

# **Overview and Scrutiny Board**

**2025**

**2<sup>nd</sup> October**

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## **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 9<sup>th</sup> 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 20<sup>th</sup> 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 9<sup>th</sup> September 2025.

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### **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 30<sup>th</sup> June and 22<sup>nd</sup> September 2025. A decision was subsequently taken, through the urgent decision process, to extend the deadline for the consultation period to 5pm on 20<sup>th</sup> 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.

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- 3.7 At the Overview and Scrutiny Board meeting held on 9<sup>th</sup> 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 29<sup>th</sup> 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](mailto: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.

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	Visitors	Respondents	Contributions	Conversion Rate	# of contributions per respondent
<b>Bromsgrove Local Plan</b>	26,847	2,385	5,811	9.8%	2.4
<b>A Local Plan in the West Midlands</b>	30,518	1,708	4,825	5.60%	2.8
<b>A Local Plan in South East England</b>	37,248	3,105	11,341	8.34%	3.7
<b>A Local Plan in the East of England</b>	44,186	1,262	3,124	2.86%	2.5
<b>A Local Plan Reg 19 in South West England</b>	7,210	912	2,101	12.65%	2.3
<b>A Local Plan Reg 19 in South West England</b>	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 19<sup>th</sup> September 2025,

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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 14<sup>th</sup> July and 9<sup>th</sup> 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.

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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 3<sup>rd</sup> June, the Ministry of Housing, Communities and Local Government (MHCLG) wrote to Chief Executives of the

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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

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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 16<sup>th</sup> 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;*



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- *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](http://www.bromsgrove.gov.uk/bromsgroveplan)

### **9. REPORT SIGN OFF**

<b>Department</b>	<b>Name and Job Title</b>	<b>Date</b>
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

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