

Bilbrook Neighbourhood Plan Consultation Statement

January 2026



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1. Introduction

This consultation statement accompanies the submission of the Bilbrook Neighbourhood Plan 2024 to 2038. It summarises the community engagement programme and the Regulation 14 consultation. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

2. Summary of Community Engagement

- 2.1. The Neighbourhood Plan is based on the analysis of data and evidence, and views of the community. Building upon community engagement, the themes for the Neighbourhood Plan provide insight into local issues of importance to the community. Further engagement included a Neighbourhood Plan Survey and focused consultation on mapping of Neighbourhood Centres, proposed sites for Heritage protection, and proposed Local Green Space. Throughout the engagement and preparation of the Plan, Bilbrook Parish Council and the Steering Group have kept people informed and engaged via social media, community newsletters, and the Bilbrook Parish Council website. Feedback has been sought by all these routes as well as the Neighbourhood Plan Survey sent to all Bilbrook Parish Residents in Spring 2022.
- 2.2. The initial engagement in 2022 consisted of the Neighbourhood Plan Residents' Survey. This survey was made available to complete online, and a paper copy was delivered to all Bilbrook households with an edition of the Council's newsletter, the Bilbrook Buzz. The survey ran from 28th March to 19th May 2022 (extended from 5th May 2022 to give more opportunity for response as the period was over school holidays). An explanation of the intention of the survey was given online and in the Bilbrook Buzz. All feedback was documented and has steered the intentions of the Plan.
- 2.3. Informal consultations were run on individual policies BB02 Neighbourhood Centres, BB04 Heritage, and BB07 Local Green Space. In each consultation, both online and paper documentation was made available to residents, including at drop-in sessions at public locations in the Parish. Feedback was documented on each consultation, considered by the Neighbourhood Plan Steering Committee and Parish Council, and policies were amended where appropriate.
- 2.4. Parties that were targeted for the survey and informal consultations were:
 - Local residents, either online through the Council website on social media, posters on local noticeboards, or leaflets/newsletters to every household.
 - Local companies by the same methods as above.
 - Statutory consultees



2.5. The initial Residents' Survey identified the following key topics:

- Maintaining the rural surroundings and protecting green belt
- Maintaining the separation between Bilbrook and the West Midlands conurbation
- Concerns about infrastructure, eg medical facilities, highways, public transport
- Vibrancy and diversity of the Neighbourhood Centre
- Housing options for local residents, eg first homes, downsizing options
- Traffic congestion and speeding in the village
- Flooding issues

Policies were drafted and updated to support and address the themes identified. The feedback that was received during all of the community engagement was discussed at Steering Group and full Parish Council meetings, and any amendments were agreed on by Parish Councillors.

3. Pre-submission Consultation (Regulation 14)

3.1. Regulation 14 was undertaken from 27th May 2025 until 12th August 2025 (extended by 3 weeks to enable all consultees to access evidence documentation).

3.2. Parties that were consulted at Regulation 14 status were:

- Local residents
- Local companies by the same methods as above
- Statutory consultees
- Neighbouring Parish Councils

3.3. Parties that were consulted at Regulation 14 status were:

- Electronically to Statutory Consultees and neighbouring Parish Councils, via email with a link to the documentation. Hard copies of the draft Plan were available on request.
- Via a link on social media to residents.
- Flyers were delivered to all households and businesses within the Parish, with an explanation of the Regulation 14 process, a link to documentation and instructions on how to obtain a hard copy if required.
- Hard copies of the Plan and a consultation form were available at the following locations: The Woodman Inn, Holy Cross Church, Bilbrook Village Hall, Codsall Library.



- Drop-in sessions were held at the Woodman Inn, Bilbrook Village Hall, and Holy Cross Church Hall.



Figure 1 Bilbrook Neighbourhood Plan Reg 14 Flyer



A Neighbourhood Plan for Bilbrook

Bilbrook Parish Council has produced this draft Neighbourhood Plan for the area to guide the planning and future development of Bilbrook up to 2038. The Neighbourhood Plan enables the local community to have more say in what kind of development is allowed, including protecting key assets and local green spaces. It is not intended or able to prevent development.

This is the Regulation 14 consultation on the proposed Neighbourhood Plan. The Plan seeks to support the local economy and housing needs, positively address climate change, promote active travel and protect our green spaces.

There are seven policies within the Neighbourhood Plan. These include:

BB01 Residential Development
To set out sustainable locations for growth and planning requirements for residential development.

BB02 Neighbourhood Centres
To support a thriving community, maintaining and enhancing the current Neighbourhood Centre(s) without loss of the village identity. To promote and maintain a varied and vibrant level of retail, entertainment, community, health, and other business services for residents, keeping the village economy healthy.



BB03 Green and Blue Infrastructure

To protect and enhance the green and blue environments of the parish, including the landscape settings, wildlife habitats and their connectivity, flora, fauna, and biodiversity, for the future.

BB04 Heritage

To identify, protect and enhance Bilbrook's heritage, while enabling appropriate and sensitive change.

BB05 Place and Design

To provide sound, well-built homes, and neighbourhoods which provide for local people's needs, and enable a good life, without harm to the local environment or to the needs of future generations.

BB06 Transport and Active Travel

To promote sustainable transport which meets the needs of local people and promote active travel including walking and cycling.

BB07 Local Green Space

To protect green spaces which are of particular importance to local people.

How to have your say

View the Neighbourhood Plan online at:

<https://tinyurl.com/BPNPReg14Draft>

Or scan the QR code on the front page of this document.

View a hard copy and obtain a feedback form for the draft Neighbourhood Plan at:

- Bilbrook Village Hall (call 01902 84007 to make an appointment)
- The Woodman Inn, 2 Duck Lane, Bilbrook
- Holy Cross Church, Bilbrook Road, Bilbrook
- Codsall Library, Council Offices, 107 Wolverhampton Road, Codsall WV8 1PX

Community drop-in Events:

- Sunday 8th June, 2 pm to 4 pm Bilbrook Village Hall, Joey's Lane, Bilbrook WV8 1HJ
- Thursday 19th June, 10 am to 11:30 am Coffee Pop-in, Holy Cross Church Hall, Bilbrook Road, Bilbrook WV8 1EU
- Monday 23rd June, 6 pm to 8 pm The Woodman Inn, 2 Duck Lane, Bilbrook WV8 1HZ

Regulation 14 consultation runs from 9 am on 27th May to 9 am on 8th July 2025.

Representations can be made via the following routes:

- Use our online response form at <https://tinyurl.com/BPNPReg14Consultation>
- Email: assistant@bilbrookparishcouncil.gov.uk
- Post to: The Assistant Clerk, Bilbrook Parish Council, Bilbrook Village Hall, Joey's Lane, Bilbrook WV8 1JL

Post or email responses should refer to each comment's page number and/or policy reference.

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4. Statutory Consultees

Details of the statutory consultees that were consulted as provided by South Staffordshire Council are listed in the following table:

Statutory Bodies c) - l)

Coal Authority	planningconsultation@coal.gov.uk
Homes England	Hannah.Wilson@homesengland.gov.uk
Natural England	Rebecca.Underdown@naturalengland.org.uk
Environment Agency	westmidsplanning@environment-agency.gov.uk
Historic England	Elizabeth.Boden@HistoricEngland.org.uk
Network Rail	townplanninglnw@networkrail.co.uk
National Highways	info@nationalhighways.co.uk
Staffordshire County Council Highways	david.pyner@nationalhighways.co.uk
Three	jane.evans@three.co.uk
Vodafone/O2	EMF.Enquiries@ctil.co.uk
British Telecom	gssb@bt.com
Electricity	nationalgrid.uk@avisonyoung.com
Gas	nationalgas.uk@avisonyoung.com
Water & Sewerage Bodies	jack.robinson@severntrent.co.uk stevecolella@south-staffs-water.co.uk



Integrated Care Board
NHS Property Services

ssotics.comms@staffsstoke.icb.nhs.uk
Hyacynth.Cabiles@property.nhs.uk

South Staffordshire District Council

Senior Conservation Officer
Senior Ecologist
Lead Planning Manager

localplans@sstaffs.gov.uk
e.higgins@sstaffs.gov.uk
m.wall@sstaffs.gov.uk
k.harris@sstaffs.gov.uk

South Staffordshire Councillors

Cllr A Adams	a.adams@sstaffs.gov.uk
Cllr H Adams	H.Adams@sstaffs.gov.uk
Cllr P Allen	p.allen@sstaffs.gov.uk
Cllr J Ashley	j.ashley@sstaffs.gov.uk
Cllr M Barrow	m.barrow@sstaffs.gov.uk
Cllr B Bond	b.bond@sstaffs.gov.uk
Cllr J Brindle	j.brindle@sstaffs.gov.uk
Cllr G Burnett	g.burnett@sstaffs.gov.uk
Cllr V Chapman	v.chapman@sstaffs.gov.uk
Cllr R Cope	r.cope@sstaffs.gov.uk
Cllr M Davies	m.davies@sstaffs.gov.uk
Cllr P Davis	p.davis@sstaffs.gov.uk
Cllr S Dufty	s.dufty@sstaffs.gov.uk
Cllr R Duncan	R.Duncan@sstaffs.gov.uk
Cllr S Duncan	S.Duncan@sstaffs.gov.uk
Cllr C Evans	c.evans@sstaffs.gov.uk
Cllr M Evans	m.evans@sstaffs.gov.uk
Cllr W Fisher	w.fisher@sstaffs.gov.uk
Cllr S Harper-Wallis	S.Harper-Wallis@sstaffs.gov.uk
Cllr P Harrison	p.harrison@sstaffs.gov.uk
Cllr R Heseltine	r.heseltine@sstaffs.gov.uk
Cllr D Holmes	D.Holmes@sstaffs.gov.uk
Cllr F Hopkins	F.Hopkins@sstaffs.gov.uk
Cllr M Jackson	m.jackson@sstaffs.gov.uk
Cllr V Kelly	v.kelly@sstaffs.gov.uk
Cllr D Kinsey	d.kinsey@sstaffs.gov.uk
Cllr R Lees	r.lees@sstaffs.gov.uk
Cllr V Merrick	v.merrick@sstaffs.gov.uk
Cllr J Michell	j.michell@sstaffs.gov.uk
Cllr R Nelson	r.nelson@sstaffs.gov.uk



Cllr K Perry	k.perry@sstaffs.gov.uk
Cllr M Perry	m.perry@sstaffs.gov.uk
Cllr R Perry	r.perry@sstaffs.gov.uk
Cllr R Reade	r.reade@sstaffs.gov.uk
Cllr G Spruce	g.spruce@sstaffs.gov.uk
Cllr C Steel	c.steel@sstaffs.gov.uk
Cllr W Sutton	w.sutton@sstaffs.gov.uk
Cllr S Szalapski	S.Szalapski@sstaffs.gov.uk
Cllr B Williams	b.williams@sstaffs.gov.uk
Cllr D Williams	d.williams@sstaffs.gov.uk
Cllr V Wilson	v.wilson2@sstaffs.gov.uk

County Councillors for South Staffordshire

Cllr T Baker	thomas.baker@staffordshire.gov.uk
Cllr V Chapman	val.chapman@staffordshire.gov.uk
Cllr J Hodges	james.hodges@staffordshire.gov.uk
Cllr C Humphreyson	craig.humphreyson@staffordshire.gov.uk
Cllr C Large	chris.large@staffordshire.gov.uk
Cllr M Shortland	marie.shortland@staffordshire.gov.uk
Cllr M Woods	
Cllr V Wilson	victoria.wilson@staffordshire.gov.uk

Staffordshire County Council

Staffordshire County Council Planning Policy	planning@staffordshire.gov.uk james.chadwick@staffordshire.gov.uk
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South Staffordshire Parish Councils

Acton Trussell, Bednall & Teddesley Hay	actontrussell.clerk@yahoo.co.uk
Bilbrook Parish Council	clerk@bilbrookparishcouncil.gov.uk
Blymhill and Weston under Lizard Parish Council	phil.delaloye@googlemail.com
Bobbington Parish Council	clerk@bobbington.staffslc.gov.uk
Brewood and Coven Parish Council	clerk@brewoodandcoven-pc.gov.uk
Cheslyn Hay Parish Council	cheslynhaypc@tiscali.co.uk
Codsall Parish Council	codsallparishcouncil@googlemail.com
Dunston with Coppenhall Parish Council	dunstonpcclerk@yahoo.co.uk
Enville Parish Council	clerk@enville-village.co.uk
Essington Parish Council	clerk@essingtonpc.org
Featherstone and Brinsford Parish Council	blueseas02@outlook.com
Great Wyrley Parish Council	admin@greatwyrleypc.com
Hatherton Parish Council	siancarpenter@outlook.com



Hilton Parish Council	hiltonpc10@outlook.com
Himley Parish Council	himleyparishcouncil@gmail.com
Huntington Parish Council	lynnmcclymont@ntlworld.com
Kinver Parish Council	clerk@kinver-pc.gov.uk
Lapley, Stretton and Wheaton Aston Parish Council	office@wheatonastonparishcouncil.gov.uk
Lower Penn Parish Council	clerk@lowerpenn-pc.gov.uk
Pattingham and Patshull Parish Council	pattinghamparishcouncil@gmail.com
Penkridge Parish Council	clerk@penkpc.co.uk
Perton Parish Council	council@pertonparishcouncil.gov.uk
Saredon Parish Council	saredonpc@gmail.com
Shareshill Parish Council	siancarpenter@outlook.com
Swindon Parish Council	swindonparishcouncil@btconnect.com
Trysull and Seisdon Parish Council	clerk@trysull-seisdon-pc.org.uk
Wombourne Parish Council	enquiries@wombourneparishcouncil.org.uk

MPs for South Staffordshire

Sir Gavin Williamson CBE MP	gavin.williamson.mp@parliament.uk
Mike Wood MP	mike@mikewood.mp

The following organisations and groups were also consulted:

Staffordshire Police
Police and Crime Commissioner Staffordshire
Canal and River Trust
CPRE Staffordshire
City of Wolverhampton Council
Sport England
West Midlands Housing Association Planning Consortium
Department for the Environment, Food and Rural Affairs (DEFRA)
Staffordshire Ecological Record
Staffordshire Fire And Rescue Service
Staffordshire Parish Council's Association
Staffordshire Wildlife Trust
Equality and Human Rights Commission
National Federation of Gypsy Liaison Groups
The Showman's Guild of Great Britain
National Farmers Union (West Midlands Region)
Ramblers Association



Staffordshire Playing Fields Association
Together Active
Ancient Monuments Society
Canal & River Trust
Council for British Archaeology
CPRE
Inland Waterways Association (IWA)
National Trust
Royal Society for the Protection of Birds (RSPB)
Staffordshire Badger Conservation Group
Staffordshire Gardens and Parks Trust
Staffordshire Waterways Group
Woodland Trust
British Geological Survey
Home Builders Federation
Homes England
Accord Housing Association
Bromford Housing Association
Heantun Housing Association
Housing Plus Group
Sanctuary Housing Association
Midland Heart
Wrekin Housing Trust
WHG
CAMRA
Bilbrook First School
Bilbrook Middle School
Bilbrook Medical Centre
Codsall High School
Friends of Bilbrook

5. Issues

The main issues and concerns raised by the persons consulted and how these issues and concerns have been considered, and where relevant, addressed in modifications to the proposed neighbourhood plan are set out in the next part of this statement.



6. Responses to representations

POLICY	COMMENTOR STATUS	COMMENTS	BILBROOK PARISH COUNCIL RESPONSE
<p>CHAPTER 4: RESIDENTIAL DEVELOPMENT Policy BB01: Residential Development</p>	<p>South Staffordshire District Council</p>	<p>Paragraph 4.b. of Policy BB01 indicates a 40:60 split between rented and affordable home ownership products on windfall sites. This would not be consistent with either Policy H2 of the existing Core Strategy (2012) or Policy HC3 of the emerging Local Plan. Local Plan policy requires a 50:50 split between social rent and affordable home ownership on all new development i.e. allocated and windfall sites. Clarity is sought on this issue given that the supporting text confirms that the neighbourhood plan policy ‘intends to augment Local Plan policies on housing mix and not to modify Local Plan proportions or thresholds.’ The district council also has concerns regarding viability, as it is not clear whether any revised affordable housing requirements in the neighbourhood plan (including a different tenure split to those specified in the Local Plan) have been viability tested, to ensure that Policy BB01 is deliverable.</p> <p>Paragraph 4.9 This paragraph refers to shared ownership being the preferred option for affordable housing. The district council would recommend this text is revisited as it appears to be inconsistent with specific tenure requirements of Policy BB01, as well as adopted and emerging Local Plan policies, which require a mix of tenures. If the intention is for shared ownership to be the preferred form of affordable home ownership, this paragraph should be amended as necessary. The preference for social rent over</p>	<p>Clause 4 deleted.</p> <p>Clause 3 amended to include reference to affordable housing requirement.</p> <p>Interpretation amended to make reference to the AECOM rental and ownership proportions.</p> <p>Reference to shared ownership in the interpretation deleted.</p> <p>The statement on affordable housing for social rent being preferred to affordable rent cannot be moved from the interpretation to the policy itself because it is a statement of preference, rather than a policy requirement.</p>

		affordable rent is welcomed and is consistent with the district council's affordable housing evidence. However, the district council recommends the requirement for social, rather than affordable rent, should be explicit in the policy rather than in the supporting text. This will hold more weight in planning considerations and ensure consistency with Local Plan policies.	
CHAPTER 6: GREEN AND BLUE INFRASTRUCTURE	South Staffordshire District Council	<p>Paragraph 6.1 It is suggested that the terms 'green and blue infrastructure' should be redefined as 'natural or semi-natural habitats and ecosystems and the ecological connectivity they provide to species'. It is considered that the current definition is too broad.</p> <p>Paragraph 6.9 The requirement for 20% BNG exceeds the statutory requirement for developments to provide a 10% BNG, it is not clear that this enhanced requirement has been evidenced, or the viability implications tested.</p>	<p>Purpose updated to change wording from 'green and blue infrastructure' as suggested to 'natural or semi-natural habitats and ecosystems and the ecological connectivity they provide to species'.</p> <p>Paragraph 6.9 is not the policy. Removed to avoid confusion.</p>
Policy BB03: Green & Blue Infrastructure	South Staffordshire District Council	<p>Paragraph 1. The district council is not opposed to the use of the 'Urban Greening Framework' it is considered however that the Urban Greening Factor (Urban Greening Factor Standard) provides a more objective, quantifiable metric with which applicants can more readily demonstrate compliance. Whilst supportive of tree canopy cover goals, we are concerned that such a requirement might unintentionally override the principle of 'right habitat in the right place', for example tree planting might not be appropriate where wetland or grassland creation is ecologically more</p>	<p>Clauses re-number to be consistent with the Plan style.</p> <p>'Urban Greening Framework' replaced with 'Urban Greening Factor Standard' as suggested.</p>

		<p>valuable. We would suggest the policy is modified as follows:</p> <p>'and Tree Cover appropriate to the site's Tree Equity Canopy Cover Goal, unless tree planting would conflict with the delivery of other habitat types identified as strategically significant in the Local Nature Recovery Strategy.'</p> <p>Paragraph 2 There are no issues of significance with this element of the policy however we would just highlight the concern that potential issues could arise where additional recreational pressures impact on habitat sites.</p> <p>Paragraph 3 The second sentence is not consistent with the mandatory BNG requirements set out in national legislation. The policy as drafted effectively obliges applicants to deliver all BNG either on-site or within the Plan area. This directly conflicts with the statutory BNG hierarchy established under the Environment Act 2021, which allows for a more flexible, sequential approach: firstly, on-site delivery; secondly, off-site delivery at any location (not limited by administrative boundaries); and finally, the purchase of statutory biodiversity credits as a last resort. By requiring all residual BNG to be delivered locally, the policy short-circuits this process. This is problematic for several reasons and may be grounds for the plan to be found not legally compliant. For one, there are currently no registered habitat banks within the Plan area. This would effectively force developers to secure land</p>	<p>The now clause 2a amended as suggested.</p> <p>Comments noted. Second part of the clause that relates to infrastructure improvements removed.</p> <p>Clause removed.</p>
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		<p>locally for offsetting, an unrealistic and potentially unviable requirement that could bring construction to a halt in the Plan area.</p> <p>Moreover, should a habitat bank come forward locally, this policy could unintentionally create a monopoly scenario, whereby that single provider controls the ability of development to proceed in the area. Even with multiple providers, the artificially constrained market created by the policy could lead to inflated prices for biodiversity units, potentially undermining viability. The district council is aware that the parish council is developing a potential BNG site at Banks' Field, but we are not aware that this site is at a stage where legal agreements can be secured or units formally registered. Until that happens, this site cannot be relied upon to deliver offsetting, and it would be premature to shape policy around its availability. Even if it does come forward, there would still be significant concerns about the potential monopoly situation and the inconsistency with national guidance and legislation. In relation to the 20% BNG requirement, the need should be evidenced and the viability impacts assessed.</p>	
<p>CHAPTER 7: HERITAGE Policy BB04: Heritage</p>	<p>South Staffordshire District Council</p>	<p>Paragraph 1 The inclusion of items on the 'local list' of non-designated items is the responsibility of the local planning authority and is undertaken following an assessment of potential sites to identify which structures should qualify for inclusion on the list. The district council welcomes the identification by the parish council of non-designated assets; it is suggested that these should be referred in the policy as local list candidate sites. The sites themselves should then</p>	<p>This is incorrect. Planning Practice Guidance states "<i>There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes ...</i>" No change.</p>



		<p>be included in the supporting text rather than the policy. It is suggested that the wording of the policy be amended to include the following wording:</p> <p>‘The effect of proposals which are likely to impact on a heritage asset identified as a potential candidate for local listing should be taken into account in determining the application.’</p> <p>The conservation officer at the district council is available to discuss further how such an approach to the local listing of non-designated heritage assets may be undertaken.</p>	
<p>CHAPTER 8: PLACE AND DESIGN Policy BB05: Place and Design</p>	<p>South Staffordshire District Council</p>	<p>The district council would welcome clarification on how this policy is to be applied, will it apply to all developments or is it applicable to schemes of a certain scale.</p>	<p>Clause 1 deleted and replaced with an explanatory note in the interpretation.</p>
<p>CHAPTER 9: TRANSPORT AND ACTIVE TRAVEL Policy BB06: Transport and Active Travel</p>	<p>South Staffordshire District Council</p>	<p>Paragraph 1 The district council would welcome clarification on how this policy is to be applied, will it apply to all developments or is it applicable to schemes of a certain scale.</p>	<p>The policy already states ‘proportionate to the scale and nature of the scheme’ no change.</p> <p>Interpretation amended to provide further clarification on how the policy applies.</p>
<p>CHAPTER 10: LOCAL GREEN SPACE Policy BB07: Local Green Space</p>	<p>South Staffordshire District Council</p>	<p>General Comment: The total of twenty-six proposed spaces for designation is an extensive list. NPPF 107b) does require that designation should be demonstrably special to the local community and hold particular local significance. This is an issue which may be tested at examination. Sites situated within the village development boundary: This comment applies sites BB01, BB02, BB03, BB05, BB06, BB07,</p>	<p>Comments noted the Local Green Space Assessment report provides the analysis and justification of each space against the NPPF criteria.</p> <p>Although some of the spaces are adjacent to each other, they individually justify designation as LGS. We disagree that these spaces form an extensive tract of land.</p>



	<p>BB08, BB10, BB15, BB16, BB17, BB18, BB19, BB20, BB22, BB23.</p> <p>A number of these proposed sites are owned by South Staffordshire Council and the Property Services team are supportive of the proposed designation. Subject therefore to the general comment made above, we would have no further comments to make in respect to these proposals.</p> <p>Sites situated outside the village development boundary: This comment applies to sites BB04, BB09, BB11, BB13, BB14, BB21, BB24, BB25, BB26.</p> <p>Whilst these sites are submitted as discreet parcels of land, they are adjacent/adjoining each other. Therefore, when viewed collectively they constitute an extensive belt of land effectively encircling the area to the east of the village. The district council consider that this approach does not satisfy criteria (c) of NPPF107 that Local Green Space designation should be 'local in character and is not an extensive tract of land'. This approach would potentially conflict with the neighbourhood plan basic conditions.</p> <p>Sites situated away from the village development boundary: This comment applies to sites BB12, BB27.</p> <p>These sites are situated at a distance from the village development boundary, and it is considered that they fail to satisfy criteria (a) of NPPF107 of being in 'reasonably close proximity to the community it serves'.</p>	
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<p>General</p>	<p>Canal and River Trust</p>	<p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.</p> <p>Our waterways should be acknowledged within the policy document, as significant blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management.</p> <p>Based on the Bilbrook Neighbourhood Plan 2024 to 2038 Draft Version (V1.9), January 2025, ('the plan') the Trust</p>	<p>Comments noted.</p> <p>Rationale to heritage policy and blue and green infrastructure updated.</p>
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	<p>assist in identifying the canal corridor as part of that infrastructure.</p> <p>We also note that there is an aspiration to deliver more than the mandatory 10% Biodiversity Net Gain. National Planning Practice Guidance (NPPG)1 clarifies that: “Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.”</p> <p>As drafted, the supporting text the plan related to BNG (paras 6.6-6.9) does not clarify the evidence provided to justify the higher percentage. However, we do note that paras 6.10-6.15, relating to “A Green Infrastructure Strategy for Bilbrook”, does mention that some evidence related to green infrastructure generally can be found in that strategy.</p> <p>In any case, a copy of that strategy is not available on the plan documents webpage. Therefore, if BNG greater than the mandatory 10%, is proposed:</p> <ul style="list-style-type: none"> • the draft plan text should clearly refer to where evidence justifying this can be found; 	<p>Clause removed.</p> <p>The strategy was added to the website and everyone who made representations was informed and consultation was extended.</p>
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		<ul style="list-style-type: none"> • such evidence should address all the requirements outlined in the NPPG; and • links to, or copies of, the evidence should be provided on the plan webpages 	
<p>Chapter 7. Heritage & Policy BB04</p>	<p>Canal and River Trust</p>	<p>As outlined in our response on the Bilbrook Neighbourhood Plan Informal Consultation on Local Heritage, we welcome the identification of the site known as "Shropshire Union Canal Wharf, north of Bridge 4, Wobaston Road WV9 5BD", as a Non-designated Heritage Asset. We also note the reference in the policy to developments affecting the canal that "should take opportunities to enhance and not cause significant harm to the character or appearance."</p> <p>However, although the plan text identifies Listed Buildings, as well as non-designated Heritage Assets, it does not refer to the canal conservation area, a designated heritage asset. For consistency the plan text should be amended to also identify the Shropshire Union Canal Conservation Area in Chapter 7 text.</p>	<p>Comments noted.</p> <p>Paragraph added into the rationale stating that the full length of the canal is a designated conservation area, including the stretch in the Neighbourhood Area.</p> <p>Policy amended to make reference to the Conservation Area.</p>



<p>Chapter 9. Transport and Active Travel and Policy BB06</p>	<p>Canal and River Trust</p>	<p>We welcome the identification of the canal towpath as part of a wider active travel network. Most of the towpath in the plan area forms part of Sustran’s National Cycle Network route 81. The Trust is working closely with Sustrans on a project to improve the towpath along that route.</p> <p>The towpath network to the north of the plan area is also in public use. Figure 13 should be amended to show that section of towpath as a footpath (non-designated) to reflect this and better show available connections in the area to other routes as part of the wider paths network. Please do not hesitate to contact me with any queries you may have.</p>	<p>Comments noted.</p> <p>This is outside of the Neighbourhood Area. No change.</p>
<p>General</p>	<p>The Coal Authority</p>	<p>Thank you for your notification of the 22nd May 2025 seeking the views of the Coal Authority on the above.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records do not indicate the presence of any coal mining features at surface or shallow depth, which may pose a risk to surface stability and public safety, within the Neighbourhood Plan area indicated. On this basis the Planning team at the Coal Authority have no specific comments to make on the draft Neighbourhood Plan.</p>	<p>Comment Noted.</p>



<p>General</p>	<p>The Environment Agency</p>	<p>Thank you for your email of 22 May 2025, consulting us on the Regulation 14: consultation for the Bilbrook Neighbourhood Plan 2024 to 2038.</p> <p>In the absence of the allocation of specific sites for development within your plan area, we have no comment to make.</p> <p>We do not offer bespoke advice on policy.</p> <p>We advise you to ensure conformity with the Local Plan and refer you to guidance within our local Neighbourhood Plan proforma (attached) which should assist you moving forward with your plan. Matters relating to surface water (pluvial) flooding should be directed to Staffordshire County Council as the Lead Local Flood Authority (LLFA).</p>	<p>Comments noted.</p>
<p>General</p>	<p>National Highways</p>	<p>National Highways welcomes the opportunity to comment on the Bilbrook Neighbourhood Plan. National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on</p>	<p>Comments noted.</p>



		<p>the SRN of a planning application accordingly.</p> <p>Having reviewed the content of the Neighbourhood Plan, we can confirm that it does not propose any development or policy interventions that would directly affect the SRN. The Plan focuses on local-scale growth within the existing settlement boundary, improvements to green infrastructure, and enhancements to walking and cycling routes. While the i54 Technology Business Park, located at the eastern edge of the parish, lies near M54 Junction 2, the Plan does not include proposals or policies relating to the M54 or the SRN more broadly.</p> <p>Therefore, the proposals set out within the document are unlikely to have a significant impact on the operation of the SRN, and as such, National Highways offers No Comment.</p>	
General	Natural England	<p>Thank you for your consultation on the above dated 27 May 2025.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when</p>	Comments and Guidance Noted.



		<p>preparing a Neighbourhood Plan and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make.</p> <p>If an Strategic Environmental Assessment is required, Natural</p>	
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		England must be consulted at the scoping and environmental report stages.	
General	Network Rail	<p>Network Rail response on Neighbourhood Plans.</p> <p>Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).</p> <p>Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.</p> <p>Network Rail – railway specific advice notice to LPAs/Developers</p> <p>Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that</p>	Comments and guidance noted.

		<p>are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.</p> <p>Asset Protection Comments: Developments in the policy area should be notified to Network Rail to ensure that:</p> <p>(a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area.</p> <p>(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.</p> <ul style="list-style-type: none"> • Drainage works / water features 	
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		<ul style="list-style-type: none"> • Encroachment of land or air-space • Excavation works • Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues • Lighting impacting upon train drivers' ability to perceive signals • Landscaping that could impact upon overhead lines or Network Rail boundary treatments • Any piling works • Any scaffolding works • Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949) • Any use of crane or plant • Any fencing works • Any demolition works • Any hard standing areas <p>For any proposal adjacent to the railway, Network Rail would request that a developer constructs (at their own expense) a suitable steel palisade trespass proof fence of at least 1.8m in height.</p> <p>All initial proposals and plans should be flagged up to the Network Rail Town Planning at the following address: Email: TownPlanningNWC@networkrail.co.uk Railway Station</p> <p>Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development / employment areas within the neighbourhood area.</p> <p>Location of the proposal, accessibility and density of the development, trip generation data</p>	
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		<p>should be considered in relation to the station. Where proposals are likely to increase footfall and the need for carparking, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.</p> <p>Level Crossings Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon any level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail.</p> <p>Contributions will be sought where proposals impact on level crossings to mitigate the impacts of those developments. Where level crossing closure is the only option, the applicant is advised that closure would be via s257 of the T&CPA, and that closure would be required before the occupation of any dwellings.</p> <p>Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker</p>	
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		<p>land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.</p>	
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Received after consultation closed

Ecology Section 6. Green and Blue Infrastructure	Staffordshire County Council	<p>Purpose is welcomed.</p> <p>Biodiversity- Net Gain The intention to have 20% net gain on each development is welcomed; Bilbrook has only one designated site (Barnhurst Lane (land off)) which is of local importance only - a Biodiversity Alert Site. Habitat provision is generally poor in the area, but there are good</p>	<p>Comments noted.</p> <p>This has been removed in response to Local Authority and other comments.</p>
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		opportunities to expand and connect habitats, notably along watercourses (River Penk, Moat Brook and Shropshire Union Canal) and woodland areas. Green Infrastructure Strateg.Y- - the aims of this section are also welcomed.	
Archaeology/ Historic Environment	Staffordshire County Council	<p>The positive approach outlined with regards to preserving and enhancing Bilbrook's heritage/historic environment is welcomed. However, we are concerned about how robust and comprehensive the historic environment evidence base used in the production of the Draft Neighbourhood Plan has been. For example, the Staffordshire Historic Environment Record (SHER) does not appear to have been consulted. As the key database for archaeological sites and monuments, historic buildings, and historic landscapes across the county, a SHER search should have been commissioned as part of the production of the Neighbourhood Plan. Such a search would have ensured that a number of gaps/errors in the identification of heritage assets (designated or nondesignated) would not have occurred.</p> <p>For example, the Neighbourhood Plan fails to identify that the course of the Shropshire Union Canal running through the parish is a Conservation Area (a designated heritage asset), it also fails to identify that the canal aqueduct is not just locally listed, but that it is also a Grade II listed structure.</p> <p>Furthermore, it does not consider the inclusion of archaeological heritage assets in the list of non-designated heritage assets, or in the associated policy. For example, there are a number</p>	<p>Planning rational to Heritage amended to include reference to the Staffordshire Historic Environment Record (SHER).</p> <p>Reference to the Conservation Area added to Heritage rationale. Wording of policy BB04 also amended.</p> <p>The adopted Local Plan deals with archeology so there is no need for the Neighbourhood Plan to duplicate this.</p>



		<p>of archaeological sites in the parish identified on the SHER, including the course of the Greensforge to Pennocrucium Roman Road, Pendeford Deserted Medieval Settlement, and the site of Pendeford Hall.</p> <p>The SHER also identifies a number of historic farmsteads (lost or extant), which were recorded as part of the Staffordshire Historic Farmsteads Assessment, which provide a tangible reminder of Bilbrook's origins as a farming village. With this in mind, redevelopment, alteration or extension of historic farmsteads and agricultural buildings within the Parish should be sensitive to their distinctive character, materials and form. Due reference and consideration should be made to the Staffordshire Farmstead Assessment Framework.</p> <p>With regards to the list of non-designated heritage assets included in the Neighbourhood Plan, it is unclear what criteria or methodology was used to select these as the accompanying document identified in the text has not been provided.</p> <p>Another item of note is that the Heritage Policy (i.e. BBO4) only refers to non-designated heritage assets, however the accompanying interpretation provided in Section 7.9 notes that the policy applies to designated and non-designated heritage assets. The Policy and Interpretation should also take into account the below ground archaeology, and the</p>	<p>Pendeford Mill already mentioned in the policy.</p> <p>Interpretation to policy amended to include reference to the Staffordshire Farmstead Assessment Framework.</p> <p>The supporting evidence report was added to the website and everyone who made representations was informed and consultation was extended.</p> <p>The policy applies to both. Clauses 4 and 5 include designated heritage assets.</p>
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		<p>presence of known and potential archaeology should be considered in the proposals for new development in the parish. SCC's Historic Environment Team would be more than happy to discuss our comments further with the Parish Council. As outlined above would suggest commissioning a HER search in the first instance to ensure that the historic environment evidence base underpinning the Neighbourhood Plan is robust, up-to-date and comprehensive'.</p>	
Flood Risk	Staffordshire County Council	<p>6.17 - Policy BB03: Green and Blue Infrastructure generally concurs with standards and policies endorsed by the sec Flood Team - Lead Local Flood Authority (LLFA).</p> <p>Through the innovative delivery of multi-benefit Green/Blue SuDs (features such as open basins, swale, tree-pits, raingardens and other 'daylighted' systems) the holistic advantages of the 'Four Pillars of SuDs' can be delivered. Water Quality, Water Quantity, Amenity and Biodiversity can all be delivered and the wider cross-over benefits from the SuDS realised. These must be considered at the early stages of any site design and evidence included in any application for planning permission.</p> <p>The LLFA must be consulted (in their role as Statutory Consultee), on all applications for Major Development. Applications must comply with the Drainage Hierarchy- where all surface water discharge is dealt with in the following preference/order:</p> <ol style="list-style-type: none"> 1. Re-use / harvesting 2. Infiltration 	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p>



		<p>3. Discharge to watercourse/waterbody 4. Discharge to surface water sewer 5. Other.</p> <p>Finally, all Major development must comply with the Non-Statutory Technical Standards for SuDs, and the policies and standards contained within the sec SuDs Handbook.</p>	<p>Reference to the SuDs Handbook added to policy interpretation.</p>
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Other Representations

POLICY	COMMENTOR STATUS	COMMENTS	BILBROOK PARISH COUNCIL RESPONSE
General	Evolve Planning	<p>This representation, submitted on behalf of Bloor Homes Ltd, responds to the 'Bilbrook Neighbourhood Plan' pre-submission (Regulation 14) consultation being undertaken by Bilbrook Parish Council. The response is to the draft Neighbourhood Plan document having regard to the national and local planning policy context. It relates specifically to Land at East of Bilbrook where Bloor Homes has secured land interests and submitted an outline planning application which is currently awaiting determination (Reference: 24/00793/OUTM). A Location Plan is attached at Appendix 1.</p> <p>1.2 The site which is the subject of Bloor Homes outline planning application contains two areas of Safeguarded Land (references 209 and 443) which were identified through Policy SAD3 (Safeguarded Land for Longer Term Development Needs) in the adopted Site Allocations Document (SAD) to be safeguarded for the longer term development needs of the district beyond 2028.</p>	<p>Planning and site history noted.</p>



		<p>Should the emerging Local Plan be found sound and progress to adoption prior to the neighborhood plan being ‘made’ (or adopted) then references to the previous Local Plan should be removed for clarity. It is appreciated that the timetable relating to the Local Plan examination is outside of the Parish Council’s control.</p> <p>Bloor Homes is supportive of the draft vision and aims set out within the Neighbourhood Plan. In particular the reference to supporting “sustainable housing development, to meet the diverse needs of the existing and future community.” It is noted that the plan does not itself identify specific allocations, rather it leaves this to the Local Plan.</p> <p>Paragraph 3.3.2 acknowledges that whilst Bilbrook is located within the Green Belt, SSDC’s emerging Local Plan proposes to release Green Belt to the east of Bilbrook and allocate a Strategic Development Location (SDL) on land in the control of Bloor Homes. Bloor Homes is supportive of the reference within the draft plan to this strategically important site for the district.</p>	<p>Comment Noted.</p> <p>Comments noted.</p> <p>Comments noted.</p>
<p>Policy BB01: Residential Development</p>	<p>Evolve Planning</p>	<p>Bloor Homes supports the overall approach Policy BB01 (Residential Development) which allows for development within the existing development boundary and sites allocated within the Local Plan. This provides sufficient flexibility to provide support for those sites proposed through the emerging Local Plan. The development boundary identified in Figure 1 illustrates the development boundary which is consistent with that set out in the emerging Local Plan and is contiguous with the proposed release of Green</p>	<p>Comments noted.</p>



		<p>Belt and strategic allocation to the east of Bilbrook. Such an approach is supported and considered appropriate in the context of both the emerging and adopted Local Plan.</p> <p>Criteria 3 of the policy requires residential development to help in meeting the “diverse needs including family housing and smaller dwellings for first-time buyers or those wishing to downsize”. Such an approach broadly conforms with the adopted and emerging Local Plan which seeks to secure a housing mix including smaller properties to meet district wide needs. However, Bloor Homes considers that such an approach is not justified. This approach is ‘needs’ based and does not reflect the range of lifestyle influences that go beyond the number of bedrooms needed to accommodate household size. For example, the need for a home office, spare bedroom to accommodate guests or flexibility to allow for changing household size over time. It does not account for the aspirational nature of home ownership. Therefore, it is recommended that the policy ensures it is sufficiently flexible in respect of housing mix to allow for development to come forward and respond to market signals.</p>	<p>The Interpretation already recognises that housing layouts should be flexible for differing needs, including home working. This advice has been augmented to take account of the comment. Reference to Nationally Described Housing Standards removed.</p> <p>Clause on affordable housing provision already deleted in response to LPA comments.</p>
<p>Policy BB03: Green and Blue Infrastructure</p>	<p>Evolve Planning</p>	<p>Bloor Homes has strong concerns regarding the currently proposed wording of Policy BB03 (Green and Blue Infrastructure). The policy seeks to require development to provide a minimum 20% Biodiversity Net Gain (BNG). Such an approach is in excess of the minimum 10% which is required by national policy and legislation. Additionally, the emerging Local Plan for the district, through Policy NB2 (Biodiversity) requires a minimum 10% net get which is consistent with national policy.</p>	<p>Clause already deleted in response to other comments.</p>



<p>Policy BB04: Heritage</p>	<p>Evolve Planning</p>	<p>Policy BB04 (Heritage) seeks to identify a number of non-designated heritage assets within the plan area. Bloor Homes supports the desire for the Neighbourhood Plan to identify non-heritage assets through locally distinctive policies, an approach supported by national policy and guidance and guidance from Historic England.</p> <p>However, it is important that accompanying evidence which supports and justifies the identification of any non-designated assets is provided. The PPG Paragraph: 040 Reference ID: 18a-040-20190723) requires the identification of non-designated assets through Neighbourhood Plans to be based on sound evidence and that information regarding the assets should be accessible to provide clarity and certainty for developers and decision-makers. No such evidence has been presented in support of the draft plan.</p> <p>It would be beneficial to include a map or plan within the Neighbourhood Plan which identifies the locations of the buildings and structures identified within the policy.</p>	<p>Comments noted.</p> <p>The supporting evidence report was added to the website and everyone who made representations was informed and consultation was extended.</p> <p>Map added to Interpretation to policy. List of non-designated assets in clause 1 amended to include name and street address of each asset.</p>
<p>Policy BB05: Place and Design</p>	<p>Evolve Planning</p>	<p>Policy BB05 (Place and Design) provides guidance for developers in respect of design. Bloor Homes is supportive of the general thrust of the policy which seeks to encourage good design within the Neighbourhood Plan. The draft policy includes a flexible approach proportionate to the nature and scale of a development which is supported.</p> <p>3.23 The explanatory text to the policy notes that a Bilbrook Design Codes document has been prepared to support the Neighbourhood Plan. However, the document was not available for review during the consultation as such, Bloor Homes reserves the right to make further comments upon the design policy and its supporting evidence at a later date.</p>	<p>Comments noted.</p> <p>The supporting evidence report was added to the website and everyone who made representations was informed and consultation was extended.</p> <p>The content of the design code has been translated into various policies</p>

			including the design policy.
Policy BB06: Transport and Active Travel	Evolve Planning	Bloor Homes is supportive of the draft policy which seeks to encourage sustainable transport and active travel.	Comments noted.
Policy BB07: Local Green Spaces	Evolve Planning	Bloor Homes supports the designation of the Local Green Spaces within the Neighbourhood Plan. The designations will need to be supported by appropriate evidence which demonstrates how the designations meet the test set out in national policy and therefore meet the Basic Conditions. Such evidence must be published and available for consideration at the Local Authority Publicity (Regulation 16) consultation stage.	Comments noted. The supporting evidence report was added to the website and everyone who made representations was informed and consultation was extended.
Conclusions/ General	Evolve Planning	As set out within these representations, Bloor Homes is generally supportive of the approach being taken by the Parish Council in the preparation of its plan. However, it has some concern in respect of the submitted Neighbourhood Plan where it considers the Basic Conditions against which it must be examined have not been met.	Where necessary the Plan has been amended to meet the Basic Conditions as set out above.
General	First City	We welcome the opportunity to submit representations to the Bilbrook Neighbourhood Plan. We have submitted representations to the Local Plan at the various consultation stages, promoting the site for residential development as we consider the site would be suitable to accommodate additional dwellings to support local need in a sustainable location.	These comments appear to relate to the emerging Local Plan. No change.



<p>Policy B801: Residential Development</p>	<p>First City</p>	<p>We consider it is important to acknowledge the policies within the Local Plan and the necessity of consistency. "A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework)." National Planning Policy Guidance Paragraph: 004 Reference ID: 41-004-20190509.</p> <p>However, it is also important to understand there is an opportunity for the Neighbourhood plan to promote and influence more development at a local level. We therefore consider greater opportunities for the selection of additional sites over and above those set out in the Local Plan review could have been identified. This extends to those outside of the development boundary where there is opportunity to work with the landowners and ensure the needs of the community are considered (including the provision of a variety of types of housing) and that would potentially qualify as special circumstances to justify the inclusion of additional sites outside of the boundary in addition to those within the existing development boundary.</p> <p>My clients land off Manor House Park, has the capacity to provide approximately 66 dwellings and designated open space. The mix of dwellings on site would be to meet the local community and would include bungalows and affordable housing, in addition to family housing and smaller 2 bedroom properties in a sustainable location.</p>	<p>The Neighbourhood Plan does not make site allocations but does support development within the settlement boundary. It should be noted that much of the parish is Green Belt, so site allocations could not be made by a Neighbourhood Plan.</p> <p>The Neighbourhood Plan does support small housing.</p>
<p>Policy BB03: Green and Blue Infrastructure</p>	<p>First City</p>	<p>We object to policy BB03: Green and Blue Infrastructure 3 which states, "Biodiversity protection and enhancement via major developments providing a minimum 20% onsite Biodiversity Net Gain appropriate to the local ecology. Any net gain remaining, which is evidenced and agreed as not possible to deliver onsite, should be delivered within existing green and blue corridors within the Plan area"</p> <p>National guidance and legislation currently states "What BNG is? BNG is an approach to development. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development.</p> <p>In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as</p>	<p>Clause already deleted in response to other comments.</p>

		<p>inserted by Schedule 14 of the Environment Act 2021).</p> <p>Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development. Understanding biodiversity net gain https://www.gov.uk/guidance/understanding-biodiversity-net-gain</p> <p>The neighbourhood plan is therefore requesting an 100% increase on the national requirement which we consider to be excessive and unnecessary. With the increase in demand for additional net gain, this has a risk of rendering some site unviable in being able to provide development and the biodiversity net gain. This would therefore hinder the deliverability of the overall plan and impact the Local Plan negatively. The National Planning Policy Framework (NPPF), December 2024 paragraph 30 states, "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies". We therefore consider Policy B803 results in the Neighbourhood plan being contrary to both local and national planning policy and therefore unsound.</p>	
<p>Policy B807: Local Green Space</p>	<p>First City</p>	<p>We object to the inclusion of my client's land (your ref BB04 Hubbard's Field) as a local green space site. My client has not been consulted in regard to the current or previous consultations to discuss the inclusion of their land as local green space. To date no public access has been granted on the site by the owners and unfortunately the boundary treatments have been damaged and the general public are trespassing on the site.</p> <p>As part of the proposed scheme for residential development on the site an area of public open space/ nature conservation would be incorporated, that would be landscaped to provide an attractive and recreational area allowing both flora and fauna to thrive and be enjoyed by local residents in a safe and appropriate manner.</p>	<p>Comments noted.</p> <p>The Local Green Space Assessment report provides the analysis and justification of each space against the NPPF criteria.</p> <p>As part of the process, all owners of Local Green Space were written to and invited to respond. The letter was dated 15th June 2023.</p>

		<p>Please find attached a proposed layout of the site which emphasizes the many benefits of developing this sustainable site would achieve. Development of the site in this way would provide much needed local housing but at the same time allow for the creation of a valuable nature conservation area and public open space.</p>	<p>PRoW 'Bilbrook 2' crosses through the site and over the stream. There are also a number of permissive paths as shown on the O.S base mapping data.</p> <p>This would be a matter for the Local Plan.</p>
BB01 Residential Development	JK WV8 1ES	<p>I agree with policy BB01. I would also suggest including the following provisions:</p> <ul style="list-style-type: none"> • Any new housing built should be given to current South Staffordshire residents, with priority given to Bilbrook residents. • Provision for specialist housing accommodation for older people should be included in any new development, especially given the age profile of residents in the village. 	<p>Comments noted.</p> <p>The Neighbourhood Plan can't specify who occupies housing.</p> <p>The policy already supports specialist housing accommodation for older people and those with disabilities, including sheltered accommodation.</p>
BB02 Neighbourhood Centres	JK WV8 1ES	<p>Given the scale of the proposed housing development, the village's identity will be further compromised. I am in favour of policy BB02.</p>	<p>Comment noted.</p>



<p>BB03 Landscape and Natural Environment</p>	<p>JK WV8 1ES</p>	<p>Bilbrook is within the worst 8% of England for access to natural greenspace and has very low greenspace/access provision. The proposed development on land East of Bilbrook will further degrade that position.</p> <p>I believe that getting approval for the proposed right-of-way route requested in 2021, as shown on page 26, Figure 9 (Bilbrook's Active Travel Routes) should be a priority. In addition, I believe the footpaths shown in Figure 9 that are described as 'non-designated in regular use' should also be protected.</p> <p>I support policy BB03.</p>	<p>Policy BB05 'Place and Design' already deals with green spaces and planting.</p> <p>New clause added to the beginning of Policy BB03 to provide protection for existing green and blue infrastructure.</p> <p>A list of key landscape features have been added to the planning rationale.</p> <p>Comment noted.</p>
<p>BB04 Heritage</p>	<p>JK WV8 1ES</p>	<p>I support policy BB04. All the identified sites should be protected. I am surprised that for a village listed in the Domesday Book has no significant scheduled sites or monuments left.</p>	<p>Comment noted.</p> <p>There are no scheduled sites or monuments recorded within the Neighbourhood Area. There are Listed Buildings and non-designated heritage assets in the Neighbourhood Area.</p>
<p>BB05 Place and Design</p>	<p>JK WV8 1ES</p>	<p>I support policy BB05.</p>	<p>Comment noted.</p>



BB06 Active Travel	JK WV8 1ES	<p>I support policy BB06. However, I am very concerned about the negative impact of the proposed development on land East of Bilbrook on pedestrian safety and traffic congestion. The existing road network is inadequate for the current traffic volume, so any further development will exacerbate the situation, particularly in the centre of the village near the Woodman Inn.</p> <p>There is a low level of public transport from the village centre to other parts of the district. For those driving to the village, there is limited free parking, with the exception of the Woodman Inn, which is reserved for customers only.</p>	Comments noted.
BB07 Local Green Space	JK WV8 1ES	<p>I agree with policy BB07, including the list of spaces that should be designated as Local Green Spaces. It is essential for those spaces to be protected from any development.</p>	Comment noted.

POLICY	COMMENTOR STATUS	COMMENTS	BILBROOK PARISH COUNCIL RESPONSE
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	<p>800+ houses in bilbrook will destroy this village. The village does not have the infrastructure to support the 15% increase in population. And this development will lead to increase pollution, destruction of local wildlife and a complete over crowding in a small village.</p>	<p>The Neighbourhood Plan supports development in the settlement boundary, but does not make site allocations. The comment appears to relate to the Local Plan rather than the Neighbourhood Plan.</p>
BB01 RESIDENTIAL DEVELOPMENT	Other stakeholder	<p>Not sure why the parish council are endorsing the building of 843 houses in bilbrook? Surely you understand that increasing the population. Of the village by an extra 2000 people will completely destroy the village.</p>	<p>The Neighbourhood Plan supports development in the settlement boundary, but does not make site allocations. The comment appears to relate to the Local Plan</p>

		Where will the kids go to school? Doctors appointment, dentists? Increase pollution, environment and wildlife eradicated. I just think this government just want to build houses regardless of the consequences.	rather than the Neighbourhood Plan. The Parish Council objected to the Local Plan site allocation and shares the concern over community infrastructure provision.
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	Maintain the greenbelt. Stick to the minimum allocation and balance of housing – the main roads in the village are already extremely busy with motor bikes through to tractors and articulated lorries which cause all manner of pollution (noise, air) as well as wear and tear.	The Neighbourhood Plan cannot release Green Belt. Transport and movement is dealt with by policy BB06.
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	It's a shame we need so much development at all, but at least this should give us what we need rather than what anonymous developers want.	Comments noted.
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	I agree with policy BB01. I would also suggest including the following provisions: 1. Priority for any new housing built should be given to the existing residents of Bilbrook first. (I think this is logical, given that one of the main arguments put forward by the South Staffordshire Council is the supposed demand from existing residents in Bilbrook for new housing). 2.I agree that provision for specialist housing accommodation for older	The Neighbourhood Plan can't specify who occupies housing. Comment noted. Although there is a Housing Needs

		<p>people and those with disabilities, including sheltered housing schemes, should be included in any new development. However, to ensure that this happens and is proportionate, I think it would be beneficial to state that a specific percentage of the total number of dwellings in any new development is allocated for this purpose.</p>	<p>Assessment at Parish level, the Local Authority has raised concerns over general conformity with strategic local policy and viability, so it is not possible to include a percentage within the policy.</p>
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	<p>I agree with the policy. New developments are needed if we want our children to remain in the same place they were born, close to their extended family. However, they must be built in a sustainable way, using materials which cause the least harm to the planet, using renewable energy to heat and cook with. Active travel must be easiest choice of transport, designed into these developments, with good public transport links to enable people to move further afield in the most sustainable, safest and healthiest way.</p>	<p>A green guidance note is included in the Plan and a design policy also supports green design.</p> <p>Agreed, policies BB05 and BB06 support and promote active travel.</p>
BB01 RESIDENTIAL DEVELOPMENT	Bilbrook Resident	<p>I agree with Policy BB01.</p> <p>I would also suggest the following provisions; 1. Any new housing built should be given to current South Staffordshire residents, with priority given to Bilbrook residents.</p> <p>2. Provision for specialist housing accommodation for older people should be included in any new development, especially</p>	<p>Comments noted.</p> <p>The Neighbourhood Plan can't specify who occupies housing.</p> <p>The policy already supports specialist housing accommodation for older people and those with disabilities,</p>

		given the age profile of people in the village.	including sheltered accommodation.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	Not sure why we need these in my view they are completely pointless.	The earlier community engagement exercises indicated that many residents value the neighbourhood centres.
BB02 NEIGHBOURHOOD CENTRES	Other stakeholder	Think the proposal is awful	The nature of objection to the policy is unclear. The policy seeks to protect the vitality of the Neighbourhood Centres, no change.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	Bilbrook already has a diversity of shops, food outlets and entertainment venues. The key missing venue is a 'drop in' centre for young people, and a banking hub would be useful.	Comment noted. The policy would support new community facilities, such as those mentioned.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	Good policy.	Comment noted.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	Given the scale of the proposed housing development, I believe it is inevitable that it will severely compromise the village's identity. However, regarding the existing Bilbrook Road and Duck Lane Centres, my primary concern is that if the land East of Bilbrook is developed without proper infrastructure, it will exacerbate traffic congestion in the existing centres and strain the already limited parking facilities.	The Neighbourhood Plan supports development in the settlement boundary, but does not make site allocations. The comment appears to relate to the Local Plan rather than the Neighbourhood Plan. The Parish Council objected to the Local Plan site allocation and shares the concern over community infrastructure provision.

		I am in favour of policy BB02.	Comment on BB02 noted.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	I agree with the policy. Our village centres are the heart of the community and need to be preserved as such and not allowed to be splintered or over-developed. They should be improved to make them more accessible to everyone and become more of a meeting and gathering place rather than just somewhere to park your car and buy convenience goods or fast food.	Comment noted.
BB02 NEIGHBOURHOOD CENTRES	Bilbrook Resident	Given the scale of the proposed housing development, the village's identity will be further compromised. I am in favour of policy BB02.	Comment noted.
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Bilbrook Resident	Awful design	It is unclear how the comment relates to the policy.
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Other stakeholder	Destroying the local environment is a disgrace	The policy seeks to protect the local environment.
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Bilbrook Resident	Compliment and enhance. Create healthy living spaces - trees along roads helping to combat vehicle pollution.	These matters are dealt with by policies BB03 and BB05.
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Bilbrook Resident	Good policy.	Comment noted.
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Bilbrook Resident	Bilbrook is within the worst 8% of England for access to natural greenspace and has very low greenspace/access provision, due in part to the paucity of formal rights of way. Given this, I believe that	Policy BB05 'Place and Design' already deals with green spaces and planting. New clause added to the beginning of Policy BB03 to provide

		<p>getting approval for the proposed right-of-way route requested in 2021 (Bilbrook's Active Travel Routes) should be a priority. In fact, I am surprised that approval has not already been granted, as I see the request was made four years ago!</p> <p>In addition, I believe the footpaths shown in Figure 9 that are described as 'non-designated in regular use' should also be protected.</p> <p>I disagree with taking land from the Green Belt for housing development when there are plenty of brown sites available nationally. The fact that is acknowledged that Bilbrook is within the worst 8% of England for access to natural greenspace and has very low greenspace/access provision makes this proposed development very concerning, since it will significantly degrade that position by consuming yet more of the current available green space.</p> <p>However, I agree with policy BB03 that any development within the plan boundary should protect and enhance the area's green infrastructure in an appropriate manner. This includes meeting all the deliverables, including a minimum BNG gain of 20%.</p>	<p>protection for existing green and blue infrastructure.</p> <p>A list of key landscape features have been added to the planning rationale.</p> <p>Policy BB06 deals with active travel and protection of public rights of way.</p> <p>The Neighbourhood Plan does not make site allocations but does support development within the settlement boundary. It should be noted that a Neighbourhood Plan cannot release Green Belt, and this is not proposed in the Plan. The comment may relate to the Local Plan.</p> <p>Comment noted. However, the BNG 20% requirement has had to be deleted in response to other comments.</p>
BB03 GREEN INFRASTRUCTURE	Bilbrook Resident	I agree with the policy. Our natural spaces are diminishing at an alarming	Comment noted.

(LANDSCAPE AND NATURAL DESIGN)		rate along with the wildlife which inhabits it. Our connection to wildlife is being lost and we value its importance less as each year goes by. Developments must not be allowed to destroy or fragment important habitats and it's vital that we create new ones, connect all of these important places together to allow wildlife to transit easily between them and make it easier for us to connect with wildlife on a more frequent basis.	
BB03 GREEN INFRASTRUCTURE (LANDSCAPE AND NATURAL DESIGN)	Bilbrook Resident	Bilbrook is within the worst 8% of England for access to natural greenspace and has very low greenspace/access provision. The proposed development on land East of Bilbrook will further degrade that position. I believe that getting approval for the proposed right-of-way route requested in 2021 (see Bilbrook's Active Travel routes) should be a priority. In addition, I believe that the footpaths shown as 'non-designated in regular use' should also be protected. I support policy BB03.	<p>Policy BB05 'Place and Design' already deals with green spaces and planting.</p> <p>New clause added to the beginning of Policy BB03 to provide protection for existing green and blue infrastructure.</p> <p>A list of key landscape features have been added to the planning rationale.</p> <p>Policy BB06 deals with active travel and protection of public rights of way.</p>
BB04 HERITAGE	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB04 HERITAGE	Bilbrook Resident	The canal, Nature Reserve, Twentymans playing field, etc are crucial in what makes Bilbrook, Bilbrook; maintaining and enhancing is vital for their preservation.	Comment noted. Protection of the playing field is dealt with in policy BB07. Policy BB03 has been amended by the addition of a clause protecting landscape and other features which would include

			nature reserves. A list of features has been added to the planning rationale.
BB04 HERITAGE	Bilbrook Resident	This is wonderful! I had no idea about a couple of these places, and it's a great idea to protect them.	Comment noted.
BB04 HERITAGE	Bilbrook Resident	I support policy BB04. I agree with including the buildings and structures listed as non-designated heritage assets should be protected against rapacious development.	Comment noted.
BB04 HERITAGE	Bilbrook Resident	I agree with the policy.	Comment noted.
BB04 HERITAGE	Bilbrook Resident	I support policy BB04. All the identified sites should be protected. I am surprised that for a village listed in the Domesday Book has no significant scheduled sites or monuments left.	Comment noted. There are no scheduled sites or monuments recorded within the Neighbourhood Area. There are Listed Buildings and non-designated heritage assets in the Neighbourhood Area.
BB05 PLACE AND DESIGN	Bilbrook Resident	Design just looks like you are trying to cram as many homes into a small spaces as possible. Terrible design with zero thought.	The comments appear to relate to a specific scheme rather than policy BB05. Policy BB05 does place emphasis on complementing the site and urban context and character of the area.
BB05 PLACE AND DESIGN	Other stakeholder	Design looks very very average. Not saw who is doing this but they need to be replaced with a professional.	The comments appear to relate to a specific scheme rather than policy BB05. Policy BB05 does place emphasis on complementing the site and urban context and character of the area.

BB05 PLACE AND DESIGN	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB05 PLACE AND DESIGN	Bilbrook Resident	Compliment and enhance. Create healthy living spaces - trees along roads helping to combat vehicle pollution.	Comment noted.
BB05 PLACE AND DESIGN	Bilbrook Resident	Good policy	Comment noted.
BB05 PLACE AND DESIGN	Bilbrook Resident	I support Policy BB05.	Comment noted.
BB05 PLACE AND DESIGN	Bilbrook Resident	I agree with the policy.	Comment noted.
BB05 PLACE AND DESIGN	Bilbrook Resident	I support Policy BB05.	Comment noted.
BB06 ACTIVE TRAVEL	Bilbrook Resident	Travel in the village will be even worse and that's without considering the 900+ houses built in codsall less than 3 miles away. Roads will not be able to cope with the extra traffic. Billbrook pot holes are awful more cars will make them even worse	Comment noted. The policy promotes sustainable transport and active travel. The reference to 900+ houses appears to relate to the Local Plan.
BB06 ACTIVE TRAVEL	Other stakeholder	Increase numbers of vehicles will just add to the poor road quality. Also the roads are not designed in the village for the increase of cars/vans.	Comment noted. The policy promotes sustainable transport and active travel.
BB06 ACTIVE TRAVEL	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB06 ACTIVE TRAVEL	Bilbrook Resident	It is good to have the bus service maintained, cycle paths and rail links.	Comment noted.
BB06 ACTIVE TRAVEL	Bilbrook Resident	I hope this policy helps to ensure that we can retain and improve public transport.	Comment noted.
BB06 ACTIVE TRAVEL	Bilbrook Resident	I support policy BB06. I am very concerned about the negative impact of the proposed development on land East of Bilbrook on pedestrian safety and traffic congestion. If 818 new homes are built, that will mean at least 818 cars going through the village, assuming one car	Comment noted. This appears to relate to the emerging Local Plan.

		<p>per household. That is a massive change, especially for narrow village roads, which are already congested because of prior housing developments.</p> <p>Public transport from the village centre is limited. There is just one bus an hour from the Woodman Inn to Wolverhampton during weekdays and the same applies to trains from Bilbrook to Wolverhampton. There is also no parking near the station. I think the new development will add pressure to an already strained transport network and, of course, lead to much more pollution.</p>	<p>Comment noted.</p>
<p>BB06 ACTIVE TRAVEL</p>	<p>Bilbrook Resident</p>	<p>I agree with the policy. We have to break our dependency with the car and make it easier to walk or cycle, especially for short, local journeys. We are in a health crisis caused by our unhealthy diets and increasingly sedentary lifestyles. Exercise is crucial and making it harder to drive our cars for every journey is key to improving our health. Even with more EVs, the danger motor vehicles pose to our safety as well as the congestion they cause means we must walk and cycle more. Not only will this improve our health outcomes but it will improve community cohesion as we will communicate more with our neighbours we see and meet on the street and not just move from one enclosed box to another.</p>	<p>Comment noted. The policy promotes sustainable transport and active travel.</p>

BB06 ACTIVE TRAVEL	Bilbrook Resident	I support policy BB06; however, I am very concerned about the negative impact of the proposed development on land East of Bilbrook on pedestrian safety and traffic congestion. The existing road network is inadequate for the current traffic volume, so any further development with exacerbate the situation, particularly in the centre of the village near the Woodman Inn. There is a low level of public transport from the village centre to other parts of the district. For those driving to the village, there is limited free parking, with the exception of the Woodman Inn, which is reserved for customers only.	Comment noted. The reference to 'land east of Bilbrook' appears to relate to the emerging Local Plan.
BB07 LOCAL GREEN SPACE	Bilbrook Resident	Destroying green space is a disgrace	Comment noted.
BB07 LOCAL GREEN SPACE	Other stakeholder	Destruction of green space is a disgrace and you should hang you head in shame support this build.	Comment unclear, given that the policy protects Local Green Space.
BB07 LOCAL GREEN SPACE	Bilbrook Resident	this policy seems to cover everything needed	Comment noted.
BB07 LOCAL GREEN SPACE	Bilbrook Resident	Bilbrook is fortunate to have access to some beautiful green space. It is vital for these places to be kept well maintained, accessible and promoted; for example Pendeford wood needs caring for and for people to be made aware of its presence within the village.	Comment noted.
BB07 LOCAL GREEN SPACE	Bilbrook Resident	Good policy.	Comment noted.
BB07 LOCAL GREEN SPACE	Bilbrook Resident	Our open spaces are the vital breathing spaces in our	Comment noted.

		<p>communities. They must be preserved and protected. Every development should have open spaces which act as local places to play, gather and bring local communities together. They must be more than just amenity grassed areas which people walk past. They need to be designed and landscaped so they help mitigate the effects of climate change by acting as sponges for extreme wet weather. In addition, they should help mitigate the effects of extreme heat by the careful use of trees and vegetation to provide shading and help reduce the urban island heating effect.</p>	<p>Policy BB05 deals with green infrastructure and public realm in new development.</p> <p>The green guidance note addresses climate change in more detail.</p>
BB07 LOCAL GREEN SPACE	Bilbrook Resident	I agree with policy BB07, including the list of spaces that should be designated as Local Green Spaces that should be preserved.	Comment noted.
BB07 LOCAL GREEN SPACE	Bilbrook Resident	I agree with policy BB07, including the list of spaces that should be designated as Local Green Spaces. It is essential for those spaces to be protected from any development.	Comment noted.
GENERAL COMMENTS	Bilbrook Resident	Overall I think this proposal will destroy billbrook. I'm not sure why you have created this forum.	Meaning of the comment in relation to the Neighbourhood Plan is unclear.
GENERAL COMMENTS	Other stakeholder	Overall the plans with billbrook and codsall and Perron are all horrendous. Zero consideration for the people who actually live here.	<p>Codsall and Perron are outside of the Neighbourhood Area.</p> <p>Meaning of the comment in relation to the Neighbourhood Plan is unclear.</p>



			The comment may relate to the emerging Local Plan.
GENERAL COMMENTS	Bilbrook Resident	The plan is comprehensive, covering all important matters accurately. I am supportive of it.	Comment noted.
GENERAL COMMENTS	Bilbrook Resident	I look forward to seeing this receive its legal status.	Comment noted.
GENERAL COMMENTS	Bilbrook Resident	I am happy to support all of the policies in this plan. Thank you.	Comment noted.

End