

Draft Black Country Plan Consultation Response

The Wildlife Trust for Birmingham and the Black Country, October 2021

The Wildlife Trust for Birmingham and the Black Country (WTBBC) welcome the opportunity to respond to the Draft Black Country Plan (BCP) consultation.

Our response follows the section and paragraph numbering of the BCP as published, however, only those parts of the BCP that we have responded to are included. For each response given we have preceded this with either Support, Object or Comment as requested in the How to Comment section of the Black Country Plan website.

WTBBC understands that any written submission will be transferred by the Black Country Authorities (BCA) to their digital consultation database which has a 100 word limit per response. Each of our responses has therefore been limited to 100 words.

There is significant repetition in our responses. This is because many of these are relevant across a number of policies and should therefore be repeated throughout the Publication Black Country Plan. Furthermore, it is our understanding that responses to individual policies, for example, will be collated and considered in isolation from other responses submitted by an individual or organisation. It is therefore important to respond with the same or similar points wherever in the BCP these are relevant.

Every effort has been made to ensure the accuracy of the data and information used to inform our consultation response and to provide comments that are current and accurate. Nevertheless, inadvertent errors in information may occur and should WTBBC be made aware of any such errors we will correct the relevant comments accordingly.

1 Introduction

Why does the Black Country need a Strategic Plan?

1.4

Comment: A point should be added stating that the BCP will provide a policy framework to support the commitments of the government's 25 Year Environment Plan and the delivery of the West Midlands Combined Authority Natural Environment Plan.

Comment: A point should be added stating that the BCP will provide a policy framework that recognises, encourages investment in and capitalises on the value and benefits that the natural environment provides to the communities of the Black Country.

Duty to co-operate

Comment: Under the duty to cooperate local authorities are required to cooperate with Local Nature Partnerships (LNPs) and must have regard to their activities when preparing local plans. This requirement is the same as that for Local Enterprise Partnerships. No reference is made in the BCP to the Birmingham and Black Country LNP and no evidence is provided in the Statement of Consultation that the LNP was consulted.

This contrasts to the section Black Country Local Enterprise Partnership (1.11 and 1.12) in the BCP, and to the evidence provided in the Statement of Consultation that the LEP was consulted at length.

Black Country Spatial Portrait

Comment: A paragraph should be added that describes the natural landscape of the Black Country.

The Black Country Spatial Portrait recognises the significant influence that industrial heritage has on today's physical environment but not the geological resources that shaped that industry and the pattern of settlement it left behind.

WTBBC welcomes the reference to the influence of the natural environment on health and wellbeing, however, the richness and value of the existing natural environment of the Black Country should be both described and celebrated in a standalone natural environment paragraph.

Challenges and Issues

1.43

e) Climate change and protecting and enhancing the environment

Support: WTBBC welcome the BCP's recognition of the need to address the challenge of mitigating and adapting to the impacts of climate change. WTBBC also welcome recognition of the need to create a strategy for the enhancement and protection of the Black Country's environment. Explicit reference should be made, however, to the natural environment.

This paragraph could be further strengthened through an explicit recognition of the wide range of benefits (ecosystem services) that the natural environment provides the Black Country, and the need to further understand and invest in green infrastructure to maximise benefits in mitigating and adapting to climate change.

h) Health and Wellbeing

Support: WTBBC welcome the BCP's recognition of the role of the environment in shaping the social, economic and environmental circumstances that determine health and wellbeing. Explicit separate references should be made, however, to the built and natural environment.

2 The Black Country 2039: Spatial Vision, Strategic Objectives and Strategic Priorities

Vision for the Black Country

2.3

Comment: It is WTBBC's view that the Vision for the Black Country '*Creating a prosperous, stronger and sustainable Black Country*' could equally apply to the aspirations of any place at any given time. A more localised, unique and ambitious vision should be given which sets the Black Country apart and more directly responds to *What is driving the Vision for the Black Country?* (2.1).

Comment: WTBBC advocates for a vision that puts the natural world at the centre of decision making and a green transformation of the Black Country. The Black Country landscape should meet the needs of all those who live, work in or visit the area by delivering a prosperous and healthy environment that provides the livelihoods, homes and lifestyles they aspire to.

Figure 1 Relationship between Vision and Objectives

Comment: WTBBC welcome the equal value that is given to the eight objectives, and that climate change and the natural environment are recognised as being of equivalent importance to housing, economy and transport.

WTBBC are of the view that the built and natural environment are, however, distinct in this context and that the BCP would be stronger and more impactful if these were included as separate objectives.

Table 1 – Black Country Plan - Objectives and Strategic Priorities

Comment:

- **Climate Change:** WTBBC welcome enhancing the Black Country's Green and Blue Infrastructure, however, investing in nature-based solutions should also be included.
- **Improving the Health and Wellbeing of residents and promoting social inclusion:** WTBBC welcome providing a built and natural environment that supports the making of healthier choices, however, equal access for all to high quality natural green space should also be included.

WTBBC welcome providing a natural environment that protects health and wellbeing and the reference to the benefits to society this provides.

Comment:

- **Enhancing our natural & built environment:** WTBBC welcome the protection and enhancement of the natural environment, biodiversity, wildlife corridors, geological resources, countryside, and landscapes, whilst ensuring that residents have good access to interlinked green infrastructure.

WTBBC welcome protecting, sustaining and enhancing the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places.

WTBBC are of the view, however, that the BCP would be stronger if the built and natural environment are included as separate objectives.

3 Spatial Strategy

Introduction

3.1

Support: WTBBC support the aim of the plan to ensure the Black Country benefits from the right development in the right place at the right time, and that this will meet the needs of people living and working in the Black Country, while protecting and enhancing the environment and the unique character of the area.

WTBBC are of the view that this aim would be stronger and more impactful if this read ...protecting and enhancing the natural and built environment and the unique character of the area.

Figure 2 - Key Spatial Diagram

Comment: On the Key Spatial Diagram it is difficult to distinguish Core Regeneration Areas from the Black Country Green Belt. Furthermore, the diagram depicts only selected development allocations, which doesn't make the cumulative extent of the impact of these on the landscape clear. It should be made clear in the key that the diagram only shows a selected number of allocations, or alternatively all allocations should be depicted as points.

Policy CSP1 - Development Strategy

2d

Object: The statement 'Delivering a limited number of Neighbourhood Growth Areas in highly sustainable locations on the edge of the Urban Area' underplays the impact on the Black Country landscape of these allocations. The term Neighbourhood Growth Areas refers to large-scale developments on greenfield sites and this should be clear. It should also be clear that these allocations are predominantly in the existing green belt.

2f

Support: WTBBC support protecting the Black Country's character and environmental assets including heritage assets, natural habitats and open spaces.

2g

Comment: The statement minimising and mitigating the likely effects of climate change should be expanded to reference the multiple benefits of green infrastructure in minimising and mitigating the likely effects of climate change and utilising nature-based solutions to meet this aim.

Justification

Object: No reference is made in this section to evidence commissioned by and provided to the BCA in their preparation of the BCP by WTBBC.

In October 2019 WTBBC and EcoRecord (the Local Environmental Records Centre) submitted An Ecological Evaluation of the Black Country Green Belt. This comprehensive study analysed a wide range of datasets and assigned a relative ecological value to individual landscape units.

This report was subsequently published on the Black Country Plan website as part of the Evidence Base, however, no reference is made to its findings being used in the Development Strategy or Site Assessment process.

Object: No reference is made in this section to evidence commissioned by and provided to the BCA in their preparation of the BCP by WTBBC.

In April 2021 WTBBC and EcoRecord (the Local Environmental Records Centre) submitted a Draft Local Nature Recovery Opportunity Map (and a description of the components of this) which has been published as Appendix 18 in the BCP.

No reference is made to its findings being used in the Development Strategy or Site Assessment process.

3.5

Comment: WTBBC have concluded through analysis of data that not all the sites allocated for development in the BCP are sustainable and deliverable. Furthermore, from a biodiversity and ecological network perspective some of these do, indeed, breach the environmental capacity of the area. These statements if made should be caveated with a statement that this is the view of the BCA. Further detail of the findings of our analysis are given in our response to individual allocations.

3.7

Comment: It is WTBBC's view that the Spatial Options Paper oversimplifies the spatial options available to the BCA in their preparation of the BCP. Whilst WTBBC support the approach of Option J Balanced Growth with its emphasis on focusing growth within existing residential and employment areas alongside a limited number of new growth areas, this option should not be pursued to the exclusion of Option G Garden Village/Urban Greening. WTBBC support Option G's focus on more open space which supports the Nature Recovery Strategy (funded by BNG) and this approach should be followed in all Neighbourhood Growth Areas in the BCP.

Evidence

Object: The evidence commissioned by and provided to the BCA in their preparation of the BCP by WTBBC should be included in this list:

- An Ecological Evaluation of the Black Country Green Belt (2019)
- Draft Local Nature Recovery Opportunity Map and component descriptions (2021)

Policy CSP2 – The Strategic Centres and Core Regeneration Areas

3b

Support: WTBBC support the recognition of the value of a high quality natural environment in Strategic Centres and the inclusion of this in Policy CSP2.

4d

Support: WTBBC support the recognition of the value of linked comprehensive networks of attractive green infrastructure in Core Regeneration Areas linking the Strategic Centres and the inclusion of this in Policy CSP2.

Policy CSP3 – Towns and Neighbourhood Areas and the green belt

1bi and 1d

Object: The statement 'A network of new Neighbourhood Growth Areas providing 6,792 homes, in highly sustainable locations on the edge of the Urban Area' underplays the impact on the Black Country landscape of these allocations. The term Neighbourhood Growth Areas refers to for large-scale developments on greenfield sites and this should be clear. It should also be clear that these allocations are predominantly in the existing green belt.

1e

Comment: WTBBC support the aim of delivering an integrated and continuous (where possible) network of green infrastructure, walking and cycling routes. The importance of this should be emphasised through it being in a separate point to a network of centres, health, leisure and community facilities.

1g

Comment: WTBBC support a defensible green belt to help promote urban renaissance within the urban area and that provides easy access to the countryside for local residents. WTBBC do not support the use of 'where possible' in reference to the landscape being safeguarded and enhanced for its heritage, recreation, agricultural and nature conservation value. This caveat allows for the redrawing of green belt boundaries as proposed elsewhere in the plan, but its use here weakens the BCA's assertion that the green belt is valued for the benefits it provides the Black Country.

Justification

3.48

Comment: WTBBC support that individual sites (as defined in Policy CSP3) in each of the Neighbourhood Growth Areas are master-planned together. Reference should be made in this paragraph not only to infrastructure needs but also to green and blue infrastructure provision. Furthermore, the collaborative process for masterplanning as set out in the paragraph should include reference to relevant natural environment stakeholders such as the Local Nature Partnership.

Green belt

Comment: WTBBC support the recognition of the valuable contribution that surrounding countryside and the network of green wedges and corridors provides the Black Country. WTBBC do not support the use of 'where practical and possible' in reference to the landscape, nature conservation and agricultural land being protected and enhanced. This caveat allows for the redrawing of green belt boundaries as proposed elsewhere in the plan, but its use here weakens the BCA's assertion that the green belt and the network of green wedges and corridors is valued for the benefits it provides the Black Country.

Policy CSP4 - Achieving well-designed places

Comment: A point should be added to the policy that directly references the statement made in Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain that all development shall deliver the Local Nature Recovery Network Strategy, and that these will take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone.

6

Support: WTBBC support the pursuance of an integrated and well-connected multifunctional open space network. This point links with Policy ENV8: strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network. WTBBC are of the view that to fully realise many of the BCP's aspirations that mapping of the existing multifunctional green space and greenway network should be undertaken in parallel with the Local Nature Recovery Strategy. This will enable targeted investment in the network which maximises biodiversity, social and a range of other ecosystem services benefits.

Support: WTBBC support the recognition of the value of protecting and enhancing the Black Country canal network in achieving well-designed places.

Justification

Comment: It is WTBBC's view that a paragraph should be added to this section that highlights the value of the natural environment and green and blue infrastructure in achieving well-designed places. Furthermore, this should acknowledge the value of the ecosystem services the natural environment provides the Black Country, and state that this will be invested in to fully deliver well-designed places.

Policy GB1 – The Black Country Green Belt

Comment: It is WTBBC's view that a point should be added to the policy that directly references the statement made in Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain that all development shall deliver the Local Nature Recovery Network Strategy, and that these will take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone.

Justification

Comment: It is WTBBC's view that a paragraph should be added that highlights the Draft Local Nature Recovery Opportunity Map (Appendix 18 of the BCP). The Opportunity Map identifies the importance of the green belt in the ecological network of the Black Country, and allocates all of this to Core Landscapes. The Draft Black Country Local Nature Recovery Strategy (WTBBC and EcoRecord 2021) identifies the key habitats and species in each Core Landscape and prescribes focus actions and measures which seek to enhance and increase the biodiversity value of the green belt.

3.77b

Object: Woodland planting should be removed and replaced with habitat creation appropriate to the location as defined in the Draft Black Country Local Nature Recovery Strategy (WTBBC and EcoRecord 2021). The planting of trees and woodland may not be the most ecologically appropriate form of habitat creation, and any habitat enhancements should be informed by the Priority habitats selected as focus actions in the Draft LNRS. Furthermore, the inclusion of tree planting here is likely to influence masterplanners and developers to propose this as habitat loss mitigation whereas they should be directed by the evidence provided in the Draft LNRS.

4 Infrastructure & Delivery

Delivery Constraints

4.6

Object: WTBBC object to the term brownfield-first being used in the BCP. This suggests all land previously occupied by a permanent structure is low value with regards ecosystem services. In the Black Country many sites of high aesthetic, wildlife or health and wellbeing value are post-industrial or have been previously occupied by a structure. The NPPF is clear in its definition of previously developed land that this excludes sites 'where the remains of the permanent structure or fixed surface structure have blended into the landscape'. This term is widely understood and should be used in place of brownfield throughout the BCP.

4.8

Comment: Paragraph 4.8 acknowledges that greenfield sites are often quicker and easier to develop than sites in the urban area. It is WTBBC's view that in response to this reality sites should be released in phases of five years over the life of the plan, with appropriate urban sites released first, thereby avoiding releasing greenfield sites that may later be found to be surplus to requirement through changes in housing demand. This approach will prevent developers 'cherry-picking' the most profitable greenfield sites at the expense of the green belt and natural environment, whilst ensuring appropriate urban sites are not left undeveloped.

Transport and Access to Residential Services

4.11

Comment: Public open space is not necessarily the same as high-quality natural greenspace and therefore the latter should be added to the list of infrastructure investment that will be required to support development. The value of accessible, high-quality natural greenspace to local communities is increasingly understood. For example, the Dasgupta Review 2021 states that access to green spaces can reduce socio-economic inequalities in health, and cites a longitudinal study covering over 10,000 UK residents that found that living in greener urban space was associated with greater life satisfaction (White et al. 2013).

Policy DEL1 – Infrastructure Provision

Justification

4.24

Comment: Public open space is not necessarily the same as high-quality natural greenspace and therefore the latter should be added to the list of infrastructure provision to ensure future development is sustainable. The value of accessible, high-quality natural greenspace to local communities is increasingly understood. For example, the Dasgupta Review 2021 states that access to green spaces can reduce socio-economic inequalities in health, and cites a longitudinal study covering over 10,000 UK residents that found that living in greener urban space was associated with greater life satisfaction (White et al. 2013).

Policy DEL2 – Balance between employment land and housing

4.30

Comment: WTBBC request that Policy ENV1 – Nature Conservation is added to the list of policies that such development proposals will also need to consider. Reinforcing the requirement for windfall development to consider the Environmental Transformation policies will add further to their significance and ensure developers are considering the purpose of these policies at the earliest stage.

5 Health and Wellbeing

Support: WTBBC support the inclusion of Health and Wellbeing policies in the BCP and the recognition of the importance that strategic planning has in delivering quality of life for those who live, work in or visit the area.

Introduction

5.1

Support: WTBBC welcome the recognition that the built and natural environments are key determinants of health and wellbeing.

Linkages between health and the built and natural environment

Comment: It is WTBBC's view that a paragraph should be added that further describes the importance of the natural environment in determining health and wellbeing. The value of accessible, high-quality natural greenspace to local communities is increasingly understood. For example, the Dasgupta Review 2021 states that access to green spaces can reduce socio-economic inequalities in health, and cites a longitudinal study covering over 10,000 UK residents that found that living in greener urban space was associated with greater life satisfaction (White et al. 2013).

Figure 3 - Determinants of health and wellbeing (Barton and Grant, 2010)

Support: WTBBC support the inclusion of the determinants of health and wellbeing map and the recognition in the BCP of the importance of the natural environment in determining health and wellbeing outcomes.

Policy HW1 – Health and Wellbeing

1h

Comment: WTBBC welcome the recognition in the policy of the importance of protecting, enhancing, and providing new green and blue infrastructure in creating an environment that protects and improves the physical, social and mental health and wellbeing of its residents, employees and visitors. It is WTBBC's view, however, that this is of such significance that a standalone point be added that expands upon this, rather than green and blue infrastructure being combined with sports facilities, play and recreation opportunities.

Justification

5.16

Comment: WTBBC welcome the inclusion of green spaces as an important determiner of health, however, it is WTBBC' view that this should instead read high quality natural greenspace. The value of accessible, high-quality natural greenspace to local communities is increasingly understood. For example, the Dasgupta Review 2021 states that access to green spaces can reduce socio-economic inequalities in health, and cites a longitudinal study covering over 10,000 UK residents that found that living in greener urban space was associated with greater life satisfaction (White et al. 2013).

Evidence

Comment: The Economics of Biodiversity: The Dasgupta Review 2021, HM Treasury, should be added to the documents referenced as evidence.

8 The Black Country Centres

Introduction

Comment: The implicit acknowledgment given in the Black Country Centres introduction and policies regarding changes to retail and the significance this has for the future of these centres should be made explicit. Ongoing reductions in the number of occupied retail and office spaces provides the opportunity - as implied in the BCP - to strategically plan vibrant and desirable leisure and residential centres which support the growth of the Black Country economy. This section of the BCP should more strongly set the scene for the review of the four Strategic Centres Area Action Plans with an ambitious vision for this future.

Comment: The reimagining of Strategic Centres as desirable leisure and residential centres will reduce pressure for these land uses elsewhere. To fully realise this ambitious vision, however, significant planning and investment must be given to green and blue infrastructure. The value of well-planned green and blue infrastructure with regards the services it provides in mitigating the impacts of climate change (e.g. urban heating, pollution and flooding) and the substantial increases in desirability this provides should be made clear. Furthermore, it should be set out in the BCP that this will be a requirement of the review of relevant Area Action Plans.

9 Transport

Introduction

9.2

Support: WTBBC support the recognition in the BCP that a modernised and sustainable transport network is important in helping to address the climate crisis, and the specific objectives of reducing pollution and road congestion through improvements to public transport, promoting walking and cycling networks and reducing the need to travel.

9.3

Support: WTBBC support the recognition in the BCP that transport strategy in the Black Country has a key role to play in reducing carbon emissions and the impact on the natural environment, and the need to focus on promoting the appropriate design, location and layout of development, increasing investment in infrastructure, improving the quality, equality and accessibility of public transport, supporting walking and cycling, enhancing road safety and reducing the amount of emissions produced by transportation.

Comment: Investment in an improved public transport network provides the opportunity to provide well-planned green and blue infrastructure integrated into the network. The value of well-planned green and blue infrastructure with regards the services it provides and in achieving the desired outcomes described in 9.2 and 9.3 should be made clear. Furthermore, it should be set out in the BCP that this will be a requirement in the planning of public transport network improvements from the earliest stages. Further detail on the requirements for green and blue infrastructure investment should be described in each of the Transport policies.

10 Environmental Transformation and Climate Change

Support: WTBBC support the broad range and detail of the Environmental Transformation and Climate Change policies in the BCP, including the addition of new policies such as ENV3, ENV4 and ENV6 which respond to emerging national legislation and evidence of the value that the natural environment provides the communities of the Black Country.

Comment: WTBBC request an additional Environmental Transformation policy is added concerning the protection, enhancement and investment in river corridors. The value that rivers provide society with regards climate change mitigation and adaptation, flooding, air quality, access and health and wellbeing is increasingly understood. The WMCA Environment Plan 2021 identifies river corridors as a priority action and recognises the value that they provide, identifying the River Stour as a focus. Whilst recognising that Policy CC5 includes appropriate actions for rivers, a strong standalone policy is required to fully maximise the opportunity that river corridors provide to deliver many of the BCP's ambitions.

Introduction

10.2

Support: WTBBC support the recognition in the BCP that the protection and improvement of the Black Country's biodiversity and geodiversity will improve the attractiveness of the area for people to live, work, study and visit while at the same time improving the physical and natural sustainability of the conurbation in the face of climate change.

10.5

Comment: Whilst acknowledging that the BCP recognises the importance of green infrastructure in achieving a healthy and stable environment, WTBBC do not feel this is reflected adequately throughout the Plan. There are numerous opportunities throughout the BCP to further reference and require consideration for and investment in the natural environment and green and blue infrastructure. This is reflected in our comments on the various sections and policies of the BCP. Furthermore, this paragraph should reference the inclusion of the Local Nature Recovery Network in Policy ENV3.

Nature Conservation - Spatial Objectives

10.8

Comment: WTBBC support the recognition in the BCP that the protection and improvement of the Black Country's biodiversity and geodiversity will safeguard and improve the environmental attractiveness and value of the area for residents and visitors while at the same time improving the physical and natural sustainability of communities within the conurbation in the face of climate change. This paragraph should, however, make more detailed and explicit reference to the broad range of valuable ecosystem services that the natural environment provides the communities of the Black Country.

Policy ENV1 – Nature Conservation

1b

Object: WTBBC object strongly to the exclusion of Sites of Local Importance for Nature Conservation (SLINCs) from this point. The National Planning Policy Framework (NPPF) does not distinguish between types of designated Local Wildlife Sites and there is therefore no planning justification for this approach being taken in the BCP. Furthermore, the NPPF states that Local Plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity.

Object: WTBBC object strongly to the exclusion of Sites of Local Importance for Nature Conservation from this point. Defra Group guidance on the production of Local Nature Recovery Maps states that Local Wildlife Sites should be included in Core Areas, and that the focus in these areas is on improving the condition of habitats, restoring natural ecosystem function and expanding the area of sites. As per this guidance all locally designated sites of importance for biodiversity have been included in the Draft Black Country Local Nature Recovery Opportunity Map commissioned by the BCA and published as Appendix 18 in the BCP.

Comment: WTBBC request that the wording 'development is not permitted where it would harm' should be changed to 'development will not be permitted where it would, alone or in combination with other plans or projects, have an adverse impact on'. This change would recognise the negative impact that nearby land-use or other changes can have on sites of high biodiversity value.

1c

Object: WTBBC object strongly to inclusion of Sites of Local Importance for Nature Conservation in this point. The National Planning Policy Framework (NPPF) does not distinguish between types of designated Local Wildlife Sites and there is therefore no planning justification for this approach being taken in the BCP. SLINCs should be excluded from this point and included in 1b where their protection is provided by the assertion that development is not permitted where it would harm designated nature conservation sites.

1d

Support: WTBBC support the that the movement of wildlife within the Black Country and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping-stone sites) is not impeded by development. This point should, however, make explicit reference to the Draft Black Country Local Nature Recovery Opportunity Map and Strategy and the ecological network as identified in this.

1e

Comment: Whilst supporting that species that are legally protected, in decline, are rare within the Black Country or that are covered by national, regional, or local Biodiversity Action Plans will be protected as far as possible when development occurs, WTBBC request that 'where possible' be removed and replaced by a statement making clear the expectation of development with regards the protection of species. This could be achieved through a commitment to reviewing relevant Supplementary Planning Documents.

2

Comment: Whilst supporting that adequate information must be submitted with planning applications for proposals that may affect any designated site or important habitat, species, or geological feature, WTBBC request that the policy clearly state that a Local Site Assessment must be undertaken and submitted to the Local Sites Partnership where development is likely to impact upon a Site of Importance for Nature Conservation, Site of Local Importance for Nature Conservation or Potential Site of Importance.

Comment: Whilst supporting that adequate information must be submitted with planning applications for proposals that may affect any designated site or important habitat, species, or geological feature, WTBBC request that this point clearly states that supporting information must include a data search from the Local Environmental Records Centre for Birmingham and the Black Country (EcoRecord).

3

Comment: WTBBC request that clarification is provided in this point as to what would comprise strategic benefits of a development that clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature. Furthermore, a clear statement that clarifies by what mechanism applications of this type will be assessed and what relevant stakeholders will be consulted should be provided.

4

Comment: WTBBC request that this point should clearly state that the Local Environmental Records Centre for Birmingham and the Black Country (EcoRecord) hold, collate and disseminate the definitive and up-to-date register of locally designated nature conservation sites on behalf of the BCA.

5

Comment: WTBBC request that an expectation that all canal and natural watercourse-side developments will deliver an improved and extended wildlife corridor for both wildlife and people be added to this point, and that this should be informed by the Black Country Local Nature Recovery Opportunity Map and Strategy as described in Policy ENV3.

6

Comment: WTBBC request that this point should clearly state that details of how improvements (appropriate to their location and scale) will contribute to the natural environment should be informed by the Black Country Local Nature Recovery Opportunity Map and Strategy as described in Policy ENV3, and that details of how this is to be achieved are provided in documents accompanying planning applications.

Justification

Comment: WTBBC request that a paragraph be added to the justification of Policy ENV1 that states the process by which Sites of Importance for Nature Conservation and Sites of Local Importance for Nature Conservation are identified and selected. This should describe the role and membership of the Local Sites Partnership, reference the Birmingham and Black Country Local Sites Selection Guidance document, and outline the process by which recommendations are received, considered and endorsed by the Local Sites Partnership. The addition of this paragraph will provide clarity and transparency for all stakeholders including LPA officers, developers and members of the public.

10.10

Support: WTBBC support the recognition of the important role the Black Country can play in helping species migrate and adapt to climate change as their existing habitats are rendered unsuitable, and that it is very important to increase the ability of landscapes and their ecosystems to adapt in response to changes in the climate by increasing the range, extent, and connectivity of habitats. Furthermore, WTBBC support reference to the emerging Black Country Local Nature Recovery Strategy, and the assertion that species dispersal will be aided whilst fragmentation and weakening of wildlife sites and wildlife corridors by development will be opposed.

10.11

Support: WTBBC support the BCA's commitment to meeting their "Biodiversity Duty" under the Natural Environment and Rural Communities Act (2006) and to delivering the principles of the NPPF by proactively protecting, restoring and creating a richer and more sustainable wildlife and geology.

10.12

Support: WTBBC support the BCA's commitment to partnerships' work to identify, map, and regularly review the priorities for protection and improvement throughout the Black Country, in accordance with the emerging Black Country Local Nature Recovery Strategy, and that this will be used to inform planning decisions.

Comment: WTBBC request that the Birmingham and Black Country Local Nature Partnership is added to the list of partnerships in paragraph 10.12.

Primary Evidence

Comment: The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Primary Evidence.

Delivery

Comment: Development and implementation of Black Country Nature Recovery Network should be changed to Development and implementation of the Black Country Local Nature Recovery Strategy.

Policy ENV2 - Development Affecting Special Areas of Conservation (SACs)

10.17

Support: WTBBC support that recognition in the BCP that development over the plan period may adversely affect Special Areas of Conservation and that a policy approach is required to address any identified potential impacts.

1c

Object: Policy ENV2 refers only to Cannock Chase SAC. Whilst recognising that reference is made in the policy justification that a specific approach may be required in the Publication BCP for Fens Pools SAC and Cannock Extension Canal SAC, WTBBC object to their exclusion from the Draft BCP Policy ENV2. These sites receive the same level of legal recognition and protection as Cannock Chase SAC and therefore the Publication version of ENV2 must provide equal avoidance and mitigation measures for these sites to any adverse impact upon them through development over the plan period.

Object: WTBBC are of the view that avoidance rather than mitigation measures to any adverse impact upon the integrity of Cannock Chase SAC should be pursued in the Black Country. This can be achieved through investment in natural landscapes within the Black Country that provide similar opportunities for leisure and contact with the natural environment to that which is provided by Cannock Chase SAC, thereby encouraging residents of the Black Country to visit these areas as an alternative to Cannock Chase.

Comment: The Draft Black Country Local Nature Recovery Strategy identifies Core Landscapes in the Walsall green belt where the restoration and expansion of heathland is a priority. Natural England have similarly identified this area as part of their Midlands Heathland Heartland initiative. Partners including WTBBC are working with Natural England on a strategy to realise a vision of a greatly expanded heathland landscape with open access. The BCP should support this initiative and provide funds through financial contributions from development likely to have an adverse impact upon the integrity of Cannock Chase SAC, and through Biodiversity Net Gain contributions (ENV3).

Justification

Comment: The Draft Black Country Local Nature Recovery Strategy identifies Core Landscapes in the Walsall green belt where the restoration and expansion of heathland is a priority. Natural England have similarly identified this area as part of their Midlands Heathland Heartland initiative. Partners including WTBBC are working with Natural England on a strategy to realise a vision of a greatly expanded heathland landscape with open access. The BCP should support this initiative and provide funds through financial contributions from development likely to have an adverse impact upon the integrity of Cannock Chase SAC, and through Biodiversity Net Gain contributions (ENV3).

Evidence

Comment: The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Primary Evidence.

Delivery

Comment: A full spatial strategy with identified funding mechanisms for the Midlands Heathland Heartland initiative in the Walsall green belt should be included in the delivery of Policy ENV2.

Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

Support: WTBBC welcome the inclusion of Policy ENV3 Nature Recovery Network and Biodiversity Net Gain, and that WTBBC were invited to provide wording for the policy during the preparation of the Draft BCP. The policy will necessarily be required to be updated for the Publication BCP in response to emerging guidance and legislation relating to Nature Recovery Network and Biodiversity Net Gain (notably the government's Environment Bill expected to receive Royal Assent in autumn 2021). WTBBC are able to provide further support to the BCA regarding Policy ENV3 during the preparation of the Publication BCP.

Policy ENV4 – Provision, retention and protection of trees, woodlands and hedgerows

Support: WTBBC support the inclusion of Policy ENV4 and the level of detail that is included in the wording of both the policy and the justification. Whilst supporting all the points in Policy ENV4, we have suggested changes and additions to a number of these, and have given explicit support to those which are of particular significance and which WTBBC consider to be innovative in the context of Local Plan policy.

10.53

Support: WTBBC support the recognition of the importance of encouraging and supporting the delivery of green infrastructure and ecological networks through urban areas, especially in relation to their role in climate change mitigation and adaptation and to mitigate the health problems associated with air pollution.

10.54

Comment: WTBBC request that the evidence used to calculate the target increase in canopy cover to at least 18% over the plan period is published in the BCP.

Support: WTBBC support the recognition of the importance of identifying the opportunities for tree planting by following the evidence provided in the Draft Black Country Local Nature Recovery Strategy. It should be added to the paragraph that that ecosystem services evidence should be produced and followed in order to maximise the benefits of tree planting for biodiversity and climate change mitigation, and also recognised that tree planting is often not ecologically appropriate.

1

Support: WTBBC support that development that would result in the loss of or damage to ancient trees, ancient woodland or veteran trees will not be permitted.

Comment: WTBBC support that development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, but request that a larger minimum depth of 25m be required, and that the policy state that only in exceptional circumstances would a buffer of less than 50m be permitted. Furthermore, it should be added that developments adjacent to ancient woodland will be required to be orientated so as to face these in order to reduce negative impacts associated with proximity to residential developments such as the introduction of non-native plant species.

4

Comment: WTBBC request that the evidence used to calculate the target increase in canopy cover to at least 18% over the plan period is published in the BCP.

8

Comment: WTBBC request the wording of this point is changed to reflect and reinforce the importance of following the evidence provided by the Draft Local Nature Recovery Strategy, recognising that tree planting is often not the most ecologically appropriate action. Furthermore, it should be stated that ecosystem services evidence should be produced and followed in order to maximise the benefits of tree planting for biodiversity and climate change mitigation by ensuring this is undertaken in the most appropriate locations.

12

Comment: WTBBC support the recognition of the value of large canopied street trees and that the planting of these should be included in all new residential developments and other significant proposals. This should go further, however, and encourage the planting of new street trees in existing residential and employment areas to maximise the wide range of health, biodiversity and climate change mitigation and adaptation benefits. The opportunity to fund the retro-fitting of street trees through Biodiversity Net Gain contributions should be explored, especially as this is expected to provide resources to manage these for a period of 30 years.

13

Comment: Whilst supporting the minimum contribution of 20% canopy cover across the development site and a recommended contribution of 30% canopy cover across the development site in new developments, this should be caveated to state that this will not be required if this would lead to damage or loss of existing habitats of value that may otherwise be retained.

16

Comment: WTBBC support that replacement trees of a suitable species must be provided on site where planning permission has been granted that involves the removal of these, and that where sufficient and suitable onsite replacements cannot be provided, off-site planting or woodland enhancement must be provided in the near vicinity of the removed tree(s). Off-site street trees of large-canopied species should be added to the options for delivering this compensation.

17

Support: WTBBC support that replacement trees located off-site should not be planted where they would impact on areas designated as ecologically important unless this has been specifically agreed with the relevant authority and its ecological officers / advisers.

24

Support: WTBBC support that there will be a presumption against the wholesale removal of hedgerows for development purposes, especially where ecological surveys have identified them to be species-rich and where they exist on previously undeveloped land.

25

Comment: WTBBC request that it is added to this point that replacement hedgerows should be of a suitable diverse mix of locally sourced native species, and that a resourced maintenance and management programme will be required that will include the replacement of plants that fail within a specified period by plants of a suitable size, species and quality.

26

Comment: Whilst supporting that the protection of hedgerows before and during development must be undertaken, WTBBC request that the policy states a minimum landscape buffer of 25m will be required, and that only in exceptional circumstances would a buffer of less than 50m be permitted.

27

Comment: Whilst supporting the creation of new hedgerows as part of site layouts and landscaping schemes, WTBBC request that it be added that these should be of a suitable diverse mix of locally sourced native species, and that a resourced maintenance and management programme will be required that will include the replacement of plants that fail within a specified period by plants of a suitable size, species and quality.

Justification

10.57

Support: WTBBC support the inclusion of this paragraph and the recognition of the value of wildlife corridors. Furthermore, the inclusion of points such as e) making sure that any new planting is in the right location and of the right species, and f) recognising that woodlands are not simple monoculture habitats and will also contain glades, wet areas, understoreys and grassland, is of particular value in the context of Policy ENV4.

10.61

Support: WTBBC support the recognition of the broad range of ecosystem services benefits that trees in the urban landscape provide.

Trees on development sites

10.67

Support: WTBBC support the inclusion of this paragraph and its aim of eliminating the practice of clearing vegetation from a site prior to the submission of a planning application.

Ancient woodland and veteran trees

10.69

Support: WTBBC support the recognition of ancient woodland and veteran trees as irreplaceable habitat.

Hedgerows

10.73

Support: WTBBC support the recognition that hedgerows are integral to ecological networks, given their linear form, and will be essential elements of habitat linkages within and beyond the Black Country. Planting additional hedgerows will help to support and increase the movement of wildlife and plants through the Black Country.

Evidence

Comment: The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Evidence.

Policy ENV 5 - Historic Character and Local Distinctiveness of the Black Country

Support: WTBBC support the inclusion of Policy ENV5, its scope and recognition of a broad range of features and characteristics which contribute to locally distinctive character, and the level of detail that is included in the wording of both the policy and the justification.

Comment: WTBBC support the inclusion of features (both natural and made-made) which contribute to local distinctive character of the Black Country's open spaces and surviving rural landscapes. WTBBC are of the view that the policy could be further strengthened by the inclusion of other habitat features beyond those currently included (e.g. hedgerows, holloways, banks, ditches, field systems, ridge and furrow, areas of open space, woodland and watercourses) to include other habitats and features of historic origin that are a valuable contributor to distinctive character. These should include heathland, permanent grassland (pastures and meadows), colliery spoil tips, furnace slag and historic quarries.

Policy ENV6 - Geodiversity and the Black Country UNESCO Global Geopark

Support: WTBBC support the inclusion of Policy ENV6, its scope and recognition of a broad range of valuable geological features. WTBBC consider Policy ENV6 to be innovative in the context of Local Plan policy.

Policy ENV7 – Canals

Support: WTBBC support the inclusion of Policy ENV7, its scope and recognition of a broad range of features and characteristics which are of value to both the built and natural environment, and the level of detail that is included in the wording of both the policy and the justification.

Comment: WTBBC request that a point is added requiring all developments to retain or create a buffer of vegetation to each side of the canal corridor where this is appropriate to the historic environment. Canal corridors are a key component of the ecological network of the Black Country as evidenced in the Draft Local Nature Recovery Opportunity Map (Appendix 18 of the BCP). New developments should therefore be expected to retain and create both aquatic and terrestrial habitats and be discouraged from hard landscaping up to the canal edge.

2c

Comment: WTBBC request that stronger policy wording is included for the retention and restoration, or where absent the construction of sensitive, boundary treatments including walls and other structures associated with the historic environment (including those constructed of furnace slag, locally quarried stone and pre-1939 bricks).

2g

Comment: Whilst supporting the reinstatement and / or upgrading of towpaths and linking them into high quality wider pedestrian and cycle networks, WTBBC request that wording is added to this paragraph that states this should not be undertaken where valuable towpath habitats are lost. For example, the narrow strips of vegetation to each side of towpaths are a characteristic feature of the Black Country canal network. These frequently support a diverse and valuable assemblage of plant species associated with both aquatic and terrestrial habitats that is not found elsewhere in the Black Country. It is important that this habitat is retained.

3d

Comment: WTBBC request that stronger policy wording is included on the layout of new developments regarding providing active frontages onto the canal, stating that only in exceptional circumstances will side and rear boundaries be allowed to face the canal.

Justification

Comment: WTBBC request that a paragraph is added to the justification of Policy ENV7 that describes the high ecological value (Priority habitats and protected species) of the Black Country's canal network and its key role in the ecological network as evidenced in the Draft Local Nature Recovery Opportunity Map (Appendix 18 of the BCP).

Evidence

Comment: The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Evidence.

Policy ENV8 – Open Space, Sport and Recreation

Support: WTBBC support the inclusion of Policy ENV8 and, whilst supporting all the Policy points, have suggested changes and additions to a number of these. Explicit support is given to those which WTBBC consider to be of particular significance in the context of the protection and enhancement of the natural environment.

10.107

Support: WTBBC support the recognition that all development proposals should recognise the values and functions of open space as set out in Government policy and guidance, and also address as appropriate various functions of open space that are of particular importance in the Black Country.

1g

Comment: WTBBC welcome the BCP's recognition of the role of open space in preserving and enhancing diversity in the natural and built environment and preventing the fragmentation of habitat networks. WTBBC are of the view, however, that the policy would be stronger if the built and natural environment are included as separate points.

1h

Comment: WTBBC support strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network. This point links with Policy CSP4 point 6: the pursuance of an integrated and well-connected multifunctional open space network. WTBBC are of the view that to fully realise many of the BCP's aspirations that mapping of the existing multifunctional green space and greenway network should be undertaken in parallel with the Local Nature Recovery Strategy. This will enable targeted investment in the network which maximises biodiversity, social and a range of other ecosystem services benefits.

3b

Support: WTBBC support that each local authority will set out proposals for specific open spaces that address the priorities set out in the Draft Black Country Local Nature Recovery Strategy.

3cii

Support: WTBBC support protecting the existing greenway network for recreation and biodiversity and taking opportunities to strengthen and expand the network. WTBBC are of the view that to fully realise many of the BCP's aspirations that mapping of the existing multifunctional green space and greenway network should be undertaken in parallel with the Local Nature Recovery Strategy. This will enable targeted investment in the network which maximises biodiversity, social and a range of other ecosystem services benefits.

Justification

10.155

Comment: WTBBC support the recognition of the value of greenways in the BCP and the acknowledgment of the need to invest in and improve the network. WTBBC are of the view that there is clear link between the network of greenways and the Local Nature Recovery Network, and that the opportunity to invest will benefit the aspirations of both. WTBBC therefore request that this link is referenced in this paragraph. Furthermore, the opportunity to further increase both the extent and quality of greenways along the Black Country's network of rivers and streams should be made more strongly.

Evidence

Comment: The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Evidence.

Policy ENV9 – Design Quality

Support: WTBBC support the inclusion of Policy ENV9, the recognition of the link between high-quality design and climate change, and the need to ensure development has no harmful impacts on key environmental assets (Policies ENV1 and ENV3).

5

Comment: WTBBC support the recognition of the opportunities that major developments provide in contributing to the greening of the Black Country, and the specific references in points 5a, 5b and 5c to green infrastructure opportunities. WTBBC are of the view, however, that these opportunities can be realised in most developments at any scale, and therefore request that this should not apply only to major developments.

Policy CC5 – Flood Risk

12

Support: WTBBC support that developments should, where possible, naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements.

15

Comment: Whilst WTBBC support that there should be no built development within five metres of an ordinary watercourse and ten metres of the top of the bank of a main river, these buffers should be given as minimums allowed only in exceptional circumstances. Developers should be expected to provide buffers which protect and, where relevant, increase the extent of the natural environment adjoining the watercourse. Furthermore, whilst WTBBC support the enabling of the preservation of the watercourse corridor, public access and new and improved greenways should also be given as a desired outcome, with links to policies CSP4 and ENV8 made.

Policy CC6 - Sustainable drainage and surface water management (SuDS)

1

Support: WTBBC support that all new developments should incorporate SuDS and all development proposals should provide details of adoption, ongoing maintenance, and management of SuDS.

2

Comment: Whilst WTBBC support that preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area, a clear link to Policy ENV3 and the delivery of the Draft Black Country Local Nature Recovery Strategy should be made.

Evidence

Comment: The Draft Local Nature Recovery Opportunity Map and components description (published as Appendix 18 in the BCP) should be added to the list of Evidence.

12 Minerals

Policy MIN3 - Preferred Areas for New Mineral Development

8

Comment: Whilst supporting that due to the constraints of the Brownhills Common site, mineral working is not expected to take place during the plan period, we request that constraints including the site's nature conservation designation and amenity value are outlined in this point.

9

Support: WTBBC support significant weight being given to proposals that would allow for the revocation of the existing 'dormant' permission at Brownhills Common.

Policy MIN4 - Managing the Effects of Mineral Development

6

Comment: WTBBC are of the view that this point should more strongly support minerals sites restoration plans which deliver significant environmental and social benefits. Existing and proposed mineral extraction sites are located within the Walsall green belt. The Draft Black Country Local Nature Recovery Strategy identifies Core Landscapes in the Walsall green belt where the restoration and expansion of heathland is a priority. Natural England have similarly identified this area as part of their Midlands Heathland Heartland initiative. Policy MIN4 should therefore require mineral sites restoration plans to provide the creation of suitable heathland habitats as identified in the Draft LNRS.

13 Sub-Areas and Site Allocations

Comment: WTBBC welcome the BCA's use of the Site Assessment (selection) process and the evidence that has been collated for and used in this. Many sites put forward through the Call for Sites process where development would have been highly damaging for wildlife, landscape and communities have not been selected as a result of the implementation of this (notable examples are Seven Cornfields in Wolverhampton, the Dudley green belt to the south of Halesowen and numerous sites in the Walsall green belt). A number of sites have, however, been selected where evidence demonstrates they should not, or where significant considerations remain.

Comment: Due to the large number of allocations in the BCP it was necessary to develop a process to determine which sites WTBBC were able to submit evidence-based comments for. Our detailed response to the BCP's policies provides information on how the remaining allocations should be managed through the planning system.

In summary, we have commented on or objected to sites:

- That the Site Assessment process should not have selected.
- Designated for nature conservation or adjoining these.
- Where a Local Sites Assessment should have been undertaken but has not.
- Of high value for ecological connectivity.
- Understood to be public open space.

Comment: WTBBC understands that any written submission will be transferred by the Black Country Authorities to their digital consultation database which has a 100 word limit per response. Each of our allocation responses has therefore been limited to 100 words. Additional details on our comments, evidence and analysis can be provided subsequent to the consultation deadline upon request. Furthermore, WTBBC are able to provide information regarding the specific development considerations of Strategic Allocations.

For each response given we have preceded this with either Support, Object or Comment as requested in the How to Comment section of the Black Country Plan website.

A. Dudley

Table 14 - Dudley Housing Allocations in the Black Country Plan (BCP Policy HOU1)			
BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
DUH006	Caledonia Sewage Works, Lye	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site is part SLINC, part PSI and adjoins a SINC. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for Priority habitats and species. • Opportunity exists to retain significant buffer to River Stour, create high-quality accessible natural greenspace and undertake in-channel river enhancements. • Opportunity to invest in greenway access to river corridor. • Site is within an Area of High Historic Landscape Value.
DUH007	Clinic Drive, Lye	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation contains an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. The area of public open space should therefore be retained within the development. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH009	Land off Delph Lane, Brierley Hill	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site comprises a significant area of semi-natural habitat. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

DUH010	Land off Ruiton Street / Colwall Road, Lower Gornal	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site includes a significant area of semi-natural habitat. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation. • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation.
DUH011	Bourne Street, Coseley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis.
DUH020	Lyde Green / Cradley Road, Cradley	Comment	<p>WTBBC request that significant enhancements are required of the site redevelopment:</p> <ul style="list-style-type: none"> • The site lies adjacent to a key river corridor (River Stour) and the opportunity exists to create a substantial green buffer and high-quality natural greenspace with riverside access for both new and existing local residents. • Redevelopment of the riverside provides opportunity to deliver in-channel river enhancements and bank regrading/naturalisation. • Opportunity to invest in greenway access to river corridor.
DUH022	Land off Thorns Road, Lye (North)	Comment	<p>WTBBC request that significant enhancements are required of the site redevelopment:</p> <ul style="list-style-type: none"> • The site lies adjacent to Meers Coppice ancient semi-natural woodland, a habitat type that is vulnerable to damage from inappropriate adjacent landuse. Redevelopment provides the opportunity to create a minimum 50m buffer of appropriate habitat (as defined in the Draft Black Country Local Nature Recovery Strategy) as part of the provision of high-quality accessible natural greenspace.
DUH038	Land between Heath Road and Copse Road, Netherton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation.

			<ul style="list-style-type: none"> The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH039	Land rear of Salcombe Grove, Coseley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH041	Land rear of Two Gates Lane, Cradley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH045	Former factory site, Park Lane, Cradley	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
DUH049	Former Mons Hill Campus (Dudley College), Wrens Hill Road, Dudley	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> The site adjoins Wrens Nest National Nature Reserve and Site of Special Scientific Interest. Redevelopment provides the opportunity to create a minimum 50m buffer of appropriate habitat (as defined in the Draft Black Country Local Nature Recovery Strategy) as part of the provision of high-quality accessible natural greenspace.
DUH052	Land rear of 294 - 364	Comment	<p>WTBBC request that significant enhancements are required of the site redevelopment:</p> <ul style="list-style-type: none"> The site adjoins a Site of Local Importance for Nature Conservation (SLINC). Development of the

	Stourbridge Road, Halesowen		allocated site provides the opportunity to create a buffer of appropriate habitat (as defined in the Draft Black Country Local Nature Recovery Strategy) as part of the provision of high-quality accessible natural greenspace.
DUH059	Former New Hawne Colliery, Haysech Road, Halesowen	Comment	<p>WTBBC request that significant enhancements are required of the site redevelopment:</p> <ul style="list-style-type: none"> • The site adjoins a Site of Importance for Nature Conservation (SINC). Development of the allocated site provides the opportunity to create a buffer of appropriate habitat (as defined in the Draft Black Country Local Nature Recovery Strategy) as part of the provision of high-quality accessible natural greenspace. • It is WTBBC's view that the site is suitable for the preservation, restoration and repurposing of the historic industrial buildings associated with Hawne Colliery to residential use. • Site is within an Area of High Historic Landscape Value and an Archaeological Priority Area.
DUH203	Ketley Quarry / Ketley Farm, Dudley Road, Kingswinford	Comment	<p>WTBBC request that significant enhancements are required of the site redevelopment:</p> <ul style="list-style-type: none"> • The site contains a designated Site of Special Scientific Interest, Site of Importance for Nature Conservation and a Site of Local Importance for Nature Conservation, all of which have been lost to mineral extraction. The site has now been levelled. • It is WTBBC's position that substantial ecological compensation for this loss should be required of the site development.
DUH206	Worcester Lane North, Stourbridge	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.</p> <p>Features within the site should be retained:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
DUH207	Worcester Lane Central, Stourbridge	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.</p> <p>Features within the site should be retained:</p>

			<ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
DUH208	Land south of Holbeache Lane / Wolverhampton, Kingswinford	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.</p> <p>Features within the site should be retained:</p> <ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
DUH209	Worcester Lane South, Stourbridge	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.</p> <p>Features within the site should be retained:</p> <ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
DUH210	Viewfield Crescent, Dudley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> The site is a Site of Local Importance for Nature Conservation (SLINC). Adjoins a Local Nature Reserve and therefore high potential for detrimental impact. Ecological Evaluation of BC Green Belt found site to be of Very High ecological value. High potential for Priority habitats and species on site. Green Belt Assessment found development would be of Moderate to High harm.

			<ul style="list-style-type: none"> • Site Assessment states previously developed land but no evidence of this on OS mapping from 1886 to present day. • Within an Area of High Historic Landscape Value.
DUH211	Land at Swindon Road, Wall Heath, Kingswinford (The Triangle Site)	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.</p> <p>Features within the site should be retained:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
DUH212	Lewis Rd, Lye	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH213	Lapwood Avenue, Kingswinford	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH215	Bent Street, Brierly Hill	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation.

			<ul style="list-style-type: none"> The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH216	Bryce Road, Pensnett	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
DUH217	Grazing Land Wollaston Farm, Wollaston, Stourbridge	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.
DUH218	Lower Guys Lane, Lower Gornal	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis.
DUH221	Standhills Road, Kingswinford South	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The SLINC and a suitable buffer between this and the development area should be retained, thereby providing an area of high quality accessible natural greenspace.

DUH222	Corbyns Hall Open Space	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
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Table 16 - Dudley Employment Allocations in Black Country Plan (BCP Policy EMP1)

BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
DUE123	Dandy Bank Road Phases 2 and 3, Pensnett	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Retain the areas of semi-natural habitat (PSI) in line with draft Local Nature Recovery Map.
DUE327	Tansey Green Road, Pensnett	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy.
DUE320	Dreadnought Road, Pensnett	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern).

			<ul style="list-style-type: none"> • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy.
DUE132	Hulbert Drive, Blackbrook Valley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of the presence of priority habitats and species (Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy. • Ecological Evaluation found site to be of Very High ecological value.
DUE136	Narrowboat Way, Blackbrook Valley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy. • Ecological Evaluation found site to be of Very High ecological value.
DUE187	Steelpark Road, Halesowen	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy. • Ecological Evaluation found site to be of Very High ecological value.
DUE321	Bean Road, Coseley	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Retain the areas of semi-natural habitat (PSI) in line with Draft Local Nature Recovery Strategy.

			<ul style="list-style-type: none"> • Site adjacent to canal SLINC and forms part of important and well connected area in Draft Local Nature Recovery Strategy. • Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent canal SLINC/corridor and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
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Local Green Space Designations

Policy DSA4 Corbett Meadow Local Green Space

Policy	Site name & address	BCP Site Ref	Support Comment Object	Justification/comments
DSA4	Corbett Meadow Local Green Space	n/a	Support	<p>WTBBC support the designation of Corbett Meadow as Local Green Space:</p> <ul style="list-style-type: none"> • The site clearly meets the criteria of beauty, historical significance, tranquillity and wildlife. • The site has not been surveyed or assessed against the Birmingham and Black Country Local (wildlife) Site criteria since 1992. Since this time the criteria have been reviewed in response to Defra guidance (2006). The site should be resurveyed and assessed following the current Birmingham and Black Country Local Sites Assessment Guidance. • It is WTBBC's view that efforts should be made to enable access to Corbett Meadows, this would provide significant benefits to local residents.

B. Sandwell

Table 22 - Sandwell Residential Site Allocations (BCP Policy HOU1)			
BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
SAH068	Hawes Lane, Rowley Regis	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. Objection on this basis.
SAH069	Beever Road, Great Bridge	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. Objection on this basis.
SAH070	Land at Horseley Heath, Alexandra Road and Lower Church Lane, Tipton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis. • A recent Local (wildlife) Site Assessment (LSA) recorded that the northern part of the SLINC had been lost to development. WTBBC are not aware of any LSA having been undertaken to inform the planning decision.

SAH083	Swan Lane Former Gas Works	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
SAH086	Former Sunlight Laundry, Stanhope Rd, Smethwick	Comment	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
SAH088	Rattlechain Site, Land to the north of Temple Way, Tividale, Oldbury	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. The remainder of the site has been identified as Potential Site of Importance (for nature conservation). A completed Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. WTBBC object to the allocation on this basis.
SAH091	Land at Friar Park Road, Wednesbury	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. Much of the remainder of the site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process.

			<ul style="list-style-type: none"> • WTBBC object to the allocation on this basis.
SAH098	Temple Way (Rattlechain), Tividale, Oldbury	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
SAH100	Edwin Richards Quarry, Portway Road, Rowley Regis	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. • Much of the remainder of the site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. • WTBBC object to the allocation on this basis.
SAH103	The Phoenix Collegiate, Friar Park Road, Wednesbury	Comment	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. • Part of the remainder of the site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. <p>WTBBC object to the allocation on this basis.</p>
SAH224	Land off Tanhouse Avenue, Great Barr	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site is a Site of Local Importance for Nature Conservation (SLINC).

			<ul style="list-style-type: none"> • Adjoins a Local Nature Reserve and Site of Importance for Nature Conservation, therefore high potential for detrimental impact. • Ecological Evaluation of BC Green Belt found site to be of Very High ecological value. • High potential for Priority species on site. • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • Development would have significant negative impact on amenity and aesthetic value of RSPB Sandwell Valley.
SAH226	Land to north of Painswick Close Sub Station	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). Site forms part of an important ecological corridor linking Sandwell Valley to the Walsall green belt.
SAH228	Brandhall Golf Course	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • WTBBC understand the allocation is an area of <i>de facto</i> public open space. It is WTBBC's position that due to the densely urban local landscape and the broad range of benefits that public open space provides, the formalisation of this use should be pursued.

Table 24 - Sandwell Employment Development Allocations

BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
SAE246	Whitehall Road, Tipton	Comment	<p>WTBBC request that the following is required of the site redevelopment:</p> <ul style="list-style-type: none"> • Site adjacent to a canal: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent canal corridor (please also refer to WTBBC comment under policy ENV7) and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
SAE176	Coneygree, Newcomen Drive, Tipton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy.
SAE200	Land adjacent to Asda, Wolverhampton Road, Oldbury	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site is adjacent to River Tame and forms part of the wider Tame Valley Wildlife Corridor. Development of this site would significantly narrow the corridor at this point. • High potential for/evidence of presence of priority habitats and species. • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy.
SAE158	Severn Trent land off Roway Lane, Oldbury	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

			<ul style="list-style-type: none"> • High potential for/evidence of the presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy.
SAE253	Rounds Green Road / Shidas Lane, Oldbury	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy.
SAE256	Site off Bilport Lane, Wednesbury	Comment	<p>It is WTBBC's position that the following needs to be considered:</p> <ul style="list-style-type: none"> • Site, including stream banks, should be subject to a Local (wildlife) Site Assessment. • Opportunity exists to retain significant buffer to River Tame, create high-quality accessible natural greenspace and undertake in-channel river enhancements. • High potential for/evidence of the presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL)). • Site forms part of important and well connected area in Draft Local Nature Recovery Strategy with evidence of the presence of statutory protected species.

C. Walsall

Table 31 - Walsall Sites Allocated for Housing by Black Country Plan (policy HOU1)			
BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
WAH230	Land on the east side of Chester Road, Aldridge	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • The site is a Site of Local Importance for Nature Conservation (SLINC). • Provides an important ecological stepping-stone between Walsall green belt and Sutton Park NNR. • Site provides opportunity to create heathland habitats as prioritised in the Draft BC LNRS. • Site provides the opportunity to create new area of public open space for nearby developments which will require provision. • Green Belt Assessment found development would be of Moderate to High harm.
WAH231	Land off Sutton Road, Longwood Lane, Walsall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • The site is a Site of Local Importance for Nature Conservation (SLINC). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). • Ecological Evaluation of BC Green Belt found site to be of Very High Ecological Value. • Green Belt Assessment found development would be of High harm. • Area of High Historic Landscape Value.
WAH232	Yieldsfield Farm (sometimes recorded as	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p>

	Yieldfields farm), Stafford Road, Bloxwich		<ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • The site contains a Site of Local Importance for Nature Conservation (SLINC). • Site is close to Cannock Extension Canal SAC and Pelsall North Common LNR, therefore high potential for detrimental impact. • Site provides opportunity for heathland creation and therefore increased ecological connectivity. • Ecological Evaluation of BC Green Belt found site to be of Very High Ecological Value. • Green Belt Assessment found development would be of Very High harm.
WAH233	Middlemore Lane West, Aldridge	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Site is bounded by defunct hedgerow with mature trees which should be retained/restored. • Site adjoins Daw End Railway Cutting SSSI therefore buffer of appropriate habitat should be retained/created. • Daw End Railway Cutting SSSI known to be important site for bats and therefore lighting strategy required. • Ecological Evaluation of BC Green Belt found site to be of High Ecological Value. • Green Belt Assessment found development would be of Moderate to High harm.
WAH234	Land between Queslett Road, Doe Bank Lane and Aldridge Road, Pheasey	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Site provides an important ecological stepping-stone between Walsall green belt and Sutton Park NNR. • Area known to be important migration route for bats and therefore lighting strategy required. • Site provides opportunity to retain significant open space and create heathland habitats as identified in the Draft BC Local Nature Recovery Strategy. • Green Belt Assessment found development would be of Very High harm.
WAH235	Home Farm, Sandhills, Walsall Wood	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. It is WTBBC's position that features within the site should be retained:</p>

			<ul style="list-style-type: none"> • Site includes an area of Site of Local Importance for Nature Conservation (SLINC). It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace. • Site provides opportunity to retain significant open space and create heathland habitats as identified in the Draft BC Local Nature Recovery Strategy.
WAH236	Land at Yorks Bridge, Lichfield Road, Pelsall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • The site contains a Site of Local Importance for Nature Conservation (SLINC). • Site is close to Cannock Extension Canal SAC and adjoins Pelsall North Common LNR, therefore very high potential for detrimental impact. • Site provides opportunity for heathland creation and therefore increased ecological connectivity. • Ecological Evaluation of BC Green Belt found site to be of Very High Ecological Value. • Green Belt Assessment found development would be of Moderate High harm.
WAH237	Land north of Stonnall Road, Aldridge	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Site provides opportunity to retain significant open space and create heathland habitats as identified in the Draft BC Local Nature Recovery Strategy.
WAH238	Land at Vicarage Road / Coronation Road, High Heath	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Site includes an area of Site of Local Importance for Nature Conservation (SLINC). It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained. • The western portion of the site forms part of an important ecological corridor which links a number of areas of the Walsall green belt. This area should therefore be excluded from any development.
WAH239	Land north of Northfields Way, Clayhanger, Brownhills	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.

			<ul style="list-style-type: none"> • Site was previously cleared of vegetation which prevented an objective Local (wildlife) Site Assessment being undertaken (this conflicts with Policy ENV4 10.67). • Site forms an important ecological corridor which links Clayhanger SSSI to Clayhanger Common SINC and SLINC. • Site adjoins canal and therefore high potential for detrimental impact to canal corridor.
WAH240	Land at Mob Lane, High Heath, Pelsall	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. Features within the site should be retained:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.
WAH241	Former NHS site, land east of Nether Hall Avenue, Great Barr	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained.
WAH242	Calderfields West, Aldridge Road, Walsall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). Site forms part of an important ecological corridor linking areas of the Walsall green belt.

WAH243	Cartbridge Lane South Open Space	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Ecological Evaluation of BC Green Belt found site to be of Very High Ecological Value. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy).
WAH244	Former Reedswood Golf Course	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • The site comprises a substantial area of semi-natural habitat. • Ecological Evaluation of BC Green Belt found site to be of High Ecological Value. • Site provides opportunity to create high-quality accessible natural greenspace for adjoining residential development site (WAH152). • High ecological connectivity value.
WAH245	Former Allens Centre and Hilton Road amenity greenspace	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • WTBBC understand the allocation contains an area of public open space. The area of public open space should therefore be retained within any development.
WAH246	Land to the east of Chester Road, north of Pacific Nurseries Hardwick	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance

			<p>for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.</p> <ul style="list-style-type: none"> • Opportunity to create heathland habitats as identified in Draft LNRS.
WAH248	Land to the northeast of Shire Oak, Lichfield Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • Ecological Evaluation of BC Green Belt found site to be of Very High Ecological Value. • Site should be retained and invested in to provide high-quality accessible natural greenspace for nearby developments. • Green Belt Assessment found development would be of High harm.
WAH249	Land to the southwest of Shire Oak, Lichfield Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. • Ecological Evaluation of BC Green Belt found site to be of Very High Ecological Value. • Site should be retained and invested in to provide high-quality accessible natural greenspace for nearby developments. • Green Belt Assessment found development would be of High harm.
WAH251	212 Barns Farm, Barns Lane	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). Site forms part of an important ecological corridor linking areas of the Walsall green belt.
WAH252	The Three Crowns, Sutton Road	Comment	<p>WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt. WTBBC request that significant enhancements are required of the site redevelopment:</p> <ul style="list-style-type: none"> • The site adjoins a Site of Importance for Nature Conservation (SINC). Development of the allocated site provides the opportunity to create a buffer of appropriate habitat (as defined in the Draft Black

			Country Local Nature Recovery Strategy) as part of the provision of high-quality accessible natural greenspace.
WAH253	South of Stonnall Road	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • Site contains a substantial area of semi-natural habitat. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAH254	Pacific Nurseries, Chester Road, Walsall	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • Site contains a substantial area of semi-natural habitat. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAH256	Land to the rear of 114-130 Green Lane, Shelfield	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site situated close to Site of Special Scientific Interest and therefore high potential for detrimental impact.

Table 32 - Walsall Sites Allocated for Housing 'Carried Forward' from Site Allocation Document

BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
WAH108	Kendrick Place and Castle View Road, Moxley	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • Site contains area of semi-natural habitat. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

WAH118	Poplar Avenue (east), Bentley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis. • WTBBC understand the allocation is an area of public open space. Due to the broad range of benefits that these sites provide local communities no public open space should be allocated for development. On this basis we object.
WAH119	Noose Crescent (former Lakeside School), Willenhall	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • The site adjoins Wadden's Brook Local Nature Reserve. Redevelopment provides the opportunity to create a suitable buffer of appropriate habitat (as defined in the Draft Black Country Local Nature Recovery Strategy) as part of the provision of high-quality accessible natural greenspace.
WAH128	Festival Avenue (end of street), Darlaston	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
WAH129	Festival Avenue, Darlaston	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object to the allocation. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
WAH151	Land at Churchill Road and Kent Road, to the rear of 2-14 Kent Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site contains a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework states that Local Plans should safeguard components of local wildlife-rich habitats

	and 201-205 Churchill Road, Bentley, Walsall		<p>and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis.</p> <ul style="list-style-type: none"> • WTBBC understand the allocation is an area of public open space. Due to the broad range of benefits that these sites provide local communities no public open space should be allocated for development. On this basis we object.
WAH161	Cricket Close Allotments and Tennis Courts, Walsall	Comment	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAH172	Rowley View, Moxley (former nursery and open space)	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • WTBBC understand the allocation contains an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. The area of public open space should therefore be retained within the development. • The retention of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments, securing improved accessible natural greenspace for the local community along with the resources for ongoing maintenance and monitoring.
WAH174	Gorway Road	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained, thereby providing an area of high quality accessible natural greenspace.

Table 36 - Walsall Sites Allocated for Employment by Black Country Plan (policy EMP1)

BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
WAE409	237 Watling Street, Brownhills	Comment	<p>It is WTBBC's position that the following needs to be given consideration:</p> <ul style="list-style-type: none"> • Site adjacent to a canal SLINC: Include measures to ensure any development doesn't have both short and long term detrimental effects on the adjacent canal corridor (please also refer to WTBBC comment under policy ENV7) and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network/LLNRS priorities as identified in Draft BC LNRS opportunities map. • Implement recommendations from Local Site Assessment carried out in 2019 • Site is within the Green Belt: WTBBC strongly encourages that alternatives are sought and any other options explored in order to prevent areas of the Green Belt being lost even where those areas may have not fully met the ecological value threshold for objection.
WAE404	Lynx / Beatwaste Site, Bentley Lane	Object	<p>It is WTBBC's position that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site forms part of important and well connected area in draft Local Nature Recovery Map. It is next to an LNR and directly adjoins a SLINC. Development of this site could have a significant detrimental effect not only on both the existing designated areas but the connectivity of the wider LNRS. • High potential for/evidence of presence of important/priority habitats and species (namely farmland birds). • Site is within Green Belt: WTBBC strongly encourages that alternatives are sought and any other options explored in order to prevent areas of the Green Belt being lost.
WAE410	Johnsons Farm and Meadow Farm	Comment	<p>It is WTBBC's position that the following needs to be given consideration:</p> <ul style="list-style-type: none"> • Retain any areas of semi-natural habitat. A Local (wildlife) Site Assessment should be carried out to identify these areas and any opportunities for enhancement in line with the draft BC LNRS priorities/opportunities map.

			<ul style="list-style-type: none"> • Site is within the Green Belt: WTBBC strongly encourages that alternatives are sought and any other options explored in order to prevent areas of the Green Belt being lost even where those areas may have not fully met the ecological value threshold for objection.
WAE411	Land to the south east of Longwood Bridge	Object	<p>It is WTBBC's position that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site forms part of important and well connected area in draft Local Nature Recovery Map and development of the site could have a significant detrimental impact on that connectivity. • Site is also adjacent to a Canal SLINC (please refer to WTBBC comment under policy ENV7).
WAE412	Sandown Quarry, Stubbers Green Road, Aldridge	Object	<p>It is WTBBC's position that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Part of this site is designated a Site of Special Scientific Interest (Swan Pool and The Swag SSSI). • The remainder are of this site is identified as PSI. A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site is identified as Core Habitat zone in draft BC LLNRS map and forms part of important and well connected area (to the North and East) in draft Local Nature Recovery Map. Development of the site could have a significant detrimental impact in the LNRS. • Site is also adjacent to a Canal SLINC (please refer to WTBBC comment under policy ENV7). • High potential for/evidence of the presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL)).

Table 37 - Walsall Sites Allocated for Employment 'Carried Forward' from Site Allocation Document

BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
WAE002	Pelsall Road / Bullows Road, Brownhills	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> • Site hedgerows and trees/woodlands should be retained. • Site in close proximity to Clayhanger SSSI. Opportunity exists to create a substantial green buffer.
WAE005	North of Maybrook / Clayhanger Road, Brownhills	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> • Site originally mapped as PSI though cleared since (c2019). Remaining pond feature adjacent to canal should be retained and canal corridor habitat enhancements delivered in line with Draft Local Nature Recovery Strategy.
WAE004	Former scrapyard, north of Joberns Tip, Coppice Lane, Walsall Wood	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • LNRS core habitat area/High Ecological evaluation score, with high potential for/evidence of presence of important/priority habitats.
WAE010	Adjacent Shaylors, Anchor Industrial Park, Wharf Approach, Aldridge	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • LNRS core habitat area. Site forms part of the Anchor Brook Valley.
WAE012	Former Aldridge Rail Sidings, Middlemore Lane, Aldridge	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> • Site is part SLINC (last surveyed in 2001). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site forms part of the LNRS core habitat area and contains UK Priority Habitat Lowland dry acid grassland. Development would also have a detrimental impact of ecological connectivity.

WAE014	Former Jack Allen Site, South of Middlemore Lane, Aldridge	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> Site adjacent to SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE021	McKechnie Brass, Middlemore Lane, Aldridge	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE017	Focus 10 (adjacent former Trident Alloys), Willenhall Lane, Bloxwich	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE024	Rear of Biasi House, opposite Mary Elliot School, Leamore Lane	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE041	North of Newfield Close, Walsall	Comment	It is WTBBC's position that features within the site should be retained/enhanced: <ul style="list-style-type: none"> Site adjacent to railway PSI: Include measures to ensure the development doesn't have both short and long term detrimental effects on potentially important habitats on site (patches of Gorse appear to be present) and the adjacent railway corridor. As a result, a Local (wildlife) Site Assessment should be carried out. Furthermore, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE052	Walsall Enterprise Park West, Regal Drive, Pleck	Comment	It is WTBBC's position that features within the site should be enhanced:

			<ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE058	Reedwood Way	Comment	<p>It is WTBBC's position that features within the site should be retained/enhanced:</p> <ul style="list-style-type: none"> Site originally identified as Potential Site of Importance (for nature conservation) but subsequently cleared/partially developed: Include measures to ensure the development doesn't have both short and long term detrimental effects on remaining potentially important habitats, namely adjoining pool PSI.
WAE063	Tempus 10 North (land east of KFC, Tempus Drive)	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as a Potential Site of Importance (for nature conservation) and adjacent to a SLINC stream corridor where there is evidence of protected species being present (Water Vole). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE068	Land between St. Annes Road, Monmer Lane and Sharesacre Street, Willenhall	Comment	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Part of site (Former Bentley Canal) has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. It is WTBBC's position that features associated with the Former Bentley Canal should be retained/enhanced.
WAE065	Adjacent Rainbow Business Park, Stringes Lane, Willenhall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as a Potential Site of Importance (for nature conservation) (former Midland Railway PSI). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. Development would also negatively impact connectivity.
WAE069	Former Ductile, Charles Street, Willenhall	Comment	<p>It is WTBBC's position that features within the site should be enhanced:</p>

			<ul style="list-style-type: none"> • Opportunity to retain and enhance/buffer canal and railway corridor thus contributing to the Local Nature Recovery Network.
WAE071	North of Watery Lane, Willenhall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site is a Site of Importance for Nature Conservation (SINC), a Gateway Constraint in the BCP Site Assessment process. WTBBC strongly object to the allocation on this basis. • The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. • High potential for/evidence of presence of priority habitats/ species.
WAE072	Rear of Assa Abloy, School Street, Willenhall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as a Potential Site of Importance (for nature conservation) and forms part of the River Tame Valley. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE078	North of Westacre, Willenhall	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as a Potential Site of Importance (for nature conservation) and forms part of the River Tame Valley. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE084	Central Point, Willenhall Road, Darlaston	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Open Mosaic habitat has developed since site cleared in c. 2000, adjoining canal SLINC.
WAE093	Access 10 Business Park, land adjacent Unit 401, Bentley Road South	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as a Potential Site of Importance (for nature conservation) and forms part of the River Tame Valley. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

WAE103	Former IMI south of canal, Darlaston Road, Pleck (Phoenix 10 Site A - Part)	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC (and PSI area) and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE104	Former IMI Works, Pleck (Phoenix 10 Site A - part)	Comment	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC (and PSI area) and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE106	North of IMI, Pleck (Phoenix 10 Site B)	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> Site has been identified as a Potential Site of Importance (for nature conservation) with important/priority habitats present and evidence of protected species. A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE105	Rear of Globe Pub, Darlaston Road, Walsall	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis. LNRS core habitat zone with high potential for/evidence of presence of priority habitats/ species. Forms part of the River Tame Valley.
WAE109	Box Pool Site, Darlaston Road, Walsall	Object	WTBBC have concluded that the Site Assessment process should not have selected site: <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE110	James Bridge Gasholders Site, Darlaston Road, Walsall	Object	It is WTBBC's position that features within the site should be retained: <ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National

			<p>Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. It is therefore WTBBC's position that the SLINC and a suitable buffer between this and the development area be retained</p> <ul style="list-style-type: none"> • A Local (wildlife) Site Assessment is required in the remainder of the site to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Opportunity exists to retain significant buffer to River Tame, create high-quality accessible natural greenspace and undertake in-channel river enhancements.
WAE122	Former Moxley Tip, Moxley Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation) and is adjacent to a SINC and SLINC. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • LNRS core habitat zone with high potential for/evidence of presence of priority habitats (post-Industrial) and species.
WAE205	Bentley Mill Way East (Phoenix 10 Site C)	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation) containing Sneyd Brook and River Tame Valleys and adjacent to a canal SLINC. Evidence of protected species being present (Water Vole). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE315	Casino and Cinema, Bentley Mill Way	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Site adjacent to Sneyd Brook Potential Site of Importance (for nature conservation): Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE317	Millers Close, Bentley Mill Way	Comment	<p>It is WTBBC's position that features within the site should be retained:</p>

			<ul style="list-style-type: none"> Site adjacent to River Tame Potential Site of Importance (for nature conservation): Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE328	Leamore Lane (south side - former Dealeys Castings)	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> Site adjacent to canal SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WAE333	Willenhall Sewage Works	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard locally designated sites of importance for biodiversity. The SLINC and a suitable buffer should be retained. Remainder of site identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WAE341	Hughes Road, Moxley	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. LNRS core habitat zone with high potential for/evidence of presence of priority/important (post-Industrial) habitats and species.

D. Wolverhampton

Table 43 - Wolverhampton Housing Allocations in Black Country Plan			
BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
WOH185	Alexander Metals Open Space	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • WTBBC understand the allocation is an area of public open space. Due to the broad range of benefits that these sites provide local communities no public open space should be allocated for development. On this basis we object.
WOH186	East of Qualcast Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • The site comprises a substantial area of semi-natural habitat. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken. • WTBBC are of the view that the area should be retained and invested in to provide high-quality accessible natural greenspace for nearby developments. The creation of public open space provides the opportunity to invest biodiversity net gain payments from nearby developments.
WOH198	Beckminster House, Beckminster Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site contains significant landscape and built environment features which should be retained.

WOH257	Northycote Lane, Bushbury, Wolverhampton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site contains a Site of Local Importance for Nature Conservation (SLINC). • Site hedgerows and lanes/greenways are of high ecological and historic landscape value. • Adjoins SINC and probable ancient semi-natural woodland and therefore high potential for detrimental impact. • Ecological Evaluation of BC Green Belt found site to be of High ecological value. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). • Green Belt Assessment found development would be of Very High harm. • Adjoins Area of High Historic Landscape Value and Designed Landscape of High Historic Value.
WOH258	South of Moseley Road, Bushbury, Wolverhampton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site contains a Site of Local Importance for Nature Conservation (SLINC). • Hedgerows and Moseley Road are of high ecological and historic landscape value. • Adjoins SINC and probable ancient semi-natural woodland and therefore high potential for detrimental impact. • Ecological Evaluation of BC Green Belt found site to be of High ecological value. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). • Green Belt Assessment found development would be of Very High harm. • Adjoins Area of High Historic Landscape Value and Area of High Historic Townscape Value.
WOH259	North of Moseley Road, Bushbury, Wolverhampton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site contains a Site of Local Importance for Nature Conservation (SLINC). • Hedgerows and Moseley Road are of high ecological and historic landscape value. • High ecological connectivity value (Draft BC Local Nature Recovery Strategy). • Green Belt Assessment found development would be of Very High harm.

WOH261	Oxley Park Golf Club land adjacent to 139 Oxley Moor Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis.
WOH263	Land North of Grassy Lane, Fallings Park, Wolverhampton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WOH267	South Staffordshire Golf Course Land at Codsall Road, Wolverhampton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. Site is of high visual amenity value.
WOH269	Oxley Park Golf Club land adjacent to 21 Oxley Links Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis.
WOH270	Oxley Park Golf Club land adjacent to 10 Oxley Links Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis.
WOH271	Land East of Wood Hayes Road, Wolverhampton	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> Site has been identified as Potential Site of Importance (for nature conservation). A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

WOH273	Moseley Road Open Space (part), Langdale Drive, Bilston	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • WTBBC understand the allocation is an area of public open space. It is WTBBC's position that due to the broad range of benefits that these sites provide local communities that no public open space should be allocated for development. On this basis we object.
WOH274	Former Wolverhampton Environment Centre, Westacre Crescent, Finchfield	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Adjoins LNR and SINC and therefore high potential for detrimental impact. • Adjoins Area of High Historic Landscape Value. • Access to development would require vehicle access across greenway. This conflicts with Policy CSP4 - Achieving well-designed places and Policy ENV8 – Open Space, Sport and Recreation.

Table 45 - Wolverhampton Employment Allocations in Black Country Plan – Policy EMP1

BCP Site Ref	Site name & address	Support Comment Object	Justification/comments
WOE737 BCRA	Bilston Urban Village	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of the presence of priority habitats and species (namely Open Mosaic Habitats on Previously Developed Land (OMHPDL), rare plants, butterflies and other notable invertebrates/of conservation concern). • Site forms part of important and well-connected area in Draft Local Nature Recovery Strategy.
WOE703 WCRA	Dean Road / Neachells Lane	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site is a Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. WTBBC therefore object to the allocation on this basis. • High potential for/evidence of presence of statutory protected species.
WOE735 BCRA	South of Citadel Junction, Bilston	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity. • The remainder of this site is identified as Potential Site of Importance. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

WOE723 SRCRA	Gas Holder site, Wolverhampton Science Park	Comment	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WOE662 BCRA	Former MEB site, Major Street / Dixon Street	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • High potential for/evidence of the presence of priority habitats and species.
WOE681 SRCRA	Cross Street North / Crown Street	Comment	<p>WTBBC request that the following is required of the site redevelopment:</p> <ul style="list-style-type: none"> • Site adjacent to a canal SINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent canal corridor (please also refer to WTBBC comment under policy ENV7) and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WOE755 BCRA	Rolls Royce Playing Field, Spring Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WOE725 SRCRA	Wolverhampton Business Park	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WOE698 WCRA	Phoenix Road	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.

WOE757 BCRA	Inverclyde Drive	Comment	<p>WTBBC request that the following is required of the site redevelopment:</p> <ul style="list-style-type: none"> • Site adjacent to a SLINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WOE694 WCRA	Land behind Keyline Builders Merchants Limited, Neachells Lane / Noose Lane	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WOE759 BCRA	Powerhouse, Commercial Road	Comment	<p>It is WTBBC's position that features within the site should be retained:</p> <ul style="list-style-type: none"> • Site adjacent to SINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent SLINC and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WOE727 SRCRA	Mammoth Drive, Wolverhampton Science Park	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site forms part of well-connected important area in Draft Local Nature Recovery Strategy and forms a stepping-stone link between two SLINCs.
WOE658 BCRA	Millfields Road, Ettingshall	Comment	<p>WTBBC request that the following is required of the site redevelopment:</p> <ul style="list-style-type: none"> • Site adjacent to a canal SINC: Include measures to ensure the development doesn't have both short and long term detrimental effects on the adjacent canal corridor (please also refer to WTBBC comment under policy ENV7) and, through the implementation of Black Country Plan Policy, support development that not only causes no damage but also delivers enhancements to the Local Nature Recovery Network.
WOE726 SRCRA	Stratosphere Site, Wolverhampton Science Park	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • The site includes an area of Site of Local Importance for Nature Conservation (SLINC). The National Planning Policy Framework (NPPF) states that Local Plans should safeguard components of local

			<p>wildlife-rich habitats and wider ecological networks, including locally designated sites of importance for biodiversity.</p> <ul style="list-style-type: none"> • The remainder of this site is identified as Potential Site of Importance. • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis.
WOE734 BCRA	Springvale Avenue	Object	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <ul style="list-style-type: none"> • Site has been identified as Potential Site of Importance (for nature conservation). • A Local (wildlife) Site Assessment is required to provide evidence to inform the BCP Site Assessment process. This has not been undertaken and therefore WTBBC object to the allocation on this basis. • Site scored Very High in Ecological Evaluation and forms part of well-connected Core Habitat area in Draft Local Nature Recovery Strategy. • High potential for/evidence of the presence of priority habitats and species.