



**Bromsgrove**  
District Council  
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# **Bromsgrove District Local Plan**

**Topic Paper:**

## **Exceptional Circumstances for Green Belt Release**

**April 2025**

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# 1. Background

## 1.1 Introduction

1.1.1 This Topic Paper forms part of the evidence base for Bromsgrove District Council's emerging Local Plan for the period up to 2043. It has been produced to support the plan-making process and sets out the case to justify that exceptional circumstances exist within the district for the release of Green Belt land to meet housing and employment development needs.

## 1.2 Green Belt in Bromsgrove District

1.2.1 Bromsgrove district is situated in north Worcestershire and is predominantly rural with around 89% of the land designated as Green Belt. The main centre of population in Bromsgrove district is Bromsgrove Town with other larger settlements at Alvechurch, Barnt Green, Catshill, Hagley, Rubery and Wythall. All of these settlements are excluded from the Green Belt, with their boundaries being tightly drawn around the existing built form. There is a series of smaller rural villages and hamlets spread throughout the district, which are predominantly washed over by Green Belt. The exceptions to this are Blackwell, Cofton Hackett, Lickey End, Major's Green and Stoke Prior, which are inset from the Green Belt.

# 2. Planning Context

## 2.1 National Planning Policy Framework (NPPF) (Dec 2024)

2.1.1 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF para. 142).

2.1.2 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified as part of the plan-making process (NPPF para. 145). The latest version of the NPPF clearly states that exceptional circumstances include instances where an authority cannot meet its identified need for homes, commercial or other development through other means (para. 146); this is the case facing Bromsgrove District Council. In order to meet these development needs in full, local authorities should review Green Belt boundaries and propose boundary alterations.

2.1.3 Paragraph 147 of the NPPF sets out the process that local authorities should follow in order to conclude that exceptional circumstances exist to justify changes to Green Belt boundaries. The strategic policy-making authority should be able to demonstrate that it has fully examined all other reasonable options for meeting its identified development needs. This will be assessed through the examination of its strategic policies and based on whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

## 2.2 Adopted Bromsgrove District Plan (2017)

2.2.1 The current Bromsgrove District Plan was adopted in January 2017 and was scrutinised at Examination over the preceding two and a half years. The Council proposed a housing requirement of 7,000 dwellings over the duration of the plan period (up to 2030), with a total of 4,700 dwellings being allocated at that time on non Green Belt land. It was proposed to undertake a review of the Green Belt by 2023 in order to identify sufficient land for the remaining 2,300 dwellings and to consider the shortfall of housing need that had arisen in the West Midlands conurbation. The availability and suitability of land to contribute towards the 7,000 dwelling requirement was documented in the Strategic Housing Land Availability Assessment (SHLAA)<sup>1</sup> and submitted as evidence to the Examination. The findings of that document conclude: *“The figures in table 8 clearly show that there is potential to deliver a significant number of homes in the next 10 years however this is not case beyond 2023. When including completions during the first 2 years of the plan period (386) the total capacity to 2030 is 4,624. This leaves a maximum shortfall of 2,376 if the total of 7,000 homes is to be reached by 2030. A full Green Belt Review will therefore be necessary to identify sites for the last 7 years of the plan period.”* (p.17).

2.2.2 Having considered the argument for the release of Green Belt land to meet housing needs, the Inspector responded in his Report (December 2016)<sup>2</sup> as follows:

### *“Housing Requirement*

*33. Notwithstanding the above, the Council wishes to retain the figure of 7,000 dwellings as the Local plan housing requirement. In the Council’s view, the additional 350 dwellings (approximately) will provide greater flexibility in housing provision consistent with the Framework’s aim of boosting significantly the supply of housing, as well as including an additional element for affordability. I have no reason to take a different view. Bearing in mind the presence of significant constraints to development in both the BDP and BORLP4 areas (as discussed elsewhere in both reports) I consider that the adoption of this figure represents, in principle, positive planning in line with paragraph 157 of the Framework. However, the Plan as submitted does not seek to allocate land to deliver this full amount of housing: provision is only made for some 4,700 dwellings, with the remainder to come forward through a Green Belt Boundary Review (GBBR). The Council also acknowledges that additional provision will be required to meet the needs of the West Midlands conurbation. I now turn to address these matters.”*

2.2.3 The Inspector goes on to address the Approach to Meeting Future Housing Needs and the Housing Land Supply. He concludes:

*“44. Taking these matters together, I am satisfied that the Council’s revised assessment is robustly based. The Council proposes changes to update the Plan in this regard [MM14-19]: these are needed in order to be effective and justified. Clearly, as already discussed, there remains a*

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<sup>1</sup> [SHLAA fc 20-07-12 \(bromsgrove.gov.uk\)](#)

<sup>2</sup> [Final Bromsgrove Development Plan Inspectors Report](#)

*substantial shortfall between the identified supply and the overall housing requirement that will need to be addressed by the proposed GBBR and Local Plan Review.”*

2.2.4 This conclusion clearly indicates that Bromsgrove District cannot fulfil its development needs without looking to land currently designated as Green Belt.

## 2.3 Emerging Bromsgrove District Local Plan

2.3.1 Through the emerging Local Plan, the Council will need to allocate enough land for 12,155 dwellings to meet the district’s Local Housing Need (LHN) and potentially 28 hectares of employment land for manufacturing and warehousing, as well as identifying opportunities for office space. Alongside which, there is a need to ensure that provision is made for sufficient services, facilities and other supporting infrastructure. The LHN for Bromsgrove district is 715 dwellings per annum (dpa). The Council has allowed for a 17 year Plan period to ensure 15 years post adoption as specified in the NPPF (para 22). Therefore, given that the plan-making process is now considering an extended plan-making period beyond 2030, the Council will need to find more land within the Green Belt than was originally required to satisfy the 2,300 dwelling shortfall identified in the adopted Plan.

2.3.2 Whilst plan timeframes and methods for calculating development needs have moved on since the Bromsgrove District Plan was adopted, the development limitations for a district constrained by tightly drawn Green Belt boundaries have not. Therefore, as a starting point, the Council considers that the conclusion reached by the Inspector in his Report (December 2016) provides a robust foundation on which to build a case for exceptional circumstances to justify the release of Green Belt land for development.

2.3.3 Furthermore, to support the process of releasing land from the Green Belt, a Green Belt Study (June 2022)<sup>3</sup> has been undertaken, which forms part of the emerging Plan’s evidence base. The Study was undertaken to provide an independent assessment of the ‘harm’ of releasing land from the Green Belt for development as opposed to identifying which land should be released for that purpose. The ‘harm’ of releasing land from the Green Belt is one of many considerations taken into account when identifying land for development needs. This process is described in the Site Assessment and Site Selection Methodology<sup>4</sup>.

2.3.4 The tables below set out the current commitments on non Green Belt land that will count towards meeting development needs. The component parts that contribute towards the current commitments figures can be found in the Council’s Housing Land Supply document and the Authority Monitoring Report<sup>5</sup>.

<b>Housing Commitments at 1 April 2024</b>	<b>Capacity (dwgs)</b>
Sites with planning permission	2240
Vacant sites allocated in current Bromsgrove District Plan	120
Windfall Allowance	640
Sub Total:	3,000
Requirement (LHN):	12,155
<b>Shortfall to be allocated on land currently designated as Green Belt:</b>	<b>9,155</b>

<sup>3</sup> This can be viewed on the Evidence Base page of the Council’s website or via the Commonplace consultation platform

<sup>4</sup> This can be viewed on the Evidence Base page of the Council’s website or via the Commonplace consultation platform

<sup>5</sup> [Monitoring Documents](#)

The method for calculating LHN was altered in the NPPF in December 2024, which was two years after the Council's Housing and Economic Development Needs Assessment (2022) (HEDNA) was published. At this point, the number of dwellings needed to be accommodated in the district up to 2043 almost doubled. Therefore, the 28 hectares of employment land identified in the HEDNA may not be sufficient as that figure was aligned to the previously lower LHN figure. An update of the HEDNA will need to be undertaken, however this will not be undertaken until there is a firm timetable for progressing through the new plan-making process. This will ensure that the evidence documents are as up to date and robust as possible.

<b>Employment Commitments at 1 April 2024</b>	<b>Capacity (ha)</b>
Sites with planning permission	6.5
Vacant sites allocated in current Bromsgrove District Plan	7
Sub Total:	13.5
Potential Requirement:	28
<b>Shortfall to be allocated on land currently designated as Green Belt:</b>	<b>14.5</b>

## 3. Assessment of Exceptional Circumstances

### 3.1 Use of brownfield sites and underutilised land

3.1.1 The Council undertook a Call for Sites exercise in 2019 and received over 400 site submissions. This list has been added to since the original exercise was undertaken and the number of sites has increased to around 450. Of the 450 sites that were assessed for their development suitability, only 26 were classed as brownfield sites. Eight sites were discounted for various reasons as part of the Site Assessment process (See Appendix 1).

3.1.2 Of the remaining 18 sites, 14 were not in the Green Belt and 12 of which have been included in the housing and employment commitments above. There is some uncertainty regarding the availability of the remaining two sites, which requires further investigation. The potential housing capacity is eight dwellings.

3.1.3 Of the 10 brownfield sites located in the Green Belt, six were discounted for various reasons as part of the Site Assessment process. Of the remaining four sites, two have recently secured planning permission (one on appeal) and will count towards existing commitments. Of the remaining two sites, their combined capacity is 16 dwellings, however, they are not in locations close to key settlements in the district. Their suitability to align with the final development distribution strategy will be considered in the future.

3.1.4 In terms of contributions to the LHN, the estimated capacity of appropriate brownfield sites is around 170 dwellings, which makes a limited contribution to the existing commitments figure above.

3.1.5 The Council considers that it is able to demonstrate exceptional circumstances against criterion a) of NPPF paragraph 147.

### 3.2 Optimising density

3.2.1 With respect to housing development, the NPPF (paras 129 and 130) advocates an approach to development that makes efficient use of land. The level of development on sites should be maximised

without compromising the quality of the housing development or compromising the character and local distinctiveness of an area. Density is an outcome of the design process and not a determinant.

3.2.2 Local Policy BDP7 Housing Mix and Density states: “BDP7.2 The density of new housing will make the most efficient use of land whilst maintaining character and local distinctiveness and therefore should fully accord with BDP19 High Quality Design.” Policy BDP19(e) ensures that the diverse range of local character and distinctiveness is enhanced by new development.

3.2.3 Having considered this matter at the Examination in Public, the Inspector reflects on this approach in his Report as follows:

“Housing Mix and Density

*117. Policy BDP7 requires development proposals to take account of identified housing needs in terms of the size and type of dwellings. While a focus on 2 and 3 bedroomed properties is identified, I am satisfied on balance that the policy contains sufficient flexibility and is not unduly prescriptive. Clearly, it is necessary that appropriate account is taken of local character and distinctiveness. The Council proposes a change to clarify that a wider mix of dwelling types may be required on schemes of 10 or more dwellings [MM53] and I agree that this is needed for reasons of effectiveness.”*

3.2.4 In terms of the large site allocations detailed in Policy BDP5B of the Local Plan, all have secured planning permission or development has been completed, with the exception of one site at Frankley. This means that there is no opportunity to increase density levels on these sites, which could reduce the amount of Green Belt land required to meet the current LHN.

3.2.5 The Council needs to be mindful that the whole of a site may not be suitable for development and an allowance for infrastructure provision, open space etc within a site boundary needs to be made. Therefore, when assessing sites that could contribute towards the LHN, net developable areas will be used with a density multiplier to establish initial site capacity figures. The criteria for determining net developable areas are shown below:

Net Developable Areas	
Site Size (ha)	Developable Area of Site
Less than 0.4	100%
0.4 to 2	85%
Greater than 2	65%

3.2.6 By way of comparison, an analysis of density levels achieved across the sites referenced in paragraph 3.2.4 is detailed at Appendix 2. The above table has been used to determine a net developable area for each site and its achieved yield used to determine density. The density of the sites ranges from 20 dwellings per hectare (dph) to 53dph. This does indicate that a flexible approach to density has been achieved in line with both Local Plan policy and the Inspector’s findings. To take these findings one step further, purely as a mathematical exercise, the yield for each site was increased to identify potential impacts on site density. A range of 10% to 25% was applied to achieved yields, which pushed site densities to between 22dpa to 67dpa. Whilst, in reality some of these densities would be too high in some locations, it does indicate that there may be an opportunity to increase some density levels in the emerging Local Plan.

3.2.7 It should be noted that if a 25% increase in site yield had been applied to all of these sites, in theory an additional 666 dwellings could have been accommodated. This does not take account of local character and distinctiveness and is purely a mathematical approach to optimising density. However, an additional 666 dwellings would not negate the need to identify Green Belt land to meet the LHN figure.

3.2.8 The Council considers that it is able to demonstrate exceptional circumstances against criterion b) of NPPF paragraph 147. However, the theoretical density levels demonstrated at Appendix 2 indicate that there may be an opportunity to specify density ranges across the district in emerging policies. The current NPPF offers more detail in this regard than was available in the NPPF (2012) under which the previous Local Plan was prepared.

### 3.3 Discussions with neighbouring authorities and the Duty to Cooperate (DtC)

3.3.1 Bromsgrove District Council shares an administrative boundary with eight other local authorities: Birmingham City Council, Dudley Metropolitan Borough Council, Redditch Borough Council, Solihull Metropolitan Borough Council, South Staffordshire Council, Stratford on Avon District Council, Wychavon District Council, and Wyre Forest District Council. Bromsgrove District Council not only sits within Worcestershire County, but it is also a member of the Greater Birmingham and Black Country Housing Market Area and therefore has spatial links beyond its immediate administrative boundaries.

3.3.2 Following publication of its Housing and Economic Development Needs Assessment (HEDNA), the Council engaged with its neighbouring authorities to ask, amongst other things, whether they had capacity to meet any of Bromsgrove district's unmet development needs (Appendix 3). Although local authorities were at different stages of plan-making, it was clear from their responses that similar plan-making challenges were a common occurrence in terms of meeting their own development needs, and no authorities were able to assist.

3.3.3 Whilst the Council, in its letter dated 27 June 2022, sets the scene for its unmet development needs, based on the published HEDNA (2022), it is acknowledged that this document will require updating before the emerging Plan is submitted for Examination. The question posed relating to acceptable levels of development as detailed in the HEDNA has been superseded by the revision to the Standard Method for calculating Local Housing Need (December 2024). The LHN has increased from 383 dpa to 715 dpa, thus exacerbating the need for additional land for development. It has been assumed that neighbouring local authorities are as equally unlikely to be able to accommodate any of Bromsgrove district's development needs based on such an increase in the LHN figure.

3.3.4 The Council continues to engage with its neighbouring authorities. Examples of continued and ongoing engagement includes:

- Monthly meetings of the GBBCHMA members;
- Participation in GBBCHMA commissioned evidence base studies relating to housing and economic growth;
- Ongoing Statements of Common Ground;
- Invitation to comment on upcoming Bromsgrove District Local Plan Draft Development Strategy consultation scheduled for summer 2025

3.3.5 The Council considers that it is able to demonstrate exceptional circumstances against criterion c) of NPPF paragraph 147.

## 4. Conclusion

This Topic Paper has set out the exceptional circumstances that exist to justify release of land from the Green Belt in Bromsgrove district in order for the Council to meet its development need obligations in accordance with the NPPF and the PPG. The Council considers that it has built a firm foundation at this early stage in the plan-making process for continued and ongoing dialogue with its neighbouring authorities, which demonstrates that the Plan is being positively prepared in meeting development needs.

## Appendix 1: Brownfield Sites – site assessments analysis

InitialREF	Site Name	Nearest Settlement	Area (ha)	Assessment outcome	GB?	Yield	HSG?
025	19 Druids Lane and garages	Druids Heath (BCC)	0.28	Could be considered for allocation, but may not fit with development strategy	Y	8	Y
030	Willowbrook Garden Centre, Stourbridge Road	Catshill	2.55	Discounted as site falls within a High Landscape Sensitivity Area for employment.	Y		N
042	2 Dodford Road	Bournheath	0.19	Planning permission granted	Y	1	Y
344	Wythall Green Business Park, Middle Lane	Wythall	17	Could be considered for continued employment allocation	N		N
087	Land to the east of Redditch Road	Hopwood	1.26	Appeal allowed	Y	34	Y
117	Barberry House, Stourbridge Road	Bell End	0.34	Discounted due to the site's relative isolation and limited capacity potential	Y		Y
135	The Old Brickworks, Kiln Court, Scarfield Hill	Alvechurch	2.58	Discounted. Likely land contamination, Priority Habitat, concerns over accessibility across narrow canal and railway bridges	Y		Y
141	The Birches, 98 New Road	Bromsgrove	0.33	Could be considered for allocation, but could come forward at any time as not in GB	N	10	Y
192	Land at Bordesley Park Farm, Dagnall End Road	Redditch	1.33	Discounted due to the significant potential for historic environment impact	Y		Y
264	Land at Sugarbrook Nurseries	Stoke Pound	1.64	Discounted as site falls within a High Landscape Sensitivity Area for employment.	Y		Y
280	Marlbrook Quarry, Alvechurch Highway	Marlbrook	21.1	Development of the site would lead to 'Very High' Green Belt harm	Y		Y
BDC013	86-96 Worcester Road	Bromsgrove	0.61	Part of site TC10 in adopted Plan	N		N
BDC045	RMC House, Church Lane	Bromsgrove	0.26	Discounted as the site is currently occupied and in use, it is not considered suitable for allocation.	N		Y
BDC065	The Avenue	Rubery	3.39	Discounted as the site is currently occupied and in use, it is not considered suitable for allocation.	N		N
BDC107	The Sawmill, Hartle Lane	Belbroughton	0.44	Could be considered for allocation	Y	8	Y
BDC163	Finstall Training Centre, Stoke Road	Bromsgrove	0.5	Planning permission granted	N	6	Y
BDC192	All Saints Vicarage, Burcot Lane	Bromsgrove	0.26	Could be considered for allocation. Would need to contact owner to establish whether site is still available	N	8	Y
DEVL02	Wythall Green Business Park	Wythall	1.77	Could be considered for continued employment allocation	N		N
DEVL04	Bromsgrove Technology Park	Bromsgrove	1.5	Could be considered for continued employment allocation	N		N
DEVL05	Bromsgrove Technology Park	Bromsgrove	1	Could be considered for continued employment allocation	N		N

InitialREF	Site Name	Nearest Settlement	Area (ha)	Assessment outcome	GB?	Yield	HSG?
DEVL06	Bromsgrove Technology Park	Bromsgrove	0.47	Could be considered for continued employment allocation	N		N
TC01	Historic Market site, St John Street	Bromsgrove	0.19	Planning permission granted for community and business use	N		N
TC05	School Drive	Bromsgrove	0.74	Could be considered for allocation (2040 Vision)	N	32	Y
TC06	Windsor Street	Bromsgrove	0.68	Could be considered for allocation (2040 Vision)	N	43	Y
TC08	Birmingham Road/ Stourbridge Road Junction	Bromsgrove	0.3	Could be considered for continued employment allocation	N		N
TC11	Churchfields Multi Storey Car Park	Bromsgrove	0.43	Could be considered for allocation (2040 Vision)	N	37	Y

## Appendix 2: Density analysis

Site	Area (ha)	Capacity	Density (dph)	Capacity +10%	Density (dph)	Capacity +15%	Density (dph)	Capacity +20%	Density (dph)	Capacity +25%	Density (dph)
Alvechurch, land adjoining Crown Meadow	0.6 x 85% = 0.51 nda	27	53	30	59	31	61	32	63	34	67
Alvechurch, Birmingham Road/ Rectory Lane	1.06 x 85% = 0.9 nda	25	28	28	31	29	32	30	33	31	34
Barnt Green	5 x 65% = 3.25 nda	88	27	97	30	101	31	106	33	110	34
Catshill	6.04 x 65% = 3.93 nda	80	20	88	22	92	23	96	24	100	25
Hagley	21.9 x 65% = 14.24 nda	283	20	311	22	325	23	340	24	354	25
Bromsgrove, Wagon Works/St Godwalds Road	7.8 x 65% = 5.1 nda	181	35	199	39	208	41	217	43	226	44
Wythall, Selsdon Close	3.1 x 65% = 2 nda	76	38	84	42	87	44	91	46	95	48
Wythall, Bleakhouse Farm	6.3 x 65% = 4.1 nda	178	43	196	48	205	50	214	52	223	54
BROM1 (Norton Farm)	17.73 x 65% = 11.5 nda	316	27	348	30	363	32	379	33	395	34
BROM2 (Perryfields)	67.75 x 65% = 44 nda	1300	30	1430	33	1495	34	1560	35	1625	37
BROM3 (Whitford Road)	17.5 x 65% = 11.4 nda	370	32	407	36	426	37	444	39	463	41
Totals:		2924		3218		3355		3509		3656	

# Appendix C: Duty to Co-operate letter



**Bromsgrove**  
District Council  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

Dear Colleagues,

27<sup>th</sup> June 2022

## **Bromsgrove District Plan Review – Duty to Cooperate (DTC)**

Bromsgrove District Council (BDC) is currently progressing the review of the Bromsgrove District Plan. In order to move towards a preferred option, we wish to obtain your views on a number of key considerations.

We have now published a Housing and Economic Development Needs Assessment (HEDNA) which recommends draft housing and employment requirements to be included in the plan for the period to 2040. In summary they are as follows:

### **HEDNA**

- A housing requirement of 383 dwellings per annum in line with the Government's local housing need standard methodology (N.B. this is a 2021 based figure, using 2020 affordability ratios)
- An industrial land requirement of between 21-28 hectares, with a current supply deficit of between 6-13 hectares
- An office space requirement of between 37,000-45,000sq m, with a current supply deficit of between 5,000-13,000 sq m.
- Possible inclusion of an industrial led employment park of approx. 25 hectares

The HEDNA can be viewed via our website at [www.bromsgrove.gov.uk/districtplan](http://www.bromsgrove.gov.uk/districtplan)

As a duty to cooperate partner it is important that we have your views on the questions posed below.

1. The above section outlines the likely housing, employment land and traveller pitch requirements the review of the Bromsgrove District Plan will contain. Please can you confirm whether you view these as acceptable requirements for inclusion in Bromsgrove's Plan. If you disagree, please explain why.

2. As you are aware, Bromsgrove is a Green Belt authority with 89% of the district designated as such, and with the remainder either already developed or allocated for development. BDC in its extant District Plan and early consultation on the Plan review, stated the need to review the Green Belt and release land to meet future development needs. Officers believe this still to be the case, although the Council needs to ensure that exceptional circumstances exist to release this land as per the NPPF. As a member of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and a DTC authority, we would ask if you could consider taking some of Bromsgrove's emerging growth requirements to minimise Green Belt release in the District. If you are able to accommodate some of BDC's development needs, please indicate the type and amount you are able

to accommodate. Likewise, if you are unable to accommodate some of our development needs, please can you provide sufficient justification to support your position.

3. Whilst Bromsgrove is predominantly a Green Belt authority, we are also equally aware of our obligations through the NPPF to assist with accommodating any unmet need from neighbouring authorities where it is practical to do so. It is our understanding that the housing shortfall that exists across the Greater Birmingham and Black Country Housing Market Area is being driven by a lack of supply in the Birmingham City and the Black Country Local Authority areas. That being the case, are there any other additional unmet housing needs originating from within your authority area that we need to consider?

4. Are there any other unmet development needs, such as for employment land that we should be considering?

5. Does your Council have any views on what, if any contribution, Bromsgrove should be making towards meeting the needs of the wider housing market area? Please provide the reasons for your views and evidence of the exceptional circumstances needed to justify releasing some of Bromsgrove's Green Belt to meet such needs.

6. Do you have any other shared strategic issues such as cross boundary infrastructure needs that you would like to raise at this stage?

Ultimately any agreement between our authorities will need to be reflected in a Statement of Common Ground, but in the shorter term a response setting out your authority's initial position on these matters would be greatly appreciated.

If you would like to meet with Council Officers to discuss any of your answers or the issues raised above in more detail, please contact me on [m.dunphy@bromsgroveandredditch.gov.uk](mailto:m.dunphy@bromsgroveandredditch.gov.uk).

We would request that all responses are sent to us by 31<sup>st</sup> July 2022.

Yours faithfully,

A black rectangular box redacting the signature of the Strategic Planning and Conservation Manager.

Strategic Planning and Conservation Manager  
Bromsgrove District Council