

Public Document Pack



BROMSGROVE DISTRICT COUNCIL

MEETING OF THE OVERVIEW AND SCRUTINY BOARD

THURSDAY 2ND OCTOBER 2025

AT 6.00 P.M.

PARKSIDE SUITE - PARKSIDE

MEMBERS: Councillors P. M. McDonald (Chairman), S. T. Nock (Vice-Chairman), S. Ammar, A. Bailes, R. Bailes, A. M. Dale, B. Kumar, S. A. Robinson, J. D. Stanley and H. D. N. Warren-Clarke

AGENDA

- 1. Apologies for Absence and Named Substitutes**
- 2. Declarations of Interest and Whipping Arrangements**

To invite Councillors to declare any Disclosable Pecuniary Interests or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.

- 3. To confirm the accuracy of the minutes of the meeting of the Overview and Scrutiny Board held on 9th September 2025 (Pages 5 - 20)**

4. **Local Plan Consultation Methods** (Pages 21 - 30)
5. **To consider any urgent business, details of which have been notified to the Assistant Director Legal Democratic and Procurement Services prior to the commencement of the meeting and which the Chairman, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting.**

J. Leach
Chief Executive

Parkside
Market Street
BROMSGROVE
Worcestershire
B61 8DA

24th September 2025

If you have any queries on this Agenda please contact
Sarah Woodfield
Parkside, Market Street, Bromsgrove, B61 8DA
Tel: (01527) 64252 Ext: 1605
Email: s.woodfield@bromsgroveandredditch.gov.uk

GUIDANCE ON FACE-TO-FACE MEETINGS

If you have any questions regarding the agenda or attached papers, please do not hesitate to contact the officer named above.

GUIDANCE FOR ELECTED MEMBERS AND MEMBERS OF THE PUBLIC ATTENDING MEETINGS IN PERSON

Meeting attendees and members of the public are encouraged not to attend a Committee if they have if they have common cold symptoms or any of the following common symptoms of Covid-19 on the day of the meeting; a high temperature, a new and continuous cough or a loss of smell and / or taste.

Notes:

Although this is a public meeting, there are circumstances when Council might have to move into closed session to consider exempt or confidential information.



INFORMATION FOR THE PUBLIC

Access to Information

The Local Government (Access to Information) Act 1985 widened the rights of press and public to attend Local Authority meetings and to see certain documents. Recently the Freedom of Information Act 2000 has further broadened these rights, and limited exemptions under the 1985 Act.

- You can inspect agenda and public reports at least five days before the date of the meeting.
- You can inspect minutes of the Council, Cabinet and its Committees/Boards for up to six years following a meeting.
- You can have access, upon request, to the background papers on which reports are based for a period of up to six years from the date of the meeting. These are listed at the end of each report.
- An electronic register stating the names and addresses and electoral areas of all Councillors with details of the membership of all Committees etc. is available on our website.
- A reasonable number of copies of agendas and reports relating to items to be considered in public will be made available to the public attending meetings of the Council, Cabinet and its Committees/Boards.
- You have access to a list specifying those powers which the Council has delegated to its Officers indicating also the titles of the Officers concerned, as detailed in the Council's Constitution, Scheme of Delegation.

You can access the following documents:

- Meeting Agendas
- Meeting Minutes
- The Council's Constitution

at www.bromsgrove.gov.uk

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE OVERVIEW AND SCRUTINY BOARD

9TH SEPTEMBER 2025, AT 6.00 P.M.

PRESENT: Councillors P. M. McDonald (Chairman), S. T. Nock (Vice-Chairman), S. Ammar, A. Bailes, R. Bailes, A. M. Dale, B. Kumar and S. A. Robinson

Observers: Councillor E. M. S. Gray and Councillor M. Marshall

Officers: Mr. G. Revans, Mrs. C. Felton, Mr S. Parry, R Egan, McElliott, Mrs. J. Bayley-Hill, Ms. T. Ainscough, Mr M. Cox, Mr D Riley and Roche

32/25

APOLOGIES FOR ABSENCE AND NAMED SUBSTITUTES

Apologies for absence were received on behalf of Councillor J. D. Stanley.

Some Members expressed disappointment that Councillor R. Lambert did not attend this meeting as named substitute for Councillor Stanley.

The Board was advised that Councillor S. Ammar had replaced Councillor R. Hunter as a member of the Board.

33/25

DECLARATIONS OF INTEREST AND WHIPPING ARRANGEMENTS

There were no declarations of interest nor of whipping arrangements.

34/25

COUNCIL TAX RECOVERY

A presentation on the Council Tax debt recovery procedures was provided to the Board by the Revenue Services Manager. This followed a request by the Board for a report to explain the legislative framework governing council tax recovery, outline the procedures applied by the Council for council tax recovery and the use of enforcement agents, and which identified the actions the Council could take to improve the recovery process and the barriers to improvement.

It was noted that the Money and Mental Health Policy Institute (MMHPI) report titled "In the Public Interest?" argued that legislation governing council tax collection required reform and identified four areas of improvement, namely communication with individuals in debt, the speed at which council debt escalated, the over-reliance on automated procedures and lack of flexibility in dealing with debt cases and the

enforcement action used. The report clarified and responded to these areas of concern, detailing how the Council managed its debt recovery process.

After the presentation of the report, the following matters were raised by Members:

- Use of enforcement agents for council tax recovery – It was confirmed that the Council used external enforcement agents to recover debt in cases where the debtor did not engage with the Council and all avenues to obtain deductions (attachment of earnings order, deductions from benefits) had been exhausted with no success.
- The Council used two external debt enforcement agencies (bailiffs), appointed from April 2025, both entities being regulated by the Enforcement Conduct Board (ECB) and with all their enforcement agents having specialist training in identifying and handling vulnerability and mental health issues.
- Concerns were expressed about the publicised case in which one of the enforcement agents appointed by the Council had been overcharging in car parking enforcement cases. Officers clarified that this issue was identified by the company concerned, Marston Holdings, after the Council procured them as an enforcement agency and that this case was an isolated software error relating to car parking charges which was being rectified by the company and which had no effect on the council tax enforcement work carried out for the Council.
- The Revenue Services Manager explained that the Council appointed two enforcement agents in order to monitor and compare the performance of these and for the Council to have more agency in resolving issues through contact with those enforcement agencies.
- Fairness and consideration in using enforcement action – The Revenue Services Manager reiterated that the enforcement agencies contracted by the Council were regulated and professional. All enforcement agents were fully trained in identifying vulnerabilities, including if necessary to support making referrals to support agencies. It was noted that enforcement agents did wear body-worn cameras during enforcement work so that footage could be reviewed independently if required.
- It was reiterated that enforcement agents would carry out credit and address reference checks and would undertake a contact programme (telephone calls/letters/emails) before actual enforcement took place. Prior to enforcement agents being engaged, the Council would also provide opportunities for

taxpayers in arrears to discuss pay term options to suit individual circumstances.

- It was noted that Bromsgrove and Redditch Councils had a shared service for council tax recovery with the same officers employed in the department across the two councils having the same policy and adopting identical recovery processes.
- In referring to the Council's actions to prevent people falling into council tax arrears, it was noted that Bromsgrove District Council applied a discretionary council tax reduction policy of 100 per cent council tax reduction for eligible residents on low incomes.
- Members queried why council tax was demanded in 10 instalments as default and asked whether offering a 12 instalment (monthly) payment option could be more convenient for residents. Officers responded that the default option was payment of council tax in 10 instalments over the year; however, the taxpayer could make a request to pay in 12 instalments if the request was made before 15th April, and if made at a later date, the number of instalments was reduced proportionally.
- It was further explained that payment in 10 instalments allowed more time for the taxpayer to repay any short-term council tax arrears without reminders or notices having to be issued. Officers advised that the Council received 55 per cent of arrears payments over February and March.
- Council tax demand – It was clarified that although the legislation allowed the Council to charge a full year's council tax if, following a reminder notice, the payment of the outstanding amount had not been made within seven days; in practice the Council issued further discretionary reminder notices and would make further attempts to discuss payment options/instalments with the debtor before enforcing a full year's liability.
- Debt Recovery Policy Review – Members remarked that the policy should be reviewed every five years but was last reviewed in December 2016. Members were informed that the delay was due to under-capacity within the revenues team and the need to concentrate on the requirement to deliver the Government's coronavirus funding schemes during the period 2020-2023. The Revenue Service Manager stated that the next review was expected to take place in the 2026-27 financial year.
- Implementing revisions to the Debt Recovery Plan – It was stated that such revisions as introducing a pre-enforcement protocol and revised debt recovery strategy and processes could be introduced. However, this could not be undertaken at this time, due to limited resources within the Council's recovery services team (2.54 FTE staff in post managing Council Tax and Non-

Domestic Rates enforcement across Bromsgrove District and Redditch Borough). It was stated that this resource-level did not allow officers to do the checks in house and there was reliance on the private enforcement sector to carry this out for the Council.

- Finance Department Service Review – It was explained that there was an ongoing service review of the Council's Finance department, which was considering resourcing within teams including the council tax recovery team. This review was expected to be finalised by the end of the 2025/26 municipal year and it was agreed that the outcomes would be reported to the Overview and Scrutiny Board. It was stated that the service review would provide data on whether the in-house council tax enforcement resources required increasing or any changes or restructuring.
- The number of council tax debtors in relation to Bromsgrove District's population and the council tax collection rate – It was explained that the Council had generally had a council tax collection rate of over 99 per cent. As part of its finance planning, the Council assumed a 99 per cent collection rate each year.
- Some Members expressed the opinion that the review of council tax enforcement and debt recovery was not required given this affected less than 1 per cent of Bromsgrove taxpayers. Officers responded by explaining that this was part of a wider service review of the finance team and following the review it might be considered that no changes were required. Conversely, if any increase in staffing was deemed to be necessary, then a budget bid would be prepared by officers for consideration by elected members.
- Information was requested on the monetary value of council tax arrears within Bromsgrove District.
- Members requested that information be provided to Members on the number of people in Bromsgrove on special payment plans to repay council tax debt.
- A further request was received that the table at paragraph 2.31 of the report should be updated with target dates for each action and scoring of proposals by order of priority, with the revised table to be circulated to Members. In addition, there was a request that there be information provided on how the risk of a potential reduction of council tax income through the transitory period of Local Government Reorganisation (LGR) was to be mitigated.
- The concern was raised that LGR also presented a risk in terms of what council tax and other support schemes the new unitary authority would put in place for people on the lowest incomes. It was stated that a new unitary authority might decide to implement

a less generous scheme than that currently in place at Bromsgrove District Council.

- It was suggested that there could be performance measures introduced for council tax recovery, for example in terms of how residents in arrears were assisted prior to resorting to enforcement agents.

RESOLVED that the contents of the report be noted.

35/25

PLANNING ENFORCEMENT

A report on Planning Enforcement was considered by the Board. Members were reminded that the delivery of the planning enforcement was largely transferred to Worcestershire Regulatory Services (WRS) on 1st June 2024, with investigation of cases the responsibility of WRS and input provided from planning officers where their professional expertise was required. It was highlighted that prior to the formal takeover of the planning enforcement function by WRS, there had been assistance provided to the Council's planning officers with the investigation officer role since the beginning of coronavirus pandemic.

There were 302 cases of alleged planning breaches in 2024/25 which required WRS to undertake an investigation. Of these, 5 cases were assigned as priority 1 cases as they satisfied the criteria for this set out in the Enforcement Policy. Of the valid cases, 173 out of 175 were closed and resolved by informal compliance or no issue in 2024/25. There were 304 open planning enforcement cases as of September 2025.

It was stated that the backlog in open cases had fallen slightly from 320 to 304 over the most recent period. Progress in clearing the backlog was slowed by the need to establish and embed the team within Bromsgrove since 1st June 2024 and the complexity of some cases where evidence of harm (in planning terms) had been identified. The short-term additional resource available to WRS to work on clearing the backlog would end in June 2026.

In relation to the number of valid cases with Community Protection Warnings (CPWs) or Community Protection Notices (CPNs) served, it was stated that since April 2025, four additional CPWs and two additional CPNs were served.

Officers highlighted that planning policy allowed retrospective applications to be considered (i.e. applications after an action had been taken) which necessitated the maintenance of an informal approach to negotiate compliance with planning rules.

The benefits of the current approach to planning enforcement were set out including that this allowed planning officers to focus on planning matters whilst the investigation and enforcement cases were dealt with by WRS.

After the presentation, Members discussed the content of the report as follow:

A breakdown of planning enforcement cases by priority – It was requested that Members be provided with the breakdown of ongoing / live planning enforcement cases by priority level. A Member explained that currently when residents approached Members for information on how the cases were being addressed, the elected members were unable to provide an indication or timeline of when they might be actioned or resolved. It was further requested that information on the length of time these enforcement cases had been ongoing should also be shared with Members. The Technical Services Manager for WRS advised the Board that legal advice would need to be sought in relation to sharing detail on case priority as providing this information could potentially lead to identification of properties and lead to investigations being compromised.

- Case studies of successes and failures in relation to planning enforcement – A Member commented that more case studies needed to be provided for the planning enforcement cases which resulted in failure, in addition to those of enforcement successes. Officers responded that in many instances it was difficult to define cases in this way as the serving of notices could be seen as a failure where informal approaches could have led to a resolution. It was stated that in planning enforcement the informal approach needed to be maintained to work on resolving any breaches.
- Fieldwork and desktop-based investigations – A question was asked in relation to whether enforcement officers undertook visits on site to assess whether breaches of planning rules had taken place. Clarification was provided that officers liaised with informants prior to undertaking a visit. For priority 1 cases, the enforcement officer would be expected to visit the site immediately after this. For priority 2 cases, the timescales for site visits would be longer. All cases were triaged to determine priority. In each case, what needed to be established was evidence of harm in planning terms.
- Effectiveness of issuing CPNs – Some Members questioned the effectiveness of issuing CPNs in light of examples where action to repair harm had still taken considerable time following the issue of a CPN. It was noted that issuing a CPN was not appropriate in every case and the case file would be reviewed before a decision was taken on whether a CPN was appropriate in a given case. The Technical Services Manager stated that within Bromsgrove,

all CPNs issued bar one was being complied with, these mostly relating to waste-related issues.

- Frustration was expressed by some Members in relation to a perceived lack of action in respect of large-scale planning enforcement breaches within Bromsgrove. The suggestion was made that planning breaches had occurred in recent months where it was deemed that limited monitoring of planning conditions had taken place, or where the Council was not in a position to enforce planning conditions despite having itself set the conditions through the planning process. Concerns were raised that this could result in the Council letting down residents.
- Some Members felt that a review of the planning function (including planning enforcement) needed to be carried out. In response, it was explained that the Council was in the final stages of agreeing the terms of reference for the review with the Planning Advisory Service (PAS). The review was expected to start in October 2025, to commence by requesting feedback from elected members.
- Possible legal tools to address planning condition breaches – A Member queried if it was within Council's remit to prevent organisations from submitting planning applications for a certain period in cases where planning breaches were identified. Officers responded that as each planning application had to be considered on its own merits this was not possible to apply.
- Capacity to monitor compliance with planning conditions / enforcement actions – It was noted that given the volume of cases, WRS did not have the resources to routinely monitor compliance with conditions.
- The Cabinet Member for Planning, Licensing and WRS addressed the Board and reiterated that Members could contact him directly so that cases could be escalated through regular meetings between the Cabinet Member for Planning, Licensing and WRS and the respective Assistant Director.
- Cooperation between planning officers and WRS enforcement officers in dealing with cases – It was explained that the difference of approach since June 2024 had related to the prioritisation of enforcement. This ensured that resources were concentrated on the most serious breaches of planning control, where breaches were escalating or severe harm was being caused.
- In terms of cases, it was explained that investigation of a case would be undertaken and a report compiled by the WRS investigation officers with input from the Council's planning officers where their planning expertise was required. This enabled

the strongest evidence possible to be gathered. In all enforcement situations, the Council's planning officers would attempt to ensure compliance with planning rules through negotiation and persuasion. Where formal action was required, WRS Investigating Officers would complete the steps to confirm the offence and prepare formal notice.

Following consideration of this item, Members agreed that it should be recommended that there should be more information regarding planning enforcement cases including monitoring of the WRS performance through key performance indicators (KPIs). This recommendation was proposed, seconded and, on being put to the vote, approved.

RECOMMENDED that key performance indicators (KPIs) be introduced to measure Worcestershire Regulatory Services' (WRS) planning enforcement performance in Bromsgrove and that the KPIs be incorporated into monthly reporting to Members together with enhanced information on live enforcement cases data.

36/25

TASK GROUP UPDATES

There was no update provided on the Housing Task Group at this meeting as the Chairman of the group, Councillor H. Warren-Clarke, was not present.

37/25

WORCESTERSHIRE HEALTH OVERVIEW AND SCRUTINY COMMITTEE - UPDATE

Councillor Kumar provided an update on the meeting of the Worcestershire Health Overview and Scrutiny Committee (HOSC) which took place on 30th July 2025. He explained the subject discussed was routine immunisation and Members were assured that Worcestershire had high immunisation uptake with the rate significantly above the England average. Members had considered the possible implications for Worcestershire residents of travelling to Birmingham where routine vaccination rates were significantly lower than in Worcestershire.

Following the presentation, Members asked whether the views of County Councillors in relation to vaccinations had been addressed at the HOSC meeting. It was clarified that the directors from NHS England were represented on the HOSC which allowed for expert input on the matter to take place and be considered by the Members present.

RESOLVED that the Worcestershire Health Overview and Scrutiny Committee (HOSC) update be noted.

38/25

FINANCE AND BUDGET WORKING GROUP - MEMBERSHIP REPORT AND UPDATE

The update on membership of the Finance and Budget Working Group was discussed and Members were reminded that there were four Councillors currently represented on the Working Group, Councillors A. Bailes, E. Gray, P. McDonald, and S. Nock and there remained three vacant seats. It was noted that since the last meeting of Overview and Scrutiny Board, three Councillors had expressed an interest in joining the Working Group: Councillors S. Ammar, S. Colella, and C. Hotham. The Board considered these requests and on being put to the vote it was agreed that the three Councillors be appointed to the Finance and Budget Working Group.

The Chairman of the Finance and Budget Working Group, Councillor P. McDonald, updated the Board on the recent meeting which took place on 5th September 2025. The matters reported to the Board included the following:

- Members were informed that additional resource was required within the finance department. Officers expressed confidence that the costs arising could be covered from within existing budgets.
- The Council's Statements of Accounts had been brought up to date. The Council expected to receive a qualified opinion on its 2023/24 Accounts which, however, was unlikely to result in financial implications for the Council.
- At Quarter 1 2025/26, the forecast expenditure against the full-year revenue budget was an overspend of £173,000. This was expected to reduce through the year, however, there was some concern at this forecast overspend figure.
- The recharging process between the two shared service councils (Bromsgrove and Redditch) was discussed.
- Budget setting discussion took place and at the meeting Officers were proposing that the Council should revert to doing its budget in one tranche. However, it was felt by Members that undertaking the budget setting in two tranches enabled greater input by elected Members. At the Group Leaders' meeting, it had been suggested that the Council should continue to undertake its budget in two tranches.

RESOLVED that Councillors S. Ammar, S. Colella, and C. Hotham be appointed as Members of the Finance and Budget Scrutiny Working Group for the remainder of the 2025/26 municipal year.

39/25

CABINET WORK PROGRAMME

The Cabinet Work Programme for the period 1st October 2025 to 31st January 2026 was considered by the Board. It was requested as an action that information on the Council's current empty homes discounts and premiums be circulated to Members.

RESOLVED that the content of the Cabinet Work Programme for the period 1st October 2025 to 31st January 2026 be noted.

40/25

OVERVIEW AND SCRUTINY BOARD WORK PROGRAMME

The Overview and Scrutiny Board's Work Programme was considered by Members.

A request was made to add to the work programme an item to review the consultation platform that was being used for the current Draft Development Strategy (Local Plan) consultation. Concerns were raised by Members in regard to the quality and ease of use of the platform and it was requested that information on the costs of obtaining the platform, details of testing done prior to release for public consultation, information about the functionality of the platform and the lessons learned from the implementation of the platform should be provided in a report to Overview and Scrutiny. It was requested that this be considered by the Overview and Scrutiny Board at its next meeting.

Members commented that, given the circumstances and importance of the Draft Strategic Development Plan Consultation, an urgent decision should be made to extend the consultation period. In this context, Members proposed that this item should be considered as urgent business at the Cabinet meeting due to take place on 10th September. It was noted that the consultation was currently due to finish on 22nd September and it was imperative that time was allowed for a decision to take place prior to the end of consultation.

The Board received advice from the Monitoring Officer on how urgent business could be reviewed by Cabinet and still comply with access to information rules. Members deliberated on the wording of the recommendation and the Board formulated the proposal that the Chairman of the Overview and Scrutiny Board submit a request on behalf of the Board asking that Cabinet discuss as an item of urgent business whether to extend the current public consultation period for the Draft Development Strategy Consultation. This recommendation was proposed, seconded and on being put to the vote agreed.

RECOMMENDED that the Chairman of the Overview and Scrutiny Board submit a request on behalf of the Board that Cabinet consider, as an item of urgent business, whether to extend the current public consultation period for the Local Plan.

41/25

OVERVIEW AND SCRUTINY ACTION SHEET

The Overview and Scrutiny Action Sheet was considered by Members.

Members discussed the action regarding the profit share arrangements with Electric Vehicle (EV) charger providers in Bromsgrove, Zest. It was raised by the Chairman that previously the Board was advised that some

authorities had contracts in place where immediate revenue profit sharing took place with the EV charger suppliers and that as per the response provided in the action sheet, this was not the case in relation to the Council's contract with Zest. Members asked Officers to explore further the potential for there to be a profit-sharing arrangement in place in future. The Assistant Director Environmental and Housing Property Services explained that advice would be sought on this matter.

RESOLVED that the Overview and Scrutiny Board Action Sheet be noted.

42/25

TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIRMAN, BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT MEETING.

There was no urgent business for consideration.

43/25

TO CONSIDER, AND IF CONSIDERED APPROPRIATE, TO PASS THE FOLLOWING RESOLUTION TO EXCLUDE THE PUBLIC FROM THE MEETING DURING THE CONSIDERATION OF ITEM(S) OF BUSINESS CONTAINING EXEMPT INFORMATION:-

RESOLVED: that under Section 100 I of the Local Government Act 1972, as amended, the public be excluded from the meeting during the consideration of the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of scheme 12A to the Act, as amended, the relevant paragraph of that part, in each case, being as set out below and that it is in the public interest to do so:-

Item No	Paragraph
13	3
14	3
15	3

44/25

EXPANSION OF COMMERCIAL WASTE COLLECTION SERVICE - PRE-SCRUTINY

A report was presented detailing proposals for the expansion of the Council's commercial waste collection service. It was stated that the provisions of the Environment Act 2021, with businesses being required to separate food waste (and microbusiness due to be required to do the same from April 2027), afforded increased opportunities for service growth, as there would be growth in demand for commercial food waste services.

It was highlighted that the Council's Commercial Waste Collection Service had expanded considerably since its inception in 2015 and there was a risk that in excess of £800,000 annual income would be placed at risk if the Council could not provide a compliant service.

The Cabinet Member for Environmental Services and Community Safety addressed the Board and stated that this request for funding was well documented. The Cabinet Member stated that the commercial waste service had been a profit-maker for the Council and only recently saw increased costs as a result of wider fleet and maintenance issues within the service. The recommendations in the report were designed to address this with the purchase of two refuse collection vehicles (RCVs) designed to reduce reliance on hire vehicles in the long term. The requirement for businesses to separate food waste provided an opportunity to expand the commercial waste collection service.

Following the presentation, Members discussed some aspects of the report as follows:

- The effect of Local Government Reorganisation (LGR) on service delivery – It was explained that the duty to collect commercial waste would be unaffected by LGR and a number of neighbouring authorities were also undertaking expansion of their commercial waste services in anticipation of additional requirements on businesses from 2026/27. It was reported that the Council's commercial waste service had built a strong reputation with local businesses and this provided a good starting point for the LGR reorganisation when the independent commercial waste teams operated by District Councils in Worcestershire would be merged into either one or two considerably larger teams.
- It was clarified that the figures included in the report were for Bromsgrove District Council only as of the two shared service authorities (Bromsgrove and Redditch) only Bromsgrove had a commercial waste service.
- The reasons for Dudley Metropolitan Borough Council (DMBC) exiting the commercial waste market – Officers explained that DMBC was geared primarily towards general waste services and their pricing structure was low, meaning it would be unsuitable to replicate in Bromsgrove.
- The space needed for additional fleet vehicles at the Council's Depot – It was reported that Officers had considered how to better utilise space at the Depot and additional space had been found to accommodate the two Refuse Collection Vehicles (RCVs).

Following the consideration of the subject, the recommendations as set out in the report were endorsed by the Board.

RECOMMENDED that

- 1) Capital Funding of £489,760 be added to the Capital Programme for 2026/27 to purchase two Refuse Collection Vehicles (RCV's).
- 2) The Council allocates capital funding of £35,000 annually in the Medium-Term Financial Plan from the 2025/26 financial year to fund wheeled bins for Commercial Services.
- 3) The Council allocate £334,342 Revenue Funding in the Medium-Term Financial Plan to fund operational costs of providing the expanded service from 2025/26.
- 4) The Council allocate £100,000 Revenue Funding in the Medium-Term Financial Plan across 2025/26 and 2026/27 for interim vehicle hire.

(During consideration of this item, Members discussed matters that necessitated the disclosure of exempt information. It was therefore agreed to move to exclude the press and public prior to any debate on the grounds that information would be revealed that included information relating to the financial or business affairs of any particular person (including the authority holding that information)).

45/25

WINDSOR STREET (OPTIONS PAPER)

The Regeneration Project Manager presented a report on the options for the delivery of housing on the Windsor Street site in Bromsgrove. This paper was submitted for discussion by Overview and Scrutiny Board prior to consideration of the report by Cabinet in November.

The Regeneration Project Manager recapped on the details in relation to the Windsor Street site development. It was noted that the site had stood derelict since 2014 and that Council had been successful in obtaining £3,490,000 for the redevelopment of the site from various sources. No Bromsgrove District Council funding had been used in the project to date.

It was noted that residential use was considered as most appropriate for the site, and only development opportunities for housing had been considered in this report. The three potential delivery options were set out as follows:

- Option A: Obtain outline planning permission and dispose of the site on the open market
- Option B: Develop through Spadesbourne Homes Ltd and retain market value properties (dispose of affordable units)
- Option C: Enter into partnership with a private developer or a registered social landlord (RSL).

Members discussed and evaluated the three potential delivery options for the Windsor Street site and in doing so commented on the following:

- Option C, to enter into partnership with a RSL, was identified as a preference by the majority of Members present.
- Some Members expressed the opinion that the option to transfer to an RSL would protect the site from being sold off. The option would also secure the most affordable housing units.
- A Member asked if development of mixed housing / entertainment venue(s) was possible on the site. Officers replied that given the size of the site, it would not be financially viable to provide mixed use on the Windsor Street site. However, the Nailers Yard site would be utilised for mixed use.
- The building of flats was considered but it was identified by Officers that the greatest demand in the District was for 2- and 3-bedroom houses.
- Some Members expressed strong disapproval of the proposal to build houses on the site and argued that, given there was a recognised demand for young people to have affordable opportunities to enter the housing market, small flats should be provided on the site.
- A Member noted it was important to verify how many young people with demand for flats or maisonette-type properties were on the Council's housing waiting list.
- Given the site's location in Bromsgrove Town Centre, it was suggested by some Members that this should be a car-free sustainable development as there were transport links available (with Birmingham via train etc.) and car club / car share opportunities.
- A Member expressed the view that the site could deliver 50 dwellings rather than the 29 units as per current calculations if housing was built. It was argued that this development provided an opportunity to encourage town living which was most suited to longer-term sustainability and that this development was an opportunity to shape the Local Plan. Allowing for 50 units would also likely result in more private developers expressing interest in the site.
- Other Members argued that there should be some parking provision allowed for in the development and that there could be a mixture of properties with and without parking.

- The suggestion was made to consider the residents with disabilities on the housing register and to check with the housing associations on the specific needs of people with disabilities and whether this could be accommodated as part of this development.
- It was clarified by Officers that at this stage, the make-up of housing types on the site had not been determined and this report only concerned the preferred delivery option.
- Indicative layout of the site – Members were advised that there was a right of way running through the houses and a listed building near the site and consideration had to be given to the scale and massing of the buildings on site.

RESOLVED that the contents of the report be noted.

[Following consideration of this item, the meeting was adjourned between 9.00pm and 9.07pm].

(During consideration of this item, Members discussed matters that necessitated the disclosure of exempt information. It was therefore agreed to move to exclude the press and public prior to any debate on the grounds that information would be revealed that included information relating to the financial or business affairs of any particular person (including the authority holding that information)).

46/25

TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE OVERVIEW AND SCRUTINY BOARD HELD ON 22ND JULY 2025

The minutes of the meeting of the Overview and Scrutiny Board held on 22nd July 2025 were considered.

Councillor A. Bailes asked for the record to be clarified in relation to Minute No. 20/25 – Bromsgrove Town Centre Strategic Framework. Councillor A. Bailes commented that he recalled a recommendation to Cabinet having been agreed in relation to inclusion of town centre living within the Bromsgrove Town Centre Strategic Framework and the Local Plan.

It was agreed that Officers would review the record of the meeting of the Overview and Scrutiny Board held on 22nd July 2025 to verify if this recommendation had been tabled and agreed. It was noted that inclusion of town centre living was currently recorded as an action for consideration by Officers.

RESOLVED that, subject to clarification of the query raised in the pre-amble above, the minutes of the Overview and Scrutiny Board meeting held on 22nd July 2025 be agreed as a true and correct record.

Agenda Item 3

Overview and Scrutiny Board
9th September 2025

The meeting closed at 9.17 p.m.

Chairman

Overview and Scrutiny Board 2025

2nd October

Local Plan Consultation Methods

Relevant Portfolio Holder	Councillor Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Ruth Bamford
Report Author	Job Title: Mike Dunphy – Strategic Planning & Conservation Manager email:m.dunphy@bromsgroveandredditch.gov.uk Contact Tel: 01527 81325
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Economic Development Environment Housing Infrastructure
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Overview and Scrutiny Board note the report.

2. BACKGROUND

- 2.1 During an Overview and Scrutiny Board meeting held on 9th September 2025, Members agreed to scrutinise the approach to consultation used for the Local Plan, including the use of an online consultation platform, at a future meeting. Members were keen for the Board to consider this matter ahead of the deadline for the extended Bromsgrove Local Plan consultation period, which closes at 5pm on 20th October 2025.
- 2.2 The purpose of this report is to provide an overview of the current methods of public consultation for the Local Plan, including the online consultation platform, and to learn lessons for future consultation exercises. These were areas raised by the Board at its meeting on 9th September 2025.

Overview and Scrutiny Board 2025

2nd October

3. OPERATIONAL ISSUES

- 3.1 At an extraordinary Council meeting held in June 2025, Members agreed that the Bromsgrove District Local Plan Draft Development Strategy Consultation be approved, for a period of public consultation between 30th June and 22nd September 2025. A decision was subsequently taken, through the urgent decision process, to extend the deadline for the consultation period to 5pm on 20th October 2025.
- 3.2 For previous iterations of the Local Plan, the Council has held public consultation exercises in line with our published Statement of Community Involvement . On these occasions, residents were able to submit feedback to the Council, in writing via email or post or submitting written feedback in person drop in events. These consultation methods have remained in place in 2025 and have already been used by various residents to submit feedback in the current consultation process.
- 3.3 In addition to the existing consultation methods, following presentations at the Strategic Planning Steering Group, officers arranged for an online consultation platform to be made available. This platform provides residents with an additional way to submit feedback during the consultation period. It complements the previously used methods and offers the public another opportunity to engage with the development of the Local Plan and share their views.
- 3.4 Recent governments have stressed the need for using online engagement tools in plan making. The introduction and greater reliance on digital consultation platforms was mooted through the Government's 'Planning for the Future' White Paper in 2020.
- 3.5 Part of the White Paper's Vision was to modernise the plan-making process, with greater public engagement in the planning process. This would give neighbourhoods and communities an earlier and more meaningful voice in the future of their area as plans are made, harnessing digital technology to make it much easier to access and understand information about specific planning proposals. For plan-making, key aspects of the Vision included the use of new digital engagement processes to make it radically easier to raise views about and visualise emerging proposals whilst on-the-go on a smart phone, for example
- 3.6 This principle was introduced into the NPPF in July 2021:

Para 16 Plans should... (e) be accessible through the use of digital tools to assist public involvement and policy presentation.

Overview and Scrutiny Board 2025

2nd October

- 3.7 At the Overview and Scrutiny Board meeting held on 9th September 2025, Members raised concerns about difficulties some members of the public had reported to them with accessing the consultation platform. It was suggested that one way to address this issue would be for Members to act as a liaison between the public and Planning Officers, to help facilitate and support effective participation in the consultation process. This approach was something which was stressed at the outset of the consultation at the Strategic Planning Steering Group on the 29th May where officers outlined all the methods of consultation, and encouraged members to take an active role and keep officers informed of any issues being faced. Members have more recently been reminded to notify officers of any specific experiences that were reported to them by residents so that Officers could work with those residents to ensure that their feedback could be submitted prior to the consultation deadline.
- 3.8 Data available to the Council indicates that the online consultation platform is the preferred method for many consultees to submit their responses. At the time of writing, we have had 26,847 unique visitors to the website, which has resulted in 2385 people providing 5811 contributions. This compares favourably to the other methods of consultation. We have had just over 1000 emails to bromsgroveplan@bromsgroveandredditch.gov.uk of which a significant proportion appear to be the same response sent in by objectors to one particular site. We have also had nearly 100 hard copy written letters.
- 3.9 In summary we have had approximately 7000 responses with over 4 weeks still to run at the time of writing, this is considerably more than we have had for any local plan consultation we have held in the past. In fact, it is considerably more than we had for the whole consultation processes for the last local plan which contained multiple consultation events, and a public representation period prior to the Examination in Public.
- 3.10 In addition to the above officers are aware of concerns being expressed that people are being put off responding by the online platform, and as result not responding. The figures below show how the Bromsgrove platform compares with other campaigns being run on the same platform.

Overview and Scrutiny Board 2025

2nd October

	Visitors	Respondents	Contributions	Conversion Rate	# of contributions per respondent
Bromsgrove Local Plan	26,847	2,385	5,811	9.8%	2.4
A Local Plan in the West Midlands	30,518	1,708	4,825	5.60%	2.8
A Local Plan in South East England	37,248	3,105	11,341	8.34%	3.7
A Local Plan in the East of England	44,186	1,262	3,124	2.86%	2.5
A Local Plan Reg 19 in South West England	7,210	912	2,101	12.65%	2.3
A Local Plan Reg 19 in South West England	7,327	292	503	3.99%	1.7

- 3.11 As can be seen, the results vary and it must be considered the above table is showing figures from the Bromsgrove consultation which hasn't closed, compared to consultations that have closed. The significant figure above is the conversion rate, which shows the % of people who have accessed the platform who then submit a comment. The 9.8% figure for Bromsgrove compares favourably with all but one of the other consultations. The platform provider has assessed our conversion as being good, with a 12-14% rate being exceptional. When looked at over the last month of the current consultation, our conversion rate has risen to 13.33% and up to 15.2 in the week before this report was produced.
- 3.12 Members are asked to note that frequently in public consultation exercises, a significant number of submissions are not received until close to the deadline date. Therefore, the figures provided in this report only relate to submissions received as of 19th September 2025,

Overview and Scrutiny Board 2025

2nd October

in time for inclusion in a report for publication in the agenda for this meeting.

- 3.13 The conversion rates for websites vary by sector with most sectors having much lower conversion rates than we are experiencing. Therefore with 4 weeks left to run on the consultation, the data is showing that the online platform is performing well, as part of the overall package of consultation efforts, and has propelled the local plan to a level of engagement vastly superior to anything we have seen before.
- 3.14 During the consultation, Officers have also been keeping a log of concerns being raised via emails or phone calls, at the time of writing there have been 11 people reporting issues directly. Of these 11, one was a technical issue which was preventing some files type from being uploaded where the file extension was capitalised (I.e. .JPG rather than .jpg), this issue was reported to the supplier and quickly resolved. Given that the lowercase extensions functioned correctly, there is no evidence to suggest it prevented other people from submitting comments or uploading files. Other issues appeared to be 2 instances of confirmation emails not being received, other reports of this nature have been made but were subsequently found in junk/spam folders. The remaining reports of problems appear to have been users not fully understanding how the system works or differing expectations on functionality. Whilst it is unfortunate that we have had some issues reported to us, it represents only a tiny fraction of those who have used the platform. We continue to stress that if people need assistance they can email or call us and we will help.
- 3.15 In addition to the online platform it cannot be overlooked that between 14th July and 9th September officers carried out 19 different in person consultation events, this represents well over 1000 hours of officer time available to the public to speak with officers and engage with the local plan process. These events have varied, with some being very well attended and others, predominantly in the areas where there isn't development being proposed, being much quieter events. The themes being expressed at these events are very similar, with the main concern being about the infrastructure required to support development. The occasions where people have criticised the online platform have been very limited to only a few isolated incidents out of the thousands of conversations that took place. The Council's communications team have confirmed that on the Council's social media accounts there are also very few instances of people reporting issues with the online platform.

Overview and Scrutiny Board 2025

2nd October

3.16 A broad communications strategy set out to raise awareness of the consultation, highlight its importance to the district's future, and make it easy to respond. We set out to do this by ensuring 1) it was well represented in the channels available to us (councillors, press/news, public facilities, social media, printed materials, staffed events, mailing lists, stakeholder relationships); 2) it had strong and consistent key messages (planning for future generations, need you to help tell us what you think the issues are, etc); and 3) it had strong calls to action to easily-accessible consultation tools at all times (lots of strong printed materials, e-mailshots direct to subscribers, optimised web journeys and search engine optimisation including heavy use of QR codes, especially to provide respondents with access to the platform which we had identified as having significantly more potential to provide substantially increased accessibility to the consultation for the average user than any of our other traditional paper and/or established digital methods).

3.16 It is helpful to review the use of the online consultation tool because it is likely that the Council will aim to use more ICT tools and software for future consultation activities. Any findings arising from discussions at this meeting will be taken on board for the future.

4. FINANCIAL IMPLICATIONS

4.1 There are no financial implications associated with this report

5. LEGAL IMPLICATIONS

5.1 The procurement of the online platform was carried out through the G-Cloud framework, a compliant government route provided by Crown Commercial Service.

5.2 A Data Protection Impact Assessment, has been carried out and the Council's ICT/Information Management teams is satisfied that data storage is fully compliant. It should be noted that the platform provider has been used by a number of Local Authorities and has been held as an example of good practice by the Government's Proptech Innovation programme.

6. OTHER - IMPLICATIONS

Local Government Reorganisation

6.1 As recently as 3rd June, the Ministry of Housing, Communities and Local Government (MHCLG) wrote to Chief Executives of the

Overview and Scrutiny Board 2025

2nd October

Worcestershire Councils with an update on Local Government Reorganisation. Included within that letter is the following statement:

'The Government also recognises that developing proposals could distract councils from their essential day-to-day activities. However, residents and businesses depend on councils to deliver crucial services and to continue the efforts needed to establish successful new unitary councils. This is particularly important for advancing local plans to allocate land for new homes. As mentioned in the invitation letters, the Government expects local planning councils to work towards adopting an up-to-date local plan as soon as possible. Local Government Reorganisation should not hinder this vital work, nor should the introduction of the new legal framework for local plan-making later this year or our strategic planning reforms. Significant financial support has already been provided to eligible councils to aid in plan-making, and we encourage councils to utilise additional support available through the Local Government Association's Planning Advisory Service.'

- 6.2 The current public consultation exercise should help the Council to proceed with work on the Local Plan in line with the Government's expectations.

Relevant Council Priority

- 6.3 The Bromsgrove District Local Plan Draft Development Strategy Consultation 2025 is relevant to the following Council priorities:

1. Economic Development
2. Housing
3. Environment
4. Infrastructure

Climate Change Implications

- 6.4 The Local Plan will have significant implications for climate change, shaping the location and nature of new housing, employment, and infrastructure development.
- 6.5 The provision and use of an online consultation platform should have a positive impact on carbon emissions associated with public consultation events. As a consequence, those members of the public who do submit comments electronically, may be less likely to travel to

Overview and Scrutiny Board 2025

2nd October

attend in person consultation events, thereby reducing carbon emissions.

Equalities and Diversity Implications

- 6.6 The consultation process is open to all to comment in multiple ways, both online and in hard copy. Consultation events have also taken place in a variety of locations and at different times of the day. Every effort is being made to ensure that the Council reaches the widest amount of people and organisations as possible.

7. RISK MANAGEMENT

- 7.1 As stated above, the Government has stated that all Local Government Authorities must have an up-to-date Local Plan. The Council approved its Local Development Scheme in February 2025, which sets out the plan-making timetable in order to achieve an up-to-date local plan. The public consultation is in-line with this timetable.
- 7.2 The risk of not progressing to a new Local Plan is being managed by undertaking this consultation. Should the timetable not be kept to in the future, there is a risk of intervention by MHCLG, as outlined in the report accompanying the Local Development Scheme.
- 7.3 On 16th September the Minister of State for Housing and Planning wrote to Stockport Borough Council in response to them not meeting the targets they had set out in their Local Development Scheme and against a poor backdrop of plan making. This clearly shows that government is not afraid to intervene where necessary the conclusion of this letter is as follows.

For the reasons set out above, I have concluded that to ensure full and effective coverage of Stockport Council area by a development plan, I am justified in using the Secretary of State's powers provided in section 15(4) of the 2004 Act, and I am subsequently directing Stockport Council to amend their Local Development Scheme by 10 October 2025 as follows:

- *Regulation 18 consultation should be completed by no later than 24 December 2025;*
- *Regulation 19 consultation should be completed no later than 1 September 2026;*

Overview and Scrutiny Board 2025

2nd October

- *Submission of the plan for examination should be no later than 30 November 2026. An amended LDS should be published by Stockport Council by 10 October 2025.*

I will be asking my officials to liaise with you on this matter on a regular basis and to provide me with updates on your progress. Should you fail to comply with the direction in this letter, or should you delay progress of your emerging draft plan in relation to the amended LDS milestones, I will consider whether I need to take any further action.

8. **APPENDICES and BACKGROUND PAPERS**

Bromsgrove District Local Plan Consultation Web Pages:

<https://bromsgroveplan.commonplace.is/>

www.bromsgrove.gov.uk/bromsgroveplan

9. **REPORT SIGN OFF**

Department	Name and Job Title	Date
Portfolio Holder	Councillor Kit Taylor	23/9/25
Lead Director / Assistant Director	Ruth Bamford	24/9/24
Financial Services	Deb Goodall	19/9/25
Legal Services	Claire Felton and Nicola Cummings	23/9/25
Procurement	Carmen Young	19/9/25
Policy Team (if equalities implications apply)	Rebecca Green	22/9/25

Overview and Scrutiny Board
2025

2nd October

--	--	--