BROMSGROVE DISTRICT COUNCIL

Cabinet 18th November 2026

Update on Actions taken to meet the Planning Advisory Service (PAS Recommendations)

Relevant Portfolio Holder	Councillor Sue Baxter
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Guy Revans, Executive Director – Environment and Communities
Report Author	Name: Guy Revans, Job Title: Executive Director – Environment and Communities Contact email: guy.revans@bromsgroveandredditch.gov.uk
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.	
This report contains exempt information as defined in Paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972, as amended.	

1. RECOMMENDATIONS

The Cabinet is asked to RESOLVE that

1) The contents of the updated Action Plan in response to the Planning Advisory Service's Recommendations are agreed.

2. BACKGROUND

2.1 In light of the significant reforms introduced through the Levelling-Up and Regeneration Act 2023, the Planning and Infrastructure Act 2025, and updates to the National Planning Policy Framework (NPPF), Bromsgrove District Council's 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 outcomes of that review were presented to the Cabinet on the 25th March 2026 where the following was resolved

- The findings of the Planning Advisory Service ("PAS") Report dated January 2026 be noted.
- The comments of the Overview and Scrutiny Board regarding consideration of the PAS Report be noted.

- The recommendations made by the PAS be accepted and implemented.
- The progress already made be noted and the Planning Advisory Service Recommendations Action Plan be adopted

3. OPERATIONAL ISSUES

3.1 As can be seen in Appendix 1, a progress update has been prepared showing progress against the PAS review recommendations covering both: Development Management (RDM1-RDM8) and Local Plan Review (RLP1-RLP7).

3.2 Overall, substantial progress has been made on governance including the introduction of the national scheme of delegations for planning functions, establishment of the Local Plan Cross-Party Working Group (LPCPWG), and improved collaboration with Worcestershire County Council (WCC). The remaining challenge is achieving political consensus on the future Local Plan strategy. Notwithstanding this, the role of the LPCPWG is supporting a collaborative approach to plan making in the District which is delivering agreed outcomes from each meeting enabling the Council to remain on track against the timeline for a new Local Plan covering the District. Below is a summary of progress against all recommendations.

3.3 **RDM1 - an urgent need for a reset in the relationships and interaction between councillors and officers.**

- Extensive engagement between officers and members, resulted in full Council approving the National Scheme of Delegations for Planning functions on 14 October 2026.
- Additional workshops and briefing material have been provided.

3.4 **RDM2 - Strengthen and formalise councillor planning training**

- Grey Belt Training (29 April 2026)
- NPPF Training (29 September 2026)
- National Scheme of Delegation for Planning Functions Training
- Planning Refresher Training
- PAS Training Session (8 September 2026) and two others to follow.

3.5 **RDM3 - To continue exploring ways of working more effectively with Worcestershire County Council (especially highways).**

- WCC has agreed to upload consultation responses directly through Public Access.
- Discussions are underway with Idox (website publishing platform) regarding implementation.

- A Memorandum of Understanding (MOU) has been agreed (see Appendix 3).

3.6 **RDM4 – to undertake a review of the processes and performance monitoring associated with planning enforcement**

- There is a dedicated planning resource now supporting enforcement.
- Improvements are being made to reporting systems and performance monitoring.
- The focus is moving towards priority-based case management rather than enforcement notice statistics.

3.7 **RDM5 -To undertake a review of officer presentations to the Planning Committee.**

- Presentations have already been shortened.
- Key discussion topics have been highlighted during the Committee debate.

3.8 **RDM6 - Review the quality of streaming of Planning Committee meetings and the timescale for retention of recordings.**

- Subject to the spending review, a budget was approved for a new Audio Visual and live-streaming system in February 2026.
- A procurement exercise is ongoing with bids received.
- A Data Protection Impact Assessment (DPIA) is required.
- Current retention remains in accordance with records management requirements, which is that live streams are deleted after the minutes of the meeting have been approved.
- Under data protection rules, there needs to be a specific purpose for retaining live streams.
- Members have previously suggested retaining live streams of meetings for training purposes. However, this is not the original purpose for which meetings are live streamed so would be inappropriate from a data protection perspective.

3.9 **RDM7 - 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.**

- Review of the Pre-Application protocol is being prepared.
- Member training has been provided that included engagement in pre-application processes.
- Further PAS training is planned about member involvement in pre application discussions.

3.10 **RDM8 - To undertake a review of the planning committee site visit process to encourage better attendance.**

- The Constitution Review Working Group was updated in September 2026.
- Average attendance is approximately three members per monthly site visit.
- Attendance records are maintained by the Development Management Manager.

3.11 **RLP1 - Build political consensus**

- Independent support from DAC Planning was commissioned and delivered through facilitated workshops and training.
- Members have developed a stronger understanding of Local Plan requirements, and progress has been made in building consensus, including unanimous support for Gateway 1 and agreement that the Green/Grey Belt Assessment is complete.
- There is consensus on the need to progress the Local Plan. Further work through the LPCPWG will focus on building consensus as detailed spatial and site choices are considered.

3.12 **RLP2 Review the operation and terms of reference for the strategic planning steering group (SPSG)**

- The LPCPWG is established and operating in accordance with its agreed Terms of Reference.
- The LPCPWG is now the primary forum for member consideration of Local Plan matters and includes a non-voting Chair.
  The Group provides an established framework for maintaining progress and supporting developing cross-party consensus as the Local Plan develops.

3.13 **RLP3 Develop the strategic spatial vision and complete evidence base.**

- Completion of a Green Belt Assessment.
- Member workshops on spatial vision and development strategy.
- Commissioning of the Housing and Economic Development Needs Assessment (HEDNA).
- Other evidence base elements are being commissioned.

3.14 **RLP4 Secure infrastructure delivery commitments as a priority.**

- Positive engagement has occurred with WCC.

- An MoU has been agreed - please refer to Appendix 3
- Ongoing NHS engagement is taking place on health infrastructure planning.
- Procurement of viability and Community Infrastructure Levy (CIL) assessment work is ongoing.

3.15 **RLP5 Strengthen Programme Management and Resources.**

- The Local Plan timetable was approved by full Council in May 20.26, and a detailed project management framework has been established.
- The Local Plan programme is now a standing item at meetings of the LPCPWG, with regular monitoring of progress and risks.

3.16 **RLP6 Continue active senior leadership support**

- The Local Plan has been included on the Corporate Risk Register.
- Regular reporting occurs to senior leadership.
- There is Senior Leadership Team (SLT) attendance at LPCPWG meetings.

3.17 **RLP7 Introduce a training and support programme for councillors.**

- All members were invited to take part in local plan training over the summer of 2026.

3.18 Additional Actions Following the PAS Review:

Officers have further built on the recommendations following the PAS review and developed several additional actions.

1) Providing more regular updates in the members' bulletin to keep all members informed of local plan progress.
2) Regular meetings with the chair of planning committee to review the functioning of planning committee meetings
3) Regular portfolio holder meetings to address matters across all planning functions
4) Regular review of resources to ensure teams can continue to deliver and respond to demands placed on the service
5) Informing members of national changes as they occur with an invitation to contact officers with any queries
6) Maximising staff training and development opportunities

4. FINANCIAL IMPLICATIONS

4.1 There are no financial implications related to agreeing the updated action plan as further training can be accommodated from existing budgets and income. Spend to date has been managed via some direct support from PAS and planning budgets.

5. LEGAL IMPLICATIONS

5.1 Planning Committee members have consistently been provided with bespoke planning training over many years. Providing the additional planning training identified in the PAS review and clarifying roles will strengthen compliance with the statutory framework for planning and enforcement decisions as well as embed new arrangements following the introduction of a new national scheme of delegations for planning functions.

5.2 Similarly, Members' Code of Conduct and standards training has been consistently provided to Members on an annual basis. Further training in future also is intended to reinforce the legal framework governing councillor behaviour, including the Code of Conduct.

5.3 Other actions will clarify expectations between parties and strengthen compliance with administrative law.

5.4 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

Local Government Reorganisation

6.1 Strategic Planning and Development Management functions remain statutory functions and must continue to be implemented irrespective of the progress on Local Government Reorganisation.

Relevant Council Priority

6.2 The information provided in this report has implications for the following Council priorities:

Economic Development;
Housing; and
Environment and Infrastructure.

Climate Change Implications

6.3 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.

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

6.5 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 electric vehicle (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.

6.6 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.

Equalities and Diversity Implications

6.7 Implementing 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 helps 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.

Community Impact Implications

6.8 The new local plan and sound development management decisions will contribute to community safety, health and well-being objectives. In this context implementing the PAS recommendations is positive.

7. RISK MANAGEMENT

7.1 The risks associated with the progression of the Bromsgrove District Plan are being monitored by the Council's corporate risk register COR0017 and as a standing item for discussion at LPCPWG meetings. Currently the Council remains on track to deliver the local plan in line with the adopted timetable.

7.2 From a Development Management perspective, risk centres around the speed and quality of decision making and government sanctions are in place if either fall below relevant thresholds. Implementing the action plan to address the issues identified by the PAS report, reduces the risks especially around the quality assessment and would ensure that good decisions are being made. Departmental risk monitoring and mitigation remains in place and is regularly discussed with the Service's Assistant Director.

7.3 Lack of five-year housing land supply is an issue. This exposes the council to the tilted balance, increasing the likelihood of additional development pressure.

7.4 There is a risk of government intervention in plan-making if progress is not made.

7.5 Fragmented political control increases the risk of inconsistent decision making and difficulty achieving cross-party consensus on strategic planning matters.

7.6 Councillors face ongoing tension between green belt protections and government housing delivery expectations, increasing decision risks.

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7.7 Delays and unresolved issues can lead to appeals for non-determination, removing control from the Council.

7.8 Focus on minor details at Planning Committee risks missing strategic planning considerations and weakens the planning balance.

7.9 Limited early engagement in terms of councillor involvement at pre-application and pre-committee stages leads to unresolved concerns surfacing late
in the process.

7.10 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.

7.11 In terms of planning enforcement, 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.

7.12 Strain between officers and councillors risks deterioration in working relationships and organisational culture. This could result in staff departures and recruitment difficulties, reducing capacity and institutional knowledge, which would add to pressures on staff.

8. APPENDICES and BACKGROUND PAPERS

Appendix 1 - Planning Advisory Service Recommendations updated Action Plan
Appendix 2 – Local Plan Cross Party Working Group Terms of Reference
Appendix 3 – Memorandum of Understanding between Bromsgrove District Council and Worcestershire County Council (this appendix may contain exempt information).

BROMSGROVE DISTRICT COUNCIL

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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Cllr Sue Baxter	30/10/26
Lead Director / Assistant Director	Guy Revans Executive Director Ruth Bamford Assistant Director	
Financial Services		
Legal Services	Nicola Cummings, Principal Solicitor – Governance Jess Bayley-Hill, Principal Democratic Services Officer	28/10/26
Policy Team (if equalities implications apply)		
Climate Change Team (if climate change implications apply)	Matt Eccles Climate Change Lead	

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