



COTSWOLD
DISTRICT COUNCIL

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET - 10 JULY 2025
Subject	ENDORSEMENT OF THE PAS PLANNING SERVICE PEER CHALLENGE REPORT (MAY 2025) AND ACTION PLAN
Wards affected	All wards
Accountable member	Cllr Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning Email: Juliet.Layton@cotswold.gov.uk
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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">1. Endorse the PAS Planning Service Peer Challenge Report (May 2025) and its recommendations, and to endorse the resultant Action Plan for implementation.2. Agree to publish the report and the accompanying Action Plan on the CDC Planning and Building web pages.



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Corporate priorities	<ul style="list-style-type: none">• Provide socially rented homes• Make our local plan green to the core• Support health and wellbeing• Enable a vibrant economy
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 25th to 27th 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>Enhance internal communication and understanding</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>Provide for the planning service to have an active involvement in the Corporate Plan refresh</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>Conduct an options appraisal to inform the development of the Local Plan</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>Implement robust project management and governance frameworks</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>Review and revise staff terms and conditions</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>Enhance formal collaboration among teams and establish service level agreements</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>Prepare to reduce the use of Extensions-of-Time (EoTs)</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>Review and improve the Planning Performance Agreement (PPA) process</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>Strengthen Planning Enforcement resources</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>Maximise digital capabilities and embrace technological innovation</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>Develop a comprehensive stakeholder engagement plan</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>Develop a comprehensive service plan with robust performance monitoring</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>Enhance financial transparency and accountability</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)