

Historic England comments on Dudley Council Regulation 19 Local Plan Consultation version, 29 November 2024

Area of Plan	Historic England comments
Profile of the Borough	We welcome the many references to the cultural heritage of the Borough and the role heritage plays within Dudley.
Policy DLP10 Clause 3	Could reference the need to consider mitigation/enhancement measures from the Heritage Impact Assessment for housing allocation sites.
Housing Section on Page 128	There is no reference under evidence base to the Heritage Impact Assessment that has been prepared to inform the site allocations.
Policy DLP18 Page 165	Could reference the need to consider mitigation/enhancement measures from the Heritage Impact Assessment for employment allocation sites.
Employment Section on Page 170	There is no reference under evidence base to the Heritage Impact Assessment that has been prepared to inform the site allocations.
Policy DLP19/20	References could be incorporated to protecting the significance of heritage assets and their setting and linking to the evidence within the Heritage Impact Assessment.
Policy DLP30	We support clause 2 a.
Policy DLP34	The policy could also refer to the retention of hedgerows on historic landscape considerations and where the hedgerow makes a contribution to the significance of heritage assets and the wider historic landscape they are experienced within.
Policy DLP35	The policy could also refer to the contribution made by heritage to the UNESCO Global Geopark and the number of heritage assets contained within the boundary, to ensure their protection and continued role within the wider landscape.
Policy DLP36	Support the references to heritage assets.
Policy DLP41 Clause h	Re-write to state 'not cause harm to the significance, historic fabric...'
Policy DLP42 Clause d	This policy should refer to preventing harm to heritage assets and protecting the significance of heritage assets including their setting. Could refer to avoiding harm and then continue the sentence re significance.
Policy DLP45	The policy should consider what the harm could be for heritage assets as a result of both flooding and mitigation measures to the watercourse. For example, impacts to water logged archaeology that could be affected through alterations to the watercourse. A reference to the consideration of the historic environment within proposals would satisfy this.
Policy DLP46	The policy should consider what the harm could be for heritage assets as a result of both flooding and

	mitigation measures to the watercourse. For example, impacts to water logged archaeology that could be affected through alterations to the watercourse. A reference to the consideration of the historic environment within proposals would satisfy this.
Policy DLP51	We would anticipate to see a reference to the historic environment within this policy, as a component of green infrastructure.
Policy DLP53	Leasowes Registered Park and Garden could usefully include a reference on the need to protect the significance of this heritage asset including its setting, especially from inappropriate development/restoration. We are supportive of its reference within the Plan and the aspiration for appropriate restoration.
Section 14 Historic Environment	<p>We are supportive of such an extensive and locally responsive chapter in the Plan for the historic environment, covering both designated heritage assets as well as local designations specific to Dudley and its unique and special history and character. We particularly welcome the overarching holistic approach of the policy section which seeks to ensure that designated and non designated heritage assets are protected but also focusses on the wider local distinctiveness of Dudley and the less tangible elements of the historic environment to ensure that the uniqueness and character of Dudley is safeguarded for future generations.</p> <p>The policies are well considered and are justified by significant evidence, as detailed within the Plan, which in turn will ensure that the policies are effective in practice. We welcome this approach.</p>
DLP67 Clause 2/ DLP68 Clause 2	Has the land safeguarded for future transport development been considered based on its potential impact on the historic environment, and deemed an appropriate location?
Policy DLP77 Clause 1	Has this site been considered in the context of its impact on the historic environment and potential harm?
Policy DLP83 Clause 4	This policy should relate to the significance of heritage assets.
Policy DLP89	Are there any specific measures that could be listed here for the historic environment? For example, illuminated signage would be resisted.
Dudley Local Plan Part Two	
Policy DLPBH3	This public realm policy and those that follow in the Plan could insert a clause to consider the potential enhancements for the historic environment through appropriate design and public realm improvements. We would welcome the Council incorporating a clause that reflects the role of heritage within the Public Realm. Incorporating some text in the justification section could also work well.
Page 29 onwards	The use of area specific policies for the Conservation and Enhancement of Local Character and Distinctiveness and Conservation Areas, are welcomed within the Plan. These provide additional specific local information informed by a robust evidence base which should ensure that prospective applicants have a variety of useful information to prepare informed planning applications.
Figure 1.4 onwards	Have the priority sites in this figure and other Transport and Movement Plans within the Plan, be subject to

	consideration of their impact on the historic environment and any potential harm to the significance of heritage assets?
Table 1.1 Brierley Hill Allocations	There is no reference to the HIA for these sites or any mitigation measures that may be required in order to overcome any harm as a result of allocation.
DLPBHPS1	The heritage assessment for this site states that due to the non designated below ground archaeology present on site that there should be a requirement for a desk based archaeological study and potential for further evaluation, if required. This is the type of mitigation measure we would anticipate seeing within the historic environment section of the policy.
DLPBHPS2	The heritage assessment for this site states that due to the potential non designated below ground archaeology present on site that there should be a requirement for a desk based archaeological study and potential for further evaluation, if required. This is the type of mitigation measure we would anticipate seeing within the historic environment section of the policy. The mapping also refers to a Conservation Area but there is no reference in the HIA or Plan to a Conservation Area and any impacts on this heritage asset.
Policy DLPDPS1	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures with the policy detail. There is a Conservation Area near the site and a number of Listed Buildings nearby.
Policy DLPDPS2	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures with the policy detail. There is a Conservation Area on the site and listed buildings nearby.
DLPDPOS1	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures with the policy detail.
DLPDOS4	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures with the policy detail. Archaeological assessment is requested as being required but we cannot locate this HIA.
Table 2.1 Dudley Site Allocations	There is no reference to the HIA for these sites or any mitigation measures that may be required in order to overcome any harm as a result of allocation.
Policy DLPS7	Have any considerations for the historic environment been fully considered in respect of the proposed ring road in Stourbridge?
Table 3.1 Stourbridge Site Allocations	There is no reference to the HIA for these sites or any mitigation measures that may be required in order to overcome any harm as a result of allocation.
Policy DLPDOS1	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures with the policy detail. Paragraph 3.45 references some heritage considerations to be aware of.
Policy DLPDPS2	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures with the policy detail. Paragraph 3.48 lists a number of heritage assets that could be affected, and consideration needs to be taken.
Policy DLPSOS3	I cannot locate the HIA for this site under this name/ policy number to cross reference the mitigation measures

	with the policy detail. There is a Grade I church opposite the site, how has this been assessed?
Table 4.1 Halesowen Site Allocations	There is no reference to the HIA for these sites or any mitigation measures that may be required in order to overcome any harm as a result of allocation.
Table 6.1 Housing Allocations	There are a number of housing allocations which are proposed that will have an impact on heritage assets and the require appropriate mitigation. There is no reference to the HIA for these sites and any proposed mitigation measures that would be required to overcome any harm. How will the Plan deal with this issue? How will planning officers and prospective developers know what issues need to be considered prior to determining planning applications?
Table 8.1 Employment Allocations	There are a number of employment allocations which are proposed that will have an impact on heritage assets and the require appropriate mitigation. There is no reference to the HIA for these sites and any proposed mitigation measures that would be required to overcome any harm. How will the Plan deal with this issue? How will planning officers and prospective developers know what issues need to be considered prior to determining planning applications?