialist planning barrister around the local planning process. The barrister attended the first meeting of the LPCPWG and will be attending relevant future meetings to give clarity on the Local Plan process.
- 3.3.8 Resourcing requirements have been worked up for both the Local Plan and Development Management. These have identified that additional staff are required in both areas and due to the increase in applications budgets will be increased to allow recruitment in the new financial year.
- 3.3.9 Initial meetings have been held to discuss the required training, workshops and support that is required for both Councillors and Officers for both the Local Plan and Development Management areas and this

has included joint training and workshops as requested at the meeting of the Overview and Scrutiny Board on 10<sup>th</sup> Feb 2026.

3.3.10 A draft Memorandum of Understanding has been produced for discussion with the County Council once agreed by the LPCPWG.

**4. FINANCIAL IMPLICATIONS**

4.1 The Development Management element of the review and report was paid for by the Planning Advisory Service and was therefore carried out at no cost to the Council. The Local plan element cost a total of £17,744

4.2 Recruitment to existing positions is ongoing, in order to progress plan making at speed funding for additional posts has been included in the budget. The Cost for these posts is £123k per annum, although 40% of this would be apportioned to RBC under the shared service arrangement, leaving £74k for BDC to fund.

4.3 In addition, £525k has been apportioned from reserves to fund the evidence base and legal fees associated with preparing the Local Plan.

4.4 Within DM recruitment is ongoing for 1 x (within establishment costs) Principal Planner role. However additional resource is also being requested to enable 2 further postholders to be appointed. Considering existing savings, the costs of these 2 x additional posts would be £113,919, split under the shared services arrangement 66% to BDC (£75,946) and 33% to RBC (£37,973).

4.5 These proposals will be funded via additional Planning income or if that does not happen then it will be funded from Financial resilience reserve fund.

**5. LEGAL IMPLICATIONS**

5.1 Planning decisions must be decided in accordance with the Formalising training and clarifying roles will strengthen compliance with the statutory framework for planning and enforcement decisions. It will also reinforce the legal framework governing councillor behaviour, including the Code of Conduct and rules on predetermination. Other actions will clarify expectations between parties and strengthen compliance with administrative law.

5.2 The plan-making process is governed by the Town and Country Planning (Local Planning) (England) Regulations 2012, although

changes are being made via the Levelling Up and Regeneration Act 2023 (LURA). Preparing a development plan is a statutory requirement for Local Planning Authorities

**6. OTHER - IMPLICATIONS**

**6.1 Local Government Reorganisation**

Failure to adopt a new Local Plan before local government reorganisation (April 2028) creates uncertainty over plan ownership, as the new Authority will have the final say on adoption, and implementation.

We wrote to Wyre Forest District Council re the potential for a North Worcestershire Local Plan and they have rejected this in favour of a single district plan for their area.

**6.2 Relevant Council Priority**

Economic Development, Housing, Environment and Infrastructure.

**6.3 Climate Change Implications**

6.3.1 Planning plays a central role in delivering the Council's Net Zero and climate resilience objectives. Both the Local Plan and day-to-day development management decisions shape future carbon emissions, transport patterns, energy use and the District's ability to adapt to climate impacts.

6.3.2 Implementing the PAS recommendations will help ensure climate considerations are embedded more consistently and defensibly in planning decisions by strengthening governance, evidence, and Member training.

6.3.3 To support sustainable growth and align with national policy requirements, future planning work should:

- **Promote low-carbon, energy-efficient development**, using design codes and updated policy to require higher energy standards and low-carbon heating.
- **Enable renewable and low-carbon energy infrastructure**, including solar, wind, and heat networks, where appropriate.
- **Prioritise sustainable transport**, integrating active travel, public transport and EV infrastructure to reduce car dependency.
- **Strengthen climate adaptation**, particularly regarding flood risk, surface water management, overheating and water efficiency.

- **Protect and enhance green and blue infrastructure**, supporting biodiversity, carbon sequestration and climate resilience.
- **Ensure development delivers Biodiversity Net Gain** and other statutory environmental outcomes.

6.3.4 The emerging Local Plan will be the primary mechanism through which these climate objectives are delivered. Early decisions on spatial strategy, infrastructure, and green belt considerations will have long-term implications for carbon reduction and environmental resilience. Embedding robust climate evidence and maintaining strong Member–Officer collaboration will be essential in achieving a sustainable and future-proofed development strategy for the District.

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

Adopting these recommendations supports equality and diversity by strengthening fairness, transparency and consistency in decision making. It also improves the accessibility of the planning process and help councillors better understand their duties under the Equality Act 2010. To implement them lawfully the council must ensure that all training and processes are accessible to every councillor and that no new procedures inadvertently disadvantage people with protected characteristics. It is also important that equality considerations are embedded in revised approaches, MOUs or enforcement frameworks.

### **7. RISK MANAGEMENT**

- 7.1 The Bromsgrove District Plan (adopted 2017) is nearing the end of its plan period and is no longer providing an effective planned framework for decision-making.
- 7.2 From a DM perspective, risk centres around the Speed and Quality of decision making and government sanctions are in place if either fall below relevant thresholds. Implementing an action plan to address the issues identified by the PAS report, would reduce risks especially around the quality assessment and would ensure that good decisions are being made. Departmental risk monitoring and mitigation would remain in place and is regularly discussed with the Service AD.
- 7.3 The progress of the Local plan is being monitored via the corporate risk register under COR0017. The immediate action is to update the timetable for the Local Plan and formally publish the notice of intention to start plan making, this is being considered by the Local Plan Working group. Once the regulations allowing the Council to formally progress into the new plan making system are published, the notice

can be prepared. In the background work is still progressing on the plan as identified in this report.

- 7.4 Lack of five-year housing land supply is an issue, with only 2.24 years' supply, the council is exposed to the *tilted balance*, increasing the likelihood of additional development pressure.
- 7.5 There is a risk of government intervention in plan-making if progress is not made.
- 7.6 Fragmented political control increases the risk of inconsistent decision-making and difficulty achieving cross-party consensus on strategic planning matters.
- 7.7 Tension between national policy and local priorities, Councillors face ongoing tension between green belt protections and government housing delivery expectations, increasing decision risk.
- 7.8 Delays and unresolved issues can lead to appeals for non-determination, removing control from the council.
- 7.9 Excessive focus on minor details at planning committee risks missing strategic planning considerations and weakens the planning balance.
- 7.10 Limited early engagement by councillor involvement at pre-application and pre-committee stages leads to unresolved concerns surfacing late in the process.
- 7.11 With approximately 89% of the district designated green belt, options for growth are severely constrained. This is added to by the complexity of "grey belt" policy:
- 7.12 The perceived ineffectiveness of enforcement, leads to Councillor frustration and limited understanding of enforcement constraints, competing workloads can delay enforcement investigations and undermine confidence in the system. An overreliance on notice numbers rather than resolution outcomes risks a misleading performance assessment.
- 7.13 Continued strain between officers and councillors risks further decline in working relationships and organisational culture and staff departures and recruitment difficulties, reduces capacity and institutional knowledge adding to pressures on staff.

**8. APPENDICES and BACKGROUND PAPERS**

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- 8.1 Appendix 1 - Planning Advisory Service Report
- 8.2 Appendix 2 - Planning Advisory Service Recommendations Action Plan
- 8.3 Appendix 3 - Summary of comments of the Overview and Scrutiny Committee regarding consideration of the PAS Report (meeting date 10<sup>th</sup> February 2026)

**9. REPORT SIGN OFF**

<b>Department</b>	<b>Name and Job Title</b>	<b>Date</b>
Portfolio Holder	Kit Taylor	03.03.2026
Lead Director / Assistant Director	N/A	N/A
Financial Services	Debra Goodall	03.03.2026
Legal Services	Sarah Sellers	26.02.2026
Policy Team (if equalities implications apply)	Rebecca Green	03.03.2026
Climate Change Team (if climate change implications apply)	Matthew Eccles	03.03.2026