

Part C: Comments

Complete one section C per comment on the Local Plan.

Please ensure that you also complete:

section A and B (personal details and declaration) ONCE and submit alongside your section C form(s).

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Please complete Questions 1 and 2 if you know this information.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	All	Policy	All
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 Draft Dudley Local Plan.

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

DRAFT DUDLEY LOCAL PLAN - Part 1 - ALL POLICIES

- (1.) Within DLP Part 1, broadly, I support Policies and paragraphs within them unless I state otherwise.
- (2.) I may add additional support to Policies and/or paragraphs that I consider most important.
- (3.) Reserve the right to withdraw support or objections if further evidence comes to light.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	1.a & 2.a	Policy	DLP1 Development Strategy
Site	Embankment / Daniels Land	Policy Map	

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Policy DLP1 Development Strategy

>COMMENT A

Quote: "1.a. Deliver at least 10,876 net new homes and create sustainable mixed communities that are supported by adequate infrastructure."

The creation of "sustainable mixed Communities" is crucial.

Quote:- "2.a. Delivering development in the existing urban area supported by infrastructure to meet the needs of communities and businesses."

It is important that "needs" are determined by relevant communities and businesses and not by remote theoreticians.

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Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	3	Policy	DLP1 Development Strategy
Site	Embankment / Daniels Land	Policy Map	

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Policy DLP1 Development Strategy

Comment B.

Paragraph 3.

Quote:- "Table 5.1 shows how the full housing and employment land requirements for the Dudley Borough will be met through identified sites, and through reliance on neighbouring and other local authorities who have a functional link with Dudley via the Duty to Cooperate. Those development needs that cannot be accommodated within the Dudley administrative area will be exported to sustainable locations in neighbouring local authority areas."

Comments:- Surely the Duty to Cooperate works both ways and other Local Authorities may wish to export to Dudley. Therefore, exporting development needs may not be an option in practice and should not be relied upon as a solution to Dudley's problems.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section		Policy	Policy DLP8 Health and Wellbeing
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 Draft Dudley Local Plan.

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- ☐ General comment
- ☒ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP8 Health and Wellbeing
I support the general aims of the Policy.
I note:-
Paragraph 2 - The need to provide a screening Health Impact Assessment as part of the planning application for certain developments.
Paragraph 4 - To support the physical, social, and mental health and wellbeing of its residents, Dudley will support vibrant centres and local facilities, this will include managing the location, concentration of and operation (including opening hours) of businesses which contain uses running contrary to these aims including:
a. Proposed developments for Hot food takeaways (including hybrid uses incorporating such uses).
Developments will only be supported where they support this aim and Policy DLP29

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	3.a	Policy	DLP11 Housing Density,
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 Draft Dudley Local Plan.

Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP11 Housing Density, Type and Accessibility.

Quote:- "2. Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information."

Quote:- "3. All developments of ten homes or more should achieve the minimum net density set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy DLP55:

(3.a.) 100 dwellings per hectare where Table 8.2 accessibility standards for very high-density housing are met and the site is located within a Strategic Centre or Town Centre"

Table 8.2 shows that 100 DPH is Very High Density, 100% Flats and not really suitable for Families - and we need at least a moderate proportion of Families living within Town Centres in order to provide firm foundations on which strong, stable, sustainable, Communities with a sense of belonging, can be built.

Policy DLP1 paragraph 1.a sets an objective of creating "sustainable mixed communities"

Developments of about 100% Flats are likely to appeal to people buying or renting their first Home as a prelude to moving to a house somewhere where they can settle and put down "roots".

Creating a transient population would be the opposite of a "sustainable mixed community".

Therefore, I object to such high density developments.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	1.d.	Policy	Policy DLP17
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 Draft Dudley Local Plan.

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP17 Houses in Multiple Occupation

In general I do not support HMOs because they can be a source of trouble. They should be tightly controlled and only allowed if there is a genuine need.

I welcome the below statement in DLP17, paragraph 1.d.

"d. Provision for off- and on-street car and cycle parking is sufficient and appropriately incorporated and would not have an adverse impact on the surrounding area by way of increased on-street parking, impaired highway safety or impeding proper access to the area."

There has been an assumption that people in HMOs do not have Cars but, in the real world, some do and proper proper provision must be included in any Planning Applications.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	1.c	Policy	Policy DLP28
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 Draft Dudley Local Plan.

Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP28 Residential Developments in Centres

Paragraph c. "A reduction in the level of parking against the standards normally required for residential development may be considered applicable, where the site is evidenced as being within a 400m walking distance of public transport."

I most strongly object to any reduction whatsoever of required Car Parking provision in Town Centres - or anywhere else.

The 2021 Census shows that 79.5% of Households in Dudley Borough have one Car or more and only 20.5% have none.

Government Statistics for England show that as of 2021, 77% of people 17 year old and over had a full Driving License.

UK Year to November 2023 New Car Sales was 1.8 Million - an increase of 18.6% on the same period in 2022. Electric and Hybrid Cars saw the greatest increase at 27.3%.

Used Car Sales have increased by 4.5% over the same period.

Anyone who can drive and afford to run a Car will do so. I learnt to drive because I got fed up with waiting, often in the cold and rain, for Buses that didn't show up and took ages to get from A to B.

The Car is here to stay. If adequate Car Parking is not provided in Town Centres, people with reasonable incomes will not want to live there and the Centres will become Ghettos for poor people rather than the diverse vibrant communities to which the DLP aspires.

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Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	All of Policy	Policy	Policy DLP29
Site		Policy Map	

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- ☐ General comment
- ☒ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP29 Hot Food Takeaways.
In paragraphs 5 and 7 consideration of the cumulative effects of Hot Takeaway is proposed.
I believe that this is a wise approach.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	All	Policy	Policy DLP37
Site		Policy Map	

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- ☐ General comment
- ☒ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP37 Open Space and Recreation.

Support but query paragraph 3.a. - I'm sceptical as to how that would work in practice.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	1.b.	Policy	Policy DLP44
Site		Policy Map	

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- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP44 Air Quality

"1.b. promoting and supporting (including through continued joint working with authorities inside and outside the Black Country) a modal shift from private motorised vehicles to the use of clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks, cycling and walking;"

With respect to Air Quality, the private Car itself is not a problem – it's the means of powering it. This problem is being dealt with by the introduction of alternative power sources such as Batteries and Hydrogen. Most Buses and many Trains are Diesel powered and therefore are at least as polluting as Cars and so not a clean alternative. As with Cars, no doubt this will be dealt with in due course – and Buses are far from fast. People will continue to use Cars because they are flexible, convenient, comfortable, reliable, time-efficient and people using them can get from their home directly to a destination without excessive exposure to bad weather. As such, for the individual, in most scenarios, a Car is by far the most sustainable mode of transport. I speak, not from theory or wishful thinking but from over 60 years personal experience that began with about five nightmare years of Bus use that was only relieved when I learnt to drive. When I've had to use Buses recently, I found that nothing had changed. Cars, Public Transport and Cycling are not mutually exclusive so, people should have those options available and the support infrastructure for all forms should be provided. Within about a mile or so, I enjoy walking (weather and Arthritis permitting) and would use the Train if I ever needed to go to central Birmingham. Otherwise, I use my Car.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 1		
Paragraph/section	1.b	Policy	DLP73 Parking Management
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 Draft Dudley Local Plan.

Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLP73 Parking Management

"1.b. the type of parking – ensuring that where appropriate long-stay parking is managed and minimised in town centres, to support parking for leisure and retail customers and to encourage commuters to use more sustainable means and reduce peak hour traffic flows."

I most strongly object to minimising Long-stay Car Parking provision in Town Centres

Although I understand the reasoning behind this idea, it is seriously flawed.

Sufficient Car Parking should be provided to meet the needs of both regular Commuters and Visitors – be they people there on Business or those there for Shopping or Leisure.

Otherwise, without controls, most long-stay spaces would be occupied by Commuters early in the day before Leisure and Retail Customers arrived.

I can not see what controls would actually work. If, say, a time limit were imposed on the length of stay, then that Car Park would no longer be Long-stay.

If the pricing regime were structured to deter people from staying too long then that would hit both Commuters and Customers.

I can not see how this part of the Policy can be applied and enforced in practice. Ultimately it would do more harm than good.

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- ☐ Supporting evidence base document

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Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	All	Policy	All
Site		Policy Map	

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BACKGROUND COMMENT.

I have lived in central Brierley Hill about five minutes walk from the High Street all 78 years of my life - so I know a bit about the place.

Therefore, my comments on Draft DLP Part 2 will be confined to Brierley Hill.

For each Policy, unless I state otherwise, assume that I have no substantial objections.

I have witnessed the decline of the Town due to neglect and am pleased that there is now investment in its refurbishment and regeneration.

I participated in the consultation for the Brierley Hill Area Action Plan. I considered, many of its aims overambitious and based more on wishful thinking than reality.

The general proposals in this new Plan are less ambitious but I feel that there is still an element of wishful thinking - particularly with respect to the amount of occupied Industrial/Employment land likely to be vacated for Housing.

I also see an over-emphasis on so-called sustainable modes of Transport which could lead to a failure to make adequate provision for private Cars. People are not going to regularly abandon in any significant number, the convenience, reliability, flexibility, security and comfort of their Cars for an inferior mode such as Public Transport - and Cycling will remain a minority pursuit.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	4	Policy	POLICY DLP BH1
Site		Policy Map	

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- ☐ Support
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POLICY DLPBH1 – DEVELOPMENT IN THE BRIERLEY HILL STRATEGIC CENTRE AND TOWN CENTRE CORE

Paragraph 4 starts by saying "Brierley Hill Strategic Centre should be accessible by a variety of means of transport, particularly walking, cycling and public transport."

It then says, "Proposals for commercial and business development that involve more than 500 sq m (gross) of floorspace within The Merry Hill Centre Core Area or within well-linked edge-of-centre locations to that core area," must produce evidence that provisions have been set out "for the enablement or enhancement of sustainable means of travel and integrated modes of transport" to and within the Centre "with a particular focus on the management of demand for car parking and car-borne traffic, including through car parking regimes"

Comments:-

- (1.) I would hope that "a variety of means of transport" includes private Cars which, in the real World, Cars are the means of transport chosen by most people – and for good reasons. It is not practical to lug bulky shopping Home on a Bus where space is limited – and Bicycles and walking are non-starters. This is particularly, but not exclusively, the case with weekly Supermarket shopping.
- (2.) I have no objection as such to "enablement or enhancement of sustainable means of travel and integrated modes of transport" because it gives people a choice.
- (3.) "The management of demand for car parking and car-borne traffic, including through car parking regimes" means using Car Parking charges to deter people from using their Cars. Free Car Parking has long been one of the main selling points for Merry Hill Centre. It is inevitable that the introduction of charges would deter some people from shopping in the Centre so often and thereby harm business. The degree of harm would depend on the level of charges which is probably why the Owners have adopted a phased approach.

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Part C: Comments

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Question 1. To which document does this response relate? (Please tick one box)

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- ☐ Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan Volume 1 and Volume 2
- ☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan
- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	1 & 2	Policy	Policy DLP BH3
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 Draft Dudley Local Plan.

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH3 Public Realm in Brierley Hill

1. The Primary Public Spaces identified on the Brierley Hill Inset Plan Policies Map

2. The Primary Thoroughfares identified on the Brierley Hill Inset Plan Policies Map

Neither are shown on the Map.

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- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	1 & 2	Policy	Policy DLPBH8
Site	All Housing in BH	Policy Map	

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

Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH8 Residential Growth in Brierley Hill

> Paragraph 1 says:- "Sufficient land will be provided to deliver up to 1,636 new dwellings"

But the number of proposed Dwellings in Table 1.1 on Page 45 of this document adds up to 1,848.

> Paragraph 2. To each site listed, I have added the number of Dwellings, the Density per Hectare from the SHLAA 2022/2023 and calculated the likely number of Flats using Table 8.2 on page 112 of Draft DLP Part 1

(a.) Land at Waterfront Way and Level Street (Priority Site) (600 Dwellings @ 95 DPH = 552 Flats)

(b.) The Embankment / Daniels Land (Priority Site) (300 Dwellings @ 140 DPH = 300 Flats)

(c.) * Level Street/Old Bush Street (95 Dwellings @ 90 DPH = 81 Flats)

(d.) Harts Hill, east of Dudley Road (310 Dwellings @ 50 DPH = 71 Flats)

(e.) Waterfront Way West (61 Dwellings @ 150 DPH = 61 Flats)

(f.) * Canal Walk South, Mill Street (250 Dwellings @ 90 DPH = 221 Flats)

(g.) * Land at Moor Street (60 Dwellings @ 60 DPH = 23 Flats)

(h.) * Land at Bell Street and High Street (120 Dwellings @ 75 DPH = 73 Flats)

(i.) Oak Court Car Park, Dudley Road (24 Dwellings @ 64 DPH = 11 Flats)

(j.) * Old Carriage Works, Mill Street (28 Dwellings @ 100 DPH = 28 Flats)

TOTALS for All of the Strategic Centre 1,848 Dwellings 1,421 Flats

TOTALS for Central Brierley Hill (starred above) 553 Dwellings 426 Flats

In both Strategic Centre and Central Brierley Hill about 77% of proposed Dwellings would probably be Flats which are not ideal for building the bedrock of normal families needed to build strong, stable communities.

There are already about 605 Flats on the Chapel Street Estate which is probably the biggest concentration in Dudley Metropolitan Borough – so we have already provided a fair share.

Therefore, I strongly object to the level of the proposed additional contribution. To provide a more balanced population we want a much higher percentage of Family Homes rather than Flats.

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- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	2	Policy	Policy DLP BH8
Site	BH H001	Policy Map	BH Inset

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

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH8 Residential Growth in Brierley Hill – COMMENTS 2

~> Site DLP BH H001 – Land at Moor Street

This is a new site and was not part of BHAAP-BR1 as claimed by the SHLAA 2022/2023.

It consists of the Grade 2 Listed former Library & Technical Institute, with Planning Approval (P21/2237 & P21/2238) for conversion to 20 Flats, the adjacent Northmoor Industrial Estate and Green Open Space on the corner of Moor Street and Fenton Street.

There is no Car Parking provision for the 20 proposed new Flats which will inevitably result in overspill parking in the immediate area.

*The Industrial Estate consists of four Units at least two of which are currently occupied (the other two need to be checked). It fronts onto Moor Street and there is adjacent Housing on the other three sides so it does not fit in to its surroundings. I would support the conversion of this site to Housing subject to alternative accommodation being provided within Brierley Hill for the businesses affected and adequate Car Parking provide not only for additional Housing but also for the 20 new Flats in the former Library & Technical Institute

*The Green Open Space on the corner of Moor Street and Fenton Street being developed for Housing is questionable. The Saltwells Wood has been included in the Brierley Hill Strategic Centre because of lack of Green Open Space so it does not seem logical to build on an existing Green Open Space close to the Historic Town Centre.

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- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	2	Policy	DLPBH8
Site	BH H010 & BH004	Policy Map	

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

Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH8 Residential Growth in Brierley Hill – COMMENTS 3

~> Site DLP BH H010 – Land at Bell Street and High Street

This is BHAAP Block BR1 minus the Moor Centre and its Car Park.

It consist of the JD Gyms and Mecca Bingo building and their Car Parks.

Both of these provide core Town Centre Leisure facilities. The Gym in particular provides facilities beneficial to the health and well-being of the Community.

Including them in the proposed Housing list is absurd.

Therefore, I OBJECT to the proposal.

~> Site DLP BH H004 – Level Street/Old Bush Street

The SHLAA 2022/2023 says that this is BHAAP Block BR16B and gives an area of 1.06 hectares

The DLP-BH Inset Map shows BH H004 as including both BR16B and BR16C

BR16B is 0.37 hectares and BR16C is 0.64 hectares giving a total of 1.01 hectares – which is closer to that claimed. The discrepancy needs to be sorted out.

* Level Street had Housing when I was growing up in the 1950s but has evolved as a commercial corridor linking High Street with Trading Estates to the East of Pedmore Road. In my view, it should stay that way and any further development should be in line with that role.

We need local jobs so that local people can earn sufficient money to buy or rent Homes.

Therefore, I OBJECT to the inclusion in the proposed Housing list.

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- ☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan
- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	2	Policy	DLP BH8
Site	BH H009 & BH003	Policy Map	BH Inset

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

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH8 Residential Growth in Brierley Hill – COMMENTS 4

~> Site DLP BH H009 – Old Carriage Works, Mill Street

This is new – it was not in the BHAAP.

The site includes old Industrial/Warehouse buildings divided into about ten Units and sharing a common yard and access from Mill Street. Several businesses operate at the site.

I would have no objection to Housing on this site providing that alternative accommodation within Brierley Hill were found for the businesses displaced. Local jobs must be preserve for local people so that they are able to buy or rent Houses in the area.

~> Site DLP BH H003 – Canal Walk South, Mill Street

This site consists of BHAAP Blocks BR13D, BR13E & CW1

* BR13D & BR13E is the former Van Leeuwen Factory which was recently sold, converted into Sub-units and Advertised to let. CW1 is the Link 51 Factory and grounds an is still in operation.

* Converting these sites to Housing would make sense because there is Housing (the Chapel Street Estate) and a Primary School on the opposite side of Mill Street and beyond the Boulevard Junction there is long established existing housing and an RC Primary School. A continuous Housing corridor would thereby be established to and from the High Street area – but with primarily proper Family Homes rather than Flats.

*However, this could only be achieved if those sites were to become available. Businesses, and therefore jobs, must be protected and retained in and around Brierley Hill.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	2	Policy	DLP BH8
Site	BH H002 & BH008	Policy Map	BH Inset

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

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH8 Residential Growth in Brierley Hill – COMMENTS 5

~> Site DLP BH H002 – Waterfront Way West.

This site at Round Oak, is part of BHAAP-WW1.

* Outline Planning permission to build a block of Flats on it was granted on 17th. November 2020 via Planning Application No. P19/1625.

Reserved Matter Application P22/1589 was registered on 22nd. November 2022 for a four-storey building comprising 48 Flats. There were various problems with respect to building design and the size of the Flats and it was withdrawn on 14th. March 2023.

* I have no objection to some sort of Housing on that site as long as there is adequate Car Parking provision – and no adverse effect on Residents of the "Landmark" building Flats opposite. However, as a proposal for 48 Flats got nowhere, I can not see one succeed for 61 Flats in a necessarily taller building.

~> Site DLP BH H008 – Oak Court Car Park, Dudley Road

This was not included in the BHAAP.

* An Outline Planning Application P20/1815 for an indicative seven-storey block of 105 Studio Flats to provide accommodation for Students at the Resonance Music Institute at Cable Plaza, Waterfront West was refused by Dudley LPA on 28th. October 2022. It was judged to be an over-intensive, cramped development with inadequate parking and causing loss of light and outlook for residents of Oak Court. On 27th. April 2023, the Applicant lodged an Appeal which was subsequently dismissed on 25th. October 2023.

* The land was sold and Application P23/0814 was registered for Full Planning permission to convert the site into an Electric Vehicle Charging Station with 12 Charging Points. Permission was granted on 8th. November 2023.

* This now approved use fits in with a general "green" aim of providing infrastructure supporting the use of Electric Vehicles and should be accepted.

* I see no prospect of this site becoming available for Housing.

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- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	2	Policy	DLP BH8
Site	BH H006 & BH007	Policy Map	BH Inset

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

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBH8 Residential Growth in Brierley Hill – COMMENTS 6

~~> Site DLP BH H006 Vacant Land at Harts Hill, east of Dudley Road

If the land is vacant, I have no objection to its use for Housing – as long as that will not adversely affect the operation and viability of the adjacent Industrial Estate.

~~> Site DLP BH H007 Industrial Estate at Harts Hill, east of Dudley Road

Although parts of this Industrial Estate look run down, other parts are not and there are quite a number of businesses operating from it. Finding alternative sites for all of them would be a mammoth task and impractical. In my view, the Estate should remain as an Employment site and redeveloped as such.

We need to preserve job availability locally so that local people can earn the money to buy or rent Houses elsewhere in the Brierley Hill area.

Therefore, I OBJECT to this site being included in the Housing list.

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Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	Map etc.	Policy	DLPBHPS1 (Priority Site)
Site	Waterfront Way and Level Street.	Policy Map	

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

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBHPS1 (Priority Site) Land at Waterfront Way and Level Street.

COMMENT 1 – CONTRADICTIONARY INFORMATION.

(A.) The Brierley Hill Inset Map show this site as including the following BHAAP Development Blocks:- W1, W2, W3, W4, W5 and about half of P4.

(B.) However, in Draft Dudley Local Plan - Part 1, Appendix 2 Page 438, Blocks W1, W2, W3 and W4 are stated to be removed with, on Page 439, W5 being carried forward as part of allocation DLP BH PS1.

(C.) The SHLAA 2022/2023 states that the Area covered consists of BHAAP Blocks W5 and P4 and gives the area of BHPS1 as 7.6ha gross (5.7ha nett).

However, the area of W5 is 3.8ha and P4 as 0.9ha (Ref. SHLAA 2016/2017) – so, even if the whole of P4 were included in BHPS1, that adds up to only 4.7ha – with 2.9ha gross (1.0ha nett) missing. This needs to be sorted out.

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Paragraph/section	1 & 2	Policy	DLPBHPS1 (Priority Site)
Site	Waterfront Way & Level Street.	Policy Map	

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Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBHPS1 (Priority Site) Land at Waterfront Way and Level Street.
COMMENT 2 -OBJECTIONS.

(A.) HOUSING DENSITY.

An aim of Policy DLP1 Development Strategy is to create "sustainable mixed communities". The SHLAA 2022/2023 and this Policy DLPBHPS1 claims that the site would accommodate 600 Dwellings at a minimum density of 95DPH. Based on Table 8.2 in Part 1 of this DLP Consultation, at that density, about 92% of the Dwellings would be Flats - and not ideal for Families - which are a crucial component of sustainable mixed communities. This density would likely lead to high proportion of transient occupation which would not achieve that aim - which is a matter of some concern. Based on that scenario, I object to that density of Dwellings

(B.) BUILDING HEIGHTS.

Buildings would need to fit in with Waterfront East which is three storeys. Given the proposed density, I am not convinced that most of the proposed Buildings would not need to be significantly taller than three storeys.

Based on that scenario, I object to that density of Dwellings.

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Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	1 & 2	Policy	DLPBHPS1 (Priority Site)
Site	Waterfront Way & Level Street.	Policy Map	

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Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBHPS1 (Priority Site) Land at Waterfront Way and Level Street.

COMMENT 3 -OBJECTIONS.

CAR PARKING?

* Private Cars are the preferred mode of transport for the vast majority of people – and for the very good reasons that I have given elsewhere. So, there must be adequate Parking provision.

* Waterfront East itself, is seen by Policy DLPBHOS2 as an Opportunity Site with an Entertainment Zone at ground-floor level. Recently, this sort of use has been gradually expanding. If this trend continues, there will be an increased need for Car Parking provision and, if sufficient were not available, the future of the Entertainment Zone envisaged would be in doubt. Although, there are some Parking spaces in front of the ground-floor premises, there would not be enough if Entertainment provision returned to anywhere near the levels seen 15years ago.

* I must also point out that, besides Waterfront East, the Car Park also serves as an overflow Car Park for Waterfront West and the Business Park.

* Given the high density of Housing proposed, I am not convinced that there would be space to provide enough Parking for the needs of the Housing and that of the Waterfront.

The provision of Metro is largely irrelevant because it will only come from and go to the North whereas the catchment area of the Waterfront stretches in all directions.

Therefore, based on that scenario, I object to that density and extent of Housing.

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Question 1. To which document does this response relate? (Please tick one box)

- ☒ Draft Dudley Local Plan, Regulation 18 Part One and Part Two
- ☐ Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan Volume 1 and Volume 2
- ☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan
- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section		Policy	DLPBHPS2 (Priority Site)
Site	Embankment / Daniels Land	Policy Map	

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

Q3. What is the nature of your comment? (Please tick one box)

- ☒ General comment
- ☐ Support
- ☐ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBHPS2 (Priority Site) The Embankment / Daniels Land

COMMENT 1 – CONTRADICTORY INFORMATION.

The Brierley Hill Inset Map shows Daniels Wharf (or Land) as including the following BHAAP Development Blocks (North to South) :- BR16D, BR15G and BR15D.

However, in Draft Dudley Local Plan - Part 1, Appendix 2 Page 436 it says "BR15D has been removed as an allocation" and "BR15G and BR16D has been carried forward as part of a housing allocation DLP BH H002" Clearly, "DLP BH H002" should be DLP BH PS2 – but, other than that, either BR15D has been removed or it has not – the Appendix 2 and the Map contradict each other. So this needs sorting out.

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Respondent No:		Representation No:		Date received:	
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Part C: Comments

Complete one section C per comment on the Local Plan.

Please ensure that you also complete:

section A and B (personal details and declaration) ONCE and submit alongside your section C form(s).

Additional section C forms are available at www.dudley.gov.uk/localplan, by emailing planning.policy@dudley.gov.uk or by calling 01384 814136.

Please complete Questions 1 and 2 if you know this information.

Question 1. To which document does this response relate? (Please tick one box)

- ☒ Draft Dudley Local Plan, Regulation 18 Part One and Part Two
- ☐ Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan Volume 1 and Volume 2
- ☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Dudley Local Plan
- ☐ Supporting evidence base document

Question 2. To which part of the document does this response relate??

Title of document	DRAFT DUDLEY LOCAL PLAN - Part 2		
Paragraph/section	5.j	Policy	DLPBHPS2 (Priority Site)
Site	Embankment / Daniels Land	Policy Map	

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

Q3. What is the nature of your comment? (Please tick one box)

- ☐ General comment
- ☐ Support
- ☒ Objection

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2, or make a comment if you have been unable to answer questions 1 and 2:

Policy DLPBHPS2 (Priority Site) The Embankment / Daniels Land

COMMENT 2 – OBJECTION

Paragraph 5.j. DESIGN PRINCIPLES

Quote: "New development at this location will represent higher density development (likely to be a minimum of 100dph but parts of the site may be appropriate for even higher density development)."

* 300 Dwellings are proposed for this site and the latest SHLAA puts density at 140DPH

* Table 8.2 Dudley Borough Housing Accessibility Standards in Part 1 of this Draft DLP, classifies 100DPH as very high-density 100% Flats and of low suitability for Families.

* So, that density would result in 300 Flats concentrated in quite a substantial area and occupied by few if any families – which is hardly a desirable balance.

An aim of Policy DLP1 Development Strategy is to create "sustainable mixed communities".

I believe that a high proportion of Families is essential to achieve that aim and the proposed density would fail to do that.

* Also at that density, I would expect the necessary buildings to be much higher than the three storeys typical of Brierley Hill Town Centre. That would lead to disruption of the view mentioned in Policy DLPBH2.

So, although I support the provision in principle of Housing on that site, I object to anything near that density of Housing.

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Respondent No:		Representation No:		Date received:	
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SUMMARY COMMENTS.

(A.) The Process.

~>(A.1.) Conducting this Public Consultation during November and December when most people and many businesses are preparing for Christmas, is inappropriate.

It will deter some people from participating and calls into question its validity.

~>(A.2.) The Consultation Documents are lengthy and, in effect, replace the Black Country Plan, the Dudley Borough Development Strategy and the Action Plans for Brierley Hill, Dudley, Halesowen and Stourbridge.

It is virtually impossible to assimilate and consider all of this information in one go and it would have been better to have Consulted on Part 1 first and Part 2 later.

Given inconsistencies and contradictions, I get the impression that the documents have been rushed.

(B.) My Submissions.

~>(B.1.) My focus is on how the various proposed policies would affect Brierley Hill because that is where I have lived all of my life. It is up to the people of Dudley, Halesowen and Stourbridge to consider the effects on their respective Towns.

~>(B.2.) Development should not mean over-development. It must respect the scale, mass, character and heritage of the Town – and preserve and, if possible increase, our Green Open Spaces. I do not want my Home Town to end up looking like a “mini-Brum”.

~>(B.3.) Most people aspire to raising a Family in a House with a garden and having a Car.

Such people are the sound foundations on which diverse, sustainable Communities are built – but there is inadequate catering for them in Brierley Hill now and from what I read in these policies, there would be little, if any, future improvement.

The proposals for Brierley Hill are for high-density to very high-density Housing – overwhelmingly Flats – and inadequate provisions for Cars. With respect to the latter, it is delusional to assume that that would persuade people to opt in their droves to Public Transport and Bicycles.

It hasn't happened to date – and, human nature being what it is, it won't happen in the future.

Unless family-friendly provisions are made, we stand no chance of building a stable Community.