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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.

			<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. • 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. • 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 Stourbridge 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 Local Importance for Nature Conservation (SLINC). 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.

DUH059	Former New Hawne Colliery, Hayseach 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. 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. • 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.

Policies for Strategic Allocations (Dudley)

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. • 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). • 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.

			<ul style="list-style-type: none"> • 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.

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> <ul style="list-style-type: none"> • WTBBC strongly recommend that alternative development sites are sought in order to prevent loss of green belt.

	Yieldfields farm), Stafford Road, Bloxwich		<ul style="list-style-type: none"> • 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.

			<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.
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. • 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 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. • 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.

			<ul style="list-style-type: none"> 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	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <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	<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). 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	<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 situated close to Site of Special Scientific Interest and therefore high potential for detrimental impact.
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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	<p>WTBBC have concluded that the Site Assessment process should not have selected site:</p> <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 and 201-205 Churchill Road, Bentley, Walsall	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 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.
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.

			<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.
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.

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.

			<ul style="list-style-type: none"> • 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.

			<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.
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.