**Wednesfield North Councillors Submission to SSDC Local Plan Consultation 2021.**

**The City Councillors of Wednesfield North Ward, in the City of Wolverhampton are Councillor Phil Bateman MBE and Councillor Mary Bateman, and Councillor Rita Potter. We are making this joint submission to South Staffordshire District Council with regards to the consultation taking place on the South Staffordshire District Council Local Plan. Which closes at 5.pm on the 13th December 2021.**

**Climate Change & The SSDC Local Plan.**

Whilst the Local Plan does not make too much about the current climate emergency the UK is battling. It is nevertheless a very important issue that will and should be factored into the planning decisions when making policy that can affect the development of settlements.

We believe that the Land North of Linthouse Lane marked as Option G, in the Local Plan should not form part of the Local Plan for development, as it stands right now. But it should be playing a major part in the local climate Change strategy of the conurbation and Staffordshire as a County

The land earmarked for housing, is currently arable land which is being farmed and it makes a valuable contribution to British food. It is farmed the year around and it has been producing food for the local processing industries for centuries. It is important to the Climate Change argument that it is retained as productive arable land. Much as it has been for farming over decades. Locally grown food is key to reducing the UK’s Carbon Footprint. The loss of this land with its hedges, ditches, trees and water courses to farming will have a knock-on effect in relation to the environment. Currently this land floods badly in stormy weather. 2,000 more roofs and hardstanding will only create quicker, faster, more voluminous run off, with disastrous consequences lower down and around river tributaries in the Severn water catchment areas. Including habitat and Biodiversity loss, watercourse pollution, soil erosion and depletion, greenhouse gas emissions, and waste disposal. We would urge the consultation to refuse to create a development that doesn’t create a better stronger more sustainable community. We look with horror on the water chaos caused in Essington because of poor water management by the Staffordshire Authority on its road network currently. This inability to reduce flooding on an historic road network around the Village, wouldn’t fill residents new or old. With confidence that this site is ideal for the number of properties that is being suggested for build

**Wildlife and Nature Conservation**

The Land North of Linthouse Lane is a very valuable ‘Green Lung’ for the local amenity in Essington and Wednesfield. It is the home and the feeding grounds for hundreds of different species of mammals, amphibians and Birds.

It has a rich bird life which changes with the advent of the seasons. It a valuable feeding grounds for the Peregrine Falcon, and Buzzard, and for other raptors and birds including migrant visitors. These include Lapwings, Woodcock, Swifts and Swallows, House Martins, Redwings and Fieldfares, and songbirds and finches of all kinds. In winter and during summer storms the land floods, and attracts other waders, geese and varieties of Ducks. It is home to Foxes and Badgers, and the increasingly rare Brown Hare and Rabbits. Bats of a number of different species.

Plus, it is also a site where Bull Rushes and amphibians can be found. It would be a huge loss to Local people who find walking and watching the birds and mammals, on this site. Also, the rich diversity of wild flowers and tree’ loss would be a bad move for residents in Wednesfield and their leisure and mental health. We strongly believe that SSDC must give equal weight to the importance of the Wildlife on this site as they do to the design and development of any new homes.

A full ecological and environmental impact study must be made before any decision are made to denude the wild life of all that they inhabit for all or part of the year.

We also feel that before these proposals are enacted that there must be a requirement that measures the benefit that this land has for the City and South Staffordshire as it stands, and not just as a site for maximising construction of homes and other economic development. We are aware that the site will generate Local Government tax for both South Staffordshire and Staffordshire with Essington Parish Council. None of those years of taxes will fall to the City of Wolverhampton. Yet the fact is that the development of this mini town on our doorsteps will bring nothing but increased climate change, more Greenhouse gas emissions, more sewerage issues and more flooding likely to our side of the boundary.

We urge the consultation team to consider these matter carefully and improve transport by providing integrated plans for public transport paid for by the developers that are fit for purpose and are environmentally acceptable.

**History and heritage, and Archaeology.**

Public walkways along the former Minerals Railway needs to be protected, as does the Public footpaths that travers across the site including the Monarchs Way. These are very valuable amenities and need to be protected. They are valuable in history terms and in the role and function they provided to the locality and neighbourhood. They are also valuable in linking places and currently they are used for leisure and mental health amenity. The Mineral Railway has a brilliant tree formed avenue that is again a natural habitat for bird and mammals. It is unusual in the way it looks, and is much loved by Wednesfield families, and it needs to be enhanced and protected. That way it protects the considerable industrial heritage, on this site. These fields also are likely to contain rich Archaeological sites. A full archaeological site examination should be carried out before any permissions are granted. The area has a rich history, of settlement from Anglo-Saxon times and artifacts and history should not be lost to the new development. Also the Land and fields were providing trips for local residents from airfields on the site in the 1920’s. This history should not be lost to the development of the site.

**Housing Targets**

We also believe that the current housing targets that are being offered by the Government as a reason for the requirements of the need for this Green Belt to meet housing demand here, and in The Black Country as being arbitrary. We believe it is important that both South Staffordshire and the City of Wolverhampton with the Black Country Boroughs need to develop their own Brown Fields Lands policy first, before taking the steps to eradicate the Green Belt where ever it may lie.

In the City of Wolverhampton’s case they are trying to achieve The Governments Housing targets, and there is scepticism in the way those targets have been calculated. The Metro Mayor is on record as stating that this Land North of Linthouse Lane **is not** required for the Black Country’s Housing need.

Already The City of Wolverhampton are having to rethink their plans for its City Centre because of the advent of Covid-19, and the impact that is making on transport provision and retail shopping going forward. There may be even more retail closures and the City centre may have to rezone for more leisure, and more dwellings and see conversions of retail buildings into apartments and flats. Which is highly likely.

We are keen that the plans now being considered also factors in the situation that relates already to a substantial number of homes that are already constructed but lie empty and unused in the private sector. In November of this year The City of Wolverhampton had a housing report that suggested that the Black Country and Staffordshire were stuffed full of empty property -The report stated that

* More than 11,000 properties are sitting empty across the Black Country and Staffordshire with some abandoned for more than two years, figures show.
* with at least 1,526 gathering dust for over 24 months – at the most recent count in October.
* in Wolverhampton, the sum was 2,495 with 1,327 of those gathering dust for six months or more, and at least 436 had been abandoned for more than two years.

So, it’s hard for us to read that the Green Belt will be eroded on Land North of Linthouse lane when these extra properties have come to light. I am hoping that SSDC will take account of these empty properties which I do not believe have been counted, when making the final decisions on the Green Belt and the required housing need supported options being made by the Councillors on the SSDC.

**Over Development of the site**

We believe that the 2,000 homes earmarked for this site option G, is an over development. It will create many more problems than it solves. It will be a minitown on the boundary with Wednesfield. Wednesfield is already very dense in terms of housing. With a shortage in the Neighbourhood of Green Belt already in its own City-wide green belt provision. We feel that our residents will suffer a decade of noise and nuisance created by this over development of this site.

The Wednesfield North urban scene is very much part of the city and the West Midlands conurbation. The proposal in Option G will also ‘blur’ the boundary between Wednesfield and Essington considerably. With little to demarcate the city from Essington. It will give impression that the conurbation had spread into Staffordshire. We believe the Option G as it stands should be refused.

**Education** Option G will also impact heavily on our Primary and Early Years Schools. Which are already struggling to provide enough places for the school projections within Wednesfield. If approval to continue to construct goes forward. The development must provide new schools on the site. Along with local shopping parades.

**Highways and Traffic Safety Concerns**

Our local distributor roads in Wednesfield are already full at peak times, giving rise to traffic jams, and making climate change for the worse not the better. Even more cars on Wednesfield’ streets will create more traffic Jams leading to an increase in greenhouse gas emissions. It will slow and delay local journeys and will impact badly on our Local Economy. We are concerned that the new development will want to use Kitchen Lane and Linthouse lane to provide traffic access and egress to the new development site. We do not want to see that happen. We believe that the access and egress should be via the traffic being accessed and egressed onto highways currently in and on the Staffordshire road network. Waste Disposal and Hazardous Waste needs to be thought through and a plan set out before approvals are granted for this site so that residents can see how long construction will take place. What road networks will be used to bring construction material on site, what networks will be used to take waste materials and other traffic off site. We feel that the highways in Wednesfield North should not be used for this type of traffic. We would like to see a refusal.

**NHS and Medical Provision**.

We also believe that this proposal should not go ahead with out the development of new NHS facilities in regards to GP doctors. Already GPs are overburdened in Wednesfield North and access to the local National Health Service hospitals Emergency & Accident units at New Cross are struggling to deliver the cover that is required now for residents. Dental services are already under pressure locally for access. As is GP Surgeries.

**Visual Amenity**

A prime reason our residents tell me why the SSDC Local Plan should reject this development is because. This is one of the only places where light pollution is at a minimum, where ‘Big Sky’s can be seen. Fantastic sunsets, and shooting stars! All of which is good for our resident’s mental health. All of which will likely be lost if this huge development is passed for construction. We would want to see any effects on listed buildings on or near the site protected from the site activity

**Police and the Fire Authority**

Crime and Fire protection will also have impact on this development. There needs to be a detailed plan of resources and implication of this site. Residents new to the minitown, if it is built will need to be sure that crime and its impact needs to be planned far in advance. People in Wednesfield and in Essington will want to feel safe in their neighbourhoods, confident of Police and Fire Authority support if called for. We call for a set of plans that set out how those issues and how the minitown will be policed and how the Staffordshire Force will deliver with West Midlands Police, and Fire force in a strategic way. We call this to be dealt with before the permissions are granted.

Best Regards

**This is a joint submission by Wednesfield North Ward Councillors**

**City of Wolverhampton**

**Councillor Phil Bateman MBE**

**Councillor Mary Bateman**

**Councillor Rita Potter**.

December 12th 2021