

Bilbrook Parish Council  
 Bilbrook Village Hall  
 Joeys Lane  
 Bilbrook  
 South Staffordshire  
 WV8 1JL  
 Tel: 01902 840007

Email: clerk@bilbrookparishcouncil.gov.uk  
 www.bilbrookparishcouncil.gov.uk  
 Office Opening hours: 10:00 am – 12:00 noon weekdays except Thursday



Strategic Planning Team  
 South Staffs Council Offices  
 Wolverhampton Road  
 Codsall  
 WV8 1PX.

10<sup>th</sup> December 2021

Dear Sir/Madam

Please find below the consultation response prepared by Bilbrook Parish Council and Bilbrook Neighbourhood Plan Steering Group as the Neighbourhood Planning Body (NPB) to respond to the proposed Local Plan preferred options, November 2021. This response primarily relates to proposed site allocation 519. (see Map below)



**Summary of key points.**

In general, the preferred options strategy is welcomed. It sets out a clear strategic framework for the entire district, however, there are concerns over the proposed details which show insufficient understanding of the issues in Bilbrook and as a result, the BNP objects to Site 519. It believes this is unsustainable growth on precious Green Belt and good quality agricultural land, the infrastructure does not support the growth and the growth is not in the best interests of Bilbrook residents and the natural environment. For this response, we have dealt with each relevant point in turn.

**The Strategic Growth Strategy** – The preferred options document states its vision is “South Staffordshire will strive to protect and enhance its distinctive rural character, communities and landscape..” Bilbrook currently has 2,200 households. The projected increase in growth to over 3,300 households. This is an increase of 50%. As such this level of growth would erode the rural character of the Village with in effect a significant urban extension, making Bilbrook unsustainable.

**Eroding the Green Belt** - The proposed site allocation 519 in effect is contrary to national planning policy in the fact that it erodes the Green Belt, defeating the purpose and includes development

proposals on 'best and most versatile agricultural land. There is a presumption in national policy against development in such locations unless very special circumstances allow.

One of the purposes of the Green Belt is to prevent neighbouring towns from merging into one another (NPPF Para 134). NPB wishes to protect the Green Belt, which provides vital environmental and recreational benefits, prevents urban sprawl, and encourages the use of brownfield sites. While it is not yet policy, Central Government says it does not want building on the Greenbelt. A Ministry of Housing, Communities and Local Government spokesperson has said: "Protecting the green belt is a priority and our national planning policy reinforces regenerating brownfield sites and prioritising urban areas."

South Staffordshire District is characterised by several villages of different sizes that are located in an arc around the West Midlands conurbation and in particular the metropolitan areas of Walsall, Wolverhampton and Dudley. The Green Gap between Bilbrook and Wolverhampton is currently one of the narrowest of these Gaps that are of strategic significance in separating the West Midlands conurbation from neighbouring settlements within South Staffordshire.

Green Belt loss should not be in strategic areas, especially where this significantly reduces the separation between urban areas and villages. The proposed release of site 519 will detrimentally erode the Green Belt between Billbrook and the adjacent urban conurbation of the West Midlands, defeating the purpose of the Green Belt.

This would be further exacerbated by the creation and subsequent expansion of the i54 business park close to residents. We assert that the Preferred Option Proposal to add a minimum of 848 dwellings to Bilbrook will threaten the separate identity and sense of place of Bilbrook that is separated from the City of Wolverhampton by a narrow and vulnerable Green Gap. It is felt a much stronger justification must be given as this is not demonstrated why this locality is required over others within the District.

The NPB understand the purpose of allocating Safeguarded Land. However great weight should be given to the wider implication of any further Green Belt release. Currently, the evidence base to support this growth strategy fails to demonstrate the wider transport and natural environment impacts.

### **Duty to Co-operate**

The decision to build 4,000 houses on behalf of The Black Country under the duty to co-operate:

- NPB believes (and this is backed up by a housing needs survey) that the existing safeguarded land and current site allocation 443 which would take around 425 houses would be more than sufficient for the needs of Bilbrook This means that 581 houses are being built on Bilbrook Green Belt for the needs of the West Midlands. NPB does not think it is right that the Green Belt of South Staffordshire should be sacrificed to save the Green Belt of the West Midlands.
- NPB does not think it is right that the Green Belt of South Staffordshire should be sacrificed to save the Greenbelt of the West Midlands.
- The Government is providing extra funding to the West Midlands to build on Brownfield site therefore NPB believed that building 4,000 extra homes for the Black Country should be met by developing brownfield land using the many sites across the West Midland and not Bilbrook Green Belt."
- There are some Brownfield sites in Bilbrook that should be investigated. For example the sites of the Grange Pub, Bilbrook House and numerous housing association sites.



*Bilbrook House*



*The Old Grange Pub*

- South Staffs Council has not considered that in August the West Midlands Combined Authority (WMCA) confirmed a multi-million-pound investment in Brownfield regeneration including a scheme in the centre of Wolverhampton to build 300 homes.
- Staffordshire and the Black County has more than 11,000 empty properties that should be filled before building new houses on the Green Belt

**Tier 1 Settlement** (Page 46 Local Plan preferred options)



The NPB does not agree with the classification of Bilbrook as a Tier 1 settlement.

- Bilbrook train station is different from Codsall or Penkridge or Great Wyrley.
- There is no opportunity to provide car parking.
- The proposed new development would not be within walking distance of the existing infrastructure, including Bilbrook Train Station.

**Loss of Best and Most Versatile Land** - The NPPF makes a presumption against the loss of the best and most versatile Land. Natural England classifies the land to be used for site 519 as grade 2 agricultural land which should not be built on



**Key**

-  Site 519
-  Grade 2 (very good) agricultural land

*Agricultural Land Classification*

**Highways infrastructure**

There is no data to indicate what the impact for highways would be with the potential allocation. The NPB is undertaking its own Road Impact Survey as part of the emerging Neighbourhood Plan as it believes the Highways infrastructure is already at capacity and numerous accidents show several junctions to be dangerous.



*Accidents at Dam Mill Junction*

## Flooding

Several roads around the proposed development are subject to regular flooding.



*Flooding at Barnhurst Lane*



*Flooding on Birches Road*



*Flooding on Lane Green Road*



*Flooding at Dam Mill*



*Flooding on the Woodman Junction*


## Inadequate infrastructure

The NPB believes the infrastructure cannot sustain the growth of the proposed site 519.

- **Severn Trent Sewage Works** – The Severn Trent Sewage system in Bilbrook is overloaded and there is an ongoing issue with frequent discharges into the watercourse downstream from the Severn Trent Sewage Works. Policy NB7 should take this into account.



*Sewage discharges from Bilbrook Severn Trent Works*



The Rivers Trust **Is my river fit to play in?** Map About Get Involved Data sources

This map shows where the sewerage network discharges treated effluent and overflows of untreated effluent and storm water into rivers in England & Wales. **Avoid entering the water immediately downstream of these discharges and avoid the overflows (brown circles), especially after it has been raining.** Use the search box or zoom on the map to find your location.

Shocked by this map and want to do something about it? Want to help us include data for Scotland and Ireland? Join us in our fight for healthy, clean rivers and support our campaigns **#TogetherForRivers & #EndSewagePollution.**

[Take Action Now](#)

Click the icons below to find out more about the different types of sewage discharges and the associated types of risks:

**SEVERN TRENT WATER**

**In 2020 this sewer storm overflow spilled 54 times for a total of 469 hours.**

Permit No: T/03/35861/R

*The Rivers Trust overflow spills.*

- **New First School** – From knowledge of the local schools, it is not believed there is a demand for additional primary provision. Future evidence gathering should investigate this more closely. The Head Teacher at Lane Green believes a new school is not needed as there is ample space for Lane Green First School to expand both outwards and upwards to cover the 267 dwellings on the Greenfield site.
- **New retail store** – It should also be noted that the local retailers are not thriving, and additional competition may be harmful to the survival of the village core in Bilbrook. New retail would also bring shoppers from Wolverhampton and only add to the traffic problems.

## Climate Change And Loss of the Natural Environment

NPB fully support the recognition of climate change being the most environmental challenge facing both the district and the world. It is understood that housing growth is a priority for the nation and that South Staffordshire must sustainably provide these.

It is noted that there has been no green infrastructure planning. The Staffordshire Climate Change and Adaptation and Mitigation Study is disappointing that it lacks mapping especially more firm identification of specific locations for efforts to feed into the design of site 519. It is also somewhat depressing to note that South Staffordshire seems to have the lowest percentage of semi-natural habitat by the proportion of any area within Staffordshire. It is hoped that the eventual plan will ensure that this is reversed.

The missing or broad-brush evidence is of significant concern given that environmental challenges are, stated as being central to the importance of this emerging plan.

It is noted that Site 519, the basis for Policy SA1 is identified within the South Staffordshire Nature Recovery Network Mapping as of Medium Distinctiveness and contains the following Habitat Connectivity Opportunity Areas: Woodland, Pasture, Arable, Grassland, Wetland

As part of the emerging Neighbourhood Plan, the NPB is commissioning Staffordshire Wildlife Trust to undertake Nature Recovery Network mapping for Bilbrook.

The Open Spaces Audit, concerning the proposed Site 519 Wolverhampton/Bilbrook extension is evidenced to show a lack of supply of Parks and Gardens, natural and semi-natural greenspace and amenity green space. The Shropshire Union Canal does provide a green corridor, however, the NPB believes this to be too narrow and should be extended to the East of Barnhurst Lane (Which is proposed for housing as site 519)



*The natural environment lost*

### **Strategic Objectives**

NPB support South Staffs Councils Strategic Objectives, however, it is hard to see how these will be achieved without significant strategic investment. They do not marry with the ambitions set within the Infrastructure Delivery Plan. Previous housing growth over the last 25 years in Bilbrook has not delivered sufficient compensating infrastructure. Therefore, there is little faith that there is robustness in delivery mechanisms to achieve the ambitions.

### **Housing Design**

The more specific policies including design, need more quantification and weight. It is noted that the poor design of the recent Bloor Housing off Pendeford Mill Lane should be avoided in future developments. These houses are expensive, cramped and not locally distinctive. The street scene is poor and not in keeping with the edge of the village setting. They also do not include Electric Vehicle charging points. Assurances that this will not be repeated are needed via a more robust and deliverable policy.

Bilbrook NLP strongly objects to 848 new homes on Site 519 and hopes that you will reconsider this proposal.

Yours faithfully,

Karen Daker  
Clerk to Bilbrook Parish Council.