

Stourbridge Golf Course

13895/R01c Ecological Technical Note

15th April 2021

Introduction

Tyler Grange Group Ltd (TG) were instructed by the Feoffees of Old Swinford Hospital Foundation to provide ecological inputs as part of a feasibility study for a proposed development on an area to the north and south of Racecourse Lane, Stourbridge (central OS Grid Ref: SO897078226), hereinafter referred to as the 'site'. The site is to be considered for allocation within the emerging Black Country Plan (2026-2039)¹.

The site encompasses the Stourbridge Golf Course to the north of Racecourse Lane, and an area of arable farmland to the south. The proposals are for the development of residential housing in the area currently containing the golf club, and the creation of a new golf club, school, and medical facility to the south of Racecourse Lane.

This technical note has been informed by a desk study and an 'extended' Phase I Habitat Survey².

TG have worked with the Foundation to bring forward a scheme that retains and enhances the habitat of highest value within the proposed area of residential development and will not result in any adverse effects to any adopted locally designated sites.

The scheme, as outlined within this document, includes a variety of habitat creation and enhancement including the creation of large areas of heathland, and the creation of a new linear woodland feature throughout the development area, new woodlands in the proposed new golf course area, and the enhancement of retained woodland. The scheme also includes the creation of grassland habitats, tree and hedgerow planting, and the creation of aquatic habitats in the form of ponds and SuDS.

The scheme of habitat creation and enhancement proposed throughout the site would result in:

- The enhancement and extension of the habitats for which Pedmore Common SINC and Stourbridge Golf Course SLINC is designated;
- The extension and enhancement of Ounty John Wood SINC;
- An increase in connectivity for wildlife both within the site, and between the site and the wider green network; and

¹ <https://blackcountryplan.dudley.gov.uk/bcp/>

² <https://hub.jncc.gov.uk/assets/9578d07b-e018-4c66-9c1b-47110f14df2a>



- The restoration, enhancement, and creation of habitats of principal importance, including lowland heathland and dry acid grassland.

This note is set out in the following sections:

- 1) Baseline Habitats
- 2) Development Proposals
- 3) Impacts on Designated Sites and Habitats
- 4) Proposed Enhancement, Mitigation and Compensation
- 5) Review of Local and National Policy
- 6) Discussion on the Compliance of the Proposals with Relevant Policy; and
- 7) Conclusions

Appendices and plans are set out at the end of this note and are referred to specifically throughout this document where relevant.



Section 1: Baseline Habitats

Designated Sites

- 1.1. The golf course area of the site is covered by two non-statutory designated sites for nature conservation, as shown in **Figure 1** below. The western half of the golf course is designated as a Site of Importance for Nature Conservation (SINC), referred to as Pedmore Common. The eastern half is designated as a Site of Local Importance for Nature Conservation (SLINC), referred to as Stourbridge Golf Course. Additionally, two further SINCS are located near to the site, with Ounty John Wood adjacent to the eastern boundary of the arable farmland, and Norton Covert to the west of the arable farmland (locations for all sites shown in **Figure 1**).
- 1.2. The network of hedgerows and some fields containing semi-improved grassland throughout the arable farmland and in the land to the south is referred to as Farmland South of Racecourse Lane, which is a Candidate SLINC and is shown in **Figure 1** below. Candidate SLINCs have been assessed against the Local Wildlife Site criteria, but have not yet been formally adopted by the local planning authority.

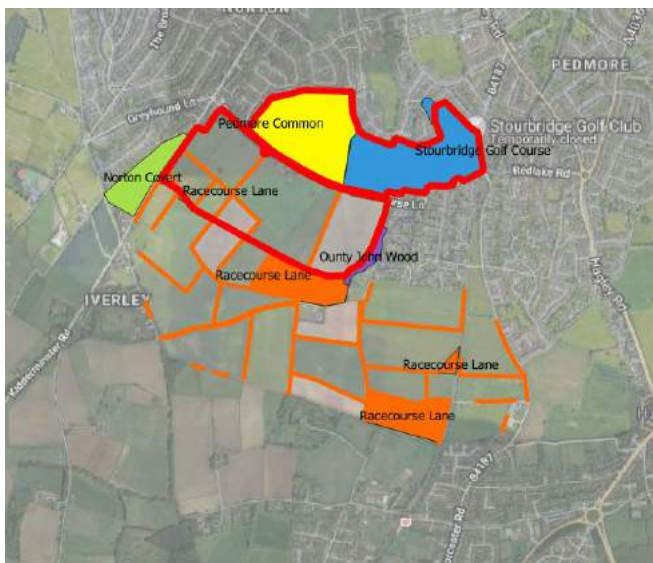


Figure 1 – Designated sites within or adjacent to the site.

- 1.3. Descriptions and qualifying criteria for the designated sites were collated from the local ecological records centre (EcoRecord) and are provided in **Table 1** below.



Table 1: Designated site descriptions from EcoRecord.

Designated Site	Description	Habitats of Note
Pedmore Common (SINC)	Formerly a historic common now a golf course with remnant areas of heathland and acid grassland. There is also some recent secondary woodland and many small, planted blocks.	Lowland heathland (Habitat of Principal Importance (HoPI) ³ (formerly referred to as UK Priority Habitat), lowland dry acid grassland (HoPI), broad-leaved woodland.
Stourbridge Golf Course (SLINC)	Area of formerly small fields adjacent to Pedmore Common now golf course. Much of site heavily managed with regularly mown grassland and areas of planted trees. Less intensively managed grassland is more diverse and somewhat acidic. Pond of amphibian value.	Acidic grassland, neutral grassland, standard trees, standing open water.
Ounty John Wood (SINC)	Strips of mature woodland with mature plantings of Beech <i>Fagus sylvatica</i> occupying formerly quarried slope.	Broad-leaved woodland
Norton Covert (SINC)	Former sand and gravel quarry colonized by woodland with some mature plantings of broad-leaved and coniferous trees.	Mixed woodland
Farmland south of Racecourse Lane (Candidate SLINC)	Farmland comprising of a network of old, species rich and diverse hedgerows and grassland, acidic in part, thought to support breeding skylark populations.	Neutral grassland – semi-improved; Hedgerow; Scrub

- 1.4. Norton Covert is separated from the site by the A451 Norton Road, and no impacts that require consideration at this stage are expected, therefore it will not be considered further.

Habitats

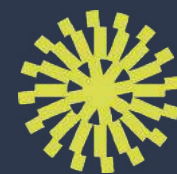
- 1.5. The site can broadly be separated into three sections, the SINC portion of the existing golf course, the SLINC portion of the existing golf course, and the arable land to the south of racecourse lane.
- 1.6. The habitats onsite are displayed on the Habitat Features Plan **13895/P02**.
- 1.7. The habitats within the SINC and SLINC are broadly similar due to their shared function as a golf course, and the associated intensive management. These habitats comprise:
- Amenity grassland, bare ground, buildings, ditches, lowland dry acid grassland, lowland heathland, mixed woodland, treelines and scattered trees, ornamental shrubs and hedges, scrub, and semi-improved neutral grassland.
- 1.8. The habitats within the arable section to the south of Racecourse Lane include:
- Arable fields and field margins, bracken, improved grassland, mature trees, native species-rich hedgerows and semi-improved neutral grassland.

³ <https://jncc.gov.uk/our-work/uk-bap-priority-habitats/>



Section 2: Development Proposals

- 2.1. The proposals for the site includes:
- The development of residential housing within the existing golf course, with new associated through roads, internal road networks, green infrastructure and areas of public open space;
 - The construction of a new school and healthcare facility to be located in the north west of the current arable section; and
 - The construction of a new 43 ha golf course in the arable section of the site.
- 2.2. An indicative masterplan is provided in **Appendix 4**.



Section 3: Impacts on Designated Sites and Habitats

- 3.1. This section will deal solely with the anticipated impacts to the habitats (and by default the designated sites) resulting from the proposals. The mitigation, enhancements, and compensation, as well as justifications for any impacts will be detailed in the following
- 3.2. As shown in the Opportunities and Constraints Plans **13895/P01a – P01c** and indicative masterplan at **Appendix 4**, we have worked with the Foundation to bring forward a scheme that retains the habitat of highest value within the proposed area of residential development. As such, the habitats onsite around the exterior of the existing golf course would be retained under the proposals. The areas where residential development would be focussed, and therefore the areas of habitat to be lost are concentrated in the interior of the course, which predominantly comprises areas of limited ecological value including amenity grassland, and standard trees.
- 3.3. It is worth noting that in the absence of a detailed masterplan, a 'worst-case' scenario has been considered to assess the potential impacts assuming a total loss of habitats within the development areas. It is very likely that the detailed proposals will be able to retain additional areas of existing habitats as well provide space for the creation of new ones as part of the wider green infrastructure strategy within the finalised scheme design.
- 3.4. The area for the new golf course assumes total loss of arable habitat and the associated field margins and hedgerows within the course. Whilst it may be possible to retain some hedgerows, it is unlikely that in their current spatial layout they would be suitable for retention within the golf course. It is assumed that the mature oak trees throughout the arable area will be retained within the design.
- 3.5. With the 'worst-case' scenario considered, the proposed development will result in a loss of approximately:
 - 0.0075 ha of lowland dry heath, namely the section described in the centre of the site comprising a small number of isolated individual heather plants in an acid grassland mosaic;
 - Up to 0.1336 ha of lowland acid grassland, including the area forming the mosaic with the dry heath described above, and the area forming a strip of transitional habitat between the mixed plantation woodland and amenity grassland towards the south of the interior of the site'
 - Up to 1.77 ha of semi-natural mixed woodland, 1.51 ha of plantation mixed woodland, and 3.1 ha of scattered standard trees;
 - Up to 23.24 ha of amenity grassland;
 - Up to 0.3 ha of semi-improved neutral grassland and bracken in the golf course, 4.25 ha of semi-improved neutral grassland in the arable section, and 2.81 ha of improved grassland in the arable section;



- Up to 38.7 ha of arable, with associated field margins and hedgerows;
- Up to 0.679 ha of bare ground, sand bunkers, ornamental shrubs and bramble scrub; and
- Up to 1.5 km of hedgerows.



Section 4: Proposed Enhancements, Mitigation, and Compensation

- 4.1. The proposed development would include the retention and enhancement of habitats outside of the proposed residential development areas, particularly those of relevance to the existing SINC and SLINC designations. The proposals also provide an extensive scheme of habitat creation to increase the overall extent of priority habitats and the enhancement. These measures would also have added benefits for the protected species and species of principal importance associated with them.
- 4.2. The habitat creation proposed includes the creation of habitats of principal importance (HoPI) within the area designated as a SINC and SLINC, including lowland heathland, dry acid grassland and semi-natural broadleaved woodland, as well as grassland and Sustainable Urban Drainage Systems (SuDS). The new golf course design will seek to largely replicate the existing habitats of the existing golf course SINC and SLINC, and will include lowland heathland and semi-natural broadleaved woodland, as well as grassland, scattered trees and treelines, and ponds. Each aspect of this habitat creation is described below.

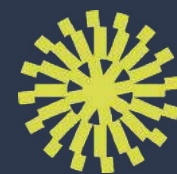
Heathland and Acid Grassland:

Proposed Residential Area

- 4.3. The lowland heathland and dry acid grassland habitats onsite are a Habitat of Principal Importance (HoPI)⁴ and are the primary qualifying habitats for the designation of the Pedmore Common SINC. It is considered that under a 'do-nothing' scenario, both areas of heathland onsite would likely be further diminished or lost entirely due to over management, nutrient enrichment, and encroachment by species associate with the amenity grassland.
- 4.4. The proposals would retain the larger of the two heathland/acid grassland mosaic areas onsite and seek to provide enhancement through improved management and supplementary planting as part of a long-term ecological management plan.
- 4.5. Proposals for the site include a significant area of heathland creation within the SINC of approximately 0.8ha, as shown on **Opportunities and Constraints Plan 13895/P01a**, which would enhance and expand the current small area of heathland present, providing approximately 1000% increase in the net area of heathland within the SINC.
- 4.6. Heathland restoration has been successfully completed at similar sites where grassland has invaded heath habitat, notably at Albury Heath in Surrey⁵, where turf stripping of unwanted grassland species around the heathland exposed the dwarf shrub seed bank which typically lays dormant for several years and allowed for successful recolonisation of heath species.
- 4.7. Furthermore, to aid successful restoration and creation of heathland, a variety of dwarf shrub species could be planted, such as bell heather *Erica cinerea*, bilberry *Vaccinium myrtillus*, cowberry

⁴ <https://jncc.gov.uk/our-work/uk-bap-priority-habitats/>

⁵ <http://publications.naturalengland.org.uk/file/63031>



Vaccinium vitis-idaea and western gorse *Ulex gallii* to provide coverage of more than 50% in the total area, which would increase the diversity of the heathland habitat, which is currently dominated by heather and gorse. An acid grassland meadow seed mixture⁶ could also be sown as appropriate throughout the new heathland mosaic area to provide an increased botanical diversity to the dry acid grassland habitat currently dominated by wavy hair grass *Deschampsia flexuosa* and matgrass *Nardus stricta*.

- 4.8. The heathland planting would be protected from grazing from rabbit or deer whilst establishing by appropriate exclusionary fencing, and long-term management scheme would be implemented to ensure the heathland established to and remained in a good condition, with a range of age classes in the dwarf shrubs present, and the cover of undesirable species, trees and scrub kept to a minimal level.

Proposed New Golf Course Area

- 4.9. Additionally, an area of the proposed new golf course (approximately 1.5 ha) could be given to heathland creation, which could be strategically located away from the amenity grassland to avoid a repeat of the encroachment by inappropriate management exhibited in the current golf course. This could be enacted through soil translocations from suitable existing heathland habitat, combined with an extensive planting scheme of dwarf shrub species. A long-term management plan could ensure that the heathland establishes successfully and is maintained in a good condition once established.
- 4.10. An extensive program of heathland creation throughout the site will result in a notable extent of this habitat in the context of the local area; retain, enhance, and expand the lowland heathland and lowland dry acid grassland habitats for which the Pedmore Common SINC is primarily designated; and provide an enhancement to the assemblages of protected and priority species which will utilise or benefit from these habitats, including birds, reptiles, and invertebrates.

Woodland and Scattered Trees:

Proposed Residential Area

- 4.11. The woodland areas in the current golf course are a qualifying habitat for the Pedmore Common SINC and the Stourbridge Golf Course SLINC. Several of the stands of woodland are also listed on MAGIC as deciduous woodland priority habitat. The majority of the woodlands onsite have a proportion of coniferous species present and are still evidently plantation woodland. Furthermore, the woodlands throughout the centre of the current golf course are all adversely impacted to various levels by the management of the golf course, with many stands being degraded through vegetation clearance, and dumping of turf and brash cuttings. The large woodland block in the west of the Stourbridge Golf Course SLINC has had a large section in the centre cleared and was used for storage of machinery and plant, and had large, dumped piles of litter, turf, and earth mounds.
- 4.12. As shown in the **Opportunities and Constraints Plans 13895/P01a-c**, the proposals will retain the semi-natural mixed woodland and plantation mixed woodland around the boundaries of the

⁶ <https://www.naturescape.co.uk/product/n12-acid-soils-meadow-mixture/>

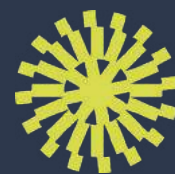


current golf course. The retained woodlands would be enhanced to a good condition through a long-term management plan. This would include selective felling and understory planting to ensure a diverse age and height structure and promote a more botanically diverse understory. Any deadwood resulting from the new management would be left in situ, and the presence of any undesirable or non-native species such as cherry laurel will be reduced and removed where possible.

- 4.13. Woodland creation throughout the boundaries of the Pedmore Common SINC and Stourbridge Golf Course SLINC is proposed, which, along with the retained woodland, would form a continuous linear woodland feature along the western and northern boundaries. Woodland planting should include native broad-leaved species reflective of the local environment, which will be managed through a long-term ecological management plan to ensure a good condition.
- 4.14. We have not considered the retention of any of the woodland or scattered trees within the development zone as part of a 'worst case' scenario until a detailed masterplan design is fixed. However, the residential development throughout the current golf course should seek to retain and enhance areas of scattered trees and woodland within the development area, which can be incorporated into the areas of public open space and green infrastructure.

Proposed New Golf Course Area

- 4.15. Large areas of woodland and scattered tree planting will be integral to the design of the new golf course, likely to be in a similar layout to the existing course. This will include woodland blocks and lines of scattered trees to delineate the different areas of the course, as well as large amounts of boundary planting. A large area of woodland planting should be focused on the eastern edge of the new golf course, adjacent to the offsite Ounty Johns Wood SINC. This should comprise of similar native broadleaf species to those in the existing woodland including beech *Fagus sylvatica*, with the aim of expanding and enhancing the qualifying habitats of the offsite SINC.
- 4.16. An extensive program of woodland and scattered tree planting throughout the proposed residential area and the new golf course will result in a notable increase in woodland habitat for which the SINC and SLINC are designated for throughout the site, and an enhancement of the retained woodland habitat. Woodland planting around the boundary of the residential area will create a linear woodland link between the Pedmore Common SINC and golf course SLINC and provide greater connectivity with the wider site. Woodland creation around the boundaries of the new golf course will expand and enhance the offsite Ounty John Wood SINC and provide increased connectivity and opportunities within and around the site for a wide range of protected and priority species that will benefit from this habitat, including bats, birds, badgers, and invertebrates.



Grassland:

Proposed Residential Area

- 4.17. At this point, have not considered the creation of any areas of grassland within the residential area of development, including the area of the proposed school and medical centre, as shown in **Appendix 4**. However, it is assumed that any design will be able to integrate amenity and neutral grassland, in combination with the retained and enhanced acid grassland described above, into the design of public open space.

Proposed New Golf Course Area

- 4.18. The majority of the habitat by area in the current golf course is amenity grassland, which is intensively managed year-round to a very short sward. This habitat type is generally of little ecological importance, however the extent of the habitat in this case is notable for the local area. The amenity grassland habitat will be entirely recreated to form the new golf course to the south of racecourse lane and will likely be managed in a similar way.
- 4.19. Several fields of species-poor semi-improved neutral grassland are present along the western boundary of the arable section of the site, and in the land to the south of the sites current red-line boundary. Some of these fields classified as qualifying habitats for the Racecourse Lane Candidate SLINC. The species diversity in these fields was not as varied as expected (even given the sub-optimal timings of the survey) and it is considered that the grassland habitats are being adversely impacted through intensive management and leaching of nutrients from adjacent agricultural fields. Areas of semi-improved neutral grassland could be incorporated into the design of the new golf course, with sections outside of the playing areas which could be managed for biodiversity.

Waterbodies:

Proposed Residential Area

- 4.20. Currently, the only waterbody within the site boundary is the Withy Brook, running along the eastern boundary of the Pedmore Common SINC. An offsite pond is also present to the north (which forms part of the Stourbridge Golf Course SLINC) which will be unaffected by the proposals.
- 4.21. The Withy Brook is straightened and heavily culverted on site and appears to dry annually for much of its length. Depending on non-ecological constraints, it may be possible to explore options to de-culvert and enhance the brook, and to integrate it as part of the green and blue infrastructure of the residential design.
- 4.22. Sustainable Urban Drainage Systems (SuDS) could also be incorporated into the design of the residential development, which could be designed to maximise value to biodiversity. This would provide additional habitat for a range of protected and priority species and introduce novel habitats to the Pedmore Common SLINC and Golf Course SLINC.



Proposed New Golf Course Area

- 4.23. The new golf course design could include water features in the form of ponds, which could be ecologically designed to maximise both amenity and biodiversity value. Ponds could be designed to an appropriate size and depth to permanently hold water, and the embankments adjacent habitats should be planted with aquatic and semi-aquatic plants, grassland, and scrub species of known value to biodiversity.
- 4.24. This creation of new waterbodies throughout the site in the form of ponds and SuDS areas, in combination with any naturalisation of the Withy Brook, would provide new aquatic habitats on the site, offering increased variety of habitats to both the designated sites and the new golf course area. An increase in aquatic habitats would provide additional breeding opportunities for a variety of protected and priority species, including amphibians and invertebrates, and in turn provide foraging opportunities for species which predate upon them, including birds and bats.

Hedgerows:

- 4.25. The network of hedgerows within the arable section of the site, and throughout the field network to the south are a HoPI and are qualifying habitats of the Racecourse Lane Candidate SLINC. The hedgerow network throughout the site was in a poor condition, and many were defunct due to the current management regime of annual flail cutting to approximately 1.5m, homogenous planting, and the presence of significant and frequent gaps in the hedgerow network.
- 4.26. The creation of new species-rich hedgerows could be incorporated along the southern boundary of the new golf, with these new hedgerows managed to ensure a good condition and maximise biodiversity value and could compensate for the necessary loss of the hedgerow within the areas of the proposed new golf course.

Fauna:

- 4.27. The habitat creation proposals described above, would result in a wide range of enhancements for protected and priority species.
- 4.28. New waterbodies, woodlands, hedgerows, and grassland will provide an increase in potential breeding and terrestrial habitat for a range of amphibian species. The creation of the linear woodland feature throughout the Pedmore Common SINC and Stourbridge Golf Course SLINC, along with the new woodland planting through the site would provide dark foraging and commuting routes for bats and badgers. Heathland, grassland, and the mosaic of habitats in the new golf course will provide suitable habitats for reptiles and invertebrates. The habitat creation will also result in an increase in suitable foraging and nesting habitats for wide range of common and priority bird species.
- 4.29. As Phase II ecological surveys have not been undertaken at this stage, the exact mitigation and enhancement requirements and opportunities cannot be commented on in detail. However, due to the scope of habitat creation, and the fact opportunities to incorporate enhancement and mitigation into both the design of the proposals and the future management of the wider site, it is



considered that notable improvements for any species of fauna utilising the site is achievable as a result of a proposed development.



Section 5: Relevant Legislation and Policy

- 5.1. This following national and local legislation and policy relating to biodiversity, particularly with regards to habitats, are relevant to the considerations for this site in this note. Full details are given in **Appendix 3**.
- **Natural Environment and Rural Communities (NERC) Act 2006**
 - **National Planning Policy Framework (NPPF), February 2019**
 - **Black Country Core Strategy (Adopted February 2011)**
 - Policy ENV1 – Nature Conservation
 - Policy CSP3 – Environmental Infrastructure
 - **Dudley Borough Development Strategy (Adopted March 2017)**
 - Policy S19 – Dudley Borough’s Green Network
 - Policy S21 – Nature Conservation, Enhancement, Mitigation and Compensation
 - Policy S22 – Mature Trees, Woodland and Ancient Woodland
- 5.2. The emerging Black Country Plan is at an early stage and no biodiversity policies have yet been prepared. In the absence of any detailed emerging policies, we have considered the relevant policies contained in the adopted Black Country Core Strategy.



Section 6: Discussion on compliance of proposals with policy

- 6.1. The habitat retention, enhancement and creation described in **Section 4** form a mitigation strategy for the site, which complies with national legislation, and national and local policy. The compliance of the strategy with regards to relevant policy is discussed below, in **Table 3** with specific regards to the Black Country Core Strategy Policy ENV1, and in the subsequent discussion with regards to other policies.
- 6.2. Illustrative representations of the habitat enhancement and creation proposed both onsite and offsite are shown on the opportunities and constraints plans **13895/P01a-c**.

Table 3: Compliance with ENV1

Black Country Core Strategy Policy ENV1	Mitigation Strategy
<p>Development is not permitted where it would harm internationally, nationally, or regionally (Sites of Importance for Nature Conservation) designated nature sites</p>	<p>The proposals would result in an overall reduction in the area of the Pedmore Common SINC. However, the majority of the area to be lost under the proposals would be the amenity grassland within the playing areas of the golf course, which is limited value to biodiversity.</p> <p>Development would require the loss of areas of woodland within the interior of the SINC. However, these woodlands are mostly mixed plantation woodlands, managed to a poor condition as a consequence of the site's current management regime.</p> <p>The strategy for the site would retain the woodland around the boundary of the SINC, which is currently managed to a higher condition, and compensation for the loss of woodland would be provided within the SINC boundary, through the creation of an extensive linear woodland feature stretching around the entire site boundary. Overall, there will be a net increase in the amount of woodland throughout the entire site, which will be strategically designed to maximise connectivity and biodiversity value.</p> <p>The Habitats of Principal Importance (HoPI) for which the SINC is designated, namely lowland heathland and dry acid grassland, will be significantly enhanced as a result of the proposals. A negligible area of heathland, and small area of acid grassland in the interior of the SINC will be lost to the development. However, the proposals will incorporate an extensive scheme of heathland restoration and creation, which will enhance and expand the retained</p>



Black Country Core Strategy Policy ENV1	Mitigation Strategy
	<p>habitat, resulting in approximately a 1000% net increase in the heathland and acid grassland Habitats.</p> <p>Whilst there would be an overall reduction in the area of the SINC, it is considered that the enhancement, mitigation and compensation proposed within the SINC and throughout the wider site would result in an enhancement and extension of the qualifying habitats for which it is designated and provide greater connectivity between the SINC and nearby designated sites as well as the wider green network.</p> <p>Additionally, Ounty John Wood SINC which is located adjacent to the site boundary would benefit from an enhancement and expansion of the qualifying habitats as a result of a programme of woodland planting within the area of site adjacent to the Woods boundary.</p> <p>Therefore, the proposals should not be considered harmful to the any of the regionally designated nature sites within or adjacent to the site boundary and should therefore be considered to be compliant with policy ENV1.</p>
<p>Locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals which could negatively impact upon them.</p> <p>Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.</p>	<p>The proposals will result in an overall reduction in the area of the Stourbridge Golf Course SLINC. However, as with the Pedmore Common SINC, the majority of area to be lost under the proposals would be the amenity grassland areas within the golf course.</p> <p>Development would necessitate the loss of woodland and standard trees within the interior of the SLINC. The large stand of woodland to be lost is currently in poor condition, with much of the centre of the woodland cleared, with standard trees forming the remainder of the habitat to be lost.</p> <p>To compensate for this loss of woodland and standard trees, an extensive programme of tree planting and woodland creation is proposed both within the SLINC and the wider site. This includes the creation of a linked-up linear woodland providing increased connectivity between the Pedmore Common SINC and Stourbridge Golf Course SLINC, which would be managed to</p>



Black Country Core Strategy Policy ENV1	Mitigation Strategy
	<p>enhance the areas of retained and created woodland to a good condition.</p> <p>The creation of the new golf course to the south will aim to largely replicate, expand and enhance the existing habitats within the SLINC (and SINC), and will include a large amount of woodland creation and tree planting, resulting in a net increase in the amount of woodland and trees throughout the wider site.</p> <p>The waterbody for which the SLINC is designated for is to be unaffected by the proposals, and the creation of new areas of SuDS within the residential area and ponds within the new golf course will provide an increase in aquatic habitat throughout the site.</p> <p>It is considered that the adverse impacts to the SLINC would be more than compensated for through the habitat enhancement and creation proposed.</p>
<p>The movement of wildlife within the Black Country and its adjoining areas, through linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping stone sites) is not impeded by development;</p>	<p>The habitat enhancement and creation proposed in Section 4 would provide an increase in connectivity both within the site and to the wider green network. The linear woodland created along the boundary of the proposed residential area, the extensive woodland and tree line planting throughout the proposed golf course would provide increased opportunities for the movement of a wide range of wildlife species within the site and the wider green network.</p>
<p>Species which are legally protected, in decline, are rare within the Black Country or which are covered by national, regional or local Biodiversity Action Plans will not be harmed by development.</p>	<p>New waterbodies, woodlands, hedgerows, and grassland will provide an increase in potential breeding and terrestrial habitat for a range of amphibian species. The creation of the linear woodland feature throughout the Pedmore Common SINC and Stourbridge Golf Course SLINC, along with the new woodland planting through the site would provide dark foraging and commuting routes for bats and badgers. Heathland, grassland, and the mosaic of habitats in the new golf course will provide suitable habitats for reptiles and invertebrates.</p> <p>The habitat creation will also result in an increase in suitable foraging and nesting habitats for wide range of common and priority bird species.</p>



Black Country Core Strategy Policy ENV1	Mitigation Strategy
	It is considered that the proposals will provide increased opportunities for any protected or priority species present within the local area.
<p>All appropriate development should positively contribute to the natural environment of the Black Country by:</p> <ul style="list-style-type: none"> • Extending nature conservation sites; • Improving wildlife movement; and/or • Restoring or creating habitats which actively contribute to the implementation of Biodiversity action Plans. 	<p>The habitat creation and enhancement strategy will result in:</p> <ul style="list-style-type: none"> • The extension and enhancement of Ounty John Wood SINC; • The enhancement and extension of the habitats for which Pedmore Common SINC and Stourbridge Golf Course SLINC is designated; • An increase in connectivity for wildlife both within the site, and between the site and the wider green network; and • The restoration, enhancement and creation of habitats of principal importance, including lowland heathland and dry acid grassland.

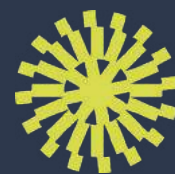
Proposed Residential Area

- 6.3. The proposals would necessitate the building of residential development within the areas designated as Pedmore Common SINC, and Stourbridge Golf Course SLINC. The habitat creation proposed within the Pedmore Common SINC includes the creation of a large area of lowland heathland and dry acid grassland, which will enhance and expand on the retained habitat, resulting in approximately a 1000% net increase in the heathland and acid grassland Habitats of Principal Importance for which the SINC is designated (within its current boundary).
- 6.4. To compensate for the loss of mature trees and woodland within the SINC and SLINC, an extensive programme of woodland enhancement and creation will result in the formation of a linked-up linear woodland providing increased connectivity between the Pedmore Common SINC and Stourbridge Golf Course SLINC in an enhanced condition to its current state. The retained and created heathland and woodland throughout the SINC and SLINC would be enhanced through a long-term management plan, designed to maximise the condition and biodiversity value of the habitats.
- 6.5. The Stourbridge Golf Course SLINC is also designated for the large offsite pond to the north, which will remain entirely unaffected by the proposals, and the creation of new areas of SuDS and ponds will provide an increase in aquatic habitat throughout the site.
- 6.6. This strategy of habitat retention, enhancement and creation throughout the SINC and SLINC are considered to be in line with ENV1 as discussed in **Table 3**, and national policy and legislation including NERC Act (2006) and NPPF, and local policies CSP3, S19, S21 and S22.



Proposed New Golf Course Area

- 6.7. As part of the proposals, a new golf course will be created just south of Racecourse Lane, which will broadly replicate, expand, and enhance the habitats currently found within the existing golf course SINC and SLINC. This will include further large areas of heathland, as well as substantial woodland and tree planting throughout the interior and boundaries of the course. Woodland planting in the new golf course will include targeted planting along the eastern boundary, with the aim of expanding and enhancing the offsite Ounty John's Wood SINC and providing increased connectivity between Ounty Johns Wood and the other designated sites present in or adjacent to the site boundary, in-line with NERC, NPPF, ENV1, CSP3, S19, S21, and S22.
- 6.8. The habitat creation throughout both the residential area and the new golf course will include a variety of priority and non-priority habitats, including lowland heathland, dry acid grassland, native broadleaved woodland, scattered trees, hedgerows, ponds and SuDS, neutral and amenity grassland. These will be incorporated into the detailed design in a way that aims to maximise both the biodiversity and amenity value of the site, as well as the site's context and value within the wider Dudley Borough green network.
- 6.9. The habitat creation and enhancement will ensure that the qualifying habitats for Pedmore Common SINC, Ounty Johns Wood SINC, and Stourbridge Golf Course SLINC will be retained and enhanced, with a net increase in the qualifying habitats of each throughout the site; increased connectivity between the designated sites and the wider Dudley Borough green network; and an increase and enhancement of priority habitats across the wider site, in-line with national policy and legislation including NERC Act 2006 and NPPF, and local policies ENV1, CSP3, S19, S21, and S22.
- 6.10. In the medium to long term, given the extensive habitat creation proposed throughout the new golf course, it is considered that the newly created course could, once established, be assessed against the local wildlife site selection criteria, to be considered for designation as a non-statutory site.

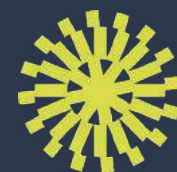


Section 7: Conclusion

- 7.1. With the implementation of the habitat retention, enhancement and creation measures outlined **Section 4**, and broadly illustrated in **13895/P01a-c**, it is considered that the proposed development **will not result in any adverse effects to any adopted locally designated sites**. The proposals will ultimately result in an increase in the condition and net area of the qualifying habitats for locally designated sites, including Pedmore Common SINC, Stourbridge Golf Course SLINC, and Ounty Johns Wood SINC, and increase the connectivity between each of the designated sites, as well as with the wider green network for wildlife.
- 7.2. There are opportunities to enhance, expand and create a number of habitats including Habitats of Principal Importance throughout and beyond the site, and to create new and enhanced opportunities for a varied assemblage of wildlife. The proposals would in the medium to long term, enhance the locally designated sites, create new important habitats in the context of the local area, and provide increase connectivity both within the site, and to the wider area.
- 7.3. The habitat creation and enhancement strategy outlined within this document would result in:
- The enhancement and extension of the habitats for which Pedmore Common SINC and Stourbridge Golf Course SLINC is designated;
 - The extension and enhancement of Ounty John Wood SINC;
 - An increase in connectivity for wildlife both within the site, and between the site and the wider green network; and
 - The restoration, enhancement, and creation of habitats of principal importance, including lowland heathland and dry acid grassland.
- 7.4. A comprehensive long-term ecological management plan produced as part of any future planning application for the site could provide the necessary assurances that any development at the site would enhance and expand upon the designated sites, priority habitats and other features of ecological importance within and adjacent to the site, provide increased connectivity between the site and the wider green network, and would meet the ambitions of all national and local policy and legislation relating to biodiversity.

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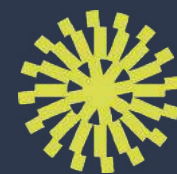


Appendix 1 – Habitat Descriptions

Table A1.1 The habitats described within are shown on the habitats and features plan 13895/P02.

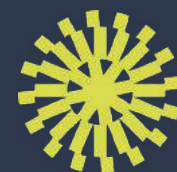
Habitat	Description
SINC & SLINC	
Amenity Grassland	<p>The majority of the SINC and SLINC comprised amenity grassland, managed to an extremely short sward throughout the playing areas of the golf course, including the greens and fairways. Most of the areas of 'rough' outside of the fairways were also managed to a very short sward and comprised similar amenity species. Amenity grassland also formed the understory of most scattered trees onsite, as well as certain areas of plantation mixed woodland.</p> <p>The amenity grassland was dominated throughout by perennial rye <i>Lolium perenne</i> and red fescue <i>Festuca rubra</i>.</p>
Bare Ground	<p>Areas of bare ground where the turf had been stripped were present throughout both the SINC and SLINC. It is presumed that these areas will be re-seeded with a grass mix.</p> <p>Sand bunkers were present throughout the golf course.</p>
Buildings	<p>Several structures were present throughout the golf course, ranging from the brick-built clubhouse and groundskeepers' buildings to various open shelters and toilet blocks, constructed of wood and corrugated metal.</p>
Ditch	<p>The Withy Brook runs north to south across the golf course, roughly following the eastern boundary of the SINC. The brook is heavily culverted and straightened, and it ran dry for the majority of its length within the golf course.</p>
Lowland Dry Acid Grassland	<p>Small, discrete areas of lowland dry acid grassland were present within the SINC, which was dominated by wavy hair-grass <i>Deschampsia flexuosa</i>, with matgrass <i>Nardus stricta</i> also present.</p> <p>The largest area of approximately 0.2 ha was found in a mosaic with lowland heathland habitat towards the north of the SINC.</p> <p>A very small area (approx. 0.03 ha) was also found in a mosaic with some relict lowland heathland habitat in the centre of the SINC, and in a thin strip along the southern boundary of the plantation woodland towards the south of the SINC.</p> <p>In all cases, the acid grassland was being heavily encroached by amenity species, suggesting significant nutrient enrichment and over management. Lowland Dry Acid Grassland is a UK Priority Habitat⁷.</p>

⁷ <https://data.jncc.gov.uk/data/902cafc6-578f-43de-8a99-7143f00d79a2/UKBAP-BAPHabitats-26-LowlandDryAcidGrass.pdf>



<p>Lowland Heathland</p>	<p>Two small discrete areas of relict lowland heathland were present within the SINC, which were dominated by heather <i>Calluna vulgaris</i>, with gorse <i>Ulex europaeus</i> also present. The heathland comprised a larger area to the north of the SINC (0.09 ha), and a small patch in the centre (0.0075 ha), the smaller patch formed of just a few remaining isolated individual heather plants. The heathland habitats formed a mosaic with lowland dry acid grassland, with wavy-hair grass, matgrass, broom <i>Cytisus scoparius</i> and hawkbit <i>Leontodon sp.</i> present.</p> <p>The heathland was overly managed and increasingly encroached by the amenity grassland and associated management. The smaller stand in the centre of the site is considered likely to be lost entirely with the current management practices.</p> <p>Lowland heathland is a UK Priority Habitat⁸.</p>
<p>Mixed Woodland, Treelines and Scattered Trees</p>	<p>The boundaries and much of the interior of the golf course contained areas of semi-natural mixed woodland, plantation mixed woodland, and mature and newly planted scattered trees. The woodlands were dominated by broad-leaved species, although coniferous species were present throughout. These areas, particularly in the interior of the site, were primarily planted for amenity purposes, delineating the various fairways of the golf course.</p> <p>The semi-natural mixed woodland and the plantation mixed woodland comprised largely similar species, although the semi-natural woodlands along the site boundaries appeared to show more natural evidence of successional woodland, compared to the monotemporal specimens and evident planting patterns observed in much of the plantation woodland.</p> <p>Scattered trees throughout the site contained similar species to the woodlands, with age classes ranging from newly planted specimens to fully mature trees.</p> <p>Species included Scot's pine <i>Pinus sylvestris</i>, beech <i>Fagus sylvatica</i>, oak <i>Quercus robur</i>, holly <i>Ilex aquifolium</i>, yew <i>Taxus baccata</i>, sycamore <i>Acer pseudoplatanus</i>, silver birch <i>Betula pendula</i>, rowan <i>Sorbus aucuparia</i>, Leyland cypress <i>Cupressus x leylandii</i>, crack willow <i>Salix fragilis</i>, elder <i>Sambucus nigra</i>, alder <i>Alnus glutinosa</i>, hawthorn <i>Crataegus monogyna</i>, larch <i>Larix decidua</i>, plum <i>Prunus domestica</i>, cherry <i>Prunus avium</i>, horse chestnut <i>Aesculus hippocastanum</i>, blackthorn <i>Prunus spinosa</i>, western red cedar <i>Thuja plicata</i>, ash <i>Fraxinus excelsior</i>, and weeping willow <i>Salix babylonica</i>.</p> <p>The understory of most of the woodlands was dominated by dense bramble <i>Rubus fruticosus</i>, ivy <i>Hedera helix</i>, and holly. Other species recorded throughout the site included rosebay willowherb <i>Chamaenerion angustifolium</i>, herb robert <i>Geranium robertianum</i>, bluebells <i>Hyacinthoides sp.</i>, cherry laurel <i>Prunus laurocerasus</i>, and daffodil <i>Narcissus pseudonarcissus</i>. The area of woodland along the Withy Brook also included Broad buckler-fern <i>Dryopteris dilatata</i>.</p> <p>The majority of the woodlands appeared to be heavily disturbed, particularly in the interior of the site. Large mounds of bare earth, turf, and brash cuttings from the management of the site are regularly dumped into the understory</p>

⁸ <https://www.nature.scot/sites/default/files/2018-02/Priority%20Habitat%20-%20Lowland%20Heathland.pdf>



	<p>of the woodlands. The large woodland to the west of the SLINC has also had a large portion in the centre cleared, with piles of bare earth, storage of plant and machinery, and litter frequent throughout.</p> <p>Scattered trees appeared throughout the site, forming rows of trees in many places between the fairways, as well as isolated stands of trees. The trees all appeared regularly managed, and generally had an understory of amenity grassland, with very occasional shrubs including gorse, broom, and rhododendron <i>Rhododendron ponticum</i>.</p> <p>Treelines formed the majority of the site boundary outside of the woodlands, which comprised similar species to the woodlands, including holly, ash, cherry, oak, elder and sycamore.</p> <p>Several of the areas of woodland onsite are classified as Priority Habitat – Deciduous Woodland on MAGIC⁹.</p>
Ornamental Shrubs and Hedges	<p>Ornamental hedgerows were located along the boundaries separating the golf course and residential gardens, including cherry laurel, beech and Leyland cypress, with an understory of ivy, brassicas, nettles <i>Urtica dioica</i> and dandelion <i>Taraxacum officinale</i>.</p> <p>Several ornamental shrubs were planted throughout the golf course, including rhododendron <i>Rhododendron sp.</i></p>
Scrub	<p>Discrete areas of dense bramble scrub were located in unmanaged areas around the site boundary throughout the golf course.</p>
Semi-improved Neutral Grassland	<p>Small discrete areas of semi-improved neutral grassland were present in less managed areas of 'rough' grassland throughout the course. Species included cocksfoot <i>Dactylis glomerata</i>, tufted hair grass <i>Deschampsia cespitosa</i>, perennial rye, red fescue, yarrow <i>Achillea millefolium</i>, cow parsley <i>Anthriscus sylvestris</i>, oxeye daisy <i>Leucanthemum vulgare</i>, daisy <i>Bellis perennis</i>, rosebay willowherb, bramble, hogweed <i>Heracleum sphondylium</i>, and dandelion.</p> <p>Wavy hair-grass occurred rarely in the grassland areas within the SLINC, although not frequently enough to categorise the areas as acid grassland.</p>
Arable Areas	
Arable	<p>The majority of the land to the south of racecourse lane comprised of arable fields, which were at the time of survey, either freshly ploughed, or containing wheat crop stubble.</p> <p>The field margins are narrow and encroached by the arable. Species recorded included cocksfoot, nettles, rosebay willowherb, groundsel <i>Senecio vulgaris</i>, cleavers <i>Galium aparine</i>, burdock <i>Arctium sp.</i>, creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, green alkanet <i>Pentaglottis sempervirens</i>, herb robert, cow parsley, cut-leaf geranium <i>Geranium dissectum</i>, germander speedwell <i>Veronica chamaedrys</i>, white dead-nettle <i>Lamium album</i>, and red dead-nettle <i>Lamium purpureum</i>.</p> <p>Sections of the arable have been left as bare earth due to regular movements of farm machinery.</p>

⁹ <https://magic.defra.gov.uk/magicmap.aspx>



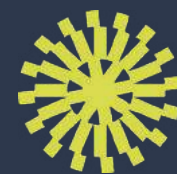
Bracken	A large stand of bracken <i>Pteridium aquilinum</i> was located on an embankment towards the south of the arable area.
Hedgerows	<p>Most of the fields in the arable areas were bounded by hedgerows. Species included hawthorn, blackthorn, ash, elder, sycamore, oak, holly, hazel <i>Corylus avellana</i> and field maple <i>Acer campestre</i>. The majority of the hedgerows on site were heavily managed through annual flail cutting, and were in a poor condition. Most hedgerows were at or under a height and width of 1.5m, and many were 'leggy' with gaps between the ground and the body of the hedge over 0.5m. Additionally, many hedges were defunct, with several gaps over 5m, and up to 20m in sections.</p> <p>Whilst there is enough variety of species present overall to consider the hedgerows as species rich, most of the hedgerows are planted in large linear blocks of single species.</p>
Mature Trees	Several mature oaks were located throughout the hedgerows and scattered in arable fields throughout the site. Many displayed veteran features, and would likely be classified as such. Mature sycamore and apple <i>Malus sylvestris</i> trees were also present in some boundaries of the arable fields.
Semi-improved Neutral and Improved Grassland	<p>Several fields containing poor semi-improved neutral grassland were located throughout the arable section of the site, with species including perennial rye, cocksfoot, tufted hairgrass, red fescue, ragwort <i>Jacobaea vulgaris</i>, and pointed spear moss <i>Calliergonella cuspidata</i>.</p> <p>The field in the north western corner of the arable area contained improved grassland in use as horse pasture, with a large strip of bare earth and hardstanding located through the middle.</p>



Appendix 2 – Potential for Fauna

Table A2.1: Potential for Fauna on site

Species	Potential for the Species on Site
Amphibians	<p>The Withy brook has potential to support species such as common toad <i>Bufo bufo</i> and common frog <i>Rana temporaria</i>. Frogspawn was observed in the wet areas of the brook.</p> <p>Great Crested Newt <i>Triturus cristata</i> are not considered likely to use the brook as breeding habitat, as it is heavily culverted and dries annually.</p> <p>The offsite waterbody to the north of the SLINC may provide suitable habitat for amphibian species including GCN and common toad, and the woodland and scrub habitat onsite may provide terrestrial habitat.</p>
Bats	The mature trees and onsite buildings may provide roosting opportunities for a range of bat species, and the grassland, woodland, treelines and hedgerows provide opportunities for commuting and foraging.
Birds	<p>The arable farmland is likely to support an assemblage of priority farmland bird species, including yellowhammer <i>Emberiza citrinella</i> and skylark <i>Alauda arvensis</i> which were observed onsite.</p> <p>The golf course offers a range of habitats, likely to support breeding and foraging assemblages of a number of priority and common species.</p>
Invertebrates	The heathland, sand bunkers, woodland and mature trees in the golf course, and the hedgerows, field margins and grassland in the arable areas of the site offer potentially optimal habitat for a wide range of invertebrate species.
Reptiles	The golf course offers a mosaic of habitats including grassland, woodland, and small areas of heathland, that are optimal for common reptile species.



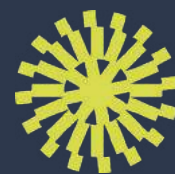
Appendix 3 – Relevant Legislation and Policy Wording

Natural Environment and Rural Communities (NERC) Act 2006

- A3.1. Priority Species and Habitats identified under the UK Biodiversity Action Plan are referred to as Species and Habitats of Principal Importance for the conservation of biodiversity in England and Wales within Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England in Section 40 of the NERC Act 2006.

National Planning Policy Framework (NPPF), February 2019.

- A3.2. Paragraph 11 states that: “Plans and decisions should apply a presumption in favour of sustainable development.”
- A3.3. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment.
- A3.4. Paragraph 170 states that planning and decisions should contribute to and enhance the natural and local environment by:
- a) *“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
 - d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”*
- A3.5. Paragraph 171 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- A3.6. Paragraph 174 states that in order to protect and enhance biodiversity and geodiversity, plans should:
- a) *“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; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
 - b) *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*



A3.7. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- a) *“if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”*

A3.8. As stated in paragraph 176 the following should be given the same protection as habitats sites:

- a) *“potential Special Protection Areas and possible Special Areas of Conservation;*
- b) *listed or proposed Ramsar sites; and*
- c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

A3.9. Paragraph 177 states the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects) unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System

A3.10. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A3.11. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A3.12. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material



consideration in the preparation of local development documents and the making of planning decisions.

- A3.13. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

Black Country Core Strategy (Adopted February 2011)

ENV1 Nature Conservation:

- A3.14. Development within the Black Country will safeguard nature conservation, inside and outside its boundaries by ensuring that:

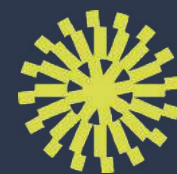
- Development is not permitted where it would harm internationally (Special Areas of Conservation), nationally (Sites of Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserve and Sites of Importance for Nature Conservation) designated nature conservation sites;
- Locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals which could negatively impact upon them;
- The movement of wildlife within the Black Country and its adjoining areas, through linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping stone sites) is not impeded by development;
- Species which are legally protected, in decline, are rare within the Black Country or which are covered by national, regional or local Biodiversity Action Plans will not be harmed by development.

- A3.15. Adequate information must be submitted with planning applications for proposals which may affect any designated site or any importance habitat, species or geological feature to ensure that the likely impacts of the proposal can be fully assessed. Without this there will be a presumption against granting permission.

- A3.16. Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.

- A3.17. All appropriate development should positively contribute to the natural environment of the Black Country by:

- Extending nature conservation sites;
- Improving wildlife movement; and/pr
- Restoring or creating habitats which actively contribute to the implementation of Biodiversity action Plans.



CSP3 – Environmental Infrastructure:

- A3.18. Development proposals will need to demonstrate that the strategic network of environmental infrastructure will be protected, enhanced, and expanded at every opportunity.
- A3.19. The environmental infrastructure network comprises open space, sport and recreation facilities, areas of biodiversity and geodiversity importance, wildlife corridors, the canal network, watercourses and drainage systems, air quality and renewable energy generation, pedestrian and cycle routes, areas and buildings of high design quality and the special character and historic aspects of locally distinctive elements of the Black Country.

Dudley Borough Development Strategy (Adopted March 2017)

S19 – Dudley Borough's Green Network:

- A3.20. Requires all development (except householder development) falling within the Dudley Borough green network or adjacent to it, to provide a Green network impact statement to demonstrate how the integrity and connectivity of the affected area would not be prejudiced. The green network comprised interlinked green spaces forming a continuous, natural network through the urban area and into adjoining countryside areas which are important wildlife corridors allowing species to move between habitats within heavily urbanised parts of the Dudley Borough, and additionally provides an important outdoor recreation resource for local residents.

S21 – Nature Conservation, Enhancement, Mitigation and Compensation:

- A3.21. Dudley Council will safeguard and enhance designated nature conservation sites, habitats and features through the development process and in accordance with the Core Strategy, in particular Policy ENV1. Developments in the Borough will be positively encouraged where they demonstrate improvements, expansion or increased links to nature conservation sites.
- A3.22. Exceptionally, where the strategic or community benefits of a development clearly outweigh the nature conservation importance of the area impacted upon, Dudley Council will ensure that any damage or loss of nature conservation assets is fully offset by additional nature conservation improvement works. It will be expected that these will normally be accommodate on-site. However where there are exceptional circumstances, which prevent this, off-site works will be required instead.

S22 – Mature Trees, Woodland and Ancient Woodland:

- A3.23. Development which would adversely affect Ancient Woodland and Ancient Trees will not be permitted, and measures will be taken to restore these areas and where appropriate, expand them with new complimentary planting, particularly to encourage linked woodland areas. In addition, the Council will ensure that other woodland as well as ancient, notable or veteran trees are protected and will seek to encourage the appropriate management of existing trees and woodland, and additional tree planting. Where trees are affected by development, applications will be required to provide full details of any impact. Proposals involving the loss of mature and semi-mature trees will normally be required to include replacement tree planting. The council will



require that native species of local provenance are used in planting and landscaping wherever possible.



Appendix 4 – Indicative Masterplan

RACECOURSE LANE MASTERPLAN

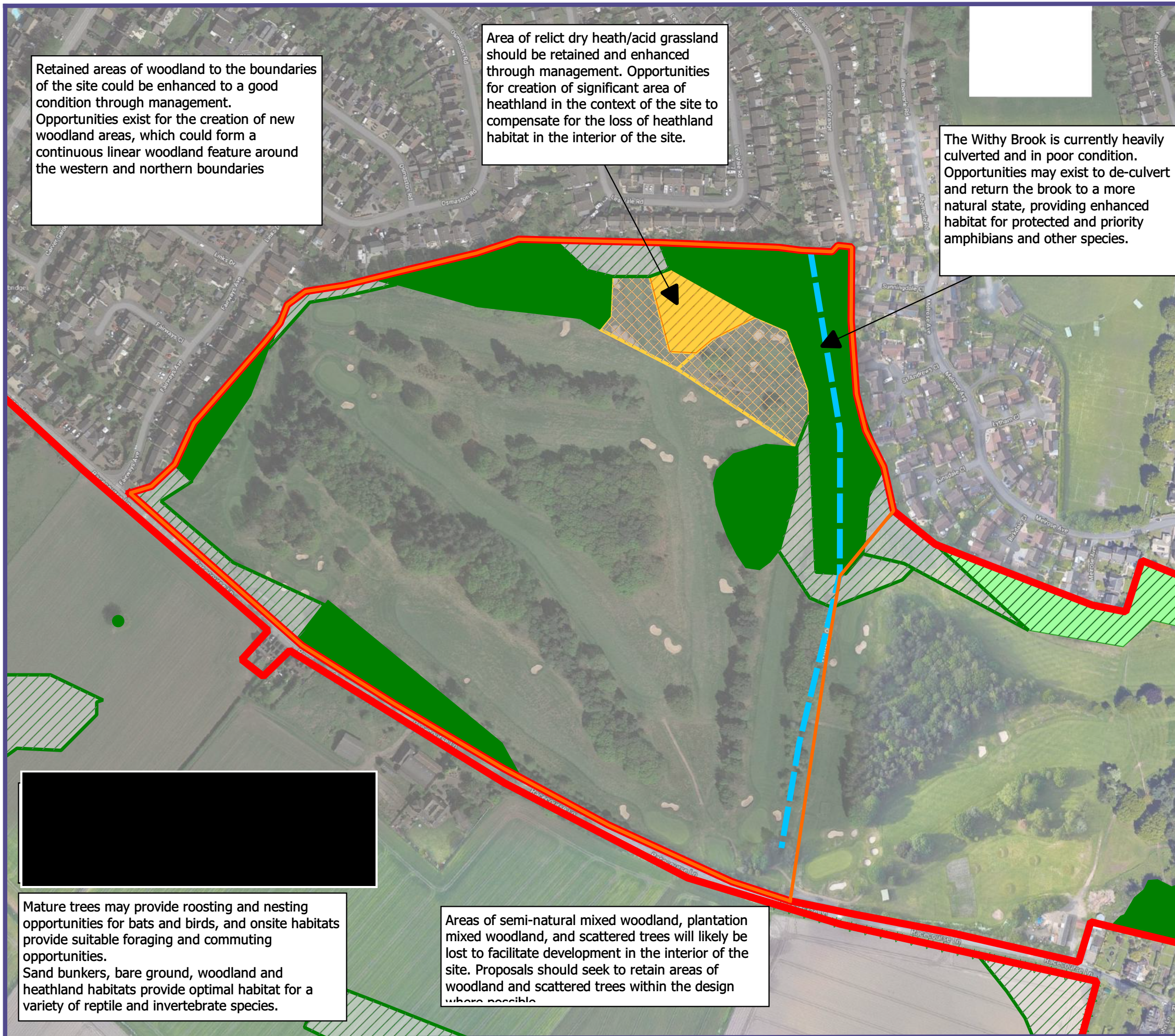


KEY

- | | | | | | |
|--|---------------|---------------------|----------------------|---------------------|-----------------------|
| Low Density Housing - Approx 15 Dwellings Per Hectare | Site Boundary | Secondary Streets | Existing Landscaping | Health Land | Existing Woodland |
| Medium Density Housing - Approx 25 Dwellings Per Hectare | Access Points | Key Pedestrian Link | New Landscaping | School Open Space | New Woodland Creation |
| High Density Housing - Approx 35 Dwellings Per Hectare | Primary Route | Public Right of Way | Public Open Space | Hardstanding/Paving | |



Plan 1 – Opportunities and Constraints Plans 13895/P01a - c



Retained areas of woodland to the boundaries of the site could be enhanced to a good condition through management. Opportunities exist for the creation of new woodland areas, which could form a continuous linear woodland feature around the western and northern boundaries

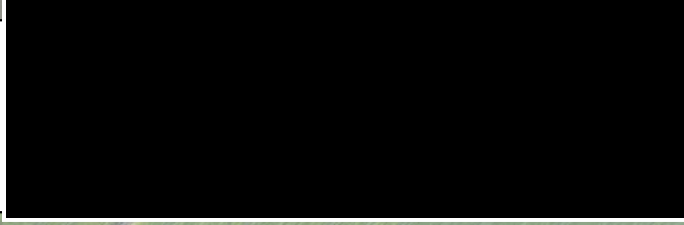
Area of relict dry heath/acid grassland should be retained and enhanced through management. Opportunities for creation of significant area of heathland in the context of the site to compensate for the loss of heathland habitat in the interior of the site.

The Wither Brook is currently heavily culverted and in poor condition. Opportunities may exist to de-culvert and return the brook to a more natural state, providing enhanced habitat for protected and priority amphibians and other species.

- Site Boundary (Red Line)
- SINC Boundary
- Relict Dry Heath Acid Grass Mosaic
- Plantation Mixed Woodland
- Semi-natural Mixed Woodland
- Potential Heathland Creation
- Potential Woodland Creation
- Wither Brook

A sensitive lighting design should be incorporated to provide 'dark corridors' along the retained woodland and new green infrastructure, in order to minimise the impacts to foraging and commuting bats and other nocturnal wildlife.

New green infrastructure should be designed to provide an ecological network through the wider site, linking retained habitats of ecological importance. Habitat creation and enhancement could include heathland, woodland, species rich grassland, species rich hedgerows, trees and multifunctional attenuation/SuDS, which should seek to more than mitigate impacts to result in a net biodiversity gain, in line with NPPF 2019.



Mature trees may provide roosting and nesting opportunities for bats and birds, and onsite habitats provide suitable foraging and commuting opportunities. Sand bunkers, bare ground, woodland and heathland habitats provide optimal habitat for a variety of reptile and invertebrate species.

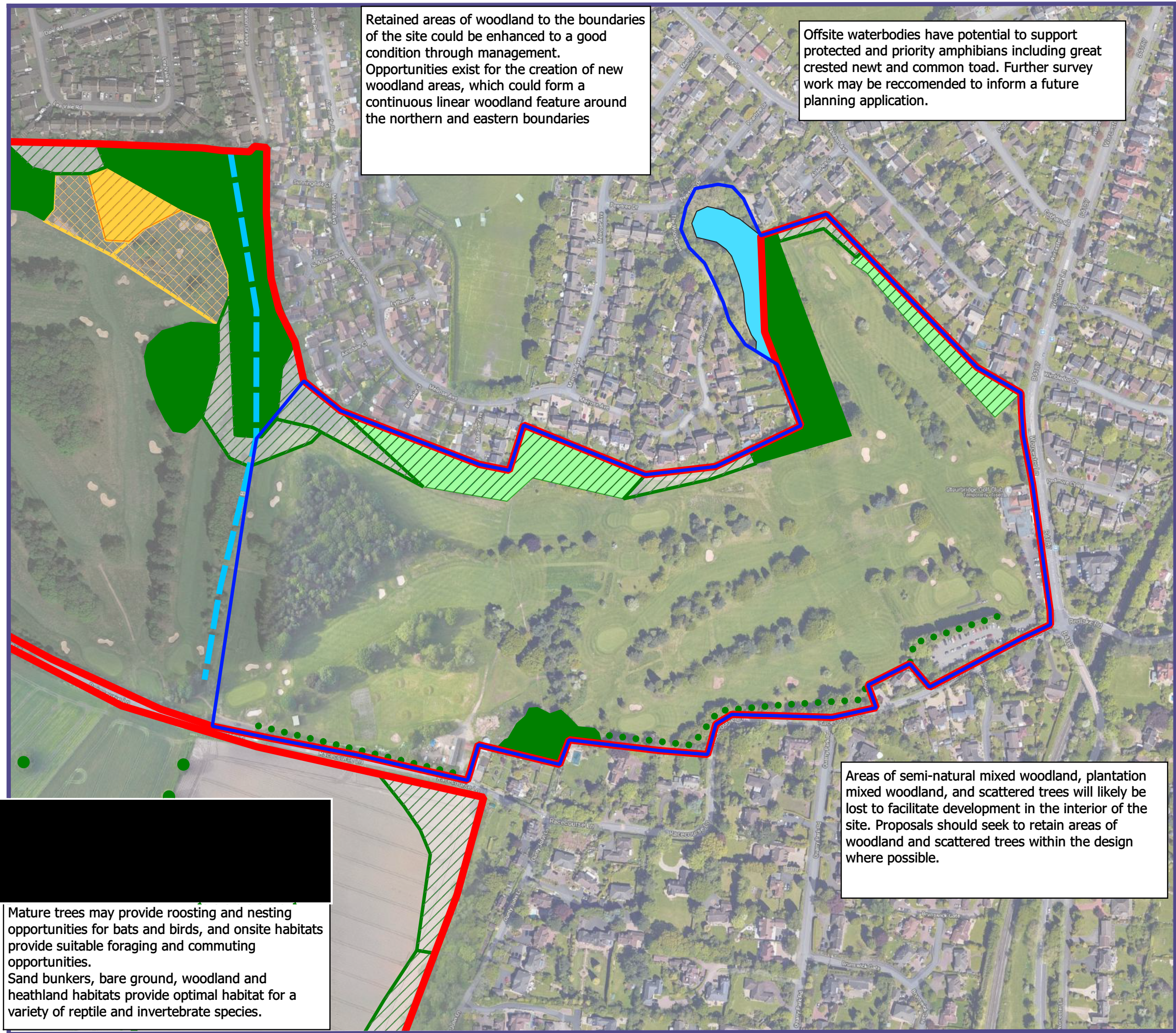
Areas of semi-natural mixed woodland, plantation mixed woodland, and scattered trees will likely be lost to facilitate development in the interior of the site. Proposals should seek to retain areas of woodland and scattered trees within the design where possible.



Project	Stourbridge Golf Course - SINC
Drawing Title	Opportunities and Constraints
Scale	As Shown (Approximate)
Drawing No.	13895/P01a
Date	March 2021
Checked	CA/AG



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Retained areas of woodland to the boundaries of the site could be enhanced to a good condition through management. Opportunities exist for the creation of new woodland areas, which could form a continuous linear woodland feature around the northern and eastern boundaries

Offsite waterbodies have potential to support protected and priority amphibians including great crested newt and common toad. Further survey work may be recommended to inform a future planning application.

Areas of semi-natural mixed woodland, plantation mixed woodland, and scattered trees will likely be lost to facilitate development in the interior of the site. Proposals should seek to retain areas of woodland and scattered trees within the design where possible.

Mature trees may provide roosting and nesting opportunities for bats and birds, and onsite habitats provide suitable foraging and commuting opportunities. Sand bunkers, bare ground, woodland and heathland habitats provide optimal habitat for a variety of reptile and invertebrate species.

-  Site Boundary (Red Line)
-  SLINC Boundary
-  Heathland Creation
-  Plantation Woodland
-  Relict Dry Heath Acid Grass Mosaic
-  Semi Natural Woodland
-  Woodland Creation
-  Offsite Waterbody
-  Tree Line
-  Withy Brook

A sensitive lighting design should be incorporated to provide 'dark corridors' along the retained woodland and new green infrastructure, in order to minimise the impacts to foraging and commuting bats and other nocturnal wildlife.

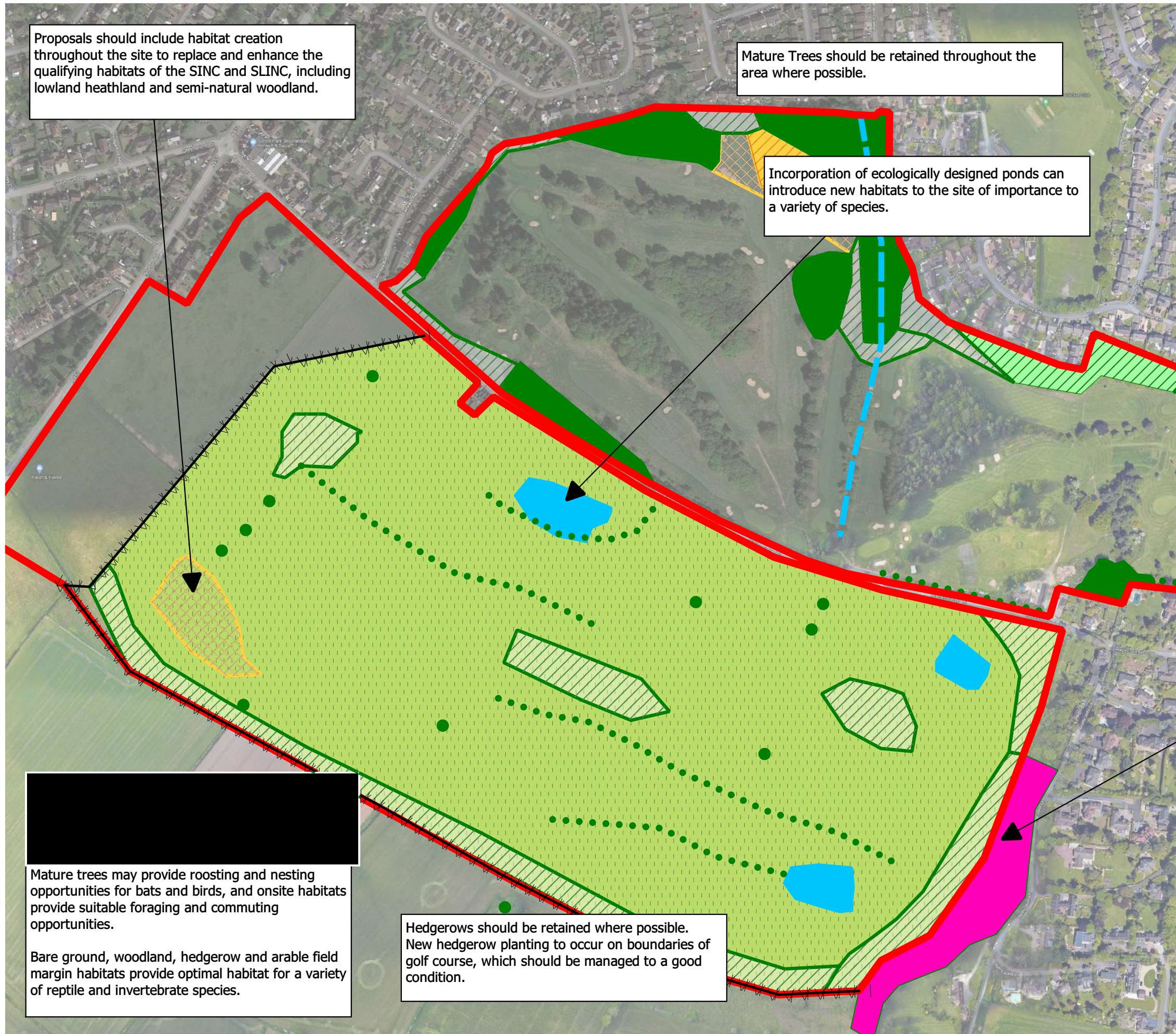
New green infrastructure should be designed to provide an ecological network through the wider site, linking retained habitats of ecological importance. Habitat creation and enhancement could include heathland, woodland, species rich grassland, species rich hedgerows, trees and multifunctional attenuation/SuDS, which should seek to more than mitigate impacts to result in a net biodiversity gain, in line with NPPF 2019.



Project	Stourbridge Golf Course - SLINC
Drawing Title	Opportunities and Constraints
Scale	As Shown (Approximate)
Drawing No.	13895/P01b
Date	March 2021
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Proposals should include habitat creation throughout the site to replace and enhance the qualifying habitats of the SINC and SLINC, including lowland heathland and semi-natural woodland.

Mature Trees should be retained throughout the area where possible.

Incorporation of ecologically designed ponds can introduce new habitats to the site of importance to a variety of species.

Mature trees may provide roosting and nesting opportunities for bats and birds, and onsite habitats provide suitable foraging and commuting opportunities.

Bare ground, woodland, hedgerow and arable field margin habitats provide optimal habitat for a variety of reptile and invertebrate species.

Hedgerows should be retained where possible. New hedgerow planting to occur on boundaries of golf course, which should be managed to a good condition.

-  Site Boundary (Red Line)
-  Heathland Creation
-  Semi Natural Woodland
-  Woodland Creation
-  Offsite Ounty John SINC
-  Pond
-  Hedgerow Creation
-  Tree Line/ Scattered Trees Planting
-  Retained Mature Trees
-  Indicative Golf Course Area

Note: Golf Course Features Are Purely Illustrative.

The new golf course area should incorporate green infrastructure and habitat creation designed to provide an ecological network throughout the wider site, linking locally designated sites, priority habitats and other important ecological features both on and offsite. Habitat creation and enhancement could include woodland, heathland, species rich grassland, species rich hedgerows, trees and multifunctional flood attenuation/SuDS, which should seek to more than mitigate impacts to result in a net biodiversity gain, in line with NPPF 2019.

The offsite woodland SINC can be expanded and enhanced through supplementary woodland planting within the proposed new golf course area.



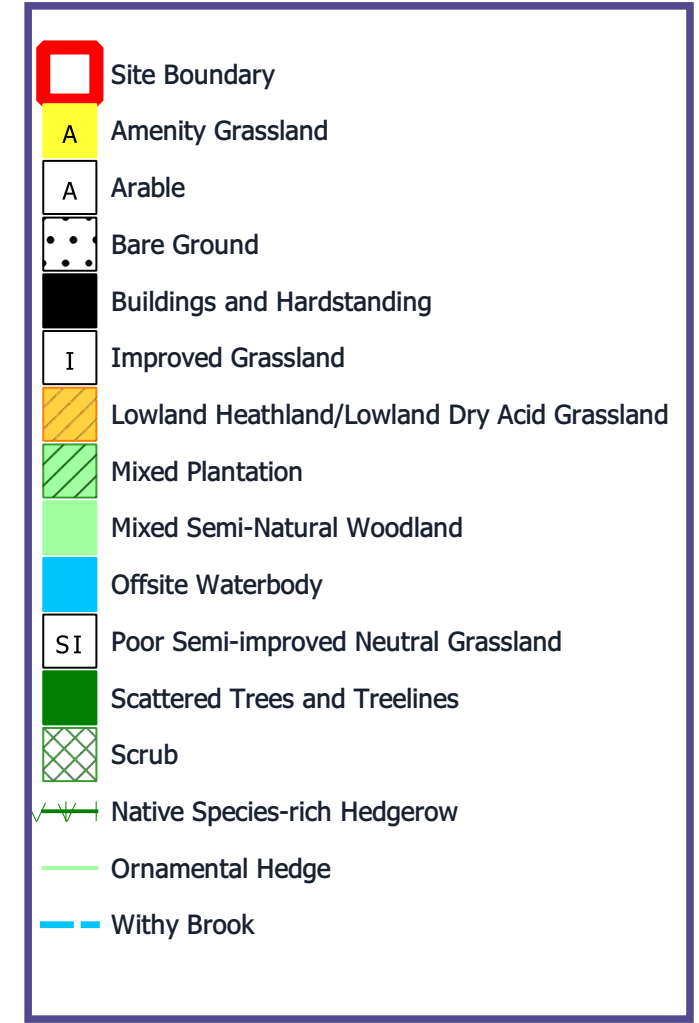
Project	Stourbridge Golf Course - New Golf Course
Drawing Title	Opportunities and Constraints
Scale	As Shown (Approximate)
Drawing No.	13895/P01c
Date	March 2021
Checked	CA/AG



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Plan 2 – Habitat Features Plan 13895/P02



Project Stourbridge Golf Course
Drawing Title Habitat Features Plan
Scale As Shown (Approximate)
Drawing No. 13895/P02
Date March 2020
Checked CA/AG



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