

Draft Regulation 18 Dudley Local Plan consultation

<https://dudley.oc2.uk/>

Consultation closing date: 5pm Friday 22nd December 2023

The responses provided below are a joint response from Stratford-on-Avon and Warwick District Councils. Officers from both Councils have had input into the content. Responses are focussed on those areas most likely to impact on the South Warwickshire authorities and the South Warwickshire Local Plan.

Part One: Spatial Strategy and Policies

5. Dudley Borough Spatial Strategy

5.3-5.13 Development Strategy

It is encouraging to note that the Council have produced a Duty to Co-operate statement (October 2023) setting out in detail all the consultations that have been undertaken with the neighbouring and other authorities on housing and employment issues. Paragraph 2.40 of the statement highlights that out of the 11,954 homes needed during the Plan period, 10,876 can be met within the Borough leaving a shortfall of 1,078 homes. It is therefore heartening that Dudley is able to accommodate 91% of its identified housing need within its own borders. Nonetheless, any shortfall will have an impact on other authorities within the Housing Market Area. As a general principle, Dudley Council is encouraged to fully explore all reasonable options in order to meet as much of its own identified need as possible.

The South Warwickshire authorities note that any overspill of unmet housing or employment needs brings with it a need for additional infrastructure in the areas accommodating this overspill, in order to meet the needs of residents and businesses. As such, it is anticipated that any future considerations regarding accommodating overspill within the South Warwickshire area will also need to address these additional infrastructure needs.

8. Housing

8.8-8.14 Housing Density, Type and Accessibility

The principle of establishing minimum densities for new housing, based on location and proximity to services and public transport, is supported. However, it is suggested that the baseline densities are in some cases inappropriately low, given the existing development pattern. It would be expected that many of Dudley's historic Victorian terraces would have densities well in excess of 40 dph, which demonstrates that family housing can be successfully accommodated while optimising densities.

It is also anticipated that calculating the appropriate density for an application site could be complicated and subject to challenge from applicants. There is potential ambiguity existing around whether a particular facility should be used to determine accessibility, what mode of transport to

use, and what distances could be reasonably covered by that mode of transport. It would be clearer and simpler if the Council included on its policies map zones where different minimum densities would apply. For example using buffer distances from public transport and town centres.

8.28-8.31 Housing Development, Extensions and Alterations to Existing Dwellings

Given the shortfall in housing sites for allocation, Dudley Council should act to maximise the amount of new housing that can come forward on windfall sites, and in particular, on existing residential sites. This could be through the development of design codes which set out ways to appropriately densify existing residential areas, for example through infill, additional storeys, sub-division, or replacement dwellings.

9. Employment

9.12-9.16 Providing for Economic Growth and Jobs

Given the shortfall in available employment land, Dudley Council is encouraged to ensure that efficient use is made of the land that is available. While it may not be possible to require a minimum density as happens with housing land, there may be other ways to maximise the economic benefit from employment land.

13. The Borough's Green Infrastructure

13.1-13.6 Green Belt

The Plan does not propose a change to Green Belt boundaries. As the shortfall in Dudley's identified housing and employment need could have been accommodated with a fairly moderate release of Green Belt land, it is disappointing that the rationale and evidence for this decision has not been made clearer. The Council is encouraged to include the rationale in the Plan so that readers can understand whether all reasonable options have been fully explored, and whether the decision not to release Green Belt land is justified. This is of particular relevance to other Councils within the Housing Market Area. The West Midlands Green Belt is extensive, and parts of it fall within the bounds of other HMA members' areas. Dudley Council's decision could therefore have an unintended consequence – by protecting their own Green Belt, Dudley may simply be exporting the harm to elsewhere in the Green Belt.

Part Two: Centres and Site Allocations

No response to this part of the consultation.