



MIDLANDS OFFICE

For attention of: Local Plan Team
Dudley Council

Dear Sir, Madam,

Re: Dudley Council, Regulation 19 Local Plan consultation, November 2024

Many thanks for consulting Historic England on the above consultation.

Our detailed comments to this consultation are appended to this letter in Table 1. Please see these comments and if you have any questions, we are available to respond.

We consider that the policy approach the Council has taken to both Section 14 of Local Plan Part One and the additional area specific historic environment policies within Local Plan Part Two provide a positive strategy for the historic environment and respond both to the requirements for heritage assets but also to protecting and enhancing the unique, special character of Dudley. The policies are supported by an extensive evidence base and go into relevant detail that will ensure the policies are effective and a practical resource for prospective developers. We support the policy approach contained within the Regulation 19 consultation version.

When reading through the Plans, we could not locate any reference to the Heritage Impact Assessment (HIA) document prepared by the Council, either referenced specifically in relation to site allocation policy or listed as an evidence base that had informed a policy approach. We consider that the Local Plan should reference this document so that once the Plan is adopted, it can be utilised and aid in future planning applications.

We are unclear how the HIA has been utilised within the site allocations approach in the Plan. At times there is reference in the Local Plan to some of the mitigation measures highlighted within the HIA and at other times we could either not locate a HIA for a site, or there is a table approach listing allocations by name only. There is no connection with the HIA, or any assessment/ mitigation measures for these sites. We would welcome understanding how this approach has been taken and



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to assess if there are positive opportunities to refer to the mitigation measures listed for the sites to ensure the policies/ allocations are effective and justified.

We note Section 8 of the HIA and that it was considered that there were no amendments required to the Local Plan. However, we remain unclear on the approach for sites and ensuring that any harm will be fully mitigated, through the Local Plan, at the appropriate time. We are available for a discussion on this subject.

If you have any questions, please contact us.

Yours sincerely,

Kezia Taylerson

Historic Environment Planning Adviser (Midlands)



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