

Statement of Community Involvement for the Nature Conservation and Historic Environment Supplementary Planning Documents

September 2006



For further information concerning the Nature Conservation and Historic Environment Supplementary Planning Document Statement of Community Involvement please contact:

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The SPDs, Statement of Community Involvement and related documents can also be found on the Council's website as www.dudley.gov.uk/environment--planning/planning/local-development-framework

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1. What is the Statement of Community Involvement?

- 1.1 Under the new planning system the Council will be producing a series of documents collectively known as the Local Development Framework (LDF).
- 1.2 Two types of planning document will be produced: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). It will be the role of Supplementary Planning Documents to reinforce existing areas of policy and to provide detailed guidance on policy requirements.
- 1.3 The new planning system has considerable emphasis in community involvement in development planning. Accordingly, Councils are required to produce a Statement of Community Involvement (SCI).
- 1.4 The Statement of Community Involvement sets out the Council's vision for involving communities in the planning process. Its aim is to be a framework for the community involvement process
- 1.5 Until Dudley's overarching SCI is approved, each Supplementary Planning Document needs to be accompanied by its own SCI. This SCI is therefore specifically for the Nature Conservation and Historic Environment Supplementary Planning Documents.
- 1.6 The aim of this document is to set out how individuals, groups and organisations are to be consulted with respect to the Nature Conservation and Historic Environment Supplementary Planning Documents.

2. Why will community involvement be sought?

- 2.1 Planning Policy Statement 12 clearly sets out the government's objectives for community involvement in planning. Planning authorities should involve communities early and throughout the production of Local Development Documents including Supplementary Planning Documents (Planning Policy Statement 12, paragraphs 3.2 and 3.3):
- 2.2 This requirement is reflected in the Councils overall Statement of Community Involvement:
"Community involvement is one of the cornerstones of the planning process. Without this engagement, planning would lose its focus. Dudley Council needs the opinions of its residents, businesses and partners in order to be able to plan for the future development of the Borough in a positive way which is of benefit to everyone."
- 2.3 *Community involvement is important for planning purposes because:*
 - *It strengthens local democracy*
 - *It strengthens the decision making process*

- *It influences the policy making process*
 - *It strengthens the evidence base that planning policy is based on*
- 2.4 *In short, everybody benefits from effective community involvement: local businesses, community groups, interest groups, individuals and organisations. This is why Dudley Council is committed to ensuring that such involvement takes place in the best way possible.*
(Dudley MBC draft Statement of Community Involvement 2005)
- 2.5 At Dudley Council we want to ensure that the planning process is open and democratic. It is our aim to take on board people's views and to use these views to directly influence our procedures and the wider policy making process. Nature conservation and historic environment are issues affecting all sections of the community. We want to ensure that Dudley's rich natural and historic heritage prospers and continues to benefit current and future generations.
- 2.6 Through the community involvement process the potential users of the SPDs and members of the community can help us to formulate policy guidance for the Borough that will enable us to ensure that our natural and historic heritage is given due weight and consideration in all planning decisions in an open and accountable way. We wish to create a document that is clear and understandable, that is usable by all sectors of the community and that will aid in interpreting and applying Development Plan policies. This can be a challenge when guidance refers to technical subjects and complex policy issues. Potential users of the Supplementary Planning Documents (SPDs) can help us create final documents that meet these objectives of clarity and usability while continuing to reflect Development Plan policy.

3. The Nature Conservation and Historic Environment Supplementary Planning Documents and how they relate to other documents

- 3.1 The Nature Conservation Supplementary Planning Document and Historic Environment Supplementary Planning Document are two of the new documents to be produced under the new planning system. Their aim is to ensure that any development that takes place takes into account nature conservation and historic environment issues in line with adopted Development Plan policies. The Supplementary Planning Documents must be related to, and in accordance with, Development Plan policies.
- 3.2 The SPDs expand on policy by providing detailed guidance on the information that is required to accompany planning applications and the measures required to ensure that new development and redevelopment meets nature conservation and historic environment policy requirements.

- 3.3 As the Nature Conservation and Historic Environment SPDs do not have full Development Plan status they are not required to go through all of the procedures required for Development Plan documents. However, they will still be subject to community consultation and Sustainability Appraisal.

4. Links to the Community Strategy

- 4.1 The aim of the Community Strategy, “Dudley Borough Challenge” is to set out a vision for a prosperous and attractive Borough. Dudley Borough Challenge addresses six key themes which together contribute towards a ‘Stronger Communities’ overall vision:

- Creating a Prosperous Borough
- Promoting a Sense of Well Being and Good Health for Everyone
- Celebrating our heritage and the diversity of local culture
- Safeguarding and Improving the Environment
- Promoting Individual and Community Learning
- Making Dudley a Safe and Peaceful Place to live

- 4.2 The Nature Conservation and Historic Environment Supplementary Planning Documents (SPDs) will contribute towards achieving these aims, and are key to safeguarding and improving the environment through the development control system.

- 4.3 The Dudley Borough Challenge lists several areas of work that are of particular importance in terms of nature conservation:

- *Improving the Borough’s designated nature conservation sites, making them safer and protect them from misuse*
- *Contributing to the objectives and targets of the UK and Birmingham and Black Country Biodiversity Action Plans (to reverse the trend of loss of some of our familiar wildlife) and the proposed Black Country Geodiversity Action Plan.*
- *Increasing our area of local nature reserves to meet and exceed national targets*

(Dudley Borough Challenge, 2005)

- 4.4 The Community Strategy also identifies ‘Celebrating our heritage and local cultural life’ as a key priority. The Strategy states that ‘Our vision is to build upon the real sense of pride, respect and belonging that stems from living in the Borough, by celebrating the physical heritage and varied cultural life of its people and enhancing its many leisure opportunities.’ Clearly the historic environment has a major a role here.

- 4.5 The Strategy says that *'By celebrating the unique heritage of the Borough, the feelings of pride in local history and local people we can better appreciate peoples' differences without losing sight of our shared aspirations.'*
- 4.6 It is also an aim of the Community Strategy to conserve local distinctiveness and Policy HE1 supports this objective. The aim of this policy is to preserve the historic and natural environment and give a context to local distinctiveness. The aim is also to use historic buildings and archaeology as a learning resource to improve the quality of life.
- 4.7 The Strategy stresses the importance of the need to conserve and enhance Dudley's rich heritage. In terms of the Strategy vision, the historic environment has the potential to contribute to people taking an interest in where they live and having a sense of belonging. It also contributes towards people having a pride in their environment.
- 4.8 The Strategy recognises that the Borough possesses many buildings of historic interest set within significant areas of townscape and landscape. It will be the role of the Historic Environment SPD to safeguard those buildings that have heritage value.
- 4.9 Clearly therefore it can be seen that the Nature Conservation and Historic Environment SPDs will have a key role in supporting the work of the Community Strategy.

5. Work undertaken so far

- 5.1 Drafting of the Nature Conservation and Historic Environment SPDs was commenced in 1999 to accompany preparation of the First Deposit draft of the recently adopted Development Plan (October 2005). Since that time the SPDs have been updated to take account of revisions to the Development Plan prior to adoption, new Government Guidance and developing best practice. During the time period 1999-2005 they have been widely used as informal guidance for development control. This experience has acted as an ongoing consultation mechanism and has been invaluable in informing the formal consultation draft of the Supplementary Planning Documents (SPDs). The draft Nature Conservation SPD has also been through initial stakeholder consultation involving the specialist nature conservation sector.

6. When will community involvement be sought?

- 6.1 The key stages in the preparation of the Nature Conservation and Historic Environment Supplementary Planning Documents are as follows:

Evidence gathering, first draft and stakeholder consultation	Up to December 2005
Public Participation	Late February to end of March 2006
Representations & finalise SPD	April-May 2006
Adoption	By July 2006

These dates may be subject to change

The formal community involvement process is scheduled to begin in late February 2006 and will last for six weeks.

7. How will community involvement be sought?

- 7.1 The scope and methodology of the community involvement process has been identified in line with the Council's draft Statement of Community Involvement (SCI) and is found in the table below. This process has identified who should be consulted and how this consultation should be carried out. Much of the evidence gathering and SPD drafting work was carried out prior to the Planning and Compulsory Purchase Act 2004 and the commencement of the new planning system. Despite this, it is felt that the stakeholder consultation that took place during this process means that this stage of SPD preparation was in accordance with draft SCI proposals. Due to the detailed and technical nature of these SPDs, consultation focuses on key stakeholders – potential users of the SPDs and special interest groups involved in nature conservation and the historic environment. At the same time opportunities for members of the public to comment will be provided through press publicity, the Council's website, and the placing of documents on deposit in Council offices and public libraries.
- 7.2 The following methods have been selected to meet the specific circumstances and context of the Nature Conservation and Historic Environment Supplementary Planning Documents.

Table 1 Consultation process

Type of Involvement	Details of Involvement
Evidence gathering stage Stakeholder consultation of draft SPD February 2000 to December 2005, iterative process involving revisions and updates	Nature Conservation SPD - Birmingham and Black Country Local Authority ecologists and planning officers dealing with ecology Black Country Geological Society Birmingham & Black Country Wildlife Trust English Nature

Type of Involvement	Details of Involvement
Evidence gathering stage Used as informal planning guidance in development control; informal feedback from this process used to inform revisions	Nature Conservation SPD used as informal guidance by Development Control planning officers, ecological consultants, applicants and agents
Production Stage Document available for inspection at local planning authority offices during set consultation period. Public notice in local newspapers Notices put up in Council offices to highlight consultation. Reference copies for public inspection available at all main Dudley Libraries. Internet- Dudley MBC website	Receptions at Council offices, 3 St James's Road, Dudley and Council offices at Mary Stevens Park, Stourbridge. Documents to include: - Draft Supplementary Planning Document - Draft Sustainability Appraisal - Screening Statement - Statement of Community Involvement (SCI) - Copies of Response Form
Production Stage Press Release	Press release to local media at beginning of consultation period Will cover – what the SPD is about; why you should respond, where to find consultation documents; consultation time period; how to respond
Production Stage Covering letter and SPD documents to statutory bodies	The letter will summarise what SPD is about and inform of consultation process and availability of documents. Statutory bodies will receive full copies of all documents.
Production Stage Letter with brief summary of SPDs, details of consultation process and availability of documents to other consultees – see list	A list of those to whom the Nature Conservation SPD and the Historic Environment SPD consultation letter and response form have been sent can be found in Appendix 1.

8. Resources

- 8.1 The main source of resources for the Nature Conservation SPD will be Dudley Council's Nature Conservation Officer supported by members of the Planning Policy Team and the Keeper of Geology. Resources for the Historic Environment SPD will be the Historic Environment team.

9. Stakeholders

- 9.1** Whilst contributions from all individuals and groups will be welcome, the following groups' involvement will be particularly crucial as they are statutory consultees and/or potential users of the Supplementary Planning Documents. A list of consultees is found in section 11 below.

9.2 Statutory Consultees

Statutory consultees are those agencies and organisations that the Council is required to involve as a result of central government guidance. Part of their role is to ensure the Supplementary Planning Documents are in accordance with Government guidance.

9.3 Neighbouring local authorities

Neighbouring local authorities have a valuable role to play in identifying sub-regional priorities and strategic considerations as well as bringing considerable experience to the process. They will also have an understanding of how the Nature Conservation and Historic Environment SPDs will impact on the wider region.

The ecological advisors for Birmingham and the other Black Country local authorities have been active consultees in the development of the Nature Conservation SPD and some have contributed towards the consultation draft.

9.4 Conservation interest groups

National, regional and local nature conservation organisations and historical and archaeological groups have an important role in contributing to the Borough's rich heritage. Many are involved in the development control process as consultees or respondents, others possess valuable local knowledge.

9.5 Ecological consultants and historic environment consultation contractors

These are the people who need to be able to interpret and use the Supplementary Planning Documents. They possess considerable ecological and historic environment expertise and often a familiarity with the planning system. Their input will be important in ensuring the SPDs are focussed, relevant and useable. Ecological and archaeological consultants who work locally have been consulted.

9.6 Planning consultants

Planning consultants are also key potential users of the SPD and will need to be able to understand the technical aspects and be able to relate the SPDs to particular sites and circumstances and provide

advice to clients. They will need to be able to clearly understand the SPD requirements. Planning consultants will have a valuable role to play in ensuring the SPD is clear and usable.

9.7 House builders, extractive companies, landowners and other developers

Those with an interest in developing land will be key users of the Nature Conservation and Historic Environment SPDs and therefore have a key consultative role to play in ensuring that the SPDs are clear, relevant and useable in helping them to meet Development Plan policy requirements.

10. Reporting Back

- 10.1 Consultees need to feel that we have taken account of their comments and that these comments have had an influence on our policy making processes. Reporting back will be an important element in achieving this.
- 10.2 We aim to report back in a timely manner. We will let you know the results of the community involvement process and also how that process has influenced our policy making procedures. The results of the consultation summarising representations and explaining how they were dealt with is given below.

11. Results of the consultation process

- 11.1 The two SPDs went out for consultation for a six week period from 20th February to 31st March 2006. The documents and accompanying response forms were made available in accordance with the provisions set out in Table 1 above – namely at Council offices, all main libraries in Dudley and the Council's website. Public notices were placed in the Borough's newspapers namely the Express and Star, Dudley News, Halesowen News and Stourbridge News. A press release was issued to the local media at the beginning of the consultation period giving details of what the documents were about, where they could be found and how comments could be made.
- 11.2 The consultees listed in Appendix 1 were notified and statutory bodies received a copy of all the documents. All Councillors were notified as were officers in local authorities and other organisations dealing directly with nature conservation and the historic environment.
- 11.3 The overall response rate was low with only 13 respondents on the Nature Conservation SPD and 9 on the Historic Environment SPD. There was some duplication in respondents between the two SPDs. The lists of all the respondents, their comments and the Council's

response to them together with any subsequent text changes are to be found in Appendix 2 on Nature Conservation and in Appendix 3 on the Historic Environment. A brief resume of these comments as they relate to each of the SPDs is as follows.

- 11.4 The Nature Conservation SPD was well received with no serious criticism aimed at its contents. Constructive comments were made by a series of experts in their field such as English Nature, the Birmingham and Black Country Wildlife Trust, Birmingham and Black Country Bat Group and Butterfly Conservation and the majority of these comments have been acknowledged in the amended text to the SPD.
- 11.5 The Historic Environment SPD also received overall support with appreciative comments received. A number of text amendments have been made to take account of comments where appropriate..
- 11.6 The Nature Conservation SPD was put forward as Good Practice guidance on geodiversity by the Office of the Deputy Prime Minister in March 2006. In addition, Dudley's Landscape and Townscape Study has been chosen by the Countryside Agency to be included in a "Character Guide" as a best practice case study for the West Midlands
- 11.7 The SPDs with the amended text are to be put before Cabinet in September for formal adoption. They will be monitored as part of the Council's Annual Monitoring Report to measure whether they are being implemented successfully.

APPENDIX 1: LIST OF CONSULTEES

Statutory consultees

Advantage West Midlands
Birmingham and the Black Country Strategic Health Authority
BT Cellnet
The Countryside Agency
Defra
Dolphin Telecommunications
Environment Agency
English Heritage
English Nature
Government Office for the West Midlands
The Historic Buildings and Monuments Commission for England
Highways Agency
O2 UK Ltd
Orange Personal Communication Services Ltd
Severn Trent Water plc
South Staffordshire Water plc
Strategic Rail Authority
T-Mobile (UK) Ltd
Transco
Vodafone Ltd
West Midlands Regional Assembly

Local Authorities (also statutory consultees)

Birmingham City Council
Bromsgrove District Council
Hagley Parish Council
Himley Parish Council
Hunington Parish Council
Kinver Parish Council
Sandwell Metropolitan Borough Council
South Staffordshire Council
Staffordshire County Council
Swindon Parish Council
Walsall Metropolitan Borough Council
Wolverhampton City Council
Wombourne Parish Council
Worcestershire County Council
Wyre Forest District Council

Non-statutory consultees

Organisations and Interest Groups

Ancient Monuments Society
Advantage West Midlands
Association of Local Government Ecologists
Birmingham & Black Country Bat Group
Birmingham & Black Country Biodiversity Steering Group
Birmingham & Black Country Mammal Group
Black Country Society
Black Country Society Industrial Archaeology Group
British Geological Survey
British Waterways
Bumble Hole Conservation Group
Butterfly Conservation
Campaign for the Protection of Rural England (CPRE)
Commission for Architecture and the Built Environment (CABE)
Council for British Archaeology
Dudley Biodiversity Working Group
Dudley Historical and Archaeological Society
The Earls High School
Field Archaeology Unit, University of Birmingham
Forestry Commission
Friends of the Black Country Museum
Friends of Cotwall End Valley
The Friends of Dudley Castle
Friends of Turls Hill and Swanbrook Valley
Garden History Society
Georgian Group
Glynne Primary school
Groundwork Black Country
Hagley Historical and Field Society
Halesowen History Society
Halesowen Wildlife Group
Kingswinford and District Historical Society
The Local Access Forum
Pensnett Wildlife Group
Regional Assembly
Royal Society for the Protection of Birds
Sedgley Local History Society
Society for the Protection of Ancient Buildings
Stourbridge Historical and Archaeological Society
Twentieth Century Society
UK RIGS Association
Victorian Society
West Midlands Bird Club
West Midlands Historic Buildings Trust
Wildlife Trust for Birmingham & the Black Country
Wordsley History Society

Ecological, Environmental and Planning Consultants

ARUP Planning Consultants
Atkins Consultants Ltd (Birmingham)
Barton Willmore Planning Partnership (Solihull)
Stephen R. Bell Planning & Building Design Consultants
Christopher Betts Associates
BK The Property Assets Consultancy (Wolverhampton)
Bowles, Whittick & Young (Dudley)
Bruton Knowles Planning Consultants
Cascade Consulting
John Challenor Associates
David Lock Associates (Milton Keynes)
DG Countryside
DTZ Pida Consulting (Birmingham)
Susie Duke Consultant Ecologist
EA Design
Ecoline
Ecotec
Ecotech
EMEC
Gould Singleton Architects
GVA Grimley (Birmingham)
Hellier Parker Ecological Services
Johnson, Poole & Bloomer Land Consultants
Halcrow Group Limited
Martin Holland Landscape design Consultant
Landcare Associates
LDA Design
Elizabeth Mackay Consultant Ecologist
Marishal Thompson & Co
Middlemarch Environmental
Moore Environment
Mott MacDonald (Birmingham)
Nathaniel Lichfield & partners
Nicol Jones & Lomax
Roger Tym & Partners (Leicester)
RPS Design
Robert Stebbings Consultancy
SLR Consulting Ltd
Stansgate Planning Consultants
Tyler-Parkes Partnership Ltd (Birmingham)
Wardell Armstrong Ltd
White Young Green Planning Consultants (Midlands)
Worcestershire Wildlife Consultancy

House builders, extractive companies, landowners and other developers

A & J Mucklow plc
Baggeridge Brick plc
Barratt Homes (West Midlands) Ltd
Bellway Homes (West Midlands) Ltd
Bennett R & Co. Ltd, Dudley (Building Contractors/ Developers)
Blackbrook Valley Developers (Dudley) Ltd
Bovis Homes (Central Region)
Bryant Homes Central (West Midlands)
Centro
Conrad Kottler Estates Ltd
Cordwell Property plc
Cory Environmental (Central) Ltd
Countryside Properties Ltd
Countrywide Homes Ltd
Cox Homes Ltd
David Wilson Homes Ltd (West Midlands)
First City Ltd
George Wimpey (West Midlands) Ltd
House Builders Federation
JP Horgan Builders Ltd
Ideal Estates Ltd
Kendrick Homes Ltd
Kings Oak Homes (West Midlands)
Lattice Property
London & Cambridge Properties
Lovell Homes
Mar City Developments Ltd
Sir Robert McAlpine Ltd
Persimmon Homes (West Midlands) Ltd
Railtrack Plc (Property)
Redrow Homes (West Midlands) Limited
Revelan Group
Richardson Developments Ltd
Richborough Estates
St Modwen Developments
Second Site Property Holdings Ltd
Selbourne Homes Ltd
Taylor Woodrow plc
Trimpley Estates Ltd
Westbury Homes (Holdings) Ltd
Westfield plc
Wollaston Properties Ltd
Wrekin Construction plc

APPENDIX 2 – REPRESENTATIONS RECEIVED ON THE NATURE CONSERVATION SPD AND COUNCIL'S RESPONSE

Councillor David Sparks

Summary of comments	Council's Response	Council's Further Action
Queries raised at Cabinet. Appendix 1 section 1.2 - otters are rarely seen in Dudley.	Appendix 1 - 1.2 - Signs of otters have been recorded at a number of locations in Dudley and national guidance requires the protection of their habitat through the planning system.	No change.
Appendix 1 section 1.3 - reference to bats at Wrens Nest and Castle Hill	Appendix 1 - 1.3 -Text will be added to clarify the reference to bats at Wrens Nest and Castle Hill .	In Appendix 1 section 1.3 at the end of the paragraph "Local issues - Wrens Nest and Castle Hill Bat Populations" add "This means ensuring location and layout of development, landscaping and lighting are designed to avoid undue impacts on both feeding habitat and corridors of movement."
Appendix 1 section 2.1.3 - the wording "The first pair bred in Birmingham in 1943" is not a good use of words.	Appendix 1 - 2.1.3 -The reference to the wording on the black redstart is noted and this will be amended.	In paragraph 2.1.3 of Appendix 1 amend wording in line 6 to read "Black redstarts were first recorded breeding in Birmingham in 1943."

Birmingham & Black Country Bat Group

Summary of comments	Council's Response	Council's Further Action
Optimum times for bat survey excludes October when bats may change behaviour significantly including habitat use to take part in mating behaviour.	The reference to bat surveys is noted and October will be included in Table 3.	Amend optimum survey time for bats in Table 3 to include October under "Breeding".

Summary of comments	Council's Response	Council's Further Action
Survey criteria insufficient in Appendix 1- should include older buildings (100+years), large garden areas or allotments; include structures such as canal bridges and tunnels. Need to be careful of modern housing with hanging tiles and decorative boarding	Reference is already made to large gardens and canals but allotments will be added in bullet point 3. A further bullet point will be added to refer to demolition of older buildings (100 years +) and more modern buildings.	Add "and allotments" after "mature gardens" in bullet point 3 on page 8 of Appendix 1 under "Information Requirements and Survey Standards". Add further bullet point to read "If demolition of older buildings, particularly those over 100 years, is proposed. Bats can also be present in newer properties, especially those with hanging tiles and hanging decorative boarding. If demolition is proposed, and one or more of the criteria listed is met, a survey of the property will be required."

Hunington Parish Council

Summary of comments	Council's Response	Council's Further Action
The documents cover very important parts of the maintenance and development of the Borough. If these concepts can be delivered they can only improve the area to the advantage of all the people who live and work in the area	Noted.	None.

Barratt West Midlands

Summary of comments	Council's Response	Council's Further Action
Para 1.5. - supports commitment to pre-application discussions.	Para 1.5 - support is noted.	None

Summary of comments	Council's Response	Council's Further Action
Para 2.1.4- supports the advocated approach of recognising the need to encourage development and working with developers as "partners" with development and regeneration	Para 2.1.4 - support is noted.	None.
Para 2.4.8- support wording regarding the potential of new development to enhance biodiversity or to compensate for any loss.	Para 2.4.8 - support is noted.	None.
Para 3.1.4- include a reference to "development in appropriate cases being supported on part of a site acting as a suitable catalyst for mitigation and protection through positive management of the important nature conservation areas remaining on the site." This would be consistent with paragraphs 2.1.4 and 2.4.8 and policy DD10 of the adopted UDP.	Para 3.1.4 - this paragraph refers to ancient woodland and traditional grasslands, both finite resources, and the Council would seek to protect these wherever possible. The suggested wording would weaken the Council' stance.	Para 3.1.4 -no change
Para 3.2.7- delete last sentence as too restrictive and insert new wording that translocation should be available as an option where "on balance it is considered to be appropriate"	Para 3.2.7 - it is felt that the suggested wording would be contrary to English Nature's published guidelines on translocations. The text is being amended to include "as a last resort" on the recommendation of English Nature.	Para 3.2.7 - no change
Para 4.2.2 (last bullet point) - wording not clear but same comment as 3.2.7 regarding added text.	Para 4.2.2 - as 3.2.7.	Para 4.2.2 - no change.
Para 6.4.3 - support for positive approach to development whereby there is potential to pursue suitable mitigation and habitat creation in conjunction with valuable development proposals.	Para 6.4.3 - support is noted.	None.
Chapters 3 & 6 - the Council should consider the relationship between the two sections to avoid unnecessary duplication of material. It would seem	The Council notes the comments regarding Chapters 3 and 6. However it is felt that the document is well structured and follows the	None.

Summary of comments	Council's Response	Council's Further Action
<p>sensible that section 6 contains all the "policy" material to be found in the SPD with the preceding sections forming explanatory and informative background information.</p> <p>Recommend that the relevant UDP adopted policies are reproduced as the first appendix for ease of reference. Further, a plan identifying each of the designated sites with an explanation of the basis on which they have been designated should be considered (or a separate report with this information published and available on Council website</p>	<p>format of the Adopted UDP and does not duplicate material.</p> <p>The reference to reproducing the relevant adopted UDP policies on nature conservation is noted. The policies are listed in section 2.4 of the document but a full text of the policies will be reproduced in an appendix of the final SPD document. The designated sites will be identified in the UDP Proposals Map which will be available in both printed form and on the Council's website.</p>	<p>Appendix - include the Nature Conservation policies of the adopted UDP in new Appendix 6.</p>

Butterfly Conservation

Summary of comments	Council's Response	Council's Further Action
<p>Para 2.1.3 - it is not just the green environments that are important but Brownfield sites, so perhaps replace the word "green" with "natural".</p> <p>Para 2.2.1 - also mention here that geological exposures are also good for rare and vulnerable flora and fauna.</p> <p>Para 2.2.2 - fully support this paragraph. Good to see the acknowledgement of the biodiversity value of previously developed land.</p>	<p>Para 2.1.3 - this is noted and text will be amended accordingly.</p> <p>Para 2.2.1 - this is noted and text will be amended accordingly.</p> <p>Para 2.2.2 - support is noted.</p>	<p>Para 2.1.3 - replace "green" with "natural".</p> <p>Para 2.2.1 - add sentence to end of paragraph "Geological exposures are also good for rare and vulnerable flora and fauna".</p> <p>None.</p>

Summary of comments	Council's Response	Council's Further Action
Para 2.2.4 - pleased to see the acknowledgement of the canal network as importance for biodiversity.	Para 2.2.4 - support is noted.	None.
Para 2.3.2 - support for the reference from PPS9 of the need for biodiversity protection on previously developed land.	Para 2.3.2 - support is noted.	None.
Para 2.3.3 - sentence relating to ecological survey does not make sense. BC would support something along the lines of "Ecological surveys should be undertaken prior to planning consent and not as a planning condition".	Para 2.3.3 - there is a typographical error and this will be amended to include further text from ODPM Circular 06/2005.	Para 2.3.3 - amend text to read "and that the need to ensure ecological surveys are carried out should only be left to coverage under planning conditions in exceptional circumstances".
Para 2.4.1 - strong support for the concept of stepping stones and this equally applies to brownfield habitats.	Para 2.4.1 - support is noted.	None.
Para 2.4.8 - support the enhancing of the Borough's biodiversity within development. However, it should be pointed out that in some instances compensation will not be justified, where networks of surrounding habitat and meta-population could be destroyed by the loss of one particular piece of habitat or where habitat are not readily recreated.	Para 2.4.8 - noted, amend text accordingly.	Para 2.4.8 - add text to end of paragraph to read "However in some instances compensation will not be justified such as where networks of surrounding habitat and meta-population could be destroyed by the loss of one particular piece of habitat or where habitat are not readily recreated."
Para 3.1.4 - strong support for this statement regarding the protection of previously developed land.	Para 3.1.4 - support is noted.	None.
Para 3.2.3 - can Butterfly Conservation go onto the records contacts list?	Para 3.2.3 - Butterfly Conservation will be added to list of contacts and in Appendix 5.	Para 3.2.3 - add "Butterfly Conservation for all searches" to list in text. and to Appendix 5.
Para 3.2.5 - strongly supports reference to considering implications of on-going management requirements beyond the development phase.	Para 3.2.5 - support is noted.	None.

Summary of comments	Council's Response	Council's Further Action
<p>Table 3 - since there are 3 Lepidoptera LBAP species which could be found In Dudley, please can optimum time for species survey be added to this table? (Dates given for presence and habitat surveys).</p> <p>Para 4.3.1 - in point 1 perhaps highlight here that some unusual sites including previously developed land can be important for rare species.</p> <p>Section 6 - general support for the principles of maximising biodiversity opportunities within new developments and early pre-application advice. BC would be happy to help with early advice.</p> <p>Para 6.3.4 - bare ground is an important component of open grassland habitat for many brownfield Lepidoptera and invertebrates.</p>	<p>Table 3 - add details of optimum times of survey for Lepidoptera as recommended.</p> <p>Para 4.3.1 - noted and amend text.</p> <p>Section 6 - support is noted.</p> <p>Para 6.3.4 - noted and amend text.</p>	<p>Table 3 - add "Lepidoptera - Presence April - September, Habitat April - September."</p> <p>Para 4.3.1 - bullet point 1 - after "by the development" add text to read "Previously developed land can be important for rare species".</p> <p>None.</p> <p>Para 6.3.4 - add "bare ground" to text after "and scrub".</p>

Environment Agency

Summary of comments	Council's Response	Council's Further Action
<p>We welcome the production of the SPD to reinforce and expand on the DPDs, and concur with the view that development provides opportunities for betterment and for enhancing the environment. The opportunities provided by mitigation need to be</p>		

Summary of comments	Council's Response	Council's Further Action
<p>emphasised. We acknowledge that the SPD complies with recognised nature conservation policies and provides appropriate guidance on how the authority expects nature conservation to be taken into account in the development control process.</p> <p>Section 6 - the inclusion of Sustainable Urban Drainage (SUDs) principles at the early stages of developments can make a significant contribution to enhancing the biodiversity value of new developments.</p> <p>Para 6.5.6 - it is recommended that the SPD should where appropriate actively promote the de-culverting of watercourses and wherever practical to have culverted watercourses restored to open channel. An 8 metre strip on either side of a watercourse is seen as a viable minimum to be protected from development.</p>	<p>The reference to Sustainable Urban Drainage is noted and this will be included in the text. in paragraph 3.2.6.</p> <p>Similarly in 6.5.6 Ponds, Wetlands and Watercourses where reference is made to the encouragement of uncovering watercourses, the text will be strengthened to state that the Council will actively promote the de-culverting of watercourses and encourage the restoration of open channels wherever practical and insert text regarding the requirement of an eight metre strip on either side to be protected from development.</p>	<p>Para 3.2.6 - add new text at the end of the paragraph to read "The inclusion of Sustainable Urban Drainage (SUDs) principles at the early stages of development can make a significant contribution to enhancing the biodiversity value of new developments."</p> <p>Para 6.5.6 - Ponds, Wetlands and Watercourses amend text to read "Where this has happened, the Council will actively promote their de-culverting and encourage the restoration of open channels wherever practical in order to bring them into the overall nature conservation provision of the site". Add new text to read "The Environment Agency recommend that an eight metre strip of land on either side of the watercourse is seen as a viable minimum to be protected from development".</p>

Highways Agency

Summary of comments	Council's Response	Council's Further Action
<p>Whilst the SPD has no direct impact on the trunk roads in the Borough, we consider that they will have an influence on development and on development schemes on the Trunk Road network that may come</p>	<p>The respondent's comments are noted.</p>	<p>No amendments to text.</p>

Summary of comments	Council's Response	Council's Further Action
forward in the future. With this in mind it is important that the Highways Agency are consulted at the earliest opportunity when formulating your development proposals, particularly when adjacent to or affecting an access to a Trunk Road.		

Countryside Agency

Summary of comments	Council's Response	Council's Further Action
No formal response or comments made	None.	None.

Sandwell MBC

Summary of comments	Council's Response	Council's Further Action
Para 2.4.3 - makes the important point that most of the Borough's natural heritage is outside statutory protection but that in terms of biodiversity for such a Borough they are equally important.	Para 2.4.3 - comments noted.	None.
Para 2.4.9 - good to see watercourses included. Has been promoted by the Chartered Institute of Water Environmental Management.	Para 2.4.9 - comments noted.	None.
Para 3.2.2 - mentions EIAs - for those not familiar with the term they could be signposted to where additional information is available.	Para 3.2.2. - amend text to make clearer.	Para 3.2.2 - amend text in line 2 to read "Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999."

Summary of comments	Council's Response	Council's Further Action
Para 3.2.11 - the impact of imported soil often seems to be overlooked. Would like to see stronger wording re the invasive species if possible.	Para 3.2.11 - noted, additional text will be added to cover this point.	Para 3.2.11 - amend text in line 4 after "introduced" to read "and any imported soil will need to be carefully sourced."
Para 3.2.12 - tables very useful for the non ecologist / planner / developer.	Para 3.2.12 - comments noted.	None.
Para 4.3.1 - checklist useful, ensures good practice but how would an officer know at outset if protected species were likely to be present?	Para 4.3.1 - officers and developers would be referred to the criteria set out in the detailed species guidance set out in Appendix 1 of the SPD.	None.

Wildlife Trust for Birmingham & Black Country

Summary of comments	Council's Response	Council's Further Action
<p>The Wildlife Trust would like to confirm its fullest support for the SPD. It is long overdue, work having started in 1999 and represents a major step forward for biodiversity protection management, enhancement and restoration. It is of Black Country significance. We look forward to helping Dudley Council and its partners implement the document for the benefit of all. The following comments are made on the SPD.</p> <p>Para 2.1.1 - should specifically identify the UK Biodiversity Action Plan, the Birmingham and Black Country Biodiversity Action Plan and the emerging work relating to the Black Country Study and the Black Country Study Urban Park concept</p>	<p>The Wildlife Trust's support for the SPD is welcomed.</p> <p>Para 2.1.1- noted. These will be added to the list in paragraph 2.1.1.</p>	<p>Para 2.1.1- add "The Black Country Study", "The Black Country Study Urban Park concept", "UK Biodiversity Action Plan" and "Birmingham and Black Country Biodiversity Action Plan" to the list of bullet points.</p>

Summary of comments	Council's Response	Council's Further Action
Section 2.2 should provide basic information about the nature conservation/biodiversity resource within Dudley and given its Black Country context. This would demonstrate how important Dudley's resource is to the Black Country.	Para 2.2 - the Council believes that this point is adequately covered in the text.	Para 2.2 - no further change.
Section 2.3 should identify the EU Habitats Directive and the associated Habitats Regulations (1994) since these are also part of the national context.	Para 2.3 - noted, add text to include reference to the Directives and Regulations in new paragraph 2.3.5 and amend subsequent paragraph numbers accordingly.	Para 2.3 - add new paragraph 2.3.5 to read "PPS9 and Circular 06/2005 complement other national and international guidance such as the Conservation (Natural Habitats &c.) Regulations 1994, the Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000, and the EC Directives on the conservation of wild birds (1979) and of natural habitats and of wild fauna and flora (1972)." Para 2.3.5 - renumber as 2.3.6 Para 2.3.6 - renumber as 2.3.7.
Para 2.4.2 and Table 1 - the SAC site has been formally designated as such and text should be amended.	Para 2.4.2 - noted, text to be amended.	Para 2.4.2 and Table 1 - amend text to read "SAC" not "cSAC"
Para 2.4.6 - PPG9 should be PPS9.	Para 2.4.6 - noted, this was a typing error.	Para 2.4.6 - amend text to read PPS9.
Para 3.1.2 - would benefit from a final sentence stressing that biodiversity is an important component of environmental quality and that good environmental quality is a clear determinant of a good quality of life.	Para 3.1.2 - noted, wording will be added as suggested.	Para 3.1.2 - add to end of paragraph "Biodiversity is an important component of environmental quality and good environmental quality is a clear determinant of a good quality of life"
Para 4.1.1 - should also identify the EU Habitats Directive as a key piece of legislative protection for wildlife in the UK. It is from this primary legislation that the Habitats Regulations (1994) are derived.	Para 4.1.1. - noted, add text.	Para 4.1.1 - add "derived from the EU Habitats Directive" in line 2 after "Habitats Regulations".
Para 4.2.1 - should identify a cross reference to para	Para 4.2.1 - add cross reference to paragraph	Para 4.2.1 - add "(see paragraph 3.2.3)" after

Summary of comments	Council's Response	Council's Further Action
<p>3.2.3 and should identify that EcoRecord is the ecological database for the Black Country and Birmingham and is not as referred to in para 4.2.1.</p> <p>Para 4.3.1 - should explain that the same information about the wildlife species concerned is needed to determine the planning application and to form the protected species licence application. The eventual need for a protected species licence should be identified prior to submission of a planning application, as subsequently explained in section 4.4. European Protected Species and badgers, the latter covered by separate legislation, are those where there will be licensing issues.</p> <p>Section 5 - no reference to the emerging Black Country Geodiversity Action Plan (BCGAP). Conditions and planning obligations can play a clear role to assist the Council and others to undertake action to implement the BCGAP. Dudley's geological resource should be considered in this context.</p> <p>Para 6.1.1. Should also draw attention to Government Circular 06/2005 since it is this circular which contains much of the detail not included in PPS9.</p> <p>Para 6.5.6 - otters and kingfishers are not B&BCBAP Priority Species though otters are UKBAP Priority Species. Water voles are both UKBAP and B&BCBAP Priority Species.</p>	<p>3.2.3.</p> <p>Para 4.3.1 - noted, add text to bullet point 2.</p> <p>Section 5 - noted, additional text will be inserted to acknowledge the emerging Black Country Geodiversity Action Plan.</p> <p>Para 6.1.1 - noted although reference is made to the circular in paragraph 2.3.3. Text will be added in 6.1.1.</p> <p>Para 6.5.6 - noted. To avoid confusion the specific species referred to in the text will be deleted.</p>	<p>"records centre" in line 1.</p> <p>Para 4.3.1 - add in parentheses at end of bullet point 2 "This information will also be needed when applying for a protected species licence."</p> <p>Para 5.1.1 - add text to end of paragraph to read "The Black Country Geodiversity Action Plan is being produced by a partnership comprising the four Black Country authorities, the Black Country Geological Society, the Wildlife Trusts, English Nature and the Black Country Consortium. The aim is to promote and make accessible the wealth of geological and related cultural and heritage features of the sub-region."</p> <p>Para 6.1.1 - add text "and the accompanying Circular 06/2005 Biodiversity and Geological Conservation - Statutory obligations and their impact within the planning system" after "Conservation" on line 2.</p> <p>Para 6.5.6 - delete "such as otter, kingfisher and water vole" from the text on "Ponds, Wetlands and Watercourses" on page 31.</p>

Summary of comments	Council's Response	Council's Further Action
<p>Accessible Natural Greenspace and Local Nature Reserves are now widely accepted biodiversity / nature conservation provisions with well developed national standards. We are disappointed that the development of ANG and LNR provision has not been explained or encouraged within the draft SPD. In our view, this should be rectified. We feel that guidance for council officers and members, developers and local communities on these provisions is warranted in Section 6. Planning conditions, obligations and management agreements have roles to play in securing these provisions for Dudley's communities.</p>	<p>This is noted but the Council does not consider that further explanation is needed.</p>	<p>None.</p>
<p>There is no indication of a monitoring and review process - we feel that it is appropriate to outline such a process either at the beginning or at the end of the document.</p>	<p>This will be included in the Council's Annual Monitoring Report to assess whether the SPD is operating successfully.</p>	<p>None.</p>

English Nature

Summary of comments	Council's Response	Council's Further Action
Overall English Nature supports the draft document but has a number of comments and suggested amendments as follows: - Biodiversity Enhancement Areas require greater coverage and elaboration in the SPD to comply with RSS and Black Country Study.	Noted - reference is made to Biodiversity Enhancement Areas in paragraph 2.2.8. A further reference will be made in paragraph 3.2.5.	Para 3.2.5 – bullet point 5 – after “may provide” add “including towards the aims of any relevant Biodiversity Enhancement Areas”.
Para 2.4.6 - PPG9 should read PPS9.	Para 2.4.6 - noted, text will be amended accordingly.	Para 2.4.6 - amend "PPG9" to read "PPS9" in line 1
Table 1 under "status" the summary of protection policies detailed for cSACs, NNRs and SSSIs in column 3 is not fully complete and accurate and could be misleading if read out of context. It is suggested that this wording is omitted and replaced by a reference to where a full statement of protected site policies can be found. As well as cross referencing the UDP this could include a reference to para 8 of PPS9 which states the national policy on SSSIs.	Table 1 - following discussions with English Nature the comment has been withdrawn.	Table 1 - no change.
Para 3.1.3 1st bullet point - include reference to "aged" or "veteran trees" to comply with para 10 of PPS9.	Para 3.1.3 - noted, text will be amended accordingly in both instances.	Para 3.1.3 - add "aged or 'veteran' trees" to text after "ancient woodland".
Para 3.1.3 5th bullet point - suggest insertion of the text "networks of natural habitats" at the beginning to reflect wording of PPS9 para 12.	As above.	Para 3.1.3 - add "Networks of natural habitats:" at start of bullet point 5.
Para 3.2.1. and Table 1 - all references to cSAC should read SAC as status changed.	Para 3.2.1 - noted, text and table will be amended.	Para 3.2.1 and Table 1 - amend text to read "SAC" and not "cSAC".

Summary of comments	Council's Response	Council's Further Action
Para 3.2.7. - suggest insertion of the wording "as a last resort" at the end of the paragraph to strengthen the statement and bring it in line with English Nature's published guidelines on translocation.	Para 3.2.7 - noted, add wording as suggested.	Para 3.2.7 - add "as a last resort" to the end of the paragraph.
Para 3.2.9 - "are" should read "area" in line 2.	Para 3.2.9 - agreed, this is a typographical error.	Para 3.2.9 - amend "are" to "area" in line 2.
Para 4.2.1. - 1st bullet point rephrase to add clarity to lay person "To include obtaining relevant records from EcoRecord..."	Para 4.2.1 - noted, text will be added as suggested.	Para 4.2.1. - amend text in bullet point 1 to read. "To include obtaining relevant records from EcoRecord".
Para 4.2.2 - add "as a last resort" in asterisk text on page 17 to strengthen the statement in line with English Nature published mitigation guidelines.	Para 4.2.2.- noted, additional wording will be added.	Para 4.2.2 - add "as a last resort" to asterisk text after "should only be considered".
Para 5.5. - 2nd bullet point does not make sense.	Para 5.5 - agreed, amend text to 2nd bullet point.	Para 5.5 - amend second bullet point to read "recognise that information on all known important geological sites in the borough is held in the Geological Records centre at Dudley Museum and Art Gallery and this is the most useful source of immediately relevant information".
Para 5.5 - recommend that an additional bullet point is added along the lines "Recognise that national policy in PPS9 is that proposals should aim to maintain and enhance or restore or add to geological conservation interests".	Para 5.5 - agreed, extra bullet point added as suggested.	Para 5. 5 - additional bullet point 8 to read "recognise that the principle set out in national policy in PPS9 is that proposals should aim to maintain, and enhance, restore or add to geological conservation interests".

Council for British Archaeology West Midlands

Summary of comments	Council's Response	Council's Further Action
CBA West Midlands feels that the document should refer to the historic environment because of the close relationship between the "natural" and historic environment, and the potential impact of some of the measures suggested in the document on the historic environment.	The Council acknowledges that there is a close relationship between the natural and the historic environment and makes several references to the Borough's historic past, the canal network and its geological heritage. It is not felt that additional text is needed.	None.

Campaign to Protect Rural England

Summary of comments	Council's Response	Council's Further Action
Para 5.5 -bullet point 5 - it may be over-stressing the status of geological sites to say their preservation is the "Council's first priority".	Para 5.5 - this is noted and text in bullet point 5 will be amended to remove this ambiguity.	Para 5.5 bullet point 5 to read "recognise that where a proposed development identifies that a conflict with an existing geological site of designated quality and importance will occur, it shall be the Council's first priority to enter into early liaison about this development to seek alternative layouts of mitigation for the likely damage that may be caused to the designated feature. In the extreme example where no alternative layouts or acceptable mitigation are possible the development will be refused.

Summary of comments	Council's Response	Council's Further Action
<p>Para 5.5 - bullet point 7 - removal of an existing geological feature may (almost certainly) not be capable of replacement by a new or alternative feature.</p> <p>It would have been helpful to have given a little more practical guidance on methods of retaining nature conservation intended in new development, especially high-density, high site-coverage proposals.</p>	<p>Para 5.5 - bullet point 7 - the wording is ambiguous and will be amended.</p> <p>Para 5.5 - add new text in new bullet point 9 to direct people to good practice guidance set out by English Nature.</p>	<p>Para 5.5 bullet point 7 - amend wording to read "recognise that in the unlikely event that existing features cannot be accommodated then it will be necessary to create new geological features in alternative areas in agreement with the Keeper of Geology where geological conditions are equivalent or acceptable as mitigation for the feature to be compromised in the development."</p> <p>Para 5.5 -add text in new bullet point 9 to read "For practical examples of methods and typical considerations involved in conservation of geological sites the developer should refer to English Nature's 2006 publication ' Geological Conservation - a guide to good practice'. However each site will have its own characteristics and challenges and early consultation about the individual sites is essential."</p>

APPENDIX 3 REPRESENTATIONS TO HISTORIC ENVIRONMENT SPD AND COUNCIL'S RESPONSE

Councillor David Sparks

Summary of comments	Council's Response	Council's Further Action
<p>Queries raised at Cabinet.</p> <p>There is a lack of definition of watercourses important in the early industrial use of water power.</p>	<p>A new figure will be inserted showing significant streams and associated early industrial water power sites.</p>	<p>Insert new Figure as above.</p>
<p>The use of the term "fulling" on p. 18 requires explanation.</p>	<p>Text will be added to clarify the reference to fulling.</p>	<p>Amend text in 2nd paragraph page 18 for clarity to read: "...being converted from grinding corn and fulling (processing wool into cloth) for use as blast furnaces, forges and for other ironware processing activities, for example blade mills for sharpening edge tools".</p>
<p>There is a lack of clarity about population growth in 2nd paragraph on p. 18.</p>	<p>Text will be amended to make it clear the population of the Borough as a whole, not just Coseley, rose from 51-213k.</p>	<p>Amend 2nd paragraph on p. 18 to read: "The population of the Borough mirrored the industrial activity....."</p>
<p>Why "Coseley Corner" for the major character area here?</p>	<p>"Coseley Corner" was so named because Coseley occupies the top right hand corner of the Borough map and is in addition at the bottom corner of the adjacent Bilston/Bradley areas of the main South Staffordshire Coalfield whose wider Black Country character Coseley shares.</p>	<p>None required.</p>
<p>Language used at the top of p.19 is not understandable.</p>	<p>Text will be amended to clarify the wording used.</p>	<p>Amend first full sentence at top of p.19 to read: "From the 1950's onwards and up to date disused and derelict post-industrial land has also been utilised for a range of new economic purposes contributing to the Borough's ongoing vitality".</p>

Summary of comments	Council's Response	Council's Further Action
Concern over the use of the term "Township" in relation to eg Amblecote.	"Township" in the context of the Character Study does not refer to Urban Districts but to earlier sub-divisions of a Parish as depicted by 1840's Tithe Maps used in the Study.	6) None required.

Birmingham and Black Country Bat Group

Summary of comments	Council's Response	Council's Further Action
Bats are found in old buildings and this fact should be addressed.	The reference to bats is noted and their association with historic buildings will be referred to and the Nature Conservation SPD will also be amended to refer to surveys being required in respect of bats and the demolition of older buildings.	On page 11 of Historic Environment SPD under "Ecology" add "Particularly in relation to historic buildings bats are an important consideration and owners should be prepared to carry out survey work as appropriate. Guidance in this respect can be found in the Council's Nature Conservation SPD". On page 8 of Appendix 1 of Nature Conservation SPD under "Information Requirements and Survey Standards" add further bullet point to read "If demolition of older buildings, particularly those over 100 years, is proposed".

Hunington Parish Council

Summary of comments	Council's Response	Council's Further Action
A very clear document with well presented facts and conclusions. To be hoped that the	None.	None.

Summary of comments	Council's Response	Council's Further Action
character of the Borough can be protected whilst the area as a whole is able to grow in the 21st century.		

Barratts West Midlands

Summary of comments	Council's Response	Council's Further Action
Whole SPD not felt to be user friendly or clear and understandable and requiring careful proof reading in this respect.	Careful proof reading of the draft SPD has been undertaken and will be undertaken again prior to final SPD publication.	Careful proof reading of the SPD will be undertaken.
Chapters 3 & 5 paras 3.1 & 5.2 It is noted there is an inconsistency as to whether the Borough contains "urban sprawl" or not- BWM do support the characterisation of the Borough as a series of linked towns and urban villages where aspects of local distinctiveness can be identified.	There is no such inconsistency as paragraph 3.1 clearly states "This is no 'urban sprawl' but rather the Black Country has been described as 'The Endless Village'." This is a term used to describe the character of the Borough.	None
Figure 7- key is in error in respect of Coseley Corner and A491 Corridor that have been reversed.	Error noted and will be addressed.	Change/correct key to Figure 7.
Appendix 1A- maps for 1935 & 1985. Land occupied by New Hawne colliery annotated as "agricultural land" and BWM object to this as incorrect.	The Historic maps are meant as pictorial representations only and were produced to aid an understanding of the historic evolution of the Borough as a whole- they have no material site specific implications. Similarly, although the scale of mapping is such that individual areas of land are hard to recognise it does appear on close inspection that the area of New Hawne colliery is in fact annotated	Appendix 1A- no action required other than to add "Wasteland" to the key on the 1985 map.

Summary of comments	Council's Response	Council's Further Action
Additional Appendices- BWM recommends that relevant UDP Policies are reproduced as a first appendix for ease of reference.	correctly as "Wasteland" and depicted as such, although this does not appear in the key to the 1985 map and this will be revised. This suggestion is welcomed.	Introduce first appendix reproducing Policy HE1 as suggested

Sandwell MBC

Summary of comments	Council's Response	Council's Further Action
Supports the principle that historic landscape character appraisal can contribute to better planning. Supports the general approach and use of characterisation in contributing to the plan making process. Agrees the way forwards is through Local Area Appraisals wherever this level of detail is required for protection of the environment. Notes that appraisal is a valuable methodology but must be capable of being understood by those engaged in plan making and urban design.	None.	None.

Council for British Archaeology West Midlands

Summary of comments	Council's Response	Council's Further Action
CBA West Midlands supports the requirement for developers to commission Local Area Appraisals but queries how these will relate to the Black Country Historic Landscape Characterisation project.	An assessment of the Black Country Historic Landscape Characterisation project is being carried out and, until it is finalised and adopted, there is no way of judging how it might effect Local Area Appraisals in Dudley, if at all.	Consider issues relating to Black Country Historic Landscape Characterisation project when that is finalised and adopted.
Supports the intention to consider in due course adoption of the Black Country Historic Landscape Characterisation project as SPD.	Noted.	None
Question whether "Historic Environment" SPD is a misnomer since it only relates to landscape character and not the whole historic environment and would welcome the production of a broader Historic Environment SPD to follow on from this study.	"Historic Environment" relates to the UDP Chapter on the subject and the fact that the SPD is in support of specific Historic Environment Policies within that chapter.	None
There should be a link from the SPD PDF held in Planning Policy web page to the Historic Environment Section web page.	Noted	Ensure SPD PDF is accessible on Historic Environment Section web page.

Wordsley Historical Society

Summary of comments	Council's Response	Council's Further Action
The core of the objection relates to a lack of recognition within the SPD of administrative entities that were the precursors to the	The Council largely disagrees with the assertions made. The Character Study identified broad areas of shared character that cover large geographic areas but these	Amend text to reflect contribution to townscape character made by municipal buildings and places of worship. Specifically insert new

Summary of comments	Council's Response	Council's Further Action
establishment of Dudley MBC. e.g., County, Borough and Urban District Councils such as Amblecote. It is suggested that the text be amended to take these entities into account since it is asserted that much local character is derived from the fact that separate local government entities existed in the past and shaped local character.	areas are quite evidently not directly reflective of former administrative divisions. Rather, local character evolved as a result of extremely complex economic and social interactions related to the passage of time and to changing circumstances and to evolving opportunities for the exploitation of the environment and its physical resources. The resultant landscape and townscapes then eventually received an overlay of local government designed for administrative convenience and this process continues to the present. The generality of local character and distinctiveness cannot, therefore, be said to be a creation of local government. However, it is not fair to say that local administrative structures had no effect, insofar that local government often gave rise to distinctive physical expressions of civic status e.g. board schools, libraries, Council Houses, police and fire stations etc. The survival of such buildings certainly could be said to make a distinctive contribution, albeit a relatively minor one, to local character as by the same token did the erection of scores of new places of worship many of which have also survived to the present.	sentences at the end of the section on p18 entitled "Large scale Industrial Landscape" ie add: "Radical urban growth also brought with it the need for new administrative arrangements in the form of County, Borough and Urban District Councils and distinctive municipal buildings such as board schools, libraries, Council Houses, and fire stations still add to local distinctiveness. Scores of new places of worship were also erected at this time, non-conformist chapels and meeting houses and Anglican "Commissioners Churches" being required to augment the relatively few parish churches inherited from the medieval period".
It is suggested that the maps at Appendix 1 be retitled "Area now comprising Dudley Borough" rather than "Dudley Borough".	The SPD supports the Dudley Borough UDP and covers the area encompassed by the modern Borough boundary. The original titles of the maps are, therefore, strictly correct and could not be construed as misleading to any material extent.	None.
It is suggested that a list of all local government bodies that preceded Dudley MBC be included in the text or as an appendix.	Such a list is not relevant to the SPD since historic landscape characterisation deals with the analysis of the physical appearance of today's landscapes and townscapes within any given area (in this case Dudley MBC) regardless of past administrative arrangements.	None.

Black Country Society

Summary of comments	Council's Response	Council's Further Action
"Personally I think the whole document is excellent and I support everything in it. It is the best description of the Black Country that I have seen in 50 years".....the Report has been well put together- congratulations".	None required	None

Dr Peter King

Summary of comments	Council's Response	Council's Further Action
<p>"This document provides a useful description of the historic environment of the borough". Comments made are not strictly objections but comments on historical interpretation. Where academic disagreement over the historical evidence is legitimate the objector would not seek to impose his view. Viewed in that context particularly pertinent points raised are addressed below:</p> <p>Figure 4 should show Black Brook and Mousesweet Brook.</p> <p>Questions whether rural character areas in the south of the Borough should be distinguished one from another since they are all rural and whether Pedmore Common is an appropriate title for the whole of that area.</p>	<p>This is accepted.</p> <p>Character Areas are based upon observation of the modern landscape and there are clear distinctions between the rural character areas identified. "Pedmore Common" is a useful modern label for a whole area of relatively impoverished soils and notably sparse settlement and is</p>	<p>Add stream names to new figure showing industrial mills.</p> <p>None</p>

Summary of comments	Council's Response	Council's Further Action
Page 19- Audnam is misspelt.	not meant to be taken literally/legalistically. Accepted.	Correct spelling of Audnam in text.
Page 18- make clear industrial mills included e.g. blade mills.	Accepted.	Amend text in 2nd paragraph page 18 to read: "...being converted from grinding corn and fulling (processing wool into cloth) for use as blast furnaces, forges and for other ironware processing activities, for example blade mills for sharpening edge tools".
Pages 22-23- Pensnett Chase Character Area is considerably larger than the area of the medieval chase and this fact should be explained in the text.	Accepted.	Amend text on p22 under the heading Pensnett Chase to read in the second sentence: "the Borough's hugely important mineral resource that the Character Area largely encompasses".