

DUDLEY MBC

Section 2: Your Representation / Comments

Please complete a separate copy of this section for each part of the document(s) you wish to comment on (i.e. Draft Plan or Sustainability Appraisal)

Title of document you are commenting on	Dudley Local Plan
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To which part of the document do your comments relate? Please state the policy number, Dudley Local Plan reference number, paragraph number, page number or figure number

Policy DLP1

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

YES

Please provide your comment below:

Expand this box as necessary. If attaching additional sheets, please clearly mark these with the title of document and part of the document that the comment relates to, and your name.

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.

Housing

West Midlands CPRE objects to the housing supply figure give in Policy DLP 1, 1a, We consider it is too low and that Table 5.1 should be reviewed to take account, in particular, of large windfalls.

We commissioned a review of the housing need and supply (attached) which suggested that 1,019 homes, at a minimum, should be added to the supply to give a more realistic windfall allowance, including some housing from employment sites (in line with Policy DLP21/22) and in town centres (in line with Policy DLP 24/28) which could reasonably be expected over the next twenty years.

We consider some further additional supply could be added based on higher densities as well as reducing the discount rate on industrial sites.

That would mean total supply in Table 5.1 would be at least 11,895 (59 short of the current requirement, but below the current (unneeded) 5% buffer).

This would ensure that even under the Standard Methodology approach espoused by the council there would be sufficient housing to meet the anticipated need and the addition imposed by the Government to meet the 'affordability uplift'.

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However, we consider that there is a case for adopting a figure closer to lower the ONS2016 housing projections. While the CENSUS shows higher base-level housing numbers for Dudley, across the Black Country the CENSUS results level out closest to the ONS2016 need. In other words, viewing the need across the sub-region in a holistic way, would suggest a common approach to each local authority to avoid double-counting and would, in our view, be justifiable under the new provisions of the NPPF (December 2023 Para 61).

That would mean total need in Table 5.1 would be at least 9,306 (without the unneeded 5% buffer).

That would give an excess in Dudley of 2,589 without further release in the Green Belt which could allow for adjacent housing shortfalls (particularly in Sandwell) to be accommodated within the Dudley allocations.

Employment Land

According to the 2023 Dudley Urban Capacity Review, 98 has of employment is required in Dudley, of which 25 has are available from allocations and from small windfalls. Within that supply figure there appears to be no allowance for larger employment land windfalls, even though the cross-boundary BC evidence suggests that could be an important source in the borough. A further 14 has is considered to be specifically related to Dudley from the WMRFI.

The wider BC evidence suggests the sub-region has an overall short-fall of 19.3 has, 33.4 if you exclude land CPRE previously objected to in Walsall's Green Belt. We commissioned a review of employment need and supply (attached), which concludes that this figure does not fully account for already identified land in South Staffordshire, including at the WMRFI, and that supply would will in reality meet that outstanding need.

We, therefore, consider there is no need to include any Green Belt sites in Dudley and the figure of 25 has is appropriate.

Duty to Co-operate

We do not agree with the policy wording on Duty to Cooperate in Part 3 of the Policy. We consider that the needs of Dudley for employment land should be viewed in the context of the Black Country itself and the policy should identify that any shortfall of employment land will be met in other parts of the sub-region.

In terms of housing, we do not consider there is a justified short-fall, but any excess housing within the current allocations should be identified as meeting a short-fall in other Black Country boroughs, notably Sandwell.

This would mean that Para 5.13 should also be redrafted to stress that the need should be met within the Black Country sub-region, and perhaps Birmingham, not the wider GBBCHMA or the FEMA.

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DLP3

What is the nature of your comments? (Mark as appropriate)

General comment	<input type="checkbox"/>	Support	<input checked="" type="checkbox"/>	Objection	<input type="checkbox"/>
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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.

West Midlands CPRE strongly support the protection and enhancement of Green Infrastructure and the maintenance of Green Belt boundaries as well as the emphasis on providing development in sustainable locations as set out Parts 4, 5 and 6 of Policy DLP 3.
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Policy DLP 10

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

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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.

West Midlands CPRE objects to this Policy in line with our objection to Policy DLP 1. We consider there is additional housing supply as set out in the attach report which we commissioned. This would include, in particular a higher level of windfalls in Table 8.1 and create a supply of at least 11,895.

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Policy DLP 11

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

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WM CPRE generally support Policy DLP 11 on Densities, and consider the standards set out in Para 3 appropriate. However, we think the Policy should also require developers to show that they have sought to make the most efficient use of land within a sustainable design approach, as some densities may comfortably be higher than these minima.

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Policy DLP18

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

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WM CPRE supports Part 1 and 2 of this Policy but consider the reference to 'an evidenced functional economic link' unhelpful in Part 3 as it suggests that further employment land could be sought in South Staffordshire (and other more rural districts) rather than in the Black Country itself even though the evidence (as set out in our objection to DLP 1 and the attached report) suggests there is sufficient Black Country urban land to meet those needs.

Paragraph 3 should also be changed to emphasize the primary role of brownfield land in Birmingham and the Black Country in meeting any additional housing need rather than other authorities, although I consider that Dudley has identified enough land that it should be able to identify some of that as meeting neighbouring authorities' needs, and in particular Sandwell.

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Policy DLP 21/22

What is the nature of your comments? (Mark as appropriate)

General comment	<input type="checkbox"/>	Support	<input type="checkbox" value="YES"/>	Objection	<input type="checkbox"/>
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WM CPRE generally supports the reallocation of employment land for housing where the land is not needed for employment use and there is a good case for doing so.

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Policy DLP 24

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

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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.

WM CPRE supports the general approach to centres including the potential for some repurposing including residential development (Part 1) and upper storey residential accommodation (Part 5 (VII))

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Policy DLP 28

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

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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.

WM CPRE generally supports this policy approach to residential housing in centres. However, as well as considering adverse impacts which need avoiding, the policy should stress the potential sustainability of such sites and the role they can play in supporting the viability and vitality of a centre.

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DLP42 - omissions

What is the nature of your comments? (Mark as appropriate)

General comment

Support

YES

Objection

YES

Please provide your comment below:

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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.

CPRE West Midlands supports Policy DLP 42, as far as it goes, but it is deficient in that it fails to deal with energy generation, particularly where it is (and is not) appropriate to locate large solar arrays. It is our view that the right place for this is on rooftops and brownfield land, not on green field and certainly not on Green Belt land. The plan should contain a policy to this effect. See CPRE Rooftop Revolution Report (attached) on this subject.

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Policy 49

What is the nature of your comments? (Mark as appropriate)

General comment	<input type="checkbox"/>	Support	<input type="checkbox"/>	Objection	<input type="checkbox"/>
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<p>WM CPRE strongly supports the protection of Dudley's Green Belt. In line with our comments on Policies DLP1, 10 and 18 we do not consider there is any justification for releasing Green Belt in Dudley or for seeking Green Belt releases in adjoining districts to meet development needs in Dudley.</p> <p>Our view on this is strengthened by the provisions of the new NPPF, published in the final days of this consultation.</p>
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Policy DLP 31-54

What is the nature of your comments? (Mark as appropriate)

General comment

Support

Objection

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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.

WM CPRE is not in a position to comment on the environmental policies in detail. However, we support in general the aspiration to protect the key green and blue infrastructure in the district.

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