



WYTHALL NEIGHBOURHOOD PLAN – SUMMARY OF REGULATION 16 REPRESENTATIONS

<u>REPRESENTATION</u>	<u>SECTION / POLICY / PARAGRAPH / TABLE / FIGURE</u>	<u>COMMENT (SUMMARISED OR EXTRACT)</u>
WNP01 – Network Rail	General	<p>General comments regarding Network Rail's:</p> <ul style="list-style-type: none">- Role on planning applications within 10 metres of railway land and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway.- Its responsibility for maintaining and operating the railway infrastructure and associated estate and protection from proposed development.- Advice note to LPAs and developers about development relating to the protection of Network Rail's assets.- Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development / employment areas within the neighbourhood area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.

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		<ul style="list-style-type: none"> - Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon any level crossings with mitigation implemented as required.
WNP02 – Tompkins-Coll	Paragraph 195	<p>Whitlocks End Train Station gets a mention, but throughout the plan the focus is on Wythall train station, even though if we had a pedestrian crossing we could easily access Whitlocks by walking.</p> <p>Whilst recognising that Whitlocks is out of the area, it is a major asset to those in Majors Green who (as the report clearly identifies only have the pub, wake Green Football ground (I thought this was solihull) and a postbox in Peterbrook Road!</p> <p>We need a pedestrian Cross from the corner of Haslucks Green /Tilehouse Lane to access the train station.</p> <p>The traffic has increased at an inordinate rate and it is no longer possible to cross safely and easily to access it. We were told there would be an island possibly coming from the junction of tythe barn Lane, but this wouldn't help Majors Green residents get to the only pavement that approaches Whitlocks train station as it is beyond the train station.</p> <p>We need help. With all the housing development plans, it will only get more dangerous.</p>
	Wythall 10	<p>Regarding the development of Wythall Station, I note there is mention of a transport hub. Forgive my cynicism, but when there were consultations to expand the parking at Whitlocks End Train Station we were promised the same thing. Instead, we lost fields, replaced by tarmac, increased traffic commuting through Majors Green and the 'hub' never materialised.</p> <p>Unless there is a joined up transportation policy, and improvement in the bus service provision, these are empty promises.</p>

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	Paragraph 217	Paragraph 217 acknowledges the lack of facilities in Majors Green (although the Drawbridge and Wake Green Football Club get a mention, as does the postbox on Peterbrook Road!). We could do with CPR equipment and stab vest locations.
	Table 4	The report mentions 'sense of arrival in Majors Green'. Can we have the basics in place first please - a footpath as you arrive into Majors Green along Peterbrook Road please? There is currently no footpath on either side of the road, no road drainage provision and no lightening on a particularly dangerous corner. Solihull Council have closed Aqueduct Road and have routed traffic through Majors Green increasing this risk for pedestrians trying to walk this route to access amongst other places, the North Worcestershire walk.
	Paragraph 226	It would be great if you could enable access to the North Worcestershire walk via the Central Egg Agency (access road opposite Rolan Drive) as this access is currently is blocked off. This would be a welcome recreational addition to our Majors Green facilities if this could be enabled.
	Figure 21	It is not clear who or what the Potential Parking Area 2 at Peterbrook Road is for (looks to be the other side to Aqueduct Road and heading up towards the fishing pools), although it gets a mention in the cycling section. We need a basic footpath before we need more parking?
WNP03 – Tompkins	Section 1, Paragraph 131 and Section 7	Drawbridge , Drawbridge Road – there has been an operating Drawbridge on this canal for over 200 years – this should be included in the historical records and in the introduction to the Parish (section 1 and paragraph 131 and section 7). It is an asset of the Canals and Rivers Trust who operate it.
	Section 1 and Section 7	Stratford on Avon Canal should be mentioned as part of the Majors Green prominent features – it is a recreational amenity, accessible to residents from the Drawbridge and Rushleigh Road accesses, coupled

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		with the walk to Dickens Heath it is an area asset, under the control of the Canals and Rivers Trust – needs including in Section 1 and Section 7.
	Paragraph 131 and Section 7	Other prominent features that need to be mentioned in respect of Majors Green is the River Cole Tributary running through it – it is a frequent source of flooding and impacts the landscape – with peaks affecting Truemans Heath Road and Peterbrook Road. The flood junction on Peterbrook Road and Aqueduct Road appears on maps for over 200 years and should also be included in the historical listings.
	Section 1	North East Worcestershire walk – needs including in section 1 as an asset, with improved access.
	Paragraphs 70 and 195	Whitlocks End Train Station gets a mention – but throughout the plan, the focus is on Wythall train station, even though if we had a pedestrian crossing for easy access from the junction of Haslucks Green Road / Tilehouse lane, this is the nearest train station for Majors Green Residents. The inclusion of a pedestrian crossing would be welcomed as the traffic is increasing and it is dangerous to attempt to cross to access the facility. With only one footpath, work needs to be done to make this a safe an accessible public transport without having to drive to it. To make the asset outside our area, but nearer than our “local Wythall station”, should be made safely accessible by provision of safe crossing to use the pavements to give us access, regardless of whether it is in the Area or not given its proximity.
	Figure 2	Figure 2 – flower planting – Majors Green missed out on the wild seeds (the Council mowed over them). We have lots of grass verges that are suitable for bulb planting – please ensure we are included next time – same with any bug or bee hotel creation – it’s not just children that like to make those for the environment – please don’t limit future events to children – but open to residents.
	Figure 2	Figure 2 fly tipping and litter – there has been a noticeable increase with the amount of cars passing through Majors Green. Not sure what the answer is – but a camera would be most welcome – I’d be happy to site it!

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	Paragraph 78	Majors Green welcomes the statement Wythall Parish will remain a distinctive local community. With the number of planning applications submitted from Solihull, Birmingham and Bromsgrove, Majors Green feels under threat of losing it's rural identity and becoming a rat run to large developments without the infrastructure in place to support it. Already a single pothole has been repaired 4 times in the last 3 weeks due to abundance of car traffic on what was a rural road.
	Table 3	Easier access for Majors Green Residents to the North East Worcestershire Way. There is no safe way for residents to access the route from Peterbrook Road as there are no pavements or lighting from the Drawbridge Road to walk up to it. Access from the road way opposite Rolan Way would be ideal, but has been prevented by a metal gate – opening this for pedestrian access would be a big improvement.
	Paragraph 131 and Section 8	There are 2 fields – one adjacent to Haslucks Green to Peterbrook Road and the other adjacent to Peterbrook Road that were the subject of Property Spy scam. These should be included in the list of “green spaces” as they demark the perimeter of Majors Green. They are critical bio habitats housing Deer, Bats and Owls. They need adding and could be used to enhance the habitat opportunities. They align against the River Cole tributary and provide a river corridor movement for animals. As the tributary runs through both of these fields, they are both prone to flooding and should be protected. There are Article 4 placed on this land on Haslucks, meaning no building, fencing or anything that can be used to mark out the land. There is also significant Severn Trent water infrastructure with major 28 inch pipes responsible for feeding the region underneath that field. This site should become designated an SSSI/wildlife site/local green space with improved access.
	Whole plan	No mention made of the landfill off Peterbrook Road, Majors Green and the reed filtration system purifying the tributary of the Cole.

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	Section 7	There is a bottle pit with Cole from Birmingham urbanisation off Peterbrook Road? Should this get mentioned?
	Whole plan	Majors Green “Island” Majors Green can be cut off in times of flooding as with only 4 access points – Bills Lane; Peterbrook Road; Truemans Heath and Tile House Lane all being prone to flooding – this danger needs to be included in the report as it is becoming more of a crucial transport link and would have severe impacts when the roads are closed (as frequently happen).
	Table 5	H5 and H6 Pavements & lightening – the area is in desperate need of a footpath creation from Peterbrook Road – to join with the Drawbridge. There is no pavement and therefore no safe access for pedestrians wishing to walk to Solihull Lodge. There is a nasty corner with no pavement, lighting or road drainage. A mud pavement was marked out when the land next to the canal was recently put up for sale – if shingle could be added – that would be a great improvement, but the infrastructure in Majors Green really needs addressing as people walk along the single footpath having to wear head torches at night as the lighten is so low level. We were told that it was to maintain the village feel, but when Solihull are siting Peterbrook Road as an Urban road capable of easily coping with the re-routed close Aqueduct Road traffic – the infrastructure needs upgrading to give at least one walkable pavement as a minimum.
WNP04 – Coal Authority	General	The area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.
WNP05 – Historic England	General	We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage and a weblink to Historic England’s advice on successfully incorporating historic environment considerations into a neighbourhood plan.

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WNP06 – Wells	Audit of Community Facilities and Infrastructure (July 2024) and Paragraph 96	Site reference 74 (Hollywood Dental Practice, 279 Alcester Road, Hollywood B47 5HJ) no longer operates as a dental practice.
WNP07 – Environment Agency	General	We previously provided comments at the SEA and HRA Screening Opinion stage and referred you to the pro forma guidance. On the basis that the current submission is similar and proposes no sites in Flood Zone 2 or 3 we would have no further comments to offer at this time.
WNP08 – Bournheath Parish Council	General	<p>Bournheath Parish appreciates the work undertaken by Wythall Parish Council and considers that they have put together a very constructive Neighbourhood Plan.</p> <p>We wonder whether more emphasis should be placed on education provision as we understand that the current schools within the Wythall area are over-subscribed and that some students have to travel unacceptable distances to other schools. Alerting developers that they would need to invest in education as well as other services such as GPs might be helpful.</p>
WNP09 – National Highways	General	<p>The SRN closest to the NDP area is the M42 junction 3 motorway, which is outside the boundary of the plan area.</p> <p>We have considered the contents of the Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact the safety and operation of the SRN, we have no other comments to make.</p>

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WNP10 – Natural England	General	Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.
WNP11 – Nexus Planning on behalf of Lone Star Land	General	<p>Lone Star is promoting this land through the Bromsgrove Local Plan Review and intends to submit outline planning applications for residential-led development.</p> <p>The representation includes comments on the progress of the emerging Bromsgrove District Local Plan; the District’s housing need; and the NPPF’s approach to Green Belt release, grey belt and sustainable growth. The representation considers that Wythall, and specifically the sites promoted within the representation, represent a highly sustainable location for growth. The representation sets out how the emerging masterplan can effectively be delivered in line with the objectives of the Neighbourhood Plan (set out on page 19 of the Neighbourhood Plan).</p>
	Wythall 1	<p>This policy comprises two distinct elements. The first seeks to resist development proposals that would result in the loss of existing community facilities, as identified in the Audit of Facilities. Lone Star raises no objection to this aspect of the policy.</p> <p>The second part of the policy sets out a range of infrastructure requirements that development proposals should deliver or contribute towards, where appropriate. The representation sets out what infrastructure the development could potential contribute to or directly deliver based on the requirements identified within Wythall 1.</p> <p>Notwithstanding this, Lone Star considers it necessary for the policy to be amended to ensure consistency with national policy and planning law. In particular, it should be made explicit that any developer contributions must be proportionate and compliant with the statutory tests set out in the Community Infrastructure Levy Regulations.</p>

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	Wythall 2	<p>Whilst it is anticipated that the requirements of Policy WYTHALL 2 could be met, it is premature to confirm the precise affordable housing tenure mix in the absence of clarity regarding viability and the relative prioritisation of competing development obligations.</p> <p>The inclusion of a cascade mechanism for local connection is supported, reflecting a well-established approach on comparable strategic schemes.</p> <p>Overall, it is essential that affordable housing provision is considered alongside viability and infrastructure requirements. Accordingly, the policy should incorporate appropriate flexibility to ensure that delivery remains viable and that wider planning objectives can be achieved.</p>
	Wythall 3	The representation identifies how the development proposed by Lone Star would comply with Wythall 3.
	Wythall 4	<p>The design code set out in Table 5 provides a useful starting point for the preparation of a high-quality masterplan. Benchmarking against existing densities offers helpful context; however, it should be recognised that the aspiration to deliver a greater proportion of two-bedroom market housing and apartment development will inevitably result in higher net densities than those typically found within the existing housing stock, which is predominantly family housing.</p> <p>Accordingly, Lone Star considers that density expectations should be applied flexibly and reflect modern development patterns, as well as wider sustainability objectives, particularly in accessible locations.</p>
	Wythall 5	All new dwellings delivered on land within Lone Star’s control will be constructed in accordance with the Future Homes Standard.
	Wythall 6	Lone Star have no comment on the list.
	Wythall 7	The proposals promoted by Lone Star do not impact any of the identified Local Green Space designations.

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		Reference is made to the masterplan which incorporates areas of new open space.
	Wythall 8	Lone Star’s proposals will deliver the mandatory minimum 10% Biodiversity Net Gain.
	Wythall 9	<p>The location of Lone Star’s proposals, together with the proposed connections to Wythall Station and Station Road, will enable future residents to readily access the existing A4 bus service operating along Station Road.</p> <p>The increased residential population generated by the development would provide additional patronage, supporting the ongoing viability of the service. As part of the detailed planning application process, engagement with the relevant bus operators would be undertaken to explore opportunities to enhance the service, forming part of a comprehensive transport strategy that would also include improvements to Wythall Station.</p>
	Wythall 10	A key strategic benefit of the Lone Star proposals is the opportunity to deliver enhancements to Wythall Station, including additional parking provision and the creation of a mobility hub to improve accessibility and passenger facilities.
	Wythall 11	<p>Lone Star’s proposals fully integrate the LGW1 route within the wider context plan, incorporating it through the proposed River Cole Country Park and continuing through the development within a dedicated green corridor.</p> <p>In addition, off-site improvements are proposed to deliver a cycleway along Station Road, facilitating the implementation of route YC5. Further enhancements to route YC4 are also proposed as part of a wider strategy to improve connectivity and access to the 8 Hills Regional Park and the North Worcestershire Way.</p>

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WNP12 – Deloitte LLP on behalf of the Church Commissioners for England	General	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.
	General – Boosting housing supply (National Policy and Advice) and Paragraph 105	<p>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.</p> <p>The representation sets out Bromsgrove District’s local housing need and notes that the increase in local housing need derived from the revised standard method introduced in December 2024 exacerbates the existing district-wide housing shortfall.</p> <p>A neighbourhood plan should proactively contribute to housing delivery, not constrain it, especially when there is a recognised district-wide housing shortfall.</p> <p>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</p>

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		contravene these clear expectations for positive plan-making and housing delivery and therefore does not conform with national and local strategic policies.
	General – Green Belt (National Policy and Advice) and Paragraph 105	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. Draft Plan Paragraph 105 and any related policies should be amended to reflect this necessary flexibility.
	General – Sustainable Development Balance (National Policy and Advice)	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.
	Wythall 2 and Wythall 3	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

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		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.
	Wythall 1 and Table 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.
	General – Strategic Housing Targets and Green Belt Review (BDP3 & BDP4) (General Conformity with the Strategic Policies of the Local Plan) and Paragraph 105	<p>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).</p> <p>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.</p>
	General – Wythall's Role in Settlement Hierarchy	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

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	(BDP2) (General Conformity with the Strategic Policies of the Local Plan)	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.
	General – Infrastructure Contributions (BDP6) (General Conformity with the Strategic Policies of the Local Plan) and Wythall 1	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.
WNP13 – Harris Lamb on behalf of Taylor Wimpey (Silver Street)	General	Taylor Wimpey are promoting land at Silver Street, Wythall for residential development through the emerging Bromsgrove Local Plan as well as currently preparing a planning application for the site.
	General, Paragraphs 54, 55 and 78	The adopted development plan for Bromsgrove is out of date with regard to its housing land supply. Therefore, the NP as drafted proposes a plan period running until 2040, which was planned to coincide with the original date for the emerging Bromsgrove District Local Plan. The emerging Local Plan Period has now been extended to 2043. Notwithstanding this, the emerging Local Plan is still at an early stage of preparation. The District Council consulted on a “Draft Development Strategy” in June 2025. This document proposes 6 broad distributions strategies for growth. Therefore, there is no certainty which strategy will be followed at this time.

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		<p>Accordingly, with development strategies still to be determined, it is very difficult for the NP to be prepared and be in general conformity with the strategic policies of the Development Plan as these aren't known yet. This is accepted by the Neighbourhood Plan which states [quoted parts of paragraphs 104 and 105 of the Neighbourhood Plan].</p> <p>The Neighbourhood Plan cannot be in conformity with Basic Condition e), because the strategic policies are not yet known.</p>
	General and Paragraph 18	<p>The emerging NP is based on Bromsgrove's Green Belt Purposes Assessment (Aug 2019) and is therefore out of date. As such the draft Plan does not meet basic condition a). Whilst the basic condition only requires a NP to 'have regard' to national policies and advice it is considered Paragraph 32 of the Framework is important when reviewing plans, and it is our view that 'no regard' has been had, especially when it is considered that Bromsgrove's latest Green Belt Study (June 2022) is not referred to despite it being nearly four years old.</p> <p>Whilst it is considered that the NP does not meet the basic conditions as set out above, there are elements of the NP which acknowledge, or allude to, Green Belt release being necessary, notably paragraph 99.</p> <p>This acceptance is welcome, however, it would be better to use this starting point to plan meaningfully for such release once Bromsgrove's strategic policies are known. In doing so, it would avoid criticism of the Plan being premature, and not in line with up-to-date evidence as required by National Policy.</p>
	General	The representation includes commentary on Taylor Wimpey's land promotion to the south of Silver Street/west of Alcester Road and proposes that it should be allocated for development for around 125 dwellings in both the Neighbourhood Plan and the emerging Bromsgrove District Local Plan.
	General	As it stands, it is considered the NP is premature in respect of the District Council's Local Plan.

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		In order to address these concerns, we would suggest that the NP should be paused and not progress to Examination until such time as the Bromsgrove Local Plan has progressed further and the development needs of the District are established. At that point, the NP could be prepared having full regard to the strategic policies of the district and to make appropriate provision within it.
WNP14 – Harris Lamb on behalf of Taylor Wimpey (Alcester Road)	General	Taylor Wimpey are promoting land at Alcester Road, Wythall for residential development through the emerging Bromsgrove Local Plan as well as currently having a live planning application for the site being considered.
	General, Paragraphs 54, 55 and 78	<p>The adopted development plan for Bromsgrove is out of date with regard to its housing land supply. Therefore, the NP as drafted proposes a plan period running until 2040, which was planned to coincide with the original date for the emerging Bromsgrove District Local Plan. The emerging Local Plan Period has now been extended to 2043. Notwithstanding this, the emerging Local Plan is still at an early stage of preparation. The District Council consulted on a “Draft Development Strategy” in June 2025. This document proposes 6 broad distributions strategies for growth. Therefore, there is no certainty which strategy will be followed at this time.</p> <p>Accordingly, with development strategies still to be determined, it is very difficult for the NP to be prepared and be in general conformity with the strategic policies of the Development Plan as these aren’t known yet. This is accepted by the Neighbourhood Plan which states [quoted parts of paragraphs 104 and 105 of the Neighbourhood Plan].</p> <p>The Neighbourhood Plan cannot be in conformity with Basic Condition e), because the strategic policies are not yet known.</p>
	General and Paragraph 18	The emerging NP is based on Bromsgrove’s Green Belt Purposes Assessment (Aug 2019) and is therefore out of date. As such the draft Plan does not meet basic condition a). Whilst the basic condition only requires a NP to ‘have regard’ to national policies and advice it is considered Paragraph 32 of the

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		<p>Framework is important when reviewing plans, and it is our view that ‘no regard’ has been had, especially when it is considered that Bromsgrove’s latest Green Belt Study (June 2022) is not referred to despite it being nearly four years old.</p> <p>Whilst it is considered that the NP does not meet the basic conditions as set out above, there are elements of the NP which acknowledge, or allude to, Green Belt release being necessary, notably paragraph 99.</p> <p>This acceptance is welcome, however, it would be better to use this starting point to plan meaningfully for such release once Bromsgrove’s strategic polices are known. In doing so, it would avoid criticism of the Plan being premature, and not in line with up-to-date evidence as required by National Policy.</p>
	General	The representation includes commentary on Taylor Wimpey’s land promotion to the west of Alcester Road and proposes that it should be allocated for development for up to 110 dwellings in both the Neighbourhood Plan and the emerging Bromsgrove District Local Plan.
	General	<p>As it stands, it is considered the NP is premature in respect of the District Council’s Local Plan.</p> <p>In order to address these concerns, we would suggest that the NP should be paused and not progress to Examination until such time as the Bromsgrove Local Plan has progressed further and the development needs of the District are established. At that point, the NP could be prepared having full regard to the strategic policies of the district and to make appropriate provision within it.</p>
WNP15 – Savills on behalf of Bellway Strategic Land	General	Bellway is promoting land South of Houndsfield Lane (circa 45.04 hectares) for residential development. Details of the proposed development has been provided, Additionally, a Site Plan, Benefits Plan, Green Belt Appraisal and a letter to Wythall Parish Council in response to the proposed local green space designation of Harmony Wood has been provided.

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		<p>Commentary on the Draft Development Strategy consultation held by the District Council; preparation of a planning application; and public consultation events held relating to the site are noted.</p>
	Paragraph 3	<p>Bellway previously objected to the reference of Wythall as “being <u>rural</u> in character” [Savills Emphasis] at paragraph 3 of the Regulation 14 consultation document. This wording has subsequently been amended to “Wythall has a <u>rural heritage</u>” [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.</p>
	Paragraph 18	<p>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”.</p> <p>The 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) 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</p>

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		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	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 has been demonstrated in the table in the representation and was also set out in the Regulation 14 consultation response.
	Section 3	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.
	Figure 3	<p>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.</p> <p>Weaknesses identified in Figure 3 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.</p> <p>As set out previously, Bellway also consider that the identified opportunities in Figure 3 (page 18) can also be achieved by new development. The representation lists four of the opportunities and one threat</p>

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		identified and Savills' response on how Bellway's proposed development could help achieve these opportunities and threat.
	Vision	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).
	Objectives	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 and Table 3	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	As set out in the representations submitted to the Regulation 14 consultation, Bellway support policy Wythall 1. The policy states ' <u>where appropriate</u> , 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

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		<p>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.</p> <p>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) of the PPG.</p>
	Section 5	<p>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 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.</p>
	Wythall 2	<p>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.</p> <p>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 <u>should</u> form around 30% of affordable housing provision in Wythall Parish, <u>including a maximum 5%</u> 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</p>

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		<p>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’.</p> <p>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) (contributing to the achievement of sustainable development).</p>
	Wythall 3	<p>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 <u>different sites might meet specific local housing needs or a broad range of local and strategic housing needs with each considered on their merits</u>” [Savills Emphasis]. This amendment ensures that this specific policy is in line with paragraph 16 b) of the NPPF which states ‘plans should be prepared positively, in a way that is aspirational but deliverable’ and also in accordance with basic conditions a) and d) in the PPG.</p>
	Wythall 4 – Table 4	<p>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.</p>
	Wythall 4 – Table 5	<p>The representation includes commentary on how Bellway consider their site complies with some of the design codes set out in Table 5.</p>
	Wythall 5	<p>Bellway note policy Wythall 5 as written. The policy states ‘new development design in Wythall Parish should be future-proofed to <u>support the achievement of the Future Homes Standard</u>’ [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 launched Bellway launched a dedicated testing facility,</p>

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		<p>‘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.</p> <p>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.</p>
	Wythall 7	<p>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).</p> <p>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.</p> <p>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</p>

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		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	<p>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 <u>on the application site</u> and where this cannot be achieved, <u>proposals should aim</u> 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 Gain advises that 10% BNG can be achieved in 3 ways:</p> <ol style="list-style-type: none"> 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. <p>Developers can combine all 3 options, but must follow the steps in order. This order of steps is called the biodiversity gain hierarchy”</p> <p>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.</p>

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	Wythall 9	<p>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 “<u>If there is sufficient local demand</u> 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”.</p>
	Wythall 10	<p>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.</p> <p>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”.</p> <p>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</p>

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		<p>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.</p>
	Wythall 11	<p>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) of the PPG.</p> <p>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.</p>
WNP16 – Worcestershire County Council	Paragraph 64, Section 7 and Wythall 6	<p>The draft plan clearly sets out to protect non-designated heritage assets within this predominately rural parish with 'Maintaining and protecting local identity and assets' a key policy theme. We commend the steering groups consultation with the County Historic Environment Record and the development of the Wythall Parish List of Local Heritage Assets which identifies 20 non-designated heritage assets that they would like recognised and protected due to the important contribution they make to the distinctive local character of the parish. We would recommend that the plan, however, should make clear that inclusion on the list is not necessary for the application of wider heritage policy.</p>
	Figure 20 and Table 9	<p>We note that the Figure 20 and Table 9 of the Wythall Neighbourhood plan regulation 15 submission discuss active travel improvements. As part of these, the following routes are suggested as cycle routes but</p>

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		<p>in part run over existing public footpaths recorded on the Definitive Map and Statement for Worcestershire.</p> <ul style="list-style-type: none"> • RC3 • BC4 • LGW3 <p>It should be noted that the footpaths on these routes currently only have legal rights for walkers. If the route is going to be changed in status, a legal order would be needed to dedicate higher rights. This would require landowner consent and signup.</p> <p>In addition, before any changes were made to existing public rights of way, the public rights of way team should be consulted. This includes surfacing/changes to width or furniture on the routes.</p>
WNP17 – Stantec on behalf of IM Land	General	IM Land is working with the landowners to promote and bring forward a residential led development at Land at Packhorse Lane, Hollywood. The representation includes commentary on IM Land’s proposed development of the site.
	General – Green Belt and grey belt	<p>The representation makes reference to the NPPF relating to grey belt in plan-making and decision-making terms and where the development of homes in the Green Belt should not be regarded as inappropriate, including the requirements to meet the ‘Golden Rules’.</p> <p>The DWNP (draft Wythall Neighbourhood Plan) as drafted makes no reference to the concept of grey belt, despite the significance of this concept to plan-making in areas with significant land in the Green Belt. This contrasts with PPG which expects authorities to identify grey belt land.</p>

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	Housing Needs Assessment and Design Code	<p>The Wythall Neighbourhood Plan Housing Needs Assessment (HNA) was prepared in October 2022 to support the DWNP, prior to the December 2024 NPPF and based on Census data from 2021 and 2011. It is therefore reasonable to accept that the findings of these assessments / studies would likely yield different results compared to if they were undertaken in 2026.</p> <p>Similarly, the Wythall Design Guidelines & Design Codes was prepared by AECOM in October 2023, which was prior to the publication of the December 2023 NPPF.</p> <p>It is reasonable to conclude that the evidence base may now be outdated and therefore should be applied with caution when formulating policy.</p>
	Vision	IM Land welcome the Parish Council’s recognition of the need for new development to be accommodated within the Parish, with a focus on good design, sustainable transport and provision of housing to meet local needs.
	Wythall 2	<p>Bromsgrove District Plan Policy BDP8 relates to Affordable Housing and at BDP8.3 it states ‘the Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking into account local needs, the housing mix in the local area and the impact on viability. A mix of the following tenures will generally be sought: Social rented; Intermediate housing; and Affordable rent’.</p> <p>BDP8 does not contain specific tenure splits within the policy itself. This allows the policy to be flexible and adaptable to changes in market conditions and housing needs during the plan period. BDP8 is clear that the precise mix should be developed on an individual basis through discussions with the Strategic Housing Team.</p> <p>WYTHALL 2 is underpinned by the Wythall Neighbourhood Plan Housing Needs Assessment (HNA) prepared by AECOM in October 2022 to support the DWNP. This report shows the situation at a point in time and is primarily based on Census data from 2021, but also some data from 2011. It is therefore likely that its</p>

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		<p>conclusions could be superseded by the release of updated data which would undermine proposed policy WYTHALL 2 as currently written.</p> <p>WYTHALL 2 is therefore not in accordance with Basic Conditions (a) and (e). The NPPF and PPG are clear that neighbourhood plans should support the delivery of strategic policies contained in local plans, and as worded, WYTHALL 2 is too prescriptive which risks constraining the delivery of affordable housing and not in accordance with the Development Plan policy. As such, WYTHALL 2 should either be deleted, and for the requirement to default to the Development Plan policy, or be amended to avoid including specific tenure splits.</p>
	Wythall 3	<p>The wording of WYTHALL 3 is considered to be overly restrictive by identifying a specific size and type of housing which would be acceptable in principle. Whilst it is welcomed that proposals shall be assessed on their own merits, it is considered that the wording of the policy should be prepared more flexibly. Currently, the policy is considered contrary to Basic Condition (e) as it is not in accordance with Policy BDP7 of the Local Plan which does not prioritise a single dwelling type. This is particularly relevant given the limitations of the HNA as outlined in Section 5 above.</p>
	Wythall 4	<p>Table 5 of the DWNP is a series of Design Guidance Codes for New Development in Wythall Parish which includes some highly prescriptive requirements such as restrictions on number of storeys and densities. Table 6 sets out the average densities in the different character areas within the Parish.</p> <p>The requirements of Policy WYTHALL 4 are onerous and in excess of the requirements of the Development Plan, requiring justification for higher densities. It presents restrictions on some development beyond local policies with little flexibility. It therefore breaches Basic Conditions (a) and (e) and should be amended to ensure it is written in accordance with the Development Plan, to allow for flexibility in the application of its requirements, ensuring development can come forward in line with the NPPF to support the efficient use of</p>

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		land. Additionally, the Design Guidance and Codes Report was prepared in 2023 and therefore based on now superseded National Policy.
	Wythall 5	<p>The Future Homes Standard has not yet legally come into force and therefore, it is inappropriate and premature to have a policy which requires development to comply with future building regulation standards. Consequently, Policy WYTHALL 5 as currently worded could potentially constrain otherwise sustainable development thus failing to accord with Basic Condition d) and therefore, the reference to the Future Homes Standard should be removed from the policy.</p> <p>The Policy could be amended to broaden the requirements whilst retaining alignment to national policy requirements as set out below:</p> <p>“Future-proofing of new development in Wythall Parish will be encouraged in order to assist in achieving the aims of the latest sustainability related national policies. Proposals for development which include measures to reduce carbon emissions from building operations, such as those listed below, will be supported:</p> <p>[Points a – g within Wythall 5 are listed, except for point f].</p> <p>In addition to the above, including the Future Homes Standard into the policy would result in the unnecessary duplication of building regulations standards into planning policy. If or when the Future Homes Standard is brought into force then it would become a national standard as set out in law which development would need to comply with thus there is no need to duplicate this standard in the policy. Additionally, the requirement of chargepoints is already set out in Part S of Building Regulations and such, would again represent unnecessary duplication within the policy text.</p>
	Wythall 6	The list of 20 identified sites includes the Packhorse (Public House) and the Kingswood Meeting House Graveyard, which are of particular note in the context of the proposals at Packhorse Lane. The Packhorse is

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		<p>located adjacent to the north-eastern corner southern parcel. The Kingswood Meeting House Graveyard is located to the north of Packhorse Lane, to the west of the northern parcel and to the north of the southern parcel. It is noted that the official listing of the Grade II Listed Kingswood Meeting House does not make reference to the graveyard.</p> <p>Whilst the overarching aim of the policy can be considered to be in line with the national and local policies in relation to the protection of heritage assets, Paragraph 41 of the PPG requires policies to be concise, precise and supported by appropriate evidence. The assessment underpinning the formation of the list of sites is considered inappropriate in that it fails to identify that important features of the sites which require protection and / or particular consideration. In this regard, the policy is considered vague and would require further assessment or re-wording to ensure it complies with Basic Condition 'a'.</p>
	Wythall 7	<p>Among the sites listed within Appendix B is Site Reference I – Johnson’s Pool, which is located to the south-eastern corner of our site. The space, covering an area of 2.06ha, includes open water, swamp, marsh and uncultivated land with mature trees offering habitats for wildlife. It is a designated Local Wildlife Site.</p> <p>The Policy seeks to protect the space from inappropriate development. IM Land are in support of protecting such spaces and wish to highlight that the current proposal at Packhorse Lane provides both the retention and enhancement of biodiversity and nature features across the Site, as can be seen on the Illustrative Masterplan submitted in support of planning application ref: 26/00252/OUT.</p>
	Wythall 8	<p>The wording of the policy dictates that biodiversity gain, in the first instance, should be provided onsite and where it cannot be, should aim to meet the requirements in accordance with local nature recovery priorities more broadly. However, the inclusion within the requirements of the provision being delivered within Wythall Parish, or even more specifically, in the north and east of the Parish, is considered overly prescriptive and excessive of national Biodiversity Net Gain legislation to the extent that it could constrain</p>

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		<p>sustainable and acceptable development. Consequently, the Policy fails to meet Basic Condition d) to contribute to the achievement of sustainable development.</p> <p>Furthermore, the implication of the policy wording is that proposals which can deliver a 10% biodiversity net gain, but which are outside of the aforementioned areas, would not be supported. This is contradictory to both local and national policy and as such would conflict with Basic Conditions a) and e). It is therefore suggested that the final sentence be removed from the policy wording.</p>
	Wythall 9	<p>Whilst IM Land would be supportive of providing financial contributions towards bus service improvements in principle, the need for these bus service improvements would have to be supported by sound evidence and be relevant to the proposals. Policies BDP6 (Infrastructure Contributions) and BDP16 (Sustainable Transport) seek to improve transportation infrastructure however the proposed policy in WYTHALL 9 adds greater specificity without demonstrating that this provision would be viable.</p> <p>IM Land therefore recommend that the policy is amended to remove reference to the three outlined options for improvement. This is to ensure the policy complies with the Basic Conditions.</p>
WNP18 – Lichfields on behalf of St Philips Land Ltd	General	<p>The representation includes details of the site at Land at Hollywood Golf Course that St Philips has land interests in. Additionally, a site location plan, vision document and a report on Planning Prospectus for Growth have been appended.</p> <p>St Philips would encourage Wythall to consider the land at Hollywood Golf Course for housing allocation in the WNP.</p>
	General	<p>The representation includes commentary on the adopted Bromsgrove District Plan with a housing growth of 7,000 homes across the Plan Period to 2031. Policies BDP3 (Future Housing and Employment Growth) and BDP4 (Green Belt), the District projected the need for 4,700 homes to be built by 2023, and then a Green Belt Review to be carried out in order to develop a further 2,300 homes released from the Green</p>

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		<p>Belt. The Council acknowledged that these remaining 2,300 homes could not be delivered across the District without altering Green Belt boundaries. The result of which is therefore an identified and incumbent need for emerging planning policies to accommodate new housing growth through the release of land from the Green Belt.</p>
	General	<p>The representation includes details of St Philips’ representation in October 2025 on the District Council’s Draft Development Strategy consultation, including concerns in relation to Bromsgrove’s approach to housing growth. In particular, issues were raised concerning a lack of evidence underpinning Bromsgrove’s spatial strategy, taking into account the need to assist with the unmet needs arising in the Greater Birmingham and Black Country Housing Market Area (“GBBCHMA”) and seeking a Green Belt Assessment (that has regard to grey belt land) and an updated Housing and Economic Development Needs Assessment (“HEDNA”), all of which would be relevant factors to the WNP.</p> <p>The representation makes the case why the WNP should make allocations to contribute to addressing the District’s needs, as well as those of GBBCHMA.</p>
	Wythall Housing Needs Assessment	<p>The HNA identified that 324 dwellings have been built in Wythall between 2011-2022, with 204 of these dwellings completed between 2016-2022. Of these 204, just 64 dwellings were affordable (31.4% of new housing in Wythall). The HNA states that at the time of its publication, Wythall did not have a formal housing requirement due to the ongoing review of Bromsgrove’s emerging plan. Thus, the WNP does not assert a housing requirement for the Neighbourhood Plan Area.</p> <p>Drawing upon pro-rated data from Bromsgrove’s HEDNA (2022), the HNA asserts a need for 383 dwellings per year across Bromsgrove District, totalling 6,511 dwellings over the seventeen-year plan period. For Wythall, calculated to be 12.3% of the District’s population at the time, 801 dwellings are stated as required for the Neighbourhood Plan period 2023-2040, equating to 47 dwellings per annum. This rate of delivery exceeds that of 2011-2022 which saw circa 29 dwellings delivered per annum in Wythall.</p>

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		<p>In addition, the HNA posits a need for 11 affordable homes per annum, or 193 homes across the Neighbourhood Plan period (2023-2040). The HNA calculates that, assuming an affordable delivery rate of 40%, 483 dwellings would therefore need to be built in Wythall across the plan period so as to facilitate their delivery. The HNA and the WNP note that the Parish faces challenges of housing affordability, with the median house price of all homes rising by 45.6% in the intercensal period.</p> <p>However, as the above demonstrates, there is a contradiction between the housing requirement in Wythall and the District. Whilst St Philips recognises there has not been a formal housing requirement for the Plan Area, it is argued that a more accurate one should be put forth in the WNP, to adequately address the sharp increase in local housing need for the District, and subsequently, the Neighbourhood Plan Area.</p> <p>Since the publication of the HEDNA and HNA, Bromsgrove’s LHN figure has significantly increased in light of revisions to the NPPF and the requirement of the Standard Method. St Philips contends that the WNP should reflect the latest housing need for the District, to accurately acknowledge the Plan Area’s housing needs.</p> <p>Based on the 2021 Census data, showing Bromsgrove’s population at 93,637 and the WNP’s Plan Area at 12,269, the population of the Neighbourhood Plan area has grown to now comprise 13% of the District. Based on this 13%, therefore, the need for the Neighbourhood Plan Area rises to 1,580 dwellings, or 93 dwellings per annum up to 2040. Yet the WNP makes no provisions for such housing needs.</p> <p>St Philips therefore encourages the Parish to reassess local housing needs, within the present context, so as to adequately address current and future needs of the Neighbourhood Plan Area. In the absence of the WNP defining housing need and including land to meet the delivery of new homes, the WNP is unlikely to be found sound at Examination in Public and would fail to be in conformity with either the BDP or national policy.</p>

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	Wythall 1	<p>This policy applies to various community facilities (in Use Classes F1, F2 and Sui Generis) across the Neighbourhood Plan Area; the Site is one of these facilities, under Ref: 49.</p> <p>St Philips challenges this policy for being too restrictive and inhibiting development on suitable, deliverable sites. Point a) requires that “equivalent alternative provision” must currently exist in the village – as opposed to elsewhere in the Neighbourhood Plan area, or even the wider district. There are three golf courses and a driving range within the Neighbourhood Plan area. The Fulford Heath Golf Club is only 2.4 miles south of Hollywood Golf Course, and the Kings Norton Golf Club is just 3.3 miles southwest of the site, close to the club in Fulford. These two golf courses are merely a 7 minute drive from the Hollywood Golf Course, but due to the restrictive language in Wythall 1 – requiring alternate provision “within the relevant village” – these clubs may not be accepted as suitable alternatives. This is unreasonably restrictive.</p> <p>Moreover, the wording in Wythall 1 does not align with that in the adopted Local Plan. Policy BDP25 (Health and Wellbeing) of the adopted Bromsgrove Local Plan stipulates that Bromsgrove District Council will support proposals that protect, retain or enhance existing sport, recreational and amenity assets. BDP25.3 states that the loss of existing outdoor open space, sport and recreation facilities will not be permitted unless there is up-to-date evidence that: [included sub-points a-c within BDP25.3].</p> <p>The wording in the Local Plan policy includes a caveat for proposed schemes that offer wider community benefits outweighing the harm caused by the loss of the facility; no such caveat is contained in the WNP policy. Instead, the WNP only offers the limited options of delivering an equivalent facility in the same village or marketing the golf course for 12 months – neither of which seem feasible within the settlement of Wythall / Hollywood.</p> <p>Whilst St Philips broadly supports the provision of adequate open space and outdoor sports facilities, as in line with national policy requirements, this does not extend to protecting private golf courses from development. Bromsgrove District Council have allocated land at Bromsgrove Golf Centre as a potential housing site to meet the local housing need in the DDS. Despite the Golf Centre being in the Green Belt, this</p>

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		<p>draft allocation indicates Bromsgrove’s priorities in transforming these types of land uses for wider housing benefits. As Bromsgrove have noted in their Open Space Study (2022), Outdoor Sports Facilities do not include private golf courses. Paragraph 5.3.4 stipulates: “Private Golf courses and golf driving ranges with limited public accessibility have been excluded from Local Standards relating to Outdoor Sports Provision since they have limited public accessibility.”</p> <p>The Site in its current form is not publicly accessible and thus, residents are unable to benefit from the health and wellbeing of enjoying the open green space unless they purchase a membership at the golf course club.</p> <p>The private nature of the golf club undermines its labelling as a “community facility” as it is not accessible for the majority of the community. St Philips therefore challenges the idea that Hollywood Golf Course should be considered a “community facility” afforded protection under WYTHALL 1.</p> <p>The representation includes appeal decisions for the loss of private golf courses, and how this decision can be weighed up against a poor housing land supply and high local housing need.</p> <p>Thus, in the WNP, St Philips contends that it would be more appropriate that Wythall 1 be caveated with the requirement to demonstrate need for the type of development proposed, and that this need can demonstrably outweigh the value of the land as an open area. Then, the planning balance can be engaged with, allowing developers to highlight the benefits of such a scheme and the local planning authority can consider the proposed development’s merits in a District-wide context.</p>
	General	<p>The WNP should look to identify land within the Neighbourhood Plan Area that would be appropriate for Green Belt release, to support the District Council in its aims of releasing Green Belt sites for development.</p> <p>At present, the WNP makes no reference to ‘grey belt’ as a concept nor does it highlight sites which could meet the definition. This may expose the Neighbourhood Plan Area to uncertain, speculative development</p>

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		<p>applications across the Parish. Instead, St Philips encourages the WNP to conduct their own Green/Grey Belt Assessments, capturing appropriate land – such as the Site at Hollywood Golf Course – for housing growth. The representation includes a high-level assessment of the site’s contribution to Green Belt purposes A, B and D showing that the site does not strongly contribute to any purposes and should be identified as grey belt. Furthermore, St Philips considers that the release of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.</p>
	General	<p>Development Plans, including Neighbourhood Plans, need to pass tests of soundness, as per Paragraph 36 of the NPPF. St Philips contends that the WNP falls short of being found sound for the following reasons:</p> <ol style="list-style-type: none"> 1. Despite a significant housing need across the District, with a sharp rise in the local housing figure, the WNP makes no allocations to meet the area’s needs, nor does it acknowledge the needs of the GBBCHMA. The HNA identifies housing need across the Neighbourhood Plan Area, but the WNP does not acknowledge these needs (in conflict with Paragraph 36a); and 2. The WNP has labelled a private golf course a “community facility”, affording it protections against development under proposed Policy WYTHALL 1, despite the fact it is not publicly accessible and does not serve the community. Whilst this label is not a formal designation grounded in a statutory or policy basis, the WNP still purports to essentially safeguard these sites from development, with restrictive caveats that are unjustified and do not support the adopted Local Plan (in conflict with Paragraph 36a and 36b).
WNP19 – NHS Herefordshire and Worcestershire	General	<p>The ICB recognises the significant work undertaken by Wythall Parish Council and the Steering Group to develop a detailed and locally informed Neighbourhood Plan. We particularly welcome:</p> <ul style="list-style-type: none"> • The clear evidence base describing local demographics, including an ageing population profile.

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Integrated Care Board		<ul style="list-style-type: none"> • The strong emphasis placed on green infrastructure, active travel, walkability and healthy lifestyles. • Recognition of health and wellbeing as cross-cutting themes within the Vision and Objectives • Identification of existing GP practices, pharmacies and dental services within the Audit of Community Facilities. <p>These elements align with national healthy placemaking principles and provide a strong foundation from a population health perspective.</p>
	Population Health and Demographic Context	<p>The Plan’s population analysis identifies that Wythall Parish has a comparatively older population, with significantly higher proportions of people aged 50 and over, including nearly double the proportion of those aged 75+ compared with the England average. This demographic profile is particularly relevant for healthcare planning, as older populations typically have:</p> <ul style="list-style-type: none"> • Higher levels of long-term conditions • Greater reliance on primary care and community services • Increased needs for accessible, local healthcare provision
	Healthcare Infrastructure and Community Facilities, Wythall 1 and Audit of Community	<p>The ICB welcomes the inclusion of GP practices, pharmacists and dental services within the Audit of Community Facilities and Infrastructure and their recognition as important local assets. We also note positively that Policy WYTHALL 1 allows for developer contributions towards: Provision of primary healthcare services, Car parking associated with primary healthcare facilities However, healthcare is largely framed as a community facility rather than as critical social infrastructure, and references are primarily protective rather than forward-looking.</p>

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	Facilities and Infrastructure	
	General and Wythall 1	<p>Recommendations to strengthen the Plan from a healthcare and population health perspective, the ICB recommends that it is amended to:</p> <ol style="list-style-type: none"> 1. Explicitly recognise primary and community healthcare as critical infrastructure, distinct from general community facilities. 2. Require early engagement with the relevant NHS / ICB where development may generate additional healthcare demand. 3. Require development proposals to demonstrate that healthcare capacity is sufficient, or that appropriate mitigation and investment will be secured.
WNP20 – Persimmon Homes South Midlands on behalf of EAW Taylor Will Trust	General	<p>Persimmon Homes and the Taylor Trustees support the preparation of the Wythall Neighbourhood Plan (hereafter the Plan) and recognise the extensive community engagement undertaken. The document provides a clear vision and locally distinctive framework.</p> <p>Notwithstanding these positive elements, there remains a significant concern that the Plan, as currently drafted, does not include any housing allocations, despite acknowledging both strategic and local housing pressures. The Plan therefore requires modification to ensure flexibility to respond to emerging strategic housing requirements and avoidance of overly restrictive or non-deliverable policy burdens.</p>
	General	<p>The Plan correctly acknowledges the absence of an up to date housing requirement, the ongoing preparation of the Bromsgrove Local Plan Review and the likely need for green belt release. Conversely, it currently places significant emphasis on numerous constraints (such as green belt, local character and existing infrastructure) and provides limited positive direction for growth locations or delivery mechanisms.</p>

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		<p>The Plan must be considered within the wider strategic planning context; Birmingham City Council has a well-established requirement for overspill housing and the emerging Bromsgrove Local Plan Review is seeking to address its own unmet housing needs.</p> <p>Considering the above, it is disappointing that the plan has chosen not to allocate potential sites for development. By doing so, the plan would provide opportunities for local communities to influence local development, meet housing need and gain stronger planning protections.</p> <p>A draft neighbourhood plan must be capable of meeting the Basic Conditions, including general conformity with strategic policies and the ability to contribute to sustainable development. Without allocations, it is difficult demonstrate that these are met as there is no meaningful mechanism by which housing needs can be met or tested.</p> <p>The Plan should include a clear positive strategy for accommodating growth, consistent with NPPF para. 11, acknowledging that green belt release may be necessary and avoid wording that could prejudice or delay the delivery of strategic sites.</p> <p>It is important to note that there are sustainable and deliverable locations within the Neighbourhood Area that could appropriately be considered for allocation, such as land represented by Persimmon Homes and the Taylor Trustees which now benefits from substantially improved public transport connectivity following the opening of Kings Heath Train Station.</p>
	Wythall 2 and Wythall 3	<p>The Plan draws on a robust Housing Needs Assessment, which is supported.</p> <p>However, the lack of a defined housing requirement limits policy effectiveness and prescriptive requirements on mix and tenure can pose a risk to viability and deliverability.</p>

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		<p>The onus to deliver First Homes with a 50% discount (Wythall 2, para 2i) or Shared Ownership equity stakes at 10% minimum (Wythall 2, para 2ii) should be expressed as guidance rather than fixed requirements and include amended wording such as ‘unless viability or site specific circumstances indicate otherwise’.</p> <p>They should align clearly with strategic Local Plan policies (BDP7–BDP10), or if timings allow, refer to new policies within the Bromsgrove Local Plan Review.</p>
	Wythall 4	<p>The emphasis on local character is noted and supported in principle, however subjective wording that may lead to inconsistent decision making should be avoided. For example, ‘integrate well with surrounding development’, could be subject to personal design judgements. Furthermore, maintaining a ‘village feel’ is not a defined planning concept and is difficult to apply consistently across schemes of different scales. This could become a blanket justification for resisting development.</p> <p>Some wording could therefore be refined. For example, ‘development should respect local character and be in keeping with its surroundings’ could be re-written as ‘development proposals should demonstrate how they respond to the defined characteristics of the relevant character area (as set out in the Design Code/s), including scale, layout and landscape structure, while making efficient use of land’.</p> <p>There is the potential for overly restrictive density expectations which risks conflict with efficient use of land (NPPF para. 125). There are no numerical density ranges provided and ‘overdevelopment’ is subjective without clear parameters.</p> <p>Settlement patterns vary widely across Wythall and there is no clear guidance on how this applies to new strategic scale sites.</p> <p>In sustainable and accessible areas (such as those in walking/cycling distance to local facilities and transport nodes), higher densities should be explicitly supported.</p>

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	Wythall 5	Duplication or conflict with national Building Regulations and emerging policy should be avoided and all requirements should be clearly justified, viable and consistent with national policy. Technical standards that extend beyond national frameworks should not be required, unless evidenced.
	Wythall 7 and Wythall 8	The protection of green infrastructure is supported. It should be ensured that all Local Green Space designations meet the relevant NPPF tests (para. 106–107), are robustly evidenced and not extensive in scale and avoid the designation of land with reasonable development potential.
	Wythall 1	The aim of protecting valued facilities is supported in principle. Where it is proposed that new development should identify and suggest contributions to meet specific investment priorities, it should be clarified that any contributions must meet CIL Regulation 122 tests: necessary, directly related and fairly and reasonably related in scale and kind. Prescriptive or non-site-specific requirements should be avoided.
	Wythall 9, Wythall 10 and Wythall 11	We are in support of sustainable transport improvements providing that policies do not require the delivery of infrastructure beyond what is proportionate to development or undermines viability. These policies should include flexibility linked to the scale of development, viability and deliverability.
	Deliverability and viability	There is a risk that cumulative policy requirements risk reducing site viability and delaying the delivery of much needed housing.

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		The Plan should explicitly confirm that policies will be applied flexibly and in a manner consistent with the presumption in favour of sustainable development, having regard to viability, site specific circumstances and the need deliver housing and economic growth.
WNP21 – Persimmon Homes South Midlands and S. Wiltshire	General	<p>Persimmon Homes and the landowner support the preparation of the Wythall Neighbourhood Plan (hereafter the Plan) and recognise the extensive community engagement undertaken. The document provides a clear vision and locally distinctive framework.</p> <p>Notwithstanding these positive elements, there remains a significant concern that the Plan, as currently drafted, does not include any housing allocations, despite acknowledging both strategic and local housing pressures. The Plan therefore requires modification to ensure flexibility to respond to emerging strategic housing requirements and avoidance of overly restrictive or non-deliverable policy burdens.</p>
	General	<p>The Plan correctly acknowledges the absence of an up to date housing requirement, the ongoing preparation of the Bromsgrove Local Plan Review and the likely need for green belt release. Conversely, it currently places significant emphasis on numerous constraints (such as green belt, local character and existing infrastructure) and provides limited positive direction for growth locations or delivery mechanisms.</p> <p>The Plan must be considered within the wider strategic planning context; Birmingham City Council has a well-established requirement for overspill housing and the emerging Bromsgrove Local Plan Review is seeking to address its own unmet housing needs.</p> <p>Considering the above, it is disappointing that the plan has chosen not to allocate potential sites for development. By doing so, the plan would provide opportunities for local communities to influence local development, meet housing need and gain stronger planning protections.</p> <p>A draft neighbourhood plan must be capable of meeting the Basic Conditions, including general conformity with strategic policies and the ability to contribute to sustainable development. Without allocations, it is</p>

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		<p>difficult demonstrate that these are met as there is no meaningful mechanism by which housing needs can be met or tested.</p> <p>The Plan should include a clear positive strategy for accommodating growth, consistent with NPPF para. 11, acknowledging that green belt release may be necessary and avoid wording that could prejudice or delay the delivery of strategic sites.</p> <p>It is important to note that there are sustainable and deliverable locations within the Neighbourhood Area that could appropriately be considered for allocation, such as land represented by Persimmon Homes on behalf of S.Wiltshire.</p>
	Wythall 2 and Wythall 3	<p>The Plan draws on a robust Housing Needs Assessment, which is supported.</p> <p>However, the lack of a defined housing requirement limits policy effectiveness and prescriptive requirements on mix and tenure can pose a risk to viability and deliverability.</p> <p>The onus to deliver First Homes with a 50% discount (Wythall 2, para 2i) or Shared Ownership equity stakes at 10% minimum (Wythall 2, para 2ii) should be expressed as guidance rather than fixed requirements and include amended wording such as ‘unless viability or site specific circumstances indicate otherwise’.</p> <p>They should align clearly with strategic Local Plan policies (BDP7–BDP10), or if timings allow, refer to new policies within the Bromsgrove Local Plan Review.</p>
	Wythall 4	<p>The emphasis on local character is noted and supported in principle, however subjective wording that may lead to inconsistent decision making should be avoided. For example, ‘integrate well with surrounding development’, could be subject to personal design judgements. Furthermore, maintaining a ‘village feel’ is not a defined planning concept and is difficult to apply consistently across schemes of different scales. This could become a blanket justification for resisting development.</p>

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		<p>Some wording could therefore be refined. For example, ‘development should respect local character and be in keeping with its surroundings’ could be re-written as ‘development proposals should demonstrate how they respond to the defined characteristics of the relevant character area (as set out in the Design Code/s), including scale, layout and landscape structure, while making efficient use of land’.</p> <p>There is the potential for overly restrictive density expectations which risks conflict with efficient use of land (NPPF para. 125). There are no numerical density ranges provided and ‘overdevelopment’ is subjective without clear parameters.</p> <p>Settlement patters vary widely across Wythall and there is no clear guidance on how this applies to new strategic scale sites.</p> <p>In sustainable and accessible areas (such as those in walking/cycling distance to local facilities and transport nodes), higher densities should be explicitly supported.</p>
	Wythall 5	Duplication or conflict with national Building Regulations and emerging policy should be avoided and all requirements should be clearly justified, viable and consistent with national policy. Technical standards that extend beyond national frameworks should not be required, unless evidenced.
	Wythall 7 and Wythall 8	<p>The protection of green infrastructure is supported.</p> <p>It should be ensured that all Local Green Space designations meet the relevant NPPF tests (para. 106–107), are robustly evidenced and not extensive in scale and avoid the designation of land with reasonable development potential.</p>
	Wythall 1	The aim of protecting valued facilities is supported in principle.

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		<p>Where it is proposed that new development should identify and suggest contributions to meet specific investment priorities, it should be clarified that any contributions must meet CIL Regulation 122 tests: necessary, directly related and fairly and reasonably related in scale and kind.</p> <p>Prescriptive or non-site-specific requirements should be avoided.</p>
	Wythall 9, Wythall 10 and Wythall 11	<p>We are in support of sustainable transport improvements providing that policies do not require the delivery of infrastructure beyond what is proportionate to development or undermines viability.</p> <p>These policies should include flexibility linked to the scale of development, viability and deliverability.</p>
	Deliverability and viability	<p>There is a risk that cumulative policy requirements risk reducing site viability and delaying the delivery of much needed housing.</p> <p>The Plan should explicitly confirm that policies will be applied flexibly and in a manner consistent with the presumption in favour of sustainable development, having regard to viability, site specific circumstances and the need deliver housing and economic growth.</p>
WNP22 – Harris Lamb on behalf of Barratt Redrow, the Church Commissioners for England, Bloor Homes and Birmingham	General	<p>The Bromsgrove District Local Plan was adopted in January 2017. It was prepared to cover the plan period 2011-2030. The NP seek to use the Local Plan as a basis for its policies on housing need and allocations.</p> <p>The NP plan period extends to 2040, 10 years beyond the time period of the adopted Local Plan. The policies, housing requirement and development strategy in the adopted Local Plan do not, therefore, provide an evidence basis for the emerging Neighbourhood Plan given the NP plan period extends beyond the Local Plan plan period. The NP plan period means that it is not in conformity with an adopted Local Plan resulting in a conflict with the basic conditions.</p> <p>Furthermore, the adopted Local Plan required 7,000 dwellings to be delivered with the plan period. However, provision is only made for the development of 4,700 dwellings. The Local Plan advises that a Local</p>

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Property Group Holdings		<p>Plan review would be undertaken by “2023 at the latest” to remove land from the Green Belt and allocate it for development (Policy BDP3). This has not happened. The housing delivery policies in the NP are, therefore, wrong to assume that the housing delivery and Green Belt policies in the Local Plan are appropriate and up to date for the purposes of informing the NP. Had the Local Plan review taken place as proposed further housing allocations could have been directed to Wythall to meet the Local Plan housing requirement.</p> <p>The NP fails to recognise that the Local Plan requires additional housing allocations to be made beyond 2023, and these allocations will need to be in the Green Belt. The is a significant omission that fails the basic conditions.</p>
	General	<p>The Council are in the process of preparing a new Local Plan. The District Council consulted on a “Draft Development Strategy” in June 2025. This document proposes 6 broad distributions strategies for growth. There is no certainty which strategy will be adopted at this time. Accordingly, the NP cannot be prepared to be in general conformity with the strategic policies of the emerging Plan as these aren’t known yet. This is accepted by the Neighbourhood Plan which states [quoted parts of paragraphs 104 and 105 of the Neighbourhood Plan].</p> <p>Given that the adopted Local Plan is out date, and the emerging Local Plan is in the early stages of the plan making process, there is no robust evidence base to inform the NP. This renders it ineffective. The NP is being prepared prematurely.</p> <p>Furthermore, the emerging Local Plan seeks to direct significant development to the Wythall NP area. This is not reflected or reference in the NP. It is highly likely that the emerging Local Plan will render the NP out of date as soon as it is adopted.</p>
	General	<p>The emerging NP is based on Bromsgrove’s Green Belt Purposes Assessment (Aug 2019). Given the age of the Green Belt assessment it does not address the concept of Grey Belt land and it is subsequently out of</p>

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		<p>date as an evidence base document. Furthermore, no regard has been had to Bromsgrove District’s latest Green Belt Study (June 2022) in the NP. The NP evidence base on Green Belt is out of date.</p> <p>No Green Belt land release is proposed by the NP. There are, however, elements of the NP which acknowledge, or allude to, Green Belt release being necessary, notably paragraph 99 which states [quoted paragraph 99 of the Neighbourhood Plan].</p> <p>This acceptance is welcome, however, it would be better to use this starting point to plan meaningfully for such release once Bromsgrove’s strategic polices are known. In doing so, it would avoid criticism of the Plan being premature, and not in line with up-to-date evidence as required by National Policy.</p>
	General	<p>In summary, the NP as drafted does not meet the basic conditions ,principally in relation to its adherence to national policy or being in conformity with the strategic policies of the District level Local Plan. The housing policies within the adopted Local Plan are acknowledged to be out of date, and the emerging Local Plan has not yet determined which strategy is to be followed. The NP, therefore, cannot be in accordance with the basic condition a) as the adopted strategy is out of date and the emerging strategy is not yet known.</p> <p>Further the NP does not meet basic condition e) as National Policy requires Plans to be based on up-to-date evidence. This is not the case here. It is not even based on the District Council’s most up-to-date evidence in relation to Green Belt Assessments. There is every prospect that the emerging Local Plan will direct new allocations to the Wythall Neighbourhood Plan area in order for it to meet its housing need given that Wythall is one of the larger more sustainable settlements in the District.</p> <p>In order to address these concerns, we would suggest that the NP should be paused and not progress to Examination until such time as the Bromsgrove Local Plan has progressed further and the development needs of the District are established. At that point, the NP could be prepared having full regard to the strategic policies of the district and to make appropriate provision within it.</p>