

Our Ref: P8270/jp
Date: 26th March 2026

Strategic Planning,
Bromsgrove District Council,
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Market Street,
Bromsgrove,
Worcestershire,
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BY EMAIL ONLY: [REDACTED]

Dear Sir/Madam

**Wythall Neighbourhood Plan
Representations on behalf of Taylor Wimpey**

Harris Lamb Planning Consultancy is instructed by Taylor Wimpey ("**TW**") to submit representations to the emerging Wythall Neighbourhood Plan, and we make the following comments. TW 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.

Our representations to the Neighbourhood Plan ("**NP**") must be considered having regard to the basic conditions that underpin Neighbourhood Development Plans which are set out below:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- (d) the making of the order contributes to the achievement of sustainable development,
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),



(f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and

(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

Plan Period

The adopted development plan for Bromsgrove is out of date with regard to its housing land supply.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.

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,

"The Emerging Local Plan has not so far produced proposals which would help to set future housing requirements in the Parish.....Consideration of the amounts of housing likely to be provided in the Parish and therefore of the amount of affordable housing delivered through that is therefore currently not known. The Neighbourhood Plan concentrates on matters that should guide affordable housing provision based on assessed housing needs, whatever total the Parish is eventually asked to accommodate"
(Para 105))

The Neighbourhood Plan cannot be in conformity with Basic Condition e), because the strategic policies are not yet known.

Green Belt Assessment

Paragraph 32 of The National Planning Policy Framework ('*The Framework*') states,

"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals"

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.

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 which states,

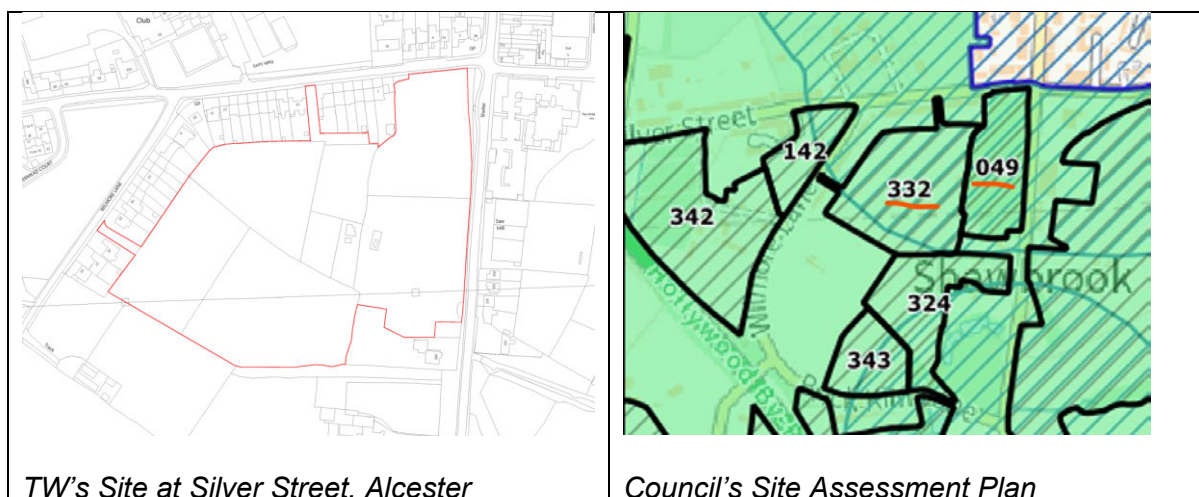
“The development plan for Bromsgrove is out of date with regard to its housing land supply. The updated National Planning Policy Framework and increased Local Housing Requirements applying to Bromsgrove District will increase the likelihood of Green Belt land releases within the district to facilitate development, or development on Green Belt land through speculative development proposals, including in Wythall Parish.”

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.

Land at Silver Street – Proposed Allocation

TW is promoting land to the south of Silver Street and to the west of Alcester Road, at Drakes Cross in Wythall for residential development. The site boundary is shown below, but in the Council’s Site Assessment Report, it is referred to as two separate sites:

- Site 332 – Land south of Silver Street, Hollywood (the west part of the site); and
- Site 049 – Land adjacent to 260 Alcester Road, Hollywood (the east part of the site).



The site area is approximately 5ha and it could deliver around 125 new dwellings with a large area of new high quality public open space. It is in a sustainable location adjacent to Drakes Cross on the edge of Hollywood and to the north of Wythall. It is bound by housing fronting onto Silver Street to the north and Wilmore Lane to the west, and by Alcester Road to the east. The southern boundary is defined by an established hedgerow.

The site consists of three principal field parcels defined by established hedgerows. There is an area of woodland scrub on the east side of the site (site ref 049) that has been thinned in recent years. A small stable building is located in the centre of the site related to former equestrian use.

The site can be accessed from three field gates which are respectively located off Alcester Road, Silver Street and Wilmore Lane.

The Council's Site Assessment of the west side of the site (Site 332) states: '*there are very few limiting constraints associated with this site*'. For the east side of the site (Site 049) it also states: '*there are very few limiting constraints associated with this site*' as well as '*despite scattered tree cover, there is no TPO affecting the site*'.

Regarding benefits, the site is available and can deliver a mix of around 125 new homes, including a range of affordable housing, within the short term to help meet Bromsgrove's needs. Areas of high quality public open space would be created. There would be economic, environmental and social benefits, all underscoring the sustainable nature and characteristics of the site.

On detailed matters, any proposed development scheme would address any noise, drainage, flood risk, ecology, biodiversity or heritage matters, but there are not considered to be any constraints that would prevent the allocation or development of the site for a residential scheme and there are a range of benefits that would be delivered.

Accordingly, we propose that it should be allocated for development of around 125 dwellings in both the NP and emerging Local Plan.

Summary

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 strategy is not yet known

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 District Council when it finalises the emerging Local Plan that it will direct new allocations to Wythall in order for it to meet its housing need, because Wythall is one of the larger more sustainable settlements in the District capable of accommodating residential development. The land at Silver Street is proposed as a suitable location to be allocated for residential development. As it stands, it is considered the NP is premature in respect of the District Council's Local Plan.

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.

Should you have any questions on the above please do not hesitate to contact me.

Yours faithfully



**John Pearce BSc (Hons) MTPL MRTPI
Associate**

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