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Wythall Submission Version Neighbourhood  
Plan – Regulation 16 Consultation

Representations on behalf of the Church  
Commissioners for England

March 2026

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# 1. Introduction

1.1 Deloitte LLP is instructed by the Church Commissioners for England (hereafter referred to as ‘the Commissioners’) to submit representations to the Regulation 16 consultation for the Wythall Submission Version Neighbourhood Plan 2026 (‘the Draft Plan’) which is the subject of consultation until 26 March 2026.

## Background and Context

1.2 The Wythall Parish was designated as a Neighbourhood Area for the purposes of producing a neighbourhood plan in September 2020. Following this, a Regulation 14 consultation was carried out by Wythall Parish Council on the draft Neighbourhood Plan in December 2024.

1.3 The Commissioners owns land within the Wythall Neighbourhood Plan area which is being promoted jointly with adjacent landowners through the emerging Bromsgrove District Council Local Plan. Land south of Druids Heath can provide approximately 2,000 new homes (including a range of housing types, tenures and sizes to suit the local need), new local facilities including a new mixed-use local centre, school and a comprehensive and well-connected green and blue infrastructure network. The Commissioners is therefore keen to engage positively in the plan-making process and submitted representations to the Regulation 14 consultation on the draft Neighbourhood Plan.

## Representations to Regulation 16 Consultation

1.4 This submission aims to reiterate and elaborate upon critical points previously raised during the Regulation 14 consultation, specifically focusing on the Draft Plan’s adherence to the ‘basic conditions’ and other legal requirements set out in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

1.5 These representations take into consideration the Parish Council’s Basic Conditions Statement and Consultation Statement which sets out their response to previously raised comments. The National Planning Policy Framework (2024) (‘NPPF’) and the adopted Bromsgrove District Plan 2011-2030 (2017) (‘BDP’) are also considered in this assessment. While the BDP is acknowledged to be out of date, the Draft Plan is expected to be in general conformity with the current statutory development plan, and its policies therefore remain a material consideration.

1.6 Furthermore, attention is drawn to the emerging policy direction indicated by the draft NPPF (2025) which, while not yet finalised, represents the Government’s clear expectations for neighbourhood plans and will be a material consideration, particularly given the proposed transitional arrangements for plans not yet submitted.

1.7 It is observed that a number of the concerns articulated in the Commissioners’ earlier representations regarding the Regulation 14 Draft remain largely unaddressed within the latest Regulation 16 iteration, despite the Parish Council’s responses in the Consultation Statement. For a neighbourhood plan to successfully proceed through

examination and to a referendum, it is imperative that it unequivocally demonstrates compliance with these fundamental basic conditions.

## Basic Conditions

1.8 The Draft Plan is legally required to satisfy the following basic conditions:

- **Regard to National Policy and Advice:** The plan must have due regard to national policy and advice, notably the NPPF (both current and emerging). While the emerging NPPF (2025) does not carry the full weight of a finalised policy, it is a material consideration. This is because, as outlined in the Planning Practice Guidance, it reflects the Government's evolving expectations for neighbourhood plans and provides crucial direction to minimise potential conflicts with future development plans and ensure the plan's long-term effectiveness.
- **Contribution to Sustainable Development:** The plan must contribute to the achievement of sustainable development.
- **General Conformity with Strategic Policies:** The plan must be in general conformity with the strategic policies of the adopted BDP.
- **Compliance with Legal Obligations:** The plan must comply with relevant legal obligations, including any applicable EU obligations and human rights legislation.

1.9 The Commissioners considers the Draft Plan unsound as it stands as it does not meet the basic conditions. The Commissioners' detailed assessment of the Draft Plan against the basic conditions and its alignment with the NPPF and BDP is set out in the following sections of these representations.

## 2. Regard to National Policy and Advice

2.1 The Draft Plan's approach to housing supply and Green Belt policy appears to be at odds with the fundamental principles of the NPPF.

### Boosting Housing Supply

2.2 The NPPF places a strong emphasis on significantly boosting the supply of housing (Paragraph 61). While the Foreword of the Draft Plan states that the neighbourhood plan “*strives to safeguard Wythall’s rural heritage while expecting to accommodate a share of new housing development*”, the Draft Plan subsequently adopts a highly restrictive stance, particularly its assertion that “*no assumption can be made that this total [Wythall Housing Needs Assessment proxy housing requirement] will need to be met in Wythall as the only means to do that would be to release land from the Green Belt*” (Draft Plan Paragraph 105). This position, reinforced by the Parish Council's responses to previously raised comments, risks undermining the ability of the wider Bromsgrove District to meet its identified housing needs.

2.3 In the context of both current and future housing requirements, it is critical to note that under the government's revised standard method (introduced in December 2024), Bromsgrove's local housing need has significantly increased to approximately 715 new dwellings per annum (dpa), compared to approximately 383 dpa under the old standard method. This substantial increase exacerbates the existing district-wide housing shortfall.

2.4 A neighbourhood plan should proactively contribute to housing delivery, not constrain it, especially when there is a recognised district-wide housing shortfall.

2.5 This restrictive approach is further challenged by the current NPPF and emerging policy direction in the draft NPPF (2025). The current and emerging NPPFs state that neighbourhood plans should not propose less development than what is already set out in the wider development plan. Moreover, NPPF (2025) Draft Policy HO2 makes clear that local authorities should “*avoid setting a housing requirement of nil, except in specified conditions*”. The Wythall Neighbourhood Plan is being prepared to ensure conformity with strategic policies and, as far as possible, the emerging local plan; however, the Draft Plan's effective rejection of housing provision through Green Belt release, without robust justification, appears to directly contravene these clear expectations for positive plan-making and housing delivery and therefore does not conform with national and local strategic policies.

### Green Belt Flexibility

2.6 While Green Belt protection is important, the current NPPF acknowledges that Green Belt boundaries may need to be reviewed through the Local Plan process in exceptional circumstances to meet strategic housing requirements (Paragraph 144).

The Draft Plan's categorical rejection of any Green Belt release in Wythall appears to pre-empt and potentially conflict with the strategic decisions of the ongoing Bromsgrove Local Plan Review, which is exploring options for Green Belt adjustment to address housing needs, especially given the significant increase in housing need identified through the revised standard method. The Draft Plan should be flexible enough to accommodate strategic allocations that may emerge from the Local Plan Review, rather than creating an inflexible barrier, particularly as the Council is unable to demonstrate a five-year housing land supply or meet the Housing Delivery Test<sup>1</sup>. Draft Plan Paragraph 105 and any related policies should be amended to reflect this necessary flexibility.

## Sustainable Development Balance

2.7 The Draft Plan's emphasis on environmental protection, must be balanced with the economic and social dimensions of sustainable development (NPPF Paragraphs 7-12). An overly restrictive approach to housing can stifle growth, limit housing choices, and exacerbate affordability issues, thereby hindering the holistic achievement of sustainable development as advocated by the NPPF.

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<sup>1</sup> Bromsgrove District Council (April 2025) *Housing Land Supply in Bromsgrove District 2011 – 2025*  
[https://www.bromsgrove.gov.uk/media/vm5bzcvo/bdc\\_housinglandsupplyreport2011-2025\\_web.pdf](https://www.bromsgrove.gov.uk/media/vm5bzcvo/bdc_housinglandsupplyreport2011-2025_web.pdf)

# 3. Contribution to Sustainable Development

3.1 The Draft Plan's stated objectives for sustainable development are not consistently supported by its policies, particularly concerning housing and infrastructure.

## Housing Affordability and Mix

3.2 Despite acknowledging local housing needs and affordability challenges in Paragraphs 101-102, the Draft Plan lacks clear, proactive mechanisms to facilitate the delivery of affordable housing and a diverse mix of housing types. Draft Plan policies WYTHALL 2 'Affordable Housing Tenure' and WYTHALL 3 'Housing Types and Sizes', while setting out aspirations, do not provide sufficient detail or proactive measures to ensure delivery, particularly given high market values. The Parish Council's responses to previous comments suggest a reactive approach to housing delivery, which is unlikely to address the significant local affordability gap effectively. A truly sustainable plan would actively seek to provide a range of housing options to meet the needs of all segments of the community. These policies should be amended to include more robust and deliverable mechanisms for achieving their stated aims.

## Infrastructure Provision

3.3 The Draft Plan identifies various community infrastructure needs in Table 3 but provides insufficient detail on how these will be funded and delivered, especially in conjunction with any new development. Draft Plan Policy WYTHALL 1 (Local Community Facilities), which seeks to protect existing facilities, needs to be strengthened with clear mechanisms for the provision and funding of new or enhanced infrastructure to support growth. The absence of clear plans for funding and delivery partners for essential services and transport improvements raises concerns about the plan's ability to ensure that growth is genuinely sustainable and supported by adequate infrastructure.

# 4. General Conformity with the Strategic Policies of the Local Plan

4.1 A critical basic condition is that the Draft Plan must be in general conformity with the strategic policies of the adopted BDP (2017). This assessment reveals significant areas of non-conformity.

## Strategic Housing Targets and Green Belt Review (BDP3 & BDP4)

4.2 The BDP (2017) sets a clear strategic housing target for the District and explicitly identifies the need for a Green Belt Review to be undertaken to identify land for future housing needs beyond 2023 (Policy BDP3, paragraph 8.11 and Policy BDP5, paragraph 8.19).

4.3 The Draft Plan's outright rejection in Paragraph 105 of Green Belt release in Wythall directly contradicts this strategic approach. The BDP's (2017) policies are designed to ensure the District meets its housing needs, and a neighbourhood plan cannot unilaterally undermine this strategic intent. The Parish Council's focus on conformity with currently adopted policies overlooks the dynamic and forward-looking nature of the BDP, which explicitly plans for Green Belt review. The Draft Plan's overall approach to housing and Green Belt should be amended to achieve general conformity with BDP policies BDP3 and BDP4.

## Wythall's Role in Settlement Hierarchy (BDP2)

4.4 The BDP classifies Wythall as a "Large Settlement" in Policy BDP2, paragraph 8.6, implying an expectation for it to accommodate some level of growth. The Draft Plan's restrictive housing policies appear to limit this role, potentially creating a conflict with the BDP's overall settlement strategy. The Draft Plan should be amended to reflect Wythall's strategic role within the District's settlement hierarchy.

## Infrastructure Contributions (BDP6)

4.5 The BDP mandates coordinated infrastructure provision to support growth in Policy BDP6. The Draft Plan's lack of detailed funding and delivery mechanisms for infrastructure improvements, as previously noted, falls short of the BDP's strategic requirements. Draft Plan Policy WYTHALL 1 and related sections should be amended to clearly articulate how new development will contribute to strategic infrastructure provision in line with BDP6.

# 5. Conclusion

- 5.1 The Church Commissioners for England maintains that the Wythall Neighbourhood Plan, in its current form, presents significant challenges to its compliance with the basic conditions, particularly regarding its alignment with national policy and the strategic objectives of the Bromsgrove District Plan.
- 5.2 The Draft Plan's restrictive approach to housing supply and Green Belt policy directly conflicts with the NPPF's imperative to boost housing and the BDP's strategic plans for Green Belt review and housing delivery.
- 5.3 The Draft Plan lacks credible and proactive mechanisms for delivering affordable housing and ensuring adequate infrastructure to support any future growth.
- 5.4 The Draft Plan's claims of general conformity with the Local Plan are undermined by its divergence from the BDP's strategic housing and Green Belt policies.
- 5.5 The Draft Plan must be revised to acknowledge and align with the strategic housing targets and Green Belt review policies of the Bromsgrove District Plan. This requires a more flexible approach to housing provision within Wythall, recognising its role within the wider District.
- 5.6 The Draft Plan should incorporate more robust and detailed policies for the proactive delivery of diverse housing types, including affordable homes, and provide clear mechanisms for funding and delivering necessary infrastructure improvements.
- 5.7 The Draft Plan should include a commitment to adapt its policies in response to the outcomes of the ongoing Bromsgrove Local Plan Review, particularly concerning housing allocations and Green Belt boundaries, to ensure enduring conformity with the strategic planning framework.
- 5.8 A neighbourhood plan must be a positive tool for guiding sustainable development, and its policies must be demonstrably sound and in conformity with the strategic planning framework. Addressing these concerns is crucial for the Draft Plan to be found legally compliant and effective in guiding the future development of Wythall Parish.



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