



Planning Service Peer Challenge

South Gloucestershire Council

On-site 24th to 26th May 2022

Feedback Report
August 2022

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1. Background & Context

- 1.1 Following an initial scoping meeting in September 2021, a proposal was agreed for how the Planning Advisory Service (PAS) could support South Gloucestershire Council (The Council) through a peer challenge of the Planning Service.
- 1.2 Peer challenges are managed and delivered by the sector for the sector. They are tailored to meet individual Councils' needs and designed to complement and add value to a Council's own performance and improvement focus. They help planning services review what they are trying to achieve; how they are going about it; what they are achieving; and what they need to improve.
- 1.3 An over-arching objective of the peer challenge at South Gloucestershire was to consider how well the planning service is focusing on and assisting in delivering the organisation's short, medium and long-term strategic priorities. The goal was to challenge the service in a constructive and enabling way with a slightly broader lens than planning, including regeneration and proactive approaches to community development.
- 1.4 The peer review team assessed how well-focused the service is by using a series of pre-agreed questions and propositions, linked to five main themes:

Theme	Questions
<p>Vision and leadership - how the authority demonstrates leadership to integrate planning within corporate working to support delivery of corporate objectives</p>	<p>Is planning playing its part delivering the broader organisation's goals?</p> <p>Is it clear how potential differences between the council's quasi-judicial role as LPA and the council as landowner and developer are understood, and resolved in a way which is clear, consistent, and maximises delivery of the council's overall objectives?</p> <p>How well is the strategic vision, specifically around regeneration and high quality development, being reflected in delivery through the planning function?</p>
<p>Performance and Management - the effective use of skills and resources to achieve value for money, and the effectiveness of processes (and the roles of officers and members) in decision-making on development proposals.</p>	<p>Is the council clear about its performance and delivery in the planning service? Is it clear about where it is strong, and where improvement is needed? Is there evidence of ambition for the service and of improvement being sustained?</p>

	<p>Are members comfortable in supporting the delivery of a business-like service?</p> <p>Does the work of the planning service focus on the areas where it can make the biggest difference?</p> <p>Is everyone clear that recent interventions really have improved service delivery?</p>
<p>Community engagement – how the authority understands its community leadership role and community aspirations and uses planning to help deliver them.</p>	<p>How well does the service meet the communities' needs?</p> <p>How well does the service engage with, listen to, and respond to different communities within South Gloucestershire?</p>
<p>Partnership engagement – how the authority works with partners to balance priorities and resources to deliver agreed priorities.</p>	<p>How do the strategic partners experience the planning service?</p> <p>How well is the service innovating in this area?</p> <p>Do potential investors understand the offer that the council is making, making South Gloucestershire an investible proposition for innovation and high quality development?</p>
<p>Achieving outcomes - how well the service leverages national and local planning policy to deliver the sustainable development and planning outcomes its community requires.</p>	<p>Is the way the service is delivered making the best of the council's combined resources?</p> <p>Is everybody in agreement on the priority outcomes? And are they the best possible ones?</p>

2. Executive Summary

- 2.1 South Gloucestershire has an ambitious and exciting planning agenda and is delivering some significant outcomes, for example exceeding its housing targets and thereby providing much needed homes for its existing communities and helping to support further inward investment. In addition, the service has been instrumental in driving the receipt of millions of pounds of contributions towards new infrastructure through s106 agreements and CIL as well as the direct provision of new social infrastructure in the form of new affordable homes for rent.
- 2.2 The level of recent growth and investment in South Gloucestershire has been significant. However, there are concerns over the quality of the development that has happened and the Council has very clear ambitions to improve this and to promote higher quality design and place making that will enable South Gloucestershire to create a clear and positive identity. Whilst these ambitions are clear at the higher levels of the Council, it is evident that this vision has not yet been fully embedded across the wider organisation or with key strategic partners who will be instrumental in its delivery.
- 2.3 In terms of performance, this has been a matter of recent concern and scrutiny – leading to the putting together of an Improvement Plan, which has a four-year delivery timescale. At the time of this report, the service is approximately half-way through its delivery. Whilst the existing Improvement Plan has made some positive changes, there are concerns over the overly lengthy delivery period and the lack of any substantial and sustained changes in performance to date, notably in relation to key national KPIs. As a result the Improvement Plan needs to be urgently reviewed and, in particular, a greater injection of pace made.
- 2.4 A Delivery Plan is required to bring all this together and to ensure that the Service is fit for purpose and focussed on delivering the outcomes required to achieve the Council’s ambitions. More widely, the Council’s day-to-day service delivery needs to be better aligned with the vision for better place making and meeting the related needs of communities and stakeholders. This will aid the efficiency and effectiveness of the Development Management service and the other parts of the Service and wider Council who need to work together to deliver the vision. In summary, the Delivery Plan should have the following key components/areas of focus:



2.5 Whilst the Council's growth ambitions are bold and exciting, it needs to be clearer in driving the narrative and be more regularly and pro-actively 'banging the drum' for a better South Gloucestershire. This approach should include focussed media campaigns to drive investment and delivery, together with constructive on-going engagement with communities to ensure that their needs are effectively addressed. Related, the Council should take the opportunity to sharpen its approach to stakeholder management and develop a strategic delivery programme alongside its key partners that will drive its new vision forward. Both internally and externally the Council should celebrate success and recognise the significance of what it is achieving through its planning functions.

3. Key Recommendations

This section summarises the key/priority recommendations. More detail on each one can be found in the main body of the report. The recommendations are numbered to sequentially flow through the five thematic areas, as opposed to being ranked in any priority order.

R1	<p>There is a Corporate need to fully understand the central importance of planning and its critical role, along with others, in achieving Council’s ambitions.</p> <p>The Council has a very clear ambition to address concerns over the quality of recent growth and to promote high quality place making and design that will give South Gloucestershire a clear and positive identity. Planning has a critical role to play in achieving those ambitions, through the progress of key strategies and policy frameworks and through its front-line delivery of services. That role needs to be fully understood and supported corporately, to enable Planning to drive forward the necessary changes that will see the Council’s ambitions realised.</p>
R2	<p>Better communication is required to embed the Council’s vision with partner organisations and staff.</p> <p>Whilst the Council’s vision for South Gloucestershire is clear and understood at senior levels, it is clear that it not yet fully embedded with all levels of staff or with strategic partners. Whilst the vision is exciting and ambitious in equal measure, it needs to be championed more strongly and the story told on a more confident basis. Consideration should be given to a growth-focussed media campaign, to drive the narrative and delivery forward. Within the Council a more robust approach to communicating the vision is necessary to assist understanding priorities, including activities such as staff briefings.</p>
R3	<p>There is a need to accelerate and embed a cultural change within the service to ensure effective delivery of the Council’s ambitions – ‘Team South Gloucestershire’.</p> <p>A revised, more robust, approach to service planning is required to enable the Planning Service to more clearly identify its role in delivering Council priorities (and vice versa). This should help direct the prevailing culture towards a more proactive approach to service delivery. There is evidence of some good working relationships between Planning and other services that are central to the delivery of the Council’s growth ambitions – for example, Housing, Property, Regeneration, Transport and Education. However, there are refinements that could be made to improve this join up and a corporate Growth Board, chaired at Director level, is recommended -in order to assist in driving this improvement forward. The Growth Board should also take an active role in monitoring s106/CIL processes and expenditure.</p>

R4	<p>The current Service Improvement Plan needs to be urgently reviewed, as part of a wider Delivery Plan.</p> <p>The current Improvement Plan has delivered some positive changes, but has not brought about the necessary pace of change required. It needs to be re-focussed as part of a wider Delivery Plan which should also address the related issues of prioritisation and resources. A clear governance structure should be put in place, enabling input from the Council’s Senior Leadership Team and Members, to drive that Delivery Plan forward.</p>
R5	<p>Alongside the wider review of the Improvement Plan, urgent attention needs to be given to managing up performance against national indicators.</p> <p>There is real concern that performance in relation to timely decision making is putting the Council at risk of being put under special measures. This would be very damaging to the its reputation and could seriously undermine confidence in South Gloucestershire as a place to invest. It would also be likely to seriously affect staff morale and views of South Gloucestershire as a place to work, thereby exacerbating current resource concerns.</p>
R6	<p>Four monthly forums should be held with Town and Parish Councils and the provision of training to ensure a better understanding of planning and the wider place making agenda.</p> <p>Parish and Town Councils do not currently have a regular platform to discuss points of common interest, including service delivery matters. Providing a regular opportunity for discussion will assist in building relationships and a better understanding of the Planning process.</p> <p>The council should also work with Town and Parish Councils on the design and delivery of an annual training programme. Ward Members should also be involved in these initiatives, to further strengthen community dialogue and engagement.</p>
R7	<p>Review how Town and Parish Councils views inform decision making and establish mechanisms to ensure that communities and elected representatives are engaged early in the development of new master plans.</p> <p>In the light of concerns raised the mechanisms for reporting parish and town council comments on planning applications should be reviewed to ensure that the views of communities are fully and properly captured. In addition, there is a need to review how and when communities are engaged in master planning processes.</p>

R8	<p>Pre-application and PPA processes need to be re-visited to ensure that they are of value and drive income as well as better outcomes.</p> <p>The Council’s pre-application process has been recently reviewed, but it is clear that there are concerns in the way that it is being delivered which are proving to be deterrents to its use, particularly delays in receiving responses and the lack of sufficient detail in responses to help guide formal submissions. Alongside the use of PPAs, there is a need for a targeted review of the process that will help drive better quality development as well as enhancing income.</p>
R9	<p>Case officers need to be empowered to make decisions in a timely manner.</p> <p>As part of the wider review of what needs to be done to drive up performance in decision making, consideration needs to be given to how officers can be better empowered to make decisions. This will assist in speeding up the process and will take pressure off senior officers within the team, allowing them to be more effectively employed on other key matters including leading on facilitating better outcomes for South Gloucestershire’s communities.</p>
R10	<p>It is vital that the Local Plan is progressed at pace and is fully resourced to achieve the new place making political priorities.</p> <p>The two key foundations that the development industry seeks from any local planning authority are speed in decision making and certainty. In terms of certainty, this is fundamentally centred on having an up-to-date Local Plan in place. Whilst the Council is in a good position in respect of its immediate housing supply, there is an identified need to renew its Local Plan and set the horizons and conditions for growth over the following decades. In that context, this work needs to be brought forward as quickly as possible and the resources needed to achieve that fully assessed.</p>

4. Scope of the review

- 4.1. South Gloucestershire has requested that the Planning Advisory Service (PAS) carry out a peer challenge of its planning service. The over-arching objective of the peer challenge was to consider how well the planning service is focusing on and assisting in delivering the organisation's short, medium and long-term strategic priorities.
- 4.2. The PAS review is carried out by fellow planning professionals with extensive local government experience and a senior councillor.
- 4.3. The review focused on five key areas as they relate to the Planning Service:
- Vision & Leadership
 - Performance and Management
 - Community Engagement
 - Partnership Engagement
 - Achieving Outcomes
- 4.4. It is important to stress that this review is not an inspection; it is improvement focussed and designed to complement and add value to a council's own performance and improvement plans. The review is not designed to provide an in-depth or technical assessment but for the peer team to use their experience and knowledge to reflect on the information presented to them by people they met, things they saw and material that they read while on site.
- 4.5. This report is a summary of the peer team's findings. By its nature, the review represents a snapshot in time. We appreciate that some of the feedback in this report may touch on things that South Gloucestershire is already addressing and progressing.
- 4.6. The PAS review team has presented a verbal summary of this report and recommendations to senior officers in the Planning Service, the Corporate Director, the Council's Chief Executive and Leader.
- 4.7. The PAS review team would like to thank the community representatives, councillors, staff, customers and partners for their open, honest and constructive responses during the review process. All information collected is on a non-attributable basis. The team was made to feel very welcome and would especially like to mention the invaluable assistance and excellent onsite support provided by South Gloucestershire Planning team.

5. Planning Advisory Service (PAS)

- 5.1. PAS is a Local Government Association (LGA) programme which is funded primarily by a grant from Government.
- 5.2. It is our principal mission to ensure that local planning authorities (LPAs) are continuously improving in their execution and delivery of planning services.
- 5.3. To achieve this, the PAS work programme focuses on:
 - a) Helping local government officers and councillors to stay effective and up to date by guiding them on the implementation of the latest reforms to planning.
 - b) Promoting a 'sector-led' improvement programme that encourages and facilitates local authorities to help each other through peer support and the sharing of best practice.
 - c) Providing consultancy and peer support, designing and delivering training and learning events, and publishing a range of resources online.
 - d) Facilitating organisational change, improvement and capacity building programmes - promoting, sharing and helping implement the very latest and best ways of delivering the planning service.
- 5.4. PAS also delivers some of its services on a commercial basis including change and improvement programmes for individual and groups of planning authorities in England, Scotland, Wales and Northern Ireland.

6. The review team

6.1. The peer team is made up of serving council officers, a serving councillor and a PAS review manager:

- **Paul Barnard** – Service Director, Strategic Planning and Infrastructure, Plymouth City Council
- **Philip Ridley** – Head of Planning and Coastal Management, East Suffolk Council
- **Cllr Linda Haysey** – Leader, East Hertfordshire Council
- **Andy Millard** - Peer Challenge Manager and former Director of Place at Thurrock Council

7. Theme 1: Vision & Leadership

- 7.1. Under this specific heading, the review team were asked to consider the following questions:
- *Is planning playing its part delivering the broader organisation's goals?*
 - *Is it clear how potential differences between the council's quasi-judicial role as LPA and the council as landowner and developer are understood, and resolved in a way which is clear, consistent, and maximises delivery of the council's overall objectives?*
 - *How well is the strategic vision, specifically around regeneration and high quality development, being reflected in delivery through the planning function?*
- 7.2. Politically, the administration are very clear in their desire to see high-quality placemaking and better design in new developments. There is a strong feeling that whilst South Gloucestershire has seen a recent surge in inward investment and growth, much of this development has simply 'happened' as opposed to being shaped by the Council and its communities. In pursuit of better growth, there is a related desire for the Council to take a much more significant and pro-active role in placemaking. Planning's central role in proactively delivering this vision needs to be fully recognised.
- 7.3. At managerial level, the Service has a clear view as to which of the Council's objectives it is responsible for delivery against. The Service points in particular to Commitment 14: *We will promote clean, affordable, high quality design of new and existing communities* and; Commitment 15: *We will plan to join up housing and appropriate infrastructure such as schools and transportation networks that make it easier for people to get around, prioritising sustainable and low carbon transport choices*. In support of delivering against these priorities, the Service is bringing forward a new Housing Strategy and is renewing its Local Plan (alongside its collaborative work in progressing the SDS with the WECA).
- 7.4. The new Local Plan will, amongst other things, provide a statutory policy framework for the Council's declared climate emergency and commitment to nature recovery by bringing forward new policies to promote the regeneration of brownfield sites, establishing a 15 minute neighbourhood principle, promoting renewable energy and requiring all new development to be net zero. It will also be important for that document to address the placemaking and design issues that are at the heart of the Council's desire to create a new, high-quality identity for South Gloucestershire.
- 7.5. In terms of delivery, the Service is very much playing its part in the provision of new homes. Delivery rates over recent years are impressive and in excess of expectations. In addition to planning fees, the Service has also been successful in bringing in an annual £20m CIL contributions, £15m in separate s106 payments, £19m New Homes Bonus (between 2018 and 2021) and a total of £36m towards the delivery of affordable housing. This is significant from a corporate budgetary perspective and is to be celebrated.
- 7.6. More widely, the Council plays a role in the direct delivery of new development through its landowner role and via its leading role on various regeneration initiatives. These initiatives are not only important to the delivery of new homes, jobs and infrastructure, but are also

key in helping to 'raise the bar' in respect of placemaking and design. As a consequence, it is important that the Planning service is appropriately engaged in the process of bringing these sites forward at the earliest possible stage.

- 7.7. As previously identified, the strong political desire to establish a new identity for South Gloucestershire is very clear. The Planning Service is already using a variety of tools to assist in achieving that aim. For example, there is a Design Panel in place which is used to help raise the quality of new developments. SPDs are also being used in the transitional period from the current to the new Local Plan, covering matters such as climate change, nature recovery and design. Article 4 Directions have also been effectively used in response to community and Member concerns over the negative impacts of certain types of development within a number of established residential neighbourhoods.
- 7.8. Whilst the Planning Service is clearly having a positive impact in a number of areas, the review team is concerned that the Council's vision is not fully embedded. Whilst senior management are clear on the Council's political and corporate priorities, this does not appear to be the case with the majority of Planning staff – notably within the Development Management Team. This is also seen to be the case in the way in which the Service undertakes business, with various concerns expressed over a lack of a pro-active approach.
- 7.9. From the Service's own perspective, we heard evidence from officers that they felt like invisible processors of applications, with little corporate understanding or appreciation of the complexity and importance of their role.
- 7.10. In order to address these concerns, a more robust approach to Service Planning needs to be undertaken. In particular, there needs to be a clearer 'golden thread' to the Council's various priorities and specific actions identified in the pursuit of each. These should be outcome focussed and build upon the good work that the Service is already achieving. The new Service Plan should also focus on the 'how' as well as the 'what', and include a series of service standards that customers can expect – notably reflecting the more pro-active approaches that the Council desires.
- 7.11. The revised Service Plan should be the driving force for delivery and change. As such, it will need to play a key role in helping to embed staff awareness and understanding of the Council's ambitions. It should also have equally robust governance arrangements surrounding it, involving appropriate levels of regular scrutiny within the service, corporately and at Member level.
- 7.12. Separately, but related, there should be an annual out-turn report that will allow the Service's achievements to be identified and celebrated. This will have the benefit of further embedding the team's understanding of the Council's priorities (and their contribution thereto), the setting of future priority actions and assisting in communities' and partners wider understanding of the value of planning.
- 7.13. The review team heard from a number staff that there were concerns over the amount of work that they are expected to deal with and that management 'see everything as a priority'. The matters of management and performance are looked at in more detail in the following section of this report; however, it is considered that having an improved service planning process in place will assist in more clearly identifying what is/what isn't a priority.

- 7.14. Corporately, this more robust approach to service planning will also assist in the effective and efficient delivery of the Council's wider regeneration and development ambitions. The Review Team found that there were generally positive and emerging relationships between the Planning Service and other parts of the Council which are responsible for the delivery of those aspirations – notably with the Housing Service, but also with the Regeneration and Property Services. This engagement should extend to the earliest stages of master planning, as well as pre-application/application activities.
- 7.15. The Review Team also found that there was a clear understanding of the Council's different roles as the Local Planning Authority and a delivery body in the Planning Service and amongst other officers. Inevitably, there will be some degree of natural tension at times between areas of the Council promoting growth and its Local Planning Authority role (as there is with the wider development industry). This can manifest itself in a number of ways, for example with regard to the desire to maximise land values. The review team consider that whilst current working arrangements are good, they would benefit further from a 'Growth Board' (or similar) being formed and chaired at Director level, so as to ensure the quick and effective resolution of any issues that will inevitably arise.
- 7.16. The Growth Board's role could also extend their role to the scrutiny of major private sector developments and include other services that have a role to play in place making, such as education and transport.

8. Theme 2: Performance and Management

8.1. Under this theme, four specific questions were posed by the Council:

- *Is the council clear about its performance and delivery in the planning service? Is it clear about where it is strong, and where improvement is needed? Is there evidence of ambition for the service and of improvement being sustained?*
- *Are members comfortable in supporting the delivery of a business-like service?*
- *Does the work of the planning service focus on the areas where it can make the biggest difference?*
- *Is everyone clear that recent interventions really have improved service delivery?*

8.2. The Planning Service has a number of KPIs in place. Performance has been under recent scrutiny and the Service is at a half way point in the delivery of a 4-year improvement plan. Meetings are held on a quarterly basis with Development Management Committee Chairs to review performance. Member tours are also held annually (suspended during the pandemic) to review development on the ground and to allow for reflection and learning.

8.3. In certain areas, the Service's performance is excellent – notably in relation to housing delivery. The most recent Housing Land Supply and Housing Trajectory document (2021) reveals that 1,650 new homes were completed in the preceding 12 months, the highest figure for over 20 years. The Council also has a 6-year housing supply in place.

8.4. There is an up to date Local Development Scheme in place, that will guide the preparation of the new Local Plan (due for adoption in 2025). Progressing a sound and timely Local Plan sits alongside 4 other emerging service design principles:

- A focus on place making, securing the best quality within timeframes, including securing homes for all and responding to climate change, sustainability and regeneration challenges
- Ensuring good service-user experience by effective end-to-end service delivery
- Moving towards a self-sustainable service for our discretionary areas and on-selling of other Council services
- Manageable workloads of staff with rewarding roles, career development and the equipment and support needed to do a good job

Noting that this work is emerging, the review team consider that these principles need to be more clearly defined and linked to measurable outcomes. They should then form part of the Service Plan that is identified in the previous section of this report as being essentially required.

8.5. In other aspects, the performance of the service is of some concern. Of particular note is performance in relation to the timeliness of decision making that is currently running the risk of Government intervention. Appeal performance is also very low, with the Council identified as being within the bottom quartile nationally. Given the Council's previous appeal performance, this may be a 'blip' but it is a matter which needs to be fully analysed and any necessary remedial actions quickly put into place. Certain measures have been put in place in an attempt to address some of these issues and there is evidence of some recent improvements in performance. However, there is a need to ensure that these

performance levels are further enhanced and sustained. This is why the review team consider that more urgency is required in developing a series of continuous improvement initiatives in a revised and refreshed Improvement Plan.

- 8.6. In this regard, it is noted that the number of planning applications has greatly increased over the last 3 years. Covid and staff shortages have also hit in this same timeframe. The service has recently used the PAS Benchmarking Tool which identifies that in terms of planning applications, costs, resourcing and income, the service has lower costs and higher volumes of applications compared to similar authorities. This could indicate the need for additional resources. However, more work on how the service is currently functioning, alongside the collation of benchmarking data, would be required before a fully evidenced business case could be made.
- 8.7. Related to the above, the review team were concerned over the length of time of the current Improvement Plan and, particularly in the area of Development Management, the lack of any significant impact to date (although the impacts of Covid on this are noted). It should be urgently renewed and specific matters identified by the review team covered in its re-design. The Improvement Plan should form part of a wider Delivery Plan which will drive the service to a position of excellence. The Delivery Plan should contain 3 separate but related elements:
- Delivering priorities
 - Improving the service
 - Resourcing the service
- 8.8. In terms of *delivering priorities*, the findings in section 7 of this report in relation to there being insufficient knowledge of the Council's vision and ambitions are pertinent. In summary, there is urgent need for this to be addressed via a communications campaign.
- 8.9. In respect of *Improvement Planning*, in addition to the matters of the timeliness of decision making and appeal performance identified above, there are a number of other matters that would need to be addressed as part of a reinvigorated Improvement Plan (some are already identified in the existing version). The review team identified the following areas which should form part of that new document:
- Review of the use of extensions of time
 - Dedicated training for officers to support the delivery of the place making agenda
 - Consider where the responsibility for s106 and CIL rests
 - Review the approach to the pre-application service
 - Examine how PPAs could be used to better effect
 - Continue to pursue cultural change initiatives
 - Progress a more entrepreneurial approach to service delivery
 - Identify IT and digital support capacity
 - Review of governance arrangements and better over-sight of performance

It should be stressed that this is not necessarily an exhaustive list, but captures the key areas identified by the review team from the on-site work undertaken.

- 8.10. On the issue of *resources*, there is some evidence that additional investment in the service may be required. In particular, given the scale and complexity of the growth agenda in

South Gloucestershire, staffing levels in the Local Plan team may not be sufficient enough to bring the Local Plan forward in a timely matter. The recent PAS benchmarking exercise that the Service has undertaken would point to this being a wider, cross-service, issue too. However, this cannot be fully and properly assessed until the Improvement Plan has been revised and considered by the Growth Board. For example, introducing a more entrepreneurial approach to service delivery may well lead to further financial resource being available through income generating initiatives. Nevertheless, some initial pump-priming funds may be necessary to get some of these interventions off the ground. Related, any increase in planning fees that may come forward as part of the Levelling up and Regeneration Bill should be ring-fenced internally to the Service and invested in service enhancements.

- 8.11. In terms of Members, there is an appreciation from senior Councillors of the pressures that the service is under. However, there is a view that the Service should be more pro-active in identifying areas for change and be more entrepreneurial. Overall, the impression that the review team were given was that there was a respectful and supportive relationship between Members and the Planning Service. These strong foundations should be built upon as part of the governance arrangements that will be required to drive forward the new Delivery Plan.

9. Theme 3: Community engagement

9.1 Under this theme, the review team were asked to consider the following specific questions:

- *How well does the service meet the communities' needs?*
- *How well does the service engage with, listen to, and respond to different communities within South Gloucestershire?*

9.2 The review team were provided with evidence of a number of initiatives that the service has delivered to enhance community involvement in Planning and to help ensure that the needs of communities are met.

9.3 The service has assisted in the delivery of Neighbourhood Plans (3 of which have been completed) and has used innovative approaches to Local Plan consultations to make the process more digitally accessible. This has included the use of short videos and interactive online mapping which compliments the Council's e-consultation system.

9.4 As part of the Council's management of the transition to its new Local Plan, the service are addressing specific community issues through its SPD programme and via the use of regulatory powers (including the use of Article 4 Directions). This has included work to address community concerns over matters such as HMOs and guidance on the building and use of outbuildings in response to the way that people's working arrangements have been re-set as a result of the Covid pandemic.

9.5 Town and Parish Councils have an important role to play in ensuring that communities are able to effectively interact with the Planning system. The Service currently attend Town and Parish Forums when requested/when there are key messages that need to be communicated. However, in speaking with Town and Parish Council's there is a clear need for better communication and a more structured approach to engagement to help overcome the current view that communities are not properly listened to.

9.6 On the issue of communication, Town and Parish Councils raised concerns over a lack of engagement/interaction on planning applications. As conduits to the community, their concerns were seen as a fundamental break in the communication chain with the Council's residents. Consideration as to how this can be improved needs to be carefully considered. On a more detailed point, there was concern that Town and Parish Council consultation responses are not always uploaded on the planning portal in a timely manner and that they are not notified of revised plans. These are fundamental matters that require further initial investigation and then specific and urgent attention.

9.7 In addition to engagement on planning applications, Town and Parish Councils are also very keen to get involved in the early stages of master planning in their areas. There is a feeling that the current absence of such arrangements means that the die is somewhat cast before communities can effectively interact in the process. Consideration needs to be given as to how this can be effectively

addressed, perhaps alongside the Local Plan engagement arrangements that are already effectively in place.

9.8 Aside from engagement on specific applications and proposals, there is also an identified for a more pro-active and structured approach to engaging more generally with Town and Parish Councils on Planning matters and to build improved relationships with not only those bodies but with the wider community too. Two interventions are identified to assist in making this happen. First, the setting up of regular (4 monthly) Town and Parish Council Forum to enable issues of general interest and service delivery matters to be debated and discussed. Second, to work with Town and Parish Councils on the design and delivery of an annual training programme.

10. Theme 4: Partnership engagement

10.1. The review team were asked to consider the two following questions under this particular theme:

- *How do the strategic partners experience the planning service?*
- *How well is the service innovating in this area?*
- *Do potential investors understand the offer that the council is making, making South Gloucestershire an investible proposition for innovation and high-quality development?*

10.2. The Planning Service has a close working relationship with the West of England Combined Authority through a variety of co-ordinated work plans that are driving forward the Spatial Development Strategy and related work on matters including housing delivery, assets and addressing the climate emergency.

10.3. Regular liaison meetings are held with a number of key national bodies, including National Rail, National Highways and Homes England. More locally, the service has a close working relationship with Homes West, specific Housing Associations and the Bristol Property Agents' Forum.

10.4. Internally, the service highlights positive strategic relationships with areas such as Public Health, Economic Development, Regeneration, Housing and Property who also have an integral part to play in the delivery of the Council's place making and growth ambitions.

10.5. In addition to a number of the bodies referred to above, the review team also spoke with Planning Agents who regularly use the Planning service and a group of major housebuilders with land interest in South Gloucestershire. A number of strategic and more operational matters were raised.

10.6. At a strategic level, it was identified that senior management needs to work more closely with key partners and investors so that the vision for place making is better understood and delivered. Presently, the ambition for better place making, higher quality design and the delivery of a new and specific identity for South Gloucestershire is not embedded with partners. However, the review team were given a strong impression from these strategic partners that the agenda is one that they could readily subscribe to and support. There was also a clear message from these bodies of the need to ensure that the Local Plan is brought forward as quickly as possible, so as to create the necessary conditions for growth and investment.

10.7. At a more detailed level, there was a view that current pre-application and PPA processes are not effective. Indeed, delays in the pre-application service and the tendency for what are considered to be rather bland and un-insightful responses are at present a deterrent to using the system. This has a double negative effect of not enabling the service to effectively input into and shape new developments and an impact on income. Strong concerns were also expressed over delays in decision making, with a view that case officers need to be better empowered to make

decisions. The review team also sensed a reluctance to grasp the opportunities afforded by the more extensive use of PPAs, not just in terms of better coordinating planning inputs into major development and investment proposals to deliver the Council's ambitions, but also the ability to drive income from this source to re-invest in the modernisation of the service.

- 10.8. In addition, some stakeholders commented that the responsiveness of the service to queries and enquiries could be prone to delays and often required chasing. Once comments were provided however they were invariably helpful.

11. Theme 5: Achieving outcomes

11.1 Under this heading, the review team were asked to address the following key questions:

- *Is the way the service is delivered making the best of the council's combined resources?*
- *Is everybody in agreement on the priority outcomes? And are they the best possible ones?*

11.2 As has been previously identified, the Council has achieved impressive housing delivery numbers and economic investment in South Gloucestershire. Additionally, it has an excellent record in bringing forward new socially rented homes via s106 agreements and is bringing in around £20m a year through CIL receipts that are being allocated to key infrastructure projects and schemes.

11.3 The way in which the service is delivered is generally well integrated with other key functions of the Council, but needs some refinement. The inter-relationship of Planning with other services that have a critical role to play in delivering the Council's place making ambitions are either well-established (for example, with housing delivery) or are improving (for example, with property and regeneration). However, the review team consider that these key relationships could be improved further via the previously identified need for a Growth Board that will help to shape and delivery the Council's own projects in an integrated manner as well as providing strategic input into major private sector schemes.

11.4 At a senior level, the service is cognisant of the direction of the Council and the Local Plan presents an opportunity to deliver its ambitions. The service needs to embrace this opportunity and ensure that this direction of travel is fully understood across the entire service area via the various actions and interventions identified previously in this report.

12. Implementation, next steps and further support

To be discussed with South Gloucestershire Council.

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