

Planning for the future of wildlife in the Black Country

BY SIMON ATKINSON, HEAD OF CONSERVATION

The Wildlife Trust's work to influence where and how new homes are built is critical to our vision of a future Birmingham and the Black Country which has more wildlife, more wild places and more people with a strong connection to the natural world. Building new homes can be an opportunity to learn lessons from the past and create new communities which are better for wildlife and people. The number of new homes planned in the Black Country, however, presents a real threat to wildlife and wild places which must be avoided.

In the next 20 years the urban area of the Black Country is due to expand at a rate not seen since the middle of the 20th century. Studies commissioned by the Black Country local planning authorities have concluded that in the period up to 2038 new land must be found for up to 71,459 homes, whilst an area of 870 hectares will also be required for employment land. Due to be adopted in 2023, the Black Country Plan will allocate the land needed to meet these targets.

The Black Country Plan seeks to deliver:

870 hectares of employment land up to 2038

3,761 new homes each year, or 71,459 homes up to 2038

The identified shortfall - that is the number of new homes which cannot be accommodated in the Black Country urban area - stands at 27,000

To provide the land needed to make up for the shortfall the Green Belt of the Black Country and surrounding counties is being reviewed

Whilst understanding the need to provide new homes and places of work, the Wildlife Trust will strongly oppose any development that will damage or destroy sites that are important to wildlife. We believe that strategic planning must take account of the evidence and not only protect and enhance the ecological network, but also determine how new developments are built. The benefits that green space and wildlife bring to society – be this flood water management or improving people's health and wellbeing - must be recognised and be at the heart of the design of any new housing or industrial estate. Creating high quality green spaces, constructing greener streets and building provision for wildlife into the very fabric of new buildings will help to deliver nature's recovery.

The requirement to provide so much land for new development puts severe pressure on green space not only in the existing urban area, but also on those areas currently protected by the Green Belt. National planning policy requires that Green Belt boundaries must remain unchanged unless it can be demonstrated that 'exceptional circumstances' exist. The Black Country Urban Capacity Review (2019) concluded that the amount of land needed by

2038 is so large that it cannot be found in the existing urban area, and that these exceptional circumstances have now been met. A review of the Green Belt is therefore underway as part of the Black Country Plan process. All parts of the Green Belt, as well as that in surrounding rural areas such as South Staffordshire, is being considered for new development.

Many local communities are deeply concerned that landowners and developers have proposed that parts of the countryside near where they live should be where some of these new homes are built. Passionate individuals have come together, formed groups and are running campaigns to fight to protect these precious local spaces. These are often the places that support some of our best wildlife sites and which give people the opportunity to engage with nature in their everyday lives.

We understand the passion that people feel for their local environment and are fully committed to supporting communities that want to protect their local wildlife and wild places from damage and harm

The Wildlife Trust have provided evidence to the planning authorities that shows just how damaging badly planned developments in the wrong place will be. This, along with other evidence such as the Black Country Green Belt Study and Historic Landscape Characterisation Study, are powerful tools that can be used by everybody to have their say and influence what the future Black Country will be like for wildlife and people.

On the next page you'll find out more about the Black Country Plan process and our work to protect important places. If you or a group you represent would like our support protecting your local wildlife please email us at planning@bbcwildlife.org.uk.

What is the Black Country Plan?

The Government require every local planning authority to produce a local plan to steer future development over a 15 to 20 year period. The Black Country Plan is being jointly produced by the four Black Country councils (Dudley, Sandwell, Walsall and Wolverhampton) and will allocate land for housing and employment up to 2038.

An Ecological Evaluation of the Black Country Green Belt

The Wildlife Trust and EcoRecord (the Environmental Records Centre for Birmingham and the Black Country) were commissioned by the Black Country local authorities to undertake an Ecological Evaluation of the Black Country Green Belt. This comprehensive study analysed a wide range of datasets and assigned a relative ecological value from 1 (low) to 5 (very high) to individual parcels of land (landscape units). Datasets used in the analysis included land use, habitat features, existing nature conservation designations and position in the landscape.

The map to the right depicts an area of the Dudley green belt to the south of Halesowen. This shows that most of this area is of very high or high ecological value and that any new development in this area would therefore be seriously damaging to wildlife.

Also shown on the map are ‘promoted sites’. These are areas of land that have been put forward as potential development sites through the call for sites process.



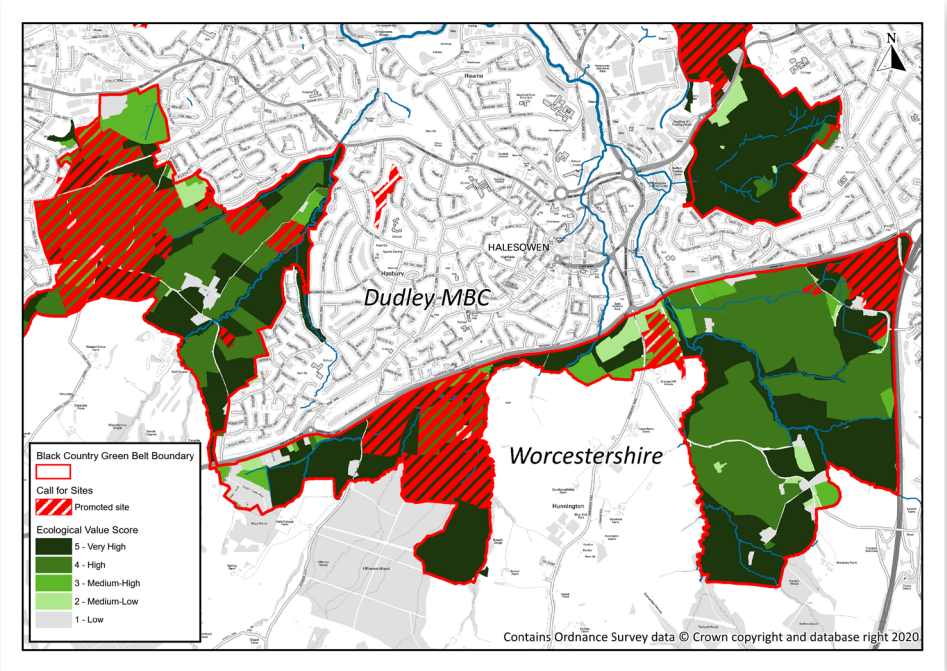
RED DEER IN WALSALL | SIMON ATKINSON

As part of the process a ‘call for sites’ exercise opened in July 2017 and closed in June 2019. The councils requested submissions from anyone who wanted their sites to be considered for development as part of the Black Country Plan.

Details of all the sites that have been put forward for consideration can be viewed at <https://blackcountryplan.dudley.gov.uk/t2/p3/>

Black Country Plan Timetable

Planned stage	Date
Consultation on Draft Plan	Oct/Nov 2020
Consultation on the Publication version Plan	Sept 2021
Submission of Plan	Feb 2022
Examination in Public	Nov 2022
Adoption	Mar 2023



Evidence the Wildlife Trust has provided to inform the Black Country Plan process

Local Site Assessment Reports are used to determine if a site should be designated as a Site of Importance for Nature Conservation (SINC) or Site of Local Importance for Nature Conservation (SLINC).

The Wildlife Trust has been commissioned by Sandwell, Walsall and Wolverhampton councils to undertake approximately 60 Local Sites Assessments, whilst Dudley Council have undertaken these themselves.

In the Black Country Plan process SINCs are considered an ‘absolute constraint’ on development, whereas, unfortunately, SLINCs are not. The Local Site Assessment

Reports are yet to be made public but will be available once these have been endorsed by the Local Sites Partnership and formally adopted by the respective local authority.

The Wildlife Trust and EcoRecord’s Ecological Evaluation of the Black Country Green Belt (see above) forms part of the Black Country Plan evidence and is available to view or download at on the Black Country Plan website.

As with the other evidence, this will be used by the local authorities to inform their proposed allocations of new housing and employment land in the Green Belt.



What we want to see in the Black Country Plan

- A Nature Recovery Network map and plan to be produced, with opportunities to restore, enhance and create habitats identified
- The benefits that green space and nature bring to society to be recognised through adopting a ‘natural capital’ approach to strategic landuse planning
- The regeneration of town centres as desirable and vibrant residential areas, reducing pressure for new residential developments elsewhere
- Full account to be taken of all the evidence provided for the Green Belt review, with only sites of low ecological value considered for new development
- Strong environmental policies implemented across the whole Black Country
- Sites to be released in stages to avoid allocating land for development that may later be found to be unnecessary
- Recognition of the value that individual brownfield sites can have for wildlife and people
- A commitment to meet the 10% biodiversity net gain target for all new developments, in accordance with the draft Environment Bill
- Some of the profits from new developments invested in creating new wildlife-rich green spaces
- SLINCs as well as SINCs should be considered an ‘absolute constraint’ on development

Have your say

Information on the process of producing the Black Country Plan (including the evidence published to date) is available online at <https://blackcountryplan.dudley.gov.uk/t2/>. This states that the local planning authorities aim to have a public consultation on the Draft Plan in autumn 2020, giving members of the public the opportunity to comment on both the Draft Plan, proposed land allocations and the evidence base. We will let all our supporters know when the consultation goes live through our website, magazine, e-newsletter and social media. We will share our own response before the consultation period ends.