19th June

Bromsgrove District Local Plan Draft Development Strategy Consultation 2025

Relevant Portfolio Holder		Councillor Kit Taylor	
Portfolio Holder Consulted		Yes	
Relevant Assistant Director		Ruth Bamford	
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Wards Affected		All	
Ward Councillor(s) consulted		Yes via Strategic Planning Steering	
		Group	
Relevant Council Priority		Economic Development	
		Housing	
		Environment	
		Infrastructure	
Non-Key Decision			
If you have any questions about this report, please contact the report author in advance of the meeting.			

1. **RECOMMENDATIONS**

The Council is asked to RESOLVE that

1) Bromsgrove District Local Plan Draft Development Strategy Consultation be approved, for a period of public consultation between 30th June and 22nd September 2025 in order to enable these and other potential proposals to come forward and to continue to be appraised as part of the plan making process.

The Council is asked to RESOLVE to NOTE that

- 2) By endorsing the consultation members are not approving any one particular site for development at this stage and members are still entitled to form individual views on the merits of the possible sites identified for development.
- Delegated authority is given to the Assistant Director for Planning, Leisure and Culture Services following consultation with the Cabinet Member for Planning, Licensing and WRS to make any minor technical corrections and editorial changes deemed necessary to aid the understanding of the documentation prior to final publishing.

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2. BACKGROUND

- 2.1 The purpose of this report is to seek approval for a twelve-week District wide consultation on the Bromsgrove District Local Plan Draft Development Strategy (DDS) 2025.
- 2.2 In February 2025 the Council approved a new Local Development Scheme which identified that consultation on a draft Local Plan would begin in May or June 2025. If approved, the consultation on the DDS will mean the Council will have met its stated aim, and satisfy the Ministry of Housing, Communities and Local Government (MHCLG) that Bromsgrove District Council (BDC) is committed to plan-making and progressing a Local Plan in line with its published timetable. The Council could be at risk of Government intervention should a new local plan not progress according to the timetable.
- 2.3 The DDS builds on previous consultation carried out in 2018 and 2019 when the Council consulted on Issues and Options and Further Strategic Issues respectively. The 2019 consultation also included a Call for Sites exercise, which provided the Council with over 400 different sites to be assessed for inclusion in future versions of the Plan. These sites have now been assessed and the DDS includes an initial suite of possible sites for potential allocation to inform a future draft Local Plan.

3. **OPERATIONAL ISSUES**

Housing and Employment needs

3.1 The DDS has been developed over a number of years where the planmaking system has suffered from major uncertainties. These uncertainties have required the Council to react in different ways to the changing circumstances. Most notable in all the changes was the publication of a new Standard Method for assessing Local Housing Need (LHN) in December 2024. The new Standard Method for LHN was the newly elected Government's response to the housing crisis. The new LHN significantly increases the housing requirement for Bromsgrove district from an annual requirement of approximately 380 new dwellings per annum (DPA) to just over 700 DPA. The latest LHN figure (May 2025) is 715 DPA, which means the overall requirement for a plan which runs for 15 years post adoption stands at 12,155 (assuming the plan requirement number is fixed in late 2027). BDC has approximately 3,000 dwellings in supply which leaves a requirement to find land for circa 9,155 new dwellings, the DDS is the first attempt to do this. Please note, the LHN will more than likely change as new housing affordability

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information is published annually. As soon as changes are published officers will reflect these in any updated material.

3.2 The process for determining other development needs such as employment is not fixed and no set requirements are provided in the National Planning Policy Framework (NPPF) or the National Planning Practice Guidance (PPG). The DDS has responded to this by setting out a number of key questions, of which the answers will help to inform an update to the Housing and Economic Development Needs Assessment (HEDNA) which is required by the NPPF.

Development of the Strategy

- 3.3 The DDS has been produced with significant involvement from the elected members of Bromsgrove District throughout 2024 and 2025. The Strategic Planning Steering Group (SPSG) has been presented with a number of alternative options produced by both officers and members. What is clear from the discussions at the SPSG is that there are many different views on what and where the future development across Bromsgrove district should look like.
- 3.4 The options which were discussed at length consisted of:
 - A. Development at Bromsgrove settlements plus edge of West Midlands conurbation;
 - B. Development at Bromsgrove settlements only;
 - C. Development along rail corridors only:
 - D. Development at Bromsgrove settlements plus creation of, and improvements to, motorway junctions to the north and southwest of Bromsgrove town; and
 - E. Development along the edge of the West Midlands conurbation only.
- 3.5 The options A-E above share many similarities, and on balance it is felt at this stage considering the current evidence, that option A will provide the most sustainable development pattern for the District. Wide-ranging views have been expressed in relation to these options and there is no clear consensus from the elected members on what the detailed strategy should be at this stage. This highlights the need for consultation so the largest number of opinions as possible can be understood and tested. All these views will be considered and appraised and if they meet the criteria, be fed into following iterations of the Plan for further consultation at a later date.
- 3.6 Informing the development of the DDS and the discussions at the SPSG has been the emerging evidence base. The DDS and the choices made

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to this point have been informed by evidence such as Green Belt Assessment, Landscape and Visual Sensitivity Assessment, individual site assessments and many more elements which can be accessed on the evidence base page of the Council's website. All of this information also forms part of the consultation package and will be open for comment as part of the consultation.

- 3.7 At this stage it needs to be stated that the DDS is not a full draft local plan. There are many more elements which constitute a local plan which remain to be produced. One challenge which has always been present in plan-making is securing meaningful engagement with residents, stakeholders such as the NHS, the highways authorities, and the development industry. Typically, if an indication is given as to where growth may be happening, then people and organisations can engage and provide substantive responses. If no indication is given of where growth may be happening, then very often more generic non-specific responses are provided. At this stage in the process, we are now looking for substantive and specific responses to inform the next stage of planmaking.
- 3.8 The DDS is suggesting a suite of sites for potential future development. These sites have been selected using the site selection methodology. This methodology explains the criteria which have been used to assess the sites. The site selection methodology also has an addendum to it which explains the recent strategy development, and the need to relook at some elements such as green belt harm in order to meet the increased housing needs as referred to in para 3.1 above.
- 3.9 Also, as part of the consultation, the location of all the alternative sites submitted to the Council under the Call for Sites exercise will be open for consultation. If consultees have a preference for other sites to be included or simply wish to comment on the sites that haven't been chosen up to this point, then the ability to do that will be part of the consultation. It is clear when considering the site assessments carried out that many more sites have not been selected than those which have.

The Draft Development Strategy

3.10 The DDS is a draft, and the purpose of this consultation is to help provide the evidence by which to move on from a draft to a preferred option. There is no suggestion at this point that any of the sites included are fixed. Sites will be scrutinised again following the consultation. There is every possibility that the preferred option, once prepared, will not include exactly the same sites that have been selected up to this point. It is vitally important for residents and stakeholders in this process to make their views known to us to help inform those future decisions.

3.11 The DDS contains possible development sites across the district. The list of potential sites is below:

Potent	Potential housing sites to meet the Local Housing Need shortfall				
up to 2043					
Site		Indicative			
Ref.	Site Name	Capacity			
BROMSG	ROVE				
BRM01	Land at and adjacent Bromsgrove Golf Centre	1300			
BRM02	Land at Norton Farm	80			
BRM03	Land off St Godwald's Road	300			
BRM04	Bromsgrove Cricket, Hockey & Tennis Club	150			
BRM05	Land at Stoke Court Farm	190			
BRM06	Land north of Old Burcot Lane	550			
	SUB TOTAL	2570			
ALVECHU	IRCH				
ALV01	Land west of Redditch Road / south of Station Road	400			
ALV02	Land to east of Birmingham Road	100			
	SUB TOTAL	500			
BARNT G	REEN				
BAR01	Land between Twatling Road and Cherry Hill Road	140			
BAR02	Land north of Kendal End Road	50			
BAR03	Sandhills Farm	150			
	SUB TOTAL	. 340			
CATSHILL					
CA01	Land between Woodrow Lane and A38 Halesowen Road	165			
CA02	Land to rear of Four Oaks Drive	140			
CA03	Land west of Birmingham Road	300			
	SUB TOTAL	605			
HAGLEY					
HAG01	Land North of Western Road	180			
HAG02	Land south of Western Road	350			
	SUB TOTAL	. 530			
WYTHALL					
WY01	Land south of Houndsfield Lane	875			
WY02	Land east of Lea Green Lane	60			

Potential housing sites to meet the Local Housing Need shortfall				
up to 2043				
WY03	Land south of Station Road	300		
	SUB TOTAL	1235		
STOKE PI	STOKE PRIOR			
STP01	Land at Ryefields Farm	500		
	SUB TOTAL	500		
FRANKLEY				
FRA01	Land at Frankley	3000		
	SUB TOTAL			
	TOTAL	9280		

- 3.12 These sites are the outcome of the consideration of the evidence and discussions held over recent months. The principle of the strategy is to identify sites which are located in the most sustainable locations. That means locations where there is already existing physical and social infrastructure which can be enhanced to accommodate further growth. Locations which are close to existing transport corridors, ideally public transport corridors such as rail and bus routes. Locations which have town and local centres and ideally a wide range of jobs. The sites chosen have been based on a selection process which looks to find those sites which best meet the criteria above, but also which have the least amount of constraints from environmental designations, such as flooding, and noise pollution for example. The full Site Assessment and Site Selection methodology and Outcomes can be seen in the evidence base.
- 3.13 Also included in the consultation are a series of questions about the future employment land strategy the Plan could include. As stated above, the HEDNA needs to be updated and the information provided though this consultation will help to inform the nature of the updated evidence.
- 3.14 A further part of the DDS is a section outlining a possible longer-term approach to growth for Bromsgrove District. This option includes the potential for major new motorway or rail infrastructure to be provided. Through the consultation, we're keen to understand the challenges posed by this option. It may be that if they are seen favourably and considered to be deliverable within the Plan period, the DDS and the sites chosen may need to be reassessed to enable a different approach.
- 3.15 As stated above, the Development Strategy is a draft, and we're seeking important information from the consultation process. Most notably, we are seeking information on the current infrastructure challenges the

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District faces and the possible solutions to these challenges going forward. For each of the areas where growth is being suggested, information has been provided on the possible infrastructure required to support that development. The only way we can test if these assumptions are the correct way to progress, is to fully understand the current issues each areas faces and test whether the possible solutions will ensure that development does not impact adversely on these areas. This work cannot be done solely by officers or consultants. This work has to be informed by the views of the communities across Bromsgrove District that have key local knowledge of these places. This is the most significant element of this consultation.

The Consultation

- 3.16 The Consultation is scheduled to begin on the 30th June 2025 to avoid any crossover with the current consultation on Local Government Reform. The consultation period will run for 12 weeks until 22nd September, allowing for significant engagement over the summer period. Consultation methods will be designed to reach the broadest range of consultees as possible, with the integration of both digital and non-digital consultation methods to achieve this. Council Officers will be available at in-person events, so the public are able to speak with Officers directly. The schedule of these events will be finalised following the Council meeting if approval to consult is agreed. A drop-in session will be held in all locations where growth is being suggested.
- 3.17 For this consultation, an online consultation platform called 'Commonplace' will be used. This consultation platform should make it easier to engage with 'harder-to-reach' groups such as young people. Commonplace should also make the consultation process more engaging for consultees (through offering a range of options such as being able to look at interactive maps) and enables more detailed post-consultation analysis, by using data gained from the digital platform to identify demographic data about consultation respondents.
- 3.18 The text used in the DDS document (Appendix 1) will be consistent with the text used on Commonplace. The DDS document will be provided online in full and at events in hard copy. The current version suggests in red text the form of questioning which will be in place for the consultation. In most instances, each question will be followed by a free text field to allow people to express their thoughts in full, rather than be constrained by prechosen options. The links in the document will also be completed following the Council meeting and the completion of the website. The functionality of Commonplace will allow for different interaction with various elements of the consultation; for instance, being able to click on a map and submit comments rather than filling in forms. The consultation

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will be undertaken in compliance with General Data Protection Regulation (GDPR) rules on data and the relevant privacy notices will be displayed, so respondents are clear how the data they provide will be used.

- 3.19 The DDS Consultation document and all of the associated evidence base will be published on the Council's website, statutory consultees notified and paper copies of the document will be available in selected locations, which will be confirmed following the Council meeting.
- 3.20 Consultees will be encouraged to reply via Commonplace. However email and paper responses will also be accepted to make responding to the consultation as accessible as possible. A dedicated email address (bromsgroveplan@bromsgroveandredditch.gov.uk) will be available for consultee responses. All consultation documents will be made available on a dedicated Council webpage and Commonplace:

https://www.bromsgrove.gov.uk/council/policy/planning-policies-and-other-information/bromsgrove-district-plan-review/

https://www.bromsgroveplan.commonplace.is

Until the consultation is launched, the Commonplace website above will be showing a holding page where interested parties can sign up to be notified when the consultation goes live.

4. FINANCIAL IMPLICATIONS

4.1 A budget exists for the production of the Local Plan. This consultation is being funded from this budget.

5. LEGAL IMPLICATIONS

5.1 The consultation will be carried out in accordance with the Town and Country (Local Planning) (England) Regulations 2012 which outlines the statutory obligations for the consultation. The consultation will also meet the commitments set out in the Council's Statement of Community Involvement (SCI). The SCI includes an explanation of the plan-making process and identifies the consultation methods the Council will use during the consultation process.

6. OTHER - IMPLICATIONS

Local Government Reorganisation

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- 6.1 The latest National Planning Policy Framework (NPPF) and English Devolution Bill were published near simultaneously in December 2024. The Ministry of Housing, Communities and Local Government (MHCLG) have made it very clear that plan-making has to continue with all authorities being required to have a new plan timetable and subsequently a new plan in place as quickly as possible.
- 6.2 As recently as 3rd June, MHCLG wrote to Chief Executives of the Worcestershire Councils with an update on Local Government Reorganisation. Included within that letter is the following statement:

'The Government also recognises that developing proposals could distract councils from their essential day-to-day activities. However, residents and businesses depend on councils to deliver crucial services and to continue the efforts needed to establish successful new unitary councils. This is particularly important for advancing local plans to allocate land for new homes. As mentioned in the invitation letters, the Government expects local planning councils to work towards adopting an up-to-date local plan as soon as possible. Local Government Reorganisation should not hinder this vital work, nor should the introduction of the new legal framework for local plan-making later this year or our strategic planning reforms. Significant financial support has already been provided to eligible councils to aid in plan-making, and we encourage councils to utilise additional support available through the Local Government Association's Planning Advisory Service.'

Relevant Council Priorities

- 6.3 The Bromsgrove District Local Plan Draft Development Strategy Consultation 2025 is relevant to the following Council priorities:
 - 1. Economic Development
 - 2. Housing
 - 3. Environment
 - 4. Infrastructure

Climate Change Implications

6.4 The Local Plan will have significant implications for climate change, shaping the location and nature of new housing, employment, and infrastructure development. To ensure that climate resilience and sustainability are at the forefront of our plan-making, we need to adopt specific strategies such as promoting renewable energy sources,

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enhancing green infrastructure and improving energy efficiency to ensure only the most sustainable developments come forward. Additionally, prioritising sustainable transport options to reduce car dependency, implementing flood risk management strategies and ensuring Biodiversity Net Gain in all projects, will help Bromsgrove District achieve its commitment to Net Zero by 2050 and create a more sustainable and resilient community.

6.5 The specific policies to achieve the above will all be developed using the responses to this consultation and additional further evidence as required and will be contained in the next iteration of the Plan which is expected to be a full 'preferred option' style plan.

Equalities and Diversity Implications

6.6 This consultation will be open to all to comment in multiple ways, both online and in hard copy. Consultation events will also take place in a variety of locations and at different times of the day. Every effort will be made to ensure that we reach the widest amount of people and organisations as possible.

7. RISK MANAGEMENT

7.1 As stated above, the Government has stated that all Local Government Authorities must have an up-to-date Local Plan. The Council approved its Local Development Scheme in February 2025, which sets out the plan-making timetable in order to achieve an up-to-date local plan. This consultation is in-line with this timetable. The timetable agreed by members was that consultation would begin in May or June as confirmed by paragraph 2.7 of the report that accompanied the LDS.

'The significant element to note on the timetable is the publication of a draft plan for wide ranging public and stakeholder consultation in May or June this year. The details of the draft plan and also the approach to engagement and consultation will be covered in further reports in due course.'

7.2 The risk of not progressing to a new Local Plan is being managed by undertaking this consultation. Should the timetable not be kept to in the future, there is a risk of intervention by MHCLG, as outlined in the report accompanying the Local Development Scheme. The table below summarises the Local Development Scheme timetable:

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Year	Action
May-June 2025	Draft plan consultation begins (12 weeks)
October 2025	Notice of plan making under 30-month system
February 2026	Gateway 1 (Advisory)
June - July 2026	Public consultation (8 weeks)
December 2026	Gateway 2 (Advisory)
April - May 2027	Public consultation (6 weeks)
December 2027	Gateway 3 (Stop/Go)
January 2028	Examination
July 2028	Finalisation and Adoption

- 7.3 Not progressing a new plan or delaying the progression of the new plan, because of the uncertain future caused by Local Government Reorganisation, or dissatisfaction with the implications of wider Government policy, such as the increased housing need, could also leave the District at risk of Government intervention should a new local plan not progress according to the timetable.
- 7.4 In addition, due to the fact that the Council does not have a 5 year housing supply and also on the basis of the application of grey belt/green belt in the NPPF, this would lead Bromsgrove District Council open to the risk of sporadic forms of development from various applicants. The only way to guard against such sporadic development is by having an adopted local plan in place as this provides the necessary security.

8. <u>APPENDICES and BACKGROUND PAPERS</u>

Appendix A – Bromsgrove District Plan Draft Development Strategy 2025

Background Papers

The evidence which supports this consultation can be accessed on the following page of the Council's website:

Bromsgrove District Local Plan Evidence base

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https://www.bromsgrove.gov.uk/council/policy/planning-policies-and-other-information/bromsgrove-district-plan-review/evidence-base/

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Kit Taylor	9 th June 2025
Lead Director / Assistant Director	Ruth Bamford	9 th June 2025
Financial Services	Bob Watson	9 th June 2025
Legal Services	Claire Felton	9 th June 2025
Policy Team (if equalities implications apply)	Rebecca Green	9 th June 2025
Climate Change Climate Change Team (if climate change implications apply)	Matt Eccles	9 th June 2025