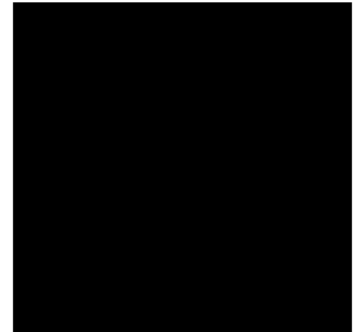


26 March 2026



Strategic Planning
Bromsgrove District Council
Parkside Market Street
Bromsgrove
Worcestershire
B61 8D

Sent via email to:
strategicplanning@bromsgroveandredditch.gov.uk



Dear Sir/Madam,

**Response to Wythall Neighbourhood Plan – Regulation 16 Consultation
Bellway Strategic Land, part of Bellway Homes Limited**

On behalf of my client, Bellway Strategic Land, part of Bellway Homes Limited (hereafter referred to as 'Bellway'), I am writing to you to respond to the Wythall Neighbourhood Plan ('NP') Regulation 16 Consultation.

Bellway is promoting land South of Houndsfield Lane (circa 45.04 hectares (111.28 acres)) for residential development (hereafter referred to as 'the Site'). A Site red line plan is attached at Appendix 1

The following is also proposed for the Site, which includes extensive community benefits (see benefits plan attached at Appendix 2):

- **50% affordable housing**, supporting local people to access quality homes.
- Land safeguarded for a 1FE **primary school**.
- A **Local Centre** for potential community, retail and leisure uses.
- A **Mobility Hub** with 50 parking spaces, cycle parking, and sustainable transport links serving Wythall and Whitlocks End train stations.
- Children's and youth **play areas and open amenity spaces**.
- Enhanced and extensive additional **pedestrian and cycle connections** across the site and to neighbouring areas.
- Extensive **public open space**, including green corridors, nature trails, habitat areas and accessible walking routes.
- **Biodiversity improvements** including strengthening hedgerows, new tree planting and habitat creation along the brook.
- **Sustainable drainage systems** (ponds, swales and wetland meadows) incorporated into green corridors to manage water and help address existing flooding issues on **Lea Green Lane**.

This Site was included as a potential allocation in the Draft Development Strategy (June 2025) Bromsgrove consulted on last year (WY01) for 875 new homes. However, following consultation with local residents, the Parish Council and a detailed review of site constraints, the proposed capacity for the residential development at this site is now considered to be less than 875 dwellings

An application is currently being prepared for submission to Bromsgrove District Council in the coming weeks. To support this a range of technical work has been prepared to assess the impact and any future development on the local highways network, ecology, drainage, flood risk and drainage and minerals. A public consultation on the proposals took place from 16 November to 7 December 2025, providing a three week consultation period. Two in person consultation events were held on 24 November (Wythall Village Hall 3pm-5:30pm, Woodrush High School 6-8pm). The events were deliberately arranged as separate sessions at different times



of day, incorporating an afternoon event and an evening event in separate locations, to maximise accessibility for residents across Wythall and Drakes Cross. There was some very useful feedback received from residents and members of the Parish Council which has informed the planning application that we will be submitting shortly.

Savills on behalf of Bellway responded to the Regulation 14 version of the Plan in December 2024. Some positive amendments have been made, following our comments, which are acknowledged below. However, we have some additional comments and would like to reiterate some of the same points outlined previously.

Consultation Response

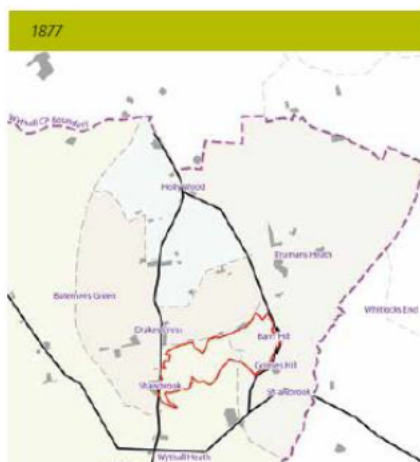
Below we set out our detailed comments.

Chapter 1 Introduction to Wythall Parish

Bellway previously objected to the reference of Wythall as “being rural in character” [Savills Emphasis] at paragraph 3 of the Regulation 14 consultation document. This wording has subsequently been amended to “Wythall has a rural heritage” [Savills Emphasis] which is supported. As set out in the representations submitted to the Regulation 14 consultation, Wythall should not be labelled as ‘rural’. The Bromsgrove Adopted Plan (2017) at 2.4 Table 2. District’s Settlement Hierarchy categorises Wythall (including Drakes Cross, Grimes Hill and Hollywood) as a ‘larger settlement’, the second most sustainable settlement in Bromsgrove. This demonstrates that the Council do not regard it as a ‘rural’ location. This is confirmed by the Settlement Hierarchy Review June 2025 which classifies Wythall as a ‘large settlement’ (including Drakes Cross, Grimes Hill and Hollywood). In the scoring Wythall ranks the 4th most sustainable settlement in BDC.

The plans provided below demonstrate Wythall’s spatial evolution. These maps reveal a historic pattern of expansion and urban consolidation the area due to the good transport links and represents sustainable growth within a self-sufficient urban area. Bellway’s Site proposes to continue the historic trend of urban consolidation in recognition of the sustainable transport links and services available, whilst maintaining strong green infrastructure framework, which crucially, provides an alternative to outwards expansion into the wider countryside and further coalescence with Birmingham. In essence, it is considered that a balance between the environment, social and economic offering can be achieved through Bellway’s proposals.

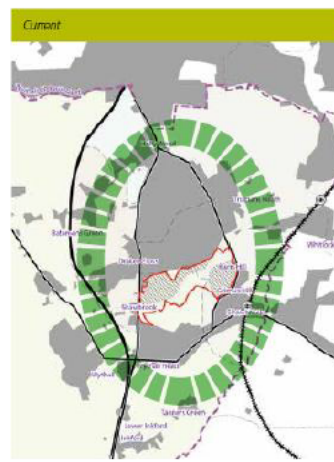
Bellway Site Promotion – Development Principles Document (May 2017) (Extract – Pages 10-11)



The area is distinctly agricultural, with a uniform scattering of small fragmented village and hamlet settlements, mostly comprising farmhouses and associated buildings.



The local farmsteads are now beginning to form small settlements. Further ribbon development is occurring along the main roads and clustering around nodes. Growth around Shawbrook and Whitlocks End is spurred on by the opening of the railway.



Most of the original, smaller settlements have coalesced to create large contiguous settlements. Wythall is now a settlement of two halves with a narrow gap between Hollywood to the north and Grimes Hill to the south - whilst effectively functioning as a single place - as confirmed by the settlement hierarchy within the Local Plan. The green oval above shows the effectiveness of the Green Belt function in terms of restricting outwards development conjoining with Birmingham, and eroding the surrounding countryside.

Paragraph 18 of the consultation document has been updated from the Regulation 14 version to explicitly refer to Bromsgrove District Council’s 2019 Green Belt Purposes Review rather than stating ‘the recent’ Green Belt review. It states that this “review indicated that the Green Belt of Wythall Parish plays an important role in preventing sprawl beyond the current edge of Birmingham”. Paragraph 18 of the consultation document goes on to state that “as of January 2025, Bromsgrove District Council has not published further technical work or policy proposals regarding the future status of Green Belt in Wythall”.

The National Planning Policy Framework (‘NPPF’) at paragraph 32 requires ‘the preparation and review of all policies should be underpinned by relevant and up to date evidence’. The evidence the draft Plan is based on in relation to the Green Belt is from 2019 and therefore is considered to be outdated, as such the draft Plan does not conform with basic condition a) of the Planning Practice Guidance (PPG)¹ which states that the draft neighbourhood plan should ‘have regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan)’. Bromsgrove have also published their Green Belt Study (Part 2) (dated 2022) and therefore Bellway consider that this should be referred to.

Table 1 – Achievement of Sustainable Development Objectives

Table 1 in the draft Plan demonstrates how each of the policies within the plan contribute to the achievement of one or more of the overarching objectives, Bellway consider that their Site can assist the Parish in achieving a large proportion of these objectives, this is demonstrated below and was also set out in the Regulation 14 consultation response. Please note the below is not exhaustive.

Neighbourhood Policy	Plan	Objective	Savills Response
Economic Objectives			
WYTHALL 1 – Local Community and Facilities		<i>‘Ensuring a good network of community facilities and assets supports a well-balanced community which is an economic advantage. Would support the retention of services in Wythall Parish’</i>	The critical mass of the proposed development would support the retention of any existing services and facilities in the parish by bringing new customers.
WYTHALL Affordable Tenure	2 – Housing	<i>‘Supports the availability of homes affordable to the local working population on average incomes’</i>	The development will provide up to circa 680 dwellings. In accordance with NPPF paragraph 157, 50% of dwellings will be affordable. This will support the availability of homes affordable to the local working population on average incomes.
WYTHALL 3 – Housing Types and Sizes in Wythall		<i>‘Local policies which support a range of housing to meet identified local needs will help the economy of the area to function better’</i>	The proposed development would provide a range of types and sizes of homes in accordance with the identified local need at the Reserved Matters Application stage.
Social Objectives			
WYTHALL Affordable Tenure	2 – Housing	<i>‘Supports the retention of a balanced community and overconcentration of the elderly, based on affordable housing provision’</i>	The proposed development would provide a mix of dwellings, including affordable in line with the adopted policy requirements to allow for a more varied and younger population.
WYTHALL Environmental Performance Buildings	5 – of	<i>‘More energy efficient buildings will support local people to manage energy costs more effectively’</i>	Bellway’s development will be built in accordance with energy efficiency standards, as explained below 99% of new Bellway homes hold an EPC

¹ PPG Paragraph: 065 Reference ID: 41-065-20140306

		(energy performance certificate) rating of B or above.
WYTHALL 8 – Biodiversity Gauns for new development in Wythall Parish	<i>‘Greater local biodiversity encourages local people to appreciate and connect with nature and to foster well-being’</i>	The proposed development will provide a minimum of 10% Biodiversity Net Gain in line with national requirements (provided on and offsite). The local greenspace ‘Harmony Wood’ also provides an important local resource and means of connection between Wythall and Hollywood. It would form the centrepiece of a new network of open space providing for informal leisure and play, integrating the river corridor and meadows and enhanced pedestrian and cycle connections.
Environmental Objectives:		
WYTHALL 2 – Affordable Housing Tenure	<i>‘A supply of homes affordable to people who work in the area should contribute to objectives which seek to reduce the need to travel by car’</i>	As stated above, the proposed development would provide affordable housing in accordance with the adopted policy. The Wythall Site is located in close proximity to a range of shops, services and facilities as well as Wythall Train Station which would reduce the need to travel by car.
WYTHALL 3 – Housing Types and Sizes in Wythall	<i>‘Local housing provision to meet local needs will reduce the need for people to move away and travel back to work in the area by car’</i>	The proposed development would provide up to approximately 680 dwellings and the mix provided would be based on evidence available at the time.
WYTHALL 4 – Good Design and Development Form in Wythall Parish	<i>‘Will make a contribution to net zero carbon objectives’</i>	It is considered that new development is the only cost efficient way of achieving this objective and this provides strong justification for modern/new homes. 99% of new Bellway house hold an EPC (energy performance certificate) rating of B or above for energy efficiency. For comparison, 5% of second-hand homes hold the same rating ² .
WYTHALL 9 – Support for Bus Services	<i>‘Greater use of bus services helps to reduce carbon emissions from private cars’</i>	The new development will result in more residents which will subsequently create more demand for bus services, and will be promoted via the Travel Plan.
WYTHALL 10 – Support for Rail Services and Station Improvements WYTHALL 11 – Support for improvements to	<i>‘Greater use of train services helps to reduce carbon emissions from private cars’ and ‘Greater active travel reduces carbon emission from all forms of transport and encourages healthy living’.</i>	Wythall Train station is within 1km and walking distance of all of the Site. The proposed development is also proposing to provide a transport hub for Wythall Train Station including circa 50 car parking spaces, EV charging, E-

² <https://www.bellway.co.uk/about-bellway/energy-efficient-homes>

priority walking and cycling routes		scooters/bike provision and cycle parking.
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3. Our Vision and Development Objectives

Bellway supports many of the statements made on page 17 of the consultation document which demonstrate that Wythall is exceptionally sustainable and a good location for further residential developments such as the Site Bellway is promoting at Lea Green Lane. Paragraph 67 states *“the parish of Wythall occupies a strategic position to the south of the West Midlands Conurbation at the north-eastern end of Bromsgrove District. It borders the City of Birmingham and the Metropolitan Borough of Solihull”* [Savills Emphasis]. Paragraph 68 also acknowledges that the parish serves wider urban areas as well as its own needs and paragraph 70 notes the benefits of Wythall railway station meaning the settlement is accessible for commuters into Birmingham.

Figure 3 – Strengths, Weaknesses, Opportunities and Threats for Wythall Parish

As set out in our response to the Regulation 14 document, Figure 4 identifies ‘Green Belt’ and a ‘Train Station’ as strengths of the Parish. As advised in the Regulation 14 response, Bellway also consider that the key strengths of Wythall Parish include its proximity to Birmingham and Solihull and its good access to the M42 and A435. The list of strengths is not considered to be comprehensive and should include access to services, schools and transport links. These should be added.

Weaknesses identified in Figure 4 include: *“Lack of Planning with Solihull, Access to local shopping opportunities for pedestrians are limited, bus services are limited, train services are limited and cycling networks are poor”*. It is considered that many of these weaknesses could be mitigated by the new development. For instance, Bellway’s proposed development would create a critical mass of people which would generate a demand for new services and also increased use of the existing offers. Bellway’s proposals also include provision for a new Local Centre and Mobility Hub.

As set out previously, Bellway also consider that the identified opportunities in Figure 3 (page 18) can also be achieved by new development. The opportunities identified include:

- *‘Currently there is no parking provided at Wythall Rail Station’.*

Savills Response: The proposed development at Lea Green Lane would provide an opportunity to achieve this to address the lack of station parking at present. As mentioned, the Bellway Site is proposing to provide a 50 space car park and mobility hub for Wythall Train Station.

- *‘Strengthen green corridors and ecology’.*

Savills Response: As explained in our response to Wythall 7- Local Green Space Sites, the proposed development at Lea Green Lane will assist in enhancing the richness of the wildlife by providing biodiversity enhancements. Bellway is committed to achieving at least 10% Biodiversity Net Gain (using a mixture of onsite and offsite provision) and their development will seek to enhance the existing woodland corridors and create further benefits to local wildlife and the public alike.

- *‘New development could provide affordable housing for young people’.*

Savills Response: The proposed development will provide 50% affordable housing in accordance with NPPF paragraph 67 (b) and 157 and the golden rules.

- *‘Better design of new development’*

- **Savills Response: the proposed development will be design and landscape led. However, the detailed design will be firmed up at the Reserved Matters application stage.**

Figure 3 also identifies 'threats' identified, one states that *'Community infrastructure and bus services will come under increased pressure from new development'*. This is noted, however new development would also contribute to and provide new community infrastructure to support additional development pressures.

Vision (Paragraph 78)

The Neighbourhood Plan's vision states that *'New development will be well accommodated based on good design principles and local people will have a choice of housing to meet their needs'* which is supported. As a whole, the vision is considered to be written positively, in accordance with paragraph 15 of the NPPF which states that *'succinct and up-to-date plans should provide a positive vision for the future of each area'* and therefore is in accordance with basic condition a)³.

Objectives (Paragraph 79)

Bellway support the objectives identified for the Neighbourhood Plan and consider that they support new development being delivered. Ultimately, new development is the only way to improve travel, deliver a green infrastructure network, provide affordable housing and enhance community facilities.

Chapter 4 Community Infrastructure, Assets and Services and Table 3 – Community Aspirations and Priorities

Table 3 sets out community aspirations and priorities. As stated in our Regulation 14 response, 15 community aspirations are listed. A number of these aspirations require provision or contributions through new development. Some of the aspirations are substantial such as *'bigger village hall site potentially incorporating community kitchen and adult learning centre [and], additional local shopping area including post office (dependant on level of development)'* and Bellway consider the only way these can be delivered is through new development coming forward and could be delivered within the Local Centre proposed by Bellway.

Wythall 1 – Local Community Facilities

As set out in the representations submitted to the Regulation 14 consultation, Bellway support policy Wythall 1. The policy states *'where appropriate, proposals for new development should identify and propose contributions to meet investment priorities outlined in the Audit of Community Facilities and Infrastructure in Wythall Parish Supporting Document for important community infrastructure within Wythall Parish'* [Savills Emphasis]. The proposed development is currently seeking to provide parking provision at Wythall Station for approximately 50 car parking spaces on Site which is listed as a priority. It is also noted that a *"replacement for a larger Meadow Green Primary School"* is listed as a priority. Bellway's development proposals include land for a 1FE primary school.

The other investment priorities will be considered by Bellway and there may be an opportunity for the development to provide contributions for a number of the priorities listed if deemed appropriate and CIL 122 Compliant. They also need to be in accordance with NPPF paragraph 58 which states planning obligations must only be sought if certain tests are met. The Policy is however worded positively and is therefore in accordance with paragraph 16 of the NPPF and in line with condition a)⁴ of the PPG.

5. Housing Requirements

Paragraph 99 of the consultation document is supported. It states: *"the updated National Planning Policy Framework and increased Local Housing Requirements applying to Bromsgrove District which will increase the likelihood of Green Belt land releases within the district to facilitate development, or development*

³ PPG Paragraph: 065 Reference ID: 41-065-20140306

⁴ PPG Paragraph: 065 Reference ID: 41-065-20140306

on Green Belt land through speculative development proposals, including Wythall Parish” [Savills Emphasis]. The acknowledgement that Green Belt release is inevitable is welcomed. The current standard method is 715 dwellings per annum for Bromsgrove, this has increased by over 80% from 386 dwellings per annum. In light of this, Green Belt release in sustainable locations such as Wythall is important and inevitable and this should be acknowledged in the draft Plan, with support to accommodate an element of this growth required.

Furthermore, Bellway’s landscape consultant, the Environmental Dimension Partnership Ltd (‘EDP’) have produced a Green Belt Appraisal (July 2025) for the Site. See Appendix 3) based on the (updated NPPF, including its provisions for ‘grey belt’ land. The Appraisal concludes the following:

- The Site is physically and visually well contained, with mature hedgerow trees, topography, and adjacent development reducing its contribution to Green Belt openness;
- The Site makes a limited contribution to the five purposes of Green Belt, with no role in preventing urban sprawl, the merging of towns, or protecting a historic setting. As such, the site is considered to meet the criteria for grey belt, and its release would not fundamentally undermine the purposes of the wider Green Belt; and
- The Site offers an opportunity to deliver sustainable residential development with the provision of new, or improvements to existing, green spaces that are accessible to the public, aligning with the NPPF’s ‘golden rules’.

The appraisal states that the Site is suitable for release from the Green Belt and allocation for residential development, in respect of landscape and visual matters, as part of Bromsgrove’s strategy to meet identified housing needs in full.

Wythall 2 – Affordable Housing Tenure

It is acknowledged that the wording of the policy has been amended from the Regulation 14 version of the document to include “*on a site by site basis*”, which is welcomed. Paragraph 1 of the policy states: “*Whilst the precise mix of affordable housing will be decided on a site-by-site basis, applications should demonstrate how proposals have considered the following housing affordability factors in Wythall Parish*” [Savills Emphasis].

The addition of the word “*around*” in part 1) is also welcomed. However, it is considered that part 2) has limited flexibility and Bellway object to this. Part 2 states: “*Affordable home ownership should form around 30% of affordable housing provision in Wythall Parish, including a maximum 5% provision of Shared Ownership dwellings*” [Savills Emphasis]. As written the policy does not suggest that the mix is indicative and does not provide any flexibility. Paragraph 125 of the Housing Needs Assessment (October 2022) (HNA), acknowledges that when developing Neighbourhood Plan policies on tenure splits adding caveats to the policy can be beneficial such as “*the precise mix of affordable housing will be considered on the basis of site-by-site circumstances in addition to this evidence*”.

We consider that Policy Wythall 2 should be amended to reflect the HNA’s acknowledgement that housing mix should be determined on a site by site basis and on market signals that prevail at the time of an application or development coming forward (NPPF paragraphs 32 and 62). Without this flexibility, we do not consider that the Neighbourhood Plan meets basic condition (d)⁵ (contributing to the achievement of sustainable development).

Wythall 3 – Housing Types and Sizes in Wythall

Bellway notes Policy Wythall 3 and its amendments from the Regulation 14 version of the plan. Additional wording has been added which is welcomed (underlined text). The policy states: “*New housing provision in Wythall should meet a range of housing needs which assists in maintaining a balanced community within Wythall Parish. This requires housing of all sizes and different sites might meet specific local housing needs or a broad range of local and strategic housing needs with each considered on their merits*” [Savills Emphasis]. This amendment ensures that this specific policy is in line with paragraph 16 b) of the NPPF which states ‘*plans*

⁵ PPG Paragraph: 065 Reference ID: 41-065-20140306

should be prepared positively, in a way that is aspirational but deliverable' and also in accordance with basic conditions a) and d) in the PPG⁶.

6. Design and Development Form

Wythall 4 – Good Design and Development Form in Wythall Parish

In the Regulation 14 response Bellway's masterplanner McBains reviewed this and provided the following comments which are still relevant as only minor amendments have been made:

(Table 4) Design Principles for Wythall Parish Character Areas

Bellway would consider carefully the character responses in the 'Hollywood / Bovis Estate / Wythall Village' principles as proposals evolve, to ensure these areas are responded to and respected.

(Table 5) the Design guidance Codes for New development in Wythall Parish

A-Built Character Features

- Bellway could help deliver 'built character features' of high quality, ensuring that the much needed new homes become true places where people will want to live, and both draw from and complement the existing neighbourhood character areas.
- These would include attractive and robust architectural detailing that will stand the test of time, including local references as mentioned.
- A subtle and muted colour palate would be employed, alongside high quality boundary treatments, ensuring homes and landscape ages well and improves over time.

D-Green Infrastructure

- The provision and enhancement of green infrastructure will be key in delivering a 'landscape led' proposal, from habitat areas, to play areas and open greenspaces.
- Tree lined streets with planted verge areas would form key components of primary streets and shared lanes within the proposals.

E-Sustainable design and climate resilience

- New homes and infrastructure would be sensitively and resiliently designed, to substantially reduce energy demand and promote wellbeing. Storm water attenuation would be carefully integrated into the scheme as attractive and usable spaces.

I-Car Parking

- The scheme would consider the careful design for the parked car, the principles outlined provide clear advice and seek to mitigate the impact of vehicles on the street scene. It may be important to allow more than 2 dwellings in a row with 'frontage parking' to allow for efficient use of land with smaller home types and possibly in more intimate mews type street environments, but this could still be limited and from experience can work very well if strict rules on the quantum of high quality landscape (between say every four bays) matches the width of a parking space, giving space for a tree or shrub planting to root effectively.

⁶ PPG Paragraph: 065 Reference ID: 41-065-20140306

L-Green Verges

- As noted above (I-Car Parking), proposals will be landscape led and streets will include green verges providing space for street trees, creating an element of woodland cover within streets scenes providing wellbeing and shade benefits to mitigate climate extremes.

Wythall 5 – Environmental Performance of Buildings

Bellway note policy Wythall 5 as written. The policy states *'new development design in Wythall Parish should be future-proofed to support the achievement of the Future Homes Standard'* [Savills Emphasis]. As stated in the response to the Regulation 14 consultation, Bellway is committed to providing low-carbon homes built with the future in mind. In January 2023 Bellway launched a dedicated testing facility, 'The Future Home' which is located within the Energy House 2.0 research facility at The University of Salford. Data has been collected and analysed by experts at Bellway and the University of Salford to inform the construction of future homes to be highly efficient.

New homes provided by Bellway will achieve high standards of environmental performance and will meet the requirements of the Future Homes Standard. Homes will be expected to feature Heat Pumps, roof top solar alongside EV charging available for all homes. Additionally design features that maintain heat balance will be considered, with front doors not leading straight into living accommodation.

Wythall 7 – Local Green Space Sites

Bellway note Policy Wythall 7 as written. It has not been amended from the Regulation 14 draft and therefore the comments made previously are still relevant.

Harmony Wood is identified as proposed Local Green Space ('LGS') (Parish Council Site reference: H), which falls partly within land controlled by Bellway, on land South of Houndsfield Lane, Wythall ('the Site'). The policy states that *'the following sites [including Harmony Wood] ...are designated as Local Green Space sites, and other than in very special circumstances, no inappropriate development will be permitted that would harm their green character and reason for designation'*. Bellway responded to the LGS consultation undertaken in June 2024 (attached – Appendix 4).

As explained in the consultation response (June 2024) Bellway consider that the proposed development could be positive in assisting in the enhancement and/or maintenance of the LGS and would assist in opening up the area to the public which could support recreation and wellbeing. It is noted that the LGS assessment provided by the Parish Council confirms the wood (apart from the Public Right of Way 569C ('PRoW') that follows the woodland corridor) is not accessible to the public. The PRoW *'is a popular recreational route to Wythall Station from Hollywood. The remainder of the woodland is not accessible to the public but is a green corridor for wildlife'*. Bellway's development proposals propose to enhance this existing route so it can be enjoyed by the public.

It is considered that the proposed development will also assist in enhancing the richness of the wildlife by providing biodiversity enhancements. Bellway is committed to achieving at least 10% Biodiversity Net Gain (using a combination of onsite and offsite measures) and their development will seek to enhance the existing woodland corridor and create further benefits to local wildlife and the public alike. It is also considered that without the proposed development, the investment needed to preserve and enhance Harmony Wood, may not exist and therefore the potential increased public access and enjoyment would not be a possibility.

Wythall 8 – Biodiversity Gains from new development in Wythall Parish

Bellway object to policy Wythall 8 as written. The policy states *'new developments which are required to secure biodiversity net gain of at least 10% should meet this requirement on the application site and where this cannot be achieved, proposals should aim to meet biodiversity net gain requirements in accordance with local nature*

recovery priorities more broadly within Wythall Parish' [Savills Emphasis]. Although this is relatively flexible and uses the word 'aim' national policy is more flexible and the government guidance for Biodiversity Net Gain⁷ advises that 10% BNG can be achieved in 3 ways:

1. "They can create biodiversity on-site (within the red line boundary of a development site).
2. If developers cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site, or buy off-site biodiversity units on the market.
3. If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.

Developers can combine all 3 options, but must follow the steps in order. This order of steps is called the biodiversity gain hierarchy"

It is considered the policy should be amended to reflect the national guidance to make clear that there are a number of ways Biodiversity Net Gain can be achieved.

Wythall 9 – Support for Bus Services

Bellway note the amendments from the Regulation 14 consultation documents and these are welcomed. The amendments to parts a, b and c provide more flexibility, for instance part b) uses language like "if there is sufficient demand". It is considered that this should also be added to the first part of the policy so it states "if there is sufficient local demand major development should contribute towards measures to introduce and sustain improved public transport services in one or more of the following ways" [Savills Emphasis]. This will ensure that the policy is in accordance with NPPF paragraph 16 b) "plans should be prepared positively in a way that is aspirational but deliverable".

Wythall 10 – Support for Rail Services and Station Improvements

Bellway generally support Policy Wythall 10. As explained in the response to the Regulation 14 document, their proposed development can assist in improving rail services and station improvements. However, it still needs to be made clear in the policy or supporting text that this will be outside the remit of any developer and will be down to the rail network providers. The policy states:

"Major development proposals which contain measures to support a 30 minute railway service from Wythall Station or infrastructure improvements at Wythall Stations transport services in one or more of the following ways **will be supported**:

- a) **A station car park with EV charging facilities provided in a convenient location which reduces disruption to surrounding areas, preferable to the north east or south east of the station. A potential location is shown on Figure 20 as 'potential parking area 1**
- b) **A dedicated transport hub and waiting area for connecting road/rail services and demand responsive transport**
- c) **Redesigned access to platforms, including from car parking areas, to ensure that modern access standards are met.**
- d) **Improved platform shelters**
- e) **Live information screens which show connecting bus services.**
- f) **Modern ticket machines**
- g) **Secure cycle parking facilities**
- h) **Bike hire facilities for use throughout the Parish [Savills Emphasis]"**

⁷ <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>

Bellway, as explained in other responses above, is proposing to provide a 50 space car park facility to serve Wythall station commuters and the proposed local centre. The uses in the proposed local centre are yet to be confirmed and will be firmed up at Reserved Matters application stage.

Bellway are open to considering the suggested improvements listed at parts c)-h) of the policy, however, these will need to be in accordance with NPPF paragraph 58 and CIL Regulation 122 compliant. Paragraph 58 states that *“Planning obligations must only be sought where they meet all of the following tests*

- a) *necessary to make the development acceptable in planning terms;*
- b) *directly related to the development; and*
- c) *fairly and reasonably related in scale and kind to the development”.*

Furthermore, Bellway object to the additional wording being included at part a) of the policy: *“A potential location is shown on Figure 20 as ‘potential parking area 1’”*. This was only previously mentioned in the supporting text (paragraph 225 of the Regulation 14 draft). This land is owned by St Francis Property Group. Historically an outline application was submitted in 2010 on this land for a 50-space car park and 65 market and affordable dwellings and was refused based on it being inappropriate development in the Green Belt. There is no recent evidence presented to suggest that this land is available for a car park and therefore should not be referenced in the policy. The NPPF states at paragraph 36 plans are ‘sound’ if they are based on proportionate evidence. As written the policy is not in accordance with basic condition a) of the PPG which requires Neighbourhood Plan’s to have regard to national policies.

Wythall 11 – Support for improvements to priority walking and cycling

As set out in our response to the Regulation 14 consultation, Bellway support draft policy Wythall 11 which states *‘major development proposals are encouraged to support improvements to and well-marked signage for the following priority walking and cycling routes as set out in the policies Map and in Table 9’*. Priority walking and cycling route e) Red Cycling Route (RC3) goes through the Bellway Site. The current development options propose to retain and enhance this existing PRoW. We consider that this policy is in accordance with NPPF paragraph 109 e) which states development proposals should provide *‘opportunities to promote walking, cycling and public transport’* and therefore this policy accords with basic conditions a) and d)⁸ of the PPG.

We note that since the Regulation 14 draft two priority walking and cycling routes have been added g) Brown Cycling Route (BC4). j) Light Green Walking Route 3 (LGW3). LGW3 is adjacent to the eastern edge of the Site. Due to Bellway’s proposed development and other developments in the area it is likely route LGW3 will be improved with increased surveillance and lighting.

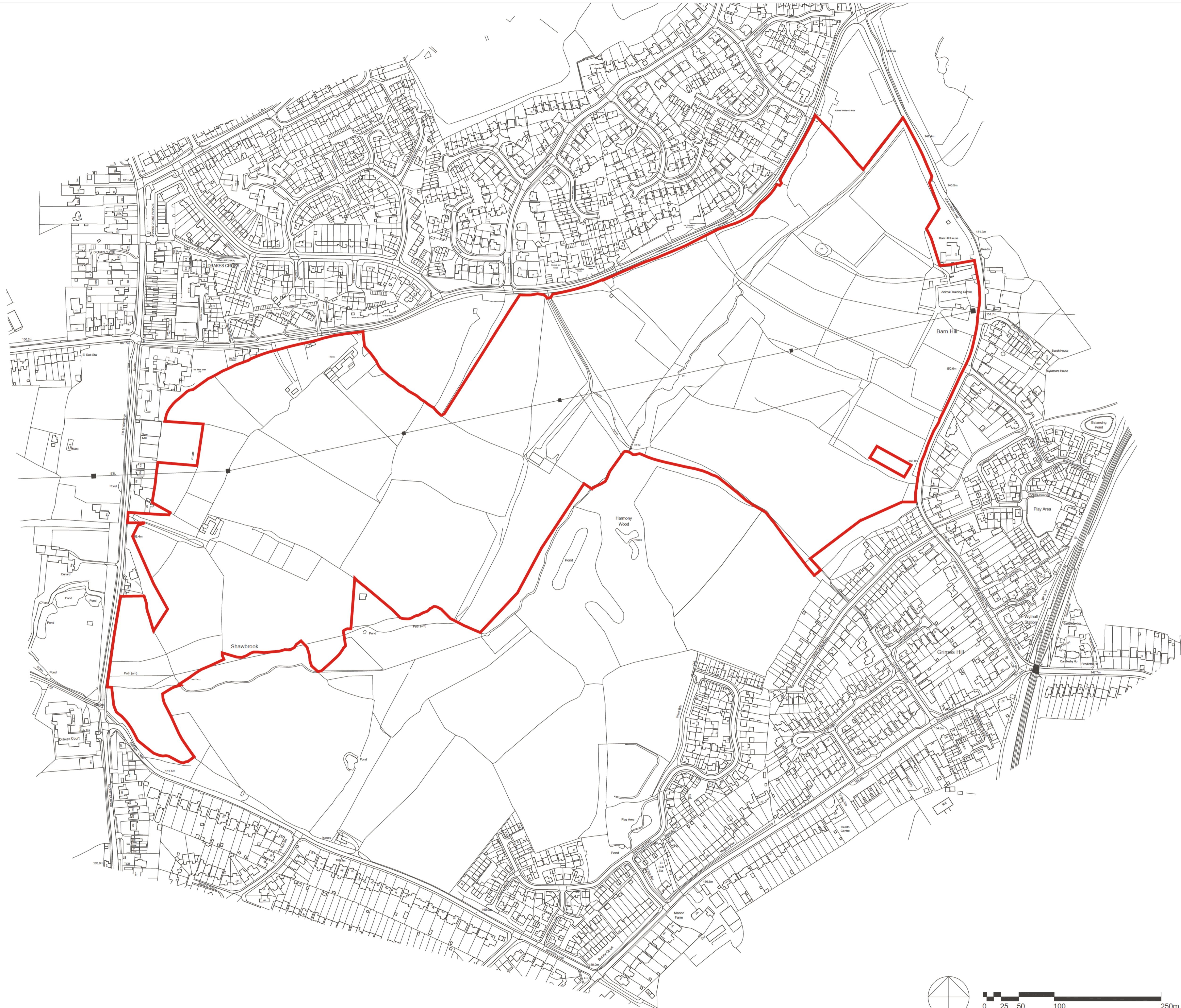
We trust the above responses are helpful and we welcome the opportunity to engage with Bromsgrove District Council in relation to the emerging Neighbourhood Plan.

Yours sincerely




Michael Davies
Savills (UK) Limited
Planning Director

⁸ PPG Paragraph: 065 Reference ID: 41-065-20140306



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KEY
 SITE BOUNDARY

P3 Issued for planning 11.03.2026 ES
 P2 Titleblock amended 10.03.2026 ES
 P1 Issued for comments 20.10.2025 ES

Rev	Description	Date	Reviewed By
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Drawn by	Reviewed by	Approved by	
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Client
 

Project
 LAND AT SOUTH OF HOUNDSFIELD LANE
 WYTHALL
 BROMSGROVE

Drawing Title
 SITE PLAN

ARCHITECTURE

Drawing / Document Reference	Status
WHY100538 - MCB - ZZ - DR - A - 0205	D5 - P3
Project Originator	Form Discipline Number

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Land South of Houndsfield Lane, Wythall Benefits Masterplan

Green Infrastructure, extensive public open spaces unlocked with new walking routes and enhancements at Harmony Wood

50% Affordable housings (up to 340 dwellings)

A 50 space car park and mobility hub to link with Wythall Train Station

Up to 680 residential dwelling with a range of type, tenure and mix

Creation of jobs and economic benefits brought locally

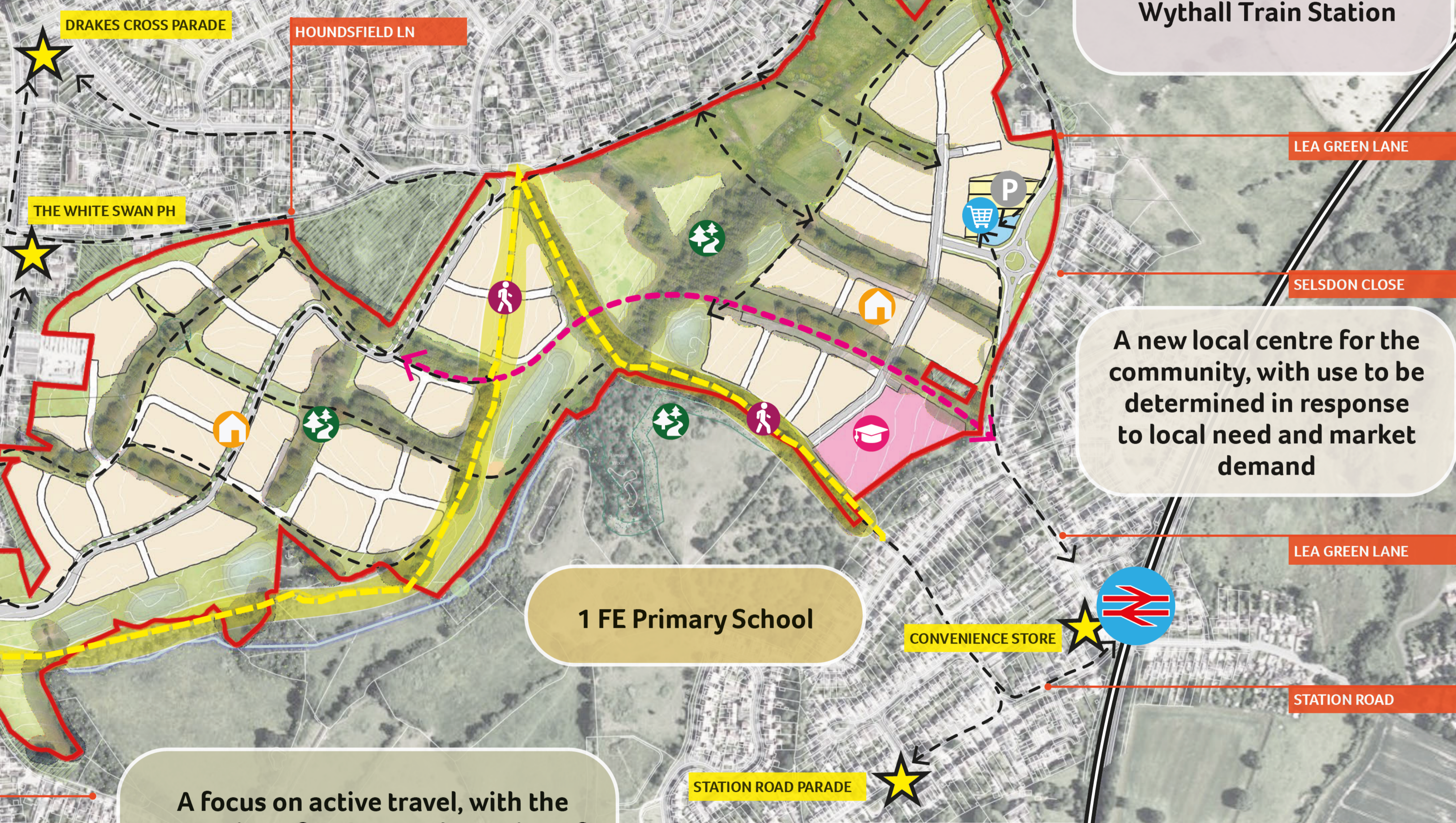
A minimum of 10% Biodiversity Net Gain to retain and enhance the range of habitats, hedgerows and watercourse on site

A new local centre for the community, with use to be determined in response to local need and market demand

1 FE Primary School

A focus on active travel, with the retention of PROWs and creation of new extensive pedestrian and cycle linkages to access local amenities, the station and recreational walking route

Highly sustainable house build including Future Homes Standard





Land at Wythall Drakes Cross

Green Belt Appraisal

Prepared by:
**The Environmental Dimension
Partnership Ltd**

On behalf of:
Bellway Homes Ltd

October 2025

Report Reference
edp3700_r003a

Document Control

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APPENDICES

Appendix EDP 1 Green Belt Appraisal Methodology

PLANS

Plan EDP 1: Landscape Planning Context
(edp3700_d011a 17 October 2025 JGr/JCI)

Plan EDP 2: Zone of Theoretical Visibility
(edp3700_d010a 17 October 2025 PDr/CMY)

Executive Summary

- S1 This Green Belt Appraisal has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bellway Homes to assess the suitability of land at Wythall Drakes Cross for potential release from the Green Belt and allocation for residential development. The assessment responds to the updated *National Planning Policy Framework* (NPPF; December 2024), including its provisions for 'Grey Belt' land.
- S2 The site comprises pastoral farmland on the edge of the Wythall settlement, identified as a sustainable location for growth. The appraisal draws on national policy, local plan evidence, landscape character assessments, and strategic Green Belt studies, including *Bromsgrove's Stage 2 Green Belt Study* (LUC, 2022), the *Wythall Site Assessments* (Bromsgrove District Council (BDC), 2025), and the *Exceptional Circumstances Topic Paper* (BDC, 2025).
- S3 Key findings include:
- The site is physically and visually well contained, with mature hedgerow trees, topography, and adjacent development reducing its contribution to Green Belt openness;
 - The site makes a limited contribution to the five purposes of Green Belt, with no role in preventing urban sprawl, the merging of towns, or protecting a historic setting. As such, the site is considered to meet the criteria for Grey Belt, and its release would not fundamentally undermine the purposes of the wider Green Belt; and
 - The site offers an opportunity to deliver sustainable residential development with the provision of new, or improvements to existing, green spaces that are accessible to the public, aligning with the NPPF's 'golden rules'.
- S4 The appraisal concludes that the site is suitable for release from the Green Belt and allocation for residential development, in respect of landscape and visual matters, as part of Bromsgrove's strategy to meet identified housing needs in full.

Section 1 Introduction

- 1.1 The Environmental Dimension Partnership (EDP) Ltd has been appointed by Bellway Homes Ltd to undertake a Green Belt (GB) Appraisal to inform potential residential development on land at Wythall Drakes Cross (hereafter referred to as ‘the site’), located within Bromsgrove District Council (BDC).
- 1.2 EDP previously conducted an environmental Appraisal of the Site in 2019, which included a review of Green Belt Matters, and have been asked to update this appraisal, considering the new *National Planning Policy Framework*, December 2024, updated 07 February 2025¹ (NPPF 2024).
- 1.3 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham, and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute² specialising in the assessment of the effects of proposed development on the landscape.
- 1.4 The site is an area of predominantly open farmland located between Wythall and Hollywood at the north-eastern edge of Bromsgrove District, Worcestershire. Based on the BDC *Settlement Hierarchy Review June 2025*³ Wythall/Hollywood is identified as one of the larger sustainable settlements in Bromsgrove.
- 1.5 The site is located approximately seven miles south of Birmingham City Centre. (see **Image EDP 1.1**).

¹ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf accessed 19.02.25

² LI Practice Number 1010

³ <https://www.bromsgrove.gov.uk/media/dd0p343z/settlement-hierarchy-topic-paper-2025.pdf>



Image EDP 1.1: Location of the site.

PURPOSE AND STRUCTURE OF THIS GREEN BELT APPRAISAL

- 1.6 The purpose of this Green Belt Appraisal is to test whether bringing forward sustainable development on this site would allow the key purposes of the Green Belt, in the context of the wider settlements of Wythall and Hollywood, to be maintained, or possibly even enhanced. This appraisal is crucial for understanding the potential impact of residential development on the Green Belt and the surrounding settlements.
- 1.7 In undertaking the assessment, EDP has:
- Reviewed relevant policy and background documents in **Section 2**;
 - Assessed the existing (baseline) landscape character and visual context of the site and its setting, **Section 3**;
 - Drawn on the findings of multiple strategic and local Green Belt assessments, including the *Bromsgrove Stage 2 Green Belt Study* (LUC, 2022), the *Site Assessments for Wythall* (BDC, 2025), and the *Green Belt Exceptional Circumstances Topic Paper* (BDC, 2025), to ensure alignment with the most up-to-date evidence base informing the emerging Local Plan. (**Section 4**);

- Assessed the site's contribution to Green Belt purposes and considered whether the release of the site would be found 'not inappropriate' in the light of the NPPF 2024 at **Section 5**; and
- Reached overall conclusions in **Section 6**.

Section 2 Policy Context and Other Considerations

NATIONAL POLICY

National Planning Policy Framework

2.1 The NPPF 2024 has been thoroughly reviewed and makes several references to the Green Belt that are relevant to this report, as noted below.

2.2 Section 2: Achieving sustainable development, paragraph 11, states that (emphasis added by edp):

“Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area [note 7]; or*

ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

[note 7]: The policies referred to are those in this Framework (rather than those in development plans) relating to: ... land designated as Green Belt.”

2.3 Section 13: Protecting Green Belt land, paragraph 142, sets out the ‘fundamental aim’ and ‘essential characteristics’ of Green Belt stating that (emphasis added by edp):

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

2.4 Section 13 paragraph 143 sets out the five purposes of Green Belt stating that:

“Green Belt serves the following five purposes [letters a-e replaced by numbering by edp for ease of reference]:

1. *to check the unrestricted sprawl of large built-up areas;*
2. *to prevent neighbouring towns merging into one another;*
3. *to assist in safeguarding the countryside from encroachment;*

4. *to preserve the setting and special character of historic towns; and*
 5. *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 2.5 Paragraphs 145 and 146 relate to alteration of GB boundaries, stating that (emphasis added by EDP):
- “145. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. ...*
- 146. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries by the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”*
- 2.6 The NPPF 2024 sets out considerations about proposals affecting the Green Belt at paragraphs 153 to 156.
- 2.7 Paragraph 153 relates to harm due to inappropriate development in the Green Belt, stating that (emphasis added by edp):
- “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness [note 55]. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt because of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*
- [note 55] Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.”*
- 2.8 Paragraph 154 clarifies the meaning of inappropriate development stating (emphasis added by edp):
- “Development in the Green Belt is inappropriate unless one of the following exceptions applies:*
- e) *limited infilling in villages; ... and*
 - g) *limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.”*

- 2.9 Paragraph 155 provides further clarification of inappropriate development (emphasis added by edp):

“The development of homes, ... in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed [note 56];*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

[note 56] Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years”.

- 2.10 Paragraph 156 sets out the golden rules referenced in paragraph 155 stating (emphasis added by edp):

“156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review [note 58], or on sites in the Green Belt subject to a planning application [note 59], the following contributions (‘Golden Rules’) should be made:

- a. affordable housing ...;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*

...

159. The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.”

2.11 Annex 2: Glossary defines Grey Belt as:

“land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).”

Summary of NPPF 2024 in Relation to Green Belt

2.12 In summary, the NPPF 2024 allows that development in Green Belt will no longer be limited to ‘exceptional circumstances’; in contrast development in the Green Belt should be regarded as appropriate where:

- The local planning authority cannot demonstrate that it ‘can meet its identified need for homes, commercial or other development through other means’; and
- The development:
 - Would not ‘fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’;
 - Would utilise ‘previously developed’ or ‘Grey Belt’ land in sustainable locations;
 - Would provide the contributions set out in NPPF 2024 paragraph 156, as summarised below; and
 - Would comprise ‘limited infilling’, which would not cause ‘substantial harm to the openness of the Green Belt’.

2.13 Grey Belt land is defined as *“land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).”*

2.14 The contributions set out in NPPF 2024 paragraph 156 require that where ‘major development’ (which is undefined) takes place on land which has been released from the Green Belt, contributions should be made with respect provision of: social housing (on residential schemes); national infrastructure; and quality and accessibility to green spaces.

2.15 No guidance is provided regarding how to judge whether land makes a limited contribution to the Green Belt purposes, however, government thinking in this regard is illuminated, to some degree, by its consultation prior to publication of NPPF 2024, which proposed incorporating the following into the glossary appended to the NPPF:

“Land which makes a limited contribution to the Green Belt purposes will:

- a) Not strongly perform against any Green Belt purpose; and

b) Have at least one of the following features:

- i. Land containing substantial built development or which is fully enclosed by built form
- ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another
- iii. Land which is dominated by urban land uses, including physical developments
- iv. Land which contributes little to preserving the setting and special character of historic towns.”

Planning Practice Guidance

2.16 *National Planning Practice Guidance (NPPG) Green Belt* (published July 2019, last updated December 2023)⁴ sets out advice on the role of the Green Belt in the planning system. It identifies several matters which may need to be considered in assessing the impact of a proposal on the openness of the Green Belt. These factors are cited below:

“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be considered in making this assessment. These include, but are not limited to:

- *openness can have both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – considering any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*⁵

LOCAL POLICY

2.17 The current *Bromsgrove District Plan* (adopted January 2017) includes Policy BDP4 (Green Belt) which protects Green Belt land and notes that a Green Belt review would be undertaken before 2023 to meet longer-term development needs.

2.18 Indeed, the 2017 Plan anticipated that approximately 2,300 homes (beyond the 4,700 already allocated on non-Green Belt land) would need to be identified through a Green Belt review by 2023 to meet housing requirements up to 2030.

⁴ <https://www.gov.uk/guidance/green-belt> accessed 13.10.24

⁵ NPPG Green Belt Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019

2.19 Paragraph BDP4.2 states:

“Land required to deliver the growth of the District during the plan period may be removed from the Green Belt through a Local Plan Review. This will be done as part of a full Green Belt Review, to be completed by 2023 at the latest”.

2.20 Wythall is recognised in the settlement hierarchy as a sustainable location for growth⁶, and sites on the edge of Wythall have been under consideration in the ongoing Local Plan Review.

Emerging Local Plan

2.21 BDC is now preparing a new Local Plan up to 2043. As part of this, the Council has produced an *Exceptional Circumstances for Green Belt Release* topic paper (April 2025)⁷ which sets out the justification for removing some land from the Green Belt.

2.22 In summary, Bromsgrove cannot meet its substantial housing and employment needs within the current urban/brownfield footprint alone, so exceptional circumstances are deemed to exist to release Green Belt land for development. The NPPF’s examination of all alternatives has been addressed by prioritising brownfield sites, optimising densities in built-up areas, and discussing unmet needs with adjoining authorities.

2.23 Having done so, Bromsgrove has concluded that Green Belt adjustments are unavoidable if development needs are to be met in full.

2.24 The emerging plan’s evidence base includes comprehensive site assessments for Green Belt sites around settlements including Wythall, which are reviewed in detail in **Section 4**.

⁶ <https://www.bromsgrove.gov.uk/media/dd0p343z/settlement-hierarchy-topic-paper-2025.pdf>

⁷ <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1749812184/projects/6800ca4384ffa326efc00a71/media-upload/Green%20Belt%20Exceptional%20Circumstances%20Paper.pdf/ebxrdbdusxhozvtsqu6.pdf>

Section 3

Landscape Character and Visual Amenity

- 3.1 An understanding of the character and visual amenity of the site and context is relevant to understanding the contribution that the site makes to the purposes of the Green Belt as set out in the NPPF 2024 and the Local Plan.
- 3.2 The site falls within the Timbered Pastures Landscape Character Type described in the *Worcestershire Landscape Character Assessment 2012*⁸.

TIMBERED PASTURES DESCRIPTION

“The Timbered Pastures landscape is a small-scale, settled, pastoral landscape with filtered views due to the dense scattering of mature hedgerow oaks, which impart a sense of scale, maturity, and historical continuity. It is described as a “complex landscape, reflecting its history as relic common land and former wood pasture, evident in a mosaic of irregular and geometric field patterns with dispersed farms and linear settlement patterns”.

- 3.3 This is a visually enclosed landscape, dominated by oak trees lining hedgerows and dense networks of minor lanes. It is also of high ecological interest, supporting unimproved pasture, field ponds (often from marl pits), and wet heathy vegetation.
- 3.4 The presence of mature oaks is critical, though under threat due to insufficient replacement planting. Urbanisation, road pressures, and land use changes (e.g., to arable or horse paddocks) are seen to be diluting its character.
- 3.5 Key Features of Timbered Pastures Landscape Type include:
- Dominant cover of mature hedgerow oaks;
 - Ancient wooded character;
 - Small, well-defined hedged fields;
 - Predominantly pastoral land use; and
 - Dense network of minor lanes.

On site Character Assessment

- 3.6 The site is located between two development areas urbanised by intervisibility with each settlement.

⁸ <https://www.worcestershire.gov.uk/council-services/planning-and-developments/environmental-policy/landscape-character-assessment>

- 3.7 Tranquillity is reduced due to the proximity of transport infrastructure, and the rural nature is compromised by the presence of pylons and landscape degradation resulting from hedge removal, as well as general landscape decline.
- 3.8 The site comprises an area of greenfield land situated immediately south of Houndsfield Lane and north of Station Road, in the parish of Wythall. It includes roughly 15–16 field parcels of grazing land (improved and semi-improved grassland) separated by hedges and tree lines.
- 3.9 A feature of the site is its use for ‘horsiculture’, often a feature of peri-urban landscapes.
- 3.10 Some internal hedgerows have gaps or are low, but many mature trees (especially oak) are scattered along field boundaries, giving the area a well-treed appearance. There are a few small structures within the site: for example, some plots may contain simple agricultural sheds or stables for horses, especially along the eastern site boundary close to the public right of way (PRoW), but there is no significant built development on the site (it is essentially open Green Belt land).
- 3.11 The northern boundary is formed by Houndsfield Lane along which lies at the southern edge of Hollywood (a contiguous residential area inset from the Green Belt). – see **Images EDP 3.1** and **3.2**).



Image EDP 3.1: Houndsfield Lane looking east.



Image EDP 3.2: Junction of Houndsfield Lane and Simms Lane.

- 3.12 A feature of Houndsfield Lane is its very well-established hedgerow trees.
- 3.13 Gorsey Lane borders the southern edge of the site (see **Image EDP 3.3**). There is a line of protected mature trees along Gorsey Lane marking that boundary.



Image EDP 3.3: View into the site looking north from Gorsey Lane.

3.14 The A435 Alcester Road defines the western boundary. (See **Image EDP 3.4**)



Image EDP 3.4: Alcester Road looking north.

- 3.15 The eastern boundary of the site follows Lee Green Lane beyond which lies open land that separates Wythall from settlements in Solihull (such as Dickens Heath and Tidbury Green).
- 3.16 Through the centre of the site is a PRoW which leads to Harmony Wood and is lined with hedgerows and trees (see **Images EDP 3.5** and **3.6**).



Image EDP 3.5: Entrance to Harmony Wood PRoW from Houndsfield Lane.

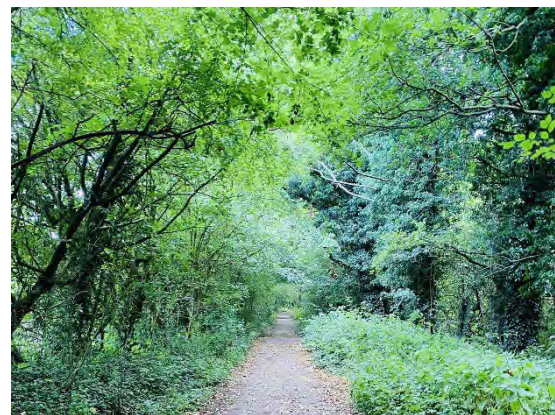


Image EDP 3.6: View along PRoW through Harmony Wood on the edge of the eastern site boundary.

- 3.17 In terms of topography the land within the site is gently undulating. A small valley (a tributary of the River Cole) runs east to west roughly along the southern boundary of the site, a feature of which is a dense vegetated belt following the water course. (see **Images EDP3.5** and **EDP3.6**).



Image EDP 3.7: View looking south along the southern site boundary



Image EDP 3.8: View into the site looking north.

- 3.18 The fields are mainly used as pasture and horse paddocks of varying degrees of quality and are divided by hedgerows, mature trees, and fencing. (see **Image EDP 3.7**).



Image EDP 3.9: Image looking south from PRoW WYTHAL 568(B), demonstrating the segregation of field parcels for horse grazing.

- 3.19 In summary, the site is an open agricultural area characterised by pastoral fields and mature hedgerow trees with a rural character with some urban influences.
- 3.20 It is enclosed on four sides by a combination of existing development and infrastructure. The built-up areas to the north and south, and roads to the east and west, while these features give the site a well-defined perimeter, also create some urbanising effects.

Visual Amenity

- 3.21 A field assessment carried out on 26 June 2025 confirmed that the site is visually well contained by vegetation and settlement at and just beyond the site boundary.
- 3.22 The Zone of Theoretical Visibility (see **Plan EDP 2**) demonstrates that the effect of the proposal is likely to be limited to the site and its immediate context, comprising agricultural land:
- Falling between the site and settlement edge to the south of the site; and
 - To the north-east of the site, beyond Lea Green Lane.
- 3.23 Views of the proposals would largely be limited to, or filtered by, site boundary vegetation.
- 3.24 In addition, where apparent, the site would generally be seen in the existing settlement context and would not appear out of character or incongruous.

Site Comparison vs. Timbered Pastures Character

- 3.25 The site reflects the rolling topography, pastoral land use, and dense mature oak boundaries typical of the Timbered Pastures landscape.
- 3.26 The site also exhibits semi-urbanising influences due to its proximity and intervisibility to Wythall, nearby development, and infrastructure, such as pylons.
- 3.27 The site retains a relatively high-quality landscape fabric, with many mature trees that would support integration of development within a strong landscape framework.
- 3.28 The site is also visually enclosed in many areas, with limited long views, but with sensitive receptors, including local PRowS, road users, and adjacent dwellings.
- 3.29 The presence of a stream valley, hedgerow oaks, and pasture fields aligns closely with the intrinsic character of Timbered Pastures. However, the integrity of the character is somewhat eroded near settlement edges.

Key Contrasts

- 3.30 Unlike more remote or intact areas of Timbered Pastures, the site is influenced by existing residential development and urban fringe activities, resulting in some dilution of the rural perception.
- 3.31 Visual containment is good, but semi-urban elements such as pylons and close settlement proximity reduce the sense of complete rurality.

Conclusion

- 3.32 The site remains broadly consistent with the Timbered Pastures landscape character, particularly in terms of mature tree cover, pastoral use, and enclosure pattern. However, urban edge pressures introduce a degree of contrast, highlighting the need for sensitive development that retains and enhances key character features such as hedgerow oaks, field ponds, and small-scale enclosure.

Section 4

Appraisal of the Bromsgrove District Council Green Belt Assessment

- 4.1 Bromsgrove’s Green Belt review process has been conducted in phases. An earlier strategic Green Belt Assessment (Green Belt Purposes Assessment (Part 1) 2019)⁹ divided the district into large parcels and scored them against the first three Green Belt purposes (national policy purposes 1, 2, and 3). The site was part of a broad parcel (identified as Parcel NE6: ‘South of Hollywood, north of Wythall’).

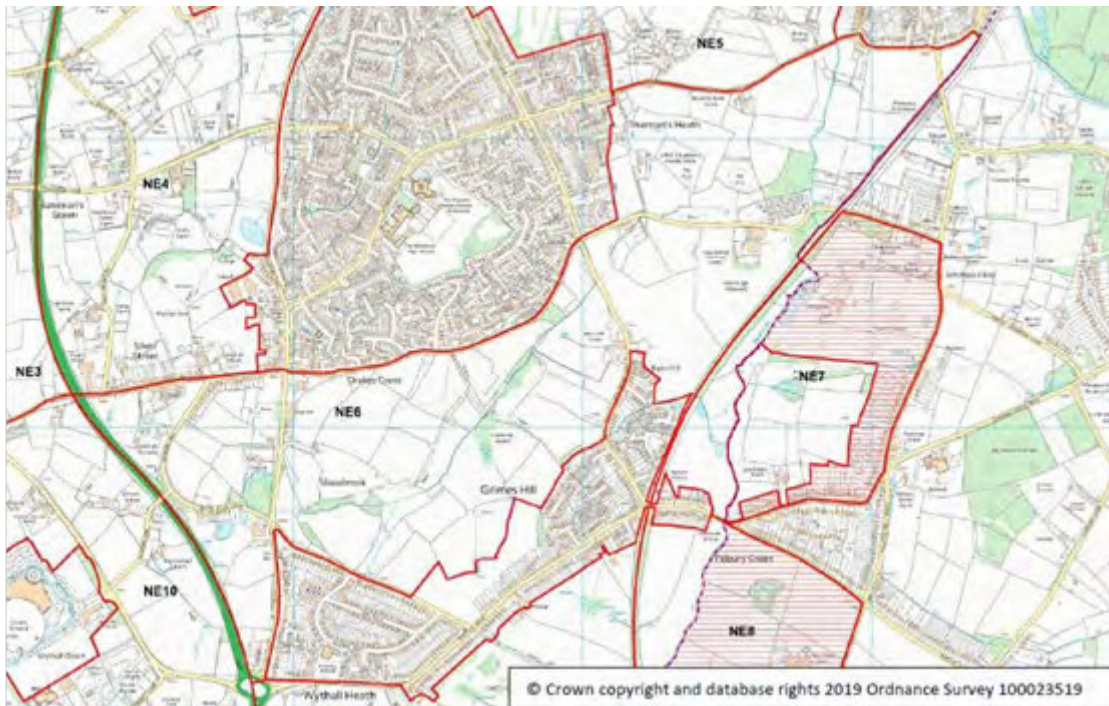


Image EDP 4.1: Extent of Land Parcel NE6.

- 4.2 Parcel NE6, encompassing a large swathe of land between the Wythall and Hollywood extending eastward, was scored as having No Contribution to checking sprawl (not adjacent to a large built-up area like Birmingham), a Strong role in preventing merging (because the whole parcel constituted most of the gap between settlements), and a Moderate role in safeguarding countryside (rural character with some urban influence). This broad-brush assessment flagged the importance of the open gap in general. However, it did not distinguish finer-grained variations within the parcel – for example, it treated the entire Hollywood–Wythall gap uniformly, even though parts of that area are visually and functionally semi-enclosed by development, as discussed later.
- 4.3 Bromsgrove District Council’s *Stage 2 Green Belt Study* (2022)¹⁰, undertaken by LUC, provides a detailed assessment of Green Belt Parcel WY18 which broadly corresponds to

⁹ <https://www.bromsgrove.gov.uk/council/policy/planning-policies-and-other-information/bromsgrove-district-local-plan-other-information/evidence-base/green-belt-purposes-assessment-part-1/>

¹⁰ <https://www.bromsgrove.gov.uk/council/policy/planning-policies-and-other-information/bromsgrove-district-local-plan-other-information/evidence-base/green-belt-study-part-2/>

the site although extending south to Wythall and east across to the railway line. (see **Image EDP 4.2**).

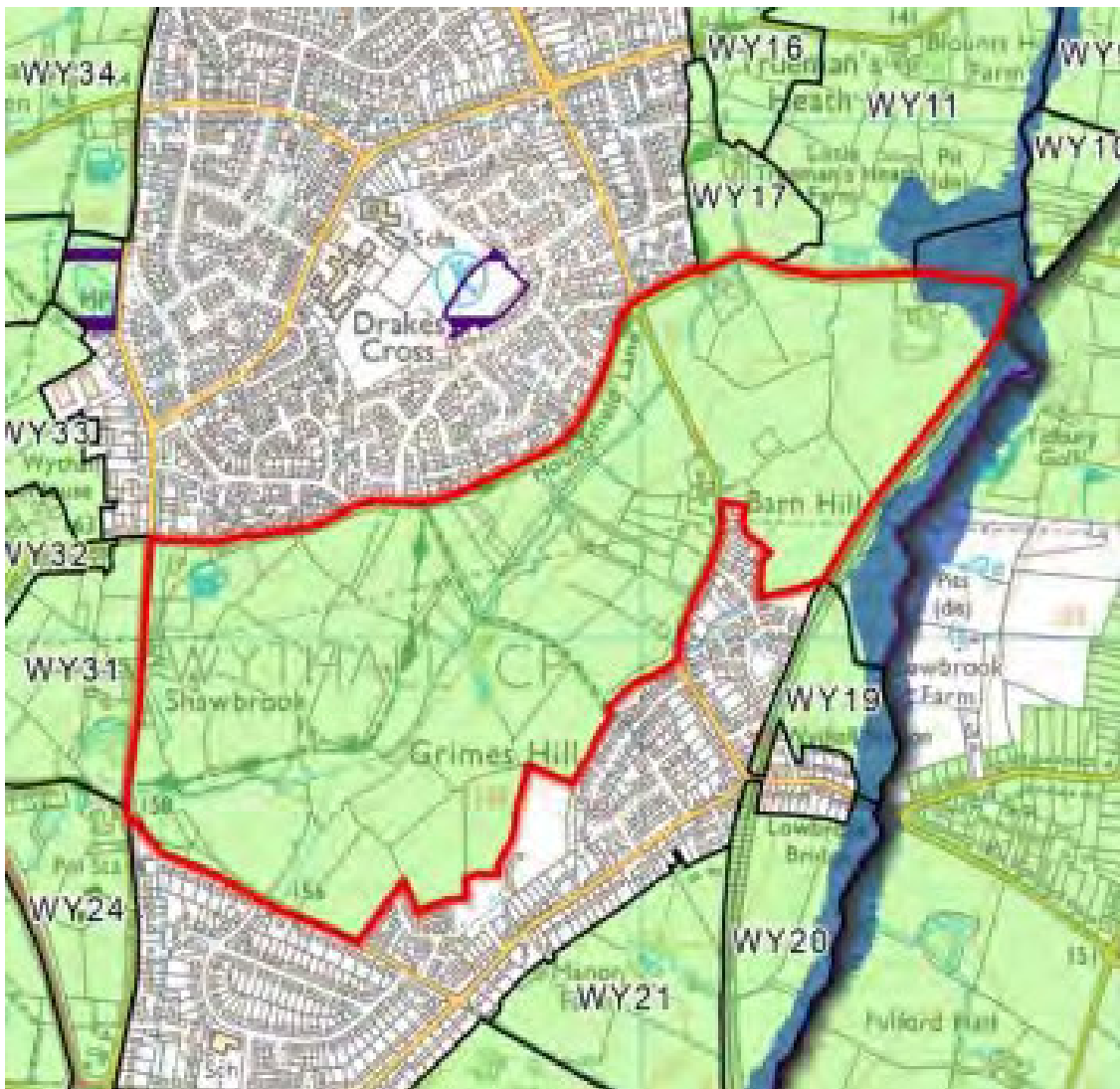


Image EDP 4.2: Extent of Parcel WY18¹¹

4.4 This Stage 2 study evaluates the parcel against the first three Green Belt purposes defined in the NPPF and assigns a harm rating to its potential release. The LUC conclusions for WY18 can be summarised as follows:

- **Purpose 1 – Check the Unrestricted Sprawl of Large Built-up Areas:** Parcel WY18 adjoins the settlement of Wythall/Hollywood rather than a major urban conurbation. However, Birmingham’s built-up area lies nearby. LUC finds that releasing this land would not lead to significant sprawl of the West Midlands conurbation. The site is not directly adjacent to the Birmingham urban edge and has some existing features (e.g. Houndsfield Lane and its associated vegetation) separating it from the

¹¹ <https://www.bromsgrove.gov.uk/media/yveamwv1/bromsgrove-stage-2-green-belt-study-report-final-220607-appendix-a-part2.pdf>

conurbation. Therefore, harm to Purpose 1 from releasing WY18 is judged to be Low (in effect 'low or no' harm);

- **Purpose 2 – Prevent Neighbouring Towns from Merging:** The study notes that while Hollywood to the north could be considered a town, Wythall to the south is not, and the nearest sizeable town (Redditch) is too distant for this parcel to prevent town coalescence meaningfully. WY18 lies at the periphery of a gap between Hollywood and Major's Green, at the western edge of Solihull, which forms part of the wider gap between Wythall/Hollywood and Shirley (in Solihull). Crucially, a strong existing boundary along Houndsfield Lane would remain to the north of the site, and development here would not undermine the separation of larger settlements. Accordingly, LUC concludes that releasing WY18 would cause Low harm to Purpose 2 (no material reduction in the gap between towns); and
- **Purpose 3 – Safeguard the Countryside from Encroachment:** WY18 consists mainly of open agricultural fields, which unequivocally characterise the countryside, and presently helps safeguard this area from urban encroachment. Some parts of the parcel have a strong sense of distinction from the built-up edges (aided by the tree-lined watercourse and sloping land in the centre of the parcel). Other edges are weaker (e.g. where back gardens abut the site), but overall LUC considers the land to be playing a meaningful role in keeping the countryside open. The release of WY18 for development would therefore represent an encroachment into open countryside, resulting in Moderate harm to Purpose 3. LUC notes explicitly that any partial development (sub-parcel release) would weaken the openness of the remainder, and that the whole parcel's countryside function would be moderately harmed if it were released.

REVIEW OF ADDITIONAL APPRAISALS

- 4.5 Subsequently, more detailed 'Part 2' Green Belt Assessment work and site-specific assessments have been undertaken. In the *Bromsgrove Site Assessment Appendix 7: Wythall* (Feb 2025),¹² Site 203 (Land south of Houndsfield Lane, west of Lea Green Lane – corresponding to the site) was evaluated.
- 4.6 This 2025 assessment assigned the site to a 'Moderate' Green Belt Harm category, meaning releasing this land would have a moderate impact on Green Belt purposes.
- 4.7 Notably, the assessment commentary recognises that development here “*would result in the loss of Green Belt separating Hollywood and Wythall*”, but also that in terms of the national Green Belt purposes, this gap is considered less significant because Hollywood and Wythall are essentially parts of the same settlement for strategic assessment purposes.
- 4.8 The local distinction between the two neighbourhoods is acknowledged as a consideration for local planning, but it is not regarded as a fundamental Green Belt function in the

¹² <https://www.bromsgrove.gov.uk/media/in1luhms/appendix-7-wythall-site-assessments-2025.pdf>

strategic sense. The site was found to have few constraints and was ultimately concluded to be “*a good option for allocation*” in the new plan.

- 4.9 In other words, the Council’s latest evidence suggests that this site is a strong candidate for removal from the Green Belt and allocation for development, given the district’s needs.

Section 5 EDP's Green Belt Appraisal

- 5.1 EDP have considered previous Green Belt appraisals and summarised the findings using NPPG tables as outlined below.

PURPOSE A – TO CHECK THE UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS

- 5.2 The site is not contiguous with a major built-up area, such as Birmingham. It is enclosed by development to the north and south (Hollywood and Wythall) and framed by roads and hedgerow boundaries to the east and west. As such, it does not provide an open buffer to a major conurbation. The settlement edges it relates to are self-contained and established, and development on this site would represent infill rather than outward projection. Under the EDP methodology, this constitutes no contribution to Purpose A.

Table EDP 5.1: Purpose A – Illustrative Features

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: <ul style="list-style-type: none"> • be adjacent or near to a large built-up area; and • if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt).
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development- be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development- contain existing development- being subject to other urbanising influences.
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built-up area- are adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development.

PURPOSE B – TO PREVENT NEIGHBOURING TOWNS FROM MERGING

- 5.3 There is no critical strategic gap at this location between distinct towns. Hollywood and Wythall are contiguous in urban form and functionally part of the same settlement. The site does not form part of a separation belt between Birmingham and Solihull, nor does it sit between any settlements with distinct identities requiring preservation through openness. The nearest town-scale separation is between Wythall and Shirley, but this remains well-buffered by landscape and infrastructure features to the east (River Cole and railway). Therefore, under the EDP criteria, the site makes no contribution to Purpose B.

Table EDP 5.2: Purpose B – Illustrative Features

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: <ul style="list-style-type: none"> forming a substantial part of a gap between towns; and the development of which would be likely to result in the loss of visual separation of towns.
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns- being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation.
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.

PURPOSE D – TO PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS

5.4 There are no historic towns in proximity to the site, and the parcel does not contribute to the setting of any such location. It is not within or adjacent to a conservation area, and there is no visual or experiential link between the site and any heritage townscape. Therefore, its contribution to this purpose is assessed as ‘None’.

Table EDP 5.3: Purpose D – Illustrative Features

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and to include all of the following features: <ul style="list-style-type: none"> form part of the setting of the historic town; and make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town.
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): <ul style="list-style-type: none"> being separated to some extent from historic aspects of the town by existing development or topography; and containing existing development- not having an important visual, physical, or experiential relationship to historic aspects of the town.

Contribution	Illustrative Features
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town- have no visual, physical, or experiential connection to the historic aspects of the town

PURPOSE C – TO SAFEGUARD THE COUNTRYSIDE FROM ENCROACHMENT

- 5.5 For completeness, an assessment of purpose C is included below.
- 5.6 The site lies within the Timbered Pastures Landscape Character Type and exhibits characteristics of pastoral land use, including tree-lined hedgerows and filtered views. However, it is visibly influenced by adjacent housing, infrastructure, and utilities (including pylons). Its perimeter is mostly built form and bounded by roads. While the interior land parcels are open, the overall perception is of semi-urban fringe, rather than remote countryside. Nevertheless, development here would still urbanise an area of undeveloped land with countryside character. As such, the site is judged to make a 'Moderate' contribution to Purpose C.
- 5.7 Development could be accommodated without fundamentally undermining the 'countryside' experience, because the site already feels partly urban.
- 5.8 Based on the assessment, as the parcel is not entirely without Green Belt value, its development would have a moderate adverse effect by reducing local openness and rural character, even though strong boundaries exist.
- 5.9 Thus, the site can be acknowledged as having moderate encroachment harm (Purpose 3) and still be considered for release under the hierarchy for Green Belt land release (NPPF 2024, para 148).

Section 6 Conclusions

- 6.1 The revised *National Planning Policy Framework* (NPPF) (2024) explicitly allows local plans to review Green Belt boundaries where needed for development, prioritising land that is previously developed or ‘Grey Belt’ (land not strongly serving purposes 1, 2, or 4).
- 6.2 In this context, the WY18 site’s updated appraisal as a Moderate-harm, low-performing Green Belt parcel suggests that, while its release would indeed impact local countryside openness, it remains one of the less critical Green Belt areas in Bromsgrove District in terms of fulfilling the Green Belt’s core strategic purposes. Both the Council’s evidence and EDP’s analysis indicate that development here could be contemplated without fundamentally undermining the purposes (taken together) of the remaining Green Belt across the area of the plan – provided that any Green Belt release is carefully planned and justified against the latest national policy tests and the new “Golden Rules” for Green Belt development in NPPF 2024).
- 6.3 By the Bromsgrove District Council’s (BDC) own assessment the site qualifies as Grey Belt, with no substantial contribution to Purposes a, b, or d, and is therefore capable of release, subject to wider Green Belt and planning tests.
- 6.4 In terms of openness (Purpose c), the site makes a moderate contribution; however, this can be mitigated through design, landscape buffers, and the retention of mature tree and hedgerow structures.
- 6.5 Since the site comprises Grey Belt, together with the fact that it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. The site is considered appropriate for release for well-designed residential development, subject to compliance with wider policy and delivery of the Golden Rules.
- 6.6 The site benefits from a robust landscape framework, including mature hedgerow trees and field boundaries. A landscape-led approach to development, including retention and enhancement of these features, would ensure minimal impact on the physical elements of the landscape character and on visual intrusion. It would also provide an opportunity to deliver environmental enhancements aligned with Worcestershire’s landscape character area (LCA) guidelines for Timbered Pastures, including the provision of new or improved green spaces that are accessible to the public, in line with the NPPF Golden Rule c.

Appendix EDP 1 Green Belt Appraisal Methodology

INTRODUCTION

A1.1 Provided within this section is the methodology used by EDP for the consideration, in landscape and visual terms, of Green Belt open character.

NATIONAL POLICY AND GUIDANCE

A1.2 The *National Planning Policy Framework* (NPPF; December 2024)¹³, and *National Planning Practice Guidance* (NPPG) *Green Belt* (Published 22 July 2019)¹⁴ provide the latest policy and guidance in relation to Green Belt. Matters of relevance to the consideration of development within the Green Belt, in relation to landscape and visual considerations, are reviewed below.

A1.3 NPPF Section 13: Protecting Green Belt Land opens by stating that the Government attaches great importance to Green Belts and that “*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*” (NPPF para. 142).

A1.4 The NPPF continues stating that the GB serves five purposes, a to e, as set out below with numbering added by EDP for ease of reference:

1. “*To check the unrestricted sprawl of large built-up areas*”;
2. “*To prevent neighbouring towns merging into one another*”;
3. “*To assist in safeguarding the countryside from encroachment*”;
4. “*To preserve the setting and special character of historic towns*”; and
5. “*To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*”.

METHODOLOGY

A1.5 The assessment methodology to inform decisions regarding the appropriateness of homes, commercial and other development within the Green Belt in relation to landscape and visual matters only, the following steps are undertaken:

1. **Infill:** Undertake an appraisal of whether the Proposed Development is considered to be appropriate against the criteria set out within NPPF Para. 154 (including whether the Proposed Development is deemed to be *‘limited infilling or the partial or complete*

¹³https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [accessed 19.02.25].

¹⁴ <https://www.gov.uk/guidance/green-belt> (accessed 08.04.25)

*redevelopment of previously developed land*¹⁵. If it does, then it is deemed to comprise appropriate development. If not, then proceed to step 2;

2. **Grey Belt:** Establish wherever the site is identified as Grey Belt by the local planning authority (LPA) within development plans or Green Belt assessments. If it is then development is appropriate if it also conforms with further planning related tests set out at NPPF para. 155 b, c and d.
3. **Grey Belt:** Where the site is not identified by the LPA as grey belt, undertake an assessment to determine whether or not it comprises Grey Belt in light of the NPPF¹⁶, NPPG, and case law, as set out in the following steps. This assessment to be based on the findings of the LPA Green Belt assessment, where present/relevant:
 - i. Does the site fall within areas and assets of particular importance, as identified in footnote 7 to the NPPF (other than Green Belt), or would development of the site affect other areas and assets of importance beyond the site, to a point where there would be a strong reason to restrict development:
 - Where there is a strong reason to restrict development of the site as a whole, consider further work to inform more detailed specific proposals to limit the affect; and
 - Where there is no strong reason to restrict development of the site move to step ii.
 - ii. Does the site strongly contribute to the Green Belt purposes a, b or d¹⁷ when using the considerations for informing these judgements as set out in the NPPG and set out in **Annex EDP 1.1** .
 - Where the site does contribute strongly to any of the Green Belt purposes a, b or d, and so does not qualify as Grey Belt, is there merit in considering specific site areas rather than the site as a whole; and
 - If the site does not contribute strongly to any of the Green Belt purposes a, b or d it is Grey Belt and development is appropriate subject to compliance with the additional requirements of NPPF para. 155 a, b, c and d, of which a and d are of relevance here – move to steps 4 and 5.

¹⁵ Para. 154 states that development is appropriate where one of eight exceptions apply, of which two are of some relevance to landscape which can contribute to considerations of whether development comprises infilling, including within indents at settlement edges

¹⁶ Grey belt land is defined in the NPPF which states that for the purposes of plan-making and decision-making Grey Belt is: “*land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.*” (NPPF Glossary)

¹⁷ As defined by NPPG Para. 005, “*When making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d*”.

“a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

d. Where applicable [in relation to major development] the development proposed meets the ‘Golden Rules’ requirements “

4. **Purposes (taken together) of the remaining Green Belt:** Consider whether development of the site would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. This would include consideration of Purposes c and e in addition to consideration of Purposes a, b, and d undertaken above (in relation to grey belt land). However, as Purpose e (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) falls outside the scope of this assessment only Purpose c (to assist in safeguarding the countryside from encroachment) is considered, as set out in paragraph **A1.2**;
5. **Golden Rules:** Consider whether the proposals comprise major residential development. If so consider whether they can provide the contributions set out in the Golden Rules in landscape and visual terms, of which those relating to the provision of new, or improvements to existing, green spaces that are accessible to the public are of relevance to landscape matters.

ANNEX EDP 1.1: ASSESSMENT OF PURPOSES A, B AND D (TAKEN FROM NPPG GREEN BELT PARAGRAPH: 005)

Purpose A – To Check the Unrestricted Sprawl of Large Built-up Areas

A1.6 This purpose relates to the sprawl of large built-up areas. Villages should not be considered large built-up areas.

Table EDP A1.1: Purpose A – Illustrative Features

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: <ul style="list-style-type: none"> • be adjacent or near to a large built-up area; and • if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt).
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development- be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development- contain existing development- being subject to other urbanising influences.

Contribution	Illustrative Features
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built-up area- are adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development.

Purpose B – To Prevent Neighbouring Towns Merging Into One Another

A1.7 This purpose relates to the merging of towns, not villages.

Table EDP A1.2: Purpose B – Illustrative Features

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: <ul style="list-style-type: none"> • forming a substantial part of a gap between towns; and • the development of which would be likely to result in the loss of visual separation of towns.
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns- being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation.
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.

Purpose D – To Preserve the Setting and Special Character of Historic Towns

A1.8 This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Table EDP A1.3: Purpose D – Illustrative Features

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and to include all of the following features: <ul style="list-style-type: none"> • form part of the setting of the historic town; • make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town.
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):

Contribution	Illustrative Features
	<ul style="list-style-type: none"> • being separated to some extent from historic aspects of the town by existing development or topography; and • containing existing development- not having an important visual, physical, or experiential relationship to historic aspects of the town.
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town- have no visual, physical, or experiential connection to the historic aspects of the town.

ANNEX EDP 1.2: ASSESSMENT OF PURPOSES C

Purpose C - To Assist in Safeguarding the Countryside from Encroachment

A1.9 The matter of 'encroachment' into countryside therefore requires a judgement that considers the key landscape characteristics of the site and its surroundings, as well as the site's visual context:

- The character of the site and the extent to which it is already urbanised, or perceived as such;
- The perception of the site and how strongly it is representative of the character of the wider countryside; and
- The visual characteristics of the site and context and the likely visual impact of the development on the Green Belt.

A1.10 The matter of perceived 'encroachment' requires a judgement that considers:

- Whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it; and
- The degree to which the site has preserved the key characteristics of the wider rural landscape or is severed from it.

A1.11 A site that has limited or no urbanising influences has a stronger role in safeguarding countryside from encroachment. A perception of the site as countryside may already be compromised by some form of development on site or by intervisibility with adjacent development, which will vary with the openness of these views and their extent.

A1.12 Sites that are highly representative of the key landscape characteristics of the wider area, and exhibit them in good condition, make a stronger contribution towards the perception of the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition.

A1.13 The effect of the proposals on the contribution of an area to openness will depend on the characteristics of the area, as set out in the table, as well as on the nature of the proposals including, but not limited to:

- The duration of the development, and its irremediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.” (NPPG para. 013).

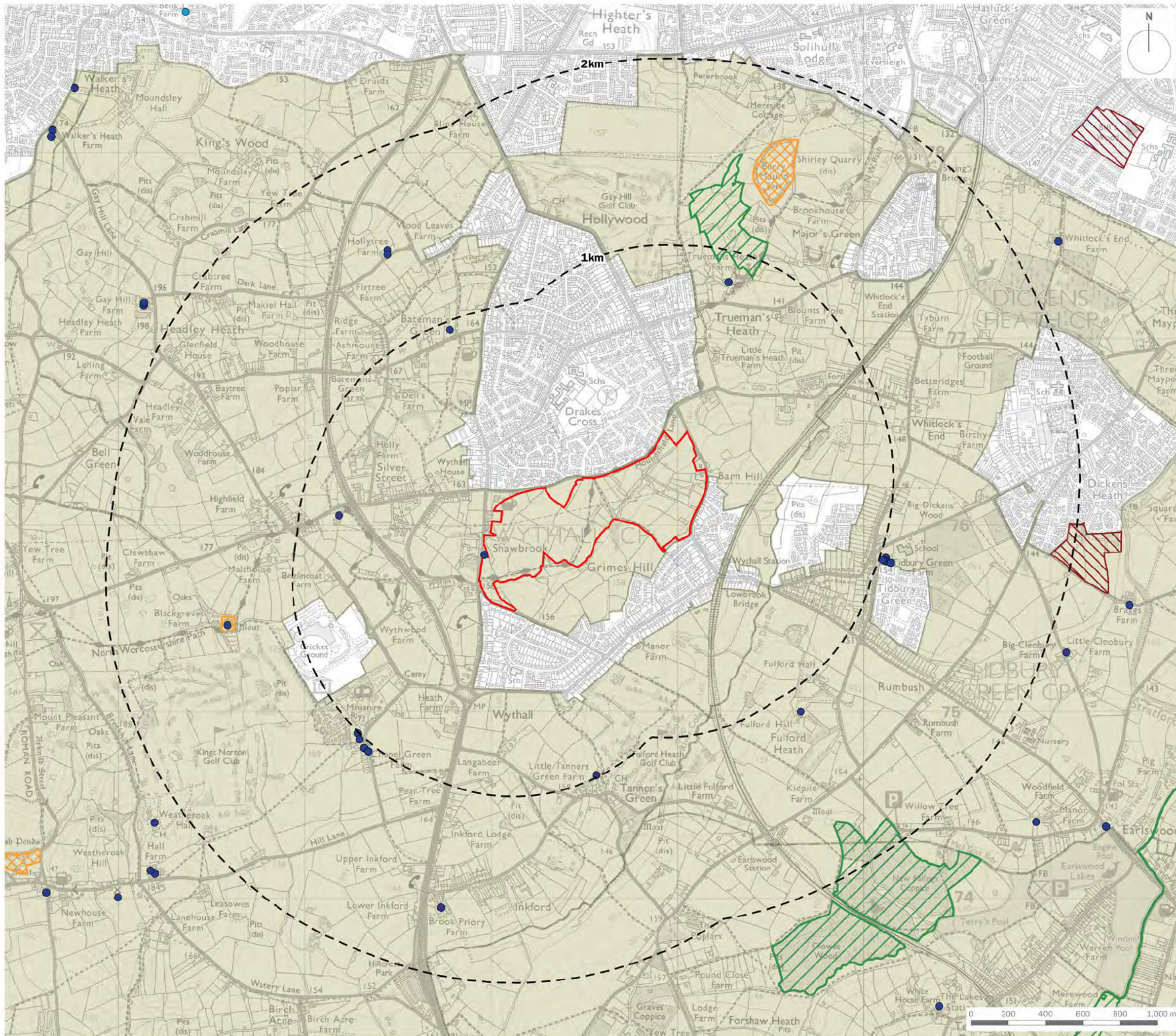
Table EDP A1.4: Purpose C – Illustrative Features

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be those that are perceived as countryside.</p> <p>They are likely to:</p> <ul style="list-style-type: none"> • Be free of existing development and urbanising features within the area or directly influencing it; • Be strongly representative of, and clearly connect with, the wider characteristic rural landscape; • Be visually enclosed such that development on site would be barely apparent beyond the site boundaries; and • Be of limited volume such that it comprises a very limited extent of the Green Belt.
Moderate	<p>Assessment areas that contribute moderately are likely to be free of existing development but be influenced, sensorily and/or perceptually, by adjacent or near large built up area(s)/subject to other urbanising influences.</p> <p>They are also likely to:</p> <ul style="list-style-type: none"> • Show some representative of, and connect with, the wider characteristic rural landscape; • Be visually enclosed to some degree so that development on site would form a minor constituent of the view being partially visible beyond the site boundaries; and • Be of moderate volume as to comprise a limited extent of the Green Belt.
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that are perceived as developed or previously developed land and/or are heavily influenced by urbanising features.</p> <p>They are also likely to:</p> <ul style="list-style-type: none"> • Show little representativeness of, or connect with, the wider characteristic rural landscape; and • Be visually open so that development would form a notable constituent of the view being openly visible beyond the site boundaries. • Be of larger volume as to comprise a larger extent of the Green Belt.

Plans

Plan EDP 1: Landscape Planning Context
(edp3700_d011a 17 October 2025 JGr/JCI)

Plan EDP 2: Zone of Theoretical Visibility
(edp3700_d010a 17 October 2025 PDr/CMY)



- Site Boundary
- Range Rings (at 1km intervals)
- Green Belt
- Ecological Designations**
- Local Nature Reserve (LNR)
- Site of Special Scientific Interest (SSSI)
- Heritage Designations**
- Scheduled Monument
- Grade II* Listed Building
- Grade II Listed Building

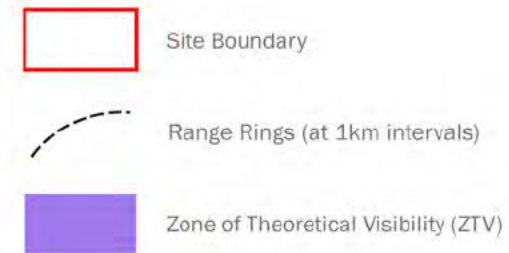
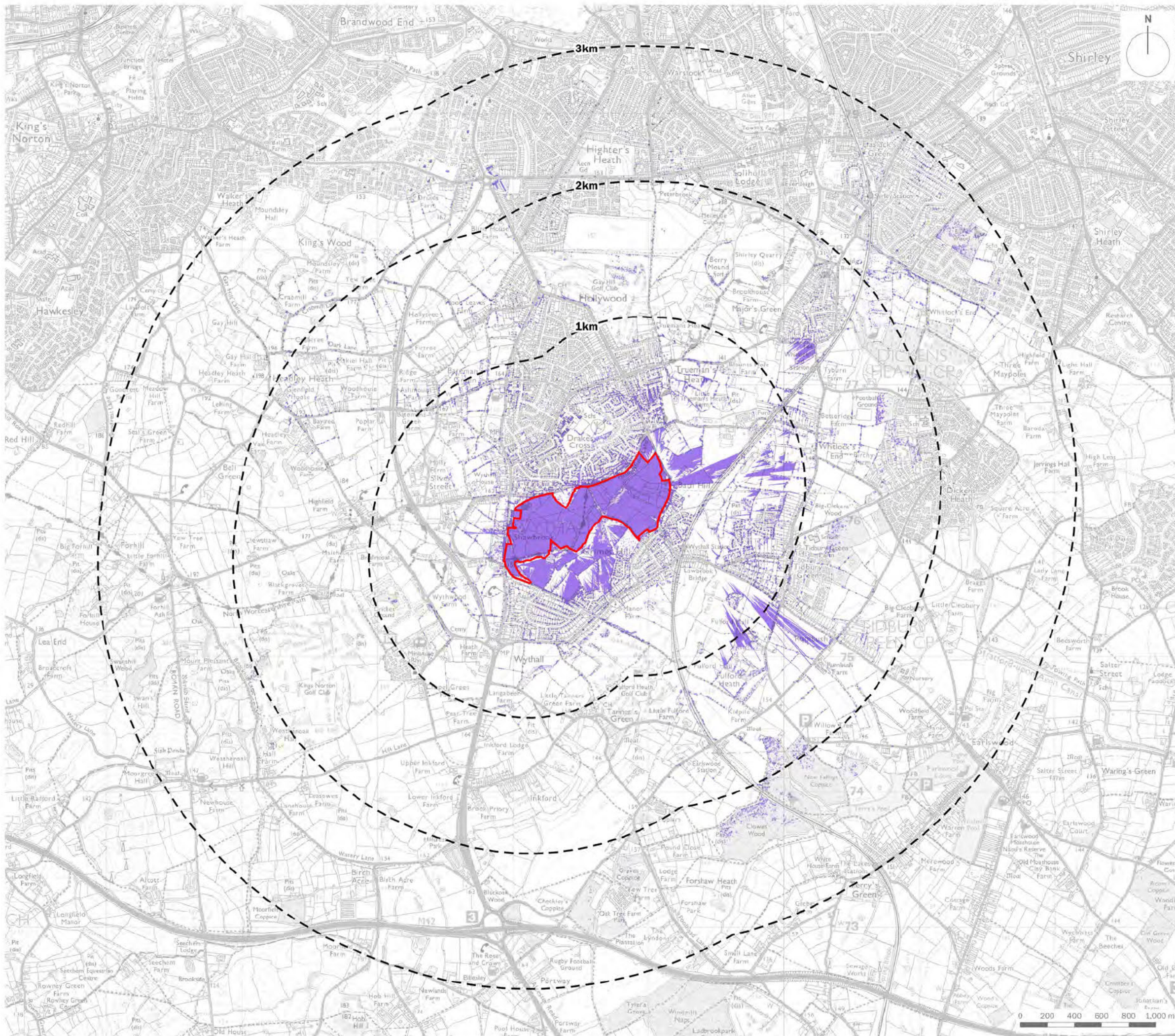
client
Bellway Homes Ltd

project title
Land at Wythall Drakes Cross

drawing title
Landscape Planning Context

date **17 OCTOBER 2025** drawn by **JGr**
drawing number **edp3700_d011a** checked **JCI**
scale **1:20,000 @ A3** QA **RBa**





Zone of Theoretical Visibility (ZTV) was calculated using a spatial modelling algorithm which considers the following parameters:

- 1.6m Receptor Elevation (Observer Height)
- 10m Proposed Development Locations (Ridge Height)
- 360 Degree Field of View
- LiDAR 1m Digital Surface Model (DSM) (vertical accuracy of +/- 5cm)

client	Bellway Homes Ltd	
project title	Land at Wythall Drakes Cross	
drawing title	Zone of Theoretical Visibility	
date	17 OCTOBER 2025	drawn by PDr
drawing number	edp3700_d010a	checked CMY
scale	1:27,500 @ A3	QA RBA





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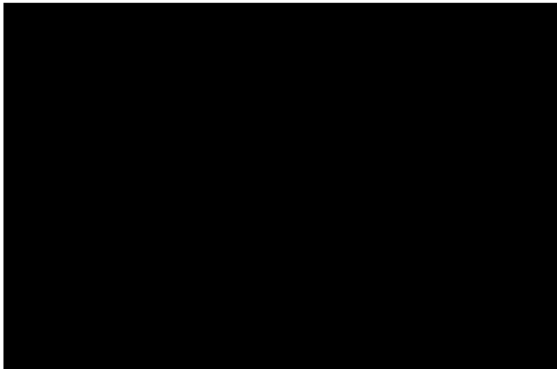
**URBAN
DESIGN
GROUP** REGISTERED PRACTICE



**Landscape
Institute**
Registered practice



10 June 2024



Dear Anne-Louise,

**Response to Proposed Local Green Space Designation – Harmony Wood
Land South of Houndsfield Lane, Wythall**

On behalf of my client, Bellway Strategic Land ('Bellway'), I am writing to you in response to the letter Wythall Parish Council issued (dated 28th April 2024) in relation to the proposed Local Green Space ('LGS') of Harmony Wood (Parish Council Site reference: H), which falls partly within land controlled by Bellway, on land South of Houndsfield Lane, Wythall ('the Site'). The letter from the Parish Council invites Bellway and the landowner's comments in respect of this designation. On behalf of Bellway and the landowners I confirm the proposed designation of Harmony Wood is noted. This letter sets out our comments in relation to this proposed designation.

Policy Position

Harmony Wood, although not designated, is an area of high ecological value with dense areas of trees and therefore is already automatically protected by national policy provisions such as the National Planning Policy Framework ('NPPF') and by the Environment Act 2021.

The NPPF requires decisions to:

- Contribute and enhance the natural and local environment by protecting and enhancing valued landscapes (paragraph 180(a));
- Contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside including trees and woodland (paragraph 180 (b)); and
- Contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity (paragraph 180(d)).

Paragraph 181 of the NPPF also requires plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

Bellway, in accordance with the NPPF, has sought to protect Harmony Wood and it is not proposed to be included within their development parcels. The current Concept Masterplans (option 1 and option 2), submitted in the Design Concept Masterplan Document (2019) (Appendix 1), do not propose development on the woodland and development is focused away from any existing trees and green infrastructure.



The Design Concept Masterplan Document (Appendix 1) states that Bellway's design concept was evolved carefully in response to the landscape setting and acknowledges the existing woodland within and adjacent to the Site boundary. The document (Appendix 1) also emphasises the strong woodland structure within the Site and field boundaries that have created smaller development parcels. Concept Masterplan Option 1 shows two distinctive neighbourhood areas, one to the east and one to the west set within a framework of high quality green space primarily arranged around the wooded watercourse corridor and a central hillside meadow, which form the 'green heart' of the proposal. This landscape-led approach will also be taken at the Reserved Matters application stage to ensure any landscape impacts are minimised.

Furthermore, the Environment Act 2021 is the UK's framework for environmental protection. It requires all planning permissions granted in England to deliver at least 10% biodiversity net gain. Therefore, areas such as Harmony Wood, with high ecological value, are protected by this requirement. Bellway have appointed a range of technical specialists, including a qualified ecologist and a qualified landscape advisor. These professionals are providing advice in respect of landscape and ecology matters to ensure the development proposals accord with national and local policy and guidance.

The Proposed Development

Two potential development options that will provide significant community benefits are currently being proposed for the Site (Appendix 1). Option 1 could provide circa. 875 dwellings with land for a 2 form entry primary school, a convenience shop, a doctor's surgery, 50 space park and ride facility to serve Wythall station commuters as well as extensive green infrastructure, public open space and footpath and cycle connections.

Option 2 is a smaller development option in the eastern part of the Site which could deliver circa 425 dwellings with a 50 space park and ride facility and extensive green infrastructure, public open space and pedestrian / cycle connections. Vehicular access is proposed off Houndsfield Lane and Lea Green Lane for both options and off Alcester Road for Option 1.

Bellway consider that the proposed development could be positive in assisting in the maintenance of the LGS and would assist in opening up the area to the public. It is noted that the LGS assessment provided by the Parish Council confirms the wood (apart from the Public Right of Way 569C ('PRoW') that follows the woodland corridor) is not accessible to the public. The PRoW *'is a popular recreational route to Wythall Station from Hollywood. The remainder of the woodland is not accessible to the public but is a green corridor for wildlife'*. Bellway's development proposals propose to enhance this existing route and could assist in creating further access points into the wood (and designated LGS area) so it can be enjoyed by the public.

It is considered that the proposed development will also assist in enhancing the richness of the wildlife by providing biodiversity enhancements. Bellway is committed to achieving at least 10% Biodiversity Net Gain on their Site and their development will seek to enhance the existing woodland corridor and create further benefits to local wildlife and the public alike. It is also considered that without the proposed development, the investment needed to preserve and enhance Harmony Wood, may not exist and therefore the potential increased public access and enjoyment would not be a possibility.

Should proposed development come forward then Bellway would seek to actively engage with the Parish Council on the use and/or management of the woodland. This could include consideration of how the LGS could be opened up and made more accessible to the public and create greater interaction with this identified valued landscape.



We would welcome further dialogue with the Parish Council regarding proposals for the designation of LGS (reference: H) and proposals for the emerging Neighbourhood Plan.

Yours sincerely



Michael Davies
Savills (UK) Limited
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