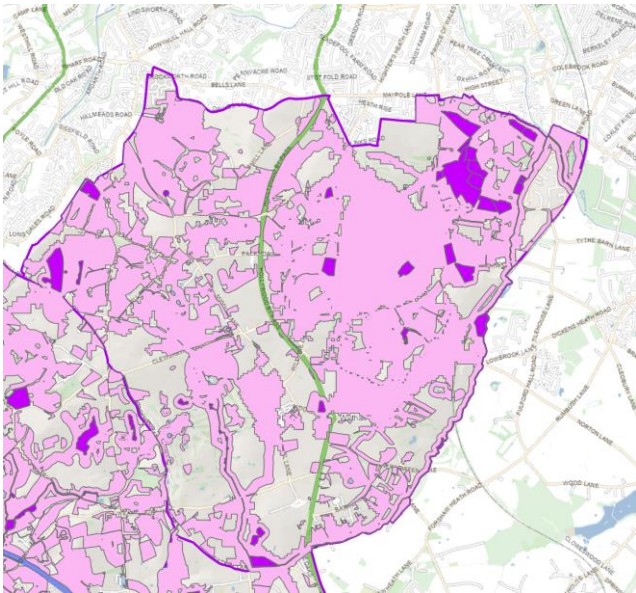


Wythall Parish Council comments on Regulation 16 Consultation Responses

Response/Comment	Wythall PC comment
1. Network Rail	
Support for provision of additional car parking, or financial contributions towards provision, to serve rail station where development creates additional use of the station.	This is welcomed.
2. and 3. Tomkins-Coll + Tomkins	
Needs for pedestrian crossing at corner of Hasluck's Green and Tilehouse Lane to provide access to Whitlock's End Station.	Not identified as an issue during the preparation of the plan. This can be progressed separately with a report to Highways to assess viability and suggested as an improvement for S106 contribution from a developer.
Canal Drawbridge at Major's Green (MG) should be a non-designated heritage asset.	It is. See site 10 of policy WYTHALL 6
The canal route should be mentioned in Section 1 as an important amenity for MG.	Not identified as such during the preparation of the plan. However, at the Examiner's discretion, reference can be inserted into the supporting text.
Frequent flooding of River Cole tributary should be mentioned.	Not identified as an issue during the preparation of the plan
NE Worcestershire Way should be mentioned as a major amenity for residents of MG.	Not identified as an issue during the preparation of the plan, although the NE Worcestershire Way is mentioned in Chapter 9.
Better access is needed at MG to the NE Worcestershire Way.	Not identified as an issue during the preparation of the plan. Whilst the NE Worcestershire Way cuts through the land at Brookhouse Farm, there is no public right of way down the access track to the farm, opposite Rolan Drive. Therefore there is no remit to provide this access.
Fields on the edge of MG should be designated as LGS.	Not identified as an issue during the preparation of the plan
No mention of landfill and bottle pit.	Noted. Not identified as an issue during the preparation of the plan.
MG becomes an island during floods – cut off.	Not identified as an issue during the preparation of the plan
No pavement from Peterbrook road to drawbridge.	Not identified as an issue during the preparation of the plan
6. Wells	
Plan document paragraph 96 and supporting document Audit of Community Facilities & Infrastructure include Site 74 – states no longer operating as a dental practice.	Can be removed. If there is no other provision, at the Examiner's discretion, supporting text can refer to that fact.
8. Bourneheath PC	
Further mention of education provision would be supported, to address requirements for additional provision.	Local plan policies address this matter. School rolls change over time.
11. Nexus for Lone Star Land	
Wythall 1 – include words to say that contributions should be "proportionate	The policy aims to secure benefits from development and has identified requirements where there is a sub-standard

and compliant with the statutory tests” set out in CIL regulations.	level of provision and ambitions where there is scope for improved provision. It is open to developers to voluntarily meet community needs in excess of the statutory list and tests, for example within scheme design or through unilateral undertakings. Already, the policy has flexibility to not meet requirements based on viability and other site-specific considerations.
Wythall 2 – says the policy should incorporate flexibility to ensure development remains viable and that wider planning objectives can be achieved.	At the time of writing the policy, the scale of BDC proposals for development in Wythall Parish were not published. In similar circumstances in other places, words have been inserted into NDP housing policies to make clear the distinction is acknowledged between the housing type/tenure required to meet local community needs and the broader provision that will meet wider needs of the district. The aim is to ensure that strategic allocations meet local need whilst also delivering to meet broader needs. It would be a negative if housing provision to meet the broader population needs missed meeting local needs.
Wythall 4 – says density expectations should be applied flexibly given desire for smaller homes/apartments which would be better located in accessible locations.	There is not an opposition to the efficient use of land and higher densities, but there is a clear objective to ensure that developments acknowledge the transition between existing lower density areas and new areas of development – there is a clear desire to avoid new development overbearing existing development. This can be addressed in the design of developments in the vicinity of existing residential areas.
12. Deloitte for the Church Commissioners for England	
1.5 Refers to the need for the NDP to be in general conformity with the current statutory development plan.	Refer to updated basic conditions published in March 2026. This has amended this requirement.
1.6 refers to new NPPF and transitional arrangements	Noted, it is not yet published and will not apply to the NDP as it has passed submission stage.
1.9 assert the NDP does not meet basic conditions	See below.
Un-numbered Para before 2.7 says NDP makes a “categorical rejection of any Green Belt release in Wythall” to pre-empt and potentially conflict the Local Plan Review – refers to para 105 and seeks amendments.	The NDP does not reject green belt release. It just does not propose it. There is no requirement for the NDP to do so. Green Belt policy is a strategic policy matter beyond the scope of the NDP. Until the local plan proposes green belt release and is examined to confirm these proposals, or applicants and the Local Planning Authority determine that some land is grey belt and can be developed under NPPF policy, the NDP has to consider that green belt rules apply. Decisions to release land from the Green Belt will involve considerations about Green Belt purposes in land parcels that may extend beyond the boundaries of the Neighbourhood Area. The NDP was prepared under a Basic Conditions requirement to conform with the adopted development plan and propose non-strategic policies as required by the NPPF.

	In this case, all land in the Parish outside settlement boundaries lies in the Green Belt. The setting of Green Belt boundaries is a strategic policy matter.
2.7 says NDP is focused on environmental protection and not economic and social pillars of sustainable development.	The NDP addresses transport, community facilities, heritage facilities as well as the environment. Key transport considerations relate to accessibility to stations and bus routes for employment, shopping and leisure purposes.
13 and 14. Harris Lamb for Taylor Wimpey (Silver Street) + Harris Lamb for Taylor Wimpey (Alcester Road)	
Refers to basic conditions general conformity with strategic policies of the development plan. Says cannot be in conformity.	The requirement has been for the NDP to be in conformity with the adopted development plan and it has been prepared on this basis. The emerging local plan review has not yet been submitted for examination. In March 2026, amended Basic Conditions were published to remove the requirement for NDPs to be in conformity with the adopted development plan. NDP policies and supporting information highlight the current use, value and roles of land in the Neighbourhood Area to the local community so that, if land is released from the Green Belt and development is proposed, then these matters can be considered in development design. This is not controversial and will not frustrate future development. If there is a requirement to update the NDP following adoption of the Local Plan, then the review process allows for this.
Says the NDP is premature because the green belt release proposals were not known.	There is no requirement in regulations for a NDP to allocate land for housing. In this case, the only available land would have Green Belt status and it would not be possible for the NDP to propose allocations on land in the Green Belt.
Says the NDP should allocate a green belt site promoted by Taylor Wimpey.	This is a matter for the Local Plan until such time as green belt boundaries are amended.
Says the NDP should not progress to Examination.	There is no case for delaying the NDP. The draft NDP is already providing clear benefits to the local community through the active dialogue that has resulted with proactive developers who have engaged with the Parish Council and to discuss how their proposals can help to meet the priorities identified.
15. Savills for Bellway (land South of Houndsfield Lane)	
Should refer to more recent publications issued by BDC since submission.	The Draft NDP was submitted to Bromsgrove District Council on 6th March 2025. Bromsgrove District Council undertook to Regulation 16 consultation between 11th February and 26th March 2026 (11 months later). The Examiner may wish to clarify with Bromsgrove DC why it chose not to publicise the plan proposal as soon as possible after receiving it, or at other points during the 11-month delay.

	WPC believes that the Draft NDP policies have been carefully drafted to take account of potential strategic policy outcomes and likely speculative development proposals. If the Examiner requires updates to reflect the emerging local plan policies (which are not yet submitted or tested), then this can be accommodated in supporting text without affecting proposed policies.
Wythall 2 – housing mix - seeks to amend part 2 to provide flexibility arguing that the words ‘should’ and ‘include a maximum’ remove flexibility.	The policy includes a caveat that the precise mix of affordable housing will be decided on a <u>site-by-site basis</u>. The policy requirement is for applications to <u>demonstrate</u> how they have <u>considered</u> housing affordability <u>factors</u>. These policy requirements are already flexible. The policy flexibility recognises there is no supporting viability work to underpin more rigid requirements. The use of terms objected to relates to the needs identified through the Housing Needs Assessment, but clearly within the framework set out, which is flexible.
Wythall 8 – seeks addition of statutory biodiversity credits from the government as a third option (which could be invested anywhere in England)	Amended Basic Conditions require NDPs to consider the potential for them to contribute to the delivery of Local Nature Recovery Strategies for their areas. Almost all of the strategic development within Wythall Parish is going to take place on what is currently greenfield agricultural land controlled by landowners who are releasing their land for development. Given the land resources available, the NDP considers it appropriate for BNG requirements to be met locally in this context. The NDP was submitted prior to publication of the Worcester LNRS. The Local Habitat Map since published shows areas of current and potential habitat importance. This is shown below. 

Policy Wythall 10 – Support for Rail Services and Station improvements - seeking recognition in policy or supporting text that parts (a) and (b) will not be in the control of applicants and will require network rail or other co-operation.	We are happy to accept or provide words that would reflect this point.
16. Worcestershire County Council (Historic Environment and PROW Team)	
Wants for the plan to make clear that inclusion on the NDHA list is not necessary for the application of wider heritage policy	This is not necessary. Nationally Listed Buildings and Scheduled Monuments are shown separately in the plan and the section on local heritage assets makes clear what their purpose and role is. Policy Wythall 6 refers only to the Non-Designated Heritage Assets.
Figure 20 and Table 9 – routes RC3, BC4 and LGW3 [sic] cycle routes would in part run over PROW on the definitive map. Would require landowner, PROW team and public consultation and a legal process in order to change status of these routes to accommodate cycling.	The policy requirement is ‘encouraged to support improvements to and well-marked signage for....’. This is not onerous. LGW3 is a walking route only. RC3 is a route which passes on highway and then through a proposed strategic allocation site (and forthcoming planning application). It is shown in the policy as a community priority for improved cycle route through what will be a masterplan site. This should provide a mechanism for identifying and promoting the necessary measures to address PROW constraints. BC4 is an on-road route from route OC1 (see table 9 of the plan)
17. Stantec for IM Land (land at Packhorse Lane)	
Says the Housing Needs Assessment is out of date	The HNA was published in October 2022 and as such it is not considered to be out of date.
2.1.4 expects the NDP to amend green belt boundaries (because of the lack of housing land supply) and 2.2.6 identify Grey Belt opportunities.	The NDP does not propose green belt release. There is no requirement for the NDP to do so. Green Belt policy is a strategic policy matter beyond the scope of the NDP. Until the local plan proposes green belt release and is examined to confirm these proposals, or applicants and the Local Planning Authority determine that some land is grey belt and can be developed under NPPF policy, the NDP has to consider that green belt rules apply. Decisions to release land from the Green Belt will involve considerations about Green Belt purposes in land parcels that may extend beyond the boundaries of the Neighbourhood Area.

	The NDP was prepared under a Basic Conditions requirement to conform with the adopted development plan and propose non-strategic policies as required by the NPPF. In this case, all land in the Parish outside settlement boundaries lies in the Green Belt. The setting of Green Belt boundaries is a strategic policy matter.
Wythall 2 – says the policy is too prescriptive and should not refer to specific tenure splits.	NPPF policy allows for Neighbourhood Plans to comment on and have policies for local housing needs to reflect local population requirements and affordability. A housing needs assessment was prepared to support the proposed policy and suitable flexibility has been built into it.
Wythall 3 – says that the policy should not prioritise a single dwelling type.	There is sufficient flexibility in the policy to provide support for proposals for all types of housing. The purpose of mentioning 2-bed open market properties potentially apartments, is to refer to an expressed local need discussed in the plan.
Wythall 4 – Says the design codes are onerous and do not provide sufficient flexibility.	The design codes are reproduced from a report produced by AECOM. These are similar in scope and detail to those produced for many neighbourhood plans. Table 5 shows the codes in the plan to support better appreciation of the AECOM guidance and of policy requirements for users of the plan.
Policy Wythall 5 – Environmental Performance of Buildings - Provide alternative wording to avoid reference to future homes standard and duplication of building regulations.	We are content to accept the Examiner's recommendation.
Wythall 6 – says the NDHA sites do not identify the features that are important and need protecting.	Appendix A provides information in support of the proposed designations.
Wythall 8 - seeks addition of statutory biodiversity credits from the government as a third option (which could be invested anywhere in England).	Amended Basic Conditions require NDPs to consider the potential for them to contribute to the delivery of Local Nature Recovery Strategies for their areas. Almost all of the strategic development within Wythall Parish is going to take place on what is currently greenfield agricultural land controlled by landowners who are releasing their land for development. Given the land resources available, the NDP considers it appropriate for BNG requirements to be met locally in this context. The NDP was submitted prior to publication of the Worcester LNRS. The Local Habitat Map since published shows areas of current and potential habitat importance.
Policy Wythall 9 - Support for Bus Services – says the measure is not viability tested and therefore all the measures should be removed.	Suitable wording inserted to ensure flexibility would be acceptable, if required.
18. Lichfields for St Philips Land (<i>Land at Hollywood Golf Course</i>)	
Says the NDP should incorporate more recent information to demonstrate the	The Draft NDP was submitted to Bromsgrove District Council on 6th March 2025 . Bromsgrove District Council

level of housing requirement in the plan area.	undertook to Regulation 16 consultation between 11th February and 26th March 2026 (11 months later). Bromsgrove DC published proposals for strategic green belt land release after submission of the NDP.
Says the NDP should have allocated land to meet housing needs in proportion to the district population and the percentage of it in Wythall (13%) (which they assert would mean the NDP planning for 1,580 dwellings to 2040). Argues that the NDP should identify land for green belt release and that it should conduct a grey belt assessment of its own and through this process, identify the golf course as a grey belt site.	Local parish housing requirements within the Bromsgrove local plan review area are not set on a pro rata basis, but in accordance with the emerging spatial strategy for the area supported by sustainability appraisal. The NDP does not propose green belt release. There is no requirement for the NDP to do so. Green Belt policy is a strategic policy matter beyond the scope of the NDP. Until the local plan proposes green belt release and is examined to confirm these proposals, or applicants and the Local Planning Authority determine that some land is grey belt and can be developed under NPPF policy, the NDP has to consider that green belt rules apply. Decisions to release land from the Green Belt will involve considerations about Green Belt purposes in land parcels that may extend beyond the boundaries of the Neighbourhood Area. The NDP was prepared under a Basic Conditions requirement to conform with the adopted development plan and propose non-strategic policies as required by the NPPF. In this case, all land in the Parish outside settlement boundaries lies in the Green Belt The setting of Green Belt boundaries is a strategic policy matter.
Wythall 1 – argues that the policy is too restrictive, that there is provision elsewhere and that private golf courses should not be included anyway.	The policy approach to the protection and provision of community facilities is fairly standard and present in most NDPs. The issue at stake is therefore not the policy but whether the golf course is a community facility. In many NDPs, golf courses are shown to be community facilities. WPC view the golf course as an important community resource, many other types of which are also private and paid for. It is also an essential element of leisure provision locally. It will be for Bromsgrove Local Plan Review to consider whether the site is suitable for allocation for development. If a planning application is submitted for development of the golf course, then it will be for the applicant to support their proposals with relevant submissions to address the need for the facility and other relevant policy matters.
19. NHS Herefordshire and Worcestershire ICB	
Supporting Document Audit of Community Facilities & Infrastructure -	Noted. If introducing a critical infrastructure category, then this might lead to other elements of local community

want primary and community healthcare to be shown as critical infrastructure and not general community facilities.	infrastructure being placed within it. This can be accommodated within the audit of community infrastructure as required, subject to the Examiner's views.
Policy Wythall 1 Local Community Facilities - NDP policy should require early engagement with NHS/ICB where additional demand will be generated from development.	It's not really the role of the NDP to set this out, but happy to include it if the Examiner agrees.
Policy Wythall 1 - Local Community Facilities - want requirement for proposals to demonstrate that capacity is sufficient or that mitigations/investment will be provided.	Again, this might be addressed in local plan policy so happy to include a requirement if not duplicating other policy requirements.
20 and 21 - Persimmon Homes for EAW Taylor Will Trust + Persimmon Homes South Midlands/S. Wiltshire	
1.2, 1.3 and 2.4 - Wants the NDP to include housing site allocations	The NDP does not propose green belt release. There is no requirement for the NDP to do so. Green Belt policy is a strategic policy matter beyond the scope of the NDP. Until the local plan proposes green belt release and is examined to confirm these proposals, or applicants and the Local Planning Authority determine that some land is grey belt and can be developed under NPPF policy, the NDP has to consider that green belt rules apply. Decisions to release land from the Green Belt will involve considerations about Green Belt purposes in land parcels that may extend beyond the boundaries of the Neighbourhood Area. The NDP was prepared under a Basic Conditions requirement to conform with the adopted development plan and propose non-strategic policies as required by the NPPF. In this case, all land in the Parish outside settlement boundaries lies in the Green Belt The setting of Green Belt boundaries is a strategic policy matter.
Wythall 2 – include the words “unless viability or site-specific circumstances indicate otherwise”	The policy includes a caveat that the precise mix of affordable housing will be decided on a <u>site-by-site basis</u>. The policy requirement is for applications to <u>demonstrate</u> how they have <u>considered</u> housing affordability factors. These policy requirements are already flexible. The policy flexibility recognises there is no supporting viability work to underpin more rigid requirements.
Wythall 4 – refine wording to avoid subjectivity. Avoid overly restrictive requirements in relation to density.	The design codes are reproduced from a report produced by AECOM. These are similar in scope and detail to those produced for many neighbourhood plans. Table 5 shows the codes in the plan to support better appreciation of the AECOM guidance and of policy requirements for users of the plan.

	In terms of densities, there is not an opposition to the efficient use of land and higher densities, but there is a clear objective to ensure that developments acknowledge the transition between existing lower density areas and new areas of development – there is a clear desire to avoid new development overbearing existing development. This can be addressed in the design of developments in the vicinity of existing residential areas.
Policy Wythall 5 – Environmental Performance of Buildings - want to change the policy to avoid reference to standards/duplication with building regulations.	We are content to accept the Examiner's recommendation.
Wythall 1 – want reference to CIL regulation tests - necessary, directly related and fairly and reasonably related in scale and kind.	The policy aims to secure benefits from development and has identified requirements where there is a sub-standard level of provision and ambitions where there is scope for improved provision. It is open to developers to voluntarily meet community needs in excess of the statutory list and tests, for example within scheme design or through unilateral undertakings. Already, the policy has flexibility to not meet requirements based on viability and other site-specific considerations.
Policies Wythall 9 - Support for Bus Services, Wythall 10 - Support for Rail Services and Station improvements & Wythall 11 - Support for improvements to priority walking and cycling routes should include flexibility linked to the scale of development, viability and deliverability.	Happy to propose or accept wording to reflect this.
22. Harris Lamb for Barratt Redrow, the Church Commissioners for England, Bloor Homes and Birmingham Property Group Holdings	
The NP fails to recognise that the local plan requires additional housing allocations in the green belt – fails basic conditions.	The NDP does not propose green belt release. There is no requirement for the NDP to do so. Green Belt policy is a strategic policy matter beyond the scope of the NDP. Until the local plan proposes green belt release and is examined to confirm these proposals, or applicants and the Local Planning Authority determine that some land is grey belt and can be developed under NPPF policy, the NDP has to consider that green belt rules apply. Decisions to release land from the Green Belt will involve considerations about Green Belt purposes in land parcels that may extend beyond the boundaries of the Neighbourhood Area. The NDP was prepared under a Basic Conditions requirement to conform with the adopted development plan and propose non-strategic policies as required by the NPPF.

	In this case, all land in the Parish outside settlement boundaries lies in the Green Belt. The setting of Green Belt boundaries is a strategic policy matter.
Does not reflect the significant development coming to Wythall through the emerging local plan.	The Draft NDP was submitted to Bromsgrove District Council on 6th March 2025. Bromsgrove District Council undertook to Regulation 16 consultation between 11th February and 26th March 2026 (11 months later). WPC believes that the Draft NDP policies have been carefully drafted to take account of potential strategic policy outcomes and likely speculative development proposals. If the Examiner requires updates to reflect the emerging local plan policies (which are not yet submitted or tested), then this can be accommodated in supporting text without affecting proposed policies.