

Strategic Planning – Bromsgrove District Council
Parkside
Market Street
Bromsgrove, Worcestershire
B61 8DA

by email only to: strategicplanning@bromsgroveandredditch.gov.uk

2 April 2021

Dear Sirs

**RE: CATSHILL AND NORTH MARLBROOK PARK NEIGHBOURHOOD PLAN
REPRESENTATIONS UNDER REGULATION 16**

Background

Further to your letter, dated 25th February 2021, I write on behalf of Worcestershire County Council (WCC) to submit representations to the Catshill and North Marlbrook Neighbourhood Plan Submission version January 2021 (NP).

WCC has previously made representations through Place Partnership (dated 2nd November 2021, ref: P/H Div/0029/20) in relation to two landholdings that form part of the WCC Bournheath Smallholdings Estate. A copy of the plans previously submitted, of the sites in question, are enclosed for ease of reference for illustrative/reference purposes only (not to scale).

As previously stated, according to BDC's April 2020 Housing Land Supply Report BDC can only demonstrate 3.18 years of housing land supply between 2020 – 2025. In addition to this, on 19th January 2021, the Government published the Housing Delivery Test: 2020 measurement (HDT) results. It is stressed that the HDT results have been already adjusted to take account of the impacts of Covid-19 on housing delivery in 2020. Despite this BDC are stated to have only delivered 69% of their housing (1,025 homes).

The district will also be expected to accommodate some of Birmingham's unmet housing as part of its share of the Greater Birmingham Housing Market Area. This is specifically acknowledged within the Adopted Bromsgrove District Plan 2011 – 2030 (2017) (ALP). As previously stated BDC cannot, as a local authority, deliver it required housing targets without release of Green Belt land due to in excess of 90% of the local authority area standing within Green Belt.

Within the ALP Catshill is acknowledged as a "Large Settlement" (population circa 2500 – 10,000) so is within the largest category of settlement second only to Main Town which, in this case, is Bromsgrove itself. It is very clear that within ALP Policy BDP2, which outlines the District's Settlement Hierarchy, that new development for Bromsgrove's needs should be located in accordance with said settlement hierarchy.

Furthermore, within ALP Policy BDP3, it is clear that a full Green Belt review will be carried out and further sites will be allocated within a Local Plan Review to contribute approximately 2,300 dwellings towards the 7,000 target.

The 2,300 figure is not an upper limit given that ALP Policy BD3 is specific that the amount of development required in relation to the conurbation is uncertain and will depend on evidence available in the next District Plan Review.

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The Green Belt Review, in ALP Policy BD4, states that it will take account of the need for the 2,300 dwellings stated, the need for identifying safeguarded land to meet longer term development needs in Bromsgrove and possibly in the conurbation stretching ten years beyond the plan period, the cross-boundary development needs in the plan period and identification of the most sustainable sites to meet needs identified.

Call for Sites and Green Belt Review

Sites within the Catshill and North Marlbrook NP, such as those within the WCC Bournheath Smallholdings Estate, are therefore *key* in addressing both the district's supply and delivery shortfalls. The sites have been submitted as part of the Bromsgrove District Council (BDC) Call for Sites as part of the preparation of the emerging Local Plan.

Both of the parcels of land in WCC's Bournheath Smallholdings Estate fall within strategic parcel reference C12 (South of Catshill, North of M42) which, within BDC's Green Belt Purposes Part One Assessment (Appendix 3). This, as previously stated, identified the areas where WCC's sites are located as having medium/high capacity for development. This was because in relation to the Stourbridge Road parcel, the parcel was deemed to have 'limited landscape value' in relation to the Greenbelt.

In relation to the WCC parcel at Rocky Lane, the study supported development there, given it is already screened from the M5 by existing boundary vegetation. It was also concluded that the parcel plays no role in restricting urban sprawl and there are already urbanising features within the parcel such as the Topaz Business Park and Willowbrook Garden Centres, which reduce the importance of the Greenbelt in this location.

Provision for sites/housing within the NP

AECOM had already noted that the Parish needs to be able to deliver 257 dwellings for the plan period and projecting this through to 2040 means an additional 230 houses would be required. It is noted that site five, in which WCC's land off Stourbridge Road is included, was considered by AECOM as suitable for housing subject to being released from the Green Belt.

The last response to the Call for Sites, undertaken in Autumn 2019, was marked with a very clear disclaimer that no assessment of the suitability of any sites has taken place and no conclusions should be drawn at this stage. As a result of this we are pleased to note that it is now specifically acknowledged within the NP that BDC has not yet completed its Green Belt review and that the absence of such a strategy currently means it is uncertain what housing targets will be proposed for different parts of the district and that it is not realistic to identify specific sites within the NP.

Instead the NP highlights Policy H1 that sets out an approach, based on the criteria developed in the site assessment studies, that would minimise the impact of further housing development in the Parish. It is proposed that that approach should be adopted when assessing future housing schemes. We find that NP Policy H1 is positive and proactive in essentially mirroring the approach within both the ALP, emerging Local Plan and the National Planning Policy Framework 2019.

It allows for the principle of major development (ten or more houses) on land which BDC has released from the Green Belt. We are supportive of this approach as it allows BDC to

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decide where Green Belt land would be best released in order to best distribute and locate housing across the district. It also acknowledges that the area within the NP will be required to accommodate housing during the plan period which is key given its role as a Large Settlement within the district.

Basic Conditions

The NP is required to meet the “basic conditions” set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

Based upon the approach which now seeks to allow BDP to decide what land is released from Green Belt, and thus allow development on such sites in principle within the NP, it is considered that the NP now has regard for national policy, contributes to the achievement of sustainable development and is in general conformity with the strategic policies contained in the development plan for the area of the authority.

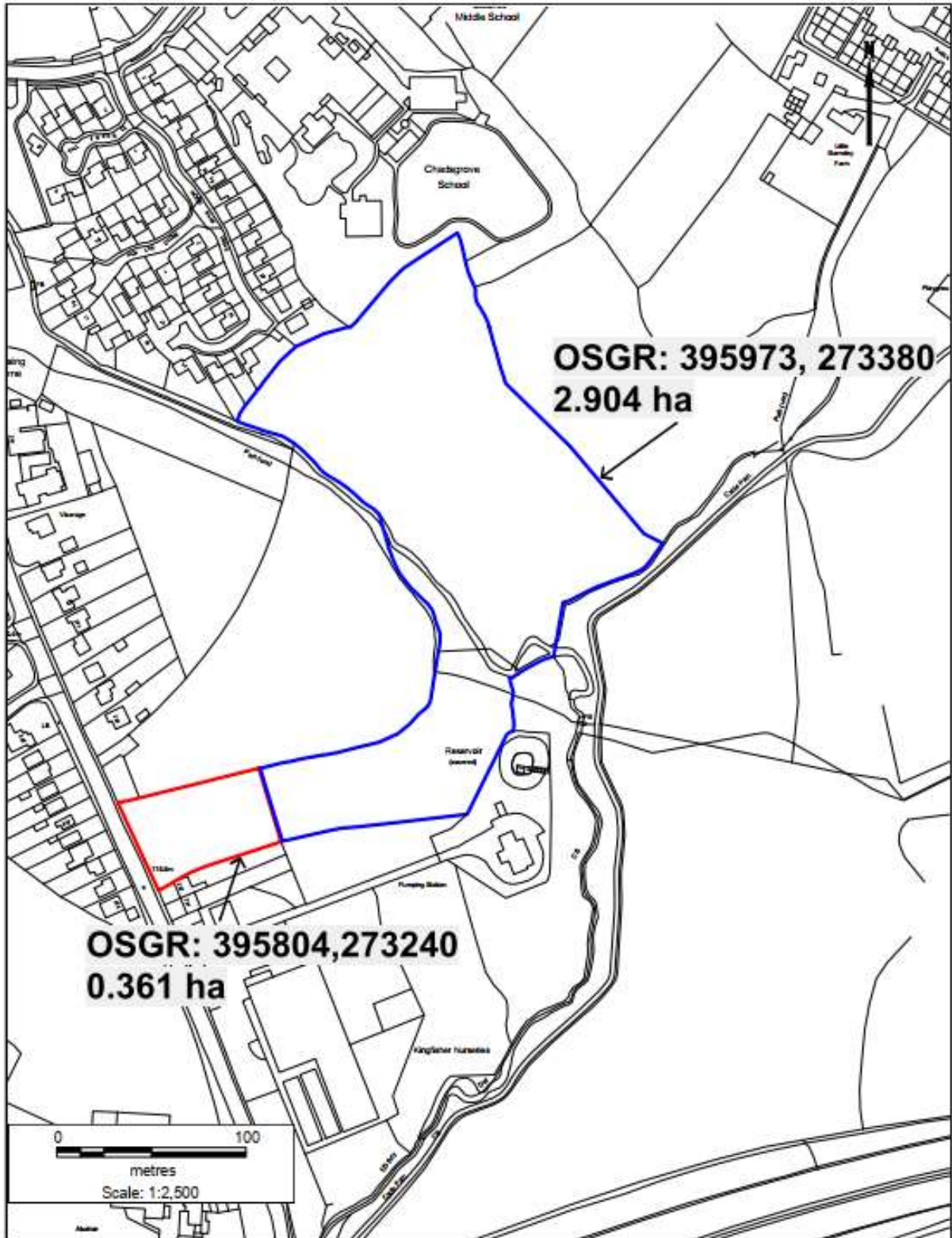
If you have any queries regarding the content of this response please do not hesitate to contact me.

Yours faithfully

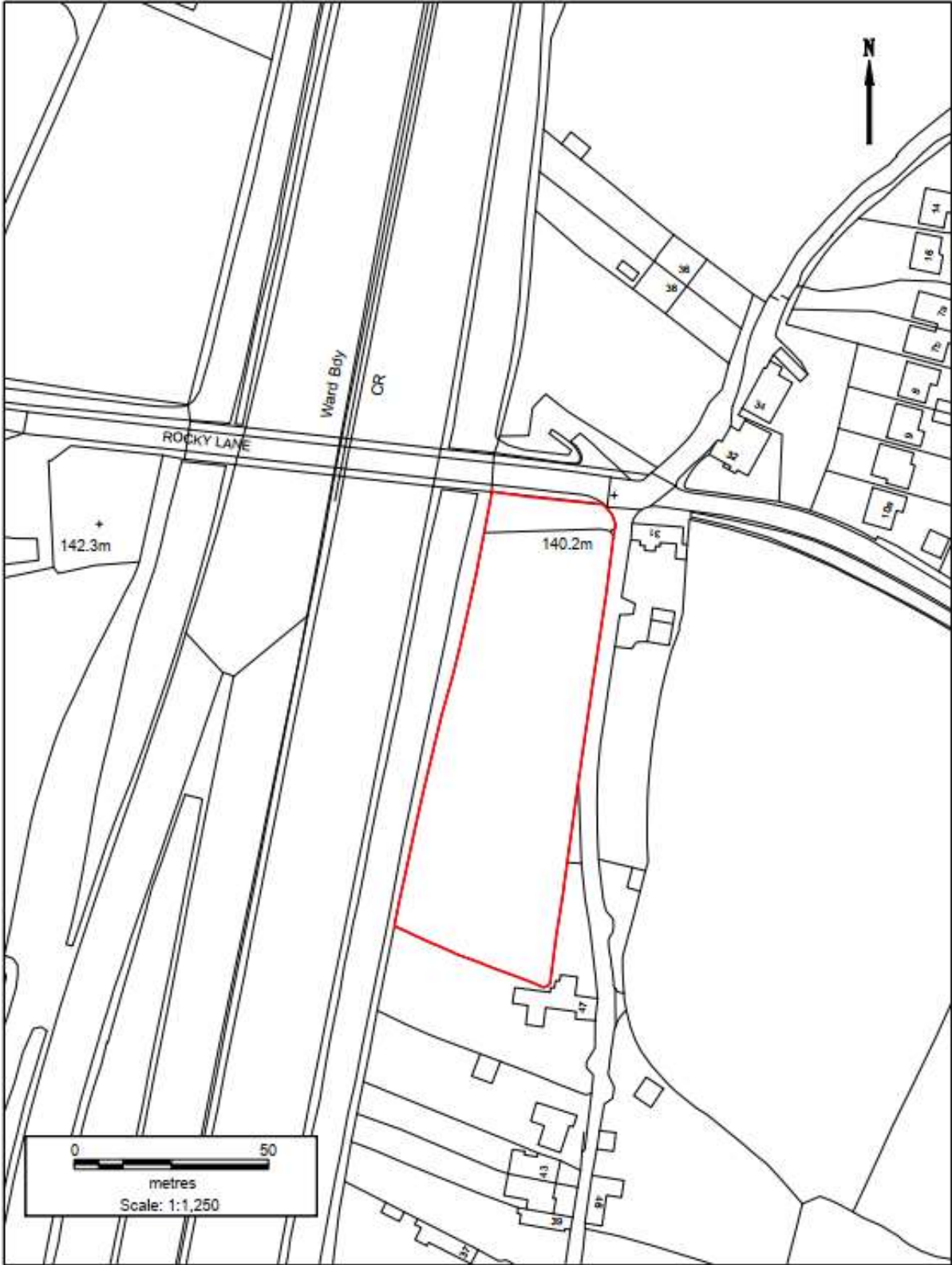


Eleni Randle FRICS FAAV MRTPI
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RICS Young Surveyor of the Year (Land) – Winner 2019
Eldnar Consultancy

Enc.



	Land off Stourbridge Road, Catshill	Place Partnership Placepro House Unit 5 Berkeley Business Park Wainwright Road Worcester WR4 9FA Date: 05/11/2019
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	Land at Rocky Lane Bournheath Bromsgrove B61 9HX	Place Partnership Placepro House Unit 6 Berkeley Business Park Wainwright Road Worcester WR4 9FA Date: 30/10/2020
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