B R O M S G R O V E D I S T R I C T C O U N C I L

MEETING OF THE OVERVIEW AND SCRUTINY BOARD

2ND OCTOBER 2025, AT 6.00 P.M.

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

Observers: Councillors K. May – Leader and Cabinet Member for Strategic Partnerships, Economic Development and Enabling, K. Taylor – Cabinet Member for Planning, Licensing and Worcestershire Regulatory Services (WRS) and D.J. Nicholl.

Officers: Mr. G. Revans, Mrs. R. Bamford, Mrs. J. Bayley-Hill, Mr. M. Dunphy and Mrs S. Woodfield

47/25 **APOLOGIES FOR ABSENCE AND NAMED SUBSTITUTES**

Apologies for absence were received on behalf of Councillor R. Bailes with confirmation provided that Councillor S.R. Colella was attending as her named substitute. Apologies for absence were also received for Councillor H.D.N. Warren-Clarke.

48/25 **DECLARATIONS OF INTEREST AND WHIPPING ARRANGEMENTS**

There were no declarations of interest nor of whipping arrangements.

49/25 **TO CONFIRM THE ACCURACY OF THE MINUTES OF THE MEETING OF THE OVERVIEW AND SCRUTINY BOARD HELD ON 9TH SEPTEMBER 2025**

The minutes of the meeting of the Overview and Scrutiny Board held on 9th September 2025 were considered.

Members highlighted that Councillors K. May, S. Baxter and K. Taylor, as the portfolio holders, were not listed as attendees to the meeting but had been present and spoken at the meeting. Members agreed that this was a typographical error to note in relation to the minutes of the meeting.

A suggestion was made that an additional sentence should have been included in respect of minute no. 35/25 – Planning Enforcement reflecting inappropriate language that was alleged to have been used by a Member in attendance at the meeting. The suggestion was made by some Members that where inappropriate language was not included, the

accuracy of the minutes might be questionable. However, Members were reminded to note that the minutes of meetings held at the Council were not verbatim.

The Chairman requested that in future, where Members had concerns about the minutes, they should contact Officers with regard to the matter in advance of a meeting.

RESOLVED that, subject to the amendments detailed in the preamble above, the minutes of the Overview and Scrutiny Board meeting held on 9th September 2025 be approved as a correct record.

50/25 **LOCAL PLAN CONSULTATION METHODS**

A presentation on the Local Plan Consultation Methods was provided to the Board by the Strategic Planning and Conservation Manager. This followed a request by the Board at a recent meeting held on 9th September 2025, for a report 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.

The following key points were highlighted to Members:

- The consultation was being conducted in line with the Statement of Community Involvement.
- A new digital platform had been introduced, enabling online responses to be submitted alongside traditional consultation methods such as in writing via email, post or submitting written feedback at drop in events.
- The digital platform was in line with National Planning Policy Framework (NPPF) requirements, as specified by Government for the public to engage digitally.
- The platform had attracted nearly 30,000 visitors and generated approximately 7,000 responses, with a conversion rate currently standing at of 8.9% which compared favourably with other consultations.
- The bounce rate (the percentage of visitors who viewed only a single page before leaving, indicating a single page session without further interaction), also compared well to other online platforms.
- To date, 78% of respondents had been aged over 55.
- There had been limited engagement from younger demographics.

- The consultation process still had a few remaining weeks of engagement left to complete. Therefore, the statics and data would vary at completion.
- There had been a small number of issues identified with the consultation platform, with only one reported as technical, however, issues had been minimal and quickly resolved.
- Feedback indicated that some users may have anticipated more advanced functionality than the software currently offered.
- Data available to the Council indicated that the online consultation platform was the preferred method for many consultees to submit responses.
- The platform had been procured via the Government's G-Cloud framework and built in-house by the Council's planning team with support from the platform providers.
- Quality assurance exercises were conducted prior to the launch and minor updates had been made after the launch to the Council's website pages dedicated to the consultation, such as amendments to the Frequently Asked Questions (FAQs), the introduction of how-to videos and the addition of emoticons.
- The team were developing internal systems to manage and analyse the data efficiently.

After the presentation, Members provided key considerations as follows:

- Members requested clarification of how the software, provided by the developer, had been adapted in-house. – In response, it was explained that the developers had agreed on a set of core, basic elements for the software. The structure was then refined to enhance user friendliness, while certain features were deliberately removed as they were considered unnecessary.
- It was queried if there was consistency in the reporting when comparing statistical analysis to other local authorities, considering the uniqueness of the software. - Officers explained that although some elements were different, the platform provided useful guidelines to assist the user, if required.
- With approximately 30,000 visits to the site but only 7,000 responses, Members suggested results were fairly low and queried if individuals had been contacted who had visited but not submitted a formal response. – The Board was informed that communications had been issued to inform the public of the extension period and to encourage incomplete responses.

Officers also expressed the view that the platform was performing well and had exceeded expectations in terms of engagement.

- Some Members suggested the online platform risked repetition and framed questions in a way that might be viewed as which steering responses rather than allowing open, structured feedback. Members were reminded that the questions included in the consultation were those which had been reported to the Council meeting held in June 2025.

- Suggestions of a lack of transparency and accountability, unlike traditional methods which created a clear audit trail, were also raised by the Board. – In response, Officers explained that responses could be short, complex or technical to drive as much engagement as possible. Members were also asked to note that all responses, regardless of format, would be read and included in the consultation statement.

- It was queried whether the platform was suitable for non-professional users and whether it might potentially exclude vulnerable groups or people without internet access. – However, Officers highlighted that, as reported, the conversion rate was rated high compared to all but one of the other consultations listed in the report. Traditional methods were available as an alternative for users, however, the vast majority of people engaging using the online platform method, were aged over 55.

- Concerns were raised that issues were being reported to Members and that Officers seemed unaware. As a consequence, it had been necessary for some Members to hold ward member engagement meetings to assist the public with the online platform. – In response, Members were encouraged to report the specific issues to enable Officers to assist individuals with their queries.

- Requests were raised for further detailed demographic analysis in respect of the responses received. – Officers advised that a Consultation Statement would be produced to outline how the consultation process was conducted and how responses would be reported. The statement would include relevant statistical analysis where the data was sufficiently robust. The Board was asked to note that the consultation had been carried out across the entire District.

- Members queried whether responses would still be recorded, if demographic fields on the online platform were not completed, given that these fields were part of the submission process. - Officers clarified that whilst the demographic information was useful for analysis, it was not mandatory. The Board also noted that individuals submitting responses by letter or email would not typically provide this information.

- Clarification was requested on how consultation responses would be weighted and analysed, particularly in cases where users were unable to complete their submissions. - Officers explained that responses could vary in length and complexity and that the consultation was designed to encourage as much engagement as possible. All responses, regardless of format, length, or completeness, would be read, considered and included in the final Consultation Statement.

- The Board raised questions regarding the transparency of the process and whether an independent review would be undertaken. - Officers clarified that the Council's role was to present the evidence gathered to the Planning Inspectorate, which was standard practice for all Local Authorities. It was also noted that the most appropriate independent planners were Council Officers. Furthermore, Members were informed that if any concerns arose regarding the consultation process, there was a right of appeal through the Secretary of State.

- A Member reported having received one concern from a resident regarding difficulties in submitting and completing the consultation and queried whether similar issues had been reported more widely. - Officers responded that there had been very few such reports and it was noted that the issue in question may have been the result of user error.

- Members suggested ways to enhance engagement, particularly with younger people and vulnerable groups including outreach to schools, collaboration with organisations such as Age UK and utilising the Council's Communications Team to explore social media channels. The Board also queried how other Local Authorities had successfully engaged these demographics. - In response, Officers acknowledged that historically, younger people had shown limited engagement in the plan making process, potentially due to lower home ownership rates. Members were also informed that some school engagement had already taken place, with further targeted efforts planned.

- The Board queried whether sufficient resources were in place to manage and evaluate the large volume of consultation responses received. - Officers assured Members that robust testing procedures had been implemented with the appropriate technology being used to streamline the process. It was also confirmed that the need for additional resources would be assessed and addressed if necessary.

- Some Members expressed concerns, suggesting that the consultation platform might be viewed as favouring developers. - Officers clarified that this was a public consultation and all interested public stakeholders, including developers, were eligible

to respond. While developer participation was expected, it was standard practice and not unique to the consultation. In addition, Members were reminded that the Bromsgrove District Local Plan Draft Development Strategy Consultation had been approved by Council at its meeting on 19th June 2025. In response, some Members expressed the view that there should have been an additional stage in the process to allow political groups the opportunity to collaborate on a more composite plan.

- Clarification was sought on whether the consultation constituted a new call for sites. – It was explained that part of the planning consultation process was to include a call for new sites. During discussions, following further discussions on this point, Members requested that it be noted in the minutes that as part of the consultation process, the public, including developers, could submit suggestions about potential new sites as this was how the planning system worked. Furthermore, it was confirmed that if Members wished to refer to this as another call for sites then they could do so.

- Questions were raised about the number of respondents who had completed answers to all of the questions included on the online consultation platform and the implications arising for submissions where answers were not provided to all of the questions. Officers clarified that the consultation process had been designed in such a way to enable the public to respond to as many questions as they wished and there was no requirement for answers to be provided to all questions. All such responses, including responses to only a small number of questions, would be taken into account and analysed when the final consultation feedback was assessed.

- Members expressed frustration that requests had been raised in meetings of the Strategic Planning Steering Group, such as for infrastructure plans but that these had not been provided.

- Questions were raised about why letters had not been sent to all residents within the district at the start of the consultation process to assist with maximum engagement. - Officers explained that doing so would have had significant cost implications. It was also highlighted that over 30,000 individuals had accessed the website, representing a substantial level of engagement.

- A member raised a typographical error suggesting the Conversion Rate should be recorded as 8.9% and not 9.8%.

- Members queried whether it was a fair comparison to evaluate responses from a Local Plan Regulation 19 consultation when the Council was still at the Regulation 18 stage. - Officers explained that whilst full details of other consultations could not be

disclosed, there were still valid and fair examples available for comparison.

- Concerns were raised about the potential risk of documents referenced during the consultation process being out of date. - Officers clarified that while some documents may be older, they were not necessarily considered out of date or irrelevant to the current consultation process.

- The Board requested information on how many developers had submitted speculative planning applications during the consultation period. - Officers explained that it was not within the Council's control to determine whether developers chose to submit speculative applications, as this depended on their individual resources and approach. However, if speculative applications were submitted, the Council would address them accordingly.

- Discussions were held regarding the timing of the consultation during the Summer period, with suggestions being made by some Members that it may have impacted participation levels. - Officers responded that selecting a universally suitable time was challenging. It was noted that whilst the Summer period may coincide with holidays, holding the consultation in Winter could also present barriers, such as poor weather conditions and shorter daylight hours, which might deter engagement.

In response to a Member query, the Chairman confirmed to the Board that the extraordinary meeting had fulfilled its purpose of reviewing the consultation process and as such the item would not return to the Overview and Scrutiny Board meeting scheduled for 18th November 2025.

RESOLVED that the Local Plan Consultation Methods report be noted.

51/25 **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.

The meeting closed at 7.12 p.m.

Chairman