



Planning Service Peer Challenge

Cotswold District Council

25th – 27th 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 Publica¹, 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

¹ 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	Enhance internal communication and understanding 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	Provide for the planning service to have an active involvement in the Corporate Plan refresh 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.
3	Conduct an options appraisal to inform the development of the Local Plan 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. 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.
4	Implement robust project management and governance frameworks 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. 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.
5	Review and revise staff terms and conditions 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.
6	Enhance formal collaboration among teams and establish service level agreements 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.
7	Prepare to reduce the use of Extensions-of-Time (EoTs) Prepare to reduce reliance on extensions of time for planning applications in anticipation of stricter government targets while maintaining constructive and transparent applicant dialogue.
8	Review and improve the Planning Performance Agreement (PPA) process 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.
9	Strengthen Planning Enforcement resources 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.
10	Maximise digital capabilities and embrace technological innovation 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. 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.
11	Develop a comprehensive stakeholder engagement plan 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. 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. 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.
12	Develop a comprehensive service plan with robust performance monitoring 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.

	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. 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.
13	Enhance financial transparency and accountability 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.

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 time². 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

² 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

- 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 and any corporate support with Paul Clarke, Principal Adviser, 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), 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.