

Rep ID	Respondent Name	Agent	Document Element	Representation	Support / Object	Officer Reponse
1673	National Highways (Kathryn Simmonite, Assistant Spatial Planner) [227]		APPENDIX B – Sandwell Site Allocations	<p>Allocation of Part of Rowley Regis Golf Course for Housing Development</p> <p>A portion of Rowley Regis Golf Course, located at Tiptity Green, Rowley Regis, is proposed for residential allocation for 250 new homes. This site was previously identified as a reasonable alternative during the Regulation 19 consultation and has been assessed in the Sustainability Appraisal Addendum. The appraisal identified some mixed effects but concluded that the allocation would not significantly alter the overall sustainability performance of the Plan.</p> <p>With regard to the SRN, transport modelling undertaken as part of the transport evidence base for the Local Plan (Black Country Modelling Report) indicates that the proposed development, including the Rowley Regis site, may have minor impacts on the SRN, specifically at M6 Junction 10 and M5 Junctions 1 and 2. However, these impacts are not considered significant. While some increases in congestion are anticipated during peak periods, overall SRN performance is expected to remain within acceptable parameters.</p>	Comment	Comment noted. The impact of residential development at the site on the highway network will be tested at planning application stage.
1676	Canal and River Trust (Mrs Tracy Humphreys, Area Planner - West Midlands) [12]		APPENDIX B – Sandwell Site Allocations	<p>The proposed allocation of part of Rowley Regis Golf Course, Tiptity Green, Rowley Regis, B66 9EJ for housing development</p> <p>The Trust has no waterways, assets or land interests within the area covered by this proposed allocation and as such we have no comment to make.</p>	Comment	Comment noted.
1679	National Grid [79]	Fisher German (Mrs Angela Brooks, Partner) [304]	APPENDIX B – Sandwell Site Allocations	Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.	Comment	Comment and standing advice noted.
1674	National Highways (Kathryn Simmonite, Assistant Spatial Planner) [227]		Policy SCC4 – Embodied carbon and waste	<p>Revisions to Policy SCC4 – Embodied Carbon and Waste</p> <p>Policy SCC4 has been amended to strengthen its commitment to reducing embodied carbon and managing waste. The Sustainability Appraisal concluded that these changes are unlikely to result in significant effects and that the policy continues to align with the Plan's sustainability objectives. National Highways has no further comments on this matter.</p>	Comment	Comment noted.
1677	Canal and River Trust (Mrs Tracy Humphreys, Area Planner - West Midlands) [12]		Policy SCC4 – Embodied carbon and waste	<p>Changes to the wording of Policy SCC4 – Embodied Carbon and Waste</p> <p>The Trust has no comments to make on this matter.</p>	Comment	Comment noted.
1675	National Highways (Kathryn Simmonite, Assistant Spatial Planner) [227]		Policy SNE2 – Protection and Enhancement of Wildlife Habitats	<p>Replacement of Hill House Farm as a Habitat Bank for Biodiversity Net Gain</p> <p>Hill House Farm has been removed as a potential habitat bank and replaced with Ray Hall Pastoral Land. The Sustainability Appraisal reviewed this change and found no significant impact on the Plan's sustainability performance. National Highways has no further comments on this matter.</p>	Comment	Comment noted.
1678	Canal and River Trust (Mrs Tracy Humphreys, Area Planner - West Midlands) [12]		Policy SNE2 – Protection and Enhancement of Wildlife Habitats	<p>The Trust notes that the Ray Hall Pastoral Land site boarders onto our asset, the Tame Valley Canal, to the east.</p> <p>Mandatory Biodiversity Net Gain was introduced into the planning system in Autumn 2023 for major developments and Spring 2024 for other qualifying developments. The Defra Biodiversity Metric requires that planning applications that include land within the site boundary that is within 10m of a canal or river and/or 5m of a ditch are supported by an assessment of the baseline condition of the watercourse. Paragraph 10.1.3, figure 10-1 and table 10-1 of the Biodiversity Metric 4.0 User Guide explain these requirements. It is the Trust's understanding that, unless exemptions apply, in these circumstances developers will need to deliver a minimum 10% net gain in watercourse biodiversity units. Development may also affect other habitat types on land owned by the Trust, including but not limited to, grassland, woodland, scrubland and hedgerows.</p> <p>Ecologists working on behalf of developers should obtain, and comply with, consents from the Trust to undertake any necessary habitat condition assessments and ecological surveys on our land, consistent with our Code of Practice. Further detail of this process can be obtained here: https://canalrivertrust.org.uk/business-andtrade/undertaking-works-on-our-property-and-our-code-of-practice</p> <p>The Trust will consider proposals from developers to deliver net gains on our land (be these watercourse units or other habitat types) on a case-by-case basis. In doing so, we will have regard to Defra's 'Sell biodiversity units as a land manager' guidance. The Trust's agreement to habitat enhancement activities being undertaken on our land will be subject to operational, management and commercial considerations.</p>	Comment	Comments noted.

1672	Sandwell Valley Naturalists (Mr Peter Shirley, President) [364]		APPENDIX A – Nature Recovery Network and Biodiversity Net Gain	Text Q1. This change greatly concerns us. As one of only six such sites in Sandwell we think it is critically important to retain the designation. This area is both strategically important for ecological connectivity and biodiversity in general, and locally important as a recently designated SINC and community semi-natural open space. We would expect the Plan to support enhancement and protection of such sites rather than apparently downgrading them. Not only is no reason given for the proposal, nothing is said about what the future intentions are for this area, which we believe to be a serious omission.	Object	The designation of Hill House Farm as a habitat bank was based on incomplete evidence. The site is subject to a Countryside Stewardship payment scheme, supporting the delivery of traditional farming techniques and management. This in turn benefits the environmental value of the land. As a result, the ability to designate the land for biodiversity net gain purposes would not be appropriate. The land will remain in active management and the identification of Ray Hall Pastoral Land as a substitute will ensure that the biodiversity value available through the creation of a habitat bank will be retained in the Sandwell Valley area. Hill House Farm is not being downgraded, as it will retain its current status and the management and maintenance routines currently being enacted as part of the Countryside Stewardship scheme.
1671	Mr Alexander Lane [180]		APPENDIX A – Nature Recovery Network and Biodiversity Net Gain	We are disappointed and concerned by the removal of a critically located habitat bank. This is an important ecological link connecting Sandwell to the wider conurbation and countryside beyond. It is a landscape that comprises a number of valuable habitats which warranted a recent designation as SINC. Investing in the management of this large area and its constituent habitats would have a significant positive impact in the wider borough's biodiversity (and beyond). The removal of this habitat bank not only reduces significantly the amount of BNG-credits available but it also reduces the types of habitats that those credits relate to.	Object	The designation of Hill House Farm as a habitat bank was based on incomplete evidence. The site is subject to a Countryside Stewardship payment scheme, supporting the delivery of traditional farming techniques and management. This in turn benefits the environmental value of the land. As a result, the ability to designate the land for biodiversity net gain purposes would not be appropriate. The land will remain in active management and the identification of Ray Hall Pastoral Land as a substitute will ensure that the biodiversity value available through the creation of a habitat bank will be retained in the Sandwell Valley area.
1670	Mr Alexander Lane [180]		APPENDIX B – Sandwell Site Allocations	We are concerned by the loss of habitats within the Alsopp's Hill SLINC. Regrettably, part of the SLINC had already been lost to development. It will also lead to a significant loss of greenspace within the area. This appears to be part of a Local plan pattern where several housing allocations overlap with important habitats and areas of greenspace/greenbelt. We are extremely concerned by the very significant impact this could have, to nature and the communities that live/work in Sandwell. Current supply of BNG-units within Sandwell is limited making adequate compensation for loss of habitats and greenspace less likely.	Object	Objection noted. A future planning application would be required to mitigate against any negative impact on the Alsopp's Hill SLINC which is located on part of the golf course. An Ecological Assessment will be required to determine the ecological value of the site and its capacity to accommodate species. Furthermore, residential development would be legally required to deliver Biodiversity Net Gain. The Golf Course is private land. Residential development at the site will improve public access and will lead to the creation of new publicly accessible open space.
1669	Environment Agency (Miss Keira Murphy) [361]		APPENDIX B – Sandwell Site Allocations	We have no objection to the proposed allocation or concerns regarding soundness. However, we would like to share some early advice regarding the current authorised landfill operation which lies near the proposed allocation. Our comments relate to the potential for landfill gas and the agents of change principle in the NPPF, which would both need to be addressed at the planning application stage. We are aware through the regulation of a neighbouring authorised landfill site, that there is the potential for landfill gas migration. See above for more details.	Support	Support noted. The agent of change principle will be applied at the planning application stage to ensure that existing business does not have unreasonable restrictions placed on them as a result of development permitted after they were established.
1668	Natural England (Sharon Jenkins, Assistant Officer) [360]		APPENDIX B – Sandwell Site Allocations	Proposed additional site allocation (Rowley Regis Golf Course – new housing allocation of 250 dwellings) We note that this housing allocation will reduce the available greenspace in the area for public access and that it is adjacent to a SINC site. We encourage the incorporation of appropriate functional and attractive Green Infrastructure and Urban Greening Factor (UGF) as part of the site, so that the nature conservation value of the adjacent SINC is not undermined as a stepping stone for nature. Natural England has no other significant comments to make on the Main Modifications for the Local Plan. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document. If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.	Support	Support noted. The Golf Course is private land. Residential development at the site will improve public access and will lead to the creation of new publicly accessible open space. A future planning application would be required to mitigate against any negative impact on the Alsopp's Hill SLINC which is located on part of the golf course. Furthermore, residential development would be legally required to deliver Biodiversity Net Gain.
1667	Dudley MBC (Vicki Popplewell) [51]		APPENDIX B – Sandwell Site Allocations	In respect of the Main Modification related to the proposed allocation of part of Rowley Regis Golf Course, Tipton Green, Rowley Regis, for housing development, Dudley Council reiterates its previous response submitted at Regulation 19 of the Sandwell Local Plan preparation to Policy SID1 - Infrastructure Provision and Viability Assessment in terms of any cross-boundary infrastructure implications being accounted for as part of detailed planning applications.	Support	Support noted. SMBC will continue to engage with Dudley Council and other adjacent local planning authorities in relation to planning applications which could have implications beyond Sandwell borough.