

**Summary of Consultations received to Dudley Council's Draft Parks and Green Space Strategy (PPG17 Audit) document (February 2009) and the Council's responses to the Consultations.**

Organisation name:	Summary of comments from respondent:	Council's Response:	Council's further action:
<p><b>Issue .1.</b></p> <p>Forestry Commission (supporting representation)</p>	<p>The respondent welcomes reference to urban trees and woodlands within the draft Parks and Green Space Strategy and the benefits that urban trees provide as part of the wider green space network.</p> <p>Respondent considers that the draft Strategy could be made clearer by concentrating on a few key messages or 'killer facts' in the main body of the document. Need to summarise the evidence heavily and put detail in appendices or a technical annex. Provide a short non-technical summary.</p> <p>There is no recognition of the link to renewable energy and biomass in particular. Trees and woods can contribute to climate change adaptation by contributing to resilient habitats/networks and climate</p>	<p>Comments noted and welcomed.</p> <p>Accept. The Council proposes to provide a new non-technical and short summary document which will set out the purpose and content of the Parks and Green Space Strategy, and summarise the main key findings which emerged from the Strategy. This will be non-technical and short to make it easy to understand.</p> <p>Reference to biomass and renewable energy and production of low carbon fuel would be outside the remit of the Parks and Green Space</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document (see below)</p> <p>Re-title the existing 177 page Parks and Green Space Strategy document with the following new title: "Dudley Council Parks and Green Space Strategy Technical Document – Information supporting Dudley's Parks and Green Space Strategy (PPG17 Audit)."</p>

	<p>change mitigation through using their biomass – this is set out in the Government’s England Woodfuel Strategy.</p> <p>Huge opportunity to link the ongoing management of green space, particularly trees and woods, with production of a valuable local low carbon fuel to feed local biomass boiler installations and reduce the borough’s carbon footprint, whilst enhancing green space and providing jobs.</p> <p>The Policy Context Chapter could make reference to Planning Policy Statement 22 (PPS22) (2004) “<i>Renewable Energy</i>”.</p> <p>West Midlands Regional Spatial Strategy (WMRSS) Policy QE8 forestry and woodland policy, specifically reference to promoting urban and community forestry, including development of Black Country Urban Forest</p>	<p>Strategy document. The purpose of the Strategy in line with national planning guidance set out in Planning Policy Guidance Note 17 (PPG17) (2002) “<i>Planning for Open Space, Sport and Recreation</i>” is to examine the quantity, quality, accessibility and distribution of the Borough’s Parks and other green spaces.</p> <p>Comments noted.</p> <p>Comments noted in relation to national planning guidance PPS22 (2004). However, the Council considers that it is not necessary to make reference to PPS22 within the Policy Context Chapter of the draft Strategy as the purpose of the draft Parks and Green Space Strategy is to concentrate and focus on open space quantity,</p>	
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	<p>(BCUF) supports this strategy – should include in Regional Policy Context.</p> <p>Needs to be more reference to Black Country Urban Forest (BCUF), particularly as it was a community-facing initiative.</p> <p>Regional Forestry Framework specifically recreation and access, health and well-being, social inclusion and supporting regeneration themes supports this strategy and should be included in the Regional Policy Context.</p> <p>Dudley has the highest proportion of ancient woodland (27%, 54 hectares) of all the Black Country Authorities and this is a critical natural asset that should be protected and enhanced (Regional Spatial Strategy (RSS) Policy QE8).</p>	<p>quality, accessibility and distribution issues, not renewable energy matters. The Council considers that its proposed approach taken in the Policy Context Chapter of the draft Strategy is in accordance and compliant with national planning guidance set out in PPG17 (2002).</p> <p>Accept. Under paragraph 2.59 of the draft Strategy (under the sub heading Further Regional Guidance) include reference to the Black Country Urban Forest (BCUF) initiative.</p> <p>Comments noted.</p>	<p>After the penultimate sentence in paragraph 2.59 of the draft Strategy, include the following new additional text: “<b>The Black Country Urban Forest (BCUF) initiative.</b>”</p>
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<p><b>Issue .2.</b></p> <p>Natural England (Wolverhampton)</p>	<p>The respondent stated that the strategy provides an audit of green space within the Dudley Borough, which can inform the planning of green infrastructure.</p> <p>Respondent states that Natural England encourages the creation and improvement of new and existing accessible natural green space within a network of green spaces and natural elements that intersperse and connect cities, towns and villages.</p> <p>Respondent welcomes reference and use of the Accessible Natural Green Space Standards (ANGSt) in the Strategy. Respondent welcomes proposals to designate possible new Local Nature Reserves (LNRs).</p> <p>Paragraph 5.43 of the Draft Parks and Green Space Strategy (February 2009) gives the designated Local Nature</p>	<p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p>	<p>No change.</p>
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	<p>Reserve (LNR) as 0.90 hectares per 1,000 head of population and Dudley Borough Council acknowledge that this falls slightly short of meeting the Natural England Accessible Natural Green Space (ANGSt) Standard. When planning new development the network of green spaces, including accessible natural green space and natural elements should be factored into land values and decisions on housing densities and urban structure. To guide the planning Natural England would encourage use of the ANGSt Standards.</p> <p>In relation to paragraph 6.20 of the Draft Parks and Green Space Strategy (February 2009). The contributions that smaller natural and semi-natural green space 'local' sites make to raising the quality of people's every day living and working environments should not be</p>	<p>Comments noted and welcomed. The Council has used the Natural England Accessible Natural Green Space (ANGSt) standards to help inform and guide its draft Parks and Green Space Strategy and inform the provision of suggested new Local Open Space Standards set out in Chapter 9 (Local Open Space Standards) Table 9.14.1 of the draft Strategy.</p>	
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	<p>overlooked. Natural England encourages the improvement of such green spaces close to where people live. Individual spaces can have many functions such as providing recreational space for healthy exercise, providing a place for wildlife to live and contributing an attractive green element to the image of an area.</p> <p>Green infrastructure is the network of green spaces and natural elements (West Midlands Regional Assembly Green Infrastructure – A Prospectus for the West Midlands Region). The planning and implementation of green infrastructure should be supported by a green infrastructure strategy. The Council’s Draft Parks and Green Space Strategy (PPG17 Audit) can inform such a strategy.</p>	<p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p>	
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<p><b>Issue .3.</b></p> <p>Centro (Birmingham)</p>	<p>Respondent states that it is vital that parks and green spaces are accessible by public transport, walking and cycling. This is supported by PPG17 (2002). (Supported by PPG17 under 'Planning Objectives' under indent five).</p> <p>Also, the Government's White Paper ' A New Deal for Transport: Better for Everyone' recognises the potential benefits of cycling as a flexible, relatively cheap and environmentally friendly way to travel with important health benefits for people of all ages. Transport and in particular sustainable transport should therefore be a key theme throughout this document in order to promote accessibility to Dudley's facilities.</p> <p>Any new and existing parks, green spaces, sports, leisure and heritage assets throughout the borough should have good accessibility to the public</p>	<p>Comments noted and welcomed.</p>	<p>No change.</p>
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	<p>transport network in order to help make them more accessible by sustainable modes. This is particularly important in socially deprived areas as not only do the population have a greater need for public transport provision, they are also the people most in need of the facilities.</p> <p>The modal split set out in Figure 4.27.1 of the draft Strategy is unusual in that there are a very high percentage of walkers but not a high number of cyclists. This is possibly because local byelaws do not allow cycling in some of the parks. Therefore to encourage more sustainable means of travel to parks and green space, users should be kept informed of cycle routes to and from the facilities and secure cycle parking should be provided at the entrance to the parks. Public transport information should also be provided to encourage public</p>		
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	<p>transport use.</p> <p>Paragraph 4.52 (page 71) of the Draft Strategy states that 72% of visitors to built indoor sports facilities drive, 21% walk, 5% catch the bus and 1% cycle. Whilst it is recognised that a lot of the car trips could be down to combined trips with travel to work for example, there is still a lot of potential to increase the modal share of more sustainable methods of travel.</p> <p>Secure cycle parking should be provided outside the entrance to all built indoor sports facilities. Also, all built indoor sports facilities will have an area in the foyer where public transport timetables and cycle maps could be displayed.</p>		
<p><b>Issue .4.</b> Friends of the Leasowes</p>	<p>The respondent objects to paragraphs 10.4 (indent five) (page 168) and paragraph 10.5</p>	<p>The Council considers that the Parks and Green Space Strategy document will help to provide the sound evidence</p>	<p>Add the following additional new text <u>after</u> the penultimate sentence in paragraph 10.5 (indent 18) (page 169): “...In</p>

<p>Historic Park (Halesowen)</p>	<p>(indent 18) (page 169) (under Chapter 10) of the Council’s draft Parks and Green Space Strategy (February 2009). Paragraph 10.4 (indent five) - Using land to fund the improvement of more valued green space. And paragraph 10.5 (indent 18) – where there is a large amount (oversupply) of low quality, low use, low value green space, some of these areas could potentially be considered for other uses, such as built development which could then generate funds to help enhance and improve nearby green spaces which are of higher importance and higher value. The respondent considers that these statements are unacceptable for the following reasons:</p> <p>All green space is important in creating a favourable ambience across the borough;</p> <p>The aim should be to bring all</p>	<p>base to help ensure that sensitive and important green space areas within the Borough will continue to remain protected from inappropriate development pressures.</p> <p>In line with national planning guidance (set by central Government in London) set out in paragraphs 21, 27 (indent eight) of Planning Policy Statement 1 (PPS1) (2005) <i>“Delivering Sustainable Development”</i> and paragraphs 10 (indent 5), 36 and 40 of PPS3 (2006) <i>“Housing”</i>, the Council’s policy approach is that the priority for new development proposals (including new housing development) is previously-developed land (brownfield land) in preference to the use of <i>greenfield</i> sites for new development.</p> <p>To help clarify this issue further, the Council proposes</p>	<p><b>line with national planning guidance (in Planning Policy Statement 1 (PPS1) (2005) <i>“Delivering Sustainable Development”</i> and PPS3 (2006) <i>“Housing”</i>), the Council’s policy approach is that priority for new development proposals (including new housing development) will be on previously-developed land...”</b></p> <p>Re-adjust and delete the existing text in paragraph 10.4 (indent 5) (page 168) of the draft Strategy. Replace with the following new text:</p> <p><b>“Using green space that is more than meeting the Borough’s needs to fund the improvement of more valued green space.”</b></p> <p>Re-adjust and delete the existing text in paragraph 10.5</p>
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	<p>green space up to an acceptable standard;</p> <p>The above statements are in a Chapter which has the title 'Action Plan' and the sale of green space will therefore become an active policy that will be pursued by the Council whenever funding is needed.</p> <p>Paragraphs 10.4 (indent five) and 10.5 (indent 18) referred to above will be exploited by developers who will target areas of green space with a new confidence knowing they only need to demonstrate low quality, low use or low value, to show they are working within official guidelines.</p> <p>The sale of green space should remain as it is at present where development of such areas is resisted. The need to put forward a strong justification for development on a case-by- case basis provides</p>	<p>to re-adjust and delete existing text from paragraph 10.5 (indent 18) of the draft Parks and Green Space Strategy (February 2009) to confirm and reinforce the Council's policy approach on the need to protect important and sensitive green space areas and the Council's policy intention to focus new built development proposals to previously-developed land (e.g. urban brownfield land).</p> <p>The Council proposes to provide further clarification within paragraph 10.4 (indent 5) to help confirm the Council's policy intention to protect sensitive and important green space areas from inappropriate built development pressures.</p> <p>The Council proposes to add further references under "National Planning Policy Context" (Chapter 2) under PPS1 which reinforce the importance of using previously-</p>	<p>(indent 18) (page 169) of the draft Strategy. Replace with the following new text:</p> <p><b>“Where there is a large amount of low quality, low use, low value green space (which is not important, high value or sensitive green space) that is more than meeting the Borough’s needs, some of these areas could potentially be considered for other uses. For example, built development which could then generate funds to help sensitively and appropriately improve and enhance nearby green space areas which are important and of a high value.”</b></p> <p>Add the following additional</p>
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	<p>some restraint on the loss of these important areas.</p> <p>Leasowes Grade 1 Listed Historic Park will be harder to defend from encroachment development proposals if the Council's Draft Parks and Green Space Strategy is adopted. The same applies to most of the green space in the borough.</p> <p>The loss of even a modest area of green space is detrimental and is likely to accelerate under the draft strategy. A developer or resident who make a request to annex a small area of a park or green space may well find this is now seen as only a minor loss of open space and viewed more favourably.</p> <p>Respondent considers that paragraphs 10.4 (indent five) and 10.5 (indent 18) (on pages 168 and 169) should be deleted from the Council's</p>	<p>developed land for new development proposals.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>In relation to paragraphs 10.4 and 10.5, the Council has introduced further additional text to help clarify this issue. This matter is addressed as</p>	<p>text under "National Planning Policy Context" (Chapter 2) under Planning Policy Statement 1 (paragraph 2.8):</p> <p><b>"Under the heading "Prudent use of natural resources" in paragraph 21, PPS1 stresses that: "...The broad aim should be to ensure that outputs are maximised whilst resources are minimised (for example, by building housing at higher densities on previously developed land, rather than at lower densities on greenfield sites)..."</b></p> <p><b>Paragraph 27 (indent 8) states that: "...In preparing development plans, planning authorities should seek to: promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant</b></p>
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	<p>Draft Parks and Green Space Strategy (PPG17 Audit) and not included in the finalised adopted version of the document.</p> <p>Paragraph 1.9 (indent six) (Chapter 1) states: "...and identifying green space areas which are less important, which could be redeveloped for other uses..."</p> <p>Paragraph 2.67 (Chapter 2) states "...and identifying green space areas which are less important, which could potentially be redeveloped for other uses..." paragraphs 2.67 and 1.9 (indent six) are unacceptable and should be deleted from the Strategy for reasons stated above.</p> <p>These paragraphs will result in the sale of sensitive green space areas and increase pressures from developers. They will also result in additional levels of</p>	<p>part of the Issue .4. response above.</p>	<p><b><i>and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land.</i></b>  <b><i>..</i></b></p>
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	<p>encroachment into sensitive green space areas and Parks.</p> <p>Paragraphs 1.9 (indent six) and 2.67 do not make any reference to the use of funding generated from the sale of green space or parks to make improvements to existing areas of Parks and other green spaces.</p> <p>The statement in paragraph 10.5 (indent 9) which states: "...work closely with others to plan and develop useful green space..." needs further clarification. Respondent states that it is not clear who the "others" are intended to be, members of the Friends of the Park groups, members of the general public, developers, consultants, etc</p>	<p>Comments noted. However, in relation to the funding of green space improvements issue, the Council considers that its existing approach on this issue is already sufficiently clear within the draft Strategy. The Council does not therefore propose to modify its approach on this issue.</p> <p>Comments noted. Accept. The Council proposes to delete reference to the word "others" in paragraph 10.5 (indent 9) and re-word this sentence with new text.</p>	<p>Replace existing text in paragraph 10.5 (indent 9) and include the following new text: <b>"...Strive to achieve community/ stakeholder engagement on the development and improvement of green spaces..."</b></p>
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<p><b>Issue .5.</b></p> <p>Ian &amp; Angela Gay (Willow Brook, Halesowen)</p>	<p>Respondent considers that their private garden land should not be included in the Council's draft Parks and Green Space Strategy as it is private garden land which is not accessible to the general public for outdoor recreation. To include our garden land within the Strategy conflicts with paragraphs 1.6, 1.8, 2.4. 2.13, 2.35, and 7.7 which stress that sites should be publicly accessible for them to be included within the Parks and Green Space Strategy.</p> <p>Our garden land should not have been designated as both Green Belt land and a Site of Local Importance for Nature Conservation (SLINC) as part of the Council's Adopted Unitary Development Plan (UDP) (adopted October 2005) as it is private garden land which is not accessible to the general public. These UDP designations should be deleted.</p>	<p>The specific area of land in question at Willow Brook has not been captured as a green space site and included within Dudley Council's draft Parks and Green Space Strategy (PPG17 Audit).</p> <p>Noted, however in relation to the request to remove the Green Belt and Site of Local Importance for Nature Conservation (SLINC) Adopted Unitary Development Plan (UDP) (October 2005) designations from this land, this matter would need to be considered by Dudley Council's emerging draft Development Strategy Development Plan Document (DPD) currently being prepared as part of the Council's emerging Local Development Framework (LDF). The respondent would need to forward a representation with a clear location plan to this document. It is not the role of the draft</p>	<p>No change</p>
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		Parks and Green Space Strategy to consider this issue.	
<p><b>Issue .6.</b></p> <p>Friends and Residents of Buffery Park, Dudley.</p>	<p>The respondent states that the final bullet point in paragraph 10.4 of the draft Strategy should be amended – (e.g. using land to fund improvement of more valued green space). Respondent suggests amending paragraph 10.4 to state: “Following full consultation of key stakeholders use surplus land to fund the improvement of more valued green space.”</p> <p>Respondent suggests amending paragraph 10.5 (indent six) which currently states: “Work in partnership with other stakeholders outside the Council (such as Friends of Parks Groups) and others to enhance the borough’s Parks.” Suggest amending this sentence to state: “Work in partnership with other stakeholders outside the</p>	<p>The matter raised in this representation has already been addressed as part of the response to Issue 4 above (please refer to Issue 4 response).</p> <p>Accept suggested change. The Council proposes to amend paragraph 10.5 (indent 6)</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document.</p> <p>Amend paragraph 10.5 (indent 6) (page 168) of the draft Strategy with the following new text: <b>“Work in partnership with other stakeholders outside the Council (such as Friends of Parks Group, environmental agencies, developers, etc) to sensitively and appropriately enhance and improve the Borough’s Parks and green</b></p>

	<p>Council (such as Friends of Parks Group, environmental agencies, developers, etc) to enhance the borough’s parks and green spaces.”</p> <p>The final bullet point on page 168 (paragraph 10.5 indent eleven) which currently states: “Improve Parks and other green spaces through targeted use of developer S106 contributions to address very local problems” and first bullet point on page 170 (paragraph 10.7 (indent three)) which currently states: “Understand how various groups use the Borough Parks to use and natural green space areas and develop sympathetic schemes to accommodate different cultures” should both be deleted and replaced with the following new text:</p> <p>“Improve Parks and other green spaces through the use of developer Section 106 (s106) contributions and other</p>	<p>Accept. Delete existing text on page 168 of the draft Strategy (paragraph 10.5 indent 11) and page 170 (paragraph 10.7 indent 3). Replace with new text.</p> <p>The Council maintains its view that its proposed approach in paragraph 10.5 (indent 11) and paragraph 10.7 (indent 3) is sufficiently clear and does not therefore propose to modify its approach.</p>	<p><b>spaces.”</b></p> <p>Amend paragraphs 10.5 (indent 11) and 10.7 (indent 3) and include following new text: <b>“Improve Parks and other green spaces through the use of developer s106 contributions and other opportunities.”</b></p>
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	<p>opportunities.”</p> <p>There is no section in the draft Strategy relating to reviewing or monitoring the effectiveness of the Strategy. Respondent Suggest inserting this at the end of the Actions on points page 171.</p> <p>The draft Strategy should include an Executive Summary giving an overview of the points covered in less technical language.</p>	<p>Accept. The Strategy will be reviewed at the appropriate time to ensure that it is kept up-to-date. To help clarify this issue the Council proposes to include new additional text on page 171 of the draft Strategy which refers to reviewing the Strategy.</p> <p>A new short and non-technical Summary document will be created. This is referred to in greater detail in the Issue .1. response above.</p>	<p>Add the following new additional text on page 171 of the draft Strategy after the final bullet point in paragraph 10.9. <b>“<u>Monitoring and Review</u> The Strategy will be reviewed at the appropriate time in line with open space policies set out in the emerging Black Country Joint Core Strategy (JCS)”</b>.</p>
<p><b>Issue .7.</b></p> <p>Dudley Borough Local Access Forum (DBLAF)</p>	<p>Respondent requests that the Legal status and function of the Dudley Borough Local Access Forum (DBLAF) group is clearly defined in any report that the Council produces where reference to the Forum’s representation is made. The statutory function of the Local Access Forum is</p>	<p>The Dudley Borough Local Access Forum (DBLAF) group is already referred to in the document titled: “Statement of Consultation for Dudley Council Draft Parks and Green Space Strategy (February 2009)”. The Council proposes to add new additional text referring to the Countryside</p>	<p>Within the document titled: “Statement of Consultation for Dudley Council Draft Parks and Green Space Strategy (February 2009)” include the following new additional text adjacent to the existing text “Dudley Borough Local Access Forum (DBLAF) (Halesowen)”. Include new text: <b>“(as defined</b></p>

	<p>defined in the “Countryside and Rights of Way Act 2000”.</p> <p>Respondent considers that the six-weeks formal public consultation timescale for the draft Parks and Green Space Strategy was an insufficient consultation timescale given the length and complexity of the draft Strategy. Respondent suggests that the public consultation timescale should have been for a period of 12 weeks not 6 weeks.</p>	<p>Rights of Way Act 2000 within the Statement of Consultation document immediately adjacent to the existing text “Dudley Borough Local Access Forum (DBLAF) (Halesowen).”</p> <p>The Council considers that the 6-weeks formal public consultation stage was an appropriate timescale for the draft Parks and Green Space Strategy. The Council maintains its view that it has completed a thorough and extensive formal public consultation stage in accordance with guidelines set out in both PPG17 (2002) and, at the local-level, in accordance with the Council's Statement of Community Involvement (SCI). A list of those groups, organisations and individuals consulted can be found by referring to the document titled “Statement of Consultation for Dudley</p>	<p><b>in the Countryside Rights of Way Act 2000)”</b></p>
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		<p>Council Draft Parks and Green Space Strategy (February 2009).” This document can be viewed on the Council’s planning web-site by referring to <a href="http://www.dudley.gov.uk/planning">www.dudley.gov.uk/planning</a> then click onto “Local Development Framework” then “Parks and Green Space Strategy.”</p> <p>In addition, as already highlighted as part of the Issue .8. and 9 responses above, in order to help ensure maximum coverage for the formal public consultation stage for the draft Parks and Green Space Strategy, Council officers also provided a series of power point consultation presentations to a Friends of Parks Groups Forum meeting on Tuesday 31<sup>st</sup> March 2009, the Access in Dudley Group on Monday, 9<sup>th</sup> March 2009 and to the Dudley Borough Local Access Forum (DBLAF) Group on Monday, 16<sup>th</sup> March 2009.</p>	
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	<p>Respondent suggests that the draft Strategy would be clearer if the report had been composed of the following sections in the following order:</p>	<p>Furthermore, in addition to the late February 2009 to early April 2009 six weeks formal public consultation, as part of the early evidence gathering stage to collect base-line data, the Council has also completed a Householder Questionnaire Survey (during June 2008) of 6,500 Dudley Borough households.</p> <p>Accept. The Council proposes to create a new non-technical and short summary document. This matter is addressed in further detail as part of the Issue .1. response above. (Please refer to Issue .1. response)</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space</p>
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	<p>Contents, Introduction, Strategy and finally Appendices.</p> <p>Respondent considers that the draft Strategy introduces uncertainty for the future of Green Spaces of ½ acre or less and for other sites above and beyond the minimum standards of provision. Many areas currently enjoyed by the public will be vulnerable to development pressures for built development with subsequent losses. This is a source of concern particularly as the human population in the Borough is predicted to grow by 6%. Further losses of green space will tighten what is already a dense urban infrastructure. Rather than lose urban green space more should be provided as the population grows. This is critical if quality of life and sustainability are to be</p>	<p>In relation to concerns regarding the level of protection available to existing green space sites, the Council considers that the Parks and Green Space Strategy will help to provide further robust and credible evidence to help provide greater levels of protection to sensitive and important open space areas alongside open space policies contained in the Council's Local Development Framework (LDF).</p> <p>A cut-off point was required of green space sites of 0.2 hectares in land parcel size otherwise the draft Parks and Green Space Strategy would not have been meaningful or deliverable if the Council had assessed sites below 0.2 hectares in size so a threshold cut-off point was therefore required. This aspect is explained in more detail in paragraph 5.6 of the draft Parks and Green Space</p>	<p>Strategy document will be re-titled as a background Technical Document.</p>
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	<p>maintained.</p> <p>Respondent suggests that minimum standards of provision should not be used to identify land above that baseline figure that can be declared as an over-supply and disposed of to developers. The Council should modify its strategy accordingly to offer greater protection to current green space provision and to actually increase this in quantity rather than reduce it.</p> <p>Respondent states that the Council should not be a minimalist provider of green space but should revise its vision and aim to provide the maximum that is possible (too much cannot be provided).</p> <p>The respondent considers that the Council should therefore <u>remove</u> all references in the strategy to disposal such as, using land to (fund) the</p>	<p>Strategy (February 2009) document. Important and sensitive areas of green space sites which fall below 0.2 hectares in land parcel size will still be covered by Adopted Unitary Development Plan (UDP) (October 2005) Policy LR1 "Open Space" and by PPG17 (2002) guidance irrespective of whether they are included within the parks and Green Space Strategy document.</p> <p>In relation to concerns relating to the loss of sensitive and important green space areas due to redevelopment pressures, this matter has already been addressed as part of the response to Issue 4 above (please refer to Issue 4 response).</p>	
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	<p>improvement of more valued green space on page 168 of the draft Strategy, and existing text which refers to where there is a large amount (over supply) of low quality, low use, low value green space, some of these areas could potentially be considered for other uses. For example, built development that could generate funds to help enhance and improve nearby green spaces which are important and of high value on page 169 of the draft strategy.</p> <p>Respondent considers that public sports pitches and parks in the Dudley Borough need to be improved. Respondent considers that many of the Borough's pitches are in a substandard condition with poor drainage, poor levelling and a lack of changing facilities. To reverse the situation, the respondent suggests that the Council</p>		
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	<p>cannot rely upon windfalls or Section 106 agreements. Respondent considers that the green spaces budget needs to be incrementally increased to reverse the decline and to improve the pitches to make them available for sport.</p> <p>Focusing on a site-specific issue, the respondent suggests that the Walton Campus playing field site in Halesowen (and Wollaston playing fields off South Road, near Stourbridge) should be improved and restored so they have a beneficial outdoor sports use.</p> <p>Respondent states that the Parks and Green Spaces Strategy should encourage a linkage with Dudley Council's Rights of Way Improvement Plan which is near completion.</p>	<p>The Council's Parks and Green Space Strategy document will have a positive role to play in helping to improve public sports pitches, public rights of way networks within existing public open space areas, and other reasonable related in scale and kind green space improvements within the borough. For example, at the Development Control Planning Application stage it can act as a background for Section 106 agreements by providing the necessary information as to where new or improved open space facilities are needed. It can also be used to provide background support for open space, sport and recreation external funding applications.</p>	
<b>Issue .8.</b>	Respondent states that it is essential to keep all green	Comments noted and welcomed.	No change

<p>Lawrence Hill (Coseley) on behalf of Friends of Silver Jubilee Park, Dudley.</p>	<p>spaces for public use especially as people of all ages need more exercise. Developers need to be prevented from building on green spaces. The Council's draft Parks and Green Space Strategy will go some way to help these issues.</p> <p>Respondent considers that the draft Parks and Green Space Strategy was not given sufficient advertising as part of the March/April 2009 public consultation stage. Respondent considers that Friends of Parks groups should have been effectively consulted. The draft strategy should have been advertised in local press arenas and a press release forwarded to Friends of Parks Groups Committees.</p>	<p>In relation to concerns in relation to the public consultation completed for the draft Parks and Green Space Strategy (February 2009), this matter has already been addressed as part of the response to Issue 7 above. (Please refer to Issue 7 response).</p> <p>There was no statutory legal requirement for the Council to have to advertise the draft Parks and Green Space Strategy document in local press arenas. Matters connected to the public consultation have been addressed as part of the Issue .7. response above.</p> <p>Furthermore, in order to help ensure maximum coverage for the formal public consultation stage for the draft Parks and Green Space Strategy, Council officers provided a power point consultation presentation to</p>	
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		<p>the Friends of Parks Groups Forum meeting on the evening of Tuesday 31<sup>st</sup> March 2009. Other power point presentations were also held for other key stakeholders. This aspect is addressed further in the Issue .7. response above.</p>	
<p><b>Issue .9.</b></p> <p>Respondent on behalf of Friends of Parks Network.</p>	<p>Respondent has concerns in relation to paragraph 1.7 (table 1.7.1) on page 2 of the draft strategy. Concerns over the different typologies for Parks and Public Spaces.</p> <p>Respondent considers that the types of open space referred to in table 1.7.1 are not the same as those referred to in the Council's Adopted Unitary Development Plan (UDP) (adopted October 2005) and former superseded UDP (1993).</p> <p>Respondent has concerns that parks may be downgraded in the strategy (e.g. Changed to</p>	<p>In relation to paragraph 1.7 (table 1.7.1) of the draft Parks and Green Space Strategy (February 2009), the Council maintains its view that its approach on this issue is supported and is in accordance with national planning guidance set out in PPG17 (2002) and Best Practice. The Council doe not therefore propose to make any changes in relation to this issue.</p> <p>In relation to the concerns relating to potential selling off open space areas and green space redevelopment pressures, this matter has</p>	

	<p>another type of open space such as amenity green space) and then these green space areas will be sold off and redeveloped.</p> <p>Respondent states that there is an under provision of open space for young people can extra funding be identified through Landfill Tax.</p> <p>Respondent has concerns regarding how Section 106 monies are allocated from new development proposals and the fact that S106 monies are only allocated to sites near a development.</p> <p>Respondent has concerns regarding the potential for inappropriate developments to be erected in the Borough's Parks as a result of the Healthy Towns Program.</p> <p>Respondent states that Friends of Parks Groups need to be consulted as part of the</p>	<p>already been addressed as part of the response to Issue 4 above. (Please refer to Issue 4 response).</p> <p>The Parks and Green Space Strategy will have a positive role to play as it can be used to provide background support for open space, sport and recreation external funding applications.</p> <p>At the Development Control Planning Application stage, Section 106 (S106) monies are allocated in accordance with clear policy tests set out in national planning guidance in Circular 05/2005 "<i>Planning Obligations</i>". For example, the Council will only seek Section 106 monies where the planning obligation is: relevant to planning; necessary to make the proposed development acceptable in planning terms; directly related in scale and kind to the proposed development; and reasonable</p>	
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	<p>Healthy Towns Program proposals.</p> <p>Respondent considers that the formal public consultation stage completed for the draft Parks and Green Space Strategy has not been extensive enough. Respondent considers that the formal public consultation stage for the draft strategy should have been advertised in the free papers. Respondent also considers that Friends of Parks Groups should have been contacted directly, and the distribution to Borough libraries should have</p>	<p>in all other respects.</p> <p>Future proposals coming forward within Borough Parks as a result of the Healthy Towns Programme proposals will be assessed against Adopted Unitary Development Plan (UDP) (October 2005) Policy SO6 "Parks", other UDP open space and nature conservation policies. These policies seek to promote parks use and protect their amenity.</p> <p>In relation to concerns regarding the public consultation completed for the draft Parks and Green Space Strategy, this matter has already been addressed as part of the response to Issue 7 above. (Please refer to Issue 7 response). In addition, as already highlighted as part of the Issue .8. response above, in order to help ensure maximum coverage for the formal public consultation stage for the draft Parks and</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document.</p>
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	<p>been wider.</p> <p>Respondent considers that the draft strategy is too long and too technical. It cannot be easily understood by non-professionals. There should be a précis. A smaller 10 page document giving an Executive Summary in non-technical language would be useful. A second document containing all the technical detail could stand separate from the Executive Summary.</p>	<p>Green Space Strategy, Council officers provided a power point consultation presentation to the Friends of Parks Groups Forum meeting on the evening of Tuesday 31<sup>st</sup> March 2009. In addition, further consultation presentations were also provided to the Access in Dudley Group on Monday, 9<sup>th</sup> March 2009 and to the Dudley Borough Local Access Forum (DBLAF) Group on Monday, 16<sup>th</sup> March 2009.</p> <p>Accept. The Council proposes to create a new non-technical and short summary document. This matter is addressed in further detail as part of the Issue .1. response above. (Please refer to Issue .1. response)</p> <p>A certain element of technical detail is required for this type of document in order for the</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document (see below)</p>
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		<p>Council's draft Parks and Green Space Strategy document to satisfy policy guidelines (set by Central Government in London) set out in Planning Policy Guidance Note 17 (PPG17) (2002) <i>"Planning for Open Space, Sport and Recreation"</i>. However, in order to ensure it is understood by a wide audience a non-technical Summary document will be provided.</p>	
<p><b>Issue .10.</b></p> <p>Respondent on behalf of Friends of Parks Network.</p>	<p>Respondent states that there should be an acknowledgement of the photograph contained on the cover sheet of the draft Parks and Green Space Strategy document stating that the photograph view is from Queen's Drive looking into Mary Steven's Park, Stourbridge.</p> <p>Paragraph 10.1 (page 167) of the draft strategy (under the Action Plan) refers to lighting in parks. Respondent considers</p>	<p>Accept. Include text after front cover sheet explaining that the cover sheet photograph relates to Mary Steven's Park, Stourbridge.</p> <p>The Council maintains its view that its existing wording in paragraph 10.1 of the draft strategy is clear and the Council does not therefore propose to delete reference to lighting in parks. The existing</p>	<p>Include following new text after front cover sheet</p> <p><b>"Photograph on front cover sheet of Mary Steven's Park, Stourbridge"</b>.</p> <p>No change.</p>

	<p>that this contradicts Police advice which is not to provide lighting in the parks. The Parks Lighting Guidance Note should be referred to.</p> <p>Respondent has concerns in relation to paragraphs 10.4 (indent five) and paragraph 10.5 (indent eighteen) over-supply of land being used to fund more valued green space improvements and built development pressures. Respondent considers that these paragraph will result in the loss of valuable and sensitive green space areas to built development pressures.</p> <p>In paragraph 10.5 (indent eleven), respondent suggests that the current wording in the draft strategy should be re-adjusted to state that ‘S106 monies would be used for ALL parks’.</p> <p>Respondent considers that the word “Others” requires further</p>	<p>words “where appropriate” are sufficiently clear.</p> <p>In relation to paragraphs 10.4 (indent five) and paragraph 10.5 (indent eighteen) the matter raised in this representation has already been addressed as part of the response to Issue 4 above. (Please refer to Issue 4 response).</p> <p>The Council maintains its view that its existing approach set out in paragraph 10.5 (indent eleven) is clear and the Council does not therefore propose to modify its existing approach.</p> <p>Focusing on paragraph 10.5 (indent 9) of the draft strategy, the matter raised in this representation has already been addressed as part of the response to Issue 4 above. (Please refer to Issue 4</p>	<p>No change.</p>
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	<p>clarification in paragraphs 10.5 (indents six and nine).</p> <p>Respondent considers that the 6-weeks formal public consultation stage for the draft Parks and Green Space Strategy completed during late February 2009 to early April 2009 has not been extensive enough. Strategy should have been advertised in free papers, Friends of Parks Groups should have each been contacted directly.</p> <p>Respondent suggests that it is unacceptable to charge Friends of Parks Groups for hard paper copies of the Parks and Green Space Strategy document.</p> <p>Paragraph 10.7 (indent seven) states: 'Where resources allow, increase the number of Friends of Groups across the Dudley Borough. Respondent suggests that existing wording 'Where resources allow' is not</p>	<p>response).</p> <p>In relation to concerns raised in relation to the level of public consultation completed for the draft strategy, the matter raised in this representation has already been addressed as part of the response to Issue 7 above. (Please refer to Issue 7 response).</p> <p>The Council is required to best use its resources and actively use electronic copies of the document. Electronic copies of the draft strategy can be viewed free of charge on the Council's planning website at the following address:- <a href="http://www.dudley.gov.uk/planning">www.dudley.gov.uk/planning</a> then click onto "Local Development Framework" then click onto "Parks and Green Space Strategy". Alternatively, reference paper copies of the Parks and Green Space Strategy can be viewed by members of the public at all main Dudley Libraries or at the</p>	
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	<p>necessary and should be deleted from the Strategy.</p> <p>Respondent has concerns relating to paragraph 10.4 (indent one) as this paragraph encourages cycling in Parks. Respondent suggests that Park byelaws need to be considered. Concern about encouraging mountain bikers and the impact this will have on the landscape.</p> <p>Focusing on paragraph 10.3, the respondent suggests that more green space sites in the Dudley Borough should be designated as Sites of Local Importance for Nature Conservation (SLINCs), in particular Mary Steven's Park (MSP), Stourbridge.</p> <p>The respondent has concerns regarding paragraph 10.9 (indent three) which promotes green waste recycling. Respondent notes that Friends of Park Group representatives</p>	<p>Council's Planning Reception at 3 St. James's Road, Dudley.</p> <p>Paper copies of the draft Strategy were handed free of charge to a proportion of key stakeholders during the 6-weeks formal public consultation stage.</p> <p>The Council considers that its view that its existing approach in paragraph 10.7 (indent seven) is clear and the Council does not therefore propose to modify its approach in this paragraph.</p> <p>Focusing on paragraph 10.4 (indent one) of the draft strategy, it is important to promote cycling within the Borough Parks and Green Spaces providing that there is no pedestrian safety conflict, no conflict with a sites nature conservation interest. Cycling can help to encourage more healthy lifestyles (through increased physical exercise)</p>	
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	<p>had reported a problem of spore-drift from the Iverley Green Refuse Centre which was affecting parts of Norton, Stourbridge.</p> <p>Respondent considers that the draft Parks and Green Space Strategy (February 2009) document is very technical and difficult to understand. An easy to understand non-technical Executive Summary is required.</p>	<p>and is a more sustainable form of transport, as cycling can help reduce the amount of private car-borne journeys. Positive for climate change and CO2 reduction/reducing fossil fuels consumption. In appropriate circumstances, it is therefore important that cycling is encouraged for sustainability and health reasons.</p> <p>In relation to the request that more green space sites within the Borough should be designated as Sites of Local Importance for Nature Conservation (SLINC's), this issue would be outside the remit of the Parks and Green Space Strategy (PPG17 Audit) document. The issue raised would be a matter which would need to be considered by Dudley Council's emerging draft Development Strategy Development Plan Document (DPD), currently being prepared as part of the Council's Local Development</p>	
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		<p>Framework (LDF).</p> <p>Green waste recycling is important for sustainability reasons as it reduces the amount of green waste going to landfill and reduces pressures for peat extraction. When considering siting small scale green waste recycling areas, the Council will ensure that such areas are sensitively located in order to reduce disruption to nearby residential occupiers and the visual amenity of green space.</p> <p>Accept. The Council proposes to create a new non-technical and short summary document which will set out the purpose and content of the Parks and Green Space Strategy, and summarise the main key findings which emerged from the Strategy. This will be non-technical and short to make it easy to understand. This matter is addressed in further detail in the Issue .1. response</p>	
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		above. (Please refer to Issue .1. response)	
<p><b>Issue .11.</b></p> <p>Chris Haynes on behalf of Cradley Raising Action Saving Heathens (CRASH) (Speedway pressure group)</p>	<p>Respondent considers that in relation to paragraph 7.40 of the draft strategy, the Accessibility Audit is deficient in that it relies for analysis on location and quantity but not on which outdoor sports are provided for. Definition of what is well served would then change.</p> <p>Focusing on paragraphs 8.14 to 8.17 (pages 150-151) of the draft strategy. Respondent considers that analysis of existing needs relies on the limited household survey and questions chosen. Respondent considers that it is therefore of limited value with the Outdoor Sports comment being limited to Level 1 Typology.</p> <p>Referring to paragraphs 8.31 to 8.33 (pages 155-156) of the draft Strategy. The respondent considers that future needs</p>	<p>In relation to concerns raised regarding paragraph 7.40, the Council maintains its view that the draft Strategy has been prepared in accordance with national planning guidance set out in PPG17 (2002).</p> <p>The Council is firmly of the view that its approach to outdoor sports green space provision within the draft Audit accords with PPG17 (2002) guidance.</p> <p>The Council disagrees with the suggestion that the analysis of existing needs relies on a limited Green Spaces Householder Questionnaire Survey. The Council maintains its view that its approach to the Green Spaces Householder Questionnaire Survey was extensive and thorough and was completed in accordance with guidance in PPG17</p>	<p>No change.</p>

	<p>analysis uses mainly population and demography. Respondent suggests it should include research on which outdoor sports are currently served or not available and what sports will need greater provision.</p> <p>Focusing on paragraph 9.14 and the table after paragraph 9.14 setting out Proposed Draft Quantity, Quality and Accessibility Local Standards. Respondent considers that use of Level 1 typology relies on the assumption that the outdoor sports facility is pitch based (e.g. such as football, rugby or cricket). Respondent considers that there are other outdoor sports including off road motor cycle racing which are not measured within the Strategy. There is a need to recognise how facilities could be shared (e.g. with educational use or a shared stadium).</p>	<p>(2002). In total, 6,500 Householder Questionnaire Surveys were sent out to Dudley Borough households for a period of two weeks consultation. The questionnaire design was comprehensive so that it covered all issues required by PPG17 (2002) guidance.</p> <p>In relation to paragraphs 8.31 to 8.33, identifying future needs by using future population projections and demography is an approach which is supported in PPG17 (2002). The Council does not therefore propose to modify its approach on this issue, as its approach accords with PPG17 (2002) guidance.</p> <p>The Council's approach to Outdoor Sports (e.g. the types of outdoor sports space captured within the strategy) is in accordance with PPG17 (2002) guidance and the PPG17 Typology table set out</p>	
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	<p>Respondent notes that in paragraph 10.5 (pages 168-169) there is a mention of a wide variety of sports, which is welcome but should be expanded upon. Rather than seeing low quality existing sites as possible to lose, they would provide an opportunity for different types of provision. Respondent considers that the constant reference to 'where resources allow and practical to do so' undermines the policy and is an excuse to do nothing.</p> <p>The respondent states that the draft strategy would benefit from a less simplistic approach to analysis of provision and assessed need. Many green spaces are large enough to accommodate a range of facilities requiring a range of typology assessments. CRASH continues to pursue locations for a 'green' stadium to accommodate speedway racing to meet the identified demand within the area. We</p>	<p>under paragraph 2.6 (page 11) of the PPG17 Companion Guide "Assessing Needs and Opportunities" (September 2002). For example, under paragraph 2.6 (page 11) (PPG17 Typology table), the PPG17 Companion Guide "Assessing needs and opportunities (September 2002) is perfectly clear that a Council's PPG17 audit should classify outdoor sports in the following way for the purposes of completing a PPG17 compliant order:- Outdoor Sports facilities where the primary purpose is for "participation in outdoor sports, such as pitch sports, tennis, bowls, athletics or countryside and water sports". The Council considers that it has followed the approach set out in PPG17 (2002) on this issue.</p> <p>The Council's approach to circumstances where there is a large amount (over supply) of low quality, low use, low value</p>	
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	<p>look for these policy documents to recognise this outside sport and suggest provision is made as part of a multi-use opportunity.</p>	<p>green space (paragraph 10.5 (indent 18) of the draft strategy is an approach which is supported in PPG17 (2002). The Council does however propose to add additional clarity to this issue by re-adjusting and deleting existing text in paragraph 10.5 (indent 18) of the draft Strategy. This issue is covered in greater detail in the Issue .4. response above. Please refer to Issue .4. response.</p> <p>Use of the term “where resources allow and where it is practical to do so” are necessary terms to use as any actions contained under Chapter 10 (Action Plan) of the draft strategy, need to be balanced against available Council resources.</p>	<p>Comments noted.</p>
<p><b>Issue .12.</b> Tony Foley on behalf of Netherton Heritage and Conservation Group.</p>	<p>Respondent considers that the area of land from Cinder Bank, former location of Netherton Hall and Farm should be densely reforested with locally occurring tree species such as</p>	<p>Comments on this issue are noted, however proposals to re-forest areas of green space needs to be carefully balanced against the need to protect a sites continued nature</p>	<p>No change.</p>

	<p>Oak, Ash, Elm, etc. This would benefit the local community and the timber could be used for biomass fuel.</p> <p>Respondent considers that ancient pathways could be opened up for walkers and Daphne Pool could be extended and new pools created to create new wildlife habitats.</p> <p>Respondent suggests that former Netherton Hall and Farm could be rebuilt noting that these could provide organic farms serving local networks.</p>	<p>conservation interest and biodiversity value. For example, the need to protect sensitive wildflower grassland habitats or wetland habitats.</p> <p>Alongside existing guidance set out in Dudley Council's adopted Nature Conservation Supplementary Planning Document (SPD) (adopted September 2006), the Council's Parks and Green Space Strategy will have a positive role to play in helping to ensure that existing wildlife habitats are sensitively and appropriately managed and where possible, new wildlife habitats are created.</p> <p>Issues connected to former Netherton Hall and farm are outside the remit of the Parks and Green Space Strategy and cannot therefore be considered within the draft Strategy.</p>	
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<p><b>Issue .13.</b></p> <p>Maurice Bate (Kingswinford)</p>	<p>Respondent considers that the draft Parks and Green Space Strategy should include a précis/Executive Summary for ease of reading.</p> <p>Referring to a site-specific issue, the respondent states that the small area of green space within the cul-de-sac of Ambergate Drive provides a good recreational area for local youths and children. Respondent maintains that this green space area should be protected from future built development pressures.</p>	<p>Accept. The Council proposes to create a new non-technical and short summary document. This matter is addressed in further detail as part of the Issue .1. response above. (Please refer to Issue .1. response)</p> <p>The Council considers that areas of sensitive and important green space will continue to remain protected by open space policies set out in the Council's Local Development Framework (LDF) and the Parks and Green Space Strategy document will help to provide further protection to such areas. For example, by providing additional robust and credible evidence and up-to-date information on the quantity, quality, accessibility and distribution of the Borough's Parks and other green space areas.</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document (see below)</p>
<p><b>Issue .14.</b></p>	<p>The respondent considers that</p>	<p>Whilst the concerns raised by</p>	

<p>Birmingham Canal Navigations Society</p>	<p>the document lacks clarity as to whether the canals and associated open spaces within the Borough are considered as part of the Parks and Green Space Strategy. It is unclear as to whether they are included as semi-natural green space or elsewhere.</p> <p>Respondent reinforces the view that Canals form a vital part of the draft Parks and Green Space Strategy with their towpaths and adjacent green spaces forming links throughout the Borough and between other parks and open spaces.</p> <p>Respondent considers that canal towpaths should be listed in paragraph 2.13 of the draft strategy in the same way as farmland with restricted public access is included.</p> <p>Respondent suggests that Canal towpaths have been excluded from paragraph 4.16</p>	<p>the respondent have been noted, the types of open space captured within the Council's draft Parks and Green Space Strategy (e.g. Parks and Gardens, Outdoor Sports green space, etc.) has been guided by the approach recommended in PPG17 (2002) and the PPG17 Companion Guide. For clarification purposes, the Council's view is that canals would fall under (and would therefore have been captured) either natural and semi-natural green space areas or green corridors.</p> <p>The Council recognises the importance of canals within the Borough and their contribution to outdoor informal recreation, nature conservation and tourism, and their contribution to landscape and unique identify of the Borough.</p> <p>The Council does not propose to include reference to canal</p>	
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	<p>(Figure 4.16.1) should be included given their recreational importance.</p> <p>Respondent states that there is no reference to canals in paragraphs 5.1, 5.9 and Table 5.23.1 on page 87. Canals should be referred to in paragraph 8.33 as green access routes for visitors into the Borough.</p> <p>The importance of the Borough's canals needs to be reinforced and better signposted within the Parks and Green Space Strategy.</p>	<p>towpaths under paragraph 2.13 of the draft Strategy, as the purpose of this paragraph is to focus on Green Belt issues and areas of open arable farmland located inside the Green Belt.</p> <p>Paragraph 4.16 (Figure 4.16.1) focuses on the most visited Dudley Borough Parks and Green Spaces (sites visited during the last 12 months) based on findings from the June 2009 Green Space Householder Questionnaire Survey. This paragraph focuses on key Borough green space sites such as parks and nature reserves. It would be inappropriate to include canals within Figure 4.16.1.</p> <p>Focusing on paragraphs 5.1 and 5.9 and Table 5.23.1 of the draft Strategy, the Council maintains its view that the existing approach in these paragraphs and Table 5.23.1 accords fully with PPG17</p>	<p>Include the following new text after the existing words "visiting the Borough's parks" in paragraph 8.33 of the draft strategy. New text: "<b>Other green spaces and canals</b>".</p>
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		<p>guidance and does not therefore propose to modify its approach on this issue.</p> <p>Agree. Include specific wording in paragraph 8.33 of the draft Strategy referring to canals.</p>	
<p><b>Issue .15.</b></p> <p>Environment Agency</p>	<p>Respondent welcomes reference made to Planning Policy Statement 25 (PPS25) (2006) 'Development and Flood Risk' and reference made throughout the draft Parks and Green Space Strategy of the importance of green spaces in reducing flood risk and contributing to the support and enhancement of biodiversity levels.</p> <p>The respondent welcomes reference to the importance of urban green spaces to urban cooling, reducing air pollution, and the role of green corridors for sustaining biodiversity levels, as specified in Section 8.19 (and 8.34) and reference</p>	<p>Comments noted and welcomed.</p> <p>Accept. Under paragraph 2.59 of the draft strategy include reference to the Black Country Strategic Flood Risk Assessment (SFRA), under sub-regional policy context (Chapter 2).</p> <p>Include additional new text under the Sub-Regional Policy Context section of the draft Strategy (paragraph 2.47) under the heading "Emerging Black Country Joint Core Strategy (JCS) – "Preferred Options" Report (March 2008) referring to flood risk issues.</p>	<p>Include the following new additional text under paragraph 2.59 after the existing text "West Midlands Visitor Economy Strategy". New additional text: <b>"and the Black Country Strategic Flood Risk Assessment (SFRA)"</b>.</p> <p>Add the following additional new text after the penultimate sentence in paragraph 2.47 of the draft Strategy: <b>"Studies produced as part of the Black Country Joint Core Strategy (JCS) include a Strategic Flood Risk Assessment (SFRA), a Habitats Regulation</b></p>

	<p>to the need to reduce flood risk within the borough by removing, where applicable, areas of unnecessary hard-standings and providing new areas of green space, as specified in Section 8.20.</p> <p>Welcome reference to encourage developers to build-in Sustainable Urban Drainage Systems (SUDS).</p> <p>The respondent states that the Black Country Strategic Flood Risk Assessment (SFRA) should be included under Chapter 2 (Review of national, regional and local-level policy), under local policy documents.</p> <p>The respondent considers that text should be included that refers to “the retention of flood plains, as areas not suitable for development, present strong opportunities for green infrastructure, as the linear nature of these features can act as natural linkages</p>	<p>The Council does not propose to add reference to the need to retain flood plains within the Parks and Green Space Strategy as the Council maintains its view that this issue falls outside the remit of the Parks and Green Space Strategy document.</p> <p>The issue raised is already covered in the emerging Black Country Joint Care Strategy (JCS).</p> <p>In relation to the suggestion that a statement should be included which the strategy regarding increasing flood storage capacity, again, the Council maintains its view that this issue is a matter for the emerging Black Country Joint Core Strategy (JCS), not the Council’s Parks and Green Space Strategy.</p>	<p><b>Assessment and a Water Cycle Study.”</b></p>
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	<p>between urban areas and the surrounding countryside, and that habitats associated with flood plains are frequently of high value.”</p> <p>The respondent considers that a statement should be included within the Strategy regarding the Borough’s aims to increase flood storage capacity in the Borough through the re-creation of functional floodplain areas where possible and the setting back of flood defences where appropriate, in line with government guidance.</p>	<p>Comments noted.</p> <p>Comments noted. The Council proposes to include reference to the Strategic Flood Risk Assessment (SFRA), Habitats Regulation Assessment and a Water Cycle Study within the Parks and Green Space Strategy. This aspect is discussed in further detail above within Issue .15.</p>	
<p><b>Issue .16.</b> Sport England (West Midlands)</p>	<p>The respondent states that Sport England support the preparation of the strategy as it constitutes an important</p>	<p>Comments noted and welcomed.</p>	<p>No change.</p>

	<p>evidence document to underpin effective planning for green spaces in Dudley.</p> <p>Sport England considers that in order to have a comprehensive set of PPG17 (2002) compliant strategies, a Playing Pitch Audit and Strategy need to be undertaken alongside the work on Parks and Green Spaces. Work completed within the draft Parks and Green Strategy on Outdoor Sport Green Space and built indoor sports facilities needs to be further expanded. Sport England are supporting the Council on these aspects as part of the emerging Facilities Improvement Service (FIS) work.</p> <p>The respondent states that the recent Community Infrastructure Levy (CIL) Statement from CLG places emphasis on local authorities to identify specific deficiencies in areas and identify specific</p>	<p>The Council considers that purpose of the strategy is to focus on parks and other green space areas. As stated below, the Council's emerging Facilities Improvement Service (FIS) work will consider the provision of built indoor sports facilities provision across the Dudley Borough.</p> <p>Comments noted. The Council is currently working on an emerging draft assessment of built indoor sports facilities across the Dudley Borough with the support of Sport England (West Midlands) as part of Dudley Council's Facilities Improvement Service (FIS) work. It is anticipated that an emerging draft FIS document will be in place by early November 2009. However, as reinforced above the purpose of the Parks and Green Space is to focus and concentrate on parks and other green space areas.</p>	
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	<p>projects which CIL can contribute to. Local standards from PPG17 audits will not do this and it is vital that Local Authorities are able to respond to the opportunities that CIL will present.</p> <p>PPG17 talks about open space, sport and recreation facilities meeting the needs of the local communities <u>and visitors</u>. This could be important with regard to facilities which attract users from outside Dudley.</p> <p>Focusing on paragraph 2.55 (page 19) (under the Sub-Regional Policy Context Section), the respondent states that Sport England does not agree that the emerging Black Country Sports Facility Strategy (BCSFS) should be described as an aspirational document.</p>	<p>Whilst the comments are noted from the respondent on this issue, the Council maintains its view that a new Playing Pitch Strategy is not currently required at this stage. The Council already has a Playing Pitch Strategy adopted in 2003. However, where resources allow, the Council is keen to produce an updated version of the 2003 Playing Pitch Strategy at the appropriate time. The Council considers that the evidence base provided by the Council's Parks and Green Space Strategy on outdoor sports green space provision issues is compliant with, and satisfies PPG17 (2002) guidance.</p> <p>In relation to the Community Infrastructure Levy (CIL), the Council maintains its views that the Council's Parks and Green Space Strategy will have a positive impact in helping to identify on-the-ground public open space</p>	
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		<p>improvements, working alongside the Council's adopted Planning Obligations Supplementary Planning Document (SPD) (2009), the adopted Open Space, Sport and Recreation Provision SPD (2007), and adopted Nature Conservation SPD (2006).</p> <p>Comments noted.</p> <p>The Council considers that its existing approach to the emerging draft Black Country Sports Facility Strategy (BCSF) is acceptable and does not therefore propose to modify its approach on this issue.</p>	
<p><b>Issue .17.</b> Butterfly Conservation (Northants)</p>	<p>The respondent supports the Strategy as it looks to assess the needs of open space for people and wildlife in a systematic and well thought out approach. Respondent states that it takes into consideration the importance of a network of green spaces</p>	<p>Comments noted and welcomed.</p>	<p>No change.</p>

	<p>to support biodiversity and recognises the increasing importance of such wildlife corridors in the context of climate change (paragraph 8.35). Section 10.3 on Biodiversity and Nature Conservation considers all the appropriate issues.</p> <p>The respondent considers that the Strategy will help to achieve the aims of Butterfly Conservation in terms of protecting and enhancing semi- natural urban areas for butterflies and moths and providing opportunities to increase numbers of key species within development proposals.</p>	<p>Comments noted and welcomed.</p>	
<p><b>Issue .18.</b> Access in Dudley</p>	<p>Respondent queries whether the Quality and Accessibility issues referred to under paragraph 1.8. of the draft Strategy sufficiently consider disabled access issues such as dropped kerbs, level paths, adequate signage, fully inclusive play equipment, etc.</p>	<p>Welcomed. The 'Quality Audit' assessment completed for the Parks and Green Space Strategy did consider disabled access considerations when assessing green space areas within the Borough. Paragraph 6.6 (indent four) of the draft Parks and Green</p>	

	<p>Focusing on accessibility and Distribution Issues, the respondent states that when assessing the accessibility of parks/green spaces, consideration needs to be given to the needs of disabled people.</p> <p>In relation to 'need'. The respondent considers that additional provision should be made when identifying current and future needs for parks/green spaces, for the needs of an increasingly elderly and disabled population whilst also considering the needs of disable young people/children to be included in social and recreational activities. Fully inclusive, play equipment should be provided as a priority.</p> <p>Under types of green space captured within the Parks and Green Space Strategy, respondent suggests that the</p>	<p>Space Strategy document, under the sub heading 'A Welcoming Park' is clear that "Equal access for all" is part of the assessment criteria used as part of the Green Flag Quality Audit Assessment. This would have included considering disabled access as part of the green space on-site assessments. The Council considers that its approach taken to the Quality Audit is compliant with guidance set out in PPG17 (2002) and the accompanying PPG17 Companion Guide "Assessing Needs and Opportunities" (2002).</p> <p>Comments noted.</p> <p>Whilst the comments raised by the respondent on this issue are noted and welcomed and the Council recognises the</p>	
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	<p>‘Provision for Young People’ green space should include and consider green space that is accessible for children/young people with disabilities.</p> <p>The respondent considers that the Council needs to re-assess existing green space sites captured within the Quantity Audit, and establish how many of these green space sites have disable access including level access, adequate signage, inclusive equipment, etc. This will reduce the amount of sites that have ‘unrestricted public access’.</p> <p>Referring to the Accessibility Audit Buffer Maps, the respondent suggests that the Council needs to consider mobility issues and peoples ability to walk/travel 15 minutes when assessing if the distribution of sites in the Borough is adequate.</p>	<p>importance of this issue, in relation to the “Provision for children and young people green space provision”, the Council considers that its existing approach on this issue is in accordance with PPG17 (2002) guidance and the accompanying PPG17 Companion Guide “Assessing Needs and Opportunities” (2002).</p> <p>In relation to the respondents request that the Council should re-assess existing green space sites captured within the Borough-wide Quantity Audit, and establish how many of these sites have disabled access, the Council considers that its existing approach taken in the Borough-wide Quantity Audit is compliant and accords with national planning guidance set out in PPG17 (2002). The Council does not therefore propose to modify its approach on this issue.</p>	
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	<p>Respondent states that the Council should consider the provision of appropriate seating at no more than 50 meter intervals in parks/green spaces, provision for accessible spaces for children/young people with disabilities, disabled parents. Respondent also considers that adequate provision should be made for adequate lighting, colour contrasted handrails and coloured nosing on steps within parks.</p> <p>Respondent states that the Park Standards document produced by Access in Dudley in partnership with the Council's Department of Urban Environment (DUE) should be referred to in the Strategy.</p> <p>Respondent considers that the six weeks formal public consultation stage completed for draft Strategy was insufficient timescale.</p>	<p>Again, in relation to the buffer maps, the Council considers that its existing approach on this issue accords with PPG17 (2002) guidance. Furthermore, the approach to buffer maps within the Accessibility Audit has also been informed by the robust and credible evidence base provided by findings from the June 2008 Green Spaces Householder Questionnaire Survey of 6,500 Dudley Borough households.</p> <p>The Council will always pursue opportunities (via Section 106 planning contributions and other external funding opportunities) to enhance the Borough's parks and other green spaces based on key up-to-date needs and area-based local priorities in accordance with Circular 05/2005 '<i>Planning Obligations</i>' national planning guidance. Where appropriate, this can include disabled access improvements of the type</p>	
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	<p>Respondent states Consultation should have taken place for a period of twelve weeks.</p> <p>Respondent considers that alternative formats such as large print, audio, easy read versions, etc. are essential in order to allow all sections of the community to comment on the Council's draft Parks and Green Space Strategy.</p> <p>Respondent suggests that an Executive Summary of 3-4 pages needs to be prepared to accompany the draft Parks and Green Space Strategy document. This could then be produced in alternative formats so it is accessible to all sections of the community.</p>	<p>suggested by the respondent.</p> <p>In relation to the Parks Standards document, the Council does not propose to refer to this document within the Parks and Green Space Strategy. The Council maintains its view that its existing approach is sufficient and accords with PPG17 (2002) guidance.</p> <p>Issues connected to the 6-weeks formal public consultation stage have already been addressed as part of the Issue 7 response above. (Please refer to Issue 7 response).</p> <p>The Council accepts the suggestion that a non-technical short Summary document is required and therefore proposes to include a new Summary document. This matter has already been addressed as part of the Issue .1. response above. (Please</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document (see below)</p>
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		<p>refer to the Issue .1. response).</p> <p>The Council can explore making this short non-technical Summary document available in alternative formats so that it is accessible to all sections of the community.</p>	
<p><b>Issue .19.</b></p> <p>David Holloway (Local resident)</p>	<p>The respondent considers that the draft Strategy requires an Executive Summary, inclusion of more appendices, reduced document length, and possible inclusion of more pictures within the Strategy.</p> <p>Respondent unsure how the draft Parks and Green Space Strategy Action Plan relates to</p>	<p>Matters connected to the Executive Summary have already been addressed under Issues 1 above.</p> <p>The Parks and Green Space Strategy will support the work of the Council's adopted Open Space, Sport and Recreation Provision Supplementary Planning Document (SPD)</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document (see below)</p>

	<p>guidance already contained in the Council's adopted Open Space, Sport and Recreation Provision Supplementary Planning Document (SPD) (adopted June 2007). Respondent suggests that the draft Parks and Green Space Strategy 'Action Plan' should be given more profile within the Strategy.</p> <p>The respondent is unclear in relation to the coverage of the draft Strategy. Respondent queries whether other types of open space are captured within the audit other than Parks, such as informal open space areas and Local Nature Reserves. Respondent considers that the document places too much emphasis on parks.</p> <p>Respondent states that green linkages located on the periphery of the Borough in the Green Belt countryside are an important outdoor recreational</p>	<p>(adopted June 2007) as it will help to identify key on-the-ground and up-to-date improvement priorities for specific open spaces sites and parks across the Borough. It will provide the credible evidence base to help support S106 contributions coming forward through the adopted Open Space, Sport and Recreation Provision SPD (2007).</p> <p>The Council proposes to include a new non-technical short Summary document. This will help to provide further clarity in relation to the coverage of the Parks and Green Space Strategy in a non-technical easy to understand way. The Council does not propose to modify its approach to the Action Plan within the draft Strategy as the Council considers that its existing approach accords with PPG17 (2002) guidance.</p>	
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	<p>resource.</p> <p>Focusing on the Action Plan, respondent queries whether the prescribed actions should be less caveated. Should we be confirming our intent positively and then pursuing a delivery mechanism. Conversely, if the action has no chance of being implemented, then it should not be included.</p> <p>Focusing on personal safety issues in parks, respondent stresses the need for caution as it is important that sterile environments are not created within the borough's parks. A parks nature conservation interest should not be harmed as a result of over excessive vegetation clearance to improve security and natural surveillance. Informal natural and semi-natural green space areas are important and this is supported by findings from the June 2008 Green Spaces</p>	<p>The concept of the Parks and Green Space Strategy is explained in paragraph 5.1 (Quantity Audit) and Table 7.15.1 (types of open space captured) of the draft strategy. The Council considers that its existing approach is clear on this issue.</p> <p>The strategy seeks a balance between formal parks and other types of green space such as outdoor sports space and natural and semi-natural green space. The Council refutes with the suggestion that the strategy only focuses on parks and neglects other types of green space.</p> <p>The Council has included areas of green space (green linkages) on the periphery of the Borough located in the Green Belt where unrestricted public access was known to exist. However, areas of private Green Belt farmland (such as ploughed arable</p>	
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	<p>Householder Questionnaire Survey.</p> <p>Respondents suggests that expanding the green network opposed to putting in formal recreational equipment within parks, may offer a better solution. Allowing informal walking and cycling experiences in green spaces is important.</p> <p>Respondent suggests that recommendations on climate change need sharpening within the draft Strategy. Potential for more secure cycling facilities and a recycling/compost area in each park.</p> <p>Should be more mention of the role of “Friends of Parks” in the maintenance and upgrading of Parks.</p>	<p>farmland) with restricted public access have been excluded from the Council’s strategy.</p> <p>The Council maintains its view that its approach to this issue is in accordance with PPG17 (2002) guidance.</p> <p>The Council maintains its view that the approach taken to the Action Plan within the draft Strategy is in accordance with PPG17 (2002) guidance and does not therefore propose to modify its approach on this issue.</p> <p>Comments noted.</p> <p>The Council considers that its existing approach on climate change is comprehensive and sufficient. The Council does not therefore propose to modify its approach on this issue.</p> <p>Paragraph 2.80 of the draft</p>	
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	<p>Is there scope for creation of new parks particularly in areas of open space deficiency. A new park within Brierley Hill Strategic Centre providing link to Saltwells.</p> <p>Concerns relating to the text within the strategy which states: ‘...where there is a large amount (over supply) of low quality, low use, low value green space. Some of these areas could potentially be considered for other uses...’ (paragraph 10.5, indent 18). Such open space areas should be enhanced with landscaping. Concerns may encourage built</p>	<p>strategy states:- “...involving Friends of Parks Groups in their future and management .....” The Council considers that this existing text is sufficiently clear in relation to the key role Friends of Parks Groups have in relation to helping the Council to maintain and upgrade the Borough’s parks. The Council does not therefore propose to modify its approach on this issue.</p> <p>In relation to open space provision within Brierley Hill Strategic Centre, this issue is being considered as part of the Council’s emerging draft Brierley Hill Area Action Plan (AAP).</p> <p>The Parks and Green Space Strategy can assist in providing the robust and credible evidence base to support the creation of a new park by upgrading existing green space areas of sufficient land parcel size to a parks status in</p>	
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	<p>development pressures.</p> <p>Respondent considers that there is little mention within the draft Strategy to Public Art and the importance of maintaining and enhancing the Public Rights of Way network within the borough's green spaces.</p> <p>The text 'Sense of well-being' requires further clarification within the Strategy.</p>	<p>parts of the urban area where there is an under-supply/deficiency (e.g. gap in provision) of existing parks and gardens green space provision. This aspect is covered in detail in paragraph 5.13 of the draft strategy.</p> <p>Focusing on concerns raised in relation to paragraph 10.5 (indent 18) of the draft strategy, which states: "..... where there is a large amount (over supply) of low quality, low use, low value green space....." and concerns relating to built development pressures, this issue has already been addressed as part of the response to Issue 4 above. (Please refer to Issue 4 response). To re-confirm, the Council considers that the Parks and Green Space Strategy will help to protect important and sensitive open space areas within the borough.</p>	
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		Issues connected to Public Art contributions would be addressed as part of the Council's adopted Planning Obligations Supplementary Planning Document (SPD) (2009) and adopted Open Space, Sport and Recreation Provision SPD (2007).	
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<p><b>Issue .20.</b></p> <p>Jennifer Hatton (Halesowen)</p>	<p>Respondent objects to the absence of the Coombswood 'Green Wedge' from the draft Parks and Green Space Strategy document. This area is an important area of well used green space for the local community.</p> <p>Consideration needs to be given to the length of the document and the amount of detail. Likely to be a daunting document to readers not familiar with policy documents.</p> <p>Respondent considers that the GIS maps contained in Appendix A (Accessibility Audit Maps) of the strategy require better definition as the map images remain unclear given the scale of the maps.</p> <p>The respondent welcomes that gaps in green space provision (e.g. deficiencies) have been identified by the Council within the Accessibility Audit maps.</p>	<p>To clarify the position, the Coombeswood green space has been included within the Council's draft Parks and Green Space Strategy. The Coombeswood Wedge Green Space has been recorded under the natural and semi-natural green space typology, under the Accessible Natural Green Space (ANGST) sites between 20 hectares to 99.9 hectares in land parcel size with 2 kilometre buffer distances around the edge of the site. This site can be viewed by referring to the Accessibility Audit ANGST maps contained in Appendix A of the draft Parks and Green Space Strategy document.</p> <p>Accept. The Council proposes to create a new non-technical and short summary document. This matter is addressed in further detail as part of the Issue .1. response above. (Please refer to Issue .1. response)</p>	<p><b>Provide a new non-technical and short Parks and Green Space Strategy Summary document.</b> The existing 177 page Parks and Green Space Strategy document will be re-titled as a background Technical Document (see below)</p>
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		<p>In order for the Parks and Green Space Strategy to satisfy policy guidelines set out in national planning guidance in Planning Policy Guidance Note 17 (PPG17) (2002) "Planning for Open Space, Sport and Recreation" and in order for the document to withstand legal challenge a certain element of technical detail is required for the strategy. The inclusion of a new short non-technical Summary document (as explained in the Issue .1. response above) will help to simplify the document.</p> <p>Given the scale of the Geographical Information System (GIS) Accessibility Audit Maps contained in Appendix .A. of the draft Strategy (e.g. the need for each individual map to cover the entire Dudley Borough land</p>	
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		<p>area) is it not possible to enhance any further the clarity of the individual map images. The Council considers that the Accessibility Audit GIS maps are sufficiently clear given the scale needed to cover the entire Dudley Borough, and that the mapping approach taken by the Council accords with PPG17 (2002) guidance.</p>	
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<p><b>Issue .21.</b></p> <p>Jayne Pilkington on behalf of Dudley Council Historic Environment Section</p>	<p>Respondent considers that within the bullet points in paragraph 2.63 (page 21) of the draft Strategy, reference should be made to Dudley Council’s Adopted Unitary Development Plan (UDP) (October 2005) Policy HE2 “Landscape Heritage Areas”.</p> <p>Under the sub-heading ‘Supplementary Planning Documents (SPDs)’, from paragraph 2.68 onwards, the respondent considers that reference should also be made to Dudley Council’s adopted Historic Environment Supplementary Planning Document (SPD) (September 2006).</p>	<p>Comments welcomed and noted. Accept. Include wording referring to Dudley Council’s Adopted Unitary Development Plan (UDP) (2005) Policy HE2 “Landscape Heritage Areas” in paragraph 2.63.</p> <p>Comments welcomed and noted. Accept. Include reference to Dudley Council’s adopted Historic Environment Supplementary Planning Document (SPD) (2006) under the local-level Planning Policy Context Chapter.</p>	<p>Add the following wording in paragraph 2.63 under bullet point 14 <b>“Policy HE2 Landscape Heritage Areas”</b>.</p> <p>Add the following new additional text after paragraph 2.73 of the draft Strategy: <b>“Dudley Council adopted Historic Environment SPD (adopted September 2006). The purpose of this SPD is to support the historic environment policies in the Council’s adopted UDP (2005), and explain how they should be addressed in the development control process. A key aim of the document is to protect and conserve locally distinctive characteristics of the Borough’s existing townscapes and landscapes whilst also ensuring that new development respects and/or enhances the existing character of distinctive localities”</b>.</p>
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<p><b>Issue .22.</b></p> <p>The Inland Waterways Association (IWA) (Birmingham, Black Country &amp; Worcestershire Branch)</p>	<p>The respondent states that it is not clear within the draft Strategy whether the Council considers the canal network to be part of the Borough's Green Open Spaces or not.</p> <p>Confusion surrounding reference to 'Lapal Canal' under Appendix C. of the draft strategy, against I.D. reference number 955 (line 955) as there is no such thing as the Lapal Canal. Respondent queries whether the Council is referring to the Dudley Number 2 Canal in Halesowen.</p> <p>Respondent considers that there is little mention to canals within the draft strategy, given their outdoor recreational importance and importance as a natural green space resource. Respondent states that they should be given greater recognition within the Strategy.</p> <p>Canals should be referred to in</p>	<p>This matter has already been addressed as part of the response to Issue 14 above. (Please refer to Issue 14 response).</p> <p>In relation to the concerns regarding Lapal Canal, the Council has chosen this name as it is the name that Council Green Care (grounds maintenance) and Parks Officers recognise so that this open space location can be easily identified. The Council does not therefore propose to modify its approach on this issue.</p> <p>This matter has already been addressed as part of the response to Issue 14 above. (Please refer to Issue 14 response).</p> <p>The Council does not consider it necessary to refer to the document "Waterways for Tomorrow (2000) " and</p>	<p>Please refer to Issue 14 response above.</p>
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	<p>paragraph 2.13 of the draft strategy in the same way that Green Belt farmland has been referred to.</p> <p>Under the 'National Planning Policy Context', the respondent considers that reference needs to be made to the following documents:- The Government policy document 'Waterways for Tomorrow (2000)'; The European Union (EU) Water Framework Directive. The contents of this EU Directive in addition to PPS25 (2006) 'Development and Floodrisk', will have an affect on water supply, natural drainage and flooding.</p> <p>The respondent suggests that under the 'Regional Planning Policy Context' of the draft Strategy, the Environment Agency's emerging River Severn Basin Flood Management Plan document should be referred to. The CEU Water Framework</p>	<p>reference to the European Union (EU) Water Framework Directive within the national planning policy context chapter of the Parks and Green Space Strategy. Canals are already referred to in paragraph 2.48 (under the heading emerging Black Country Joint Core Strategy) within the sub-regional policy context. Canals have also been referred to under local-level planning policy context under the sub-heading 'Dudley Council Adopted UDP (2005)' by reference to "Policy HE7 - Canals" and additional wording has been introduced to highlight the importance of canals as part of the changes introduced as part of the response to Issue 14 above.</p> <p>In relation to the Environment Agency's emerging River Severn Basin Flood Management Plan, this matter has already been addressed as part of the response to</p>	
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	<p>Directive should also be referred to.</p> <p>Under the ‘Local-level Planning Policy Context’ the respondent states that the Council’s Canal Policy Document should be referred to.</p> <p>Respondent considers that canals should be referred to under paragraphs 4.16 (figure 4.16.1) of the draft Strategy. (Most visited Dudley Borough Parks and Green Spaces), paragraph 5.1. (Quality Audit - sites captured). Respondent also considers that canals should be referred to within paragraph 5.9. (Table 5.9.1) under ‘Limited’ access sites.</p> <p>Respondent suggests that reference to canals should be made in the following paragraphs of the draft strategy. Paragraph 4.16 (figure 4.16.1) (Most visited Dudley Borough Parks and Green Space Sites), paragraph</p>	<p>Issue 15 above. (Please refer to Issue 15 response).</p> <p>Dudley Council’s Canal Strategy has already been referred to within the local-level planning policy context chapter, in paragraph 2.84 (further local-level guidance) of the draft Parks and Green Space Strategy.</p> <p>In relation to paragraphs 4.16 (figure 4.16.1), 5.1, 5.9, Table 5.9.1, 5.23.1 and 8.33 of the draft Parks and Green Space Strategy, this matter has already been addressed as part of the response to Issue 14 above. (Please refer to Issue 14 response).</p> <p>The Council considers that it would not be appropriate to include canals within Table 9.14.1 (suggested new Local Open Space Standards Dudley Council has identified for its Parks and Green Space Strategy) of the draft strategy</p>	
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	<p>5.1 (Quality Audit - sites captured), and paragraph 5.9 (Table 5.9.1) within 'description' column next to 'Limited' access. And within Table 5.23.1 (total amount of green space captured).</p> <p>Focusing on paragraph 5.32 under the Quantity Audit Chapter of the draft Strategy, the respondent queries why canals are not defined within the committee area analysis. Respondent also queries whether canals come under the analysis within Table 5.32.2 (Number of natural and semi-natural green space sites by Committee Area).</p> <p>Respondent suggests that the canal network provides a green tourist link into the Dudley Borough. They should therefore be referred to under paragraph 8.33 (possible future tourism growth).</p> <p>The respondent considers that</p>	<p>as the purpose of this table is to focus on the types of open space (typologies) identifies and recommended by PPG17 (2002) guidance and paragraph 2.6 of the accompanying PPG17 Companion Guide "Assessing Needs and Opportunities (September 2002)". The Council maintains its view that its existing approach on this issue accords with PPG17 (2002) guidance and does not therefore propose to modify its approach on this issue. Furthermore, as already stated in the Issue 14 response above, canals would already be captured and would fall under either natural and semi-natural green space or green corridors.</p>	
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	<p>canals should be referred to within Table 9.14.1 (suggested new Local Open Space Standards Dudley Council has identified for its Parks and Green Space Strategy). The respondent has concerns that canals do not appear to have been included within the Council's draft Parks and Green Space Strategy document.</p>		
<p><b>Issue .23.</b> Geoffrey Whitehouse (Kingswinford)</p>	<p>The respondent is supporting the Council's draft Parks and Green Space Strategy. Focusing on a site-specific issue, the respondent stresses the wildlife habitat importance and informal recreation value to the local community of the lake located within the wider vicinity of Blandfordmere, Kingswinford. Respondent stresses the need for the lake environment to be regularly maintained.</p>	<p>Comments noted and welcomed.</p> <p>The Council considers that by providing the evidence base to help attract section 106 monies and other external funding sources, the Parks and Green Space Strategy will play a positive role in helping to ensure that such sites are sensitively and appropriately maintained for the benefit of nature conservation as well as for local residents.</p>	<p>No change</p>