

## Bilbrook Neighbourhood Plan

### BB07 Local Green Space Policy – Informal Consultation Comments and Responses

The below table shows comments received by Bilbrook Parish Council during the period from 21<sup>st</sup> June 2023 to 13<sup>th</sup> July 2023, as a result of an informal consultation with property owners, residents, and other stakeholders on the sites listed in the Bilbrook Neighbourhood Plan BB07 Local Green Space Policy.

Site Number	Date of Consultation	Site Name	Comments Received	Comments from	Response from Bilbrook Parish Council
<b>BB01</b>	21/06/2023 to 13/07/2023	Jubilee Wood	All positive, definitely needs protecting.	Resident	Application for Local Green Space Designation to proceed.
<b>BB02</b>	21/06/2023 to 13/07/2023	The Oval* Field & Community Orchard	No feedback received	N/a	Application for Local Green Space Designation to proceed.
<b>BB03</b>	21/06/2023 to 13/07/2023	The Triangle*, adj to The Oval	Site is to the south of <redacted> land, however site not within <redacted> land. No objection.	Other stakeholder	Application for Local Green Space Designation to proceed.
<b>BB04</b>	21/06/2023 to 13/07/2023	Hubbard's Field*	Site BB04 is within <redacted> title. <Redacted> object to this inclusion due to	Landowner	Whilst Bilbrook Parish Council values the feedback provided, Bilbrook Parish Council is confident that the evidence supporting LGSD for this site is substantial and addresses the objection raised. Therefore, the application will proceed.

			land being within <redacted> (Joint) Title		
<b>BB05</b>	21/06/2023 to 13/07/2023	Lime Tree Road Green	Site not within <Redacted> title. No objection.	Other stakeholder	Application for Local Green Space to proceed.
<b>BB06</b>	21/06/2023 to 13/07/2023	Carter Avenue Green	<Redacted> title to the north of the site, however, site not within <redacted> title. No objection.	Other stakeholder	Application for Local Green Space to proceed.
<b>BB07</b>	21/06/2023 to 13/07/2023	Duck Lane Green	Site is within <redacted> title. <Redacted> object to this inclusion due to and being within <redacted> title.	Landowner	Whilst Bilbrook Parish Council values the feedback provided, Bilbrook Parish Council is confident that the evidence supporting LGSD for this site is substantial and addresses the objection raised. Therefore, the application will proceed.
<b>BB08</b>	21/06/2023 to 13/07/2023	Bilbrook Village Green	Site is to the south of <Redacted> Highway Land, however, site not within <redacted> title. No objection.	Other stakeholder	Application for Local Green Space to proceed.
<b>BB09</b>	21/06/2023 to 13/07/2023	Bilbrook Allotments	We approve the LGSD Application	Landowner	Application for Local Green Space to proceed.
<b>BB10</b>	21/06/2023 to 13/07/2023	The Old Village Green*	Site is adjacent to <redacted> Land, however, site not within <redacted> title. No objection.	Other stakeholder	Application for Local Green Space to proceed.
<b>BB11</b>	21/06/2023 to 13/07/2023	Dam Mill River Penk Meadow	Good afternoon, I represent <redacted> who are the legal owners of title	Agent on behalf of landowner	The representation made on behalf of the site's owners gives us the understanding that they would prefer the site to be designated as an additional area of housing growth. They made similar

		<p>number SF488607. Thank you for inviting comments in response to your letter dated 15th June 2023 regarding your Local Green Space Audit.</p> <p>I have some comments that I would be grateful for your consideration and response as we would disagree with the decision to designate the site as Local Green Space. I have gone into some detail as to why the site is suitable for future development and I would value your response.</p> <p>1. The site has been reviewed and considered in the</p>	<p>representations to South Staffordshire Council (SSC) for their considerations for allocations under the SHLAA and Local Plan review. SSC did not allocate this as a development site and instead chose to retain the Green Belt Designation.</p> <p>A nearby application for a single dwelling on Codsall Road (in Codsall Paris) was refused based in part on Green Belt considerations.**</p> <p>This site is a key area of greenspace which forms a small separation between Bilbrook and Codsall and the Black Country conurbation. It forms a liner open space of semi-natural vegetation with is part of the River Penk corridor. It was walked regularly by residents until access was blocked with barbed wire c, 15 years ago. In previous planning policy it was highlighted as an area for recreational provision.</p> <p>Therefore, the representation, although very much welcomed, does not change the opinion of Bilbrook Parish Council on the suitability of the Local Green Space designation. We conclude that it is open space very much in keeping with the semi-natural character of the riverside areas of the Parish.</p> <p>However, point 18 on the received consultation feedback is accepted. To that end, the application for BB11 Dam Mill River Penk Meadow will continue</p>
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		<p>latest SHLAA and was received positively. This was the only other positive SHLAA site within Bilbrook of a reasonable scale. Therefore, if there are any issues with deliverability on the East Bilbrook site, or when further sites require allocation in the future, Bilbrook will be required to find alternative sites on less suitable sites than Codsall Road. I note that the only policy constraints were Green Belt and Core Policy 1 (the same for all sites considered in Bilbrook).</p> <p>2. Bilbrook is a Tier 1 Settlement within the South Staffordshire</p>	<p>for the land south and west of the Railway Track only. Land to the north and east of the track, containing DEFRA priority habitats, will remain on the list of proposed designated sites, with site reference BB26.</p> <p>**This rejection was upheld under appeal in August 2023 by the Planning Inspectorate based on in being inappropriate in the Green Belt (Appeal Ref: APP/C3430/W/22/3312627 Brookside Farm, Codsall Road, Codsall, Staffordshire WV6 9QG)</p> <p>In conclusion, we acknowledge the landowners' agent's comments. However, due to the established importance of the site as a green gap at the edge of the Neighbourhood Plan area and the neighbouring Wolverhampton conurbation, and its strategic wildlife corridor value, we intend to continue with our proposal to designate the area as Local Green Space.</p>
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			<p>settlement hierarchy. Hence why 848 homes have been allocated at Bilbrook East. However, I would argue that this scale of development will cause some upset towards locals due to the scale and length of time this development will take to complete, which will significantly change the look and feel of Bilbrook as today and encourage further intrusion into the open countryside.</p> <p>3. As above, continued expansion of the 'East of Bilbrook' strategic allocation will result in capacity issues at both middle and high schools. Developers</p>		
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			<p>will begin to 'tie up' land around this area, knowing that it will continue to expand as Bilbrook is a Tier 1 Settlement which will require future growth capabilities. The purpose of the East Bilbrook site is to 'create a new arrival point into the existing settlement of Bilbrook, providing a distinctive and attractive gateway and sensitive edge to the countryside'. I would like to make the point that our site, off Codsall Road, is also a key entrance to Bilbrook from Wolverhampton, which currently is an overgrown and 'eyesore' site. The site</p>		
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		<p>would be developed by a reputable bespoke developer for a small-medium scale site which would have a grand entrance, and a large green buffer to the north (as demonstrated in appended pdf). It would have an 'above average' level of open space, at least a 10% biodiversity net gain improvement and play spaces.</p> <p>4. Leading on from the above point, the site at Codsall Road is currently not accessible by the general public. This is not a site with existing public footpaths nor one that is used by the</p>		
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		<p>public for dog walking etc. It fundamentally serves no real purpose to the public and is not maintained to a high level. The development of part of the site could result in an attractive and well-designed entrance into the Bilbrook Parish Boundary by continuing the level of high-quality development as on Codsall Road and Coniston Road.</p> <p>5. I would also like to make the point that the East Bilbrook site would be putting immense pressures on Lane Green Road, which is not wide enough for 800+ new vehicles to be passing</p>		
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			<p>daily. The road also narrows significantly when approaching the railway bridge, which would be the direction of traffic for the majority of vehicles, being the main route into Wolverhampton. We have obtained highways advice from a reputable Transport Consultant who has confirmed that Codsall Road is a much more sustainable road, that is already at the appropriate width for an increased traffic flow. Development at Codsall Road would also prevent unnecessary levels of traffic into Bilbrook and Codsall, and instead encourages a safe</p>		
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		<p>route directly into Wolverhampton. Codsall Road also has a number of existing bus stops. The road also has appropriate visibility with no sharp bends or narrow turns. The speed of the road is also currently maintained due to being the main entrance into Codsall and Bilbrook.</p> <p>6. Again, with the East Bilbrook site, I would assume this is going to put severe pressures on existing facilities, particularly the schools as I understand only a primary school is to be delivered. I would also like to discuss that the East Bilbrook site</p>	
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		<p>protrudes into the open countryside significantly and development of this scale encourages extreme growth of Bilbrook, which will ultimately result in a loss of its distinctive characteristics. This development will almost double Bilbrook in size and scale. Developers will also quickly 'tie up' neighbouring sites as it will encourage growth to the north of Pendeford Mill Lane. The boundary of Bilbrook Parish is built-up to the west and becomes more rural and open to the north east. I would suggest that development of the</p>		
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			<p>draft allocation site would encourage further development into the open countryside, which would soon 'merge' with Pendeford which is unfavourable.</p> <p>7. Another point that I think is relevant is deliverability. Bilbrook has allocated only one, very large site and although this will be phased, there will be difficulties associated with the site which may cause delays. If the developer does not deliver at the exact speed forecasted, Bilbrook will then be required to quickly 'fill the gaps' by allocating further sites. I would like</p>		
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		<p>to point out that this is a deliverable, available and highly sustainable site, with willing landowners and interested developers. The site is in a wholly logical and sustainable location and preventing any development here entirely through the local gap scheme would tarnish the possibilities of a high-quality scheme that can be delivered in a well-managed but speedily fashion. This would ultimately result in much less sustainable sites being allocated in the future.</p> <p>8. With regards to access, our site unusually already has</p>		
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			<p>3 points of access. One of which are existing agricultural accesses off Codsall Road. Another being off Coniston Road. You will see from google maps that the existing development at Coniston Road has a road that punches through into our site. The landowner also has another point of access between properties 54 and 52 Coniston Road. This access would be appropriate as an emergency access and a pedestrian link into the neighbourhood. This link, as well as the other access off Coniston Road is extremely valuable as it enables</p>		
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			<p>parents and school children to safely walk to Palmers Cross Primary School which is within a 2-minute walking distance.</p> <p>9. It is worth mentioning that although falling within Wolverhampton Council's boundary, the land directly adjacent is being promoted by a reputable land promoter for development, and so some development on the adjacent side of Codsall road would mirror this proposed development and again, create a logical entrance to Bilbrook.</p> <p>10. My next point comes down to South</p>		
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			<p>Staffordshire's requirement to provide unmet needs of the wider Greater Birmingham and Black Country. This site is idyllic for Bilbrook as it is essentially putting their numbers on the boundary of Wolverhampton i.e. the site is not directly impacting local residents of South Staffs and instead is providing the essential numbers for Wolverhampton, whilst also reducing the housing requirement from Bilbrook and Codsall (i.e. if the site at Codsall road were to deliver 100 units, this is a valuable number</p>		
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			<p>of homes that would not be required elsewhere in the settlement).</p> <p>11. Following from the above, it has been referenced that this site acts as a 'barrier' preventing South Staffordshire merging with Wolverhampton. I would like to point out that this has happened in the majority of neighbouring settlements, and although settlements have merged (such as Codsall and Bilbrook and Perton and Wightwick) they still retain strong separating identities. I have driven down Codsall Road many</p>		
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		<p>times and the site does not feel like an 'important gap' by any means and is quite an eyesore, particularly being the 'entrance' to South Staffordshire from Wolverhampton.</p> <p>12. The site is well contained and has strong defensible boundaries at every angle. To the north, the River Penk dissects the site and so provides a strong boundary. To the east, the railway line separates the site from Aldersley High School. There is existing residential development to the south, and the land to the west is being promoted by a</p>	
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			<p>land promoter and developer.</p> <p>The character of the site is therefore quite 'built-up', and the site does not have any purposes as open space to the public, being inaccessible.</p> <p>13. The size of development would trigger S106 contributions to the local facilities, and although the site is on the border of Wolverhampton, these contributions would benefit Bilbrook and Codsall as the site falls within South Staffordshire.</p> <p>Therefore, we can look to improve local facilities and enhance open spaces. The site</p>		
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		<p>would also provide the required percentage of affordable housing, as well as potentially some bungalows to appeal to the ageing population of Bilbrook.</p> <p>14. A scheme of this size and character would provide a grand entrance to Bilbrook and Codsall that is of a sustainable and rural nature. I would say that the Bilbrook East scheme cannot be 'sustainably led' as it is for 850 homes and so it will of course change the characteristics of the settlement considerably due to the scale of development. A site of circa 100 units can be</p>	
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			<p>designed in a bespoke way to ensure that the build character is 'legacy led'.</p> <p>15. My next point comes down to the purpose of the Local Green Space audit. The purpose is to protect areas of 'particular importance to local communities'. This site is not overlooked by any properties, due to the strong defensible boundaries of the site and residents of Coniston Road would have assumed future development would be taking place due to the 'road to nowhere' that protrudes into the site. The properties of</p>		
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		<p>Coniston Road also have their gardens facing the field. Development of this site could in fact enhance the £/sqft value of the area, by instructing a high-quality and reputable developer to design a well-thought out and 'green focused' scheme.</p> <p>16. There are many sites included within the audit which have significant public value such as nature walks, nature reserves, footpaths and woods. I would certainly agree that the river penk is to be safeguarded. However, I would like</p>		
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			<p>to draw attention to the very rough sketch I have appended to this document, which shows that there would be a green buffer covering almost half of the site, providing a buffer to the river and to the railway line. This enables the river to be protected, whilst actually opening the site up for public use by providing important BNG spaces for wildlife, children's play etc. Finally, the proposed design of the site would mean that the settlements do not 'merge' as this site would essentially be an extension to Coniston Road, with the northern portion of</p>		
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			<p>the site remaining open. The green wedge would therefore have a more prominent feel and would ultimately fulfil a purpose.</p> <p>17. As above, if the site is to be developed, a developer would instruct a management company to uphold and maintain the BNG spaces, open spaces, green spaces and childrens play area. This means that the development would continually be well-maintained to a high standard. The developer would fund all costs, and this would be at no cost to the authority, nor the landowner.</p>		
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			<p>18. With reference to the DEFRA Priority Habitats Inventory, as kindly provided on the map included within your letter, does not include this land. Therefore, this site would not contribute negatively to the natural habitat of wildlife and vegetation.</p> <p>19. I would like to confirm that this response also represents the neighbouring landowner who is in mutual agreement. I would like to confirm on the landowner's behalf that being locals of surrounding villages, legacy is of immense</p>		
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			<p>importance. The landowners are willing to work with Bilbrook to promote a site that is capable of providing and retaining a long-lasting legacy site which holds great importance as the entrance to Bilbrook. The landowner's willingness provides the site with short-term potential to meet unmet need from the Black Country and also takes significant pressures off large SUE allocations. It is also logical for Bilbrook to allocate sites on Wolverhampton's boundary with existing infrastructure in place.</p>		
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			<p>I would like to thank you for inviting comments and I would welcome the opportunity to discuss this further with you. We would be really grateful and encouraged to discuss the site with you at this early stage, to see how we could look to work together to provide a scheme that is genuinely characterful and inviting to the public, rather than in the current form. I would like to request that the designation is therefore 're-drawn' excluding the part of the site that is developable. I would like to strongly emphasise that development of this</p>		
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			site can positively encourage new habitats, by providing at least a 10% biodiversity net gain and opening the space up to the public positively.		
<b>BB12</b>	21/06/2023 to 13/07/2023	Clewley Coppice	Site BB12 is within <redacted title. <Redacted object to this inclusion due to land being within <redacted> (Join) Title	(Joint) Landowner	Initially this proposal included a larger area of the i54 development, incorporating all footpaths and further green areas. On 29/01/2024 The Bilbrook NP Steering Group took the decision to remove the i54 footpaths from this proposal; from that date the proposal is for Clewley Coppice only.  Whilst Bilbrook Parish Council values the feedback provided, Bilbrook Parish Council is confident that the evidence supporting LGSD for this site is substantial and addresses the objection raised. Therefore, the application will proceed.
<b>BB13</b>	21/06/2023 to 13/07/2023	Pendeford Mill Nature Reserve	No feedback received	N/a	Application for Local Green Space Designation to proceed.
<b>BB14</b>	21/06/2023 to 13/07/2023	Pendeford Nature Walk	No feedback received	N/a	Application for Local Green Space Designation to proceed.
<b>BB15</b>	21/06/2023 to 13/07/2023	Heath Grove East	Site is to the south of <redacted> Highway Land, however, site not within <redacted> title. No objection.	Other Stakeholder	Application for Local Green Space Designation to proceed.

<b>BB16</b>	21/06/2023 to 13/07/2023	Heath Grove West	Site is not within <Redacted> Land. No objection.	Other Stakeholder	Application for Local Green Space Designation to proceed.
<b>BB17</b>	21/06/2023 to 13/07/2023	Marshall Way Balancing Pond	No responses received	N/a	Application for Local Green Space Designation to proceed
<b>BB18</b>	21/06/2023 to 13/07/2023	Withers Road Corner	Site is not within <Redacted> Land. No objection.	Other Stakeholder	Application for Local Green Space Designation to proceed.
<b>BB19</b>	21/06/2023 to 13/07/2023	Green Oak Road Corner South East	Site is not within <Redacted> Land. No objection	Other Stakeholder	Application for Local Green Space Designation to proceed.
<b>BB20</b>	21/06/2023 to 13/07/2023	Lane Green Road Service Road	Site BB20 is within <Redacted> title. <Redacted> object to this inclusion due to land being within <Redacted> Title.	Landowner	Whilst Bilbrook Parish Council values the feedback provided, Bilbrook Parish Council is confident that the evidence supporting LGSD for this site is substantial and addresses the objection raised. Therefore, the application will proceed.
<b>BB21</b>	21/06/2023 to 13/07/2023	Land at the corner of Barnhurst Lane and The Droeway	The proposal to include the land in the next local plan under a Local Green Space Designation (LGSD) should fulfil five criteria areas in all or part. These are Beauty, Historic Significance, Recreational Value, Tranquility and Richness of Wildlife.	Landowner	We acknowledge the landowner's comments. However, due to the importance of the site as a green gap between the Neighbourhood Plan area and the neighbouring Wolverhampton conurbation, along with its high value as a node between two strategic wildlife corridors, we intend to continue with our proposal to designate the area as Local Green Space. Individual responses to the landowner's comments are:  Beauty: As the land isn't easily accessible, it is accepted that significant views from it are unlikely

			<p>We will visit each of these criteria areas and test their relevance to placing the land under a LGSD.</p> <p>Beauty: Whilst the land is not ugly, it is overgrown, marshy and for a great part not easily accessible. The views mentioned from the land may be available from &lt;REDACTED&gt;land but not from the land owned by &lt;REDACTED&gt;. The &lt;REDACTED&gt; land is below the level of the canal and road so offers no view from it apart from the surrounding hedges. It is private land not readily accessible by the public.</p>	<p>to be found. However, the land offers an oasis of green infrastructure that offers a pleasant view from Barnhurst Lane and The Droveaway. It also offers a view of nature from Pendeford Nature Walk, across the canal. Its vegetation is in keeping with other much-loved and used wildlife sites in the area.</p> <p>Historic Significance: Historically, the site was a filter bed (one of two) which was part of a larger site of sewage works that were along Barnhurst Lane.</p> <p>Recreational Value: We agree that there is little physical recreational use available to the community on this site currently. It does, however, have significant passive recreational value to walkers and cyclists using Barnhurst Lane, The Droveaway, canal and the Pendeford Nature Walk.</p> <p>Tranquility: The site itself offers a noise break and much needed visual buffer to both residents of The Droveaway and people enjoying the Canal or Pendeford Nature Walk.</p> <p>Richness of wildlife: The site is a mixture of grassland, scrub, and trees, and therefore offers a variety of valuable habitats for animals and insect life. As the site is also prone to flooding, it offers a partial wetland habitat. Part of the site is listed as DEFRA Priority Habitat Inventory and most of the</p>
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		<p><b>Historic Significance:</b> There are no heritage assets or locally valued landmarks on or near the land in question. Nothing can be seen on the land or from the land of local historic significance.</p> <p><b>Recreational Value:</b> It has no recreational use for the community and is unlikely to have any in the near to medium term. There are no public footpaths, viewpoints or desirable destinations in or through the highlighted land. During heavy downpours the land is prone to flooding.</p> <p><b>Tranquility:</b> The proximity of the</p>	<p>site is listed as Woodlands in Natural England's Green Infrastructure Framework. Being at a junction with two wetland strategic wildlife corridors (the River Penk and Shropshire Union Canal) it forms an essential node for wildlife to move between them to access the wider landscape.</p>
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			<p>Wobaston Road, Barnhurst Lane and Droeway to the land deny the land of a good degree of tranquility. The roads, especially Barnhurst Lane, are busy roads with often speeding, noisy vehicles causing worry, fear and consternation to pedestrians, other road users and residents.</p> <p>Richness of Wildlife: The plant life related to the Land is not especially notable being mostly scrub and self-set trees and bushes. The animal life does not constitute any species of special note.</p>		
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			Conclusion: As can be seen by the preceding notes, the designation of the land, especially that belonging to <REDACTED>, does not fulfil the criteria for seeking Local Green Space Designation and should be excluded from the proposal to apply for Green Space Designation.		
<b>BB22</b>	21/06/2023 to 13/07/2023	Land at the corner of Lane Green Road and Wesley Road	No responses received	N/a	Application for Local Green Space Designation to proceed
<b>BB23</b>	21/06/2023 to 13/07/2023	Orchard Lane Green, Northern Corner	No responses received	N/a	Application for Local Green Space Designation to proceed
<b>BB24</b>	21/06/2023 to 13/07/2023	Banks' Field*	We approve the LGSD Application	Landowner	Application for Local Green Space to proceed.
<b>BB25</b>	21/06/2023 to 13/07/2023 and 26/08/2023 to 14/09/2023	Twentymans Playing Fields	1. We approve the LGSD Application 2. I am confused why the Joey's Lane open	Landowner Resident	1. Application for Local Green Space to proceed.



		<p>managed for nature and not just cut 12 or more times a year. Where appropriate I'd also like to see more street trees planted on our green spaces.</p> <p>3) I love them all and wish we had more especially the ones managed for nature.</p> <p>4) I am confused why the Joey's Lane open space area is not included....part is playing field but there is also hedgerows, trees and scrub home to various plants and wildlife (see BB25). Also the canal towpath side is not referred to as far as I can see, yet it is a vital open space corridor for wildlife and humans. Some of the Road verges</p>	<p>Resident</p> <p>Resident</p>	<p>Bilbrook Parish Council values this feedback and will continue to act to protect our green spaces.</p> <p>Bilbrook Parish Council values this feedback and will continue to act to protect our green spaces. Please see site BB25 above regarding the (Joey's Lane) Twentyman's Playing Fields.</p> <p>The Canal towpath was considered, however does not meet the criteria in place for LGSD. Bilbrook Parish Council will be working with other stakeholders in respect of protection for this important green corridor and active travel route.</p> <p>Bilbrook Parish Council is not aware of any count of visitors to Jubilee Wood. A figure of 100s has not been quoted in the evidence we have collated.</p>
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			<p>suggested are not particularly what I would term open space - but I can see their wildlife value and value in terms of human well-being. Not sure that the hundreds of people using Jubilee Wood each day is accurate. It is well used but has anyone counted daily use as being in the hundreds?</p>		
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Note: Site names marked \* are locally given names.