

# Public Document Pack



## STROUD DISTRICT COUNCIL

Council Offices • Ebley Mill • Ebley Wharf • Stroud • GL5 4UB

Telephone 01453 766321

[www.stroud.gov.uk](http://www.stroud.gov.uk)

Email: [democratic.services@stroud.gov.uk](mailto:democratic.services@stroud.gov.uk)

Monday, 10 January 2022

## DEVELOPMENT CONTROL COMMITTEE

A remote meeting of the Development Control Committee will be held on **TUESDAY, 18 JANUARY 2022** in the Council Chamber, Ebley Mill, Ebley Wharf, Stroud at **6.00 pm**

Kathy O'Leary  
Chief Executive

Please Note: The meeting is being held in the Council Chamber at Stroud District Council and will be streamed live on the Council's [YouTube Channel](#). A recording of the meeting will be published onto the [Council's website](#). The whole of the meeting will be recorded except where there are confidential or exempt items, which may need to be considered in the absence of press and public.

**Due to current Covid-19 regulations a maximum of 6 members of public will be permitted in the Council Chamber at any one time, if you would like to attend this meeting please contact [democratic.services@stroud.gov.uk](mailto:democratic.services@stroud.gov.uk).**

### A G E N D A

1. **APOLOGIES**  
To receive apologies of absence.
2. **DECLARATIONS OF INTEREST**  
To receive Declarations of Interest in relation to planning matters.
3. **MINUTES**  
To approve the minutes of the meeting held on 23 November 2021.
4. **PLANNING SCHEDULE AND PROCEDURE FOR PUBLIC SPEAKING (Pages 3 - 8)**  
(Note: For access to information purposes, the background papers for the applications listed in the above schedule are the application itself and subsequent papers as listed in the relevant file.)

**4.1 SITE FOR SPORTS PITCHES NORTH OF PARCELS H10 & H11, GREAT OLDBURY (S.21/1050/REM) (Pages 9 - 28)**

Engineering works to facilitate the creation of phase 1 sports pitches and associated landscaping (approval of reserved matters under Outline permission S.14/0810/OUT).

**5. ESTABLISHMENT OF DEVELOPMENT MANAGEMENT ADVISORY PANEL (Pages 29 - 104)**

To seek the Committee's approval for the establishment of a Development Management Advisory Panel, as an officer/member working group considering matters relating to development management performance, enforcement policy and performance, and appeal performance.

**Members of Development Control Committee**

**Councillor Martin Baxendale (Chair)**

Councillor Chris Brine  
Councillor Martin Brown  
Councillor Jason Bullingham  
Councillor Helen Fenton  
Councillor Victoria Gray

**Councillor Trevor Hall (Vice-Chair)**

Councillor Haydn Jones  
Councillor Loraine Patrick  
Councillor Mark Ryder  
Councillor Lucas Schoemaker  
Councillor Ashley Smith



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## **DEVELOPMENT CONTROL COMMITTEE**

**23 November 2021**

**6.00 - 8.04 pm**

**Council Chamber**

### **Minutes**

#### **Membership**

##### **Councillor Martin Baxendale (Chair)**

Councillor Martin Brown  
Councillor Jason Bullingham  
Councillor Haydn Jones  
Councillor Loraine Patrick  
Councillor Chris Brine  
Councillor Victoria Gray

\* = Absent

##### **Councillor Trevor Hall (Vice-Chair)**

Councillor Mark Ryder  
Councillor Lucas Schoemaker  
Councillor Ashley Smith

\* Councillor Helen Fenton

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#### **Officers in Attendance**

Head of Development Management  
Head of Property Services  
Majors & Environment Team Manager  
Principal Planning Officer (Majors)

Planning Enforcement Officer  
Biodiversity Officer  
Democratic Services & Elections Officer  
Senior Lawyer, One Legal

#### **Other Member(s) in Attendance**

Councillors Ross

#### **DCC.025      Apologies**

Apologies of absence were received from Councillors Gray, Fenton and Brine.

#### **DCC.026      Minutes**

**RESOLVED** That the Minutes of the meeting held on 12 October 2021 are approved as a correct record.

#### **DCC.027      Declarations of Interest**

There were none.

## **DCC.028      Planning Schedule and Procedure for Public Speaking**

Representations were received and taken into account by the Committee in respect of Applications:

1	S.20/2098/FUL	2	S.21/1025/FUL
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## **DCC.029      Littlecombe Zone E, Lister Road, Dursley, Gloucestershire (S.20/2098/FUL)**

The Principal Planning Officer (Majors) introduced the report and explained it was for the erection of 28 dwellings which included:

- Fourteen 4-bed units.
- Six 3-bed units.
- Four 2-bed units (Affordable housing – Shared ownership).
- Four 1-bed units (Affordable housing – Social rent).

The Principal Planning Officer (Majors) informed the Committee that this was the last of the developments for the Littlecombe site and would share its access with the most recently approved Zone F. He shared the plans of the development and explained that there would be lots of informal open space which would link in with the open space throughout the rest of the development creating a biodiversity net gain. He further informed the committee that:

- The affordable housing had been designed in the same way as the private housing and the rest of the development.
- The site sat within the Littlecombe allocation from the 2005 Local plan however, due to the time of the application it was to be considered as a standalone full application.
- The Highway Authority were satisfied with the highway safety.

Councillor Cornell spoke as a ward Member for Dursley in support of the application, she stated that she originally called in this application to the Committee due to the large number of resident objections. She drew attention to the key considerations of the application which included:

- It was the largest regeneration site in the South-West.
- The river flowing through the site had been de-culverted during the previous development which supported the biodiversity net gain.
- The site had experience large disruption through the removal of earth.
- There had been a large number of objections from residents mostly due to the clearance of the site before approval.
- It was not mentioned in the report but there was a long standing proposal for a cycle/walking route from Dursley to Uley close to the site which would help promote active travel.
- After consultation the affordable housing design had been revised and is now more in keeping with the private houses and rest of the development.
- The Town Council had objected over the loss of green spaces however; this was a sustainable site for housing of which the Town has very few left.
- Were the conditions strong enough to support the application.
- Was there a biodiversity net gain and how would this be maintained and monitored in future years.

2021/22

- The affordable housing provided was under 30% therefore the developers had offered the cash alternative to provide affordable housing elsewhere.

The Principal Planning Officer (Majors) commented on the biodiversity net gain, he showed the committee the plans for the development and highlighted the undeveloped areas within the plans.

The Biodiversity Officer explained that the site had a lot of potential for biodiversity gain with the proposed wildflower meadows. They also commented that there was room for further improvement which was why they had suggested to add conditions into the landscape plan. They further spoke of the long term management of the landscape to ensure it was looked after. They explained that the Committee could ask for an annual review of the condition should they wish. The Biodiversity Officer further explained that there were 3 badger sets surrounding the site, one of which would not need to be relocated and would remain active. The other 2, within the site, would need to be closed off for development. These sets had been watched with cameras and were identified as not being in use by the badgers. She explained that they had requested a condition for the developer to gain a licence before the removal of the sets, to ensure they complied with the ecological survey. She further explained that the site before the development was mostly comprised of bramble bush which although a food source, for wildlife, did not offer much else in terms of biodiversity.

Lucy Atkins spoke in opposition of the application as a local resident. She explained she was speaking on behalf of the 29 households located opposite the site. She further explained that she worked for homes England and was objecting to the application based on the following reasons:

### 1. Principal of Development

- It was not a brownfield site, the land had not previously been developed therefore should be classed as a greenfield site.
- The site was excluded from the Littlecombe outline application.
- Residents were assured this land would not be developed.
- The application Contradicts the Dursley Neighbourhood Development Plan (NDP): Policies ES1, ES2 and Projects D&K.

### 2. Technical Matters

- The applicant had undertaken substantial ground work and vegetation removal before approval.
- A detailed ground investigation report had not been published.
- Noise, dust and vibrations were all at unacceptable levels and could not be enforced.
- Redistribution of the waste earth onto brownfield areas of the site could potentially have caused contamination issues.
- The developer's technical reports were not applied to this site.

### 3. Environmental Matters

- Tree vegetation and habitat clearance undertaken before consent where a number of protected species were known to reside.
- All clearance was undertaken before an ecological survey could be undertaken.

### 4. Urban Design

- Impact on the conservation area and public rights of way
- Proposed materials are not in keeping with the local area.

## Agenda Item 3

2021/22

Mairead Stibbs spoke in support of the application as the planning consultant for St Modwens Homes. She explained her reasons for asking the Committee to approve which included:

- The principal for development on the site was established within the wider Littlecombe site allocated for development in the previous Local Plan.
- Highly sustainable location for new housing.
- Excellent access to existing services facilities and employment opportunities.
- The site met the objectives for both local and national planning policy.
- Had secured recent approval for Zone F, adjacent to the proposed site.
- Scheme positively responded to characteristics of the surrounding area.
- The creation of a wildlife area and corridor would enhance the biodiversity opportunities.
- Around 50% of the site had been given to accessible informal open space for wildlife.
- The site provided a positive contribution to affordable housing, for which there was a high demand.
- Water and energy efficiency measures would be incorporated into the proposed dwellings.
- Infrastructure provided would allow for future electric charging points to be installed.

Councillor Jones received the following answers to his questions:

- The whole site was outline approved under the 2005 Local Plan. The subsequent hybrid application did not contain Zone E however, that did not mean it was removed from the initial outline approval. It was classed as an acceptable site for development and was submitted as a standalone application.
- The site was recognised as a green corridor within the Dursley NDP but was not designated as an open space for wildlife. This meant Officers could consider protecting the site through enhanced development with conditions to improve the biodiversity opportunities.

Councillor Ryder questioned what would happen if the conditions were not met by the developers. The Principal Planning Officer (Majors) explained they could not apply a penalty for non-compliance for the condition however, in some circumstances it could be appropriate to apply a stop notice, the main solution would be through the appropriate enforcement action.

Councillor Patrick raised concerns over the pre-commencement of work on this site.

The Head of Development Management informed the committee of the processes around enforcement. She explained the process is normally remedial as opposed to punitive. They further informed them that in many cases attempts to negotiate with the applicant needed to be taken first. If there was a clear breach, then SDC could serve a notice or a legal injunction dependant on the breach, but those actions both took time and did not show an immediate response. The Head of Development Management further explained that there were works that could be undertaken prior to planning permission which SDC would have no control over, for example; preparing the land. The Biodiversity Officer added clarification that the clearance of this site had been investigated.

2021/22

Councillor Schoemaker raised concerns with the consequences surrounding the steep slope emerging from Windsor Road towards the development. The Principal Planning Officer (Majors) stated that as this was a Civil matter and could not be considered under this application.

After a question from Councillor Brown, the Head of Development Management confirmed conditions required SDC to approve the requirements submitted by the developer before the condition could be discharged. She then drew the committee's attention to page 44, which detailed condition 4. She further explained that this included a 20-year period for the management plan which could be enforced should the developer stray from the work schedule they submit.

Councillor Ryder echoed Councillor Schoemaker's concerns regarding the liability of the steep slope bordering the site. The Head of Development Management explained that putting a condition in place would not be appropriate as it would not meet the 6 required tests. She then informed the Committee that they could put an informative to the decision notice recommending that the developer explain the liability to new occupants.

Councillor Patrick spotted an error on page 14 point 6.3.4 the summary of financial obligations related to Stonehouse as opposed to Dursley. It was confirmed that this was a mistake and should relate to provisions for Dursley.

Councillor Smith proposed the Officers advice subject to the addition of an informative note to advise the developer that 'Information packs should be provided for the home owners to explain the scope and responsibilities of the management company appointed to the development; and with particular reference to the maintenance of the engineering of the development.'

Councillor Hall Seconded.

Councillors debated the following topics:

- Pre-commencement.
- Monitoring the conditions.

After being put to a vote, the Motion was carried.

**RESOLVED To PERMIT the application subject to the addition of the informative note.**

### **DCC.030 Cambridge Avenue, Dursley, Gloucestershire (S.21/1025/FUL)**

The Majors & Environment Team Manager introduced the report to the Committee and explained it was an application for the erection of 13 new dwellings on the land of a former sheltered housing site. He drew attention to a few key points of the application which included:

- The proposed dwellings were a mix of 2 and 3 bed properties.
- The materials from the previous sheltered housing building would be reused in the new dwelling if possible, for example; the solar panels.
- There was a condition placed on the application for the materials to be approved pre-commencement.
- The frontages of each dwelling were stepped back.

The Majors & Environment Team Manager proposed to add a condition recommending that a waste minimisation plan is submitted and approved.

Councillor Cornell spoke as a ward member for Dursley in support of the application. She informed the Committee of the following points:

- The former sheltered housing site was deemed not fit for purpose in a review held in 2015. In June 2016 it was decided to keep the 4 bungalows and sell the site to the private market. In 2019 the arrangements on borrowing changed and allowed for SDC to keep the site and redevelop the site.
- One of the last places available to build Council homes in Dursley due to its close proximity with the Area Of Natural Beauty (AONB).
- Materials would be reused where possible.
- The dwellings proposed were small family houses which were in great need.
- The Town Council raised concerns over the colour and uniformity, requested a variation of colour within the plan which was agreed to be looked at. They had also raised concerns over the roofing material.
- Sustainable location.
- The nearby playground needed refurbishing as the new residents would want to utilise this.

Johnathan Headland spoke in support of the application as the agent. He explained the application was for 13 high quality affordable family homes. He further informed the Committee of the following considerations:

- A primary need for affordable 2 & 3 bed family homes had been identified in 2015/16.
- The dwellings had been designed around sustainability. The roof orientation faced the solar panels south for maximum efficiency.
- The houses would be heated with air source heat pumps which would also lower bills for future tenants.
- The proposed materials for the build offered a more sustainable approach to development.
- The alternative roof material offered significant benefits through reduced maintenance and environmental savings. It also had sealed edges which reduced the opportunity for leaks and was much lighter than conventional roofing.

Councillor Ryder asked for confirmation if the Officer was satisfied with the reverse turning points located at plot 1 & 13. The Majors & Environment Team Manager confirmed they had consulted with Gloucestershire County Council (GCC) Highways who were happy with the layout and that there was enough space for a vehicle to reverse out of all spaces.

In response to questions, the Majors & Environment Team Manager confirmed:

- The proposal showed the solar panels to be included on the roof and there would be nothing preventing the entire roof to be filled, should the technical requirements allow it.
- The valleys between the roofs would capture debris and moss as most roofs do and would require a certain amount of maintenance however, the material used on the standing seam roofs are less likely to attract moss and other such things leading to an overall lower maintenance cost.

Councillor Brown proposed and Councillor Ryder seconded.

Councillor Patrick debated the use of colours that was agreed at an earlier planning meeting with the Town Council.

Councillor Schoemaker proposed an amendment to include a variety of different roof colours in the application.

Councillor Patrick Seconded

After being put to a vote, the amendment carried with 4 votes For, 1 vote Against and 3 Abstentions.

After being put to a vote, the Motion carried.

**RESOLVED To PERMIT the application subject to the condition of a waste minimisation plan and an update to the existing materials condition to include variation in the colour of the roofing materials**

The meeting closed at 8.04 pm

Chair

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# **Stroud District Council**

## **Planning Schedule**

### **18<sup>th</sup> January 2022**

In cases where a Site Inspection has taken place, this is because Members felt they would be better informed to make a decision on the application at the next Committee. Accordingly, the view expressed by the Site Panel is a factor to be taken into consideration on the application and a final decision is only made after Members have fully debated the issues arising.

## **DEVELOPMENT CONTROL COMMITTEE**

### **Procedure for Public Speaking**

The Council encourages public speaking at meetings of the Development Control Committee (DCC). This procedure sets out the scheme in place to allow members of the public to address the Committee at the following meetings:

#### **1. Scheduled DCC meetings**

#### **2. Special meetings of DCC**

#### **Introduction**

Public speaking slots are available for those items contained within the schedule of applications. Unfortunately, it is not permitted on any other items on the Agenda.

The purpose of public speaking is to emphasise comments and evidence already submitted through the planning application consultation process. Therefore, you must have submitted written comments on an application if you wish to speak to it at Committee. If this is not the case, you should refer your request to speak to the Committee Chairman in good time before the meeting, who will decide if it is appropriate for you to speak.

Those wishing to speak should refrain from bringing photographs or other documents for the Committee to view. Public speaking is not designed as an opportunity to introduce new information and unfortunately, such documentation will not be accepted.

Scheduled DCC meetings are those which are set as part of the Council's civic timetable. Special DCC meetings are irregular additional meetings organised on an ad-hoc basis for very large or complex applications.

#### **Before the meeting**

You must register your wish to speak at the meeting. You are required to notify both our Democratic Services Team [democratic.services@stroud.gov.uk](mailto:democratic.services@stroud.gov.uk) and our Planning Team [planning@stroud.gov.uk](mailto:planning@stroud.gov.uk) by 12 noon 1 clear working day before the day of the meeting, exceptionally, the council will consider late representations if appropriate.

#### **At the meeting**

If you have registered to speak at the meeting, please try to arrive at the Council Chamber 10 minutes before the Committee starts so that you can liaise with the democratic services officer and other speakers who have also requested to speak in the same slot. Where more than one person wishes to speak, you may wish to either appoint one spokesperson or share the slot equally.

**Planning Schedule 18/01/2022****1. Scheduled DCC Meetings**

There are three available public speaking slots for each schedule item, all of which are allowed a total of **four minutes** each: -

- ✓ Town or Parish representative
- ✓ Objectors to the application and
- ✓ Supporters of the application (this slot includes the applicant/agent).

**Please note:** to ensure fairness and parity, the four-minute timeslot is strictly adhered to and the Chairman will ask the speaker to stop as soon as this period has expired.

Those taking part in public speaking should be aware of the following:

- ✓ They will be recorded and broadcast as part of the Council's webcasting of its meetings.
- ✓ Webcasts will be available for viewing on the Council's website and may also be used for subsequent proceedings e.g. at a planning appeal.
- ✓ Names of speakers will also be recorded in the Committee Minutes which will be published on the website.

The order for each item on the schedule is

1. Introduction of item by the Chair
2. Brief presentation and update by the planning case officer.
3. The Ward Member(s)
4. Public Speaking
  - a. Parish Council
  - b. Those who oppose the application
  - c. Those who support the application
5. Committee Member questions of officers
6. Committee Members motion tabled and seconded
7. Committee Members debate the application
8. Committee Members vote on the application

## Agenda Item 4

### **Planning Schedule 18/01/2022**

#### **2. Special DCC meetings**

There are three available public speaking slots for each schedule item, all of which are allowed a total of up to **eight minutes** each: -

- ✓ Town or Parish representative
- ✓ Objectors to the application and
- ✓ Supporters of the application (this slot includes the applicant/agent).

**Please note:** to ensure fairness and parity, the eight-minute timeslot will be strictly adhered to and the Chairman will ask the speaker to stop after this time period has expired.

Those taking part in public speaking should be aware of the following:

- ✓ They will be recorded and broadcast as part of the Council's webcasting of its meetings.
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**Planning Schedule 18/01/2022**

Parish	Application	Item
Eastington Parish Council	Site For Sports Pitches North Of Parcels H10 And H11, Great Oldbury Drive, Great Oldbury. S.21/1050/REM - Engineering works to facilitate the creation of phase 1 sports pitches and associated landscaping (approval of reserved matters under Outline permission S.14/0810/OUT)	1

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## Development Control Committee Schedule 18/01/2022

<b>Item No:</b>	<b>1</b>
<b>Application No.</b>	S.21/1050/REM
<b>Site Address</b>	Site for Sports Pitches North of Parcels H10 and H11, Great Oldbury Drive, Great Oldbury, Gloucestershire
<b>Town/Parish</b>	Eastington Parish Council
<b>Grid Reference</b>	379024,206579
<b>Application Type</b>	Reserved Matters Application
<b>Proposal</b>	Engineering works to facilitate the creation of phase 1 sports pitches and associated landscaping (approval of reserved matters under Outline permission S.14/0810/OUT)
<b>Recommendation</b>	Approval
<b>Call in Request</b>	As previously agreed by DCC



	<h2>Development Control Committee Schedule</h2> <h3>18/01/2022</h3>
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<b>Applicant's Details</b>	Mr E Argent Robert Hitchins Limited, The Manor, Boddington, Cheltenham, GL51 0TJ
<b>Agent's Details</b>	None
<b>Case Officer</b>	Simon Penketh
<b>Application Validated</b>	10.05.2021
<b>CONSULTEES</b>	
<b>Comments Received</b>	Biodiversity Officer SDC Water Resources Engineer Environmental Health (E) Contaminated Land Officer (E) Archaeology Dept (E) Development Coordination (E) Flood Resilience Land Drainage Sport England Eastington Parish Council Mr M Taylor - South Cotswold Group Arboricultural Officer (E)
<b>Constraints</b>	Neighbourhood Plan Eastington Parish Council Affecting a Public Right of Way Affecting a Public Right of Way SAC SPA 7700m buffer
<b>OFFICER'S REPORT</b>	

## 1. **MAIN ISSUES**

- Principle of development
- Design and appearance
- Residential Amenity
- Parking
- Landscaping
- Green Infrastructure
- Drainage

## 2. **DESCRIPTION OF THE SITE**

**2.1.** The site is made up of part of the land parcels reserved for formal recreation and provision of children's play areas. The site is located immediately to the North of housing land parcel H11. The site is part of Outline Planning Permission S.14/0810/OUT which includes consent for up to 1350 dwellings, 9.3 hectares of employment land and a mixed use local centre and new primary school.

**2.2.** The development approved under the outline planning permission is well underway with a number of residential parcels and community infrastructure consented, nearing



## Development Control Committee Schedule 18/01/2022

completion or complete and occupied. Significant infrastructure is already in place including water management, primary routes, public transport facilities, cycle and walking routes and open space facilities.

### 3. **PROPOSAL**

3.1. Approval of reserved matters layout, scale, appearance and landscaping under outline permission S.14/0810/OUT - relating specifically to land the provision of formal sports pitches. The development consists of the provision of 3 grass pitches (the first measuring approximately 60 metres by 100 metres and the remaining two pitches measuring 40 metres by 70 metres respectively), and associated landscaping. It should be noted that this stage of the proposal does not include buildings, parking or access and the application affects approximately half of the sports pitch allocation area. It is anticipated that a further application for the remaining 'sports pitches' will be submitted in due course.

### 4. **REVISED DETAILS**

4.1. Revised boundary treatments to address ecological constraints and potential for activities to result in footballs entering the public highway. Improvement to tree planting, introduction of Hornbeam Tree species and Beach Tree copse.

4.2. Access to PROW network addressed and slight realignment of pitches to allow sufficient room for the bridleway routing.

### 5. **MATERIALS**

5.1. Timber fencing and landscaping to site perimeter. Grass football/sports pitches.

### 6. **REPRESENTATIONS**

#### 6.1. **Parish/Town Councils:**

##### 6.1.1. **Eastington Parish Council**

6.1.1.1. Support the provision of the facilities at Great Oldbury but concern is raised about the layout and landscaping due to the following matters;

6.1.1.2. Highway safety - balls leaving the pitches by air or rolling down the sloping site, given the distance of around twelve metres from pitch edge to highway in some cases. This is exacerbated by the slope of the smaller pitch being 1:35 and rising to 1:15 at the carriageway edge. This is considered to cause danger on Great Oldbury Drive. There is no evidence submitted that the impacts of the layout are mitigated by ball stop fencing or the landscaping proposed. Mitigation is required to stop players running into the thoroughfare to collect stray balls.

6.1.1.3. Highway safety - parking is not provided so vehicles are likely be parked along the road during use by clubs etc.

6.1.1.4. Opportunity is missed to see the avenue of trees continue all along Great Oldbury Drive which will in turn obscure future ball stop netting and be a ball defence itself in due course. Desire also to see hedge planting between the trees to catch balls rolling off the slope.



## Development Control Committee Schedule 18/01/2022

- 6.1.1.5. The footpath at the south of the site should be adopted as PROW given that it replaces EEA24 and links to the promoted walking routes. As such this should be surfaced in hoggins rather than tarmac. Further increased tree and hedge planting will improve the rural feel of the diverted PROW EEA24 in accordance with EP9.
- 6.1.1.6. Footpath EEA24 remains blocked at present but as the houses around James Sleeman Close are now complete this temporary closure should be reopened soon by removal of fencing within the footpath.

### 6.2. External Agencies

#### 6.2.1. Sport England

- 6.2.1.1. With regard to the submitted reserved matters, Sport England would like to make the following representations: While the proposals seem in line with standard playing pitch drainage, there is no justification for it. The proposed drainage could be unnecessary, or not adequate. We would suggest an agronomist carries out a site survey and then evaluates on the drainage scheme to see if it is correct or not for the proposed use and the existing ground conditions.
- 6.2.1.2. Recommendation: Sport England wishes to object to the details submitted, for the reasons stated above.
- 6.2.1.3. Notwithstanding the above, officers have discussed the application with Sport England representatives who have confirmed that the objection does not require referral to the Secretary of State under the terms of The Town and Country Planning (Consultation) (England) Direction 2021.

### 6.3. Stroud District Council Technical Officers

#### 6.3.1. Bio-Diversity Officer

- 6.3.1.1. *Initial Comment* - The agreed outline master plan shows hedgerow planting along the Eastern boundary of the sport pitches dividing the pitches from the adjacent LEAP, however the submitted Reserved Matters plan does not show this hedge planting.
- 6.3.1.2. In order to maintain ecological connectivity within the site, SDC would recommend that the originally agreed Green Infrastructure be included in the REM plans for this phase of development, ideally the hedgerow should consist of a mixed species native hedgerow.
- 6.3.1.3. If the above revisions cannot be made Refusal should be recommended for the following reasons;

*The application does not demonstrate ecological connectivity in accordance with Local Plan ES6 and the revised NPPF. Developments should seek to enhance biodiversity by improving ecological connectivity within development sites and be designed to allow species to move unhindered throughout urban and rural landscapes.*

- 6.3.1.4 **Revised Comment** - The revised landscape plan has been amended to the suggested specification and as such the scheme is considered to be acceptable; subject to the following condition;



## Development Control Committee Schedule 18/01/2022

*A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to first occupation of the development. The content of the LEMP shall include the following:*

- a) *Description and evaluation of the features to be managed.*
- b) *Aims and objectives of management.*
- c) *Appropriate management options for achieving aims and objectives.*
- d) *Prescription for management actions.*
- e) *Preparation of work schedule (including an annual work plan capable of being rolled forward over a 20-year period).*
- f) *Details of body or organisation responsible for implementation of the plan.*
- g) *Ongoing monitoring and remedial measures.*

*The LEMP shall include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.*

*REASON: To protect and enhance the site for biodiversity in accordance with paragraph 180 of the National Planning Policy Framework, Policy ES6 of the Stroud District Local Plan 2015 and in order for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006.*

### 6.3.1 Arboricultural Officer

- 6.3.2.1 The proposed species *Pyrus calleryana* (Pear) *Prunus Avium* (Wild cherry) *Acer campestre* (Field Maple) will do little to enhance the immediate landscape or improve biodiversity. There is an opportunity to create an oak avenue adjacent to the footpath (*Quercus robur*). The proposed planting in the western corner needs to be changed to *Fagus sylvatica*. The beech trees will create a small copse at the end of the avenue.

### 6.3.2 Water Resources Engineer

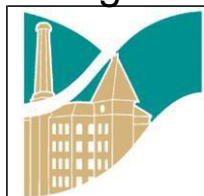
- 6.3.2.1 Confirms that the pitches have the appropriate drainage. Furthermore, the scheme is part of a much larger drainage system for the entire development, the details for which were agreed under those earlier proposals.

### 6.3.3 Contaminated Land Officer

- 6.3.3.1 Wishes to offer 'no comment'.

### 6.3.4 Environmental Health Officer

- 6.3.4.1 Works should be undertaken within our standard construction hours and with due regard to the potential for dust generation.



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### 6.4 Gloucestershire County Council Technical Officers

#### 6.4.1 Highway Authority

6.4.1.1 *Initial Comment* Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order, 2015 recommends that this application be deferred.

6.4.1.2 The justification for this decision is provided below.

6.4.1.3 The application is seeking approval of Landscaping and Layout as Reserved Matters. A Location Plan has been submitted which shows a red line site boundary which is in compliance with the approved Indicative Masterplan.

6.4.1.4 The layout of the three pitches is shown on the submitted Information Plan - Sports Pitches & POS drawing no STH.POS. FP.01 Rev A (referred to herein as the Proposed Layout) and also conforms to the Masterplan.

6.4.1.5 While, therefore, the highway authority does not seek at this stage to object to the proposals there are some important aspects which are considered not to be sufficiently demonstrated and more detailed information should be provided.

6.4.1.6 The Masterplan indicates that tree planting is to be carried out predominantly along the perimeter boundaries of the site and a building, presumably intended to provide changing facilities, is located within the southern part of the site.

6.4.1.7 While Landscaping is generally not a materially important matter in highway terms it is observed that the tree planting proposals shown on the submitted Proposed Layout are not in conformity. Given the proximity of the pitch in the southwest part of the site to Great Oldbury Drive, planting along that part of the site boundary to the south of the pitch would be very beneficial in segregating the pitch and its users from the road.

6.4.1.8 No details of boundary types have been given and it is unclear whether the site is intended to be fenced or enclosed. There would be a significant risk of errant balls reaching the road and this would be detrimental to the safety of players should they seek to retrieve the balls and of road users. Details of ball stop fencing to be erected along an appropriate length of the southern boundary of the site should be provided.

6.4.1.9 The pitches and their surrounding areas will require regular maintenance and probably less frequent future repair. The building located within the southern part of the site will also require maintenance. Such activities are likely to require some form of vehicle access but no access points have been included as part of the proposals. Details of the proposals for maintenance access should be provided.

6.4.1.10 The Highway Authority therefore submits a response of deferral until the required information has been provided and considered.



## Development Control Committee Schedule 18/01/2022

6.4.1.11 **Revised Comment** - Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order, 2015 has no objection subject to conditions and financial obligations.

6.4.1.12 The justification for this decision is provided below.

6.4.1.13 The highway authority commented on this application in its consultation response dated 6 July 2021. At that time, it recommended that a decision on the application should be deferred pending the clarification of certain matters of detail. Additional information has now been submitted in support of the application.

6.4.1.14 It was previously noted that tree and landscape planting did not seem to have been included as indicated at Outline stage and that a lack of screening along the southern boundary of the site could result in errant sports balls reaching the road, which could lead to a safety risk to users of the playing pitches as well as to road users.

6.4.1.15 The additional information confirms that landscaping would be provided along the southern boundary of the site to adequately screen the pitch from the road. The details have been shown on a submitted drawing no STH.POS.FP.01 Rev C (Information Plan).

6.4.1.16 It was further noted that the changing rooms building, the pitches and their surrounding areas would require future maintenance which would require vehicle access to the site.

Additional information has been provided on a Temporary Access Mark Up plan, using the same drawing as referenced above.

6.4.1.17 It has been confirmed that the Phase 1 works would be accessed from the northern arm of the roundabout which is also currently used for the agricultural access. Permanent access, to be dealt with under future reserved matters, would be achieved via the second phase of the sports pitches utilising the same access arrangements as the car park for the changing rooms. It is considered that these proposed access arrangements are acceptable.

6.4.1.18 Conditions;

*The proposed fencing to the southern boundary of the site shall be erected prior to the first operational use of the sports pitches.*

*Reason: To prevent any incursion into the adjacent road and in the interests of safety*

*The temporary vehicle access arrangements shall be made available prior to the first operational use of the sports pitches.*

*Reason: To ensure that a suitable means of access to the development would be available and in the interests of safety*



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#### **6.4.2 County Archaeologist**

6.4.2.1 Archaeological evaluation has been carried on two occasions, in 2013 and 2020. The reports on both archaeological evaluations carried out in the area of the proposed sport pitches (this application) recorded no significant archaeological remains.

6.4.2.2 On the basis of the results of archaeological evaluation I recommend that no archaeological investigation is required in the area covered by this revised matters application.

#### **6.4.3 Lead Local Flood Authority LLFA**

6.4.3.1 The LLFA recommend that this information is suitable to satisfy the reserved matters for this development from the perspective of flood risk management.

NOTE 1: The Lead Local Flood Authority (LLFA) will give consideration to how the proposed sustainable drainage system can incorporate measures to help protect water quality, however pollution control is the responsibility of the Environment Agency

NOTE 2: Future management of Sustainable Drainage Systems is a matter that will be dealt with by the Local Planning Authority and has not, therefore, been considered by the LLFA.

NOTE 3: Any revised documentation will only be considered by the LLFA when resubmitted through [suds@gloucestershire.gov.uk](mailto:suds@gloucestershire.gov.uk) e-mail address. Please quote the planning application number in the subject field.

#### **6.5 Other Interest Groups**

##### **6.5.1 The Ramblers Association**

6.5.1.1 No objection. Recommend that the new footpaths proposed be added to the PROW network

#### **6.6 Public**

6.6.1 Three sets of comments have been received. Two of the comments are made in support and one makes a neutral stance. The comments raise the following points for consideration;

6.6.2 The proposed footpaths should be finished in a suitable surface to provide access to wheelchair users, push chairs and children's scooters

6.6.3 Consideration should be given to the use of the pitches for a wider range of sports other than for just football.

6.6.4 A skate park should be considered

6.6.5 Parking should be provided



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- 6.6.6 Introduction of wild flower meadows and improved ecology
- 6.6.7 Lighting should be considered to extend the playing time without compromising residential amenity.
- 6.6.8 Lighting should not occur at night/dusk in the interest of wildlife habitat and grazing livestock.
- 6.6.9 Litter bins should be provided
- 6.6.10 The opportunity to provide safe horse riding and multi user routes should be taken on the associated PROW network

## **7 NATIONAL AND DEVELOPMENT PLAN POLICIES**

### 7.1 National Planning Policy Framework July 2021

### 7.2 Adopted Local Plan; Stroud District Local Plan (adopted) 2015.

#### *Strategic Objectives and Allocations*

- SA2 Site Allocation Land West of Stonehouse
- SO1 Accessible Communities
- SO4 Transport and Travel
- SO5 Climate Change and Environmental Limits

#### *Core Policies*

- CP1 Presumption in favour of Sustainable Development.
- CP2 Strategic Growth and Development Locations
- CP3 Settlement Hierarchy.
- CP4 Place Making

#### *Core Policies - Homes and Communities*

- CP6 Infrastructure and Developer Contributions
- CP7 Lifetime Communities
- CP8 New Housing Development
- CP14 High Quality Sustainable Development

#### *Delivery Policies - Homes and Communities*

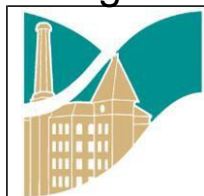
- HC1 - Residential Development in Urban Areas

#### *Delivery Policies - Economy and Infrastructure*

- EI11 Promoting Sport, Leisure and Recreation
- EI12 Promoting Transport Choice and Accessibility.
- EI13 Protecting and Extending our cycle routes

#### *Delivery Policies - Environment and Surroundings*

- ES3 Maintaining Quality of Life Within Our Environmental Limits
- ES4 Water Resources, Quality and Flood Risk



### **Development Control Committee Schedule 18/01/2022**

ES6 Biodiversity and Geodiversity

ES7 Landscape Character

ES8 Trees and Hedgerows and Woodlands ES10 Valuing Historic Environment and Assets ES12 Better Design of Places.

ES14 Provision of Semi-Natural and Natural Green Space with New Residential Development

ES15 Provision of Outdoor Play Space

#### **7.3 Eastington Neighbourhood Development Plan (2019)**

EP1 Sustainable Development

EP2 Protect and Enhance Biodiversity and the Natural Environment.

EP4 Siting and Design of New Development and Conservation.

EP8 Traffic and Transport

EP9 Public Rights of Way and Wildlife Corridors

#### **7.4 County Level Development Plan**

Gloucestershire Local Transport Plan (2020 to 2041)

Minerals Local Plan (2018 to 2032)

#### **7.5 Other relevant documents**

Stroud District Open Space and Green Space Infrastructure Study (June 2019)

Stroud District Playing Pitch Strategy (June 2019)

Planning Obligations Supplementary Planning Document (July 2017)

Stroud District Landscape Assessment Supplementary Planning Guidance (November 2000).

Stroud District Residential Design Guide Supplementary Planning Guidance (November 2000).

Stroud District Residential Development Outdoor Play Space Provision Supplementary Planning Guidance (November 2000).

### **8 PRINCIPLE OF DEVELOPMENT**

8.1 Approval of reserved matters layout, scale, appearance and landscaping under outline permission S.14/0810/OUT - relating specifically to land the provision of formal sports pitches. The development consists of the provision of 3 grass pitches (the first measuring approximately 60 metres by 100 metres and the remaining two pitches measuring 40 metres by 70 metres respectively), and associated landscaping. It should be noted that this stage of the proposal does not include buildings, parking or access and the application affects approximately half of the sports pitch allocation area. It is anticipated that a further application for the remaining 'sports facilities' will be submitted in due course.

8.2 The application site is part of land identified for strategic growth under policy SA2 (Land West of Stonehouse) of the Stroud District Local Plan (November 2015). Subsequently, outline planning permission was granted under application S.14/0810/OUT (14th April 2016)



## Development Control Committee Schedule 18/01/2022

comprising up to 1350 dwellings, employment development and a mixed use local centre and new primary school. Development of the site as a whole is well under way.

- 8.3 The Master Plan for this area of the development was approved against condition 46 of the outline planning permission - and this includes the site subject of this application and is part of the broad layout of the main recreational facilities to support the new neighbourhood. This is to be located to the immediate north of the main spine road and land parcels H10 and H11 and to the West of parcel H13. These facilities will provide five formally laid out sports pitches, associated buildings as well as a Local Equipped Area for Play (LEAP) and a Neighbourhood Equipped Area for Play (NEAP).
- 8.4 The application details a proposal for the provision of 3 grass pitches (the first measuring approximately 60 metres by 100 metres and the remaining two pitches measuring 40 metres by 70 metres respectively), and associated landscaping. This proposal covers approximately half of the main recreational facilities set out in the approved master plan. It represents the initial phase of the sports pitch provision and does not include buildings, LEAP/NEAP or permanent vehicular access/parking at this stage.
- 8.5 The application under consideration is consistent with the development parameters set out in the approved master plan and as such the principle of the proposed development is established. This application seeks approval for layout, scale, appearance and landscaping (reserved matters) for the first phase of the recreational facilities. The development would provide appropriate means for recreation associated with the wider development as well as the wider district area. Accordingly, officer attribute insignificant weight in favour of this proposal is attributed to this factor. The assessment of this application should only consider those matters and issues pertinent to them. The assessment is set out in detail below.

## 9 **PROCEDURAL MATTERS**

- 9.1 As part of the assessment of the application, the Local Planning Authority has consulted Sport England given the nature of the proposal. Sport England have raised specific points about the drainage of the site which will be addressed further in this report.
- 9.2 The Town and Country Planning (Consultation) (England) Direction 2021; Part 7 (b) and Part 10 sets out the specific occasion where, in the event that the Local Planning Authority is minded to approve development affecting existing playing field it should first consult the Secretary of State (for Housing, Communities and Local Government).
- 9.3 Specifically, this requirement is triggered in the event that Sport England (as the statutory consultee) objects to proposed development on the grounds that it would result in the loss of and/or deficiency in playing field provision and the loss is not adequately mitigated.
- 9.4 Whilst the comment from Sport England have indicated an 'objection' to the proposed development on the grounds raised, officers are satisfied that this response does not trigger a referral to the Secretary of State. This is because the proposed development details the construction of new playing field facilities and does not result in any loss on site or elsewhere.



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9.5 Accordingly, officers are satisfied that it is not necessary to refer the application to the Secretary of State in the event that the Local Planning Authority is minded to approve it. It is of note that Sport England has confirmed that it agrees with this position.

### 10 LOCAL CHARACTER, DESIGN AND APPEARANCE

- 10.1 The existing site consists of an area of land that rises to the North of the existing spine road. The site is former agricultural land set aside for the construction of the pitches. Development is well underway across the site and there is a substantial amount of new urban development in place to the immediate south. Whilst the site currently appears as an open field (being former agricultural land) the character of the site is now generally urban. For the purpose of the assessment of this application, the proposal should be considered in the context of the edge of the emerging new neighbourhood; rather than a purely rural context.
- 10.2 The proposed development would result in the regrading of the topography of the site in order to provide flat playing surfaces. In general terms the existing levels would be raised in varying amounts across the site. The highest raising would be up to approximately 0.7 metres. The West, East and North edges of the regrading being formed by 1 in 3 (gradient) batters (or banking). The highest batter is approximately 0.7 metres high.
- 10.3 Whilst the development would increase the height of the land viewed from the south (from the spine road), the new contours would be very similar and the over increase in height relatively modest (up to 0.5 metres). There would be a batter of approximately 0.2 metres along the southern edge of the southwest corner of the pitches. Officers are satisfied that the appearance of the land raising from key views (along the spine road) would be modest. As part of the development, landscaping and tree planting (Hornbeam) would be introduced along the spine road elevation running east to west along the southern boundary of the site. This is made up of a mix of native mix hedging and native tree planting. Further tree planting (Beech Copse) and wildflower meadow is proposed to be introduced into the western area of the site (between the pitches and the spine road) as well as the northern part of the site adjacent to the edge of the new neighbourhood. This arrangement is considered to adequately address the issues raised by the Arboricultural Officer.
- 10.4 Having regards to the above, officers are satisfied that the proposed sports pitches can be provided in a manner that is consistent with the sub-urban character of the emerging new neighbourhood. iModerate weight in favour of this proposal is attributed to this factor.

### 11 ARCHAEOLOGY & HISTORIC ENVIRONMENT

- 11.1 The Gloucestershire County Archaeologist has confirmed that there is no archaeological interest affected by the proposed development. Accordingly, officers are satisfied that the development is acceptable in that regard.



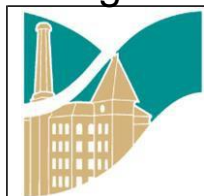
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### 12 ENVIRONMENTAL ISSUES

- 12.1 *Ecology* - The Stroud District Council Biodiversity Officer has considered the proposed development in the context of ecological constraints associated with the application site. In this instance, officers are satisfied that the development is acceptable in ecological terms, subject to appropriate planning conditions. The Biodiversity Officer has suggested specific conditions/planning obligations are attached in the event of the approval of this application that secure an appropriate Landscape and Ecological Management Plan (LEMP). The development would provide appropriate hedgerow planting and ecological areas so as to maintain a high standard of ecological connectivity through the site and so linking with other ecological mitigation associated with the wider development. This is in compliance with the wider development master plan and as such imoderate weight in favour of this proposal is attributed to this factor. For the avoidance of doubt, it is not proposed to install flood lighting at the development. However, in order to ensure that the impact of flood lighting can be properly assessed and controlled by the Local Planning Authority, an appropriately worded condition can be applied in the event of the approval of this application.
- 12.2 *Drainage/Hydrology* - The site is within Flood Zone 1 and as such is not itself at risk from flooding. The Lead Local Flood Authority has confirmed that the proposed drainage engineering is acceptable. These measures can be secured via an appropriately worded planning condition in the event that this application is approved. Accordingly, officers are satisfied that the development would provide acceptable surface water drainage. iNeutral weight is attributed to this factor.
- 12.3 *Arboriculture* - The application site does not contain any individual or grouped Tree Preservation Orders. Whilst the land is criss-crossed by hedging including hedgerow trees, the site subject of this application is devoid of existing trees. The proposed development includes landscaping that would introduce new hedging and trees. New trees (Hornbeam) would be provided along the spine road elevation of the site - so as to provide and tree lined route. Trees would also be provided within the site in the form of a Beech copse so enhancing the arboricultural benefit of the site and the surrounding locality. i weight in favour of this proposal is attributed to this factor.
- 12.4 *Ground Conditions* - The Contaminated Land Officer has confirmed that there are no specific contamination issues associated with the site or the development of the football pitches generally. *Neutral* weight is attributed to this factor.
- 12.5 *Waste Management* A relatively large volume of earth (inert waste) would be required to construct the pitches and make the ground flat for that use. Waste from the wider development has been retained for use within the site for this purpose, effectively recycling inherit waste within the development itself. This is considered to be an appropriate method for the construction of the pitches and sustainably sourced. *Neutral* weight is attributed to this factor.

### 13 HIGHWAY IMPACT AND ACCESSIBILITY

- 13.1 At this stage the development would not provide permanent vehicular access/parking. Access to the site would be from the spine road via the existing roundabout junction and associated spur. Temporary access arrangements would be installed as part of the



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proposal. Specific and permanent access and parking provision will form part of further recreational development on the adjacent land to the East and is anticipated to be subject to a further planning application in due course. This would utilise the same roundabout. The Highway Authority has acknowledged this phasing and have confirmed that this is acceptable in this instance.

- 13.2 The Highway Authority is also satisfied that the development is such that it would prevent intrusion of footballs onto the highway; and, that the development would not result in a negative highway safety impact. Accordingly, officers are satisfied that the proposed development is acceptable in highway safety terms. *Neutral* weight is attributed to this factor.
- 13.3 The proposed development includes provision for footpaths through the site (along the perimeter of the site) that is consistent with the routing of the public rights of way shown on the masterplan associated with the outline planning permission. These are to be made available for adoption as Public Rights of Way by Gloucestershire County Council (Highway Authority). The existing Public Right of Way running to the immediate East of the application site is to be retained (and will continue to be so as part of any further application for the next phase of the formal recreation areas).
- 13.4 Local residents have suggested that the footpaths and PROW's are provided on a 'multi-user basis; including horse riding uses. It should be noted that the application site does not include a bridle way route. However, the proposals shows that the new foot paths would be provided as a 'grass walkway' along the South and West boundary and as a 'hogging' surface along the North boundary of the site. The exact method for surfacing is a matter for Gloucestershire County as part of any adoption process. The nearest official bridleway is situated due East of the formal recreation parcel and is adjacent to residential parcel H14. This is not affected by this proposal. Accordingly, officers are satisfied that the proposed development would provide adequate access to the PROW network in accordance with the outline planning permission. *Moderate* weight in favour of the proposal is attributed to this factor.

## 14 **RESIDENTIAL AND GENERAL AMENITY**

- 14.1 As noted earlier in this report, the original outline planning permission allocates the subject parcel of land to the provision of sports pitches/facilities. Its location and use is therefore established in principle. Notwithstanding this, the wider development includes substantial areas of new residential development and in particular residential land parcels H10, H11, H13 and H14 are adjacent to the South and East of the recreational area associated with this application.
- 14.2 In respect of this phase of the recreational development, the residential parcels at H10 and H11 are most affected. These are separated from the development by the spine road running West to East. Whilst there would be noise associated with the sports activities on the development, the use of this land is considered to be compatible with the wider residential nature of the new neighbourhood allocation. This application does not include flood lighting, and a suitably worded condition on any approval of this application will ensure that any future proposals to consider such installations can be



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properly considered by the Local Planning Authority (in conjunction with the Environmental Health Officer). It is not anticipated that the use of the sports pitches would introduce significant levels of noise resulting in an unacceptable impact upon the amenity of nearby dwellings; and any activity is likely to be confined to daytime hours. Accordingly, it is considered that the development would not result in an unacceptable impact upon the amenity of the locality; and, that appropriate control and legislation is available to enforce against unlikely occasions where noise (or light) nuisance may occur.

- 14.3 Accordingly, officers are satisfied that the proposed development is acceptable in this regard. *Neutral* weight is attributed to this factor.

### 15 **OTHER MATTERS**

- 15.1 Local residents have suggested that the area includes a skate park. In this instance the land parcel is designated for formal recreation and is to be laid out as sports pitches. A similar arrangement is approved in principle for the adjacent land (phase 2) of the formal recreation area. However, the second phase would also provide Neighbourhood and Local Equipped Area for Plan (NEAP and LEAP). These do not generally include the provision of a skate park and as such officers do not consider that this is achievable as part of this planning application.

### 16 **CONCLUSION AND THE PLANNING BALANCE**

- 16.1 The proposed development is consistent with the wider masterplan for the new neighbourhood; and that approved under the outline planning permission. The proposed development would provide the first phase of formal recreational infrastructure to meet the needs of the new neighbourhood and wider district. Officers attribute significant weight in favour to this factor.
- 16.2 Officers are satisfied that the proposed development would not lead to an unacceptable impact in highway safety terms of in terms of the amenity of the surrounding residential areas. Officers are also satisfied that the development can provide appropriate landscaping and ecological mitigation consistent with the masterplan for the development.
- 16.3 Accordingly, officers consider that the benefits of the proposed development are not outweighed by any negative impact and as such the proposed development should be approved.

### 17 **HUMAN RIGHTS**

- 17.1 In compiling this recommendation, we have given full consideration to all aspects of the Human Rights Act 1998 in relation to the applicant and/or the occupiers of any neighbouring or affected properties. In particular regard has been had to Article 8 of the ECHR (Right to Respect for private and family life) and the requirement to ensure that any interference with the right in this Article is both permissible and proportionate. On analysing the issues raised by the application no particular matters,



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other than those referred to in this report, warranted any different action to that recommended.

### 18 **RECOMMENDATION**

- 18.1 That reserved matters consent is approved subject to the conditions set out in this report.

#### **Subject to the following conditions:**

#### 1. Plans

The development shall proceed strictly in accordance with the details shown on the following drawings;

273-SP PH1-300                      Construction Details

As received by the Local Planning Authority on 26th April 2021

STH.POS.AP.1 (Rev A)              Site Location Plan

as received by the Local Planning Authority on 10th May 2021

STH.POS.FP.01 (Rev D)              Proposed Site Layout  
273-SP PH1-100 (Rev A)              General Engineering  
273-SP PH1-210 (Rev A)              Cross Sections

as received by the Local Planning Authority on 23rd November 2021

Reason: For the avoidance of doubt

#### 2. LEMP

Prior to the first use of the development hereby permitted, a landscape and ecological management plan (LEMP) shall be submitted to approved by the Local Planning Authority. The content of the LEMP shall include the following:

- a) Description and evaluation of the features to be managed.
- b) Aims and objectives of management
- c) Appropriate management options for achieving aims and objectives
- d) Prescription for management actions
- e) Preparation of work schedule (including an annual work plan capable of being rolled forward over a 20-year period)



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- f) Details of body or organisation responsible for implementation of the plan.
- g) Ongoing monitoring and remedial measures.

The LEMP shall include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To protect and enhance the site for biodiversity in accordance with paragraph 180 of the National Planning Policy Framework, Policy ES6 of the Stroud District Local Plan 2015 and in order for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006.

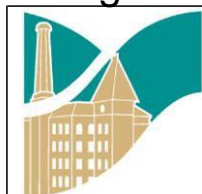
### 3. Provide Landscaping

The landscaping detailed in drawing number STH.POS. FP.01 REV D (as received by the Local Planning Authority on 23rd November 2021) shall be implemented no later than the first planting season following the first occupation of the development hereby approved. Thereafter the development shall be retained as such and the landscaping shall be maintained in accordance with the details set out on the drawing and the Landscape Environmental Management Plan as referred to in condition 2 of this planning permission.

Reason: In the interest of landscape and visual amenity and to ensure that the agreed landscaping is adequately maintained and to accord with policy ES7, ES8 and CP14 of the Stroud District Local Plan (adopted) November 2015.

### 4. No Flood Lighting

No flood lighting shall be installed on the sports pitches hereby approved until details of such lighting (including times of operation) has been submitted to and approved by the Local Planning Authority. Thereafter the development shall proceed in accordance with the agreed details and retained as such.



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Reason 1: In order to ensure that there is no exceedance of the vertical illuminance levels at neighbouring residential properties that are recommended for Environmental Zone 3 by the Institution of Lighting Professionals in its "Guidance Note 01/21 - The Reduction of Obtrusive Light"; and, in the interest of residential amenity and to comply with policy ES3 of the Stroud District Local Plan (adopted) November 2015

Reason 2: In order to maintain dark corridors for nocturnal wildlife in accordance with Policy ES6 and CP8 of the Stroud District Local Plan (adopted) 2015.

5. No fencing other than shown on plans

No fencing other than that show on drawing numbered STH.POS.FP.01 REV D (as received by the Local Planning Authority on 23rd November 2021) shall be installed at any time.

Reason: In the interest of landscape and visual amenity and to ensure that the agreed landscaping is adequately maintained and to accord with policy ES7, ES8 and CP14 of the Stroud District Local Plan (adopted) November 2015.

6. Temporary Access provided

Prior to the first use of the development hereby permitted, temporary vehicular, pedestrian and cycling access shall be provided in accordance with the details shown upon the drawing entitled 'Temporary Access Plan' as received by the Local Planning Authority on 1st October 2021.

Reason: To ensure that appropriate temporary access measures are installed for the first phase of the formal public open space provision, and; in the interest of highway safety and amenity and to accord with Policy CP8 of the Stroud District Local Plan (adopted) November 2015.

Informatives:

1. ARTICLE 35 (2) STATEMENT - The case officer contacted the applicant/agent and negotiated changes to the design that have enhanced the overall scheme.
2. Please note that if consent is granted, the applicants are informed that this does not absolve them from complying with the relevant law protecting species, including obtaining and complying with the terms and conditions of any licenses required. All bat species are



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protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Legal protection covers bats and elements of their habitats. A European Protected Species licence is required in order to allow prohibited activities, such as disturbing bats or damaging their breeding sites or resting places, for the purposes of this development

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## STROUD DISTRICT COUNCIL

## DEVELOPMENT CONTROL COMMITTEE

TUESDAY 18<sup>TH</sup> JANUARY 2022

<b>Report Title</b>	<b>Establishment of Development Management Advisory Panel</b>			
<b>Purpose of Report</b>	To seek the Committee's approval for the establishment of a Development Management Advisory Panel, as an officer/member working group considering matters relating to development management performance, enforcement policy and performance, and appeal performance.			
<b>Decision(s)</b>	<b>Development Control Committee RESOLVES to:</b>  <b>a) Establish the Development Management Advisory Panel;</b> <b>b) Approve the draft Terms of Reference for the proposed new Panel, attached as Appendix A;</b> <b>c) Review the operation of the Panel within the next 12 months.</b>			
<b>Consultation and Feedback</b>	The proposal and draft Terms of Reference have been discussed with the Council's Strategic Director of Place and result from a recommendation from an internal audit report.			
<b>Report Author</b>	Geraldine LeCointe, Head of Development Management Tel: 01453 754233 Email: <a href="mailto:geraldine.lecointe@stroud.gov.uk">geraldine.lecointe@stroud.gov.uk</a>			
<b>Options</b>	The option of not establishing the Panel has been considered. This is not recommended because it would not facilitate the ability of the Council to more readily oversee the performance of the service.			
<b>Background Papers</b>	None			
<b>Appendices</b>	Appendix A – Draft Terms of Reference for Development Management Advisory Panel. Appendix B – Planning Applications Appendix C – Planning Review (Enforcement) Report			
<b>Implications (further details at the end of the report)</b>	Financial	Legal	Equality	Environmental
	No	Yes	No	No

## 1. BACKGROUND

- 1.1 The Development Management service has been the subject of two recent internal audit service reports: 'Planning Applications' and 'Planning Review (Enforcement)', both of which were considered by Audit & Standards at its meeting on 30<sup>th</sup> November 2021. The reports were accepted with some further supplementary information requested for both to be reported to Audit and Standards Committee in 2022.
- 1.2 Both internal audit reports are attached in full to this meeting's agenda for information.
- 1.3 The Constitution sets out that the Development Control Committee has responsibility for discharging the follow functions: "Statutory development and planning control and public rights of way".

## Agenda Item 5

- 1.4 The first recommendation in the enforcement service audit report [No.1(M)] stated “Procedures should be reviewed and clarified to ensure that Member oversight of the revised Council Planning Enforcement Policy and Procedure is sufficiently defined”. To address this, this report proposes the establishment of a Development Management Advisory Panel, an officer/member working group responsible to the Development Control Committee.

### **2. THE PROPOSED DEVELOPMENT MANAGEMENT ADVISORY PANEL**

- 2.1 The proposed new Development Management Advisory Panel will act as an officer/member working group reporting, as necessary, to Development Control Committee. It will consider matters of service performance and improvement, including enforcement and appeals.
- 2.2 The proposed working group aligns with the Constitution’s ‘Performance Reporting Arrangements’ which states that “Any two members of each committee will meet on a quarterly basis with senior management teams in non decision-making informal meetings. These members will then report back to committees on an exception basis to report highs and lows.”
- 2.3 The proposed new Panel’s role, membership and reporting arrangements are provided within the draft Terms of Reference attached at Appendix A.

### **3. IMPLICATIONS**

#### **3.1 Financial Implications**

There are no financial implications directly arising from this report

Jon Coldridge, Principal Accountant

Tel: 01453 754030 Email: [jon.coldridge@stroud.gov.uk](mailto:jon.coldridge@stroud.gov.uk)

#### **3.2 Legal Implications**

The Panel will have no decision-making powers and there are no significant legal implications arising directly in respect of this report. Members of the Panel will however, need to be mindful of any bias/pre-determination issues when for example discussing any appeal decisions and their implications.

Cheryl Lester, One Legal

Email: [Cheryl.Lester@onelegal.org.uk](mailto:Cheryl.Lester@onelegal.org.uk)

#### **3.3 Equality Implications**

An EIA is not required because there are no any specific changes to service delivery proposed within this decision. However, equality impact assessments may be carried out in the future, based on activities and recommendations of the proposed Panel.

#### **3.4 Environmental Implications**

There are no significant environmental implications at this time, arising from a decision to establish a Panel. However, any future activities of the proposed Panel which may have environmental implications will be assessed at the appropriate time.

**Development Management Advisory Panel**  
**Terms of Reference (Draft)**

**Purpose**

The Development Management Advisory Panel will act as an officer and member working group having a strategic oversight of matters relating to the development management service. The Development Control Committee has responsibility for discharging the planning control function.

**Functions**

The Panel will carry out the following functions:

- Provide a forum for discussing the service's performance, KPI's and statistics, and the resources available in carrying out its function;
- Having an oversight of development management service policies (excluding strategic planning policies), including enforcement;
- To review planning appeal decisions and their implications;
- Provide a forum for discussing national and local challenges facing the service;
- Highlight relevant changes to planning legislation/procedure.

**Membership**

The Head of Development Management will chair the Panel and membership of this officer/member working group will be as follows:

Elected Members

The Chair of Development Control Committee shall be a member and nominate three further elected members from the Committee to the Panel; those Members having appropriate training and experience.

Officers

Officer members of the Panel will comprise:

- Head of Development Management
- Development Team Manager

## Agenda Item 5

### Appendix A

- Majors and Environment Team Manager
- Planning Team Leaders and other officers will attend as required

#### **Confidentiality**

The Panel's meetings will be confidential.

#### **Meeting Frequency and Papers**

The Panel will meet on a quarterly basis. Meetings may be held more often should the need arise, or be cancelled if there is not sufficient business, by agreement with the Chair of the Panel, in consultation with the Chair of DCC.

Agendas and supporting papers will be circulated in a timely manner, ideally one week in advance of any meeting.

#### **Reporting Back to Development Control Committee**

The Head of Development Management will report back to Development Control Committee, where appropriate. The Panel will have no decision-making powers and any matters requiring decision will be taken by Development Control Committee or the Head of Development Management.

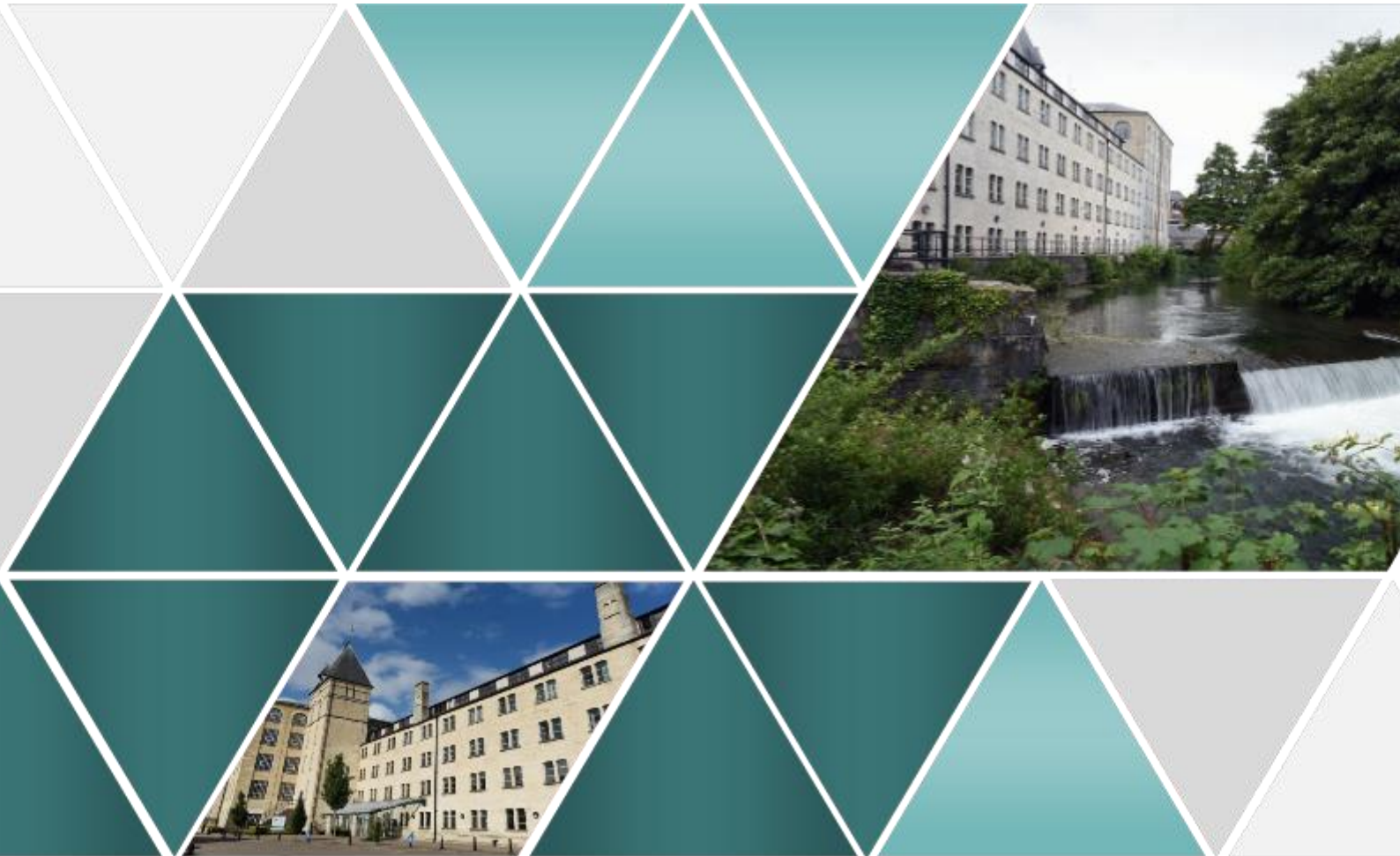
The Development Control Committee will continue to see bi-annual performance figures for the service in the spring and autumn.

09/12/21

# Planning Applications

19<sup>th</sup> November 2021

Samantha Savory - Senior Auditor



# Agenda Item 5

## Appendix B

### Distribution

To: Geraldine LeCointe, Head of Development Management

Copied to: Brendan Cleere, Strategic Director of Place  
Andrew Cummings, Strategic Director of Resources  
Griffith Bunce, Development Team Manager  
Sarah Turner, Senior Policy and Governance Officer  
Marie Parkington, Information Governance Officer

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### Important

Stroud District Council's Internal Audit service conforms to the International Standards for the Professional Practice of Internal Auditing.

The information contained within this Internal Audit report is confidential and personal data herein is subject to data protection legislation.

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Gloucestershire County Council accepts no liability to any third party for any loss or expense arising from their reliance on any part of this report.

## 1. Executive Summary

### 2. Introduction

- 2.1 Stroud District Council (the Council) is the area's local planning authority. Development Management is a statutory regulatory service. It has a duty to carry out specific functions such as determining whether planning and other related applications are suitable and in accordance with local and national policy. National government is keen to ensure continuing improvement in the planning system, and measures the Council's performance on the speed and quality of decisions on applications for Major, Minor and Other developments.
- 2.2 The actions of the Development Management service are governed by the Town and Country Planning Acts, National Planning Policy Framework, Planning Practice Guidance, and the Council's Constitution. Decisions must be made in accordance with the Stroud District Local Plan 2015 unless other material planning considerations indicate otherwise. Planning and other related applications must be made in accordance with legislation contained within the:
- i. Town and Country Planning (Development Management Procedure) (England) Order 2015;
  - ii. Town and Country Planning (General Permitted Development) (England) Order 2015;
  - iii. Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) 2012 (as amended); and
  - iv. Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 2.3 Planning applications have a statutory determination regulatory period dependant on the type of development. For Major developments this is 13 weeks (unless an application is subject to an Environmental Impact Assessment, in which case a 16-week limit applies). And eight weeks for Minor and Other developments. Prior notifications, prior approvals, and other types of applications may be subject to shorter determination periods
- 2.4 Planning applications are documented and processed onto the Idox Enterprise for Uniform System (Uniform).
- 2.5 The number of planning applications are increasing per year, as detailed below:<sup>1</sup>
- 1<sup>st</sup> April 2021 to 15<sup>th</sup> October 2021 (date of audit): 1,626;  
1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021: 2,897; and  
1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2020: 2,736.

### 3. Audit Scope

- 3.1 To review the effectiveness of the arrangements for accepting, validating, and determining planning applications for Major, Minor and Other developments, to ensure these are recorded and processed with:

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<sup>1</sup> Figures exclude pre-application advice

# Agenda Item 5

## Appendix B

- i. Decisions being made within the statutory determination period; and
- ii. Planning conditions are discharged in a timely manner.

- 3.2 Adequate performance management and reporting arrangements are in place and these are operating effectively.
- 3.3 This review commenced in March 2020, but delivery was halted during the period March 2020 to December 2020 due to the pandemic. The audit was picked up again with the aim of reporting the outcome to the Audit and Standards Committee at the next committee meeting following the end of the 2020/2021 financial year.
- 3.4 During the end of the fieldwork stage of this review, the Audit and Standards Committee requested Internal Audit to undertake an objective and independent review of the Planning Enforcement Service. As part of the development of the terms of reference for that review, Internal Audit undertook a series of consultation meetings with officers and Members. These included those identified by the Audit and Standards Committee, and others identified as the planning engagement process progressed. The principles of the issues raised around three key themes: decision making, record keeping, and communications respective to the scope of this review have been considered. And in doing so, our focus being placed on forward-looking, offering opportunities to strengthen the current arrangements and drive service improvements.

### 4. Key Findings

- 4.1 The service is performing highly against the national performance metrics for determining planning applications. Calculated over a 24-month period from July 2019 to June 2021 the Government's published figures show:
- i. 94% of decisions for major developments being made within the statutory determination periods; and
  - ii. 94.7% of decisions for non-major developments being made within the statutory determination periods.
- 4.2 Performance management information is presented every six months to the Strategic Director of Place, the Development Control Committee, Environment Committee, and all Members.
- 4.3 There is the opportunity for the service to strengthen its arrangements for management oversight through:
- i. Formalising the quality assurance process for two of the key stages, accepting and validating applications;
  - ii. Future consideration for a single repository or digital platform for all communication flows; and
  - iii. Further development of service performance metrics.
- 4.4 Whilst some risks are captured and monitored, the service should review the inherent key risks and the internal controls in place to mitigate these in respect of the end-to-end process for administering and determining planning applications.

- 4.5 The process for accepting, validating, and determining planning applications is captured at a high level in the form of a flowchart. The end-to-end process, including procedures, roles, and responsibilities should be formally documented in a Procedures Manual. This document should also define the arrangements for retention of key documents and communications.
- 4.6 Issues were identified within the Validation process that impair consistency of process, record keeping and the gathering of compliance information for determination, and the transparency of the internal audit trail. Two of these stem from system issues within Uniform.
- 4.7 The Council is currently running a project to review and develop Corporate Standards for Customer Service. This will provide an opportunity for the Council to consult both internally and with Members, and to engage with the community to enhance and develop these standards. The Development Management service aim to implement these in accordance with the corporate rollout.
- 4.8 There is an opportunity for management to explore potential options for improving the level and timeliness of responses from internal and external statutory and non-statutory consultees. It is noted that the Council has a greater opportunity to influence the timeliness of responses from internal consultees whilst this would be more difficult for external consultees.
- 4.9 The Council's website provides comprehensive guidance to ensure relevant information is accessible to the public. It also provides a search facility of historical applications and decision notices. Adoption of a Development Management Charter would further support transparency of the service offer, service standards, and management of public and consultee expectations.
- 4.10 Audit testing confirmed full compliance with the expected control environment and a high level of performance against national metrics for determining planning applications as follows:
- i. From a review of all 411 planning applications received between 1<sup>st</sup> April 2021 and 30<sup>th</sup> June 2021 that had a planning application number ending with either FUL, HHOLD, COU, ADV, LBC, TEL or CPE<sup>2</sup> it was found that parish and town councils were consulted in line with Government regulations;
  - ii. The sample of five planning applications selected for review within the period 28<sup>th</sup> October 2021 and 3<sup>rd</sup> November 2021, were approved in line with the officer Scheme of Delegation (in this instance Sub-Delegations);
  - iii. For a sample of five planning conditions assigned to five separate planning applications, all had been reviewed and discharged as expected; and

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<sup>2</sup> FUL and COU: - both reflect planning permissions including Changes of Use, HHOLD: Household, ADV: Advertisements, LBC: Listed Building Consent, TEL: Notifications Telecom, CPE: Certificates of Lawfulness of existing developments

## Agenda Item 5

### Appendix B

- iv. From a sample of 15 planning applications (across major, minor, and other developments) received between 1<sup>st</sup> January 2021 and 30<sup>th</sup> April 2021, 12 (80%) all were determined either within the statutory determination period or by the agreed extension date<sup>3</sup> for decision-making.

## 5. Conclusion

- 5.1 Development Management have a framework in place for accepting, validating, and determining planning applications. Performance against national metrics for determining planning applications for the period under review demonstrate that the service is performing well against these.
- 5.2 There are opportunities for the service to explore options for improving communications, transparency of the service offer, service standards, and management of public and consultee expectations.
- 5.3 Internal Audit has made nine medium priority recommendations to further strengthen the internal control environment, risk, and performance management arrangements.

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<sup>3</sup> Agreements to extend the time for determination can be made for Major, Minor and Other applications that would normally be determined within eight or 13 weeks. The agreement must be in writing between the applicant and the Council.

## 6 Audit Opinions on Risk Management and Control

6.1 The Public Sector Internal Audit Standards require Internal Audit to provide an independent opinion on the adequacy and effectiveness of the risk identification processes which management has put in place within the area under review, and a sound framework of controls is in place to sufficiently mitigate those risks. This opinion feeds into the Head of ARA's annual opinion on the overall adequacy and effectiveness of the Council's governance, risk management and control environment, which supports the Annual Governance Statement.

6.2 Each report will provide a statement on the levels of assurance that can be given within these two areas, evaluated by applying the following criteria:

Assurance Levels	Risk Identification Maturity	Control Environment
<b>Substantial</b>	<b>Risk Managed</b> Service area fully aware of the risks relating to the area under review and the impact that these may have on service delivery, other services, finance, reputation, legal, the environment, customer/partners, and staff. All key risks are accurately reported and monitored in line with the Corporate Risk Management Strategy.	<ul style="list-style-type: none"> <li>System Adequacy – Robust framework of controls ensures that there is a high likelihood of objectives being achieved.</li> <li>Control Application – Controls are applied continuously or with minor lapses.</li> </ul>
<b>Satisfactory</b>	<b>Risk Aware</b> Service area have an awareness of the risks relating to the area under review and the impact that these may have on service delivery, other services, finance, reputation, legal, the environment, customer/partners, and staff. However, some key risks are not being accurately reported and monitored in line with the Corporate Risk Management Strategy.	<ul style="list-style-type: none"> <li>System Adequacy – Sufficient framework of key controls for objectives to be achieved, but control framework could be stronger.</li> <li>Control Application – Controls are applied but with some lapses.</li> </ul>
<b>Limited</b>	<b>Risk Naïve</b> Due to an absence of accurate and regular reporting and monitoring of the key risks in line with the Corporate Risk Management Strategy, the Service area has not demonstrated an adequate awareness of the risks relating to the area under review and the impact that these may have on service delivery, other services, finance, reputation, legal, the environment, customer/partners and staff.	<ul style="list-style-type: none"> <li>System Adequacy – Risk of objectives not being achieved due to the absence of key internal controls.</li> <li>Control Application – Significant breakdown in the application of control.</li> </ul>

6.3 Taking account of the issues identified in this audit, in our opinion, **Satisfactory** assurance can be provided that the risk identification arrangements operating within the area reviewed are operating as intended. **Satisfactory** assurance can be provided that these risks which are considered to be material to the achievement of the services objectives for this area under review are adequately managed and controlled.

## 7 Appendix A – Action Plan and Management Response

- 7.1 This section contains the findings for each audit objective along with any recommendations made by Internal Audit to strengthen the control environment. The recommendations are categorised as follows:

Priority	Description
High	Critical/Major risk exposure which materially impact on the assets, reputation, service delivery and objectives of the Council.
Medium	Moderate risk exposure that impacts on the assets, reputation, service delivery and objectives of the Council.

**Objective: To determine the effectiveness of the arrangements for accepting, validating, and determining planning applications for major and non-major developments, to ensure these are recorded and processed with**

- i. **Decisions being made within the statutory determination period; and**
- ii **Planning conditions are discharged in a timely manner.**

### Procedural Guidance

- 7.2 The process for accepting, validating, and determining planning applications is documented at a high level in the form of a flowchart. The end-to-end process, procedures, roles, and responsibilities have not been documented in a Procedures Manual to support officers with processing applications in a consistent and timely manner. It is also important that the expectations for the retention of key documents and communications are clearly defined and documented.
- 7.3 Internal Audit have been advised by the Head of Development Management and the Development Team Manager that they have started developing guidance for the end-to-end planning process.

No.	Recommendation	Risks	Agreed Action	
1 (M)	Develop full guidance to set out the expected procedures to include officer roles and responsibilities, for the various stages of processing planning applications. This document should also define the arrangements for retention of key documents and communications.  Provide training to officers on the guidance once developed.	A lack of defined and agreed procedures could negatively impact upon the accuracy and timeliness for processing planning applications through to determination. An inconsistent or incomplete approach could be taken leading to poor service delivery, complaints, and damage to the Council's reputation.	We will continue our programme of documenting and standardising procedure notes.  Training will be provided to Officers once complete.	
			Person Responsible	Due Date
			Team Leader Planning Support	30 <sup>th</sup> September 2022

### Receipt and Acceptance of Applications

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- 7.4 The Planning Support Team are responsible for receiving and accepting planning applications. Due to the lack of available documented procedural guidance Internal Audit established the current process in operation with the Planning Support Officer. From discussions held, no key control weaknesses were identified within this stage of the process. No compliance testing was undertaken in this area.

### Validation of Applications

- 7.5 The Technical Team are responsible for reviewing and validating planning applications. Uniform automatically generates a checklist customised for the type of planning application, and can include items such as 'Archaeological Assessment', 'Biodiversity Survey' and 'Flood Risk Assessments'. Officers review each item on the checklist and make a decision on whether it is Satisfactory, Unsatisfactory or Not Applicable. Audit testing identified an inconsistent approach by officers as well as system errors, these being:
- i. Inconsistency of recording validation actions undertaken by officers within the checklist held in Uniform; and
  - ii. Instances when Uniform has either automatically locked (which is the preferred process as it evidences this part of the process is complete) or not locked, or deleted the checklist once the application was validated (system error).

- 7.6 In addition, Internal Audit found that when more than one parish council is consulted the Uniform system does not always store each letter of correspondence. An email audit trail is available though, thus evidencing that parish councils had been appropriately corresponded with.
- 7.7 Internal Audit has brought this to the attention of the Systems Processing Officer who is investigating these issues. The Development Team Manager has advised that to fix such issues assistance may be required from corporate IT or the software provider. The Head of Development Management has advised Internal Audit that it is her experience that where such issues in the system have been previously identified and raised with the software provider, that fixes are not always forthcoming.

No.	Recommendation	Risks	Agreed Action	
2 (M)	Formalise the quality assurance process to provide management oversight that the processes at each stage: accepting and validating have been followed correctly and in a timely manner.	Errors or omissions within the processing of planning applications are identified late in the process.	This follows on from Recommendation 1 and will introduce sampling every six months.	
			Person Responsible	Due Date
			Team Leader Planning Support	31 <sup>st</sup> July 2022

No.	Recommendation	Risks	Agreed Action	
3 (M)	Investigate and remedy the Uniform system errors.  Should these not be able to be remedied through software updates or similar, alternative arrangements to ensure accurate record keeping should be implemented.	Impaired audit trail within the planning application process.  Incomplete record keeping.	System issues to be raised with IT and software provider.	
			Person Responsible	Due Date
			Systems Processing Officer	30 <sup>th</sup> April 2022 (this post is currently vacant)

## Determination of Applications

- 7.8 The Uniform system includes a dashboard that allows Officers and Managers to monitor the progress of planning applications. This enables officers to have oversight of those applications approaching the determination period. This monitoring tool, if utilised by officers as intended, should prevent decisions from being made after the statutory, or agreed determination period.
- 7.9 The adopted officer Scheme of Delegation means that the majority of applications are determined under officer delegated powers, leaving the Development Control Committee (DCC) to consider the more contentious applications. Minutes for the Development Control Committee are published on the Council's website.
- 7.10 From June 2021 a new process has been implemented to support referrals to the Development Control Committee (DCC). This was introduced to ensure that all requests for referral to the Chair of the DCC are properly recorded and help mitigate against planning applications referred to DCC being determined under officer delegated powers. Internal Audit sampled one such referral and found that the new process had been complied with.
- 7.11 A Delegated Panel that consists of six officers, who on a rota basis (two officers each day) review and assess the information presented in support of the case officer's planning application recommendation. The review by Panel officers offers independent oversight and consideration of the comprehensiveness of the information being presented to support approval of decisions. Factors considered, for example, (as evident from review of the case officer's report) includes historical applications, consultee feedback, biodiversity reports, the Local Plan, and regulatory requirements.
- 7.12 Internal Audit sampled five planning applications that went to the Panel between 28<sup>th</sup> October 2021 and 3<sup>rd</sup> November 2021. Internal Audit confirmed for the five planning applications two officers of the Panel had reviewed them, and these officers were on the list of Sub-Delegations. Internal Audit found no evidence that decisions were made by default and not without due consideration.
- 7.13 The Town and Country Planning (Development Management Procedure) (England) Order (Article 25 and Schedule 4d) states that parish and town councils should be consulted. This would occur when a '*development, in relation to which an application for planning permission has been made to the Secretary of State under section 293A of the 1990 Act (urgent Crown development: application)(a), where that development is likely to affect land in the area of the parish council*'. In all other cases the Council should notify a parish council when an application is received that could affect land in the respective area. In determining the application, the Council must take into account any representations received from the parish council and must not make a determination before either:

- i. The council of the parish inform them that they do not propose to make any representations;
- ii. Representations are made by that council; or
- iii. The period of 21 days of the notification to them has passed.

7.14 Validation includes checking that the correct fee has been received, that there are no errors in the required paperwork and the right type of application has been submitted. The verification process could determine that an application is invalid and therefore it would not be in the public interest to share information before the validation process is complete. Statutory Consultees are therefore consulted once the planning application has been validated. They can request an extension to the 21 days to respond which will be considered by the Case Officer.

7.15 Internal Audit reviewed all 411 planning applications received between 1<sup>st</sup> April 2021 and 30<sup>th</sup> June 2021 that had a reference ending with either FUL, HHOLD, COU, ADV, LBC, TEL or CPE<sup>4</sup> and found that parish and town councils were consulted in line with Government regulations.

7.16 Between 1<sup>st</sup> April 2021 and 30<sup>th</sup> June 2021 there were 729 planning applications of which 675 included the requirement to either notify or consult with a parish or town council. Of these 675:

- i. 263 (39%) responded within 21 days;
- ii. 208 (31%) responded but took longer than the 21 days; and
- iii. 204 (30%) did not respond (It should be noted, not commenting is an acceptable response to the consultation).

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<sup>4</sup> FUL and COU: - both reflect planning permissions including Changes of Use, HHOLD: Household, ADV: Advertisements, LBC: Listed Building Consent, TEL: Notifications Telecom, CPE: Certificates of Lawfulness of existing developments

No.	Recommendation	Risks	Agreed Action	
4 (M)	Management should explore perhaps through the Parish and Town Council Forum (if reinstated), or alternative avenues, potential options for improving the level and timeliness of responses to planning applications from respective councils.	<p>The planning decision-making process may be less informed.</p> <p>The Parish and Town Council Forum may not be represented by all town and parish councils, in particular those that choose not to respond.</p>	Development Management will engage in the Parish and Town Council Forum, should it be re-established. Furthermore, we will analyse data on applications where a response is not received from the parish or town council to identify trends and investigate barriers with these councils.	
			Person Responsible	Due Date
			Development Team Manager	31 <sup>st</sup> December 2022

7.17 To support the Council to meet the Government's requirement for statutory determination regulatory periods or for Development Management to present reports to Committee, it is important that consultees respond to communications within 21 days. If a statutory consultee does not respond within the prescribed period the Council can proceed to make a decision on the planning application, although they are often reluctant to do so without their required specialist input and expertise, especially on Major applications. Internal Audit sampled 13 planning applications received between 1<sup>st</sup> Jan 2021 to 31<sup>st</sup> June 2021 to determine whether statutory consultees (excluding town and parish councils) responded within 21 days and found (see Table 1 below):

- i. 54% responded within 21 days;
- ii. 21% took longer than 21 days to respond; and
- iii. 25% did not respond.

**Table 1: Analysis of Responses from Consultees (excluding town and parish councils)**



7.18 Audit testing highlighted delays from both internal and external statutory consultees. Internally, the key outliers being the Biodiversity Officer, Conservation Team, Water Resources Engineer, Planning Strategy Manager and externally, the Gloucestershire County Council Highways Team and Public Rights of Way. The Development Team Manager advised Internal Audit that the outcomes for timely responses from internal statutory consultees may be skewed. These responses are often provided verbally, or via email and are not always subsequently captured within Uniform. The service is in the process of ensuring that all consultees are signed-up to the newly launched Public Access website. This requires responses to be channelled through this route, therefore going forward this issue should be addressed and record keeping improved. During the interim period, management should ensure that all such responses are formally documented and retained.

- 7.19 It is noted that the Council has a greater opportunity to influence the timeliness of responses from internal consultees whilst this would be more difficult for external consultees. The Head of Development Management informed Internal Audit that the issue of delays in receipt of responses from external consultees has been escalated in the past to the previous respective Strategic Director. It is acknowledged however, that this issue is still ongoing and when explored previously was fundamentally due to external staff resource issues. In addition, the Head of Development Management advised that the Government have mooted that the current option for requesting an extension of time for determinations may be abolished going forward. It is therefore important for this issue to be pursued once again.

No.	Recommendation	Risks	Agreed Action	
5 (M)	Management should engage with the respective internal and external statutory consultees to further explore viable solutions that could support the return of timely communications (within the prescribed 21-day period).  Ahead of this and moving forward management should ensure that all responses are in writing and documented within Uniform.	The planning decision-making process may be less informed and effective.	For internal consultees, we shall continue the implementation of public access, monitor, and evaluate response times, and raise with service leads as necessary.	
			We shall monitor and evaluate response times for external consultees against the 21-day target. Where continued issues of poor response times are identified communication with external consultees may be required at Strategic Director of Place level.	
			Person Responsible	Due Date
			Head of Development Management	30 April 2022

- 7.20 Responses provided by consultees are considered by officers however they are not automatically replied to. This is in line with the Council's website statement "It is not our policy to acknowledge or enter into correspondence on comments made relating to planning applications". Internal Audit established from discussions held with the Development Team Manager that this is a statement of procedure and will be reviewed as part of the Corporate Standards for Customer Service project.
- 7.21 The Statement of Community Involvement encourages anyone who wishes to make a response to a planning application to do this either by:
- i. The public access system on the Council's website [www.stroud.gov.uk](http://www.stroud.gov.uk);
  - ii. Email: [planning@stroud.gov.uk](mailto:planning@stroud.gov.uk); or
  - iii. Writing to: Planning, Stroud District Council, Ebley Mill, Stroud, GL5 4UB
- 7.22 Internal Audit is also aware of a fourth type of response method where emails are sent direct to a named officer. This mix of response options could lead to a delay in communications between the parties for various reasons, and offers the opportunity for there to be a lack of transparency as to who will respond and the ability for management to ensure oversight of appropriate and timely replies.
- 7.23 The service does not have a single repository or digital platform available for all communication flows, and therefore no service oversight or reporting metrics on timely communications currently exist.

No.	Recommendation	Risks	Agreed Action	
6 (M)	Management should consider options for strengthening the internal control environment for the management and monitoring of communication flows as part of the service redesign strand of the Council's Fit for the Future modernisation programme.	Lack of, or untimely, responses could have a negative impact on the Council's reputation.	1. The service will review its templates to address concerns over potential for multiple points of contact with a 'digital first' approach. 2. The service will engage fully in any improvements brought in through a digital platform or the Fit for the Future (FFF) programme, but this is beyond the direct influence of the service.	
			Person Responsible	Due Date
			1. Systems Processing Officer  2. Team Leader Planning Support	1. 31 <sup>st</sup> December 2022  2. to be determined by FFF programme

- 7.24 The Community Access and Engagement Manager is currently leading on a council wide project to review and develop Corporate Standards for Customer Service. The design, consultation process and delivery of the new Corporate Customer Service Standards provides an opportunity to consult both internally and with Members. There will also be an opportunity for the Council to engage with the community to enhance and develop these standards. The timeline for these to be in place for the Development Management service is could be early 2022 however delivery will be aligned with the corporate programme rollout. This should ensure going forward these are standardised, transparent, and measurable.

## Discharge of Conditions

- 7.25 Although planning permission may be given there can be certain conditions that must be met before building work can commence, such as approval of external materials or landscaping and boundary schemes. Not all planning conditions require discharging, for example: a condition that building work takes place within three years. Through discussion with the Compliance Technician Internal Audit established the process in place for encouraging planning conditions to be discharged before building works begin, and where breached the onward referral to Planning Enforcement.
- 7.26 Internal Audit reviewed from the period 30<sup>th</sup> October 2013 to 21<sup>st</sup> February 2020:
- i. One sample case for a walkthrough test. All documentation was available to view on the Uniform system, including referral of the case to the Enforcement Team; and
  - ii. Sampled five planning conditions assigned to five separate planning applications (that required discharging prior to building work starting) and found that planning condition information for all five were sent to the Council, reviewed, and discharged as expected.

## Information, Advice and Guidance

- 7.27 The Council's website provides comprehensive guidance accessible to the public. It also provides a search facility of historical applications and decision notices. Adoption of a Development Management Charter would further support transparency of service standards, this could help manage expectations and better inform the public and consultees. Examples of such Charters are publicly accessible for the service to review and consider content for inclusion. (see Appendix B)

No.	Recommendation	Risks	Agreed Action	
7 (M)	The service should develop a Development Management Charter.	Misunderstanding and dissatisfaction from the public, leading to complaints and damage to the Council's reputation.	Following the publication of Corporate Customer Service Standards, the service will develop a Development Management Charter if necessary.	
			Person Responsible	Due Date
			Development Team Manager	31 <sup>st</sup> December 2022

- 7.28 Internal Audit has established through discussions held with the Head of Development Management that prior to Covid-19 Development Management attended the Parish and Town Council Forum to provide support and advice on the planning application process. Once the current health restrictions allow, and should the Forum meetings be reinstated Development Management intend to continue to participate in these.

### Risk Management

- 7.29 There are currently three operational risks on Excelsis, themes being: staffing, IT failures and Covid-19 however the inherent risks that could impact upon the end-to-end process for administering and determining planning applications have not been captured.

No.	Recommendation	Risks	Agreed Action	
8 (M)	The key inherent risks associated with the end-to-end process for administering and determining planning applications and the internal controls in place to manage these should be captured and documented within Excelsis.	<p>Poor controls (design, adequacy, or effectiveness) do not effectively manage risk, or reduce risk to an acceptable level. This could lead to a failure to achieve statutory requirements, corporate and service objectives.</p> <p>Key risks for the end-to-end process are not identified, meaning that effective controls may not be in place.</p>	The service will continue to review risks as appropriate. However, many of the risks faced by the service (such as the number and type of applications) are subject to market forces and the legislative and fee arrangements are matters for central government.	
			Person Responsible	Due Date
			Head of Development Management	1 <sup>st</sup> April 2022

**Objective: To determine whether there are adequate performance management and reporting arrangements in place and that these are operating effectively.**

- 7.30 The Council's service performance metrics for determining planning applications are aligned to the national data set parameters:
- i. 60% of major developments will be determined within 13 weeks;
  - ii. 70% of minor developments will be determined within eight weeks; and
  - iii. 70% of other developments will be determined within eight weeks.

7.31 The service provides performance data to the Department for Levelling Up, Housing and Communities and Ministry of Housing and Communities and Local Government for inclusion in the national data set. Each quarter the Government publishes planning application performance statistics for English Councils calculated over a 24-month period. From July 2019 to June 2021 the published figures indicate that the service is performing highly with:

- i. 94% of decisions for Major developments being made within the statutory regulatory determination periods; and
- ii. 94.7% of decisions for Minor and Other developments being made within the statutory regulatory determination periods.

7.32 The Council's performance and risk management system (Excelsis) includes the three National Performance Indicators that quarterly measure whether planning applications were determined within Government targets. As of September 2021, Excelsis records that the service is continuing to perform well against these, as follows:

Government Target	Output
60% of Major developments will be determined within 13 weeks	86%
70% of all Minor developments will be determined within eight weeks	87%
70% of all Other developments will be determined within eight weeks	92%

7.33 Internal Audit sampled 15 planning applications (across major, minor, and other developments) received between 1<sup>st</sup> January 2021 and 30<sup>th</sup> April 2021 and found that 12 (80%) were determined either within the statutory determination period or by the agreed extension date<sup>5</sup> for decision-making. The disparity of the % figure in relation to the above table could be due to the size of sample selected. Internal Audit reviewed the quarterly government return (P2 Q3 20) for a sample of 15 applications and found no errors in the quality of data.

7.34 It is evident from a review of available prime documents, that for the period December 2020 and September 2021, the Strategic Director of Place, Development Control Committee, and the Environment Committee received Development Management statistics and reports. In addition, in April 2020 Development Management began circulating Development Management performance statistics to all Members, to provide an overview of the performance of the service. These figures are provided on a half yearly basis (April and October) via an information item on Development Control Committee, and then to all members via the Members Weekly Update and include 'Application and Enforcement Performance Statistics'.

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<sup>5</sup> Agreements to extend the time for determination can be made for Major, Minor and Other applications that would normally be determined within eight or 13 weeks. The agreement must be in writing between the applicant and the Council.

- 7.35 Going forward, there is an opportunity for the service to consider the benefits of further developing their performance management information through the introduction of additional metrics. The service could monitor, for example the efficiency and effectiveness of various aspects of the Development Management service delivery, and adherence to the future Corporate Customer Service Standards.
- 7.36 Internal Audit have been advised by the Development Team Manager that the service is engaging with the Planning Advisory Service (PAS) to commission a bespoke service to aid the development of the service. In addition, going forward the service may wish to consider utilising the PAS's recently refreshed (launched in August 2021) Development Management Challenge Toolkit. This would provide a 'health check' against current practice, and should any improvement areas be identified formulate an action plan to drive further service improvements. The Development Management Challenge Toolkit is based on what PAS learned from high performing councils. It is designed to challenge and improve a council's service and is structured to help engagement with staff, managers, councillors, and other stakeholders of the Development Management service.

No.	Recommendation	Risks	Agreed Action	
9 (M)	Management should consider the benefits of further developing the service's performance management information, through the introduction of additional metrics to aid management of the service and supervision.	The performance management arrangements do not support or demonstrate the delivery of corporate and service objectives, targets, and outcomes.	(1) Service is already working on improving performance management information and data sets.	
			(2) PAS consultancy arranged.	
			Person Responsible	Due Date
			(1) Systems Processing Officer (post currently vacant)	(1) 31 <sup>st</sup> December 2022
			(2) Head of Development Management	(2) 31 <sup>st</sup> January 2022

- 7.37 At the end of October 2020, the service launched a 'Planning Application Service - Feedback' survey. This is sent to applicants and agents with the decision notice regardless of the decision type for example, permissions and refusals. It is currently limited to the most common types of applications and to date has not been rolled out for Prior Notifications or Pre-application services. Going forward the service will build upon the survey to further seek the opinions of their customers and use that feedback to shape and improve the service, and delivery.
- 7.38 At the July Audit and Standards Committee, Members had requested Internal Audit to consult with parish and town councils to gain their views of the Council's planning service. Internal Audit contacted five councils to ask:
- i. What are the current strengths of Stroud District Council's planning service; and
  - ii. Do you have any suggested improvement areas?
- 7.39 At the date of issue of this report, Internal Audit had received responses from three parish councils. Comments received relating to the area under review concerning communications and decision making have been included within this report for consideration by management. A summary of these can be found at Appendix C.

## 8 Appendix B Examples: Development Management Charter

South Gloucestershire Council <https://www.southglos.gov.uk/Documents/PTE070404.pdf>

Sandwell Metropolitan Borough Council [www.sandwell.gov.uk/info/200275/planning\\_and\\_buildings/1081/development](http://www.sandwell.gov.uk/info/200275/planning_and_buildings/1081/development)

East Northamptonshire Council [https://www.east-northamptonshire.gov.uk/downloads/file/3934/development\\_control\\_charter](https://www.east-northamptonshire.gov.uk/downloads/file/3934/development_control_charter)

Kirklees English Metropolitan Borough <https://www.kirklees.gov.uk/beta/planning-applications/pdf/development-management-charter.pdf>

Lichfield District Council: <https://www.lichfielddc.gov.uk/planning/development-management-customer-charter/1>

Harrogate Borough Council <https://www.harrogate.gov.uk/planning-development/planning-customer-charter>

## 9 Appendix C: Parish Council Survey Responses

Category	Strengths	Improvement Opportunities
Communications	We are aware of the large number of parishes with whom SDC deals and before Covid found the planning service responsive and helpful.	During lockdown and currently, it has proved almost impossible to speak to anyone on the telephone.
	<p>Their strength is their willingness to help parish councils with advice about planning documents. For example, Neighbourhood Development Plans, and Community Design Statements. And to give more general advice about obtaining grants, being successful with parish projects and schemes.</p> <p>The parish council have dealt with several different officers at different times, and they have all been really helpful.</p> <p>They are also helpful in explaining how to best use planning legislation and guidance for statutory comments. For example, a talk about changes to the view of 'pastiche' in listed building extensions.</p>	It would help communications if the planning staff were back full-time in their offices at Ebley Mill. It is difficult to speak to them when they are working from home and email responses are not always timely.
		It is sometimes difficult to respond to planning applications in the time allowed. When requesting extensions, the parish council has experienced issues with getting the permission prior to the meeting.

Category	Strengths	Improvement Opportunities
Communications Cont'd		Being able to contact the planning officer is very difficult. Getting call backs when requested is not always the most reliable. Being able to talk to the relevant planning officer is even harder!
		On an infrequent number of occasions, the parish council has had to abandon its meetings due to access to the planning applications. It would be helpful if commenting wasn't switched off quite so rapidly passed the date to enable the parish council to add a response even after the deadline if the application is not decided. Residents have reported that the website is very difficult to manoeuvre around, this puts them off responding.

Category	Strengths	Improvement Opportunities
Decision Making	On standard planning applications for existing housing, SDC generally supports the view of the parish council that provides balanced decision making. It would be unrealistic to expect SDC planning to always agree with us on planning issues but, we find SDC generally gives the council a fair hearing and go out of their way to consult.	Regarding larger scale development, it is felt that SDC planning can be 'heavy handed' and dismissive and in these cases, it would be reassuring to have a more reasonable platform at the committee stage for presentation of issues affecting a parish.
	A strength is their commitment to keeping a local plan in place to avoid unwanted development across the district.	Their commitment to the environmental policies should be recognised.
		A number of applications had decided important factors associated with reserved matters and have not given the parish council sufficient opportunities to discuss matters related to these. We appreciate that reserve matters do come to the parish councils but feel that sometimes the main pointers have all been discussed at committees for the resolution, and it is very difficult to change by the time the reserved matters are put for resolution. The parish council would welcome the opportunity to discuss reserved matters in detail prior to decision.

Category	Strengths	Improvement Opportunities
Decision Making Cont'd		Sometimes the maps and plans provided by the developers are unreadable, a more consistent approach to acceptable plans could be delivered to support parishes.
		When a number of planning applications are applied for a whole road or area, it would be useful if SDC would consider them as a more united application rather than lots of little ones to ensure the infrastructure is delivered as required.
		Regard paid to comments by parish councils on planning applications or local plans. The planners do not give enough consideration to parish council comments or to local knowledge. It would help if the local knowledge was acknowledged or addressed as it can sometimes appear that it is being disregarded. For example, comments that the proposed site for development within the parish floods every year, and the council had an alternative suggestion, but it seems to have been completely ignored.

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# Planning Review (Enforcement)

18 November 2021

Duncan Edwards - Senior Auditor

Paul Jones - Internal Auditor



# Agenda Item 5

## Appendix C

### Distribution

To: Geraldine LeCointe, Head of Development Management  
Copied to: Brendan Cleere, Strategic Director of Place  
Andrew Cummings, Strategic Director of Resources  
Stephen Taylor, Monitoring Officer  
Griffith Bunce, Development Team Manager  
Ian Mallinson, Senior Enforcement Officer  
Sarah Turner, Senior Policy and Governance Officer  
Marie Parkington, Information Governance Officer

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### Important

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## Executive Summary

### 1. Introduction

- 1.1. Stroud District Council (the Council) is the area's local planning authority, whose duty it is to carry out specific planning functions. The Council's broader Development Management Service enables the discharge of this duty. One of the functions of the Development Management Service is planning enforcement. The Planning Enforcement Service is a discretionary service, where the Council investigates complaints about alleged breaches of planning control.
- 1.2. The National Planning Policy Framework advises local planning authorities to act in a proportionate way when responding to suspected breaches of planning control. The Framework states that enforcement can be important for maintaining public confidence in the planning system, but enforcement action is discretionary and must be proportionate. Detailed information about planning enforcement powers is given in the online Planning Practice Guidance on ensuring effective enforcement. For example, a local planning authority may decide not to take enforcement action if it believes that a development would have been granted planning permission, or may require retrospective planning permission to be obtained.
- 1.3. The Council has responsibility for taking appropriate enforcement action as necessary, in the public interest, within the Stroud District. The Council has an Enforcement Policy and Procedure which recognises that planning enforcement can be a complex and involved process with varying timescales. The aim of the policy is to ensure that the Council's approach is fair and reasonable, that interested parties are kept informed, and that any action is timely and proportionate. This being said, service provision has been adversely impacted by the imposed national (and local) restrictions across the UK in response to the Covid-19 pandemic.
- 1.4. The actions of the Planning Enforcement service are governed by the Town and Country Planning Acts, National Planning Policy Framework, Planning Practice Guidance, the Council's Constitution and the Planning Enforcement Policy and Procedure.
- 1.5. At the April 2021 Audit and Standards Committee Meeting, matters were raised concerning the Council's Planning Enforcement service by several Committee Members and other Members invited to attend and comment. The Audit & Standards Committee requested that Internal Audit undertake an objective and independent review into the Planning Enforcement service.

### 2. Audit Scope

- 2.1. This audit review has considered the following key service components (themes):
  - i. The development, review, and approval process for the Council's policy;
  - ii. Processes and systems designed to implement the policy and to ensure its application;

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- iii. Control systems designed to ensure and report on compliance with the processes;
- iv. Process and system changes implemented and planned to improve service delivery and outcomes, including the introduction of enhanced IT systems;
- v. Service 'management', operational activities and processes that assess, ensure, and confirm (including monitoring and reporting) that desired policy objectives are achieved (as detailed in section B of the approved Terms of Reference);
- vi. The Member oversight and engagement arrangements that monitor, support, and ensure the service has the required inputs to deliver the desired performance outcomes and deliver those outcomes; and
- vii. The service delivery arrangements during the Covid-19 pandemic in meeting the national and Council requirements to keep staff safe and the consequential impact on following the policy and procedure and delivering outcomes.

- 2.2. It should be noted that during the course of the review a number of areas have been considered where there are corporate arrangements that should apply, for example, project management, service planning, risk management. The corporate approach to these areas have been determined as being outside of the scope for this review. However, Internal Audit has considered how these have impacted on the enforcement service and how they may have better aided it. Recommendations have been made, but these need to be considered against the particular corporate arrangements and practices operating and planned.

### 3. Key Findings

- 3.1. This internal audit has been undertaken through an information-gathering process that included:
- i. Interviews and discussions;
  - ii. The review and testing of processes, including systems and controls. The processes reviewed (and tested) included those in operation in the recent past, and those in current use. Any changes planned were also reviewed; and
  - iii. The review and testing of the key components of effective service delivery which allow for the attainment of the desired policy objectives.
- 3.2. Prior and during the audit period the service was in the process of a system review and change which included the implementation of 'Enterprise' the service's case management system. The findings in this report identifies how the service's planned development actions will enhance operational and management processes and makes recommendations where additional actions will be beneficial.

- 3.3. During the course of the Internal Audit fieldwork, it was apparent that the service was aware of the challenge it had and was experiencing in delivering the requirements of the Planning Enforcement Policy and Procedure. The service had developed an improvement plan, though improvements were identified over the course of our fieldwork. Following discussions with the Development Team Manager, this initial version of the improvement plan has been further developed into a comprehensive Business Improvement Plan. This Plan has been appended to this report as Appendix B.
- 3.4. The findings below identify the challenges the service faced, contributing factors, and include recommendations to address these (or link to the relevant action within the Business Improvement Plan):
- i. Procedures should be reviewed and clarified to ensure that Member oversight of the revised Council Planning Enforcement Policy and Procedure is sufficiently defined;
  - ii. The Enforcement Policy and Procedure requires review and revision to ensure that it contains clear guidance. This review should include establishing through consultation the enforcement aims and objectives, delivery requirements and measurements, and monitoring processes. The policy and procedure monitoring processes should ensure the service is effective and compliant with procedures, internal process, and any statutory requirements. This review and approval of the policy and procedure should be followed by further training on it being offered to Members and officers;
  - iii. There are a number of operating processes which require review, to ensure that they support the delivery of (and compliance with) the Enforcement Policy and Procedure. The current IT systems used (Uniform for case records and Idox for documents and evidence) is a key factor here. For example, Uniform is not a comprehensive case management system, it currently offers little in the way of management information (or oversight functionality) on case progress. There is little built-in functionality with regards to monitoring resource allocation, prompts and event triggers, record-keeping, or communications-monitoring. This has been identified by the service and features in the service's Business Improvement Plan (Appendix B). It is being addressed through the review of Uniform functionality and the adoption of Enterprise, the service's case management system;
  - iv. There are some gaps within the service's Business Improvement Plan with regards to assessing resource demand (as part of achieving key objectives and goals). It is therefore challenging to appraise how realistic Business Plan goals are. The service change being actioned is currently an "activity" to be undertaken alongside 'business as usual'. The change programme should be formally defined as a "project", which requires a resource demand assessment and, where appropriate, specific corporate project support;

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- v. The service has struggled to ensure adequate resourcing; the Head of Development Management has advised Internal Audit that she is aware that this is not unique to Stroud, but is also reflected across many English Councils because of a recognised shortage of applicants with planning related skills. The service has not had a full establishment in 2020 and 2021. Recently the approach to resourcing has relied upon the availability of candidates within the 'agency' market. A comprehensive service delivery resourcing assessment is required that results in a business case for change, if so required, to address the resourcing challenges; and
- vi. The demands on the service have increased due to, in the service's view, the impact of the Covid-19 pandemic. There has been no formal assessment of the demand levels and the impact this has on service delivery and compliance with the Enforcement Policy and Procedure. Demand variances should be proactively monitored to ensure that undue pressure is not placed on the service. It would also be prudent to assess the demands exerted (on resources) by both direct and non-direct service activities to fully understand the direct service resource available.

### 4. Conclusion

- 4.1. The Planning Enforcement service has experienced resourcing and service demand challenges that have impacted on the delivery of the service. The Uniform IT system has not supported working practices and record keeping. The availability of automated performance management tools has not aided the supervision and management of the service. Although it is acknowledged that the Head of Service meets regularly with the Chair of Development Control Committee to discuss matters affecting the service, there is limited opportunity for wider members of the Committee to have appropriate strategic oversight.
- 4.2. Improvement actions are needed to address the service issues. The service had developed an initial improvement plan and has made progress towards implementing this. During the internal audit process, further improvement areas were identified, discussed, and subsequently included in the detailed Business Improvement Plan developed by the service (Appendix B).
- 4.3. In addition to the service's Business Improvement Plan Internal Audit has raised five High and eight Medium Priority recommendations. Once implemented and operating effectively, these recommendations will strengthen the current system of internal control, risk management, and improve monitoring and reporting. These recommendations can be found in full within Appendix A.
- 4.4. The implementation of the Business Improvement Plan and the Internal Audit recommendations offers the opportunity for the foundation and actions needed to deliver the objective and performance requirements of the revised Council Enforcement Policy and Procedure.
- 4.5. The effectiveness of service improvement is reliant on two key factors. These are the resources needed for the timely implementation of the service's Business Improvement Plan and Internal Audit's recommendations, and the resources to deliver 'business as

usual' during this period. How the service is supported in delivering these is critical to its success. The enforcement service improvement also needs to be considered in the context of potential wider impacts on the whole development management service.

- 4.6. Follow-up is required to provide assurance that the improvement planned has been delivered, is effective and has resulted in the desired outcomes. It is suggested the service provide a management update to an officer Member working group to include the Chair and Members of the Development Control Committee (DCC), which will then report back to the DCC and the Audit and Standards Committee, after six months. An Internal Audit assurance review be undertaken after twelve months.

## Appendix A – Action Plan and Management Responses

This section contains the findings for each audit objective along with any recommendations made by Internal Audit to strengthen the control environment. The recommendations are categorised as follows:

Priority	Description
High	Critical/Major risk exposure which materially impact on the assets, reputation, service delivery and objectives of the Council.
Medium	Moderate risk exposure that impacts on the assets, reputation, service delivery and objectives of the Council.

### 5. Theme 1: The development, review, and approval process for the Council's policy.

- 5.1. The Council has an Enforcement Policy and Procedure that details how the Council will consider and action complaints in respect of planning enforcement matters. The policy and procedure states that this will be subject to an annual review. No records were made available to Internal Audit to demonstrate this requirement had been met, the last review is believed to have been undertaken in 2015 but the scope of that review and the process adopted is unknown. Internal Audit has been advised that in the period since 2015 planning enforcement legislation has not changed significantly and therefore the legislative parts of the policy and procedure may not have varied in the period. However, as a result of not undertaking any review, the opportunity to consider the key components of policy development and review have been missed. The regular review of the policy and procedure (by officers and Members) provides the opportunity to ensure that the service can meet the locally assessed service need, and that this is clearly defined, deliverable, and effectively monitored on an ongoing basis. The latter requires robust management mechanisms for oversight and ongoing testing to ensure compliance with the policy and procedure.
- 5.2. The service is aware the policy and procedure need review and updating, and this is proceeding, though sickness, staff shortages and the pandemic have delayed progress. The Business Improvement Plan Goal A (Appendix B) gives a revised development timeline of May 2022. As it is from the Enforcement Policy and Procedure that the processes stem, it may prove beneficial to bring the timeline for the completion of the review forward if possible. The service has confirmed the review will consider other authority's policies to identify best practice. In addition, development will consider the relationship between scope, outcomes, demand, and inputs to offer assurance that the objectives and performance requirements can be delivered.
- 5.3. The review of the Council's Planning Enforcement Policy and Procedure is an opportunity for procedures be reviewed and clarified to ensure that Member oversight of it, is sufficiently defined.

- 5.4. Internal Audit has reviewed a very early draft version of a revised policy and procedure and offered comment and observations for the service to consider, and has offered to provide comment on future draft versions.

No.	Recommendation	Risks	Agreed Action	
1(M)	Procedures should be reviewed and clarified to ensure that Member oversight of the revised Council Planning Enforcement Policy and Procedure is sufficiently defined.	Members do not have oversight of the Enforcement Policy and Procedure objectives and its performance measures.	The revision of the Enforcement Policy and Procedure will define the arrangements for Member monitoring of its objectives and performance measures.	
			Person Responsible	Due Date
			Strategic Director of Place and Head of Development Management	31 <sup>st</sup> December 2021

No.	Recommendation	Risks	Agreed Action	
2(M)	<p>The review of the Enforcement Policy and Procedure is key to ensuring Members approve guidance that meets the Council's needs, can be delivered, and can be monitored for effectiveness and compliance (with outcomes that can and will be measured).</p> <p>This review should be a collaborative process between Members and officers. A Policy and Procedure Development Programme has been developed (Business Improvement Goal A, Appendix B), which involves consultation with stakeholders. However, this process should be further defined – this represents an opportunity to proactively engage with Members and groups who may initiate complaints on a more regular basis, like Parish and Town Councils.</p>	The policy and procedure review process does not maximise the learning opportunities from those who have recent experience of engaging with the service.	<p>There is a plan to set up an informal Member group from Development Control Committee to discuss development management and enforcement performance management issues. This group, to be chaired by the Head of Development Management, will provide the Members oversight for the revised Enforcement Policy and Procedure. Consultation on the revised policy will be carried out in accordance with the Council's Corporate Consultation Strategy. The method of adoption of the revised policy is dependent on the outcome of Recommendation 1. Resources available to progress this dependent on Recommendation 5.</p>	
			Person Responsible	Due Date
			Development Team Manager	Revised policy and procedures to DCC 31 <sup>st</sup> July 2022

## 6. Theme 2: Processes and systems designed to implement policy and to ensure its application and the control systems designed to ensure and report on compliance with the processes.

- 6.1. Internal Audit has reviewed the processes and systems operating to deliver the current Enforcement Policy and Procedure. As stated earlier, prior to the start of this Internal Audit the service had commenced a review of its processes and systems. This service-based review has led to the adoption of the 'Enterprise' case management system. This was progressing during our review and offered Internal Audit the opportunity to view the Uniform system, the way it is used, and to see the added benefits the Enterprise system can bring.

- 6.2. The service is aware the processes operating do not, in all instances, aid the effective delivery of, or support compliance with the Enforcement Policy and Procedure and the management of the service. Internal Audit undertook sample testing to review the current processes to ensure all opportunities to improve both the process and controls are considered and actioned as part of the improvement work and the implementation of the Enterprise system. The following points summarise the key matters identified by the service, following Internal Audit's examination of the systems and processes, and from sample testing of records:
- i. The current system (Uniform) is not a case management system so offers very limited management information on work progress and does not support effective overview or performance monitoring;
  - ii. The system is not used to record the priority assessment given to a case. As a result, performance information cannot be gained from the system on the progress of cases by priority;
  - iii. The system offers the opportunity to use document templates to help ensure standardised wording where appropriate and the ability to add 'free text'. This is not currently used – documents are developed in Microsoft Word and email;
  - iv. The system has limited embedded controls to trigger case review points or to ensure segregation where such control is appropriate, or at system defined approval points;
  - v. The system does not facilitate the monitoring of case communications to aid management to ensure these occur in accordance with the requirements of the policy and procedure;
  - vi. The system does not trigger the closure of cases when appropriate, leaving closed cases open on the system. For cases where a 'no harmful' breach is determined there is no system parameter set to prompt the closure of the case;
  - vii. The operating process has one system holding the case details (Uniform) and another system (Idox) holding the supporting documentation and evidence linked to the case. The process and control arrangements do not ensure information held in the case detail system is supported by corresponding evidence in the document system. Case information can be held in Development Management shared IT drives and officer email records;
  - viii. Although the system records the enforcement officer allocated to each case, the reporting system does not aid the effective overview and monitoring of staff resources and of case management by the enforcement officer;
  - ix. System parameters do not prompt actions where required or report on them when completed, or not carried out. Communicating with complainants or tracking enforcement actions being examples; and

- x. The system does not include parameters that prompt periodic case review, where remedial actions have been agreed to ensure accurate enforcement records and to support accurate reporting to the complainant. For example, where a retrospective planning application has been granted to ensure that; i) accurate enforcement records are in place and ii) the complainant is notified of the outcome.
- 6.3. In many instances, the system shortcoming is overcome by manual processes and 'work arounds', these being; personal case awareness, team discussions, system interrogation, manual record inspections and manual checks on cases. These processes can be inefficient, not always consistent, comprehensive or complete, and do not produce an effective evidenced management 'audit' trail.
- 6.4. The service has identified many of the operating processes that need development and improvement and these form part of the Business Improvement Plan Goals 2 and 3 see Appendix B.
- 7. **Theme 3: Process and system changes implemented and planned to improve service delivery and outcomes, including the introduction of enhanced IT systems.**
  - 7.1. Elements of the processes that will change and be improved as a result of the implementation of the Enterprise system have been identified above and are further detailed in Business Improvement Plan Goal 3 see Appendix B.
  - 7.2. The implementation of the Enterprise case management system offers the opportunity to provide effective processes, controls and performance management that have not been currently available. The Business Improvement Plan includes many of the system changes the IT enhancement will bring to improve delivery arrangements and management information in support of effective service management.
  - 7.3. The Enterprise system is operational in other Development Service's areas, and there is confidence that implementation within the Enforcement Service will be a key factor in delivering improved operational effectiveness.
  - 7.4. Internal Audit has reviewed the planned IT improvements and the impact these will have on the Enforcement Service's operating process, control arrangements and service management arrangements. The combination of the new IT platform, the automation of some processes, and action logging and enhanced controls should be a significant aid to the administrative, control and management, and service oversight arrangements. However, ensuring that the systems potential is maximised, and that it complies with the process, are essential to gaining the full benefits possible. These requirements and opportunities need effective service oversight, robust performance management and gaining and retaining the required resource levels (these are discussed in more detail in other sections of this report).

No.	Recommendation	Risks	Agreed Action	
3(H)	The review and implementation of new IT processes represents an opportunity to ensure the efficiency and effectiveness of both processes and controls. Internal Audit should be invited to be a proactive consultee during the testing phase. This should involve Internal Audit reviewing and offering advice on the planned controls, particularly those that are embedded within the IT systems and that support performance management and the delivery of objectives. Audit plan days should be allocated for this within the current year and 2022-23.	A lack of effective processes and control could impair the achievement of the service to meet the Council's objectives.	Internal Audit will be invited to participate in the design and testing phase. Specifically, as part of Goal 3, Objective 3, Action 3 (scheduled for November 2021) and Goal 3 Objective 4 Action 5 (scheduled for December 2021) of the Business Improvement Plan.	
			Person Responsible	Due Date
			Head of Development Management or Development Team Manager and Strategic Director of Resources	31 <sup>st</sup> December 2021

No.	Recommendation	Risks	Agreed Action	
4(M)	The service should undertake a post-implementation review of the Enterprise system and associated processes. This will ensure that maximum benefit is being obtained and the desired level of case and performance management, control, and record-keeping is being obtained. Internal Audit should be invited to provide independent support to assist this specific review.	The service change programme fails to deliver its intended enhancements and therefore improved service effectiveness that supports the delivery of service performance requirements.	Internal Audit will be invited to participate in the review phase, specifically Goal 5, Objective 2, Action 3 (scheduled for February 2022) and Goal 5 Objective 3 Action 2 (which is dependent on the adoption of the revised Enforcement Policy and Procedure) of the Business Improvement Plan. Resources available to progress this dependent on Recommendation 5.	
			Person Responsible	Due Date
			Development Team Manager	31 <sup>st</sup> July 2022, to coincide with Recommendation 2

- 7.5. There are a number of factors and challenges created by the current approach to implementing service change. These may be specific to this implementation or to the approach used by the Council. Given the increased demand and staffing challenges experienced by the Enforcement service, Internal Audit requested details of the structured and resourced project approach for implementing Enterprise and the associated review and change of processes. For example: funding, officer input, backfill (if needed), delivery plan with timescales and milestones. It is understood that arrangements to support service change initiatives are being planned as part of the wider corporate change processes. The Enforcement service needs to ensure it gains any additional support it needs to deliver its change programme and to deliver its 'business as usual' requirements. The Business Improvement Plan has named responsible officers and some target dates, but there are some gaps. In addition, there is no resource demand assessment in the Business Improvement Plan to provide assurance that it is realistic.

No.	Recommendation	Risks	Agreed Action	
5(H)	The service should consider its need for corporate support to deliver its change and improvement programme. Minor change may be able to occur alongside 'business as usual' activities, but change beyond this should be considered as a project in its own right. This project should have clear terms, delivery goals and outcomes, be resourced, be time-limited and have a delivery assurance process. It is Internal Audit's opinion that the Enforcement service's Business Improvement Plan is an activity that should be defined as a 'project' requiring a clear resource demand assessment and support as assessed pertinent.	Business change is not effective in delivery improvement, or delivering within desired time scales, or business change draws resource and impacts on 'business as usual' delivery.	The service agrees in principle with this recommendation and fully supports its implementation however, there is a lack of resource available to assist the service in delivering this piece of work as a project. Although requiring significant resources, the Business Improvement Plan as drafted is considered to be broadly achievable but only to the detriment of the business in other areas of the service. There is not a corporate project team to either manage or support the delivery of a project by the service. There is a structural, financial, and skill resource issue in implementing this recommendation. Discussion to be held with Strategic Director to establish resource and timescale. This recommendation is key to the delivery and success of most other recommendations.	
			Person Responsible	Due Date
			SLT (resource availability) Strategic Director of Place and Head of Development Management	31 <sup>st</sup> March 2022

**8. Theme 4: Service ‘management’, operational activities and process that assess, ensure, and confirm (including monitoring and reporting) that desired policy objectives are achieved.**

Delegations, Approvals, and the Authorisation Processes

- 8.1. The Constitution and the policy and procedure detail the delegation process, which is applied. The review of the policy and procedure is the opportunity to ensure these are appropriate to need. Internal Audit has discussed automated control processes. Control parameters will be built within the IT systems to provide an electronic authorisation arrangement that ensures all delegations are correctly applied prior to a case progressing or concluding. This will also create a comprehensive management ‘audit’ trail. This action forms part of the Business Improvement Plan - Goal 3 – see Appendix B.

Awareness and Training in Enforcement Policy and Procedure

- 8.2. Training on the Development Management service is offered to all Members with specific training being offered to Members of the Development Control Committee. In both instances training includes planning enforcement.
- 8.3. The enforcement service is tasked with applying the policy and procedures that Members have determined as appropriate to deliver the planning enforcement objectives as set by the Council. Members have an important role in ensuring that the objectives of the policy are delivered. This may involve providing effective support to complainants from their Wards, supporting the enforcement services determinations or in providing challenge where it is felt appropriate to do so.
- 8.4. The development of a policy and procedure is an opportunity to review and set future awareness and training arrangements. There will be particular elements of policy and procedure where stakeholders and those making complaints should have clear understanding. The areas of priority setting, and therefore the resulting investigation process and potential actions, and the assessment of ‘harm’ and the implications of this assessment are key areas. The revised policy and procedure will be placed on the Council’s website. This is an opportunity for providing additional awareness through the availability of more information that may be beneficial to complainants helping them to better understand how the Council applies its enforcement policy and procedure. Parish and Town Councils are a source of a number of enforcement complaints each year. The offer of training or workshops may prove beneficial and would enhance relationships between the service and this tier of government.
- 8.5. A solution or partial solution to the resourcing challenge may be for the service to ‘train its own’. Current staff have moved into the service with limited experience of planning enforcement. The service has recognised the need to up-skill staff and to provide a professional training and development programme – Business Improvement Plan Goal 6 see Appendix B. In addition, the links between

training on the application of the Enforcement Policy and Procedure, and the service processes, is key to supporting and ensuring service performance – Business Improvement Plan Goal 4. Training linked directly to service provision and compliance needs to form part of a programme that tests effectiveness, is regularly refreshed, and ensure the consistent application of the policy, procedure, and process.

No.	Recommendation	Risks	Agreed Action	
6(M)	Officers should determine and agree the training and awareness arrangements required and provided to stakeholders, interested parties and staff. Determining and agreeing the delivery methods, frequency, scope, and funding. The effectiveness of the awareness and training arrangements should be periodically tested to ensure they remain appropriate and effective.	The policy and procedure awareness and understanding arrangements does not support constructive challenge of service determination or the management of service expectations.	<p>The intent of the recommendation is recognised. However, from the service's experience there is little value to detailed training to a wider audience as planning enforcement decisions are made on a case-by-case basis against planning merit. The objective is to provide clear understanding of the enforcement process, procedures, and scope and the service consider this is best met through the content of the revised Enforcement Policy and Procedure accompanying guidance on the website.</p> <p>Strengthen training on enforcement issues at annual mandatory Development Control Committee training. This is open to any Member to attend.</p> <p>Staff training programme spring 2022. Resources available to progress this dependent on Recommendation 5.</p>	
			Person Responsible	Due Date
			Head of Development Management	31 <sup>st</sup> July 2022 (see Recommendation 2)

## Service Planning (Including Risk and Performance Management)

- 8.6. The corporate approach to service planning is outside of scope of this Internal Audit review. However, Internal Audit sought confirmation that the service planning process for the enforcement service included the key components of setting goals and targets, resourcing, performance management, risk management, monitoring of objectives and goals, budget setting and funding arrangements. These processes should identify service challenges and issues, stimulate debate leading to formal assessment, reporting and action where needed. The approval of the service plan should be confirmation that the inputs will deliver the required outputs and outcomes. It is understood the Council is in the process of reviewing its corporate approach to service planning. There is opportunity to inform the service planning process by assessing why for this service area service planning, risk management, and performance management has not identified the service challenges, and supported the service managers in securing corrective options and actions, to ensure the delivery of these.
- 8.7. The corporate processes should trigger short term solutions for formal consideration and approval and, if required, commence the investigation of longer terms options. Members should be actively involved through the corporate reporting arrangements for service planning and delivery, risk, and performance as these directly relate to outcomes and the delivery of Council policy and procedure objectives.
- 8.8. In reviewing and implementing a revised corporate service planning and delivery process the Council should consider and learn from why current corporate arrangements have not formally identified the challenges the Enforcement service was encountering. In addition, the outcomes from such corporate processes should rectify service matters, where Council policy, procedure, and performance requirements were struggling to be met. This could be seen as a weakness of the corporate performance management framework should a performance matter, be the stimulus for referral to the Audit and Standards Committee.

No.	Recommendation	Risks	Agreed Action	
7(H)	Officers and Members should ensure the revised corporate approach to service planning (performance and risk management) provides assurance that policy objectives, performance requirements and risks are being effectively met and managed. Where there are service challenges these corporate and service-based processes should identify and lead to agreed rectification actions that are supported, delivered, and monitored.	The Council fails to identify and escalate service, performance and risk concern and therefore does not resolve these at the earliest opportunity.	The service considers this beyond their remit although fully support this recommendation. This matter shall be raised with the relevant Strategic Directors.	
			Person Responsible	Due Date
			Strategic Director of Resources and Strategic Director of Place	31 <sup>st</sup> December 2021

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### Resourcing, Recruitment, and Retention

- 8.9. During the process to establish the terms of reference for this review, the staffing challenges experienced by the service were strongly referenced by both officers and Members. The Head of Development management has advised Internal Audit that she is aware that the staffing challenge is not unique to Stroud, but is also reflected across many English Councils because of a recognised shortage of applicants with planning related skills. Internal Audit have sought to understand the resourcing and funding position in relation to securing and ensuring the delivery of the policy, procedure, and the associated process. There are a number of factors that impact on service resourcing; funding, staffing levels in relation to demand, staff recruitment and retention, communicating the resourcing challenges and actions to resolve.
- 8.10. The Head of Development Management has advised that service funding and resourcing has been challenging in recent years, and pre-pandemic the enforcement team consisted of:
  - i. Senior Planning Enforcement Officer (1 FT (37 hours per week));
  - ii. Planning Enforcement Officers (2 PT, 22.5 hours and 20 hours per week); and
  - iii. Compliance Technician (1 FT).
- 8.11. During the pandemic the resource has been:
  - i. Senior Planning Enforcement Officer (1 FT) but absent from 17 May 2021 returning 21st July 2021;
  - ii. Planning Enforcement Officer (1 PT works for 20 hours per week);
  - iii. Planning Enforcement Officer (1PT working 22.5 hours per week until 27<sup>th</sup> May 2021);
  - iv. Contract Planning Enforcement Officer (1 FT) - assigned to look after the backlog complaints who started on 10 May 2021, and stayed for the period to 30 July 2021. They were based outside the Stroud District, undertaking desktop assessments, engagements with landowners and property owners by phone and or email; and
  - v. Compliance Technician (1 FT)

8.12. Other resourcing matters to note: The resource now:

- i. Planning Enforcement Officer (PT vacant from 27 May 2021 to 6 September 2021) has now been made a fulltime role (FT 37 hours a week) with a new officer in role since 6th September 2021;
- ii. Planning Enforcement Officer Contract Officer (FT (recent appointment) started on 31 August 2021, based outside Stroud)); and
- iii. The service has been managed by the Development Team Manager; this post was vacant from the end of 2019 to September 2020.

8.13. Although there has been an awareness, Internal Audit has been advised that no formal assessment of the resourcing challenges encountered, the impact on the service, and the potential options that could be considered to resolve this. As a result, the resourcing has been based on the 'market availability' of contract enforcement officers, which may not have met specific service need. Since May 2021, Enforcement services has engaged agency staff, and those requiring planning enforcement training.

8.14. The management structure for the enforcement service was raised with the Development Team Manager and the Senior Enforcement Officer, as it differs from other sections within the direct service teams in the Development Service. The two other teams are headed by 'Principal' officers with the enforcement team being headed by a 'Senior'. This was not pursued as part of this review but should be examined in terms of salary structures within the Development Services team and possible links to recruitment.

No.	Recommendation	Risks	Agreed Action	
8(H)	<p>The service should produce a comprehensive service delivery resourcing assessment, and a business case for change if needed. This should include a formal assessment of:</p> <ul style="list-style-type: none"><li>i Resource to meet demand;</li><li>ii Skills requirements (for each role);</li><li>iii The market rate for the roles required (salaries and supplements);</li><li>iv Staff availability;</li><li>v Reasonableness of service costs (via market testing or benchmarking); and</li><li>vi Alternative delivery models for service delivery (for example, shared service agreements with other local authorities).</li></ul> <p>In addition, this assessment should also factor in the immediate challenges of implementing both IT and process changes. The medium-term impact of a revised policy and procedure and the long-term impact of more effective IT systems (and service demand forecasting) also require consideration.</p> <p>The outcome of this assessment should link to Business Improvement Plan Goal 6.</p>	Service performance requirements are not met due to inadequate staff resources.	There is a clear need to review the resourcing of the planning enforcement function; at present additional resource is provided by agency staffing at considerable cost. However, the resourcing needs are directly related to the requirements of the Enforcement Policy and Procedure and may be influenced by any efficiencies gained through the introduction of Enterprise.	
			A short term review of resourcing will be made in January 2022 before the current agency placement comes to an end (in February).	
			A longer-term review of resourcing will be made in the summer of 2022 once the expectations of the revised Enforcement Policy and Procedure are identified and the Enterprise system has been embedded into the service's ways of working.	
			Resources required to undertake a resourcing assessment should be included in the project resources as part of Recommendation 5.	
			Person Responsible	Due Date
			Head of Development Management	31 <sup>st</sup> July 2022 if resources / support available

## Service Demand

- 8.15. Internal Audit was made aware by officers and Members that in addition to the resourcing challenges, the service has experienced increased demand, particularly since the start of the pandemic. In order to be able to confirm demand levels, Internal Audit obtained complaint case details for recent years and this shows an increase year-on-year. The case numbers are as follows: 402 cases 2018/19, 496 cases 2019/20 and 604 cases 2020/21. The trend over these three years, shows a year-on-year increase in enforcement cases to investigate. In 2021/22 cases at the beginning of September, shows 533 cases, this indicates an expected further increase in cases for the current year. There has been an awareness by both Members and officers of the increase in demand, the pressures this has placed on delivery, and the challenges of resourcing the service. However, there has been no formal assessment and report to Members, on the impact increased demand has had on the delivery of the service and the options to meet this.
- 8.16. The service's view is that increased demand is linked to the pandemic, with changes being made to premises and greater awareness of those changes being made. Demand levels, numbers and complexity need to be monitored over the coming months to determine future levels and trends and the impact this may have.

No.	Recommendation	Risks	Agreed Action	
9(M)	Changes in service demand should be monitored based on pre-determined tolerances which should trigger a formal process that assesses impact and determines, agrees, and approves actions to address these. In the instance of the Enforcement service this could mean officers and Members considering balancing demand to resource and the scope and requirements of the policy and procedure.	Service performance requirement are affected by increasing service demand.	Monitoring of service demand against identified resource tolerances established as part of Recommendation 8. This information can be discussed with the proposed Development Management liaison group to allow for Member involvement.	
			However, there is no provision in the Service Plan or budget for contingency should the tolerances be reached/ breached and the experience of the service is either using agency resource or to make do and mend.	
			Person Responsible	Due Date
			Head of Development Management	31 <sup>st</sup> January 2022 and ongoing

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## Management and Supervision of the Enforcement Service Including Performance Management

- 8.17. Internal Audit has discussed the management and supervision arrangements with the Development Team Manager and the Senior Enforcement Officer and has been advised that in 2018 the service was headed by a Principal Enforcement and Appeals Planner. A number of changes to the management structure now results in the Senior Enforcement Officer providing day-to-day management of the service. The primary function of the Senior Enforcement Officer's role comprises service management, supervision, and the investigation of complex enforcement cases. The post holder and the Development Team Manager have confirmed that increased service demand, the impacts of managing a fluctuating workforce, absence of automated management monitoring and reporting aids and Covid-19 implications, has meant the functions of management and supervision have been compromised through prioritising of service demands. An assessment of the Senior Enforcement Officer's post should be undertaken to ensure provision allows for the management and supervision role to be effectively fulfilled and to determine the scope to undertake direct service activities (complex cases). This information should feed into the wider service assessment of the resource requirements to meet complaint numbers and case complexity pressures.
- 8.18. Understanding the impact of direct and non-direct service activities is key to ensuring adequate direct resource is available to meet policy and procedure requirements and performance standards. Direct service time will have fluctuated and will continue to fluctuate until stable operating systems, processes and staffing arrangements are secured.

No.	Recommendation	Risks	Agreed Action	
10(M)	The service should introduce time and task monitoring arrangements for a limited period in order to obtain timesheet data on the relationship between direct and non-direct service activities. This information can then be used to inform the resource review recommended earlier.	The resource available to the service falls short of that required.	The service will introduce time and task monitoring over a defined period in spring 2022 once the revised Enforcement Policy and Procedure and the service standards it introduces have been published. However, there is a resource implication in the setting up of time and task monitoring which should be included in the project resources as part of Recommendation 5 and 8.	
			Person Responsible	Due Date
			Development Team Manager	30 <sup>th</sup> April 2022

- 8.19. The performance management information to evidence the delivery of the service to the required standards needs improvement. The lack of automated performance information does not aid the supervision and the management of the service and has been identified by them as a key improvement area, Business Improvement Plan Goal 7. Examples of automated performance information that would aid the day-to-day supervision of the service include cases by priority, cases by communication targets, case action tracking, cases by case officer, cases with outstanding actions, closed cases, and case demand levels.
- 8.20. The service performance targets and outcomes should link to and demonstrate the delivery of the policy and procedure objectives. At present no performance monitoring and reporting arrangement is present to demonstrate this. A key component of performance management is the 'golden thread' that links the Council's corporate plan to Council policy, procedure, and service plans to the individual. This chain is broken if performance targets, and outcomes are not set at each level and these support and demonstrate the attainment of the objectives.

No.	Recommendation	Risks	Agreed Action	
11(H)	The performance management framework should be reviewed as part of the policy and procedure review to ensure the delivery of the objectives set can be measured and monitored. This framework should measure and monitor the delivery of the Enforcement Policy and Procedure, supporting and demonstrating the progress of operational and individual targets and outcomes.	The performance management arrangements do not support or demonstrate the delivery of objectives, targets, and outcomes.	The service is in the process of reviewing its performance management tools, as set out in Goal 7 of the Business Improvement Plan. The revised Enforcement Policy and Procedure, the new Council Plan, and any subsequent revised Service Plan will feed into the performance management framework and any tools required to monitor.	
			There is a resource demand to reporting on performance objectives which should be included in the project resources as part of Recommendation 5 and 8.	
			This can only be started with any degree of confidence after other recommendations and aspects of the business improvement plan have been completed and embedded.	
			Person Responsible	Due Date
			Head of Development Management	31 <sup>st</sup> October 2022

Information Management, Record Management and Record-Keeping

- 8.21. The service has identified the need to improve information management and record keeping and sample testing by Internal Audit supports this requirement. A number of steps are being taken, or are planned to address this and forms part of the Business Improvement Plan, in summary the areas identified are:
- i. Control and review process that ensure all information is held in the two systems used (Uniform and Idox) is complete and accurate;
  - ii. Enhanced training arrangements to ensure Enforcement staff understand the record keeping requirement;
  - iii. The use of the systems to generate and retain communications, including the application of system-based templates to ensure standardised wording to comply with legislation and policy;
  - iv. System generated prompts and management information to ensure and record compliance with policy and procedure requirements;
  - v. Enhanced system-based audit trails; and
  - vi. A service specific set of records retention arrangements.
- 8.22. The development of digital access to information that must be publicly available has been included in the Business Improvement Plan – Goal 8.
- 8.23. Changes to operating processes is an opportunity to undertake a data cleansing exercise and this should be added to Goal 8.

Communication Processes, Timeliness and Effectiveness (including with Parish Councils)

- 8.24. The service is aware that maintaining required or desired levels of communication has proven challenging due to resources, increased service demand and the limitations of automated processes. Service communications with Parish and Town Councils has been raised by Members and Parishes. Internal Audit reviewed the communication requirements for Members and Parish and Town Councils. The current policy and procedure reference the communication requirement in respect of the complainant and those subject to enforcement action. Under the policy, Members or Parish Councils making an enforcement complaint is a complainant, the same as a member of public. Parish and Town Councils and Members are not consultees to the complaints received by the service. Each complainant is afforded confidentiality unless specifically waived, or where enforcement action results. Members are informed of enforcement complaints from their Wards that are being progressed.
- 8.25. Complaints that result in enforcement action where a notice is served are currently reported to the Development Control Committee and there is a process for referral to this committee. The reporting arrangements for complaints, for example criteria, scope, actions available, decisions, and tracking, should be clearly defined in the policy and procedures.
- 8.26. Members have expressed an interest in the number of complaint cases raised by Parish and Town Councils. These are summarised in Table 1 below.

**Table 1:** The number of complaints raised by both Parish & Town Councils and Members (Stroud District Council).

Period	Number of Complaints – Parish & Town Councils	Number of Complaints – Members (Stroud District Council)
2019/20 – Full Year	53	22
2020/21 – Full Year	83	31
2021/22 – End July	18	9

No.	Recommendation	Risks	Agreed Action	
12(M)	<p>The review of the policy and procedure is an opportunity for officers and Members to assess, agree and approve the enforcement communication arrangements.</p> <p>The communication arrangements should be governed by the required service levels and legal constraints. These should be able to be performance tracked, monitored, and reported, and meet the expectations and requirements of the complainant, the complaint location owner, occupier or person responsible, and Members, whilst maintaining required complainant confidentiality.</p>	<p>Communication requirements are unclear and not monitored and therefore do not support and aid the effective delivery of the service.</p>	<p>The service acknowledges the purpose of this recommendation. The service intends to address this by setting out the communications expectations in the revised Enforcement Policy and Procedure. Additional guidance may be required for Members who are not themselves the complainant; this will be progressed in the form of a note and published on the Members' Hub.</p> <p>The implementation of this is dependent on the date that the revised Enforcement Policy and Procedure is adopted.</p> <p>Resources being available to progress this are dependent on Recommendations 5 and 8.</p>	
			Person Responsible	Due Date
			Head of Development Management	31 <sup>st</sup> October 2022

### Formal Complaints or Questions Raised (in Respect of Service Delivery)

- 8.27. The Council has a formal corporate complaints process where enforcement complainants feel that they have not been offered the expected service standards (the application of policy and procedure and or the delivery of the service to the required performance standard). Where a formal complaint is made, the corporate complaints process is followed. Three current year cases were sample-tested, and these were being progressed through the formal corporate process. The outcome of complaints escalated to the corporate complaints process should form part of the service performance reporting arrangements.

- 8.28. Internal Audit sought confirmation that service practices enable lessons to be learned from corporate complaints and that the outcomes form part of service improvement arrangements. The service has confirmed that under the Business Improvement Plan – Goal 4, the comprehensive procedure guides will be regularly reviewed. Also, under Goal 6, staff training will reflect learning opportunities arising from the outcome of service complaints.

9. **Theme 5: The Member oversight and engagement arrangements that monitor, support, and ensure the service has the required inputs to deliver the desired performance outcomes and deliver those outcomes.**

- 9.1. The Councils Constitution specifies the functions delegated to the service and the responsibility of the DCC to provide oversight of specific planning control breaches. It is acknowledged that the Head of Service meets regularly with the Chair of Development Control Committee to discuss matters affecting the service. In addition, the service report planning enforcement complaint information to DCC but there is opportunity to enhance this, reporting on the Enforcement Policy and Procedure objectives and performance measures, this has been referenced at point 5 above. Monitoring and reporting also links to earlier comments on, service planning, performance, and risk management. A formal Member oversight of the policy and procedure objectives and performance measures may have aided the communication between the service and Members identifying, determining, and progressing formal resolutions to the challenges the service recently encountered. *Recommendation 1(M) Applies*

10. **Theme 6: The service delivery arrangements during the pandemic in meeting the national and Council requirements to keep staff safe and the consequential impact on following policy and procedure and delivering outcomes.**

- 10.1. The Council issued Covid-19 briefings, undertook service-based risk assessments, introduced local practices, and followed national guidance. The corporate guidance in summer 2020 was, ‘to arrange an appointment and discuss the access to the site (e.g. gates/doors etc. to be left open) and any Covid-security arrangements on site’. The service specific guidance being, ‘the only exception to this being Enforcement visits necessary to gather evidence, but these should still follow core safety measures and all other guidance and measures followed. If visits are unannounced questions regarding the self-isolation of occupants should be made on the doorstep before entering. The visit should be abandoned if necessary’.
- 10.2. It is understood the service followed the guidance, and although service delivery methods will have been impacted by Covid-19, for many of the matters raised earlier in this report; for example, policy and procedure review, service resourcing, operating systems and practices, performance management and oversight, are areas where the impact of Covid-19 has not been the significant factor. This is supported by the following post on the service website page:

*“Disruption to Planning Enforcement Services – We are currently unable to provide a full planning enforcement service due to staff vacancies, absence (including self-isolating), annual leave, and recruitment delays. As a result, this means that we have to prioritise very urgent new enforcement over and above other cases over the summer period. All other complaints are being triaged on receipt. This means we may not be able to respond to lower priority requests and complaints at this time. Agency staff have joined us to improve capacity and we hope the impact on our services will be limited in duration.”*

- 10.3. The increased service demand has coincided with, or stems from, greater resident awareness during the pandemic. The service delivery method has varied in part due to the response to Covid-19 risks, but also due to the “disruptions” detailed above on the website post. Increased demand has also been a factor. Internal Audit was advised by the Enforcement team that Covid-19 has placed constraints on their ability to gather evidence through site visits. As a consequence, reliance was placed on written communications with relevant parties. These were not consistently responded to in a timely manner, impacting upon service provision.
- 10.4. In addition, Covid-19 resulted in ‘working from home’, less interaction between team members, other teams and other services, the impact or benefits being uncertain.

No.	Recommendation	Risks	Agreed Action	
13(M)	As part of the Enforcement Policy and Procedure review, the implementation of the IT system, the changing working practices and any operational benefits stemming from the arrangements introduced during the pandemic should be considered for inclusion.	The review of the policy and procedures and the Business Improvement Plan do not consider the opportunities from the operating variances introduced during the Covid-19 pandemic.	The introduction of Enterprise will facilitate greater levels of flexible working as through the automation of tasks. The corporate approach to hybrid working is being prepared and the service will ensure that new systems and processes take on board the lessons learned from the pandemic.	
			Furthermore, the service will review (as part of its review of the website or digital platform) IT capabilities to allow the submission of supporting documentation and evidence with enforcement complaints.	
			Resources being available to progress this are dependent on Recommendations 5 and 8.	
			Person Responsible	Due Date
			Development Team Manager	31 <sup>st</sup> July 2022

## Appendix B – Business Improvement Plan

The following Business Improvement Plan has been developed by the Enforcement Service and was provided to Internal Audit. This was being actively progressed during the internal audit review.

### Business Improvement Plan: Planning Enforcement

PURPOSE AND AIM OF IMPROVEMENT PLAN			
Review of policy and back-office systems to implement a new way of working which: (a) Ensures a clear, up-to-date, policy that establishes how planning enforcement complaints are investigated; and (b) Improves the efficiency of the service to help meet service demand and user expectations; and (c) Introduces business continuity measures; and (d) Reviews systems and control processes.			
<b>Sponsor</b>	Geraldine LeCointe, Head of Development Management		
<b>Date</b>	September 2020	<b>Version</b>	3
CONTENTS			
GOAL 1	Review planning enforcement policy to ensure it is fit for purpose		
GOAL 2	Establish the procedures for investigating and processing planning enforcement complaints		
GOAL 3	Review and update back-office set-up and upgrade IT software infrastructure, including improving data		
GOAL 4	Provide training on new processes and comprehensive procedure guides		
GOAL 5	Implement new way of working		
GOAL 6	Develop professional training and continued professional development programme		
GOAL 7	Review Uniform case management tools to assist performance management		
GOAL 8	Provide public on-line access to planning enforcement register		

GOAL 1				
Lead officer Griff Bunce				
<b>Review planning enforcement policy to ensure it is fit for purpose.</b> Is the policy clear? Does it explain how enforcement complaints are processed and considered? Are matters such as expediency and priority defined? Are the possible outcomes established at the start of the process? Does it follow best practice?				
OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Establish 'best practice'	Review neighbouring and Gloucestershire authorities' enforcement policy (GC; CB; TB; CD; FOD; SG)	GB	September 2021	<b>Complete</b>
	Review guidance from RTP1 and PAS on enforcement plans	GB	September 2021	<b>Complete</b>
	Identify key components of best practice, particularly around expediency and priority	GB	Mid-October 2021	Started; on-track
	Identify what 'key points' are used for customer contact	GB	Mid-October 2021	Started; on-track
Review existing enforcement plan.	Establish whether current processes meet requirements of existing plan	GB	Mid-October 2021	Started; on-track
	Where processes do not meet requirement of plan, identify what updates are required	GB	Mid-October 2021	Started; on-track
	Assess whether plan is easily understood and identify what areas need to be improved	GB	Mid-October 2021	Started; on-track
Ensure a good customer experience	Define processes, procedures, terminology	GB	October 2021	Started; on-track

	Identify key points for customer contact through entire lifespan of complaint	IM (AC)	October 2021	Started; on-track
	Set key performance indicators for customer contact	IM	October 2021	Started; on-track
	Define (for customer) routes investigations may take and possible outcomes, including timeframes.	IM	October 2021	Started; on-track
Draft revised enforcement plan	First draft prepared and circulated internally	IM	October 2021	Started; on-track
	Review feedback on first draft and revise document	GB	November 2021	Yet to start
	Second draft prepared and circulated internally	GB	December 2021	Yet to start
Adoption of enforcement plan	Consult stakeholders on enforcement plan	GLC	February 2022	Yet to start
	Review consultation responses and prepare final version	GB	March 2022	Yet to start
	Final version and circulated internally and with key stakeholders for approval	GLC	May 2022	Yet to start
	Adoption approval process – committee?	GLC	TBC – process needs to be confirmed and scheduled in forward work programme	Yet to start

GOAL 2				
<p><b>Lead officer</b> Ian Mallinson</p> <p><b>Establish the procedures for investigating and processing planning enforcement complaints.</b> Based on the emerging revised planning enforcement plan, formalise the processes and procedures for enforcement complaints from receipt to closure.</p>				
OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Create 'model' process map	Identify actions required to investigate, formulate recommendations, and close planning enforcement complaints	GB	September 2021	<b>Complete</b>
Review process map	In line with the outputs of GOAL 3, review and update process map.	IM	December 2021	Yet to start; waiting completion of GOAL 3

**GOAL 3****Lead Officer** Debra Bedwell**Review and update back-office set-up and upgrade IT software infrastructure, including improving data.**

Investigate set-up of Uniform to ensure that IT process and procedures meet the expectations of the enforcement plan and process map.

OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Resume 'Enterprise' roll-out (for enforcement module)	Purchase Enterprise key for enforcement module	MA	June 2021	<b>Complete</b>
	Activate Enterprise in enforcement module	Idox	June 2021	<b>Complete</b>
Investigate data quality/ data control/ data management	Review other authorities' use of enforcement module	DB	End of October	Started Brief discussion with Andy Birchley of GCC – April 2021. Imported Enterprise Tasks from Chichester for review. Discussion with Tewkesbury arranged – 01.10.2021.
	Examine Idox knowledge hub for best practice examples	DB	During this project and then annually as a mechanism for improvement	<b>Complete</b>
	Recommend any changes to data entry or data fields	DB	End of October 2021	Work commenced in matching new process map to data entry. Initial ideas discussed with MA/IM/SH.
	Review current code lists in uniform. Are they used? Do they fit with new process map?	DB (GLC)	October 2021	Work has commenced reviewing Suffix types.
	Identify any new codes required	DB	October 2021	Some new Inspection/Action codes and Decision types have

				been identified. These will fit with the process map and Enterprise tasks. Some testing has been undertaken on these in Uniform test system by DB
	Update Uniform Code lists	DB	End of November 2021	Yet to start
Establish checks and control systems	Review Uniform tab/ field security	DB (MA)	End of October 2021	In progress
	Review Uniform user roles/ formation of user groups	DB (MA/GB)	End of October 2021	Some work has begun in terms of the formation of user groups for Enterprise tasks. But full review of roles required.
	Recommend security checks and controls	DB	By W/E 05/11/2021	Yet to start
	Update Uniform with any changes	DB (MA)	End of November 2021	Yet to start
Set up/ code Enterprise tasks	Using model process map, identify tasks required for: <ul style="list-style-type: none"> <li>• receipt/ acknowledgement</li> <li>• triage</li> <li>• allocation</li> <li>• investigation</li> <li>• approval</li> <li>• closure</li> <li>• enforcement action</li> </ul>	DB	September 2021	<b>Complete</b>
	Draft Enterprise tasks	DB	End of October 2021	Coding work has started and is approximately 70% complete. Outstanding tasks: Circulation of report Issue final correspondence

				And Notice tasks Some other tasks require small adjustments when letter templates and user groups confirmed.
	Initial checks of tasks with enforcement team	DB	End of October 2021	1 <sup>st</sup> Initial consultation with IM/SH, covering process up to allocation – completed 30.07.2021 Need to arrange a second meeting to discuss investigation/report tasks in more detail.
	Review and update tasks	DB	By W/E 19 <sup>th</sup> November 2021	In progress
	Formal testing and feedback	DB (Testers TBC – possibly MG/AC/SH/IM)	December 2021	Yet to start
Update Uniform letter templates, including customer contact and closure statement	Review existing templates – are they still required? Are they fit for purpose?	GLC (IM/GB)	End of October 2021	Work commenced but may be influenced by Tewkesbury/Gloucester collaboration
	Identify template for updating, review content and recommend changes	GLC (IM/GB)	End of October 2021	Yet to start (dependent on previous action)
	Identify new templates	GLC (IM/GB)	End of October 2021	Yet to start (dependent on previous action)
	Create/ update templates and print menus	DB	12 <sup>th</sup> November 2021	Yet to start (dependent on previous action)

Update Uniform report templates (expediency report; DCC report)	Review existing templates – are they still required? Are they fit for purpose?	GB	End of October 2021	In progress
	Identify template for updating, review content and recommend changes	GB	End of October 2021	Yet to start (dependent on previous action)
	Identify new templates	GB	End of October 2021	Yet to start (dependent on previous action)
	Create/ update templates and print menus	DB	12 <sup>th</sup> November 2021	Yet to start (dependent on previous action)
Update Uniform Enforcement Notice templates	Review existing templates – are they still required? Are they fit for purpose?	IM (SH)	October 2021	In progress. Tewkesbury / Gloucester collaboration?
	Identify template for updating, review content and recommend changes	IM (SH)	October 2021	In progress. Tewkesbury / Gloucester collaboration?
	Identify new templates	IM (SH)	October 2021	In progress. Tewkesbury / Gloucester collaboration?
	Create/ update templates and print menus	DB	12 <sup>th</sup> November 2021	Yet to start (dependent on previous action)

**GOAL 4****Lead officer** Debra Bedwell**Provide training on new processes and comprehensive procedure guides.**

Prepare training programme and materials to deliver identified improvements including the publication of procedure guides.

OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Publish 'how to' procedure guides for business support officers	Identify any existing procedure guides that need to be updated/ culled	SW	By W/E 12/11/2021	
	Draft new procedure guides and update existing	SW	By W/E 19/11/2021	
	Test and review procedure guide	SW	December 2021	
Publish 'how to' procedure guides for compliance/ enforcement officers	Identify any existing procedure guides that need to be updated/ culled	IM (SH)	By W/E 12/11/2021	In progress.
	Draft new procedure guides and update existing	IM (SH)	By W/E 19/11/2021	In progress.
	Test and review procedure guide	IM (SH)	December 2021	Yet to start (dependent on above action)
Publish 'how to' procedure guides for managers	Identify any existing procedure guides that need to be updated/ culled	DB	By W/E 12/11/2021	
	Draft new procedure guides and update existing	DB	By W/E 19/11/2021	
	Test and review procedure guide	DB	December 2021	
Interactive demonstration sessions	Consider groups for training (e.g. support officers, enforcement officers, managers, system testers)	DB	By W/E 12/11/2021	
	Schedule appropriate group sessions	DB	W/C 15/11/2021	

	Establish number of cases required for run-through and at which stage in process	DB	W/C 15/11/2021	
	Log training cases in test system	DB	W/C 15/11/2021	
	Hold training sessions for system testers	DB	W/C 22/11/2021	
	Hold training sessions for all other users.	DB	1 <sup>st</sup> week of January - By 07/01/2022	

**GOAL 5****Lead officer** Griff Bunce**Implement new way of working.**

Introduce IT and process changes to realise business improvements.

OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Set date for implementation	Set date for new way of working to commence (current aim 1 January 2022)	GLC	Depends on progress of GOAL 3 and GOAL 4; monthly review to check progress – decision made by end of November on January launch	In progress
	Provide staff update and timeline for end user engagement	GB	End of November 2021	Yet to start (dependent on previous action)
Initial review	Set up monitor for faults, user errors	DB	End of December 2021	Yet to start
	Seek feedback from users	GB	January 2022	Yet to start (dependent on previous action)
	Consider changes and improvements	DB	February 2022	Yet to start (dependent on previous action)
	Inform of any changes and improvements; update procedure guides	GB	February 2022	Yet to start (dependent on previous action)
	Provide 'refresher' or additional training for any changes	DB	March 2022	Yet to start (dependent on previous action)
	Implement any system changes	DB	April 2022	Yet to start (dependent on previous action)

Link to adopted planning enforcement plan	Review processes against planning enforcement plan, once adopted	GB	Dependent on completion of GOAL 2. Review processes within 2 months of adoption of planning enforcement plan; this will be no sooner than Summer 2022	Yet to start (dependent on previous action)
	Consider changes and improvements	DB	Within 1 month of completed review of processes against adopted planning enforcement plan	Yet to start (dependent on previous action)
	Inform of any changes and improvements; update procedure guides	GB	Within 2 months of completed review of processes against adopted planning enforcement plan	Yet to start (dependent on previous action)
	Provide 'refresher' or additional training for any changes	DB	Within 3 months of completed review of processes against adopted planning enforcement plan	Yet to start (dependent on previous action)
	Implement any changes	DB	Within 3 months of completed review of processes against adopted planning enforcement plan	Yet to start (dependent on previous action)

**GOAL 6****Lead officer** Ian Mallinson**Develop professional training and continued professional development programme.**

Instigate a staff training and development programme to up-skill planning enforcement officers and enable a programme of continued professional development.

OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Establish current skills and knowledge	Undertaken discussion with staff	IM	October 2021	In progress.
	Manager reflection on current team skills and knowledge	IM	October 2021	In progress.
	Identification of common/reoccurring issues	IM	October 2021	In progress.
	Liaise with area planning teams to identify most common questions	IM	October 2021	In progress.
CPD for individuals	Appraisal undertaken with supervisor; individual training and development needs identified	IM	November 2021	Yet to start
	Individual training and development programme prepared	IM	November 2021	Yet to start (dependent on previous action)
CPD for team	Review of both above objectives to identify areas where there is a team/service training and development need	IM	November 2021	Yet to start (dependent on related actions)
	Programme for group learning prepared	IM	December 2021 and quarterly going forward	Yet to start (dependent on previous action)
	Programme for group learning delivered	IM	Quarterly from Jan 2022	Yet to start (dependent on previous action)

GOAL 7				
Lead officer Debra Bedwell				
Review Uniform case management tools to assist performance management.				
Identify means by which to report on key performance indicators. Introduce management tools to assist in case management.				
OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Review existing management tools/ reports	Establish if the current tools/ reports are accurate and fit for purpose	IM	End of November 2021	In progress
	Devise a team leader's 'wish list' for management tools/ reports not met by existing	IM	End of November 2021	Yet to start (dependent on above action)
	Devise a manager's 'wish list' for management tools/ reports not met by existing	GB	End of November 2021	In progress
Investigate alternative tools/ reports	Establish feasibility of meeting wish lists	DB	January 2022	Yet to start (dependent on previous action)
	Discuss options with team management	DB	February 2022	Yet to start (dependent on previous action)
	Review alternatives on feedback from team management	DB	March 2022	Yet to start (dependent on previous action)
	Recommend changes to existing or provision of new management tools/ reports	DB	March 2022	Yet to start (dependent on previous action)
Agree management tools/ reports	Consider recommendations and determine whether to proceed	GLC	April 2022	Yet to start (dependent on previous action)
	Set date for implementation	GB	June 2022	Yet to start (dependent on previous action)
	Draft report queries etc.	DB	May 2022	Yet to start

Prepare alternative tools/ reports				(dependent on previous action)
	Initial checks of tools/ reports with team management	DB	June 2022	Yet to start (dependent on previous action)
	Review and update tasks	DB	July 2022	Yet to start (dependent on previous action)
	Formal testing	DB	July/ August 2022	Yet to start (dependent on previous action)
Implement new management tools/ reports	Implement new tools/ reports	DB	Subject to above, current aim September 2022	Yet to start (dependent on previous action)
	Seek feedback from users	DB	Subject to above, current aim November 2022 (2 months from implementation)	Yet to start (dependent on previous action)
	Consider changes and improvements	GB	Subject to above, current aim December 2022 (1 month from feedback)	Yet to start (dependent on previous action)
	Implement any changes and inform users	DB	Subject to above, current aim January 2023 (2 months from feedback)	Yet to start (dependent on previous action)

GOAL 8				
Lead officer Geraldine LeCointe				
Provide public on-line access to planning enforcement register. **THIS IS A PROJECT IN ITS OWN RIGHT**				
OBJECTIVE	ACTION	RESPONSIBILITY	TIMEFRAME	PROGRESS
Provide public on-line access to planning enforcement register.  NB – public access is a statutory requirement; currently this is provided by paper files and microfiche and requires interested parties to make an appointment at the council's offices.	Identify information which should be publicly available	IM	February 2022	Yet to Start
	Identify gaps in digital data (i.e. data which is not available in Uniform)	DB	February 2022	
	Identify resource requirements to: <ul style="list-style-type: none"> <li>• make missing data available</li> <li>• realise goal</li> </ul>	GLC	March 2022	
	Define project, assess feasibility	GLC	April 2022	