



**National
Trust**

Dudley Local Plan,
Planning Policy,
Planning & Regeneration,
Council House,
Priory Road,
Dudley,
DY1 1HF

By email only.

Dear Mr Mellor,

Draft Dudley Local Plan - Draft Plan Regulation 18 Consultation

The National Trust is a charity founded in 1895 to promote the permanent preservation of places of historic interest and natural beauty for the benefit of the nation. With over 5 million members we are the largest conservation charity in Europe.

The National Trust owns, cares for and provides public access to 179 hectares of land at the Clent Hills, on the edge of Dudley Borough's boundary. This land was given to the Trust by a number of individuals, trusts and local authorities with further financial support being given by the Countryside Commission and twenty local authorities. The Clent Hills are a countryside haven with miles of footpaths, bridleways and easy access trails. They have long been popular with local visitors and provide exceptional views across the countryside and the conurbation, with a topograph at Clent Hill describing the view. Clent Hills comprise important ecological habitats typified by lowland acid grassland heath and is home to many birds and insects.

The National Trust are developing proposals for the creation of 8 Hills Regional Park, a c. 50 square mile regional park which aims to enhance and prioritise the landscape in the south of the West Midlands conurbation, whilst increasing people's access to it and boosting its biodiversity and ecological connectivity. The National Trust is not proposing ownership of this area, but rather is looking to work with partners to shape the policy framework and incentivise existing landowners to amend management in line with the aims of the Regional Park.

As the proposals for the 8 Hills Regional Park have evolved, we have identified an opportunity for the 8 Hills boundary to be extended into Dudley Borough, in the areas to the west of the

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M5 and south of Manor Way (A456), and to the east of Wollescote, which are understood to form part of the West Midlands Green Belt. The Natural England Green Infrastructure Framework identifies the corridor of the M5 as a major barrier affecting Accessible Green Space (AGS) buffers. The extension of the regional park into land bordering the A456 and the M5 is proposed to offer an opportunity to improve connectivity at the settlement edge. In terms of the land to the east of Wollescote, the inclusion of this land could enhance recreational opportunities close to where people live and promote enhanced connectivity across the PRow network. This approach could be used as a mechanism to address open space deficiencies in this built-up area of Dudley. We have enclosed the 8 Hills boundary proposal for your information and would be delighted to discuss further with relevant policy officers in due course, including sharing our draft Spatial Framework.

We therefore have reviewed Dudley's draft Local Plan and set out our comments to relevant policies within this letter. We have also indicated throughout our representations how 8 Hills Regional Park could contribute to the achievement of Dudley's vision and why it would be beneficial to identify 8 Hills Regional Park within the Local Plan as a vehicle to deliver Green Infrastructure objectives for the benefit and wellbeing of the people of Dudley and beyond.

Spatial Vision and Strategic Priorities

The National Trust supports the Vision for Dudley Borough, particularly in respect of the objectives to have a network of high-quality parks, green spaces, waterways, and nature reserves; and a high quality and beautiful natural, built and historic environment that respects and enhances local character and distinctiveness. It is considered that both of these objectives will significantly contribute to the enhancement of wellbeing for local residents and climate change adaptation and resilience.

We are supportive of the Strategic Priorities that have been identified, and we consider that the 8 Hills Regional Park could achieve a great deal in respect of Strategic Priority 1: Addressing the Climate and Ecological Emergency, Strategic Priority 2: Protecting and enhancing the natural and historic environment and support an increase in biodiversity and ecological networks, Strategic Priority 5: Creating well designed and beautiful places, promoting the health and social wellbeing of communities by: improving access to high quality open spaces and sport and recreation facilities, to help support healthy lifestyles.

The proposed section of 8 Hills Regional Park located in the south east of Dudley Borough would connect into the wider Regional Park extending east to west from Dudley, Bromsgrove and Birmingham, in the southern area of the West Midlands conurbation where there is considerable recreation pressure on the green spaces in the area.

Policy DLP6 Infrastructure Provision

We are supportive of the proposed approach towards infrastructure provision, including planning contributions required towards local infrastructure improvements necessary to mitigate the impact of development on the local area. We welcome the inclusion of publicly accessible open space in the definition of infrastructure as set out in paragraph 6.20.

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We note that paragraph 6.24 acknowledges that “Where the combined impact of several developments creates the need for infrastructure, it may be necessary for developer contributions to be pooled to allow the infrastructure to be secured in a fair and equitable way. Pooling may take place both between developments and also between Dudley and other local authorities where there is a cross-authority impact.” We consider that this is a sensible approach to take towards given the housing pressure in the West Midlands conurbation and the related pressure that will negatively impact on green infrastructure and open spaces.

Where new development is supported, we would expect that contributions towards open space and green infrastructure should be prioritised on the basis that access to open space is essential to the health and wellbeing of residents. The 8 Hills Regional Park could contribute significantly towards the access that residents have to open spaces within Dudley and nearby. Where the Regional Park could fulfil this need in Dudley, we would welcome the opportunity to be included within the Infrastructure Funding Plan so that the benefits that 8 Hills could deliver are enhanced and maintained for long term access.

Policy DLP8 Health and Wellbeing

We welcome the acknowledgement that the Dudley Local Plan makes in respect of the impact of climate change on health and wellbeing in paragraph 7.4. It is our view that well resourced green infrastructure and publicly accessible open space could have a significantly positive impact on health and wellbeing, and this is part of our motivation in promoting the concept of the 8 Hills Regional Park.

We are supportive of the wording of policy DLP8, especially the need for mitigation or compensation for developments which would be likely to have a negative impact on health and wellbeing through planning conditions and/or financial/other contributions secured through planning obligations. Whilst it is not explicitly specified where such a financial contribution would be directed, given the benefits that publicly accessible open space can have towards health and wellbeing, we would expect that a proportion of the contributions go to the enhancement and maintenance of green infrastructure.

Policy DLP31 Nature Conservation

We are supportive of the policy approach towards Nature Conservation and consider that there are likely opportunities to enhance and restore nature and ecological habitats through the development management process. We support the inclusion of part 3 of policy DLP31 which states that “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.” Compensation in the exceptional circumstances should be administered through the Infrastructure Funding Statement, and we would consider that land identified as being part of the 8 Hills Regional Park within Dudley would be an appropriate recipient of mitigation or compensation.

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As set out in paragraph 11.10 of the Local Plan, "...the borough can play an important role in helping species migrate and adapt to climate change as their existing habitats are rendered unsuitable. It is therefore very important to increase the ability of landscapes and their ecosystems to adapt in response to changes in the climate by increasing the range, extent, and connectivity of habitats." The 8 Hills Regional Park seeks to address this risk caused by climate change. It is considered that the designation and acknowledgement of 8 Hills Regional Park by Dudley Borough Council could address and support the Council in achieving a number of the nature conservation related objectives set out within the draft Local Plan.

Policy DLP32 for BNG and nature recovery

The National Trust is engaged in Local Nature Recovery Strategies and would be keen to discuss how National Trust land and initiatives, such as 8 Hills Regional Park, could contribute towards achieving the objectives of BNG and nature recovery.

We support the principles of Policy DLP32. Land within the regional park may represent the opportunity to secure off site BNG, contributing towards nature recovery and connectivity within the regional park. This could see benefits two-fold, in respect of improvement to publicly accessible open space and nature recovery of existing habitats.

Policy DLP33 Provision, retention and protection of trees, woodlands, Ancient Woodland, and Veteran trees

We are supportive of policy DLP33 and are encouraged that so much focus has been placed on trees and the benefits that they can deliver for habitat creation, air quality management, public amenity and climate cooling. Enhancement and connectivity of the woodland network will be a priority of the regional park.

Policy DLP37 Open Space and Recreation

The National Trust looks after some of the most beloved open spaces in the country and is excited by the contribution that the 8 Hills Regional Park can make towards Dudley's ambitions set out in paragraph 11.68 which state that open space should "deliver opportunities for safe, attractive, functional, linked, and accessible green spaces for people to exercise and play sport in and enjoy. These areas also promote the enhancement of the natural environment to support greater biodiversity, maximises benefits for health and well-being, helps to mitigate and adapt to climate change...". We would recommend that the opportunity for residents to connect to nature should be included in this paragraph.

It is anticipated that the 8 Hills Regional Park within and on the edge of Dudley will provide open space that may be the nearest open space to existing and new residents of the Borough, and we concur with the approach set out in paragraph 11.71 which sets out that "it is important that open space and sports facilities, and places that people visit every day such as shops and schools, are located and designed so that people are encouraged to walk or cycle to them from their homes". We have purposefully identified land to the south of the A456 and east of
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Wollescote for inclusion within the 8 Hills Regional Park boundary on the basis that improving access to greenspace in these locations would yield best access for existing communities that might not have adequate access to open space currently.

Whilst the 8 Hills Regional Park would not seek to create new open space, its intention is to improve access to existing spaces, as part of a wider partnership with member organisations, which could include Local Authorities such as Dudley Borough Council. This increased and improved access across open space that would link into a Regional Park would comply with the justification for the policy set out in paragraph 11.73, particularly in terms of the creation of “Greenways”, especially when considering the focus of our efforts to provide attractive and safe off-road links for active travel along wildlife corridors. We are in agreement that the restoration of towpaths, bridges, public rights of way and the creation of cycle and pedestrian links to enhance the greenway network should be high priority and this is what we will be seeking to achieve throughout the regional park, including the area in southeast Dudley. We are supportive of the approach that such enhancement will be sought through planning conditions and obligations.

We are supportive of the wording of policy DLP37 and consider that the 8 Hills Regional Park can go some way towards prioritising the existing green network for recreation and biodiversity and taking opportunities to strengthen and expand the network; significantly expanding community use of open space and recreation facilities; and providing opportunities to increase accessible public open space and suitable recreational use of the Green Belt. We are particularly supportive of the inclusion of the objective to make more efficient use of land by increasing access to open space and recreation facilities for all, including people with disabilities and other target groups with limited access at present, and expect that much of the work that we do in developing the 8 Hills proposals will be focused on this element.

Policy DLP51 Dudley Borough’s Green Infrastructure Network

8 Hills Regional Park will be a vehicle to connect up the green infrastructure network throughout Dudley, Bromsgrove and Birmingham across to the Solihull border. We consider that the proposed Regional Park will accomplish the objectives set out in Policy DLP51 and the 8 Hills Regional Park could significantly strengthen this cross boundary network, whilst achieving all of the benefits and advantages for health and well being, access to public open space and climate change resilience.

We agree that the green infrastructure network should have a multi-functional role as:

- a. a wildlife corridor, to provide coherent ecological networks.
- b. accommodating pedestrian and cycle paths, particularly in linking the urban area with the Green Belt and open countryside as well as linking towns and places of employment with residential communities.
- c. providing opportunities for informal recreation.
- d. helping to form a break between locally distinct areas and centres.
- e. grazing land for horses and other livestock.

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- f. a means of maintaining the integrity of water courses across the borough as well as enhancing the natural value and restoration of water courses including de-culverting where opportunities arise.

This multi-functional role is also reflected in the aims and objectives of the delivery of the Regional Park, and the draft Spatial Framework which we have prepared illustrates how we would seek to achieve this. This document will be shared with Dudley Borough Council Officers in the new year.

Whilst we are supportive of the principles of policy DLP51 and thoroughly support the measures to maintain and enhance the green infrastructure network, **we would recommend that the 8 Hills Regional Park is referenced in this policy and designated on the Policies Map as land to the south of the A456 and land to the east of Wollescote.** We consider that this would both strengthen Dudley's green infrastructure network and present an opportunity to enter into a partnership with a governance structure for 8 Hills Regional Park and engage in a cross-boundary relationship when it comes to truly integrated green infrastructure for the benefit of people and nature across the West Midlands conurbation and beyond. The designation would align with the proposed designations on the policies map with designations of ancient woodland, areas of high historic landscape value and archaeological priority areas.

With Dudley's open spaces and existing green infrastructure under such considerable pressure in delivering housing need for the borough and potentially beyond in future, the designation of the 8 Hills Regional Park in this area of Green Belt could potentially be used to ensure that green infrastructure and open space is prioritised when considering new development and could set a high standard for connectivity and mitigation of Green Belt loss, should this be the approach that the Council would be minded to take.

Policy DLP63 Public Open Space within New Large Housing Developments

We agree that as set out in paragraph 15.1 "Recreation and Community uses provide an important part of people's health and wellbeing, as well as improving their quality of life. They also help to build inclusive communities, promote healthy lifestyles and provide green spaces for reflection and relaxation."

We are supportive of the inclusion of Policy DLP63 and consider that the requirement for new large housing development to provide on-site recreational amenity green space when in isolated, poorly served locations is essential for the health and well-being of prospective residents. We are also of the view that such on site amenity green space could form stepping stones to the 8 Hills Regional Park or potentially extend into the regional park, depending on its location. The National Trust has big ambitions for the 8 Hills Regional Park with a desire for the benefits to be as far-reaching as possible – the support for new amenity green spaces in residential development is proportionate to the contribution such could have towards the regional park and how the regional park could best serve its audience.

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Where on site amenity green space cannot be delivered, we are supportive that a financial contribution will be required towards new or improving nearby off-site public open space areas or play equipment which are well linked by means of active travel. We consider that the Regional Park would be able to deliver such requirements and as set out above would recommend that the 8 Hills Regional Park is identified in any Infrastructure Funding Statement going forward to ensure that the benefits can be secured long term for the residents of Dudley.

We hope that these representations are of assistance in your preparation of the Dudley Local Plan. We would welcome the opportunity to discuss the 8 Hills Regional Park with you in more detail in the new year and how the National Trust can support Dudley Borough in achieving its ambitions for green infrastructure and access to nature for the benefit of residents over the coming plan period.

Yours sincerely

Encs: 8 Hills boundary proposal, prepared by LUC.

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