

Representation form

Dudley Local Plan

Publication Plan

Consultation October 2024



DUDLEY LOCAL PLAN

We are inviting your views on the publication version of the Dudley Local Plan. This form should be used to make comments (known as representations) in response to the consultation.

Guidance notes are available to help you complete this form and can be found online at www.dudley.gov.uk/localplan

The consultation period begins on Friday 18 October 2024, and closes at 5pm on Friday 29 November

Comments can be submitted:

Online: On our online portal available here www.dudley.gov.uk/localplan

By email: planning.policy@dudley.gov.uk

By post: Dudley Local Plan, Planning Policy, Planning & Regeneration, Council House, Priory Road, Dudley, DY1 1HF.

Additional copies of this response form can be downloaded at www.dudley.gov.uk/localplan or a copy can be posted to you - please call us on 01384814136.

This form has three sections:

Section A: Personal details

Section B: A declaration which you will need to read and sign

Section C: Your representation/comments on the Plan, Sustainability Appraisal or supporting evidence.

Please note:

- 1 You can use this form to comment on more than one site and/or policy. For each comment, please tell us the site/policy reference that your comment refers to. A separate form C should be completed for each comment.
2. Responses must include your name and address.
3. Your comments cannot be treated as confidential. By completing this form, you agree to your details being shared and your name and comment (but not your address or other personal details) being made available for public viewing.
4. It is recommended that groups that share a common view send a single response rather than multiple copies of the same response. Please attach a list of the contact details of each person who supports the comments, including their names and addresses.
5. **Completed forms should be received by us no later than 5pm 29 November 2024.**
6. Paper copies of this form and guidance notes can be found in selected libraries - visit www.dudley.gov.uk/localplan for the full list and at Dudley Council House, 1 Priory Road, Dudley, DY1 1HJ.

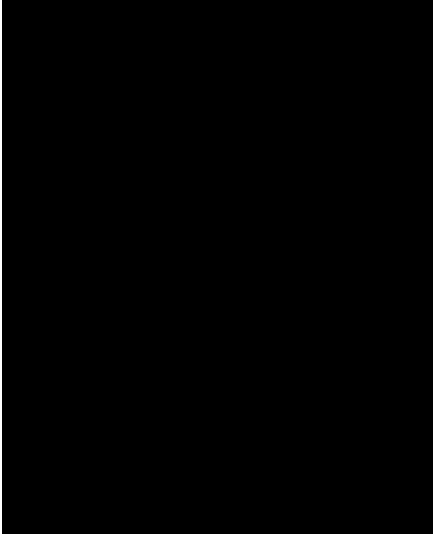

Individual acknowledgement of receipt will not be possible.



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Respondent No:		Representation No:		Date received:	
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Part A - Personal details

	1. Personal details	2. Agent's details (if applicable)
Title		
First name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
House No./Street		
Town		
Post Code		
Telephone Number		
Email address (where relevant)		

Notes:

1. If you are responding as an individual (e.g. a resident) you do not need to fill in the job title and organisation boxes unless you are responding as a member of an organisation.
2. If you are an agent responding on behalf of an organisation please ensure that your details are in the Agent's details column and give the details of the client you are responding for in the Personal details column, only the title, name and organisation boxes are necessary.

Please indicate which of these best describes you / your role in responding to this consultation	
Resident or Individual	
Planning Agent or Consultant	X
Developer or Investor	
Landowner	
Land & Property Agent or Surveyor	
Local Authority	
Public service provider e.g. education establishment, health etc	
Public agency /organisation	
Community or other Organisation	
Charity	
Other (please specify in space below)	

Please note that copies of all comments received, including the name(s) of the respondent(s) will be made available for the public to view. All other personal details will remain confidential. Dudley Council will process your personal data in accordance with the Data Protection Act 2018. Our Privacy Notice is at the end of this form.

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Part B: Declaration

How we will use your personal information

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the council to contact you if necessary regarding your submission. Your name, organisation and comments will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and in order to protect personal data, we will not publish signatures, telephone numbers, addresses or email addresses on the internet.

Your details will be kept until the Local Plan is adopted plus a further ten years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. When other agencies are involved in Local Plan preparation, we may need to share details about you to enable us to work together for your benefit. Information will only be shared with third parties if they have genuine and lawful need for it. Information shared on this basis will not be reused for any other purpose. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

Please sign and date this form.

Forms signed electronically will be accepted.

Declaration:

By completing and signing this form, I agree to my name, organisation and representations being made available for public inspection on the internet.

Signature



Date: 29th November 2024.....

I understand that in submitting my representations, that my details will be added to the Dudley Local Plan Consultation database and I may be contacted at future stages of the local plan process.

All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ("GDPR"). If you do not wish to be contacted further, please advise us.

No, I do not wish to be contacted about the Local Plan

A copy of our privacy notice is available at <https://www.dudley.gov.uk/privacy-disclaimer-statement/regeneration-and-enterprise-dudley-local-plan-privacy-notice/>

Thank you for taking the time to provide your response.

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Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

Q1. To which part of the document does this response relate?

Title of document	Dudley Local Plan Pre-Submission Draft Plan (Reg 19 version)		
Paragraph/section		Policy	DLP11
Site		Policy Map	

Responses can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy or site in the Dudley Local Plan.

Q2. Do you consider the Local Plan is:

- | | | | | |
|---|-------------------------------------|-----|--------------------------|-------------|
| 1. Legally compliant | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| 2. Sound | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No X |
| 3. Complies with the Duty to co-operate | | Yes | <input type="checkbox"/> | No X |

(Mark as appropriate)

Please refer to our guidance notes for help with the above definitions - 1 to 3.

Q3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy DLP 11 Housing Density, Type and Accessibility

The policy specifies the density and type of new housing that should be provided, with new housing development to be informed by the need for a different type and range of size of accommodation, levels of accessibility and the need to achieve high quality design. The policy then goes on to state that developments of 10 or more homes should provide a range of house types and sizes and that developments of 10 or more homes should achieve the density target set out within the policy. These range from 100 dwellings per hectare on sites that are within strategic centres or town centres, down to 45 dwellings per hectare where a site is accessible for a high density housing site or 40 dwellings per hectare for a moderate density housing development. In seeking to achieve the density targets set out above we note the evidence contained in the Dudley Housing Market Assessment (2024). This sets out the size of housing required within each tenure within Dudley for owner-occupied, rented, shared ownership or social rented / affordable rented properties. What is clear is that for all 4 of these tenures nearly 50% of the properties are required to be 3 or 4 bedroom properties. Three or four bedroom dwellings tend to be houses as opposed to apartments and would therefore deliver a much lower density development than a wholly flatted scheme. Densities of 45 or 100 dph are unlikely to be met if larger 3 or 4 bedroom houses are proposed. Even achieving a density of 40dph with family housing will prove challenging.

Similarly, if high density development is to be achieved then this is likely to be comprised of 1 and 2 bedroom apartments and would not therefore deliver the full range of housing that the policy seeks nor meet the main size (by number of bedrooms) that the Council's evidence is saying is required.

Whilst it is noted that a range of densities are proposed in different parts of the Borough the Dudley Housing Market Assessment (2024) is clear that there is a significant demand across all tenures for 3 and 4 bedroom properties. If this need is to be met then sites and town centres or in the strategic centres, where new development is proposed to be focused, these areas and sites are unlikely to deliver the larger properties that are required. This reinforces WL's view that the range of different sites are required in order to help meet the housing needs of the Borough going forward.

A further consideration in seeking to achieve the density assumption set out in the policy also relate to meeting other aspirations and policy objectives in the Plan. This could include provision of open space, achieving high quality design and incorporation of National Described Space Standards and accessible housing. A combination of these and other policy considerations can and will impact on the density of development that can potentially come forward on sites.

WL therefore object to Policy DLP11 on the basis that it is not effective and will not result in the majority of housing needs, which are predominantly for 3 and 4 bedroom properties, being met. Meeting the actual housing needs of those in the Borough in need of a home appears to have been sacrificed for higher density flatted development where the actual need is for family housing. WL do not consider that sufficient land or suitable sites have been identified to deliver family housing whilst also

achieving the density targets along with a number of other policy objectives and aspirations such as POS, car parking, NDSS and accessible homes.

Continue on a separate sheet if necessary.

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Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to address WL's concerns, additional land for housing, such as the site at Worcester Lane should be allocated for development.

Continue on a separate sheet if necessary.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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Q5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note, that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

Q6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As a promotor with a site in the Borough that has been previously been considered by the Council suitable for allocation for development, and which would help address the Council's housing shortfall, we would welcome the opportunity to present our case in person to the Inspector.

Please note, the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Completed representations forms can be submitted by emailing: planning.policy@dudley.gov.uk

Please enter **Dudley Local Plan Representation** in the subject field of the email.

Alternatively, completed consultation forms can also be submitted by post to: **Planning Policy, Planning Services, Dudley Council, Council House, Priory Road, Dudley DY1 1HF by 5pm 29 November 2024.**

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