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**Subject:** Consultation comments on the local plan  
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Strategic Planning Team,

National Planning Policy requires that the council local plan is prepared with consideration to sustainable development which means that there is a need to consider the natural environment and specifically the ecology of the local area. In addition development should not take place on greenbelt sites.

I consider that the plan that was approved by councillors recently has not been prepared in accordance with sustainable development and that it does not take into consideration the local ecology of the area.

This is illustrated with particular reference to Site 582. This site lies adjacent to Wolverhampton and specifically forms part of an important ecological network with Wolverhampton and the surrounding countryside. Thus the adjacent Smestow Valley Local Nature Reserve adjoins this site at Bhylls Lane and the South Staffordshire Railway Walk extends from the LNR along the edge of Site 582 into the countryside around Lower Penn and Wombourne. The Smestow Valley area is particularly good habitat for local bats and the Birmingham and Black Country Bat Group (Brum Bats) have found 11 species of bats in this area recently. Bats commute in and out of the area along green corridors such as the railway walk and hedgerows of which there are a good number of species-rich ones on this site. Thus this important area is vital for the preservation of local bats which are protected both nationally and at European level by environmental legislation.

Site 582 also has records for lapwing (*Vanellus vanellus*) a red listed species in the UK which is also protected by national and European legislation.

National Planning Policy Framework is required to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. The Local Plan for South Staffordshire does not do this adequately.

Your sincerely  
Dr Lynn Besenyeyi