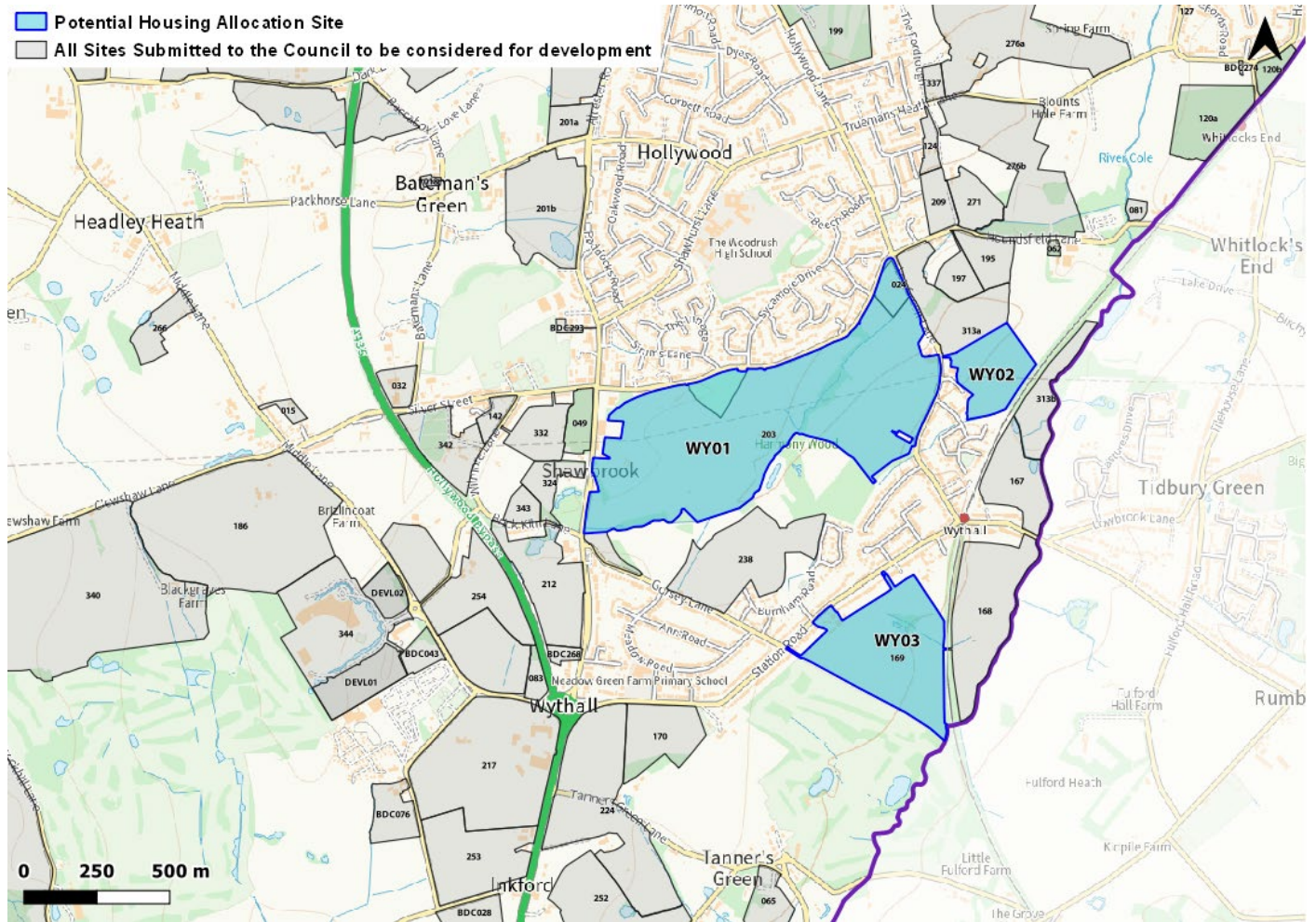


Settlement Summary: Wythall



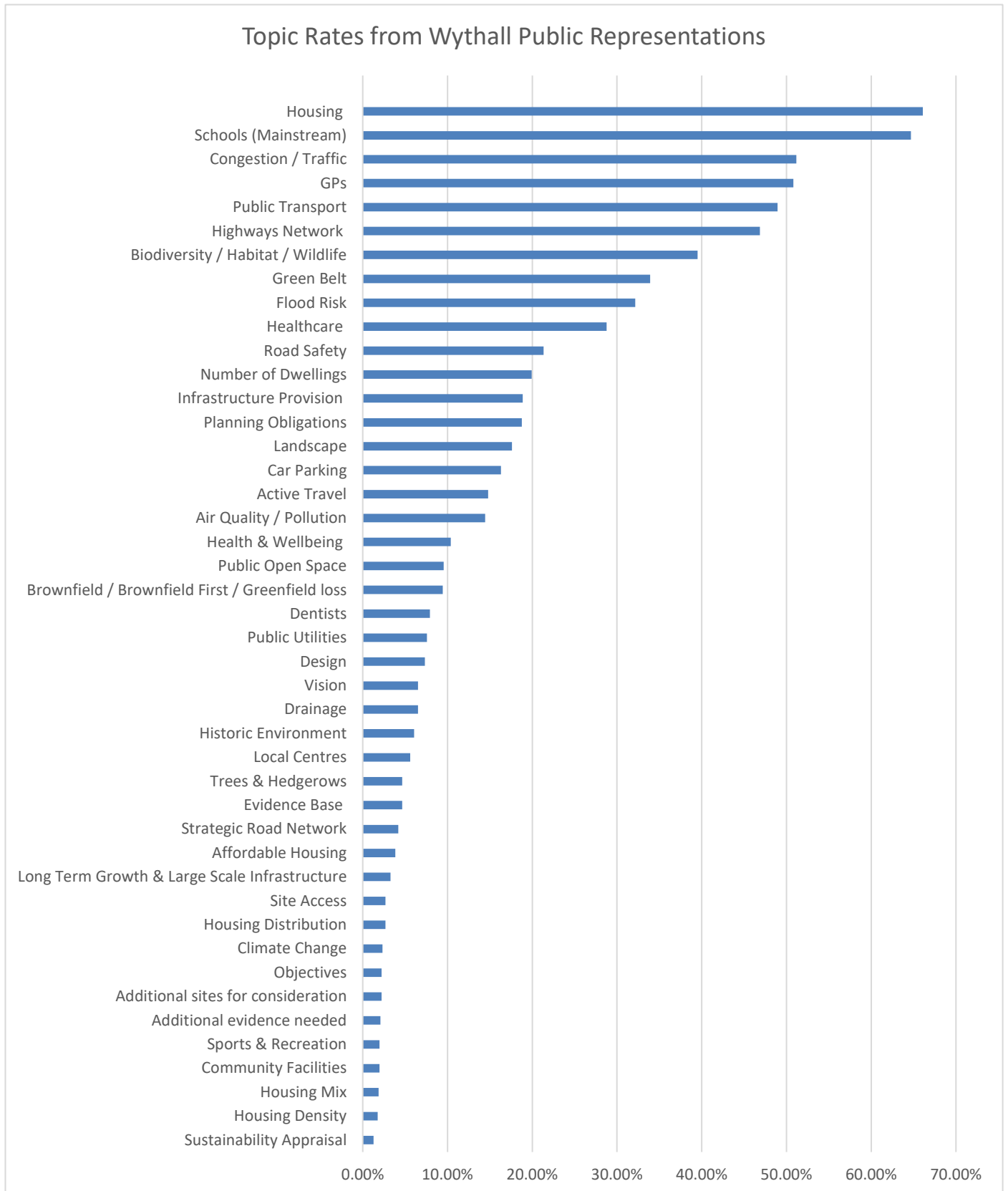
Introduction

This document summarises the responses received during the Draft Development Strategy consultation, which was undertaken between 30th June and 20th October 2025. This document covers responses on the potential site allocations (shown in blue on the above map) as well as topics raised about Wythall in general. For context, the map above also shows all other sites in proximity to the village which were submitted through the Call for Sites exercise (shown edged in black on the above map), which were assessed but not included for potential allocation. Comments received on these sites were used to help inform the settlement-wide summary section. This document represents a summary of all comments received. It does not present specific individual representations, or any analysis of the information received.

All summaries have been set out under the following sub-headings: 'settlement-wide' or 'site specific'. They have also been separated by type of respondent, as follows:

- Members of the Public
- Statutory Consultees and Other Stakeholders
- Developers/Landowners

Members of the Public



Members of the Public: Settlement-wide – Topics

Cumulative impact of development on both Wythall and Hollywood: Nearby housing development in Solihull Borough (Tidbury Green, Dickens Heath and Earlswood) are close to these proposed sites and will have a significant cumulative impact, for example proposed development south of Norton Lane (which sits very close to proposed sites). These cumulative impacts will affect traffic junctions and highway safety, school places and GP places. Cross-boundary assessments and a cross-boundary evidence base should be developed. Within Wythall, any potential redevelopment of the Wythall Green Business Park will add to this cumulative impact.

Coalescence: the scale of expansion for Wythall is considered disproportionate, with increased risk of coalescence between Hollywood and Wythall so both settlements lose their distinct identities.

Flooding: Wythall has suffered very significant recent flooding (May 2018 River Cole flood) so additional development will increase the risk of further flooding by reducing potential water soakaways, part of the Houndsfield Lane site is a flood plain, impact of flooding felt across Wythall and Hollywood so wider flood risks should be considered across both settlements as a whole (not just flooding on proposed development sites).

Wythall station: Wythall station is small and has no parking which results in people being dropped off by car, the Norton Lane, Station Road and Lea Green Lane junction is dangerous, no room for station expansion and limited railway services.

Site connectivity: Sites are not well related to each other, all sites have significant distances to the nearest shops so are likely to be car reliant.

Education: No additional secondary school provision is proposed, the catchment area would need to be amended as cross-boundary admissions currently form a significant number of places- particularly from Solihull, need for primary school provision as Meadow Green is full.

Health: Residents struggle to get a GP appointment as it is - need to expand existing services before any additional new homes are built.

Hollywood Sports Centre constraints: population increase would render sports facilities out of date, limited parking nearby results in dangerous on-street parking.

Highways: The Wythall Island (A435/A4023) junction already experiences significant congestion and crashes. Accidents have taken place at the junction of Houndsfield Lane and Lea Green. Alcester Road, Station Road, and the approach to the M42 are already congested at peak times. Houndsfield Lane suffers from congestion, narrow carriageway widths, and poor visibility at several bends.

In Hollywood (but close to the proposed sites) pedestrian safety is a concern on Beaudesert Road, May Lane, Shawhurst Lane and surrounding roads due to the proximity to Coppice Primary School, Woodrush High School and Hollywood Medical Practice.

Standout / unique insights raised

These are recurring, insights (often location specific) that go beyond general topic labels:

- Coalescence: not just between villages but reducing the gap between the Wythall and Birmingham - contrary to the NPPF on stopping settlements merging.
- 2018 River Cole floods: Lea Green Lane, Houndsfield Lane ford, Hollywood Brook repeatedly cited as flooding hotspots.

- Multiple accident blackspots (at key junctions) are identified. Safety concerns around additional traffic on rural lanes.
- Lack of facilities at Wythall station: notably car parking - limits its usefulness to justify what is considered a high level of development in Wythall.

Members of the Public:
WY01 – Key Points
Coalescence: coalescence between Hollywood and Wythall resulting in both villages losing their distinct identity, scale of the site is considered large relative to the existing village, cumulative impact of development of this scale on surrounding infrastructure.
Highway safety concerns: junction of Houndsfield Lane and Lea Green Lane has experienced accidents and the Hollywood Lane and Alcester Road junction has experienced accidents. Houndsfield Lane, Lea Green Lane and Hollywood Lane considered too narrow for additional traffic.
Flooding: The site currently acts as natural flood plain for the River Cole/Shaw Brook. Wythall experienced significant floods in 2018. Lea Green Lane floods regularly, Wythall’s existing flood mitigation scheme is considered insufficient.
Education: The Coppice, Meadow Green and Woodrush High School are all full or oversubscribed, WY01 mentions only primary school provision but with no secondary school provision.
Health: GP surgeries are full and have no capacity for new patients, unclear where a new GP surgery would be built.
Contamination: possible historic waste tipping which would need full investigation.
Biodiversity: site includes some of Wythall’s oldest trees, loss of wildlife corridors, which would be detrimental to bats and many other animals.

Members of the Public:
WY02 – Key Points
Highway safety: Concerns around the safety of the access onto Lea Green Lane as it is considered narrow, with limited room for expansion and it is considered that the site access is on one of the most constrained roads in the area.
Cumulative impacts: Site may be smaller than other proposed sites but still contributes to disproportionate scale of development in Wythall. Reduces gap between Hollywood, Wythall and Tidbury Green.
Green belt: loss of important green belt land.
Health: insufficient healthcare provision locally.
Education: No identified secondary school capacity for any of the Wythall allocations.
WY02 lies within the drainage catchment that experienced major flooding in 2018 (River Cole / Shawbrook). Flood mitigation work would be vital.
Biodiversity: loss of important habitats e.g. foxes.

Members of the Public:

WY03 – Key Points

Cumulative impact: Site acknowledged as being smaller than the other sites but still contributes to overall cumulative impacts.

Coalescence with Tidbury Green.

Highway safety: Station Road, Alcester Road and connecting lanes (Houndsfield Lane, Lea Green Lane, Norton Lane) are already congested, congestion around Wythall station contributes to reduced visibility.

Education: No secondary school provision, even when the current secondary school has limited places.

Healthcare: Inadequate GP services.

Flooding: High water table and inadequate drainage on Station Road. Development would increase the risk of flooding.

Biodiversity: loss of ancient trees and hedgerows, loss of habitats.

Examples of suggested specific infrastructure requirements

Flood risk

- Further flood mitigation considered vital before any development could go ahead. Recent flood alleviation scheme needs upgrading.
- Retention ponds, swales, permeable surfaces and rainwater harvesting.
- Retention and enhancement of existing ditches, culverts and ponds.
- Major drainage and sewerage upgrades needed, especially around Lea Green Lane.

Highways

- Junction upgrades such as at:
- Alcester Road / Houndsfield Lane.
- Lea Green Lane / Houndsfield Lane (identified as an accident blackspot).
- Hollywood Lane junctions.
- New access roads purpose-built for the developments, not routed through existing estates.
- Traffic-calming measures: speed restrictions, new crossings, better lighting.
- HGV routing and construction traffic management.

Education

- Additional school provision, especially secondary school expansion/changes to the catchment area to reduce children coming in from outside of Wythall.
- A new primary school onsite (but should be delivered before or with early phases of housing).
- Wraparound childcare and nursery provision.
- New secondary school or significant, funded expansion to Woodrush High.

Health

- GP surgery expansion, or merging between new surgeries.

Rail station/integrated transport

- Continuous active-travel network linking Wythall and Whitlocks End stations.
- Increased train frequency (hourly service considered inadequate).
- Platform extensions.
- Improved, more frequent bus services, including links to Maypole, Solihull and Redditch.
- Integration of bus–rail services.

Local centre

- New or expanded local centre, potentially hosting a school, GP and shops.

Cross-boundary infrastructure improvements/coordination

- Coordination with Solihull and Birmingham to address cumulative impacts.

Statutory Consultees and Other Stakeholders

Statutory Consultees and Other Stakeholders:

Settlement-wide – Key Points

NHS – Herefordshire and Worcestershire Integrated Care System

Core message: New housing in Bromsgrove District will significantly increase demand on healthcare services. Without developer-funded mitigation, health services will be unable to cope, making development unsustainable.

No detailed Wythall-specific comments received.

Solihull MB Council

- Wythall contains three potential housing allocation sites totalling 1,235 homes.
- These sites are near the Solihull boundary and may impact:
 - Shirley highway network
 - A435 corridor congestion
 - Solihull education services
 - Solihull healthcare services
- SMBC expects detailed, coordinated cross-authority planning for:
 - Transport mitigation
 - School place planning
 - Healthcare infrastructure provision

Stratford on Avon District Council

- Bromsgrove is proposing three site allocations in Wythall: WY01, WY02, WY03. These sites lie very close to Stratford-on-Avon District.
- SoADC is concerned that development here could:
 - Increase pressure on the A435
 - Cause wider impacts on the highway network across district boundaries
- SoADC is asking Bromsgrove to more fully consider cross-boundary infrastructure impacts when planning these allocations.

Warwickshire County Council

Note potential housing allocations at Wythall:

- By themselves, housing allocations of this scale may not lead to unacceptable increases in traffic flows on the A435 corridor and other local roads in Warwickshire.
- Should proposals for major strategic employment allocations also be located in the vicinity, Warwickshire CC would request that their impacts be assessed cumulatively in the Worcestershire Countywide Strategic Traffic Model (WCSTM), alongside any housing allocations which may also affect the corridor, e.g. sites WY01, WY02 and WY03.
- Would welcome the opportunity for joint working with strategic transport planning colleagues at Worcestershire County Council to agree the terms of reference for any strategic or more detailed transport assessment work which may be required.

WCC Education

Wythall: Based on consultation for 1235 dwellings in Wythall

- Relevant schools: Meadow Green Primary, Woodrush Community High.

Statutory Consultees and Other Stakeholders:

Settlement-wide – Key Points

- Pupil requirements generated by proposed development: Early Years = 137 Full Time Equivalent, Primary = 61 Per Year Group (PYG), Secondary = 49 PYG.
- New provision required: Primary = 2.1 Form Entry (FE) Expansion depending on feasibility, Secondary = 1.7 FE expansion not likely to be feasible - space.

WCC Planning and Transport Planning

Rail:

- Any development of nearby car parking facilities and improvements in active travel provision at the station should be welcomed
- 1,235 houses is not insignificant and WMRE have stated that they would look to increase the peak 2 trains per hour to an all-day offering, which is positive

Statutory Consultees and Other Stakeholders:

WY01 – Key Points

National Grid Electricity Distribution (South West) Plc

- WY01 is directly affected by major National Grid infrastructure, specifically:
 - The Longbridge 132kV overhead circuit
 - Five pylons located within the site boundary
- Development must be designed around the pylons, not rely on diversion.
- Masterplanning must integrate the overhead line corridor as:
 - Open space
 - Green/blue infrastructure
 - BNG opportunities
- NGED supports allocation only if the Local Plan policy explicitly recognises and safeguards this infrastructure.

Natural England

Natural England are happy with the allocation and that it does not have an impact on any protected sites/landscapes nearby

North Worcestershire Water Management

Flood risk & water environment

- Located in Flood Zone 1.
- EA does not model the tributary of the River Cole that flows along the southern boundary, meaning actual flood risk may be higher.
- National modelling shows the eastern boundary, next to the railway, is at high surface water flood risk, with potential depths up to 1.2m.
- No recorded flood incidents for the parcel, but nearby reports exist; lack of internal records does not confirm absence of past flooding.
- Watercourses, ditches and ponds on site must be retained and given a suitable undeveloped buffer.

SuDS & Drainage

- Must follow 2025 Defra National SuDS Standards, including:
 - Rainwater harvesting
 - Above-ground SuDS

Statutory Consultees and Other Stakeholders:

WY01 – Key Points

- Water quality treatment
- If phased, an overall SuDS plan is required.
- Infiltration SuDS may not be viable due to impeded drainage; site-specific ground investigations are required.

Ecology & BNG

- The watercourse bordering WY01 is classified as high distinctiveness and requires a River Condition Assessment by an accredited surveyor.
- The 10m riparian zone must be included in BNG calculations, and riparian encroachment must be avoided.
- BNG units for the watercourse and ponds are expected to be delivered on site.
- The site contains the Shaw Brook, and green corridors along watercourses should be incorporated into the design.
- A requirement is suggested for the management of invasive non-native species, particularly Himalayan Balsam.

WCC Planning and Transport Planning

Landscape:

Proposed allocation in particular development that will impact upon significant and distinctive landscape features: a field pattern of small pasture fields enclosed by substantial hedgerows. This is a landscape character that is uniquely part of the north-east Worcestershire landscape and should be considered significant. It will be important to ensure the allocations are developed from a landscape-led perspective to integrate within the established landscape framework.

Ecology:

- Development should incorporate large, contiguous areas of habitat, suitable for Green Infrastructure or a country park-scale provision.
- The Local Nature Recovery Strategy (LNRS) indicates opportunities for:
 - Species-rich neutral grassland
 - Habitat mosaic
 - Riparian habitat
- The site is adjacent to ancient woodland (an Irreplaceable Habitat).
 - A minimum 15m buffer is recommended along the central southern boundary to prevent impacts from artificial light, urbanisation and increased footfall
- Design should support on-site Biodiversity Net Gain (BNG) requirements.

Worcestershire Regulatory Services

Contaminated Land:

The site contains numerous potential contaminated land features largely referred to as unknown infilled ground features that look to comprise ponds. A former brickworks is located adjacent to the western boundary which is a potential source of landfill gas, a former landfill is shown adjacent to the eastern boundary, a pit to the northeast, and Little Truemans Heath Farm (Landfill) further to the northeast. The western and eastern portions of the site fall within the buffers for the various landfills.

Nuisance/Noise:

The timber yard on the western boundary is a potential noise source and an acoustic assessment including mitigation measures will be required along with good acoustic design for that side of the development.

Air Quality:

No adverse comments

Statutory Consultees and Other Stakeholders:

WY01 – Key Points

Worcestershire Wildlife Trust

- WY01 overlaps with grassland parcels that may be unimproved, according to the Worcestershire Habitat Inventory. If surveys confirm these are priority habitats, this would constrain the developable area and may limit or prevent allocation.
- Additional surveys are required before confirming the site's suitability, including:
 - Habitat quality
 - Protected species presence
 - Potential ecological connectivity
- Any development at WY01 must include robust, high-quality Green and Blue Infrastructure (GI/BI), such as: GI should:
 - Buffer habitats
 - Manage recreational pressure
 - Deliver biodiversity net gain
 - Incorporate climate-resilient SUDS
- Considerations such as noise, light, pollution, and recreational pressure will need further investigation to understand WY01's development capacity. Effects may influence layout, developable land, and required mitigation.

Statutory Consultees and Other Stakeholders:

WY02 – Key Points

Natural England

Natural England are happy with the allocation and that it does not have an impact on any protected sites/landscapes nearby

North Worcestershire Water Management

Flood risk & water environment

- Located in Flood Zone 1.
- EA does not model the tributary of the River Cole (Shaw Brook) that flows through the site, meaning actual flood risk may be higher and further fluvial modelling is required.
- National modelling identifies extensive surface water flow paths through the site, linked to the Shaw Brook, ponds, and ditches.
- No recorded flood incidents within the site, but nearby flooding has been reported. The absence of data does not confirm the site has never flooded.
- Watercourses, ditches and ponds on site must be retained and given a suitable undeveloped buffer.

SuDS & Drainage

- Must follow 2025 Defra National SuDS Standards, including:
 - Rainwater harvesting
 - Above-ground SuDS
 - Water quality treatment
- If phased, an overall SuDS plan is required.
- Infiltration SuDS may not be viable due to impeded drainage; site-specific ground investigations are required.

Statutory Consultees and Other Stakeholders:

WY02 – Key Points

- Any redundant culverts in the ditch network should be removed.

Ecology & BNG

- The Shaw Brook and associated watercourses are likely to be high distinctiveness features requiring a River Condition Assessment completed by an accredited surveyor.
- The 10m riparian buffer zone must be included in BNG calculations; riparian encroachment must be avoided.
- BNG units for watercourses, ditches, and ponds are expected to be delivered on site.
- Strong recommendation to include green corridors along the watercourses including the River Cole tributary.
- Requirement to manage invasive species, particularly Himalayan Balsam, which is prevalent locally.

WCC Planning and Transport Planning

Ecology:

- Development should include:
 - Habitat mosaic (PM23)
 - Riparian buffer (PM02) along the southern and south-eastern edges
- These measures are needed to protect the adjacent Grassland Inventory site (Grimes Hill Meadow) (PM42).
- Urbanisation risks must be mitigated to avoid deterioration of this important grassland.
- WCC recommends: A botanical condition survey of Grimes Hill Meadow as part of baseline ecology work, to enable future monitoring and assess whether mitigation is effective.

Worcestershire Regulatory Services

Contaminated Land:

The site is located within numerous landfill buffers (possible gas migration zone) for a number of former quarries and landfill sites. These are referred to as Little Truemans Heath Farm (Landfill) ref 14/01114/EA, Wythall Sand And Gravel (Landfill) ref 14/01113/EA, Moat House Farm (Landfill) ref 14/01116/EA, and Norton Lane, Wythall Historic Landfill ref 14/00070/PLG. Detailed gas risk assessment would be required for this site as part of contamination risk assessment. Railway land is also present along the eastern boundary.

Nuisance/Noise:

Railway line runs along eastern boundary of site which will require an acoustic assessment of impact and mitigation but unlikely to affect development.

Air Quality:

No adverse comments

Worcestershire Wildlife Trust

- WY02 contains grassland parcels that may be unimproved, as indicated by the Worcestershire Habitat Inventory. If surveys confirm these grasslands are priority habitat, they would restrict or reduce the developable area and may constrain the viability of the allocation.
- There is currently insufficient ecological evidence to determine suitability. Updated habitat surveys are required to:
 - Confirm habitat condition
 - Identify any protected species
 - Establish ecological connectivity and constraints
- Any development at WY02 must deliver robust, high-quality Green and Blue Infrastructure (GI/BI). GI should:
 - Buffer sensitive habitats
 - Manage and reduce recreational pressure

Statutory Consultees and Other Stakeholders:

WY02 – Key Points

- Support biodiversity net gain
- Incorporate climate-resilient SUDS
- Issues such as noise, light, runoff pollution and recreational disturbance may influence the layout and developable land within WY02. These impacts need to be assessed before confirming any development capacity.

Statutory Consultees and Other Stakeholders:

WY03 – Key Points

Natural England

Natural England are happy with the allocation and that it does not have an impact on any protected sites/landscapes nearby

North Worcestershire Water Management

Flood risk & water environment

- Located in Flood Zone 1, but an area of higher fluvial flood risk (Zones 2 & 3) is present along the River Cole in the south-east corner of the site.
- National modelling identifies a well-defined surface water flow path within the site, linked to a network of ditches and ponds.
- No internal flood records exist, but there are reports of flooding in the wider vicinity; lack of records does not confirm the site has never flooded.
- All watercourses, ditches and ponds must be retained and given a suitable undeveloped buffer.
- **SuDS & Drainage**
- Must follow 2025 Defra National SuDS Standards, including:
 - Rainwater harvesting
 - Above-ground SuDS
 - Water quality treatment
- If phased, an overall SuDS plan is required.
- Infiltration SuDS may not be viable due to impeded drainage; site-specific ground investigations are required.

Ecology & BNG

- The watercourses within and next to the site are considered high distinctiveness features, requiring a River Condition Assessment undertaken by an accredited surveyor.
- The 10m riparian buffer zone must be included in BNG calculations; riparian encroachment must be avoided.
- BNG units for watercourses, ditches, and ponds are expected to be delivered on site, with redundant culverts removed where present.
- Strong recommendation to include green corridors along the watercourses including the River Cole tributary.
- Requirement to manage invasive species, particularly Himalayan Balsam, which is prevalent locally.

Sport England

Site WY03 is adjacent a golf course, Sport England would recommend that a design requirement for the site allocation is that the development shall integrate effectively with the adjacent golf course. Where the operation of the existing course could have a significant adverse effect on new development in its vicinity, the applicant (or 'agent of change') is required to provide suitable mitigation before the development has been completed.

Statutory Consultees and Other Stakeholders:

WY03 – Key Points

WCC Planning and Transport Planning

Landscape:

Proposed allocation in particular development that will impact upon significant and distinctive landscape features: a field pattern of small pasture fields enclosed by substantial hedgerows. This is a landscape character that is uniquely part of the north-east Worcestershire landscape and should be considered significant. It will be important to ensure the allocations are developed from a landscape-led perspective to integrate within the established landscape framework.

Ecology:

- The existing copse within the site should be retained.
- A surrounding halo of habitat mosaic should be created to strengthen ecological connectivity and support BNG.
- The site borders the River Cole Local Wildlife Site (LWS).
- A substantive 50m buffer (PM42) is recommended in the southern tip to protect the LWS from:
 - Construction impacts (dust, noise, litter, light)
 - Operational impacts (artificial light at night, recreation pressure, urbanisation).

Worcestershire Regulatory Services

Contaminated Land:

The site contains a number of small unknown filled ground features which appear to former ponds. Railway is present adjacent to the eastern boundary. The north easter corner of the site falls within the landfill buffer for Wythall Historic Landfill ref 14/00070/PLG.

Nuisance/Noise:

Railway line runs along eastern boundary of site which will require an acoustic assessment of impact and mitigation but unlikely to affect development.

Air Quality:

No adverse comments

Worcestershire Wildlife Trust

- WY03 overlaps with grassland parcels that may be unimproved, according to the Worcestershire Habitat Inventory. If surveys confirm these are priority habitats, this will constrain the developable area and may limit the suitability of the site for allocation.
- Up-to-date habitat surveys have not yet been undertaken for the site. Additional surveys are needed to:
 - Confirm the status of grasslands
 - Identify protected species
 - Assess ecological connections or sensitivities
- WY03 must incorporate robust Green and Blue Infrastructure (GI/BI). GI should:
 - Protect and buffer sensitive habitats
 - Manage recreational impacts
 - Deliver biodiversity net gain
 - Include well-designed SUDS to manage water effectively
- Factors such as noise, light pollution, run-off, and increased recreational pressure will require investigation. These may influence both the extent and layout of development within WY03.

Developers/Landowners

Developers/Landowners:

WY01 Site Promoters – Key Points

Savills obo Bellway Strategic Land (Site 203)

- Bellway fully supports WY01 being identified as a draft housing allocation for 875 dwellings, arguing it is: a highly sustainable settlement (ranked 4th in the District); in close proximity to rail connections, bus routes and the M42; and is well positioned on the edge of the West Midlands conurbation.
- The site would help meet Bromsgrove LHN, support the Council's strategic purposes and deliver high levels of biodiversity net gain.
- The site makes only a limited contribution to the Green Belt and indeed meets the NPPF definition of Grey Belt, therefore being suitable for release.
- Technical constraints on the site are limited and manageable with there being no red rated constraints.
- Site can support infrastructure improvements and can deliver quickly once planning permission is granted.
- Support the Council's intention to carry out updated Green Belt assessment work using updated NPPF definition and assessment of smaller parcels.

Developers/Landowners:

WY02 Site Promoters – Key Points

Turley obo Gallagher Developments (Site 313a)

- Recommend the Council extend the plan period to 2045 to ensure that, upon adoption, the new local plan can cover a minimum 15-year period.
- Encourage the Council to prioritise the work required under paragraph 24 of the 2024 NPPF (duty to cooperate) by coming to an agreement to address the likely unmet need coming from Birmingham and other neighbouring authorities.
- The Council's evidence base supports the view that Wythall is an appropriate location for growth. Wythall scores as the fourth highest settlement at Appendix A of the Settlement Hierarchy Review, confirming that it is a suitable location for growth.
- Evidence in the STA also supports this location as a very sustainable option for growth and the site scores green in the Council's site assessment process.
- Support the allocation of WY02 but propose an expanded boundary for the allocation to include land in same ownership immediately to the north. Also propose that density across the site can be increased and allocation can be for 120 dwellings alongside significant open space provision.
- Limited technical constraints to deliver the site and can be delivered early in the plan period.
- Support delivery of concurrent infrastructure improvements such as active travel routes and better connections to railway stations in the vicinity.

Developers/Landowners:

WY03 Site Promoters – Key Points

Nexus Planning obo Lone Star Land Ltd (Site 169)

- Support the proposed allocation of WY03 which is viable, deliverable and has early delivery potential. Also support identification of Wythall as a sustainable location for growth, which is in fact well positioned to accommodate significantly more development than currently proposed.
- Settlement Hierarchy review omits a dental practice in Wythall which should therefore increase the settlement's sustainability score.
- Overall housing need in DDS is underestimated as full 18 year plan period not accounted for (12,867 rather than 12,155). BDC should also be contributing to GBBCHMA unmet need and plan for above minimum housing numbers due to severe affordability issues. A 10% buffer should also be applied to ensure flexibility and maintain a 5YLS.
- Question the plan's reliance on major allocations such as FRA01 and BRM01.
- Site being proposed is justified in classification as Grey Belt and any technical constraints on site are limited and manageable.
- The Council's vision should do more to recognise pressures from the West Midlands conurbation.

The summaries below are from site promoters who represent sites submitted for consideration that were not presented as preferable for allocation in the consultation document. Comments tend to challenge the housing number or raise concerns regarding the delivery of the potential site allocations in order that additional/alternative sites (their sites) be included for allocation as the plan progresses.

Developers/Landowners:

Settlement-wide (other Wythall Site Promoters) – Key Points

Donna Griffin (Landowner) (Site 197)

- While the site was previously excluded from planning consideration due to its green belt designation and perceived separation from the settlement boundary, recent developments appear to shift that context.
- Plot 195, which adjoins plot 197, has now been accepted as grey belt and granted planning consent. This change seems to address the earlier concerns, as plot 197 is now directly connected to the settlement.
- The land itself presents minimal constraints and forms part of a larger, well-connected area. Considering the proximity and alignment with plot 195, there may be merit in viewing the two plots together as part of a coherent and practical development opportunity.

Andrew Moseley (Site 342)

- The site provides an ideal location for infill development, it is not entirely greenfield and has many commercial buildings in need of development/rebuilding. Whilst other sites nearby are said to be too far away from current development, our site is next door to the new Parish Council Office which has been deemed suitable for the development of a 'Vibrant community hub'. We are happy to support the council in this development and have spoken with staff regarding the provision of much needed additional parking for the community hub.

Landmark Planning (Site 124)

- Wythall is identified as a Tier 2 settlement with high levels of services and sustainable transport links, making it a suitable focus for housing growth.
- Local Plans must ensure a sufficient 5-year supply and a mix of sites, including at least 10% below 1 ha. Bromsgrove currently allocates none of these smaller sites. Site 124 (0.78 ha, c. 28 dwellings) provides exactly the type of quick-to-deliver, small, sustainable site the NPPF now prioritises.
- Grey Belt (Annex 2) now allows identification of land within the Green Belt that makes a lesser contribution to its purposes, supporting allocation of small, enclosed parcels such as Site 124.

Developers/Landowners:

Settlement-wide (other Wythall Site Promoters) – Key Points

Pegasus Group obo Catesby Estates (Site 238)

- Vision should be a bespoke spatial planning vision to reflect sustainable development principles, refer explicitly to housing, economy and infrastructure and cover the full plan period.
- The proposed plan period is too short as will not allow for required 15 years post adoption. It also cannot accommodate strategic sites such as FRA01 which could require a 30 year period for full delivery.
- The standard method is a minimum and DDS must plan for higher level of housing to be positively prepared. Evidence shows a large unmet need in GBBCHMA and Redditch, which BDC has a legal duty to help with unmet needs.
- The Council's housing land supply figures are flawed as based on outdated evidence, incorrect assumptions on deliverable sites, and a windfall allowance miscalculation.
- Option A growth option is partially supported as performs best in SA. However Option A should also include edge of Birmingham opportunities with more sites required to meet additional need.
- Wythall is seen as highly sustainable location as a Tier 2 settlement with good services and facilities and good public transport options. This site is rated green (preferred) in the Council's own site assessments.

Harris Lamb obo Taylor Wimpey (Site 212)

- Plan period to 2043 may not meet the required 15 years post adoption.
- Overall housing requirement is too low as does not provide for unmet need from the wider HMA (exceeding 73,000 dwellings), has no upward adjustment for affordability, economic growth or improving affordable housing delivery, and does not include a buffer.
- Support focus of growth on larger, sustainable settlements such as Wythall which is well served by services, employment opportunities and public transport. Lying close to Birmingham, it can support both local and regional unmet needs.
- Evidence on Green Belt needs updating to reflect Grey Belt guidance.
- Capacity assumptions based on net developable areas are unrealistic on allocations. Employment land needs are underestimated.
- Safeguarded land should be identified consistent with NPPF para 145, not only around Bromsgrove but also settlements such as Wythall.

Pegasus Group obo Catesby Estates (Site 235)

- Vision should be a bespoke spatial planning vision to reflect sustainable development principles, refer explicitly to housing, economy and infrastructure and cover the full plan period.
- The proposed plan period is too short as will not allow for required 15 years post adoption. It also cannot accommodate strategic sites such as FRA01 which could require a 30 year period for full delivery.
- The standard method is a minimum and DDS must plan for higher level of housing to be positively prepared. Evidence shows a large unmet need in GBBCHMA and Redditch, which BDC has a legal duty to help with unmet needs.
- The Council's housing land supply figures are flawed as based on outdated evidence, incorrect assumptions on deliverable sites, and a windfall allowance miscalculation.
- Option A growth option is partially supported as performs best in SA. However Option A should also include edge of Birmingham opportunities with more sites required to meet additional and unmet need.

Harris Lamb obo Taylor Wimpey (Sites 049 and 332)

- Plan period to 2043 may not meet the required 15 years post adoption. Should be extended by at least 2 years with housing requirement increased proportionately.
- Overall housing requirement is too low as does not provide for unmet need from the wider HMA (exceeding 73,000 dwellings), has no upward adjustment for affordability, economic growth or improving affordable housing delivery, and does not include a buffer (at least 10% recommended).

Developers/Landowners:

Settlement-wide (other Wythall Site Promoters) – Key Points

- Support focus of growth on larger, sustainable settlements such as Wythall which is well served by services, employment opportunities and public transport. Lying close to Birmingham, it can support both local and regional unmet needs.
- Evidence on Green Belt needs updating to reflect Grey Belt guidance.
- Capacity assumptions based on net developable areas are unrealistic on allocations.
- The settlement hierarchy (current BDP2) is outdated.
- Safeguarded land should be identified consistent with NPPF para 145, not only around Bromsgrove and motorway junctions but also settlements such as Wythall.

TwelveTwentyOne Planning obo Real Christmas Trees Ltd (Sites 120a, 120b, 120c)

- Overall housing needs are underestimated as cross-boundary unmet needs from Solihull, Birmingham and the Black Country are not factored in. A more realistic target would be 16-20,000 dwellings over the plan period.
- The site assessment methodology is flawed by giving no weight to sustainability or deliverability and misapplying NPPF/guidance on Green Belt evaluation. Also fails to recognise Grey Belt characteristics identified in recent appeal at Houndsfield Lane, Wythall.
- Sustainability of sites should be viewed in the context of the nearby Whitlocks End train station and planned housing growth in the vicinity in Solihull Borough.

Nexus Planning obo Lone Star Land Ltd (Sites 167, 168 and 170)

- Support the identification of Wythall as a sustainable location for growth, which is in fact well positioned to accommodate significantly more development than currently proposed.
- Settlement Hierarchy review omits a dental practice in Wythall which should therefore increase the settlement's sustainability score.
- Overall housing need in DDS is underestimated as full 18 year plan period not accounted for (12,867 rather than 12,155). BDC should also be contributing to GBBCHMA unmet need and plan for above minimum housing numbers due to severe affordability issues. A 10% buffer should also be applied to ensure flexibility and maintain a 5YLS.
- Question the plan's reliance on major allocations such as FRA01 and BRM01.
- The Council's vision should do more to recognise pressures from the West Midlands conurbation.

Cerda Planning obo Riva Land Group Ltd (Site 224)

- Wythall is one of BDC's most sustainable Tier 2 settlements with strong services and rail access and is therefore an appropriate focus for growth in the DDS. Concentrating development near services and rail (especially Wythall Station) is supported by the Sustainability Appraisal.
- The Local plan should allocate a balanced portfolio of small and medium sites to increase resilience and support an immediate uplift in delivery.
- Infrastructure needs for the local plan should be necessary and proportionate compliant with CIL Reg 122.
- Updated employment needs would be expected to exceed the current 28ha figure – proposed site could provide employment development fronting the A435.
- The Council's HEDNA will need updating to align with standard method.

Cerda Planning obo Riva Land Group Ltd (Site 344)

- Wythall is one of BDC's most sustainable Tier 2 settlements with strong services and rail access and is therefore an appropriate focus for growth in the DDS. Concentrating development near services and rail (especially Wythall Station) is supported by the Sustainability Appraisal.
- Infrastructure needs for the local plan should be necessary and proportionate compliant with CIL Reg 122.
- NPPF places an emphasis on smaller and medium sites.

Stantec obo IM Land (Site 201a and 201b)

Developers/Landowners:

Settlement-wide (other Wythall Site Promoters) – Key Points

- The plan fails build in buffers (5-10%) for supply and does not consider the unmet needs of GBBCHMA. Local plan should increase housing allocations to avoid failing the duty to cooperate.
- Many evidence base documents are out of date including the HEDNA and employment needs analysis. This undermines soundness.
- Green Belt evidence also needs updating to include Grey Belt concept.
- Support a combination of Option A and Option B for the overall development distribution strategy. This should prioritise more sustainable settlements such as Wythall and reduce dependence on major, slow to deliver urban extensions such as FRA01.

Carter Jonas obo Persimmon Homes and EAW Taylor Will Trust (Site 214)

- Local plan should have its own vision that explicitly embraces development and growth and aligns with NPPF.
- Support Option A for distribution strategy and the principle of development on the edge of the West Midlands conurbation. Also supportive of the discounted Option E.
- Acknowledge increased housing demand from standard method but this should be a minimum requirement. BDC has significant unmet housing need due to past under delivery and also may need to assist with unmet needs from Birmingham.
- Employment land should not be arbitrarily added to housing sites; evidence of need is required through an updated HEDNA.
- New IDP is required as well as further Green/Grey Belt assessment following new NPPF/guidance.

Lichfields obo St Philips (Site 199)

- Specific local plan vision is required that acknowledges need to assist with unmet needs of GBBCHMA and aligns with NPPF. Plans must be positively prepared and meet the duty to cooperate.
- In principle supportive of directing growth to Bromsgrove's main settlements and the West Midlands Conurbation, however consider that the Council needs to produce further evidence to support and justify its draft development strategy.
- More evidence required to make the strategy sound, including updated SA, revised HEDNA, updated Green/Grey Belt assessment and further regional unmet housing need analysis.
- Agree with BDC housing need in the local plan arising from standard method but the DDS has no flexibility or headroom in supply and a buffer should be planned for to accommodate delivery delays and unmet need from the GBBCHMA. Based on functional relationships (migration and commuting), BDC should take approximately 9% of the HMA unmet need. BDC may also be required to take RBC's contribution to unmet need in the HMA.
- The DDS fails to address the legally required duty to cooperate.

The following summaries are presented by site promoters for sites where a significant degree of **employment or commercial uses** may be proposed. Some of these sites may be further from the Wythall/Hollywood settlement boundary than other sites summarised above which are proposed for residential development but, subject to further evidence required on employment needs and site suitability, may be considered suitable for allocation in the local plan process.

Developers/Landowners:

Settlement-wide (other Wythall Site Promoters) – Key Points

Bruton Knowles obo Landchain (Site 254)

- DDS meets LHN but does not account for unmet need from neighbouring authorities contrary to NPPF. More land should be allocated including for a buffer on supply.
- Lack of employment allocations in the DDS is unsound even at Reg 18 stage. Site is being proposed for employment land primarily but alternatively residential development.
- Existing evidence such as HEDNA is outdated and does not reflect 85% increase in LHN which will increase local workforce and job requirements. A simple pro-rata basis could increase requirement from 28ha to c.52ha.
- HEDNA identifies that employment growth is constrained by lack of supply and there is a strong demand for industrial and logistics, SME floorspace, and large strategic sites of >25ha.
- Support distribution scenario of Option A for housing as the most sustainable which distributes growth broadly across the district and aligns with transport corridors.
- Wythall is a logical location for further growth and is highly sustainable as well served by transport and local services.
- Site qualifies as Grey Belt and would not undermine the wider Green Belt.

Nigel Gough Associates Ltd obo Educational Charitable Trust (Site BDC316)

- Vision should be narrowed to concentrate only on matters directly to be influenced by the local plan.
- BDC have failed to undertake a proper Green Belt review and therefore doesn't identify this site as Grey Belt which should be released for appropriate development.
- Support distribution strategy Option D particularly development around M42 J3 and the A435. Sites associated with motorway junctions have strategic economic value and the DDS fails to capitalise on this locational advantage.
- Commercial and leisure uses proposed complementary to the existing Rose and Crown building adjacent to the site. Site benefits from existing access to/from the A435.
- The Council's Site Selection Methodology does not align with the distribution scenarios set out in the DDS and the Reg 18 consultation is flawed as it does not include all reasonable alternative strategies which undermines soundness and legality of the consultation.
- Infrastructure requirements must be proportionate and reasonable and Council must not exceed its legal powers.

Nigel Gough Associates Ltd obo Educational Charitable Trust and other clients (Site BDC011 and 216)

- Vision should be narrowed to concentrate only on matters directly to be influenced by the local plan.
- BDC have failed to undertake a proper Green Belt review and therefore doesn't identify this site as Grey Belt which should be released for appropriate development.
- Support distribution strategy Option D particularly development around M42 J3 and the A435. Sites associated with motorway junctions have strategic economic value and the DDS fails to capitalise on this locational advantage.
- The DDS significantly underestimates future employment land needs; 28ha is wholly inadequate as a minimum of 60-70ha will be required to balance housing growth. The plan lacks clear employment land evidence, locational criteria for new sites, and recognition of the full range of employment uses.
- The Council's Site Selection Methodology does not align with the distribution scenarios set out in the DDS and the Reg 18 consultation is flawed as it does not include all reasonable alternative strategies which undermines soundness and legality of the consultation.
- Infrastructure requirements must be proportionate and reasonable and Council must not exceed its legal powers.
- Site proposed is suitable for strategic employment uses including logistics and/or waste recycling and ancillary uses.

Savills obo Riva Land Group (Sites 185 and 216)

- Local plan needs a locally distinct vision committing to meeting Bromsgrove's own housing and employment needs in full and supporting neighbouring authorities with unmet needs.
- BDC employment needs of 28ha is out of date and materially understated as it relies on 2022 HEDNA. This was based on much lower LHN (c.400 dpa) and only assessed needs to 2040 not the full extent of the emerging plan period. Revised need could be c.50ha to 2043.
- Combined unmet employment needs across Birmingham and Black Country FEMAs is c.206ha and Bromsgrove must make a proportionate contribution to this unmet need. The DDS is silent on this issue.
- Support for standalone, strategic employment sites with direct access to strategic road network which aligns with distribution strategy Option D.
- Site Selection Methodology omits detailed assessment of these sites. This should be rectified for next stage of consultation as all identified constraints on site are capable of mitigation.
- Green Belt evidence is out of date and not aligned with 2024 NPPF changes in relation to grey belt identification. Also releasing Green Belt solely for housing without sufficient employment provision would be unsound.
- Site is highly suitable for strategic employment development and capable of multiple access options.

JLL obo IM Properties (Site BDC043)

- Agree with focusing potential housing sites across the district's main settlements, where there are high levels of existing facilities and services. It will be important to ensure that sufficient employment land is also allocated in locations that can provide convenient employment opportunities to future residents and reduce the reliance on out-commuting identified in the HEDNA.
- Whilst IMP agree that more employment land is needed, this should be additional to the selected sites. BDC must allocate sufficient land to meet the district's identified housing *and* employment needs; one should not be discounted to provide for the other, particularly if this leads to a less sustainable pattern of growth.
- The HEDNA published in 2022 is out of date and IM Properties strongly support the District Council's view that an update is needed to inform the plan-making process. IMP expect an updated HEDNA to establish a need for significantly more than the 28 hectares of employment land previously identified.
- Support a combination of the distribution options presented, including new standalone employment sites at strategic network junctions. However, extensions to existing industrial estates and business parks should form a core component of the Development Strategy for Bromsgrove.
- As with housing, it is important to allocate a range of different sized employment sites to support delivery early in the plan period. Strongly support re-allocating Wythall Green Business Park for high quality light industrial uses as recommended in the HEDNA. IMP site would be a modest and logical extension to this existing site.
- An expanded Wythall Green Business Park, encompassing Land at Middle Lane, Wythall, would therefore support the planned housing growth in this location by providing new employment opportunities local to where people live.
- The Green/Grey Belt Assessment should be carried out in accordance with Planning Practice Guidance, which was updated in 2025 to clarify how such reviews should be undertaken.

Conclusion

This document summarises the consultation responses in relation to the settlement and the potential sites for allocation (edged in blue on the above map) only. It highlights areas of concern associated with potential development allocations in and around this settlement, that have been voiced through the consultation process. Comments made relating to other submitted sites (edged in black on the above map) have been used to inform the wider settlement issues.

Further work still needs to be undertaken, which includes but not limited to:

- Continued analysis of all representations received,
- Additional evidence collection,
- Further Consideration of alternative sites for potential allocation.
- Follow up and clarification of required infrastructure provision to support future development options.