



Monday, 30 June 2025

Tel: 01285 623226

e-mail: [Democratic@cotswold.gov.uk](mailto:Democratic@cotswold.gov.uk)

### OVERVIEW AND SCRUTINY COMMITTEE

A meeting of the Overview and Scrutiny Committee will be held in the Council Chamber - Council Offices, Trinity Road, Cirencester, GL7 1PX on **Tuesday, 8 July 2025 at 2.00 pm.**

A handwritten signature in black ink, appearing to read 'Rob Weaver'.

Rob Weaver  
Chief Executive

To: Members of the Overview and Scrutiny Committee  
(Councillors Gina Blomefield, Angus Jenkinson, David Cunningham, Tony Slater, Lisa Spivey, Clare Turner, Michael Vann, Jon Wareing, Joe Harris and Nick Bridges)

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

# AGENDA

1. **Apologies**

To receive any apologies for absence. The quorum for the Overview and Scrutiny Committee is 3 members.

2. **Substitute Members**

To note details of any substitution arrangements in place for the meeting.

3. **Declarations of Interest**

To receive any declarations of interest from Members relating to items to be considered at the meeting.

4. **Chair's Announcements**

To receive any announcements from the Chair of the Overview and Scrutiny Committee.

5. **Public Questions**

A maximum of 15 minutes is allocated for an "open forum" of public questions at committee meetings. No person may ask more than two questions (including supplementary questions) and no more than two such questions may be asked on behalf of one organisation. The maximum length of oral questions or supplementary questions by the public will be one minute. Questions must relate to the responsibilities of the Committee but questions in this section cannot relate to applications for determination at the meeting.

The response may take the form of:

- a) A direct oral response (maximum length: 2 minutes);
- b) Where the desired information is in a publication of the Council or other published work, a reference to that publication; or
- c) Where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

6. **Member Questions**

A maximum period of fifteen minutes is allowed for Member questions. Questions must be directed to the Chair and must relate to the remit of the committee.

Questions will be asked in the order notice of them was received, except that the Chair may group together similar questions.

The deadline for submitting questions is 5.00pm on the working day before the

day of the meeting unless the Chair agrees that the question relates to an urgent matter, in which case the deadline is 9.30am on the day of the meeting.

A member may submit no more than two questions. At the meeting the member may ask a supplementary question arising directly from the original question or the reply. The maximum length of a supplementary question is one minute.

The response to a question or supplementary question may take the form of:

- a) A direct oral response (maximum length: 2 minutes);
- b) Where the desired information is in a publication of the Council or other published work, a reference to that publication; or
- c) Where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

7. **Local Plan Update** (Pages 5 - 40) – 60 minutes

Purpose

That the Committee scrutinises the report and agrees any recommendations it wishes to submit to Cabinet on 9 July 2025.

Cabinet Member

Councillor Juliet Layton

Lead Officers

Geraldine LeCointe

Jo Symons

8. **PAS Peer Review and Action Plan** (Pages 41 - 72) – 60 minutes

Purpose

That the Committee scrutinises the report and agrees any recommendations it wishes to submit to Cabinet on 9 July 2025.

Cabinet Member

Councillor Juliet Layton

Lead Officer

Geraldine LeCointe

(END)

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Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET – 10 JULY 2025</b>
Subject	<b>Local Plan Update</b>
Wards affected	All
Accountable member	Councillor Juliet Layton Deputy Leader of Cotswold District Council and Cabinet Member for Housing and Planning Email: <a href="mailto:Juliet.Layton@cotswold.gov.uk">Juliet.Layton@cotswold.gov.uk</a>
Accountable officer	Geraldine LeCointe – Assistant Director of Planning Services Email: <a href="mailto:Geraldine.LeCointe@cotswold.gov.uk">Geraldine.LeCointe@cotswold.gov.uk</a>
Report authors	Jo Symons – Head of Planning Policy and Infrastructure Email: <a href="mailto:Jo.Symons@cotswold.gov.uk">Jo.Symons@cotswold.gov.uk</a>
Summary/Purpose	To confirm the way forward for the Local Plan Update
Annexes	Local Plan Oversight Board Terms of Reference July 2025
Recommendation(s)	<p>That Cabinet recommends for Council to resolve merge the two ongoing Local Plan projects:</p> <ul style="list-style-type: none"> <li>the partial update of the adopted Cotswold District Local Plan (2011-2031); and</li> <li>the Development Strategy and Site Allocations Plan,</li> </ul> <p>into a single comprehensive Full Local Plan Update in conjunction with incorporating work of the Gloucestershire Strategic Plan, where appropriate, with a view to submission in 2026 and adoption in 2027.</p> <p>That, if this is approved by Council, Cabinet resolves to:</p> <ol style="list-style-type: none"> <li>Update the Council's Community Infrastructure Levy in parallel with the Local Plan process.</li> </ol>



	<ol style="list-style-type: none"><li>2. Invest in additional resources to accelerate the delivery of the Local Plan to enable the December 2026 submission deadline to be hit.</li><li>3. Confirm the delivery of the Local Plan as a Council priority.</li><li>4. Establish a Local Plan Oversight Board and confirm a new Terms of Reference.</li></ol>
Corporate priorities	<ul style="list-style-type: none"><li>• Responding to the Climate Emergency</li><li>• Delivering Housing</li><li>• Supporting Communities</li><li>• Supporting the Economy</li></ul>
Key Decision	YES
Exempt	NO
Consultees/ Consultation	Local Management Team



## **1. EXECUTIVE SUMMARY**

- 1.1** Cotswold District Council began updating its Local Plan<sup>1</sup> in June 2020. Since then, significant progress has been made.
- 1.2** Initial work was primarily to make the adopted Local Plan 'Green to the Core' in response to the Council's climate change and ecological emergency declarations. In January 2024, the Council also began making preparations to deliver development requirements beyond 2031 (the end of the adopted Local Plan period).
- 1.3** Due to a deadline to submit Local Plans under the current planning regulations, which were considered to be more advantageous to the Council than the new planning regulations, and uncertainty around expected national planning policy changes at the time it was decided to keep the two Local Plan projects separate but progress them in parallel. The intention was to combine the two Local Plan projects into a single comprehensive Full Local Plan Update further down the line if it was possible to do so, allowing the Council to keep its options open and 'hedge its bets'.
- 1.4** Since then, the government has undertaken radical changes to national planning policies. These included:
- Introducing a new centralised calculation of the number of homes needed in each local planning authority area, which more than doubled the number of homes the government calculates to be needed in the district to 1,036 homes a year<sup>2</sup>; and
  - Extending the deadline to submit Local Plans to the Secretary of State for independent examination in public from June 2025 to December 2026.
- 1.5** As a result, Cotswold District no longer has a five-year housing land supply. The adopted Local Plan policies governing the supply of housing are now out-of-date and must be updated. There may still be justification to refuse planning applications for new homes. However, the harms of granting planning permission must now significantly and demonstrably outweigh the benefits. The 1,036 home a year target has potential to harm the district with an increase of unplanned developments. The

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<sup>1</sup> Cotswold District Local Plan (2011 to 2031) – adopted 3 August 2018

<sup>2</sup> Note, this figure is updated annually to incorporate updated housing affordability data.



Council is already receiving a large increase in planning applications for new homes on greenfield sites next to towns and villages in the district.

**1.6** Cotswold District is a truly special place, and the district has many “areas and assets of particular importance” that the Council must protect. For example, the district has:

- 80% of its land area within the Cotswolds National Landscape (a greater coverage by a National Landscape designation than any other district in England);
- 144 Conservation Areas (more than any other district in England);
- Over 5,000 entries on the statutory list of buildings of special architectural and historic interest (second after City of Westminster);
- 239 Scheduled ancient monuments;
- 32 registered historic parks and gardens;
- 38 Sites of Special Scientific Interest;
- Over 260 locally designated wildlife sites;
- 1 registered battlefield; and many more.

**1.7** Further land is susceptible to high flood risk, where development should be avoided.

**1.8** National planning policies specify that all these areas and assets of particular importance can justify a lower housing requirement in the adopted Local Plan than the 1,036 homes a year that the government calculates to be needed in the district. However, until a new Local Plan is adopted, the Council must continue to use the 1,036 home a year target as the basis for measuring its five-year housing land supply.

**1.9** Local Government Reorganisation is also on the horizon. Cotswold is currently set to become part of a unitary authority in April 2028.

**1.10** Council is not being asked to support a new Local Plan. It is being asked to combine the two ongoing Local Plan projects into a single comprehensive Full Local Plan Update – something which was always the intention to do. The key ask is that, in making this decision, Cabinet commits itself to prioritising and resourcing the Local Plan so that the updated Local Plan can be submitted for examination by December 2026.





**1.11** This is an ambitious target, and its delivery will require some streamlining of the current Local Plan process, as well as investment in staff resources<sup>3</sup>. However, it also has significant benefits to the Council:

- i. The Council will be able to adopt its Local Plan and regain its five-year housing land supply as fast as possible.
- ii. The Council will have an adopted Local Plan that can be transferred to the new unitary authority, which will provide a long-lasting legacy for Cotswold District Council.
- iii. There is an opportunity to increase the amount of affordable housing, especially social rented housing, from developments, whilst also increasing the proportion of smaller and more affordable house types.
- iv. The district's areas and assets of particular importance will have greater protection, and these may provide justification to set a lower housing requirement in the Local Plan.
- v. The Council will be able to deduct any previous over-delivery of housing on its Local Plan housing requirement from the remaining requirement that its five year housing land supply is measured against.
- vi. The Council will be able to update its Community Infrastructure Levy to help secure infrastructure first development.

**1.12** Aiming to deliver this target is also not without risk. For example, there have been various national policy consultations and rule changes that have already delayed the delivery of the Local Plan, and there may be further changes ahead. However, even if the Council does not submit the Local Plan by December 2026, all is not lost. There may be other opportunities including through the new government regulations to submit a Plan, particularly if government reorganisation is delayed. The important issue is that progression on the Plan needs to continue at pace to ensure that a legacy is set for Cotswold District that ensures development takes place in the right places with an infrastructure first approach.

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<sup>3</sup> Any necessary staff resources would be fixed term for two years. Any other additions are being made from the existing budget.



## SUMMARY TIMELINE

Cotswold District Council began updating its Local Plan<sup>4</sup> in June 2020. This report recommends the Council to continue updating its adopted Local Plan through the merger of the ongoing Partial Local Plan Update and the Development Strategy and Site Allocations Plan and progress a single, unified Local Plan to submission. With 80% of the district designated as National Landscape and a further 4% with other nationally protected characteristics or constraints, there may be justification for the Council to set a lower housing requirement figure, thus enabling the Council to locate development and its associated infrastructure in the right places.

- 2018: Plan adopted
- 2020: Decision to do partial review to make Plan green to core
- 2023: Review of housing requirement – no significant change to housing need so no need to update housing requirement
- 2024: Decision to do Site Allocations Document – Feb/March 2024 Reg 18 Issues and Options Consultation on DM policies & on Development Strategy
- December 2024: Government introduces new standard method for calculating housing need – significant change with Cotswold District Council now needing to provide 1,036 homes a year, triggering statutory requirement to update the Plan.
- April 2025: Planning Advisory Service (PAS) review – concludes it is critical for the Council to prioritise options that deliver an up-to-date Local Plan without delay.
- June 2025: Development management policies 'green to core' and substantially ready for Regulation 19 draft Plan consultation BUT site allocations required to meet new housing requirement figure. Now require further evidence for site allocations and selection of site allocations > further consultation required on approach to site selection in area – to take place in Autumn 2025
- Spring 2026: Consultation on Draft Plan and allocated sites
- December 2026: Submission of Local Plan for examination through existing regulations<sup>5</sup> (the new regulations expected may provide an alternative route for submitting the Plan although there is currently only one option of submitting a Plan under the current regulations in December 2026)
- 2028: Adoption

<sup>4</sup> Cotswold District Local Plan (2011 to 2031) – adopted 3 August 2018

<sup>5</sup> Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK  
Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK



## 2. BACKGROUND

**2.1 Terminology:** This report refers to several types of plan-making terms, so the following definitions provide a useful reference:

- **Adopted Cotswold District Local Plan 2011-2031 (the adopted Local Plan):** The extant plan used to determine planning applications.
- **Partial update of the Cotswold District Local Plan 2011-2031 (Partial Local Plan Plan):** The plan the council has been preparing to date. It updates parts of the adopted Local Plan, mostly the development management policies, and it does not extend the plan period or alter the development strategy.
- **Development strategy:** This is a core component a local plan. It specifies the quantum and location of development to meet identified needs.
- **Development Strategy and Site Allocations Plan:** Specifies the quantum and location of development in Cotswold District during the period 2026 to 2041.
- **Full Local Plan Update:** It combines the Partial Local Plan Update and the Development Strategy and Site Allocations Plan into a single comprehensive Full Local Plan Update that meets development needs beyond 2031. To achieve this the Full Local Plan Update would need to be submitted to the Secretary of State for independent examination in public by 31 December 2026.
- **New Style Plan:** The government is changing how future local plans are made. From 1 January 2027 authorities that haven't already submitted their draft local plan for independent examination in public will need to prepare and submit their local plan using new plan-making regulations. A New Style Plan would include a new/updated development strategy and a few development management policies of local importance that are not covered by the new National Development Management Policies (a new sister document to the National Planning Policy Framework, which the government proposes to consult on in 2025).

**2.2 Progress on the Local Plan:** The following sets out the timeline of work that has been undertaken on the Local Plan update so far:

- **August 2018:** Cotswold District Council adopts its Local Plan<sup>6</sup>.

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<sup>6</sup> [Cotswold District Local Plan \(2011-2031\)](#)



- **June 2020:** A review of all the adopted local plan policies<sup>7</sup> was completed to assess whether they required updating. In response, the Council commenced a partial update of the adopted Local Plan (the Partial Local Plan Update), primarily to make the Local Plan 'Green to the Core' in response to the Council's climate change and ecological emergency declarations. The Partial Local Plan Update also responded to national planning policy changes and made improvements to the Local Plan in response to feedback from the Council's Development Management team from their experience of using the newly adopted Local Plan.
- **February / March 2022:** The Council undertook an initial consultation (known formally as a Regulation 18 consultation) on the Partial Local Plan Update to identify 'Issues and Options' that the Local Plan needed to respond to.
- **August 2023:** A further review of the adopted Local Plan housing requirement was completed to establish whether this required updating. A relatively small percentage increase of 4.95% was found to be well within the bounds of flexibility, and the change was not deemed to be "significant". It was concluded that the adopted Local Plan housing requirement did not require updating and could continue to be used as the basis for measuring the five-year housing land supply.
- **January 2024:** As there would soon be less than five years remaining of the Local Plan period, it was decided to proactively begin the process of planning for development requirements beyond 2031 before a lack of a five-year housing land supply became an issue. The Council therefore approved the commencement of a Development Strategy and Site Allocations Plan (2026-41). It was decided to keep the two Local Plan projects separate due to a government-imposed deadline of June 2025 to submit Local Plans to the Secretary of State for examination in public under the current Local Plan regulations. Plans submitted after this date would be examined under new planning regulations, which although the detail had not been published were believed to be less advantageous for the Council's aspirations. It was recommended to keep the situation under review in the hope of being able to

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<sup>7</sup> Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 makes it a legal requirement for planning authorities to review their local plan every five year.



combine the two Local Plan projects. It was highlighted that doing so would bring considerable financial savings.

- **February / March 2024:** The Council undertook consultations on both the 'Draft Policies' of the Partial Local Plan Update and 'Issues and Options' for the Development Strategy and Site Allocations Plan, the latter considering development options beyond 2031. This concluded that the Local Plan should focus development in and around the district's principal settlements and transport nodes, as well as exploring whether strategic scale development around Moreton-in-Marsh as a Principal Settlement with a railway station would be feasible. This strategy was based on the housing target of the previous government, which at that time was 493 homes a year.
- **December 2024:** The newly elected Government produced a revised version of the National Planning Policy Framework (December 2024) (the NPPF). The changes included a new, mandatory Standard Method for calculating the number of homes needed in each local planning authority area. Areas with the highest levels of unaffordable housing were given increased housebuilding targets. As a result, and due to high house prices in Cotswold District, the district received a more than 100% increase in its target. more than doubling of its target. The number of homes needed in the district is now calculated to be 1,036 homes a year. Due to this being a significant change, the NPPF requires an update to the local plan housing requirement. The national policy changes also extended the deadline from June 2025 to December 2026 to submit local plans to the Secretary of State for examination in public under the current planning regulations Authorities that do not meet the December 2026 submission deadline will need to prepare plans under the new planning regulations, although the detail of these is still awaited<sup>8</sup>.
- **March 2025:** The Planning Advisory Service completed a review of the Planning Service, which concluded that: *both internal and external stakeholders have expressed concerns regarding the progress of developing an up-to-date Local Plan. This delay poses risks not only to the delivery of key corporate objectives*

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<sup>8</sup> [Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK](#) (note Chapter 2 and Chapter 6)



*but also to the planning service itself, as not having an up-to-date Local Plan can lead to unplanned development. The council faces several important challenges that require a strategic focus and for which the Local Plan is an important delivery tool. These include an increase housing need in nationally mandated figures and the exploration of growth options for residential and economic development, all within the context of ongoing national changes to the planning system. An up-to-date Local Plan is essential for establishing the spatial framework for the area, ensuring development occurs in appropriate locations. Consequently, it is critical for the council to prioritise options that facilitate the creation of a comprehensive and up-to-date Local Plan without delay. Conducting an options appraisal and implementing robust project management and governance frameworks will be essential to this process.*

- **July 2025:** The partially updated Local Plan policies and their evidence base are substantially complete in readiness for the final stage of public consultation (formally known as Regulation 19 consultation). The Development Strategy and Site Allocations Plan has undergone an Issues & Options (Regulation 18) consultation. Various evidence is completed or is in train, including a Settlement Role and Function Study to assess the sustainability of settlements; a Broad Locations Study and Strategic Housing and Economic Land Availability Assessment Update to identify sites; Moreton-in-Marsh Feasibility Study to assess the feasibility of development in Moreton; Infrastructure Delivery Plan to ensure the right infrastructure is provided to support developments; Housing and Economic Needs Assessment to ensure the Local Plan provides for the right homes and job types to support the district's population; a Town Centres Study to protect our town centres whilst enabling them to diversify and remain viable; and many more.

**In summary, a substantial amount of work has already been completed or is underway on both Local Plan projects, which can be transferred into the single comprehensive Full Local Plan Update.**

- 2.3** The proposed option in this report builds on the work completed since the Local Plan update commenced in 2020. It demonstrates that by merging the two ongoing Local Plan projects into a single comprehensive Full Local Plan Update, the Council will be able to submit a Local Plan for examination that is green to the core and that addresses



the district's significantly increased housing target. Once adopted, the Local Plan can be carried forward into the new Unitary Authority as the adopted Plan for the Cotswold District. This Plan would then be the Plan by which development applications are determined and will remain so until such time as the new unitary authority produces its own plan, which may take up to five years post vesting.<sup>9</sup>

### **3. MAIN POINTS**

- 3.1** It is a statutory requirement for all local planning authorities to have an up-to-date local plan. A significant amount of work has already been completed to proactively deliver a single and comprehensive Full Local Plan Update through the two ongoing Local Plan projects. Given the government's significantly increased housing target for the district, which mean the Council can no longer use some of the most important policies from its adopted Plan to determine planning applications, an updated Local Plan is now urgently needed.
- 3.2** Paragraph 34 of the NPPF provides: *Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."*
- 3.3** Furthermore, members will be aware that due to the new Government housing figure, the Council no longer has a five-year housing land supply (5YHLS) of deliverable housing sites. The recently published 5YHLS report established that the Council has a 1.8 year supply. This means that the tilted balance in favour of granting planning permission to sustainable housing developments now applies. The balance is whether the harms 'significantly and demonstrably' outweigh the benefits of granting permission. This is where the decision-maker will afford varying degrees of weight to the harms and benefits associated with a proposed development (NPPF, paragraph 11d). The result is that the Council is already receiving a significant uplift in speculative applications for housing developments, and this can be expected to continue. Each

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<sup>9</sup> *Town and Country planning: The Transition Regulations make clear that a local development document (such as a development plan) adopted by a predecessor council prior to re-organisation shall continue to apply after reorganisation as if it had been adopted by the unitary authority in relation to the area the plan covers. Additionally, the new unitary must adopt its own local development plan within 5 years of the re-organisation date.*





application must now be considered on its merits, and with no 5YHLS, the presumption would be in favour of granting planning permission in unplanned locations.

- 3.4** National Landscapes are a location where the harm caused by the proposed development may significantly outweigh its benefits. However, it is a nuanced and subjective process, and not as clear-cut as one benefit outweighs one harm. Each would require a specific individual assessment to be undertaken, on a case-by-case basis.
- 3.5** The Council has enjoyed a long period with a low number of appeals, but this is likely to change because the Council no longer has an up-to-date Local Plan or a 5YHLS.

**Additional benefits of fast tracking the Local Plan**

- 3.6** Through updating the Local Plan, the Council has the opportunity to seek to reduce its housing requirement figure.
- 3.7** Paragraph 11 of the NPPF specifies that, "*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>, unless:*
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or*
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."* (emphasis added)

Footnote 7: "*The policies referred to are those in this Framework (rather than those in development plans) relating to: **habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as***





***Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.***”(emphasis added to show the protected areas and assets of particular importance in Cotswold District that may justify a lower housing requirement).

- 3.8** This means that if a local planning authority has evidence to show that it cannot meet the government’s housing requirement figure, then a reduced figure would be allowed if the Plan was found sound at examination. The Plan would then be adopted on that basis.
- 3.9** Officers are currently undertaking a Broad Locations study which looks at the constraints of the district and assesses where appropriate locations may be situated for new settlements or extensions to existing settlements.
- 3.10** Paragraph 189 of the NPPF provides that: *Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues.* Therefore, there can be no strategic sites within the National Landscape which covers 80% of the district.
- 3.11** This leaves 20% of the district. However, a further 4% is either land covered by other protected areas and assets of particular importance referred to in NPPF Footnote 7 or land which is already developed, leaving only 16% of the district as possible options for strategic sites. In addition, this remaining land will have further constraints which may limit development options (e.g. land not being available for development). Therefore, it is highly likely that the Cotswold District will not be able to provide for the full 1,036 homes per year in the district and that the Council would then have to provide for a reduced housing figure, whilst looking to other adjoining authorities to help in providing for the district’s housing need; the Planning Policy and Infrastructure team has already reached out to other districts in this regard. Notably, Exmoor National Park Authority, which has the same status of protection in the NPPF as the Cotswolds National Landscape, successfully argued for a significantly reduced housing requirement when they adopted their plan in 2017, arguing that the National Park has the highest status of protection and therefore has exceptional circumstances.



*Community Infrastructure Levy and Infrastructure Delivery Plan Update*

- 3.12** 'Infrastructure First' is a prominent ambition of the Council. This approach to planning development provides an opportunity to improve the district's local infrastructure and the regeneration of our towns and villages, whilst expanding the modal shift from cars to public transport and active travel. This can be achieved by coordinating the Local Plan with infrastructure providers, enabling them to make long-term investment decisions and plan their delivery programmes based on the pipeline of development set out in the Council's Local Plan. Development that is not plan-led is less likely to benefit from this longer-term infrastructure planning and is unlikely to provide the infrastructure benefits that would be secured in an updated Local Plan. Local services, such as hospitals, doctors, schools, transport infrastructure and sewage treatment works would therefore be likely to be further stretched due to the lack of planned investment and new facilities.
- 3.13** Cotswold District is a highly desirable place to live and work, and our residents rightly expect that the infrastructure to meet their needs is delivered alongside economic and residential growth. Infrastructure must keep up the pace, so the Council can maintain truly sustainable, cohesive communities with their own identity. Sometimes our residents have mixed or less-positive feelings about development in their area, but they do appreciate the infrastructure improvements which flow from it. This is a positive outcome that the Council can provide to its residents.
- 3.14** To deliver on this promise, and to mitigate the impact of developments, the Council relies significantly on financial contributions from developers via the Community Infrastructure Levy (CIL).
- 3.15** CIL is a set charge on the developer per square metre of built development (with some exceptions). The rate of charge was last set in the Council's CIL Charging Schedule in 2018. This was based on a 2016 assessment<sup>10</sup> of the infrastructure that was required to support the now adopted Local Plan. The cost of that infrastructure and the funding gap was also assessed. The Council's annual Infrastructure Funding Statement (IFS) monitors what has been delivered and what remains in the pipeline.
- 3.16** Whilst the Council's CIL rate is indexed to reflect the market, it does not (and cannot) reflect the changing overall cost of infrastructure or changing infrastructure needs. For

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<sup>10</sup> Cotswold District Infrastructure Delivery Plan (Arup, 2016)



example, infrastructure needs can change over time with the constant rate of growth. There can also be changing circumstances, such as the need to respond more urgently to climate change and reduce private car travel rising up the priority list.

**3.17** Irrespective of this, planning for growth beyond 2031 will have additional infrastructure requirements. It is therefore fundamentally important that the district's infrastructure requirements for the new Local Plan period are reassessed, and that this assessment takes consideration of the district's current priorities. It is only by following this process that the Council can review its CIL rate of the charge.

**3.18** The following actions are therefore proposed:

- Update the Infrastructure Delivery Plan (last updated 9 years ago); and
- Review the CIL charging schedule (last updated 7 years ago).

**3.19** The cost of updating the Infrastructure Delivery Plan and Community Infrastructure Levy charging rate is built into the costings provided in the Financial Implications section. There are no existing deadlines for submitting the CIL Charging Schedule for examination. It is envisaged that new Charging Schedule would be consulted at Regulation 19 alongside the Local Plan and the submission of the CIL Charging Schedule will follow on from the submission of the Local Plan and the examination again will follow after. The same evidence will be required to support both CIL and the Local Plan. Previously, the CIL examination followed on after the local plan examination using the same Inspector.

#### *Local Plan Update Timetable*

**3.20** Officers will not be starting from scratch when updating the Plan: the Local Plan update began in 2020 with the partial update of the adopted Local Plan's development management policies and this is now substantially complete, with these policies green to the core. This part of the plan is ready for a Regulation 19 consultation. Work on the Development Strategy and Site Allocations aspect of the Local Plan commenced in January 2024 and has already undergone a Regulation 18 consultation in February/March 2024 when a call for sites was undertaken. Various evidence base work has also already been completed or is nearing completion.

**3.21** In terms of what is required going forwards, given the significant increase to the number of homes the government calculates to be needed in the district, a further



Regulation 18 consultation is required. As noted above, Officers are currently undertaking a Broad Locations Study which looks at the constraints of the district and assesses where appropriate locations may be situated for new settlements or extensions to existing settlements. It is intended that this study will have an Integrated Impact Assessment. A Settlement Role and Function Study is also being undertaken, and this consults our parishes on their facilities and looks at public transport to establish the sustainability of each settlement. From this Study, it is intended that a settlement hierarchy will be established to help in allocating a sustainable level of development across the district whilst considering constraints.

- 3.22** The Regulation 18 consultation will publish these documents alongside a consultation questionnaire to seek views on the most appropriate locations for development; another call for sites will also be undertaken. Further relevant pieces of evidence will be consulted on as and when they are ready including the updated Gypsy and Traveller Assessment, the Town Centre Study, and the Housing and Employment Needs Assessment. These will provide the necessary requirement figures for gypsy and travellers, retail and employment as well as the types of housing required.
- 3.23** Sites will then need to be assessed and allocated and appropriate evidence produced to support a draft Plan. A Regulation 19 consultation of the draft plan and its evidence can then be undertaken in Spring 2026 with a view to submission of the Local Plan to the Secretary of State for examination in December 2026.
- 3.24** In previous local plan consultations, processing the consultation responses has been a labour intensive and time-consuming, and this is a primary reason why local plans across the country take so long. This has been recognised by the government as an issue, and Cotswold District Council has been part of a government funded pilot scheme (Protech) to speed this process up through the use of AI. The Council now has specialist software (Go Vocal and Konveio) that uses AI to both input and then summarise consultation responses. This will bring a considerable time and cost savings compared to past consultations.
- 3.25** To deliver the Local Plan update by the required deadlines, the Local Plan project plan has been streamlined to include essential items and activities only. Similarly, the staff resources needed to accelerate the delivery the Local Plan have been considered. Details of funding these posts are set out in the financial implications of the report.



### *Governance*

- 3.26** To ensure the delivery of the Local Plan remains on track, a Local Plan Oversight Board will be reinitiated. This will include a new Terms of Reference. Monthly updates will be provided to the Board to monitor progress and discuss any arising issues.
- 3.27** A detailed project plan for delivering the Local Plan by the December 2026 submission deadline has been drawn up, alongside a budget and risk register. This will be reviewed monthly and will be shared with the Board. A full time Planning Project Manager will be secured to progress the Plan at pace and minimise any risks.

### *Summary*

- 3.28** In summary, Officers recommend that the work to date on the two ongoing Local Plan projects is merged into a single comprehensive Full Local Plan Update with the intention to go out to Regulation 18 consultation in Autumn 2025 and Regulation 19 consultation in Spring 2026, ahead of submitting the Plan in December 2026. A detailed timetable is available in section 5 and will need to be brought before Cabinet at a later date in the form of an updated Local Development Scheme. Although the timetable may seem ambitious and does contain risk, it needs to be remembered that a significant amount of work has already been completed since 2020, and the Council is already in a relatively advanced position. This is therefore an opportunity for the Council to build on its legacy; to set a deliverable housing requirement figure; to ensure the Plan is green to the core; to take ownership of the Plan without any Government intervention; and to provide an adopted Plan for the Unitary Authority with a five-year housing land supply which will protect the district against inappropriate, unplanned development and will in turn provide the necessary infrastructure required.
- 3.29** A risk register which looks at the risks of progressing the Plan is provided in section 8 with appropriate mitigation measures.

## **4. ALTERNATIVE OPTIONS**

- 4.1** Cabinet may choose not to merge the two Local Plan projects or to look to join with other local planning authorities in the local plan update or to work alongside the other



Gloucestershire Authorities in drawing up a Gloucestershire Strategic Plan whilst updating the Local Plan; they may therefore choose to consider:

**a) Joining with other Gloucestershire Planning Authorities**

- i. The Strategic and Local Plan (SLP) Authorities (formerly known as the Joint Core Strategy Authorities) of Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, took a report to their Joint Advisory Board on 12 June 2025 to look at options of joining with other authorities to take the Plan forward. They have opted to progress the SLP with the three authorities only, whilst taking consideration of the Gloucestershire Strategic Plan.
- ii. Stroud District Council is currently in examination and has its Plan paused due to concerns with transport issues on the M5. They are looking to resolve these issues whilst at the same time exploring taking their plan forward with adjoining authorities.
- iii. Forest of Dean District Council does not adjoin Cotswold District and is looking to take their plan forward for submission in December 2026.

There are many risks with joining with these authorities:

- The need to agree a Plan across one or more authorities will take more time and increase the risk of not meeting the December 2026 deadline. For example, if joining with the SLP authorities, it will take several months to agree the Regulation 19 consultation by all three authorities of the SLP alone. In addition, there is then the need to collate all the consultation responses across three or more authorities, which again takes more time.
- There are numerous unresolved transport issues particularly along the M5 corridor and its junctions that must be overcome, both from the development planned in Tewkesbury through to the Tewkesbury Garden Town, but also in Stroud District, if we were to look to join in a Gloucestershire wide Plan. Stroud has recently had its examination paused due to such concerns.



- The budget of the SLP is £5.5 million over the next three years, which is substantially more than the budget for the delivering Cotswold Plan Update, even when split three ways.

**or**

**b) Undertaking a Local Plan Review in tandem with and to accord with the Gloucestershire Strategic Plan where appropriate**

Due to local government re-organisation, and the likelihood of joining with another or all the Gloucestershire Authorities to form a Unitary, the Gloucestershire councils are looking to work together to provide a Gloucestershire Strategic Plan. Cotswold District Council is committed to this process and there is therefore the option to update the Cotswold Local Plan whilst taking account of the Gloucestershire Strategic Plan. This may include, for example, a Gloucestershire wide vision and aligned strategic objectives for the respective Local Plans across Gloucestershire.

Irrespective of this option, the Council is already undertaking various joint evidence base studies with the other Gloucestershire councils, which not only builds a picture of Gloucestershire at a point in time in preparation for a Unitary but also saves on cost. This work can contribute to the Gloucestershire Strategic Plan. However, undertaking a Gloucestershire Strategic Plan will have its own resource and financial costs and implications.

**or**

**c) Awaiting the new regulations to progress the Plan**

At the time of writing the new regulations for progressing a Plan are yet to be revealed. Currently there is only one option in terms of submitting the Plan by December 2026. There may be other options in terms of submitting the Plan under the new regulations at a later date, and if government reorganisation gets delayed this may be a favourable option for the Council, particularly if there is delay in progressing the plan. PAS are providing workshops to advise on how to align evidence to ensure it complies with the new regulations, and council officers will be attending PAS's Southwest workshop in regard to this. This option may be appropriate to explore further in the future, but at present does



not provide the accelerated timetable option to progress the Plan at pace to ensure the Council has an up-to-date Plan and a 5YHLS.

**or**

**d) Not undertaking a Plan Update**

This is not a reasonable alternative option but has been included for completeness. The Government has made clear the intention to make rapid progress towards universal local plan coverage both through support and using Government's powers of intervention when needed. Within the new planning reforms, the Government introduced new powers for government intervention where progress on local plans is not being made, bringing in government officers and attributing the bill to the council in question. By not undertaking a review of the Plan, the Council runs the risk of reputational damage through government intervention, being overrun with unplanned development and appeals, and the possibility of judicial review of such a decision and being required to foot the bill for an external organisation delivering the Council's Local Plan.

**4.2** A SWOT analysis for updating the Plan and the various options is provided in Table 1.





**Table 1:** SWOT analysis for updating the Local Plan

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"><li>• The team began a partial update of the Local Plan in 2020, and much work has already been done.</li><li>• Development Management policies are ready for Regulation 19 consultation.</li><li>• Regulation 18 consultation on the development strategy and call for sites undertaken in 2024.</li><li>• Much evidence work has been undertaken and jointly with the other Gloucestershire Authorities.</li></ul>	<ul style="list-style-type: none"><li>• There is a need to undertake further evidence work to support the housing allocations.</li><li>• There would be a need to update some evidence that is deemed out-of-date (more than 2 years old) or overtaken by events.</li><li>• A lack of development opportunities due to the district's constraints and lack of land suitable that is available for development.</li></ul>
<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"><li>• To provide evidence to set a realistically deliverable housing requirement for the district.</li><li>• Developers are already coming forward with large scale strategic sites in areas that may be appropriate for development.</li><li>• If we are already undertaking a Plan update, there may be other opportunities to progress the Plan through the new gateway assessment process, particularly if local government re-organisation is delayed.</li><li>• To align with adjoining councils' local plans and look to deliver the Council's housing need figure through allocations in neighbouring authority plans through the duty to co-operate and memorandums of understanding.</li></ul>	<ul style="list-style-type: none"><li>• Local plans often take a long time to progress and time, and risks will have to be carefully managed to ensure the Council meets the submission date of December 2026.</li><li>• The Government may introduce new guidance or legislation which the Council may have to take account of.</li><li>• Either the Council cannot agree with developers or multiple developers cannot agree with each other on the way forward to progress a strategic site.</li><li>• Unresolvable objections from major stakeholders, such as Natural England, the Environment Agency and Historic England.</li><li>• Consultants delaying the production of evidence.</li><li>• Issues with major infrastructure providers which means we cannot provide the</li></ul>



<ul style="list-style-type: none"><li>• To align the Council's evidence with other Gloucestershire authorities to provide a strong evidence base for Gloucestershire for going into a Unitary Authority.</li><li>• To align with the Gloucestershire strategic plan in particular with the vision and objectives.</li><li>• The deadline for forming a Unitary Authority may change.</li><li>• To create a long-lasting legacy for Cotswold District.</li></ul>	<p>necessary infrastructure to progress our housing sites.</p> <p>Threats if we do not review the Plan:</p> <ul style="list-style-type: none"><li>• Costly appeals.</li><li>• Unplanned development in inappropriate locations.</li><li>• Lack of investment in infrastructure.</li><li>• Government intervention.</li><li>• Reputational damage.</li><li>• Judicial review.</li><li>• Special measures.</li></ul>
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## **5. Project Timeline**

- 5.1** The Local Plan must be progressed at pace to achieve the December 2026 submission deadline. Updating the Plan started with the partial review in 2020, and all the development management policies are now substantially complete and ready for a Regulation 19 consultation. The update of the Development Strategy and sites began in 2024 with a consultation in February/March of that year. Further consultation on the development strategy and where sites are located is required due to the significant increase to the calculation of the number of homes needed in the district. Therefore, it is intended to undertake a further Regulation 18 (Issues and Options) consultation on the broad locations for development and the methodology for establishing a settlement hierarchy. This will take place in Autumn 2025.
- 5.2** Further evidence will need to be completed to support the draft Plan, and site allocations will need to be identified for development. These will be consulted on formerly at the Regulation 19 stage alongside the draft Plan. This consultation will take place in Spring 2026. The Local Plan will then be submitted to the Secretary of State for examination in December 2026.
- 5.3** Some of the required evidence base documents to be produced are dependent on other evidence; the viability assessment for example will be one of the last pieces of evidence to be completed, as all the sites and infrastructure will need to be identified before this work can be completed. After the Regulation 19 consultation and prior to

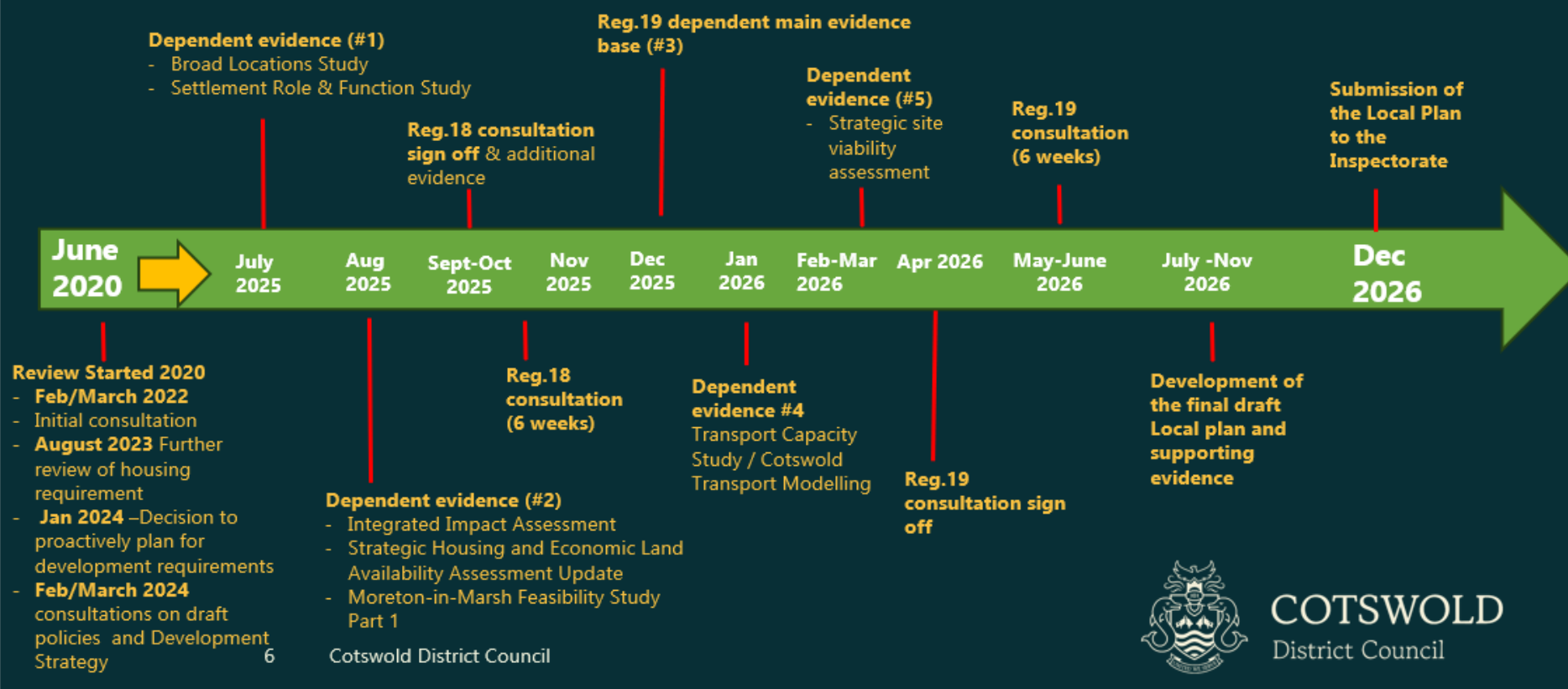


submission, time needs to be allowed to ensure the Council can address any issues raised from the consultation including a schedule of proposed modifications to the draft Plan and producing any necessary additional evidence.

- 5.4** Once the Plan is submitted, progress on the Plan is mainly in the control of the Planning Inspectorate. Further work can be expected throughout the examination process – e.g. responding to Matters, Issues and Questions (MIQs) from the Inspector and the public hearing sessions.
- 5.5** The Government is keen to progress Plans at pace and all Plans submitted under the current regulations will need to be submitted by December 2026. This timing will then allow the Plan to form the adopted Development Plan for the district under the new Unitary Authority.
- 5.6** Please see below the timetable from now until submission and from submission to adoption.



# Local Plan Timeline





# Local Plan timeline from submission to adoption

Submission of the  
Local Plan to the  
Planning  
Inspectorate

Hearings

Main  
modifications  
consultation

Adoption

Dec  
2026

Jan - Mar  
2027

Apr  
2027

May - June  
2027

Jul - Sept  
2027

Oct - Nov  
2027

Dec  
2027

Preparing  
responses to  
Matters,  
Issues and  
Questions  
(MIQs)

Inspector's  
initial report

Inspector's  
final report





## **6. FINANCIAL IMPLICATIONS**

*Money spent to date and remaining reserve balance.*

**6.1** Since commencing the update of the adopted Local Plan in 2020, the Council has spent £762k on the Local Plan. This does include other work and commitments including on the Cirencester Town Centre Masterplan but does reflect the amount of work that has already been completed and demonstrates the level of financial commitment the Council has given to updating the Local Plan.

**6.2** As of 1 April 2025, there was a remaining earmarked reserve of around £1 million to complete the Partial Local Plan Update and the Development Strategy and Site Allocations Plan with an estimated cost of £1.3 to £1.4 million.

**6.3** Switching to a Full Local Plan Update brings a large cost saving of around £300,000 to £400,000 on the Local Plan process, bringing the projected spend back within the £1 million budget. In addition, the work done to date on the Partial Local Plan Update and the Development Strategy and Site Allocations Plan is not abortive work. It can also be translocated into the single comprehensive Full Local Plan Update without cost.

*Cost savings from combining the two Local Plan projects and streamlining the Local Plan process.*

**6.4** The cost savings come from a range of factors, including:

- Requiring only one Local Plan examination instead of two;
- Avoiding the duplication of some evidence base documents (e.g. the viability assessment of the Local Plan policies);
- Streamlining the Local Plan process to doing only what is necessary;
- Needing to undertake only two additional public consultations before submitting the Local Plan for examination, instead of three;
- The use of AI to process and summarise Local Plan consultation responses; and
- Delivering the Local Plan more quickly (i.e. submitting both Local Plan projects by December 2026, instead of the current programme which prioritises the delivery of the Partial Local Plan Update followed by the Development Strategy and Site Allocations Plan after December 2026). This will avoid the cost of having to update / refresh some of the older evidence base documents.

*Recent funding allocated / awarded for the delivery of the Local Plan*



- 6.5** In February 2024, Cabinet resolved to add £500,000 to the Local Plan reserve. This was to ensure the next stages of the Local Plan preparation could be delivered in accordance with the timetable set out in the Cotswold District Local Plan Update report to Council in January 2024. It was highlighted in the January 2024 Council report that *"additional funding will be required should the council need to use the fall-back approach... [i.e. producing a single comprehensive Full Local Plan Update]. This may require up to an additional £500,000, although it is difficult to quantify at this stage as it requires far greater clarity on the new plan-making system. The new system is being advertised as being quicker and more efficient, but this remains to be seen in the absence of secondary legislation. Furthermore, the planning system will continue to operate within a legal framework, where planning judgements need to be justified / evidenced. This is often where the costs and resources sit."*
- 6.6** In February 2025, Cabinet resolved to add a further £250,000 to the Local Plan earmarked reserve. This was to ensure the next stages of the Local Plan preparation could be delivered following the update to the NPPF in December 2024.
- 6.7** In March 2025, the Council was awarded £227,962.50 of grant funding from the MHCLG's Local Plans Delivery Fund (Regulation 18). This funding was contingent on the Council submitting its Local Plan for examination by December 2026. The purpose of this funding is also to accelerate the delivery of the Council's Local Plan in response to the increased housing target.
- 6.8** In March 2025, the Council was awarded a further £70,000 of grant funding from the MHCLG's Green Belt Review Fund. A review of the Gloucester, Cheltenham and Tewkesbury Green Belt, which extends into Cotswold District, is now underway.
- Estimated costs of accelerating the delivery of the Local Plan Update*
- 6.9** The estimated costs for the Plan are provided in Table 2 below. Currently the Local Plan reserve stands at approximately £1 million and the projected spend on the Full Local Plan Update comes broadly within this allocation. This excludes any contingency and does not account for any additional spend resulting from needing to undertake stage 2 of the Moreton-in-Marsh Feasibility Study, which is currently estimated at £215,000.
- 6.10** Costs have been included in the Local Plan budget reserve for additional fixed-term posts to ensure the Plan can be developed at pace. This includes additional hours for



part-time staff in the team; administrative support and the reprovion of hours for other posts. The budget for any permanent posts will come from the existing establishment budget as part of a growth bid; within this we will seek to engage the services of an experienced full-time Project Manager, an Urban Designer and an additional Principal Policy Officer to secure the strategic sites and ensure we can progress the Plan at pace.

**Table 2:** Estimated remaining costs of delivering Full Local Plan Update

Evidence costs	£566,946*
Regulatory Consultations & Examination	£327,000
Additional staffing	£217,075
<b>Local Plan Total</b>	<b>£1,111,021</b>
Other including Cirencester Masterplan	£61,762
<b>Local Plan + Other Total</b>	<b>£1,172,783</b>
Income – Funding	£229,463
<b>Total minus income</b>	<b>£943,320*</b>
<b>LOCAL PLAN RESERVE</b>	<b>£1,004,827</b>
Expenditure 2020 to date	£761,782
Additional costs required if Moreton Feasibility Study Stage two is required	£215,000

\*N.B. Awaiting further costs on the Infrastructure Delivery Plan Assessment

Note, figures exclude any contingency, and any additional expenditure required to progress a Gloucestershire Strategic Plan, as this is unknown to date.

- 6.11** The use of the Local Plan reserve will be kept under review to ensure sufficient funds are set aside to deliver the Local Plan. In doing so, as part of the 2026/27 budget setting process, the Deputy Chief Executive & Section 151 Officer will identify further one-off funding (following the review of earmarked reserves) to be held as a contingency should additional resources be required to accelerate the delivery of the Local Plan to meet the December 2026 submission deadline. In the event of the contingency budget being required, this will only be released subject to the agreement of the Section 151 Officer in consultation with the Leader, Deputy Leader, and Director of Communities and Place.





**6.12**

*Costs of not having an up-to-date Local Plan and no five-year housing land supply*

- 6.13** As noted in paragraph 4.1(d) above and 7.2 below, the Government has introduced new interventionist powers if a Plan is not progressed quickly enough. The Secretary of State can now prepare the Local Plan for the Council or direct the Council on the preparation of its Local Plan. In either case, this would almost certainly have an increased cost compared to the Council preparing its Local Plan in-house, and the Council would be required to foot the bill of the intervention (e.g. the use of consultants rather than officers to deliver the Local Plan).
- 6.14** It is estimated that the Local Plan Update will be adopted in December 2027, and it is likely that the Council will also regain its 5YHLS at this point. There will therefore be a period of around two and a half years when the Council does not have an up-to-date Local Plan or a 5YHLS. During this period, the Council can expect to receive an increase in speculative planning applications for new homes and appeals and this will incur additional costs for the Council.
- 6.15** Whilst there will be a corresponding increase in planning application fee income, there is expected to be an overall net resource and financial cost to the Council. This is both in terms of uplift in workload for the Development Management team to manage the increase in applications and appeals (e.g. this may require more agency workers), as well as the increased financial cost of appeals (e.g. the need for representation by specialist planning consultants, Counsel to defend the Council's decisions, and the risk of the Council being ordered to pay the appellant's costs).
- 6.16** The cost of appeals can vary depending on the issues being contested and whether a public inquiry is required. For comparison, there is currently a non-residential appeal relating to the Steadings which is likely to cost between £10-12,000. However, as an example; three appeals in Tewkesbury Borough, where the 5YHLS was contested, cost Tewkesbury Borough Council £500,000<sup>11</sup>.
- 6.17** The last time Cotswold District Council did not have a 5YHLS in 2014, the Council was in danger of going into special measures due to the number of appeals lost. At that time, it was confirmed that there had been 11 planning appeals in the district during

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<sup>11</sup> [BBC article: Gloucestershire will struggle to stop housing developments' \(8 October 2023\)](#)



2012 and 2013 with the total cost amounting to £257,368.<sup>12</sup> Although the Council regained its 5YHLS in April 2015 appeals continued as developers successfully argued that the Council did not have an up-to-date local plan in place. It was not until 2018 when the Plan was adopted that the appeals stopped.

- 6.18** Recent research indicates that between 2010 and 2017, there were at least 28 appeals, 18 of which were allowed, and two Judicial Reviews where the lack of a 5YHLS and / or an up-to-date local plan was a significant determining factor. The Council was required to pay the appellant's costs on several occasions.
- 6.19** In contrast, since the Local Plan was adopted in 2018, the Council's 5YHLS has not been challenged at appeal. A landmark appeal<sup>13</sup> also found that, despite a development proposal being acceptable in all other respects and having considerable benefits, the Council having an up-to-date Local Plan and a 5YHLS meant the conflict with the adopted Local Plan development strategy and the plan-led approach was sufficient for the Inspector to uphold the Council's decision to refuse the application. The Council has subsequently received little challenge in this regard. Having an up-to-date Local Plan and a 5YHLS also provides a strong basis to refuse planning applications where there are other issues that weigh against granting planning permission.
- 6.20** If it is left to the new Unitary authority to produce the Council's Local Plan, it could be five further years from vesting day until the district has an adopted Local Plan (so over eight years in total from July 2025). During this extended period, the Council and the new Unitary Authority would continue to be open to speculative planning and an ongoing pipeline of appeals. It would be speculative to provide a cost estimate but, suffice to say, it is likely the cost would be much larger in the long-term than if the Council were to adopt its Local Plan as soon as possible.

## **7. LEGAL IMPLICATIONS**

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<sup>12</sup> <https://www.wiltsglosstandard.co.uk/news/11036676.cotswold-district-council-spends-250000-on-planning-appeals-in-the-district-over-the-last-two-years/>

<sup>13</sup> Outline planning application for residential development of up to 40 dwellings (including details of access to be determined) at Moore Land, Collin Lane, Willersey, WR12 7PE (application ref: 17/04765/OUT; appeal ref: APP/F1610/W/19/3229031)



- 7.1** It is a statutory requirement for the Council to produce a Local Plan and keep it up to date<sup>14</sup>. Local Plans, prepared by a local planning authority in consultation with its community, set out a vision and a framework for the future development of an area. Once in place, Local Plans become part of the statutory development plan. The statutory development plan for the area is the starting point for determining local planning applications.
- 7.2** The Government has made clear the intention to make rapid progress towards universal local plan coverage both through support and using Government's powers of intervention when needed. Within the new planning reforms<sup>15</sup>, the Government introduced new powers for government intervention where progress on local plans is not being made, bringing in government officers and attributing the bill to the council in question. By not undertaking an update of the Plan quickly enough, the Council runs the risk of reputational damage through government intervention, being overrun with unplanned development and appeals, and the and the risk of intervention from the government.

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<sup>14</sup> Planning and Compulsory Purchase Act 2004 – Section 19

<sup>15</sup> Planning and Compulsory Purchase Act 2004 – Section 27



## 8. RISK ASSESSMENT

### Risk Assessment for progressing a Local Plan at pace.

Risks to take account of when progressing the Local Plan								
ID	Key risk	Likelihood	Impact	Risk score	Action to mitigate risk	Perceived mitigated likelihood	Perceived mitigated impact	Perceived mitigated risk score
LPR01	Local Plans can take a long time to progress and time and risks will have to be carefully managed to ensure we meet the submission date of December 2026	4	4	16	The reserved budget accounts for additional resource inc. a Strategic Planning and Engagement Project Manager. In addition the project plan provides for contingency. Working with PINS and PAS to ensure we have an effective and efficient project plan.	3	4	12
LPR02	The Government may introduce new guidance or legislation which we may have to take account of	4	4	16	The reserved budget accounts for additional resource and any change in government regulations may provide a different route for the Council secure the local plan.	4	3	12
LPR03	Consultants delaying in the production of evidence	4	4	16	The reserved budget accounts for additional resource inc. a Strategic Planning and Engagement Project Manager. In addition the project plan provides for contingency.	3	4	12
LPR04	Issues with our major infrastructure providers which means we cannot provide the necessary infrastructure to progress our housing sites	3	5	15	Early engagement and the employment of the Strategic Planning and Engagement Project Manager will reduce the impact of this.	3	4	12
LPR05	Unresolvable objections from our major stakeholders of Natural England, the Environment Agency and Historic England	3	4	12	Early engagement and the employment of the Strategic Planning and Engagement Project Manager will reduce the impact of this.	3	3	9
LPR06	Reg.18 responses may raise issues with the development strategy.	3	3	9	Going out to consultation early and dealing with responses as and when they are received.	3	2	6
LPR07	Reg.19 responses raising issues with regard to soundness issues or legality for evidence or the plan	3	3	9	Early meeting with PINS and PAS and regular contact with Counsel. Allowing additional contingency time prior to submission.	2	2	4
LPR08	Either we cannot agree with developers or multiple developers cannot agree with each other on the way forward to progress a strategic site	3	3	9	Adding contingency time within the Local Plan project plan and to agree Statements of Common Ground with developers which will acknowledge disagreements. The Inspector will have to recommend a way forward.	3	3	9



## Risk Assessment if a Local Plan is not progressed at pace.

Risks to take account of <i>not</i> progressing the Local Plan								
ID	Key risk	Likelihood	Impact	Risk score	Action to mitigate risk	Perceived mitigated likelihood	Perceived mitigated impact	Perceived mitigated risk score
NLPR1	Costly appeals	5	5	25	To develop a Local Plan at pace and make it a priority for the Council	5	3	15
NLPR2	Unplanned development in inappropriate locations	5	5	25		4	3	12
NLPR3	Lack of investment in infrastructure	5	5	25		4	3	12
NLPR5	Special measures	5	5	25		2	4	8
NLPR6	Government intervention with costs to the Council	5	5	25		1	2	2
NLPR7	Reputational damage	5	5	25		1	1	1
NLPR8	Judicial review	5	5	25		1	1	1



## **9. EQUALITIES IMPACT**

- 9.1** The policies of the Plan will require an Integrated Impact Assessment (IIA). The purpose of an Integrated Impact Assessment (IIA) is to ensure we comply with the law, taking account of equality, human rights, children's rights and socioeconomic disadvantage (poverty) implications when making decisions. It also ensures decision makers are fully informed, at a formative stage in the decision making process.
- 9.2** This process will allow us to critically assess whether a 'proposal' has wider impacts beyond its intended outcomes and if it impacts differentially on different groups in our communities.

## **10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

- 10.1** The Council has declared a climate change emergency, which commits it to preparing an action plan to show how it will support the district to become carbon neutral. It has also declared an ecological emergency. The Council has also committed to make the Local Plan green to its core. An update to the Local Plan will directly support local communities and businesses to mitigate and adapt to climate change, whilst also making a positive response to the ecological emergency.

## **11. BACKGROUND PAPERS**

[National Planning Policy Framework \(December 2024\) - GOV.UK](#)

Full Council Report (24 January 2024): Cotswold District Local Plan Update

(End)

## **LOCAL PLAN OVERSIGHT BOARD – TERMS OF REFERENCE (JULY 2025)**

The purpose of the Local Plan Oversight Board (“the Board”) is to oversee the update of the Council’s Local Plan, and to address any emerging programming issues.

### **Terms of reference:**

#### **1. Strategic management**

- A. Understand the project plan for updating the Cotswold District Local Plan;
- B. Receive updates on, and monitor progress against, the project plan, key tasks and critical paths;
- C. Agree remedial actions to be taken in the event of any slippage against the project plan;
- D. Receive updates on and results of key pieces of evidence.
- E. Act as a sounding board for any specific issues requiring Member input prior to the submission of formal reports to Cabinet;
- F. Oversee and report to Cabinet on progress made; and
- G. Make recommendations to Cabinet in relation to work programming.

#### **2. Accountability**

The Board is accountable to Cabinet where it will be represented by the Portfolio Holder for Housing and Planning.

#### **3. Performance management**

The Board will be responsible for monitoring and reviewing performance against the Council’s Local Plan project plan. This will also include an oversight of risks.

#### **4. Financial management**

The Board will be responsible for monitoring and reviewing the Local Plan budget in line with the project management plan. This will also include an oversight of risks.

#### **5. Membership**

The Board will comprise:

##### *Cotswold District Council Members*

- Chair: Cllr Mike Every, Leader of Cotswold District Council, Liberal Democrats Group.
- Cllr Juliet Layton, Deputy Leader of Cotswold District Council and Cabinet Member for Housing and Planning, Liberal Democrats Group
- Two additional Cabinet members, Liberal Democrats Group: Andrea Pellegram, Cabinet Member for Environment and Regulatory Services;

## **LOCAL PLAN OVERSIGHT BOARD – TERMS OF REFERENCE (JULY 2025)**

and Tristan Wilkinson, Cabinet Member for Economy and Council Transformation.

### *Cotswold District Council Officers*

- Head of Planning Policy and Infrastructure (Project Lead)
- Assistant Director – Planning Services (Accountable Officer)
- Director of Communities and Place (Project Sponsor)
- Chief Executive Officer
- Strategic Planning Project Manager
- Specialist Officers who are required on an ad-hoc basis

### **6. Arrangements for meetings**

- A. Board meetings will be held monthly as appropriate.
- B. The Board is not a decision making body;
- C. Administrative support (minutes and booking meetings) will be provided by Committee Services; and
- D. Project support will be provided by the Head of Planning Policy and Infrastructure and the Strategic Planning Project Manager.





Council name	<b>COTSWOLD DISTRICT COUNCIL</b>
Name and date of Committee	<b>CABINET - 10 JULY 2025</b>
Subject	<b>ENDORSEMENT OF THE PAS PLANNING SERVICE PEER CHALLENGE REPORT (MAY 2025) AND ACTION PLAN</b>
Wards affected	All wards
Accountable member	Cllr Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning Email: <a href="mailto:Juliet.Layton@cotswold.gov.uk">Juliet.Layton@cotswold.gov.uk</a>
Accountable officer	Geraldine LeCointe, Assistant Director – Planning Email: <a href="mailto:Geraldine.LeCointe@cotswold.gov.uk">Geraldine.LeCointe@cotswold.gov.uk</a>
Report author	Helen Martin, Director of Communities and Place Email: <a href="mailto:helen.martin@cotswold.gov.uk">helen.martin@cotswold.gov.uk</a> Geraldine LeCointe, Assistant Director – Planning Email: <a href="mailto:Geraldine.LeCointe@cotswold.gov.uk">Geraldine.LeCointe@cotswold.gov.uk</a>
Summary/Purpose	To seek the Council's endorsement of the findings of the PAS (Planning Advisory Service) Planning Service Peer Challenge report (May 2025) and the proposed Action Plan.
Annexes	PAS Planning Services Peer Challenge report CDC Action Plan
Recommendation(s)	That Cabinet resolves to: <ol style="list-style-type: none"> <li>1. Endorse the PAS Planning Service Peer Challenge Report (May 2025) and its recommendations, and to endorse the resultant Action Plan for implementation.</li> <li>2. Agree to publish the report and the accompanying Action Plan on the CDC Planning and Building web pages.</li> </ol>



Corporate priorities	<ul style="list-style-type: none"><li>• Provide socially rented homes</li><li>• Make our local plan green to the core</li><li>• Support health and wellbeing</li><li>• Enable a vibrant economy</li></ul>
Key Decision	No
Exempt	No
Consultees/ Consultation	The PAS Planning Service Peer Review involved extensive consultation with a broad range of stakeholders, internal and external.

## **1. EXECUTIVE SUMMARY**

- 1.1 The PAS Planning Service Peer Challenge report summarises the findings of the Planning Peer Challenge (PPC) that took place over three days on 25<sup>th</sup> to 27<sup>th</sup> March 2025. This followed a corporate Peer challenge conducted in October 2022, and a progress review completed November 2024.
- 1.2 The purpose of the PPC was to conduct a more focused review of the Planning Service to gain insights on the significant strengths of the service as well as to identify potential areas for improvement.

## **2. BACKGROUND**

- 2.1 The aim of the PCC was to help the service play a leading role in the delivery of CDC's corporate aims to create a Council that is proactive and responsive to the needs of its residents and businesses in a fast-changing environment and to build for the future whilst respecting its heritage. The Peer challenge sought to identify where ambitions can be stretched and where improvements need to be made so that planning is at the forefront of practise in shaping the future of the Cotswolds.
- 2.2 The team, composed of experienced elected members and officer Peers, feedback against four themes: -
  - Vision and leadership
  - Performance and management
  - Engagement (partners and the community); and
  - Achieving outcomes.
- 2.3 Peer challenges are improvement focused; they are not an inspection.
- 2.4 The Peer Team reviewed a range of documents and information to ensure that they were familiar with the Council and the challenges it is facing. During the three days the team spent on site they gathered information and views from more than 29 meetings and spoke to more than 75 people including a range of Council staff, elected members and external stakeholders.

### 3. MAIN POINTS

The full report is attached as a background paper, and the key recommendations have been extracted and are included in the table below.

1	<p><b>Enhance internal communication and understanding</b></p> <p>To foster a clearer understanding of the Council's vision and corporate priorities, the Council should implement regular internal communication sessions, workshops, and training focused on the Corporate Plan and its alignment with the planning service. These sessions can help staff members understand their roles and how they contribute to the overarching goals of the Council.</p>
2	<p><b>Provide for the planning service to have an active involvement in the Corporate Plan refresh</b></p> <p>As the Corporate Plan is set to be refreshed, the Council must ensure that the planning service is actively involved in this process. Establish a cross-departmental working group that includes planners, managers, and political leaders to encourage collaboration and ensure that planning insights are integrated into corporate objectives. This collaborative approach will create a shared sense of ownership and responsibility for achieving the Council's ambitions.</p>
3	<p><b>Conduct an options appraisal to inform the development of the Local Plan</b></p> <p>Initiate a thorough options appraisal focused on developing an up-to-date comprehensive Local Plan. Engage with PAS for support in conducting this appraisal to assess the implications of various approaches and identify potential risks associated with local plan development.</p> <p>Following the options appraisal, we recommend commencing the development of a cohesive Local Plan that specifically addresses identified challenges, including the increase in local housing needs. Establish a strategic timeline to prioritise this initiative, ensuring that adequate resources and staffing are allocated throughout the process.</p>
4	<p><b>Implement robust project management and governance frameworks</b></p> <p>Establish a comprehensive project management and governance structure to oversee the Local Plan development process. This should provide strategic oversight,</p>

	<p>secure necessary resources, and ensure accountability including a clear decision-making framework with defined roles for senior leadership, elected members, and key stakeholders.</p> <p>Adopt project management practices to oversee the local plan development process. This includes using project timelines, milestones, and regular progress reviews to ensure that the development of the local plan remains on schedule. Create transparency in the progress of the local plan to mitigate any uncertainties or misalignment within the Council and among stakeholders.</p>
5	<p><b>Review and revise staff terms and conditions</b></p> <p>To enhance the stability and effectiveness of the planning service it is important the Council undertakes or commissions a comprehensive review of team structures, staff terms and conditions. Addressing recruitment challenges and clarifying career progression opportunities are essential for retaining talent and fostering team cohesion. The Council should ensure parity within teams and consider re-evaluating existing terms of employment to align them with those of other local authorities, especially for staff who have transitioned from Publica. Establishing clear and transparent career advancement pathways will not only improve morale but also empower staff to see a future within the organisation, reducing turnover and the associated pressures on the team.</p>
6	<p><b>Enhance formal collaboration among teams and establish service level agreements</b></p> <p>The planning service can benefit from increased formal collaboration to complement the positive existing informal relationships. While the informal dynamic is valuable, it can be inconsistent and reliant on individual initiative. It can also lead to perceptions of siloed working when in fact communication channels are open, albeit informally. A structured approach will not only improve service delivery efficiency but also ensure that teams are effectively coordinated, reducing confusion regarding task ownership and response times.</p>
7	<p><b>Prepare to reduce the use of Extensions-of-Time (EoTs)</b></p> <p>Prepare to reduce reliance on extensions of time for planning applications in anticipation of stricter government targets while maintaining constructive and transparent applicant dialogue.</p>

8	<p><b>Review and improve the Planning Performance Agreement (PPA) process</b></p> <p>Ensure consistency, reliability, and clear value for stakeholders using Planning Performance Agreements (PPAs) and structured pre-application processes. This approach will ensure early alignment on design principles and policy compliance, reducing delays and limiting post-submission negotiations. To further encourage engagement, the Council should consider making no allowance of Extensions of Time (EoTs) for applications submitted without prior pre-application consultation or a PPA and minimal tolerance for redesigns on sub-optimal schemes.</p>
9	<p><b>Strengthen Planning Enforcement resources</b></p> <p>Address resource issues to help reduce the backlog of cases and enhance response times. This investment will enable the team to focus on proactive enforcement efforts and explore innovative solutions. Creating a structured forum for staff to share insights and recommendations will foster collaboration and empowerment.</p>
10	<p><b>Maximise digital capabilities and embrace technological innovation</b></p> <p>Implement a comprehensive digital strategy that seeks to optimise the use of existing software investments (IDOX, CRM, and Uniform) while embracing emerging technologies. This should include a full audit of current systems to identify underutilised features, implementation of standardised protocols for data entry and management, and staff training to ensure maximum system utilisation.</p> <p>Actively engage with digital planning initiatives to modernise the planning services. This includes capitalising on learnings from recent funding and initiatives, such as those awarded by the PropTech Engagement Fund, to explore AI-powered solutions for handling routine enquiries, automating standard correspondence, and intelligent document processing.</p>
11	<p><b>Develop a comprehensive stakeholder engagement plan</b></p> <p>Create a structured stakeholder engagement plan that ensures meaningful participation from all key partners, including elected members. This should align with the current Statement of Community Involvement (SCI) and establish clear communication channels, roles, and responsibilities.</p>

	<p>A key component should be the establishment of a regular Developers Forum, bringing together major developers, agents, and Council representatives to discuss emerging issues, share updates, and maintain constructive dialogue.</p> <p>Additionally, the Council could organise regular partnership forums across Gloucestershire, involving both officers and members, to share best practices and promote innovative discussions. This collaborative approach will help build stronger relationships, identify shared priorities, and facilitate effective problem-solving.</p>
12	<p><b>Develop a comprehensive service plan with robust performance monitoring</b></p> <p>Create a comprehensive service plan that clearly outlines priorities, timelines, and resource needs, underpinned by specific, measurable performance targets that are regularly monitored and reported to senior management on a quarterly basis.</p> <p>Key Performance Indicators (KPIs) should extend beyond statutory processing times to include metrics on pre-application engagement, plan-making milestones, and service improvement initiatives. The plan should detail the acceleration of the Local Plan's progression while enhancing stakeholder engagement, with clear accountability for delivery at all levels. It may also be helpful to develop a more detailed service plan for each core area of the planning service where appropriate.</p> <p>A thorough resource planning assessment should ensure teams are appropriately staffed and aligned with key objectives, with regular performance reviews enabling senior management to make informed decisions about resource allocation and service improvement priorities.</p>
13	<p><b>Enhance financial transparency and accountability</b></p> <p>To improve budget management and accountability, the Council should provide managers with detailed insights into the financial position of their services. This transparency will enable them to make informed decisions regarding income generation and resource allocation that align with the Council's strategic objectives. Furthermore, establishing a framework for assessing income generation opportunities across departments can help identify potential savings and efficiencies. Linked to recommendation 11, partnership working with authorities across Gloucestershire may also support innovation and best practice in this area.</p>

The context for these recommendations is set out below under the key four themes.

### **3.1 Vision and Leadership**

- The Peer Team acknowledge the Chief Executive has articulated a clear vision for the future of CDC and it is evident that both the political and managerial leadership are dedicated to fostering the right conditions for staff to thrive. The emerging People Strategy will establish a set of values and behaviours which is particularly important as CDC continues to grow and further services transition back to the Council. The Corporate Plan provides direction through its objectives and principles.
- However, this commitment to the culture is not always fully understood by the staff themselves. Officers are generally aware of the Corporate Plan but a noticeable disconnect exists between the Planning Service and its role in supporting the delivery of specific corporate priorities. This can create uncertainty and misalignment, ultimately limiting opportunities for effective collaboration. The involvement of the Planning Service in the refresh of the Corporate Plan presents an important opportunity to address these issues.
- The Peer Team noted a lack of senior managerial and political leadership in the development of a comprehensive and up-to-date local plan. The plan is crucial for articulating the spatial interpretation of CDC's corporate priorities and establishing the development framework that guides decisions made by the Planning Service and Council. Without a robust and up-to-date local plan, there is a risk that efforts to align the Planning Service with corporate objectives may falter.

### **3.2 Performance and Management.**

- The transition of most of the Planning Service into the Council in November 2024 along with the permanent recruitment of the Director of Communities & Place and the Assistant Director of Planning Services are positive developments that have contributed to increased stability.
- The team exhibit high morale, a spirit of mutual support, and a strong commitment to achieving positive outcomes. There have been recruitment challenges, due in part to terms and conditions, partly due to limited career



development opportunities and non-competitive terms compared to other Councils. This has led to high turnover, stress and increased pressure within the team. There is an opportunity to re-evaluate staff terms and conditions whilst enhancing career progression pathways. This is vital to foster team cohesion and to retain valuable talent.

- The Planning Policy Team manage a wide range projects which affects their ability to focus on core tasks such as the development of the local plan. It is essential the Council addressed the resource constraints and capacity issues if it intends to act on one of the fundamental recommendations of the report - to proceed without delay on developing a comprehensive and up-to-date local plan.
- The Development Management (DM) service is performing well against the government's national performance indicators for speed of processing planning applications. This is a significant improvement following the joint DM review in 2022 and the potential risk of designation. However, the service currently relies heavily on extensions of time (EOTs). This reliance is unsustainable and must be reduced.
- Staffing challenges within Planning Enforcement must be addressed to effectively support the work of the Local Enforcement Plan. The report recommends the Council prioritises the recruitment and allocation of additional resource within the Enforcement Team to reduce the backlog of cases and provide staff with the capacity to explore and implement ideas for improvement.
- It is recommended that CDC actively engages in Government initiatives relating to digital planning and adopts best practice and innovation to support an efficient Planning Service.
- Performance management lacks consistency, and appraisal processes are unclear along with their connection to the broader corporate performance management framework. Defining specific key performance indicators that align with corporate objectives and emerging People Strategy is vital. Creating an environment which encourages staff engagement is crucial alongside a structured performance management system.

### **3.3 Engagement**

- The Peer Team was impressed with the wider corporate approach to partnership working. The team met with some well-informed community

groups who had a good understanding of the planning process. However, there is evident confusion among stakeholders regarding the local plan which is complicated relationships and engagement efforts for communities, Parish and Town Councils, and developers.

- The Council should establish a structured and well publicised engagement programme with Parish and Town Councils.
- A regular Developer's Forum bringing together major developers, agents, and CDC representatives to facilitate constructive dialogue on emerging issues and maintain open channels of communication is recommended.

### **3.4 Achieving Outcomes**

- The Planning Service demonstrates a strong commitment to the overarching principle of "green to the core".
- The service has successfully secured grant income to support critical projects such as local plan progression and Greenbelt review.
- The recent senior management appointments focused on community and place shows a clear ambition to advance and cultivate sustainable growth within CDC.
- Clarity regarding the local plan and the future development framework for the area is essential to mitigate the risk of unplanned developments
- Budget management is a critical area that requires attention. Managers need to effectively consider income generation opportunities and savings.
- To drive these initiatives forward, the Council and service should develop a comprehensive Service Plan that outlines clear priorities and timelines.
- Accelerating the local plan progression whilst engaging both internally and externally with stakeholders is vital for achieving successful outcomes.

### **3.5 Implementation and Next Steps**

- 3.6 To support openness and transparency PAS recommends that the Council shares the report with officers and that it is published for information for wider stakeholders.
- 3.7 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. An initial action plan is included in the background papers. This is a live document that will be used as an ongoing improvement plan and updated as required.
- 3.8 The plan sets out activity underway, or proposed, against each of the 13 recommendations. Some of the recommendations and proposed actions will require investment. These will be subject to business cases and further approval processes once the preferred option and full costs are known.
- 3.9 Progress against the plan (and any updates) will be reported to the Cabinet Member on a quarterly basis, and on an annual basis to the Planning Committee.

#### **4. ALTERNATIVE OPTIONS**

- 4.1 The alternative option is not to endorse the Peer Challenge Plan and Action Plan.

#### **5 FINANCIAL IMPLICATIONS**

- 5.1 The Planning Advisory Service Peer Review report makes a number of recommendations to ensure the Planning Service is able to support delivery of the Council's priorities and Corporate Plan.
- 5.2 Recommendations and actions that focus on improving the way in which the service operates will need to be supported by a business plan outlining the resources required, delivery timescale, and outlining the cashable and non-cashable benefits. Specifically, the plan will need to identify those actions that can be delivered within existing resources and those that may require additional funding (whether one-off or ongoing).
- 5.3 IT and process improvements that may require additional system enhancements will need to consider the investment required and payback period.
- 5.4 Recommendations 5 and 13 will need to be feed into wider reviews of both staff terms and conditions and enhancements to the financial reporting framework to ensure the Planning Service actions are considered and included in any Council-wide programme.

- 5.5 Cabinet will consider proposals on the Local Plan under Agenda Item 14. This is a significant undertaking for the Council and will need to be planned, managed, and adequately resourced to ensure key milestones are achieved and the Local Plan can be finalised prior to submission in 2026 and adoption by the end of 2027.
- 5.6 The balance on the Local Plan Reserve (as at 31 March 2025) is £1.005m. Whilst it is anticipated the Local Plan Reserve is sufficient to finalise the Local Plan based on the Project Plan (which sets out the evidence base and staffing resource required) it would be prudent at the stage to ensure adequate contingency funding is identified and held in the event that elements of the delivery plan require further support to ensure the wider project remains on target.
- 5.7 Whilst it is outside the scope of this report to allocate additional contingency funding, given the importance of the Local Plan to the Council's aims and priorities/Corporate Plan, a review and reprioritisation of the review of Council's Earmarked Reserves will be undertaken as part of the Balances and Reserves Strategy supporting the 2026/27 Budget and Medium-Term Financial Strategy. This will help mitigate any additional pressures on the Council Revenue budget arising from the preparation of the Local Plan.

## **6 LEGAL IMPLICATIONS**

- 6.1 Regular peer reviews are good practice across local government and good governance requires the Council to consider and – where relevant - to take up and implement the conclusions reached by the reviewing team. Following the recommendations of this review, considering the change of circumstances, will evidence good governance and prepare the team for the upcoming Local Government Re-organisation.
- 6.2 Some of the employees within Planning Services were transferred from the employment of Publica to CDC as part of Phase 1 transition of services. This was a "relevant transfer" for the purposes of the Transfer of Undertakings (Protection of Employment) Regulations 2002 (as amended) and as such these employees transferred to CDC under their existing terms and conditions. It was accepted in the measures letter that CDC may need in the future to carry out organisational reviews to ensure structures remain suitable to meet ongoing and future business needs. In the event this is deemed necessary employees would be informed and consulted along with recognised trade unions accordingly.

## **7 RISK ASSESSMENT**

- 7.1 No risks identified arising directly from the PAS report. There are risks associated with non-implementation of some of the proposed actions, for example not progressing with a comprehensive and up to date local plan. This issue is covered in more detail in the Local Plan report on the same cabinet agenda (Agenda item 14).

## **8 EQUALITIES IMPACT**

- 8.1 No issues identified.

## **9 CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

- 9.1 None.

## **10 BACKGROUND PAPERS**

- 10.1 LGA Corporate Peer Review – progress report November 2024.  
10.2 Planning Service Peer Challenge Final Report May 2025  
10.3 CDC Action Plan

(END)

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		monthly Directorate meetings.			
2	<p><b>Provide for the planning service to have an active involvement in the Corporate Plan refresh</b></p> <p>As the Corporate Plan is set to be refreshed, the council must ensure that the planning service is actively involved in this process. Establish a cross-departmental working group that includes planners, managers, and political leaders to encourage collaboration and ensure that planning insights are integrated into corporate objectives. This collaborative approach will create a shared sense of ownership and responsibility for achieving the council's ambitions.</p>	<p>Share draft at C&amp;P Directorate meetings.</p> <p>Thread of Corporate Plan to run through service plans, individual appraisals and one to ones.</p>	<p>June 2025 and monthly thereafter.</p> <p>Preparation started in June 2025 but awaiting corporate update in Autumn 2025</p>	Late Oct 2025	





	adequate resources and staffing are allocated throughout the process.				
4	<p><b>Implement robust project management and governance frameworks</b></p> <p>Establish a comprehensive project management and governance structure to oversee the Local Plan development process. This should provide strategic oversight, secure necessary resources, and ensure accountability including a clear decision-making framework with defined roles for senior leadership, elected members, and key stakeholders.</p> <p>Adopt project management practices to oversee the local plan development process.</p>	<p>Seek Cabinet endorsement of a single Local Plan</p> <p>Review of Local Plan project plan and governance arrangements including: -</p> <ul style="list-style-type: none"> <li>• identification of project sponsor, senior responsible officer, and project lead,</li> <li>• process mapping of boards, steering groups and approval routes (membership, ToR and frequency),</li> <li>• Creation of admin support.</li> <li>• review of constitution and onward delegations.</li> <li>• Development of engagement and communications plan (internal and external).</li> </ul>	<p>Summer 2025</p> <p>New oversight board to be created July 2025</p>	<p>Autumn 2025</p> <p>Board to oversee the whole local plan project to December 2026</p>	

	<p>This includes using project timelines, milestones, and regular progress reviews to ensure that the development of the local plan remains on schedule. Create transparency in the progress of the local plan to mitigate any uncertainties or misalignment within the council and among stakeholders.</p>	<ul style="list-style-type: none"> <li>• Identification of synergies and impacts with or on other service areas.</li> <li>• Realignment of resource and reprioritisation of activity.</li> </ul>			
5	<p><b>Review and revise staff terms and conditions</b></p> <p>To enhance the stability and effectiveness of the planning service it is important the council undertakes or commissions a comprehensive review of team structures, staff terms and conditions. Addressing recruitment challenges and clarifying career progression</p>	<p>Mapping of comparable roles and grades across service.</p> <p>Ensure all Job descriptions and Person Specifications are up to date and accurate.</p> <p>Benchmarking with neighbouring authorities on structure and gradings.</p> <p>Develop a proposed new structure to ensure operational resilience and sustainability and succession planning. To include provision of admin support.</p>	<p>July 2025</p> <p>July 2025</p> <p>Spring 2025</p> <p>Summer 2025</p>	<p>Autumn 2025</p> <p>December 2025</p> <p>Winter 2025</p> <p>Spring/Summer 2026</p>	

	<p>opportunities are essential for retaining talent and fostering team cohesion. The council should ensure parity within teams and consider re-evaluating existing terms of employment to align them with those of other local authorities, especially for staff who have transitioned from Publica. Establishing clear and transparent career advancement pathways will not only improve morale but also empower staff to see a future within the organisation, reducing turnover and the associated pressures on the team.</p>	<p>Assessment of grading and consideration of measures to address any discrepancies including for example, the use of market supplements, constancy of spot points versus grade bandings and the career grading of posts.</p> <p>Costing of new structure (amend/realign to fit financial envelope or seek growth).</p>	<p>Linked to corporate actions Summer/ Autumn 2025</p> <p>Winter 2025</p>	<p>Spring 2026</p> <p>Spring 2026</p>	TBC
6	<p><b>Enhance formal collaboration among teams and establish service level agreements</b></p> <p>The planning service can benefit from increased formal</p>	<p>Stakeholder mapping to identify those partnerships where a Service Level Agreement (SLA) would be beneficial. (some of these will be internal)</p>	Summer 2025	Autumn/Winter 2025	

	<p>collaboration to complement the positive existing informal relationships. While the informal dynamic is valuable, it can be inconsistent and reliant on individual initiative. It can also lead to perceptions of siloed working when in fact communication channels are open, albeit informally. A structured approach will not only improve service delivery efficiency but also ensure that teams are effectively coordinated, reducing confusion regarding task ownership and response times.</p>	<p>Draft SLA for each setting out expectations (of both parties), agreeing process for performance management, amendment and review.</p> <p>Approval of each SLA and communication of roles and expectations and training for parties involved.</p> <p>Agreed actions fed into Service Plans.</p> <p>Monitoring of response times for key stakeholders and performance management.</p> <p>Communicate with key stakeholder's local plan timetable and peaks of activity affecting key partners.</p>	<p>Winter 2025</p> <p>Winter 2025</p> <p>Autumn 2025</p>	<p>Spring 2026</p> <p>Spring 2026</p> <p>Amend existing service plans Spring 2026, feed into new for 2026/27.</p> <p>Spring 2026 and at agreed intervals thereafter.</p> <p>Autumn/Winter 2025</p>	
7	<p><b>Prepare to reduce the use of Extensions-of-Time (EoTs)</b></p> <p>Prepare to reduce reliance on extensions of time for planning applications in anticipation of</p>	<p>Review options for improved performance management data and reporting (i.e. Enterprise and Power BI).</p> <p>Developing reporting protocols.</p> <p>Process mapping of DM: -</p>	<p>Summer Autumn 2025</p> <p>Summer/Autumn 2025</p> <p>Summer/Autumn 2025</p>	<p>Summer/Autumn 2026</p> <p>Winter 2025</p> <p>Autumn 2026</p>	TBC - licence and software costs.

	<p>stricter government targets while maintaining constructive and transparent applicant dialogue.</p>	<ul style="list-style-type: none"> <li>• maximise use of ICT systems for automation and workflow,</li> <li>• Amend validation checklist and consultation protocols to reduce workloads and allow officers to focus on value add/increasing processing time.</li> <li>• Work with consultees and stakeholders on SLA to improve response times.</li> <li>• Work with legal on capacity and options to outsource during peaks.</li> <li>• Use of PPAs for majors.</li> <li>• Agree updated protocols for early refusals if no pre application discussions and one option to amend before determining.</li> <li>• Create admin role to support.</li> <li>• Pre application advice process improvements</li> </ul>			
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		<ul style="list-style-type: none"> <li>Improve web pages and advice/signposting to allow customers to self-serve where possible.</li> </ul>			
8	<b>Review and improve the Planning Performance Agreement (PPA) process</b> Ensure consistency, reliability, and clear value for stakeholders using Planning Performance Agreements (PPAs) and structured pre-application processes. This approach will ensure early alignment on design principles and policy compliance, reducing delays and limiting post-submission negotiations. To further encourage engagement, the council should consider making no allowance of Extensions of Time (EoTs) for	PPA training session being set up.  Agree standard templates and protocol setting out requirements and expectations of all parties.  As above agree protocols for early refusals if no pre application discussions and one option to amend before determining.  Annual review of fees and charges	Summer 2025  Autumn 2025  Autumn 2025  Autumn/winter 2025 and annual thereafter	Autumn/Winter 2025  April 2026	

	applications submitted without prior pre-application consultation or a PPA and minimal tolerance for redesigns on sub-optimal schemes.				
9	<b>Strengthen Planning Enforcement resources</b> Address resource issues to help reduce the backlog of cases and enhance response times. This investment will enable the team to focus on proactive enforcement efforts and explore innovative solutions. Creating a structured forum for staff to share insights and recommendations will foster collaboration and empowerment.	Agency contracts for temporary staff extended for 6 months  Internal promotion from Assistant to Officer following unsuccessful external recruitment.  Review DM and Enforcement structure and options for long term sustainability of the team including provision of admin support.  Review and update the Local Enforcement Plan.  Complaints analysis (by type and proportion of no breach complaints).  Agree a plan for the clearance of backlog including triage of cases, closing extant historic cases over an agreed age (TBD)	May 2025  May 2025  Autumn/Winter 2025  Summer 2025  Summer/Autumn 2025  Summer/Autumn 2025	Spring/Summer 2026  Winter25/Spring 26  Winter25/Spring 26  Winter 25/Spring 26	



		<p>where there has been no recent action or complaint. Prioritisation of new cases.</p> <p>Process mapping of enforcement and maximise use of ICT systems for automation and workflow.</p> <p>Training for officers and members</p>	Winter 2025	Summer 2026	
10	<p><b>Maximise digital capabilities and embrace technological innovation</b></p> <p>Implement a comprehensive digital strategy that seeks to optimise the use of existing software investments (IDOX, CRM, and Uniform) while embracing emerging technologies. This should include a full audit of current systems to identify underutilised features, implementation of standardised protocols for data</p>	<p>Process mapping and audit to ascertain where existing technology could be better utilised.</p> <p>Introduce new software to support local plan process - Consultation software which uses AI to reduce time consider consultation responses.</p> <p>Explore the use of Enterprise and Power BI/Idox Insights to support improved performance reporting and management. Implement preferred option.</p> <p>Review Digital Improvement Fund and PropTech.</p>	<p>Winter25/Spring 26 and beyond.</p> <p>Autumn 2025</p> <p>Summer/Autumn 2025</p> <p>Winter 2025</p>	<p>Continuous process</p> <p>Spring/Summer 2026</p> <p>Winter 2026</p>	

	<p>entry and management, and staff training to ensure maximum system utilisation.</p> <p>Actively engage with digital planning initiatives to modernise the planning services. This includes capitalising on learnings from recent funding and initiatives, such as those awarded by the PropTech Engagement Fund, to explore AI-powered solutions for handling routine enquiries, automating standard correspondence, and intelligent document processing.</p>	<p>Explore hiring a dedicated GIS officer – to support a channel shift to self-serve.</p> <p>Explore/create a Technical Support role within the service as part of the restructure review.</p>	<p>Winter 25/Spring 26</p> <p>Winter 25/Spring 26</p>		
11	<p><b>Develop a comprehensive stakeholder engagement plan</b></p> <p>Create a structured stakeholder engagement plan that ensures meaningful</p>	<p>Stakeholder mapping to identify key partnerships and organisations, aligned with the SCI.</p> <p>Mapping of existing forums and touchpoints.</p>	<p>Autumn/Winter 2025</p> <p>Autumn/Winter 2025</p>	<p>Spring 2026</p> <p>Winter 2025</p>	

<p>participation from all key partners, including elected members. This should align with the current Statement of Community Involvement (SCI) and establish clear communication channels, roles, and responsibilities.</p> <p>A key component should be the establishment of a regular Developers Forum, bringing together major developers, agents, and council representatives to discuss emerging issues, share updates, and maintain constructive dialogue.</p> <p>Additionally, the council could organise regular partnership forums across Gloucestershire, involving both officers</p>	<p>Review and amendment of web content (intranet and internet).</p> <p>Seek feedback from partners of how they want to be engaged with and development communications strategy with communications team. This may include the establishment of forums (virtual or actual).</p>	<p>Winter 2025</p> <p>Winter 2025</p>	<p>Spring/Summer 2026</p> <p>Spring/Summer 2026</p>	
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	and members, to share best practices and promote innovative discussions. This collaborative approach will help build stronger relationships, identify shared priorities, and facilitate effective problem-solving.				
12	<p><b>Develop a comprehensive service plan with robust performance monitoring</b></p> <p>Create a comprehensive service plan that clearly outlines priorities, timelines, and resource needs, underpinned by specific, measurable performance targets that are regularly monitored and reported to senior management on a quarterly basis.</p> <p>Key Performance Indicators (KPIs)</p>	<p>Draft Planning Services Service Plan with agreed KPIs to be communicated to and cascade via teams and individual agreed actions and targets. Monitored via one to ones and annual appraisals.</p> <p>Explore the use of Enterprise and PowerBi/Idox Insights to support improved performance reporting and management. Implement preferred option.</p> <p>Review DM and Enforcement structure and options for long term sustainability of the team including provision of admin support.</p>	<p>June 2025</p> <p>Summer 2025</p> <p>Autumn/Winter 2025</p>		TBC

	<p>should extend beyond statutory processing times to include metrics on pre-application engagement, plan-making milestones, and service improvement initiatives. The plan should detail the acceleration of the Local Plan's progression while enhancing stakeholder engagement, with clear accountability for delivery at all levels. It may also be helpful to develop a more detailed service plan for each core area of the planning service where appropriate.</p> <p>A thorough resource planning assessment should ensure teams are appropriately staffed and aligned with key objectives, with regular performance reviews</p>				
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	enabling senior management to make informed decisions about resource allocation and service improvement priorities.				
13	<p><b>Enhance financial transparency and accountability</b></p> <p>To improve budget management and accountability, the council should provide managers with detailed insights into the financial position of their services. This transparency will enable them to make informed decisions regarding income generation and resource allocation that align with the council's strategic objectives. Furthermore, establishing a framework for assessing income generation opportunities across</p>	<p>Review of budget reports on ABW (finance system) and amend to reflect: -</p> <ul style="list-style-type: none"> <li>• new budget areas post transition, (including reports on funds/grants held in reserves)</li> <li>• to allow real time reporting on approved budget, spend to date, commitments.</li> <li>• to allow budget holders to monitor and assess actual and projected spend, the profile of spend across the year and the management of budgets to ensure on budget or underspent at year end.</li> </ul> <p>Agree new reporting process including: -</p>	<p>Reliant on colleagues in Finance</p> <p>Winter 2025</p>	<p>.</p> <p>Summer 2026</p>	

<p>departments can help identify potential savings and efficiencies. Linked to recommendation 11, partnership working with authorities across Gloucestershire may also support innovation and best practice in this area.</p>	<ul style="list-style-type: none"> <li>• Clearly identified and responsible budget holders.</li> <li>• Budget training for all budget holders on roles, responsibilities, expectations and systems.</li> <li>• Monthly one to one meeting between budget holders and finance</li> <li>• Monthly C&amp;P Management meetings with finance attendance for reporting by exception.</li> <li>• Where feasible realignment of Directorate resource to areas of need/pressure.</li> <li>• Review of existing fees and charges.</li> <li>• Consideration of new charges – for example for providing local plan advice and increasing the use of PPAs.</li> </ul>	<p>Autumn 2025</p> <p>Summer 2025</p>	<p>Spring 2026</p> <p>April 2026</p>	
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# Planning Service Peer Challenge

## Cotswold District Council

25<sup>th</sup> – 27<sup>th</sup> March 2025

Final Report 20 May 2025

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## 1. Executive summary

- 1.1 This report summarises the findings of a planning peer challenge (PPC) of Cotswold District Council (CDC) planning service that took place over three days on 25 to 27 March 2025. The PPC was organised at the request of CDC by the Local Government Association (LGA) with the Planning Advisory Service (PAS) and undertaken on site by a team of councillor and officer peers.
- 1.2 The PPC follows a corporate peer challenge of CDC, conducted in October 2022, and a progress review completed in November 2024. The latter review noted that the council had effectively embraced the recommendations from the corporate peer challenge, leading to important change and improvement. The purpose of the PPC was to conduct a more focused review of the planning service to gain insights on the significant strengths in the service as well as identify potential areas for improvement.
- 1.3 A notable achievement has been the transfer of most of the planning service back to the council from Publica<sup>1</sup>, which has instilled a greater sense of stability among the staff who returned. The planning service is an enthusiastic, dedicated, and professional team who are clearly proud to work for CDC. We observed significant improvements in Development Management performance since a separate review was conducted in 2022, and we recognise the successful delivery of several objectives of the 2018 Local Plan. This includes consistently meeting housing delivery test targets, a national measure that assesses whether planned housing requirements have been met within a defined timeframe.
- 1.4 The permanent recruitment of the Director of Place and Communities and Assistant Director of Planning Services is a positive development that will contribute to greater stability for staff, particularly after an extended period of interim management. This should not diminish the significant progress the service has made under the guidance of recent interim leaders. With a permanent senior leadership team in place, the service is well-positioned to build on these achievements and establish a robust foundation for becoming the planning service that the council aspires to deliver.
- 1.5 We identified several areas for improvement that we recommend should be addressed. Most notably, there appears to be a disconnect between the planning service and broader corporate priorities, which can create confusion due to a lack of alignment in goals and changing priorities. At times, the service encounters internal reputational challenges stemming from perceived isolated working practices, which can obscure its vital role as an enabler of corporate projects. It is essential to cultivate a shared understanding of how the planning service can help facilitate the achievement of key corporate objectives while ensuring that its regulatory functions are not compromised. This includes implementing regular internal communication sessions, workshops, and active involvement of the planning service in the Corporate Plan refresh. There is a recognition, both corporately and within the planning service, that proactive place-shaping is fundamental to maintaining CDC as a desirable and sustainable area for residents, businesses, and visitors alike. Therefore, it is crucial to align these ambitions wherever possible.
- 1.6 Additionally, both internal and external stakeholders have expressed concerns regarding the progress of developing an up-to-date Local Plan. This delay poses risks not only to the delivery of key corporate objectives but also to the planning service itself, as not having an up-to-date Local Plan can lead to unplanned development. The council faces several important challenges that require a strategic focus and for which the local plan is an important delivery tool. These include an increase housing need in nationally mandated figures and the exploration of growth options for residential and economic development, all within the context of ongoing national changes to the planning system. An up-to-date Local

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<sup>1</sup> Publica is a not-for-profit Teckal company owned by Cotswold, Forest of Dean, and West Oxfordshire District Councils and Cheltenham Borough Council.

Plan is essential for establishing the spatial framework for the area, ensuring development occurs in appropriate locations. Consequently, it is critical for the council to prioritise options that facilitate the creation of a comprehensive and up-to-date Local Plan without delay. Conducting an options appraisal and implementing robust project management and governance frameworks will be essential to this process.

- 1.7 With local government reorganisation on the horizon, it is essential for the council to remain proactive in its efforts to develop an up-to-date Local Plan. The council can use the local plan to effectively guide the transition and supporting long-term growth during this period of change. It is crucial to ensure that local communities in the area and developers who use the service continue to receive the best possible support from CDC, regardless of any changes to administrative boundaries. Success will depend on strengthened engagement on the development of the Local Plan from both officers and members of the senior leadership team. This includes the development of a comprehensive stakeholder engagement plan and the creation of a Developer's Forum to foster regular dialogue with key partners.
- 1.8 We heard that the transition from Publica back to the council has posed challenges for officers in accessing career progression opportunities. It remains unclear whether this stems from the terms and conditions inherited during the transition, but it is causing significant concern among staff. There is a risk that officers will leave CDC to pursue career advancement opportunities in other councils. This would represent a loss for CDC, as it is evident that the affected employees take pride in their roles and wish to remain with the organisation. We recommend a review of staff terms and conditions to address recruitment and retention challenges. Additionally, there is a lack of evidence indicating that a robust performance management process is in place for all individuals and teams. Strengthening performance management and enhancing career progression opportunities are essential for fostering team cohesion and retention.
- 1.9 Enhancing financial transparency and accountability can further support effective budget management and resource allocation aligned with strategic objectives. By providing managers with detailed insights into the financial position of their services, CDC can better align income generation and resource allocation with strategic objectives. Furthermore, establishing a framework for assessing income generation opportunities across departments can help identify potential savings and efficiencies, fostering innovation and best practice.
- 1.10 In summary, the transition of the planning service back to the council from Publica has provided CDC with a strong foundation and a dedicated workforce to realise its vision for an effective planning service. By proactively addressing the identified areas in this report for improvement and effectively navigating the forthcoming challenges, the council can further enhance its planning capabilities for the future. This moment represents a significant and exciting opportunity for the development and growth of the area, and the planning service is essential in shaping and facilitating this progress with the support of officers and members from the senior leadership team. The development of a comprehensive service plan with robust performance monitoring will help in achieving these aims.

## 2. Key recommendations

- 2.1 This section summarises the key / priority recommendations. More detail on each one can be found in the main body of the report. It is important that the planning service integrates these recommendations into its own action plan or business service plan and is clear about 'what success looks like'. This will help to ensure that the recommendations in this report are in context and are aligned to a clear set of outcomes and measures.

1	<b>Enhance internal communication and understanding</b> To foster a clearer understanding of the council's vision and corporate priorities, the council should implement regular internal communication sessions, workshops, and
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	training focused on the Corporate Plan and its alignment with the planning service. These sessions can help staff members understand their roles and how they contribute to the overarching goals of the council.
2	<p><b>Provide for the planning service to have an active involvement in the Corporate Plan refresh</b></p> <p>As the Corporate Plan is set to be refreshed, the council must ensure that the planning service is actively involved in this process. Establish a cross-departmental working group that includes planners, managers, and political leaders to encourage collaboration and ensure that planning insights are integrated into corporate objectives. This collaborative approach will create a shared sense of ownership and responsibility for achieving the council's ambitions.</p>
3	<p><b>Conduct an options appraisal to inform the development of the Local Plan</b></p> <p>Initiate a thorough options appraisal focused on developing an up-to-date comprehensive Local Plan. Engage with PAS for support in conducting this appraisal to assess the implications of various approaches and identify potential risks associated with local plan development.</p> <p>Following the options appraisal, we recommend commencing the development of a cohesive Local Plan that specifically addresses identified challenges, including the increase in local housing needs. Establish a strategic timeline to prioritise this initiative, ensuring that adequate resources and staffing are allocated throughout the process.</p>
4	<p><b>Implement robust project management and governance frameworks</b></p> <p>Establish a comprehensive project management and governance structure to oversee the Local Plan development process. This should provide strategic oversight, secure necessary resources, and ensure accountability including a clear decision-making framework with defined roles for senior leadership, elected members, and key stakeholders.</p> <p>Adopt project management practices to oversee the local plan development process. This includes using project timelines, milestones, and regular progress reviews to ensure that the development of the local plan remains on schedule. Create transparency in the progress of the local plan to mitigate any uncertainties or misalignment within the council and among stakeholders.</p>
5	<p><b>Review and revise staff terms and conditions</b></p> <p>To enhance the stability and effectiveness of the planning service it is important the council undertakes or commissions a comprehensive review of team structures, staff terms and conditions. Addressing recruitment challenges and clarifying career progression opportunities are essential for retaining talent and fostering team cohesion. The council should ensure parity within teams and consider re-evaluating existing terms of employment to align them with those of other local authorities, especially for staff who have transitioned from Publica. Establishing clear and transparent career advancement pathways will not only improve morale but also empower staff to see a future within the organisation, reducing turnover and the associated pressures on the team.</p>
6	<p><b>Enhance formal collaboration among teams and establish service level agreements</b></p> <p>The planning service can benefit from increased formal collaboration to complement the positive existing informal relationships. While the informal dynamic is valuable, it can be inconsistent and reliant on individual initiative. It can also lead to perceptions of siloed working when in fact communication channels are open, albeit informally. A structured approach will not only improve service delivery efficiency but also ensure</p>

	that teams are effectively coordinated, reducing confusion regarding task ownership and response times.
7	<p><b>Prepare to reduce the use of Extensions-of-Time (EoTs)</b></p> <p>Prepare to reduce reliance on extensions of time for planning applications in anticipation of stricter government targets while maintaining constructive and transparent applicant dialogue.</p>
8	<p><b>Review and improve the Planning Performance Agreement (PPA) process</b></p> <p>Ensure consistency, reliability, and clear value for stakeholders using Planning Performance Agreements (PPAs) and structured pre-application processes. This approach will ensure early alignment on design principles and policy compliance, reducing delays and limiting post-submission negotiations. To further encourage engagement, the council should consider making no allowance of Extensions of Time (EoTs) for applications submitted without prior pre-application consultation or a PPA and minimal tolerance for redesigns on sub-optimal schemes.</p>
9	<p><b>Strengthen Planning Enforcement resources</b></p> <p>Address resource issues to help reduce the backlog of cases and enhance response times. This investment will enable the team to focus on proactive enforcement efforts and explore innovative solutions. Creating a structured forum for staff to share insights and recommendations will foster collaboration and empowerment.</p>
10	<p><b>Maximise digital capabilities and embrace technological innovation</b></p> <p>Implement a comprehensive digital strategy that seeks to optimise the use of existing software investments (IDOX, CRM, and Uniform) while embracing emerging technologies. This should include a full audit of current systems to identify underutilised features, implementation of standardised protocols for data entry and management, and staff training to ensure maximum system utilisation.</p> <p>Actively engage with digital planning initiatives to modernise the planning services. This includes capitalising on learnings from recent funding and initiatives, such as those awarded by the PropTech Engagement Fund, to explore AI-powered solutions for handling routine enquiries, automating standard correspondence, and intelligent document processing.</p>
11	<p><b>Develop a comprehensive stakeholder engagement plan</b></p> <p>Create a structured stakeholder engagement plan that ensures meaningful participation from all key partners, including elected members. This should align with the current Statement of Community Involvement (SCI) and establish clear communication channels, roles, and responsibilities.</p> <p>A key component should be the establishment of a regular Developers Forum, bringing together major developers, agents, and council representatives to discuss emerging issues, share updates, and maintain constructive dialogue.</p> <p>Additionally, the council could organise regular partnership forums across Gloucestershire, involving both officers and members, to share best practices and promote innovative discussions. This collaborative approach will help build stronger relationships, identify shared priorities, and facilitate effective problem-solving.</p>
12	<p><b>Develop a comprehensive service plan with robust performance monitoring</b></p> <p>Create a comprehensive service plan that clearly outlines priorities, timelines, and resource needs, underpinned by specific, measurable performance targets that are regularly monitored and reported to senior management on a quarterly basis.</p>

	<p>Key Performance Indicators (KPIs) should extend beyond statutory processing times to include metrics on pre-application engagement, plan-making milestones, and service improvement initiatives. The plan should detail the acceleration of the Local Plan's progression while enhancing stakeholder engagement, with clear accountability for delivery at all levels. It may also be helpful to develop a more detailed service plan for each core area of the planning service where appropriate.</p> <p>A thorough resource planning assessment should ensure teams are appropriately staffed and aligned with key objectives, with regular performance reviews enabling senior management to make informed decisions about resource allocation and service improvement priorities.</p>
13	<p><b>Enhance financial transparency and accountability</b></p> <p>To improve budget management and accountability, the council should provide managers with detailed insights into the financial position of their services. This transparency will enable them to make informed decisions regarding income generation and resource allocation that align with the council's strategic objectives. Furthermore, establishing a framework for assessing income generation opportunities across departments can help identify potential savings and efficiencies. Linked to recommendation 11, partnership working with authorities across Gloucestershire may also support innovation and best practice in this area.</p>

### 3. Summary of the peer challenge approach

#### 3.1 The peer team

3.1.1 Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected the focus of the peer challenge and peers were selected on the basis of their relevant expertise. The peers were:

- **Councillor Paula Widdowson**, Executive Member for Environment and Climate Change at City of York Council
- **David Atkinson**, Director of Planning and Regeneration, Harborough District Council
- **Kath Lawless**, Interim Lead Local Plans, Wirral Metropolitan Borough Council
- **Rachel Jones**, Principal Consultant, Planning Advisory Service
- **Rachael Ferry-Jones**, Peer Challenge Manager, Planning Advisory Service

#### 3.2 Scope and focus

3.2.1 The aim of this PPC is to help the service play a leading role in the delivery of CDC's corporate aims to create a council that's proactive and responsive to the needs of its residents and businesses in a fast-changing environment and to build for the future while respecting its heritage. The peer challenge sought to identify where ambitions can be stretched and where improvements need to be made so that planning is at the forefront of practice in shaping the future of the Cotswolds.

3.2.2 The scope of the review was developed following initial conversations and correspondence with CDC as well as consideration of the background documents supplied to the peer team in advance of the review. These helped the peer team to shape their focus of the peer challenge around the following core components as they relate to the functioning of the planning service. The peer team feedback is presented against these key themes:

- Vision and leadership
- Performance and management
- Engagement (partners and the community); and
- Achieving outcomes.



### 3.3 The peer challenge process

- 3.3.1 Peer challenges are improvement focused; it is important to stress that this was not an inspection. The process is not designed to provide an in-depth or technical assessment of plans and proposals. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.
- 3.3.2 The peer team prepared by reviewing a range of documents and information to ensure that they were familiar with the council and the challenges it is facing. The team then spent three days onsite, during which they:
- Gathered information and views from more than 29 meetings, in addition to further research and reading.
  - Spoke to more than 75 people including a range of council staff, elected members and external stakeholders
- 3.3.3 There was however limited engagement with some stakeholders; a limited number of councillors were engaged and there was no interview with the Leader of the Council. Additionally, interactions with external partners were minimal, and no meetings were conducted with the County Council. This should be considered when reviewing the feedback, although opportunities were made available for comments to be submitted to the PPC Manager separately.
- 3.3.4 This report provides a summary of the peer team's findings. In presenting feedback, they have done so as fellow local government officers and members.

## 4 Detailed findings

### 4.1 Vision and leadership

- 4.1.1 The Chief Executive has articulated a clear vision for the future of CDC, and the recent appointments of the Director of Place and Communities and Assistant Director of Planning Services is pivotal in advancing CDC's ambitions through their leadership of the planning service. It is also evident that both the political and managerial leadership are dedicated to fostering the right conditions for staff to thrive; however, this commitment is not always fully understood by the staff themselves. The emerging People Strategy will establish a set of values and behaviours for employees, which is particularly important as CDC continues to grow and further services transition back to the council from Publica.
- 4.1.2 The council's Corporate Plan (2024 to 2028) provides direction through its objectives and principles. This focuses on the difference to be made in the district and its communities through effectively and appropriately positioning the council. The key objectives of the Corporate Plan include:
- Delivering good services
  - Responding to the climate emergency
  - Delivering housing
  - Supporting communities
  - Supporting the economy
- 4.1.3 While officers are generally aware of the Corporate Plan, a noticeable disconnect exists between the planning service and its role in supporting the delivery of specific corporate priorities. This may stem, in part, from the fact that the Corporate Plan was developed during a time when the planning service was managed by Publica, and it is further compounded by the limited marketing materials available within the council offices. This is not however unique to CDC, as other councils experience similar challenges where



planning services are viewed as primarily regulatory rather than enabling, sometimes operating in isolation from broader corporate objectives. National Planning Policy requires the planning system to contribute towards the achievement of sustainable development addressing economic, social and environmental objectives. Corporate plans typically encompass similar objectives, sometimes leading planning services to assume an implicit alignment with corporate priorities, even if they do not directly engage with them.

- 4.1.4 Disconnect between the council's corporate priorities and the planning service can however create uncertainty and misalignment, ultimately limiting opportunities for effective collaboration across the council. We were advised that the Corporate Plan is set to be refreshed, presenting an important opportunity to actively involve the planning service in its development. This involvement can foster a greater sense of ownership over shared ambitions. With the planning service now mostly integrated back into the council, there is an ideal opportunity to cultivate a collective vision and adopt a unified "one council" approach to achieving these objectives. It is critical that staff within the planning service understand their role and contribution to delivering on this including opportunities to support growth and investment in the area.
- 4.1.5 The need for improved engagement between the planning service and corporate priorities at CDC works both ways and there is a noticeable lack of senior managerial and political leadership in the development of a comprehensive and up-to-date local plan. A local plan sets out the vision for how a specific area should develop over a set period, typically 15-20 years. It is a key planning document that guides decisions on where, how much, and what type of development should occur, ensuring it aligns with national policy and local need. Such a plan is therefore crucial for articulating the spatial interpretation of CDC's corporate priorities and establishing the development framework that guides decisions made by the planning service. Without a robust and up-to-date local plan, there is a risk that efforts to align the planning service with corporate objectives may falter, leading to inconsistencies in decision-making and potential conflicts between regulatory requirements and community needs.
- 4.1.6 We recognise that developing a local plan takes time, and that projects may emerge outside the planned framework. Notwithstanding, the development of a comprehensive local plan will provide the necessary structure for meaningful discussions and informed decision-making. This is vital for fostering collaboration and ensuring that all key stakeholders are engaged in the process. By doing so, the planning service can better understand how corporate priorities can be aligned to sustainable development objectives for the area. Ultimately, it is not a case of corporate objectives prevailing above all else. Rather, it is critical that the planning service is fully engaged, ensuring that all perspectives are considered and that decisions align with broader corporate ambitions and regulatory frameworks. This will also help to ensure that planning services are better engaged in future updates to the Corporate Plan and objectives aligned where appropriate.
- 4.1.7 CDC's current Local Plan was adopted in 2018. In 2020, following a review by CDC, work began on a partial update of the local plan to take account of (then) new corporate objectives and national planning policy changes with the aim of making the plan "green to the core". The current Local Development Scheme (LDS) (March 2025) anticipates that this update will be submitted for examination in the summer of 2026. This is some six years after work began albeit meeting the Government's timetable for submitting plans in the current plan-making system by December 2026.
- 4.1.8 The partial update of the Local Plan would not provide a comprehensive update of all policy areas. The LDS sets out that a second development plan document, the development strategy and site allocations plan, will be developed to set out the overall framework for future development growth in Cotswold District to 2046. It states that the partial Local Plan update and the development strategy and site allocations plan will cover different parts of the Local Plan. The aspiration is to combine the two Local Plan projects into a single Local

Plan document at an unspecified later date, but in the meantime the two Local Plan projects are being progressed separately.

- 4.1.9 The timetable for bringing forward the development strategy and site allocations plan is however outside of the current plan-making system. The LDS sets out that preparation and submission for examination will be after the December 2026 deadline set by government for submission of plans prepared under the current system. If the LDS timetable is retained this plan will be prepared in the new plan-making system. This is important as in the new plan-making system instead of separate development plan documents authorities must develop a single comprehensive local plan and only one local plan may have effect in relation to a local planning authority's area at any one time<sup>2</sup>. Consequently, any plans developed under the new plan-making system will supersede previously adopted plans which emphasises the need for them to be comprehensive strategies.
- 4.1.10 There is a pressing concern that the current focus on a partial update of the existing local plan may hinder the capacity to produce a comprehensive up-to-date Local Plan at the earliest opportunity. Focussing on a partial update diverts limited staff resources from developing a comprehensive Local Plan, whether that be in the current or new plan-making system. It is advisable to abandon attempts to produce two separate local plan documents, which is not feasible under the new system, and instead concentrate resources on developing one district-wide local plan document. While submitting a single comprehensive local plan for examination by December 2026 represents an ambitious timeline, it could be achievable with focused leadership, dedicated resources, and appropriate investment in both in-house capacity and external expertise. This approach would provide a clear strategic direction, and any work undertaken would remain valuable even if the plan preparation extended into the new plan-making system.
- 4.1.11 It is essential for CDC to urgently explore its options for developing an up-to-date and comprehensive local plan, as it is currently facing several significant challenges that demand strategic attention. Among these challenges is the rise in local housing need figures calculated under the national standard methodology and the consequent impact on CDC's 5-year housing land supply. Without a robust local plan that outlines a clear development strategy for future growth, the council risks speculative and unplanned development, which could lead to development in less sustainable locations. It could also give rise to substantial resource implications, for example, staff time and risks of costs associated with planning appeals. A comprehensive approach is vital for establishing the council's strategy regarding the amount, type, and location of development, all while addressing the new housing figures and aligning with broader economic, environmental, and social objectives.
- 4.1.12 We acknowledge that there are complex decisions to be made and that options will need to be appraised against any potential risks to the council and all within the context of ongoing national changes to the planning system. We are expecting Government to publish National Development Management Policies this year which will have an impact on local plan content. Local government reorganisation and the preparation of strategic spatial development strategies at a wider than local level will also impact plan-making. The reality is however that there is never a truly "stable time" for plan-making as things are constantly changing and evolving.
- 4.1.13 It is crucial for the council to maintain a proactive stance in its planning efforts, even when faced with unexpected changes or uncertainty. By creating an up-to-date comprehensive Local Plan, the council can establish a framework that promotes sustainable development in the area over time. This will effectively guide future transitions and support long-term growth during this dynamic period of local government reorganisation. Ensuring that local

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<sup>2</sup> Schedule 7 of the Levelling-up and Regeneration Act 2023

communities and developers using the service continue to receive optimal support from CDC, regardless of any changes in administrative boundaries.

- 4.1.14 As part of our government grant-funded program, PAS provides assistance to councils in developing local plans within the current planning-making system, and we are also working with planning authorities to prepare for upcoming plan-making reforms. We recommend that CDC engage with PAS to explore how to conduct an options and risk appraisal that will support the advancement of the local plan effectively.

## 4.2 Performance and management

### The team

- 4.2.1 In November 2024, most of the planning service transitioned back to the council from Publica's management. Conversations with staff indicate that this change has contributed to increased stability, complemented by effective interim management throughout the 12-month period leading up to our visit. The permanent recruitment of the Director of Place and Communities and Assistant Director of Planning Services is a positive development that will enhance staff stability and support the ongoing integration of the service within the council.
- 4.2.2 The planning team exhibited high morale, a spirit of mutual support, and a strong commitment to achieving positive outcomes. Staff take pride in their work, demonstrating genuine dedication to securing the best results for CDC and its historic and complex environment. The location and its associated planning challenges interest staff members, which is evident in the team's enthusiasm and the lengthy tenure of some employees. We heard that staff often work additional hours as good-will.
- 4.2.3 We learned that there have been recruitment challenges, partly due to the terms and conditions of the previous employer, Publica. Staff shared that career progression opportunities were often limited, typically available only when a promotion became vacant. This, along with non-competitive terms compared to other councils, has led to periods of high staff turnover and stress, illness, and increased pressure within the team. While the situation has improved considerably, some legacy terms and conditions have been carried over into the council, and staff continue to express concerns about the lack of career advancement opportunities. As a result, some employees are contemplating job options elsewhere. Additionally, disparities in terms and conditions exist, depending on when staff were employed by the council or Publica, further complicating morale and cohesion within the team.
- 4.2.4 The reintegration of the planning service into the council presents a valuable opportunity to reevaluate staff terms and conditions while enhancing career progression pathways. We recognise that this may require a broader examination across the council and that there may be contractual complexities related to the transition from Publica. However, we believe it is crucial for the council to explore ways to improve these aspects, as robust career progression opportunities are vital for fostering team cohesion and retaining valuable talent.
- 4.2.5 Informal relationships within the various areas of the planning service appear to be very strong. This positive dynamic is bolstered by shared office space and designated touchpoint days when different teams come together. While flexible and agile working arrangements are appealing to staff and should be preserved, we recommend creating additional opportunities for in-person collaboration that serve a clear purpose. Examples of this could include joint team meetings, service briefings, and collaborative workshops.
- 4.2.6 However, we observed that while these informal relationships are beneficial, the service relies heavily on individual initiative to foster them, and more formal working arrangements are not consistently embraced across the board. For instance, the Ecology, Heritage, and Design Team is well-resourced and provides critical support to Development Management regarding the review and determination of planning applications. Although this support is invaluable, we learned that response times from the team can lead to delays in the

decision-making process, causing case officers to request extensions of time that may not always be necessary. Given that performance monitoring falls on the case officer, it is understandable that they are concerned when timelines are stretched. While the Ecology, Heritage, and Design Team takes pride in their contributions and recognises the positive outcomes from improving schemes through their input, it would be more effective to address these discussions during the pre-application phase or earlier in the decision-making process. Striking a balance between encouraging constructive amendments and ensuring timely application determinations is essential.

- 4.2.7 There appears to be some confusion between these teams regarding their responsibilities for report writing when submitting applications for determination. We understand that the Ecology, Heritage, and Design Team is tasked with determining Listed Building applications submitted in isolation; however, when a planning application is submitted alongside such a request, the responsibility falls to Development Management to handle both. This has led to a disconnect and frustration among the teams concerning who should take ownership of specific tasks. While it is common for these functions to be organised into separate teams, many councils successfully integrate ecology, heritage, and design teams within Development Management, thereby clarifying roles and responsibilities. Each structural approach has its advantages and disadvantages, but regardless of the model adopted, it is crucial to establish a formal service level agreement. This agreement will help ensure that staff clearly understand their roles and responsibilities and how these relate to the work performed by their colleagues. Fostering a more collaborative understanding of how the teams interconnect, along with defined responsibilities, will enhance overall effectiveness and help deliver corporate priorities.
- 4.2.8 The Planning Policy team is currently managing a wide range of projects, which is affecting their ability to focus on core tasks, including the development of the Local Plan. It is essential for the council to address the resource constraints and capacity issues facing this team if it intends to act on one of the fundamental recommendations of this report, to proceed without delay on developing a comprehensive and up-to-date Local Plan. The team is positive, dedicated, and has fostered strong relationships throughout the service. Their collaboration is evident, particularly in the use of a shared database linking policy and Development Management, which records feedback on the implementation of specific planning policies. Such joint working is not always common between these services in councils and should be commended. Additionally, we noted the valuable support provided to the team by their colleagues in Ecology, Heritage, and Design.
- 4.2.9 We were pleased to see a dedicated infrastructure delivery lead, technician, and monitoring officer within the Planning Policy and Infrastructure team. This area of planning services is often under-resourced, making it essential for the team to receive strong backing from senior leadership to ensure they have the necessary resources and governance framework to deliver an effective service. While our evaluation did not specifically focus on this aspect of the service, it is worth noting should CDC find it beneficial, that PAS currently offers a support programme aimed at councils in this field. This program is designed to assist councils in enhancing the governance of developer contributions and promoting improved infrastructure planning and delivery through infrastructure delivery plans.
- 4.2.10 Although the transition from Publica has successfully brought the majority of the planning service back to the council, the administration and validation roles have remained with Publica. This arrangement has understandably met with mixed reactions from both the staff retained by Publica and the council employees who rely on these crucial roles to ensure effective service delivery.
- 4.2.11 While addressing the contractual arrangements with Publica is beyond the scope of this PPC, if these services cannot be brought back in-house, it is essential to establish robust governance arrangements and clear lines of accountability. A formal framework should be developed between Publica and CDC to ensure CDC maintains appropriate control over

processes, costs, and service standards. This should address the current inconsistencies in processes between councils, such as neighbour consultation and validation procedures. Additionally, focused effort must be made to fully integrate Publica staff into the wider planning team, ensuring they receive adequate support and recognition for their contributions, and understanding of their importance to the overall success of the service. This integration is crucial for maintaining service quality and fostering a unified team approach.

#### Overall performance - Development Management

4.2.12 The Development Management (DM) service is performing well (see Table 1 below) against the Government's national performance indicators for speed of processing planning applications. This is a significant improvement following the joint DM review in 2022 and the potential risk of designation. This provides a strong foundation for further enhancements.

4.2.13 Table 1 – Speed of processing Major and Non-Major Planning Applications

Criteria: Speed									
Council Cotswold District Co									
District matter Majors (151a)									
	All Major Decisions	Major Decisions within 13 weeks	PPA, EoT or EIA Decisions	PPA, EoT or EIA Decisions in time	Out of time (allowing EOTs)	Out of time (excluding EOTs)	Result (allowing EOTs)	Result (excluding EOTs)	
Q1 Oct - Dec 2023	7	2	5	3	2	5	71%	29%	Q1 Q1
Q2 Jan - Mar 2024	9	2	7	7	0	7	100%	22%	Q2 Q2
Q3 Apr - Jun 2024	10	3	7	7	0	7	100%	30%	Q3 Q3
Q4 Jul - Sep 2024	11	3	7	7	1	8	91%	27%	Q4 Q4
Q1 Oct - Dec 2024	4	1	3	3	0	3	100%	25%	Q1 Q1
total (allowing EOTs)	41	11	29	27	3		93%		
total (excluding EOTs)	41	11				30		27%	
Min. level required (inc. EOTs) 60%									
Assessment is made late December 2025, for designation announcement early 2026									
Non-majors (153)									
	Non-major Decisions	Non-major Decisions within 8 weeks	PPA, EoT or EIA Decisions	PPA, EoT or EIA Decisions in time	Out of time (allowing EOTs)	Out of time (excluding EOTs)	Result (allowing EOTs)	Result (excluding EOTs)	
Q1 Oct - Dec 2023	272	122	137	122	28	150	90%	45%	Q1 Q1
Q2 Jan - Mar 2024	271	97	149	135	39	174	86%	36%	Q2 Q2
Q3 Apr - Jun 2024	268	109	139	128	31	159	88%	41%	Q3 Q3
Q4 Jul - Sep 2024	291	146	123	113	32	145	89%	50%	Q4 Q4
Q1 Oct - Dec 2024	258	134	113	108	16	124	94%	52%	Q1 Q1
total (allowing EOTs)	1360	608	661	606	146		89%		
total (excluding EOTs)	1360	608				752		45%	
Min. level required (inc. EOTs) 70%									

Things to highlight from Table 1:

- Current performance **comfortably above** targets – 93% for major applications and 89% for non-major applications.
- Current performance, **excluding extensions of time** is 27% for Major applications and 45% for non-major applications.

4.2.14 Like many other planning services, current performance levels rely heavily on 'extensions of time' (agreements with applicants to extend the decision-making timeframe). Messages from Government suggest that future performance will rely less on extensions of time and had previously proposed stricter targets excluding extensions of time as 60% for major applications and 50% for non-major application. In December 2024 the Government published an update to the designation criteria, which retained the existing targets. CDC, like most other local planning authorities, now has additional time to reduce reliance on extensions before stricter metrics are introduced.



- 4.2.15 While there is still work to be done, we acknowledge the progress made as part of the DM improvement initiatives to improve the percentage of decisions made 'in time' without reliance upon extensions of time. This effort has been bolstered by the publication of the "Negotiating Submitted Applications Procedure Note" (2023). This guidance provides clarity to applicants regarding the circumstances under which the council will engage in negotiations for minor amendments. Officers have found this particularly beneficial, as it offers applicants a clear framework and solid rationale that aids in managing their caseloads. Furthermore, it encourages proactive engagement in the pre-application process, which is the ideal setting for initial negotiations. We recommend that this guidance be made more easily accessible on the website and that all teams within the planning service be informed of and adhere to the guidelines outlined in the procedure note.
- 4.2.16 We acknowledge and commend the significant efforts made to reduce the backlog of expired cases, increase the rate of decision-making and improve the number of cases that individual officers have in hand. These improvements have brought about meaningful progress in this area and contribute to greater stability within the service. As a result, staff are able to manage their caseloads more effectively, leading to a more efficient and productive work environment.

#### Overall performance – Enforcement

- 4.2.17 We have been informed that the number of open enforcement cases has gradually decreased since peaking in October 2024. While efforts are underway to expedite this process through the development of the Local Enforcement Plan, it is evident that staffing challenges must be addressed to effectively support this work. Staff members possess valuable insights and innovative ideas for enhancing this aspect of the planning service; however, due to resource constraints, they often lack the time and opportunity to develop and implement these suggestions.
- 4.2.18 To improve the situation, we recommend that the council prioritise the recruitment and allocation of additional resources within the enforcement team. This would not only reduce the backlog of cases more swiftly but also provide staff with the capacity to explore and implement their ideas for improvement. Additionally, establishing a structured forum for staff to share their insights and recommendations could empower them and foster a more collaborative environment focused on reinforcing the enforcement process. Care should also be taken to ensure that members are closely involved in setting and agreeing enforcement priorities. This will foster a closer working relationship and should address any tensions between what members expect of the enforcement service and what is achievable.

#### Overall performance – Local Plan

- 4.2.19 Section 4.1 of this report details our recommendations on the pressing need for the council to spearhead the development of a comprehensive and up-to-date Local Plan. This is critical for the future of planning in the area; however, it does not detract from the acknowledgment of the successful achievement of numerous objectives outlined in the 2018 Local Plan. This has included the council consistently meeting the housing delivery test targets which are a national benchmark that evaluates whether planned housing requirements have been fulfilled within a specified timeframe. While circumstances have evolved and a revised development strategy is necessary, CDC has demonstrated its ability to successfully implement local plan policies, establishing a solid foundation for the future.

#### Streamlining services - Income generation and digital capacity

- 4.2.20 In April 2024 a [pre-application and discretionary fees charging schedule](#) was published on the council's website. Staff advised that it is used by repeat planning agents and architects and usually for more complex householder pre-applications, often dealing with schemes with a significant heritage input. The protocol includes scope for additional written reports and meetings, although this is an area where uptake is not high and is something CDC would like to work on improving. Feedback on the pre-app service is generally good, and the 2023 Negotiation procedure note also indicates that CDC may be more lenient when it

comes to negotiating planning applications that have been subject to pre-app where schemes can be made acceptable through minor amendments.

- 4.2.21 The charging schedule generally aligns with best practices recognised by PAS and adheres to the guidance available on our website. To strengthen its offerings, CDC might consider introducing scoping meetings to discuss the principles of development, which tend to be well-received by developers, especially for larger sites. These meetings could include a fixed hourly fee, with varying rates based on the expertise and role of different officers. Additionally, the current schedule does not incorporate Planning Performance Agreements (PPA's), which are crucial for efficiently managing large-scale applications and ensuring that income generation is sufficient to cover the associated resource requirements. Further guidance on PPA's is available on the [PAS website](#).
- 4.2.22 Our discussions did not reveal any particular focus on digital innovation within the planning services. This is a fast-evolving area and separately we discovered that West Oxfordshire and CDC were awarded funding from the PropTech Engagement Fund in 2022. This was used to explore improvement to the back-office functionality to enhance the submitting, processing and analysing of representations gathered through consultation in the plan-making process. The implementation of the platform significantly increased the volume of responses to planning consultations. Building on this work, the councils explored Artificial Intelligence solutions to support the management and analysis of responses to consultations. The LGA have [published a case study](#) of this work.
- 4.2.23 While this work is being recognised nationally as a best practice, other teams within CDC's planning service remain unaware of its existence. For CDC to enhance its planning operations and effectively leverage digital innovations to improve efficiency, engage the community more successfully, and achieve better outcomes, it is crucial that this work be better disseminated and understood throughout the entire service.
- 4.2.24 The government is committed to developing a digital planning programme aimed at creating a modern and efficient planning system in England. This initiative seeks to transition from a document-based approach to a data-driven, standards-based system that utilises contemporary, user-centred products and services. The goal is to speed up the planning process through improved decision-making, faster plan-making, greater access to planning data, and enhanced community engagement. Regular updates on the programme are available on the [Open Digital Planning](#) website and MHCLG's [data platform](#). We recommend that CDC actively engage in these initiatives to adopt best practices and innovations that support an efficient planning service. This engagement should include ensuring that appropriate resources are allocated to lead these efforts across the service.

#### [Performance management](#)

- 4.2.25 Performance management within the service currently lacks consistency, with some staff members enjoying regular or ad hoc one-on-one meetings with their line managers, while others have no such opportunities. Furthermore, the processes for appraisals are unclear, along with their connection to the broader corporate performance management framework. To address these issues, it is essential for CDC to develop a unified and transparent performance management system.
- 4.2.26 The implementation of regular team meetings and one-on-one sessions between staff and their line managers will foster open communication and provide a platform for addressing performance-related concerns. A clear and consistent appraisal process should be established, aligned with the corporate performance management framework and incorporating feedback from staff. Defining specific key performance indicators (KPIs) that align with corporate objectives and the emerging People Strategy is vital, as these metrics should be communicated to all staff members to enhance their understanding of expectations and responsibilities.

4.2.27 Creating an environment that encourages staff engagement is crucial, as it fosters a sense of ownership and value among employees, who are CDC's most significant asset. Alongside a structured performance management system, all staff should have access to personal development plans and clear career progression opportunities. Investing in a corporate performance management system can aid in integrating various performance metrics and facilitating progress tracking. Additionally, utilising infographics for the clear communication of performance data will make it easier for staff to understand their achievements and objectives. By implementing these measures, CDC can create a more equitable and effective performance management system that values employee contributions, fosters professional growth, and aligns with the organisation's strategic objectives.

#### Planning committee

4.2.28 Planning committee is a significant investment of time and resources for most councils, necessitating close collaboration among the planning, democratic services, and legal teams. It serves as an important conduit for the council, playing a crucial role in ensuring democratic and transparent decision-making on often controversial issues.

4.2.29 The revised scheme of delegation has proven effective in enhancing the management of CDC's planning committee, ensuring that the appropriate applications are discussed publicly. However, this change has not been universally embraced by some town and parish councils, who have expressed concerns that it has led to reduced transparency and diminished local democratic participation.

4.2.30 Reports to committee are presented clearly and transparently, and there is a noticeable positive rapport between officers and committee members. Officers deliver effective presentations, and the committee is well organised. While the length of questioning and debate during the meetings we observed sometimes reached challenging levels, this did not detract from the overall operation of the committee. For additional guidance on planning committee processes, including focused support available through PAS, further resources can be [found on our website](#).

### 4.3 Engagement

4.3.1 The engagement of the local community has been supported through initiatives like the Cirencester Town Centre Framework Masterplan consultation, and Neighbourhood Plans, demonstrating where community involvement can lead to positive outcomes. The developers we met also showed a keen interest in engaging with the council, which provides a platform to foster effective collaboration. In addition, we were impressed with the wider corporate approach to partnership working which has led to innovative ideas for stakeholder engagement, including the current partnership framework for delivering affordable housing schemes. It is important that the planning service understand the ambitions of this partnership and how their role can support the delivery of much needed affordable housing in CDC.

4.3.2 While we heard that the policy team is actively working with neighbouring authorities and the County Council, there is evident confusion amongst stakeholders regarding the local plan which has complicated relationships and engagement efforts for communities, parish and town councils, and developers. There are also challenges receiving comments from statutory consultees on planning applications in a timely manner which further pressurises the use of extensions of time. This is not uncommon across councils and is a challenge that the government is currently examining.

4.3.3 The peer challenge team met with some well-informed community groups, who had a very good understanding of the planning process. Engaging with and consulting communities is an essential part of the planning process and from those we met there is an underlying frustration in terms of the effectiveness of CDCs community engagement on planning applications, access to planning documents and the changes to the scheme of delegation.



This may not be representative of all parish and town councils but to address this, the council should establish a structured and well-publicised engagement programme with parish and town councils. While resource constraints must be carefully balanced, there may be opportunities to utilise existing relationships and processes.

- 4.3.4 CDC's Statement of Community Involvement was published in January 2024. We recommend reviewing the SCI to consider its effectiveness and to use it inform a clear, more structured stakeholder engagement plan with all key partners. A key element of this should be the establishment of a regular Developers Forum, bringing together major developers, agents, and CDC representatives to facilitate constructive dialogue on emerging issues and maintain open channels of communication.
- 4.3.5 Where resources would allow the engagement plan could also include partnership forums across Gloucestershire with the aim of sharing best practice. This may help to support innovative discussions, providing space to explore bold ideas and solutions to CDC's complex planning challenges. This could leverage the expertise of key stakeholders including, where feasible, statutory consultees. This might usefully identify and address shared - and indeed competing - priorities and develop potential solutions. This might foster a more inclusive, collaborative, and forward-thinking planning culture, aligned with both local and regional priorities.

## **4.4 Achieving outcomes**

- 4.4.1 The planning service demonstrates a strong commitment to the overarching principle of 'Green to the Core,' a key message that resonates across all levels of the organisation and that has been embedded in the work on the partial update to the Local Plan. This initiative highlights the council's dedication to sustainability and environmental stewardship in its planning processes.
- 4.4.2 Furthermore, the service has successfully secured grant income to support critical projects such as local plan progression and Green Belt Review. This funding reinforces the council's commitment to developing sustainable communities but also highlights the strategic importance of these initiatives within the broader developmental framework.
- 4.4.3 With the recent appointment of a new Director and Assistant Director focused on place and communities, there is a clear ambition to advance and cultivate sustainable growth within CDC. This leadership role will play a pivotal part in enhancing the council's capacity to manage growth effectively while ensuring that community needs are met in a sustainable manner.
- 4.4.4 Clarity regarding the local plan and the future development framework for the area is essential to mitigate the risk of unplanned developments. Ensuring that all stakeholders are informed and engaged is crucial for maintaining a cohesive planning strategy. Enhanced internal relationships and working arrangements, especially regarding consultation responses, processes, and engagement with specialist officers, will further improve the council's ability to make well-informed decisions that align with corporate goals.
- 4.4.5 Budget management is another critical area that requires attention. For managers to effectively consider income generation opportunities and savings, they need access to a detailed understanding of the financial position of their operations. This capability will empower managers to make informed decisions that align with the council's strategic objectives while also ensuring that resources are allocated efficiently. Accountability for departmental budgets must be a priority, with a focus on identifying further opportunities for income generation.
- 4.4.6 To drive these initiatives forward, the council should develop a comprehensive service plan that outlines clear priorities and timelines. Accelerating the local plan's progression while enhancing engagement with both internal and external stakeholders is vital for achieving

successful outcomes. Additionally, conducting a thorough resource planning assessment across the service will ensure that all teams are aligned with key priorities, ultimately leading to more effective and streamlined operations. This should also include consideration of resources required to support the planning service, including legal services where we know there are challenges that are not unique to CDC.

- 4.4.7 The council should actively celebrate successes, both big and small, as this will motivate staff and stakeholders alike. This can be achieved through various channels, such as newsletters, social media, and public announcements. Highlighting case studies that demonstrate sustainable planning outcomes will not only recognise the contributions of various stakeholders but also motivate continued participation in future engagement efforts. This approach cultivates a culture of collaboration and shared success that benefits the entire community.

## **5 Implementation, next steps and further support**

- 5.1 It is recognised that the Council and service will want to consider and reflect on these findings.
- 5.2 To support openness and transparency, we recommend that the council shares this report with officers and that they publish it for information for wider stakeholders. There is also an expectation that the council responds to the finding in the report and develops an action plan to be published alongside the report.
- 5.3 Where possible, PAS and the LGA will support councils with the implementation of the recommendations as part of the Council's improvement programme.
- 5.4 A range of support from the LGA and PAS is available on our websites. Some specific areas of support that CDC might wish to look at includes:
- [Support for Plan-Making](#)
  - [Development Management Challenge Toolkit](#)
  - [Improving governance of developer contributions](#)
- 5.5 It is recommended that CDC discuss ongoing PAS support with Rachael Ferry-Jones, PAS Principal Consultant, [rachael.ferry-jones@local.gov.uk](mailto:rachael.ferry-jones@local.gov.uk) and any corporate support with Paul Clarke, Principal Adviser, [paul.clarke@local.gov.uk](mailto:paul.clarke@local.gov.uk)
- 5.6 As part of the LGA's peer review peer impact assessment and evaluation, PAS and the LGA will contact the Council in 6-12 months to see how the recommendations are being implemented and the beneficial impact experienced.
- 5.7 The author of this report is Rachael Ferry-Jones ([rachael.ferry-jones@local.gov.uk](mailto:rachael.ferry-jones@local.gov.uk)), on behalf of the peer challenge team.
- 5.8 This report was finalised in agreement with the Council on XXXXXX
- 5.9 We are grateful for the support of everyone that contributed to this review.