



**National
Trust**

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

By email only.

Dear Mr Mellor

The Dudley Local Plan 2041 – Regulation 19 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 welcome this Reg 19 consultation on Dudley Borough's Local Plan.

In our previous response to Dudley Local Plan Reg 18 consultation in December 2023, we set out that 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. The proposed Regional Park boundary extends into Dudley in the areas to the west of the M5 and south of Manor Way (A456), and to the east of Wollescote, which form part of the West Midlands Green Belt.

The National Trust were delighted to find that the proposed Regional Park has been acknowledged and referenced within policy **DLP51 Dudley Borough's Green Infrastructure Network**. We support the inclusion of the Regional Park and set out further commentary which has been shared with the Planning Policy team previously below, in the interests of further justifying the inclusion.

In our previous consultation response, we commented on a number of policies, including those relating to Developer Contributions, BNG, open space and recreation. We have set out our reflections on the revised policies in the context of the proposed inclusion of the 8 Hills Regional Park within Dudley Borough's Green Infrastructure Network.

DLP6 Infrastructure Provision

We continue to be supportive of the proposed approach towards infrastructure provision and we are pleased to see that it is acknowledged that infrastructure investment will be required to support development, including public open space, as set out in paragraph 6.10.

DLP8 Health and Wellbeing

We maintain support for 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.

Environment

We are especially supportive of paragraph 11.2 which promotes the protection and improvement of the borough's biodiversity and geodiversity on the basis that this "will improve the attractiveness of the area for people to live, work, study and visit while at the same time improving the physical and natural sustainability of the conurbation in the face of climate change." Paragraph 11.4 acknowledges the importance of green infrastructure, which we thoroughly support.

DLP31 Nature Conservation

We maintain our support for the policy approach to DLP31 and consider that the inclusion of the Regional Park within the Green Infrastructure Network can support the achievement of many of the indicators set out within the policy wording and supporting justification.

DLP32 Nature Recovery Network and Biodiversity Net Gain

We are supportive of the revised approach to this policy whereby all development is required to deliver the objectives of the LNRS through the BNG requirements.

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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 are supportive of the requirement for all development to deliver a minimum of 10% net gain in biodiversity value.

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

We remain supportive of policy DLP33 and consider that in the context of the National Trust's recent development of a bid for a woodland creation project in the wider area, there are likely to be many opportunities where the National Trust can contribute to and support the ambition of Dudley Borough.

DLP35 Geodiversity and the Black Country UNESCO Global Geopark

Whilst we have not previously commented on this policy, we have identified in our discussions with the Dudley Policy team and further research on the Regional Park in Dudley, that there is likely to be a number of opportunities within the Regional Park area where the cultural heritage significance of the Global Geopark can be enhanced and communicated.

We are supportive of the principles of the policy and would be keen to explore where this is relevant within the Regional Park and how it can be best communicated.

DLP37 Open Space and Recreation

We maintain support for this policy and consider that our comments set out in our previous representations to the Reg 18 Local Plan consultation are still applicable to the policy in respect of how the Regional Park can contribute towards the achievement of the objectives set out in this policy.

DLP49 Green Belt

Whilst we have not previously commented on this policy, as the Regional Park land is also designated Green Belt within Dudley, we felt it necessary to respond to the policy wording.

We consider that the 8 Hills Regional Park concept represents significant opportunity to enhance Dudley's Green Belt policy on the basis that any designation of the regional park whereby any speculative or planned development within the regional park area would not only have to meet the multiple Green Belt tests and potentially demonstrate Very Special Circumstances, but would also have to adhere to the Green Infrastructure principles that would form the foundation of the regional park in its delivery. As set out in the comments to policy DLP51, the regional park would better enable Local Planning Authorities to hold developers to account to ensure that any residential schemes that may be brought forward are of the highest quality, exceed the minimum green infrastructure criteria and contribute to the regional park which could also ensure that new residential schemes are more cohesive when being considered in their local context. Additionally, given the layers of considerations that would be required to support development within the regional park area, this would ensure that poor quality developments are not accepted on the basis of only their contribution to

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housing numbers. We are of the view that designating the regional park as part of Dudley's Green Infrastructure network could tangibly strengthen the Green Belt policy set out.

It is proposed that, building on the concept set out within the Spatial Framework, and the successful inclusion of the regional park within relevant Local Plans, that a regional SPD or some supporting policy could be developed to support the delivery of the regional park, which would add further detail to the expectations of any planned or speculative development within the Green Belt and regional park.

We are supportive of the policy wording in respect of the ambition to maintain the Green Belt to "provide easy access to the countryside where the landscape, visual amenity, nature conservation and outdoor sport and recreation value of the land will be protected and enhanced".

DLP51 Dudley Borough's Green Infrastructure Network

We are supportive of the wording of policy DLP51, and are especially supportive of the reference to the Regional Park in paragraph 13.18.

As set out earlier in this letter, we wanted to provide the following rationale and further justification for the inclusion of the Regional Park within this policy. It is our view that the designation of the regional park and inclusion within the associated Green Infrastructure policy by Dudley MBC would reinforce proposed policies within the Local Plan, including DLP55 Historic Character and Local Distinctiveness of Dudley and DLP60 Areas of High Historic Landscape Value on the grounds that the purpose of the regional park would be to improve access to open space for the public, and enable nature recovery and enhancement. Furthermore, the regional park designation presents the opportunity to enhance Green Belt policy in the context of the emerging, revised NPPF and require any development that is proposed in the vicinity of or within the regional park to deliver meaningful, high quality green infrastructure to connect with the existing network.

With regards to specific features in Dudley that could be highlighted as significant within the regional park, I have identified that there is number of existing heritage designations in the area that could be further preserved and enhanced by their position within the regional park.

Wychbury Hill is geographically and historically one of the Clent Hills, being part of the wider hill range so a clear link to the established geography being presented as part of the regional park. It is also a significant geosite within the Black Country, which has its own draw of visitors. Wychbury Hill would be most westerly point in the regional park and would make sense as a visitor gateway to the regional park – various sources of funding could be explored to establish this.

Notable features at Wychbury Hill include Wychbury Hill obelisk – grade II* listed structure, previously at risk and rebuilt and restored in 2011 – visible from peaks in Malvern and Shropshire – links to Lickey Monument (also an obelisk). Wychbury Hill also contains Wychbury Ring, an iron age hill fort. Small bronze rings, including an Iron Age terret, were

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found in the fort in 1884, and Roman coins and masonry have been found nearby, suggesting a possible site of a later Roman Villa.

It is noted that there are scheduled ancient monuments in the area – St Mary’s Abbey and associated earthworks, Halesowen Abbey. The designation of the regional park could highlight and bring attention to these important heritage assets and the identified Area of High Historic Landscape Value - contains the site of Manor Colliery, Lapal Canal and Tunnel.

It is understood that areas of Ancient Woodland are found in the area of the proposed regional park to be covered by Dudley, and given the National Trust’s recent success to develop a bid for a woodland creation opportunity, these areas could be preserved and enhanced by other woodland creation, as well as funding opportunities for other woodland enhancement and creation elsewhere in the regional park.

There are a number of Sites of Importance for Nature Conservation (SINC) in the area identified which again could be enhanced by their inclusion within a designated regional park, providing the opportunity to improve preservation of these special places and improve educational opportunities for visitors to the area, through the provision of signage which is likely to be delivered throughout the regional park.

As set out in our previous consultation response, we would recommend that the Regional Park is designated on the Policies Map. We do note however that the proposed Green Infrastructure Network specifically includes the Dudley portion of the West Midlands Green Belt, and this is indicated on the Policies Map. We do however consider that further reference to the Regional Park would further strengthen the opportunities that can be identified to support the Green Infrastructure network in Dudley and more widely across the West Midlands through the Regional Park.

DLP55 Historic Character and Local Distinctiveness of Dudley

As set out above, it is considered that the designation of the Regional Park can reinforce and support this policy in respect of the enhancement opportunities that could be brought forwards for archaeological features and historic character within the Regional Park area.

We are supportive of this policy, particularly in respect of the preservation and enhancement required in “Areas of High Historic Landscape Value (AHHLV) that demonstrate concentrations of important wider landscape elements of the historic environment, such as areas of open space, woodland, watercourses, hedgerows, and archaeological features, that contribute to local character and distinctiveness” and “Archaeological Priority Areas”, both of which are found within the Regional Park area.

DLP60 Areas of High Historic Landscape Value (AHHLV)

As set out above, whilst we have not previously commented on this policy, we have identified in our further research on the land proposed to be encompassed in the Regional Park area within Dudley that this is identified almost entirely as an AHHLV, alongside several other designations.

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We are supportive of this policy and consider that the Regional Park can present opportunities to enhance this AHHLV. This area is crossed by many public rights of way and we would encourage the enhancement and connectivity of these public rights of way, subject to ensuring that these would not have a detrimental impact on the character of the AHHLV.

DLP62 Heritage Assets of archaeological interest, Scheduled Monuments and Archaeological Priority Areas (APA)

As the area identified to be included within the Dudley portion of the Regional Park is designated as an APA, we felt it necessary to consider the content of this policy. We support this policy, particularly in respect of a presumption against any development which would threaten the integrity, significance or prejudice the setting of Scheduled Monuments and non-scheduled sites of national importance. This is on the basis that we consider that the designation of the APA enhances the amenity value of the Regional Park and improved access will deliver significant public benefits.

DLP63 Public Open Space within New Large Housing Developments

We maintain support for this policy and consider that our comments set out in our previous representations to the Reg 18 Local Plan consultation are still applicable to the policy in respect of how the Regional Park can contribute towards the achievement of the objectives set out in this policy.

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

Claudia Clemente-Benfield MRTPI
Planning Adviser

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