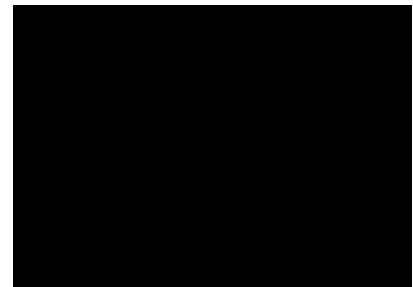




Our Ref: P8253/SH/hr  
 Date: 21<sup>st</sup> April 2024



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Dear Sir/Madam

**Wythall Neighbourhood Plan  
 Representations on behalf of Barratt Redrow, the Church Commissioners for England,  
 Bloor Homes and Birmingham Property Group Holdings**

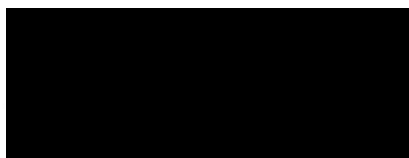
Harris Lamb Planning Consultancy (“**HLPC**”) is instructed by Barratt Redrow, the Church Commissioners for England, Bloor Homes and Birmingham Property Group Holdings (“**the Joint Consortium**”) to submit representations to the emerging Wythall Neighbourhood Plan (“**NP**”). We have a number of concerns with consultation draft NP including its effectiveness as a decision-making tool.

**The NP Plan Period and Conformity with the adopted Local Plan**

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.

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.

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 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 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.



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. This is a significant omission that fails the basic conditions.

### **The emerging Local Plan**

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 distribution 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,

***"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)**

Given that the adopted Local Plan is out of 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.

Furthermore, the emerging Local Plan seeks to direct significant development to the Wythall NP area. This is not reflected or referenced 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.

### **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). Given the age of the Green Belt assessment it does not address the concept of Grey Belt land and it is subsequently out of 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.

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,

***"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.

### **Summary**

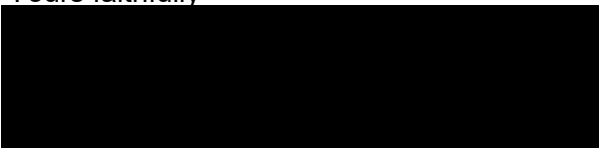
In summary, the NP as drafted does not meet the basic conditions ,principally in relation to its adherence to national policy or being in conformity with the strategic policies of the District level Local Plan. The housing policies within the adopted Local Plan are acknowledged to be out of date, and 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 adopted strategy is out of date and the emerging 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 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.

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



**Simon Hawley BA (Hons) MA MRTPI  
Director**

