

21 December 2023

Dear Sir/Madam

**Draft Dudley Local Plan - Draft Plan Regulation 18 Consultation  
Response made on behalf of the Police Crime Commissioner for West Midlands (PCCWM)**

NB. This consultation response cannot easily be uploaded to the Consultation Portal as it makes multiple comments. This document provides a coherent response to the consultation where the comments relating to individual sections, paragraphs and policies are clearly highlighted.

**Introduction**

The Tyler Parkes Partnership Ltd acts for the Police and Crime Commissioner for West Midlands (PCCWM) and is instructed to make representations on local development documents on behalf of West Midlands Police (WMP) in respect of securing appropriate policy reference in such documents to a range of matters including:

- Recognising the community need for securing safe environments with crime reduction made a priority,
- Promoting a safe and secure entertainment, leisure and evening economy,
- Ensuring the timely and effective engagement with the Police to ensure effective delivery of infrastructure projects required as a result of development growth with the recognition that the police are a social infrastructure delivery agency,
- In appropriate cases, seeking financial contributions towards the additional expenditure burden placed on West Midlands Police as a consequence of development proposals and growth,
- Ensuring the timely and effective engagement of the police in the planning process in relation to matters likely to affect crime and fear of crime, including in relation to Secured by Design and engagement with Design Out Crime Officers as well as Park Mark, and
- Ensuring the timely and effective engagement of the police in relation to Counter-Terrorism matters, e.g. Counter Terrorism Security Advisors can give appropriate advice concerning Vehicle-Borne Devices (VBD) mitigation, Person Borne Improvised Explosive Device (PBIED) mitigation, and Marauding Terrorist Attacks, which are an ever-present threat, and the Crowded Place agenda (particularly in relation to shopping areas and the night-time economy).

The PCCWM welcomes the opportunity to participate in the current consultation, and these representations build on those made previously to planning documents relating to Dudley, including those made on the earlier work on the updating of the Black Country Core Strategy.

These representations should be read in conjunction with those earlier representations. There are a number of matters where the PCCWM would wish to comment and he looks forward to working pro-actively with the Council as the plan moves forward.

### **Introductory observations on Part One of the Draft Local Plan**

Incidents of crime are a characteristic of urban living and it is an unfortunate fact that an increase in the resident population of an area is likely to see a consequential increase in the relative levels of crime taking place. Detailed, up-to-date statistics on the levels and distribution of crime across the West Midlands Police (WMP) area are available online. These data could provide a usual monitoring resource for the Council. They could also be used to provide a brief summary of the incidence of crime in the Profile of the Borough if that was considered appropriate.

The proposals in the emerging local plan for the provision of 10,576 new dwellings and consequential increase in population building on an unfortunate increase in crime levels in recent years (89% in Dudley 2016 to 2022). It therefore follows that:

- The demands placed on the police service are likely to rise as the local population increases.
- The demands on the police are exacerbated by the major changes in the nature of crime and methods needed to deal with it, particularly regarding cyber-related crime and terrorism.
- Significant additional resources will be required to meet the Policing requirements from the rising population. This is likely to include not only additional staff, but also supporting equipment and infrastructure.
- As Dudley's population increases, there is an urgent need to ensure that new development and growth is supported by adequate policing infrastructure, in the interest of creating sustainable communities.

It is also widely appreciated that the careful design of new developments and works to the public realm can help reduce the amount of additional crime generated as the population grows by employing 'Secured by Design' principles. WMP wishes to work on a continuing basis with the Council and other stakeholders involved in the development process to ensure that Secured by Design principles are integral to new development and investment. To this end WMP employs dedicated Design Out Crime Officers whose job is to provide such advice to emerging developments on an ongoing basis.

The PCCWM clearly has a statutory duty to secure the maintenance of an efficient and effective police force for its area and, of course, the Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties, with the aim of achieving a reduction in crime.

The PCCWM requests that in accordance with national planning policy, the theme of community safety and crime prevention is given prominence in the Dudley Local Plan, with appropriate references being included as set out in the following detailed comments.

### Detailed comments on Part One of the Draft Local Plan

**Paragraph 1.4** - mentions health and well-being but there is no mention of safe and secure living environments. The PCCWM requests this is added as it would demonstrate commitment to the importance of these matters to the built environment. [Objection]

**Paragraph 3.2.** This could usefully have an additional bullet making reference to healthy, secure and safe living environments. The PCCWM requests this is added as it would demonstrate commitment to the importance of these matters to the built environment. [Objection]

**Paragraphs 3.8 to 3.10.** The PCCWM wishes to acknowledge and support the reference to resilient and safe communities in the Forging a Future for All Vision and its reflection in the third objective under the priority 'Dudley the safe and healthy borough' as part of the current Corporate Plan, i.e. 'Residents live in safe communities where safeguarding of vulnerable people of all ages protects them from harm and support the prevention of crime and exploitation'. [Support]

**Table 3.2.** While the PCCWM appreciates that it is difficult to encapsulate all of the issues in this analysis, it is felt that the various entries in this table that relate to design quality and infrastructure do tend to gloss over the importance of providing a secure and safe living environment. There is no reference to policing, yet all other public services and infrastructure providers do appear to be picked up. References might be appropriate under the following issues:

- P35 "Delivering homes of a high-quality, **safe** and **secure** design that reflect the character and distinctiveness of the borough' and the proposed policy, 'Design is an overarching concept which interacts directly or indirectly with all other aspects of the plan. Strategic design policies in the DLP aim to form the foundations on which to build future detail and ensure that development is located and designed to create **safe and secure** places for all residents in future.' (Suggested changes in bold and underlined). [Objection]
- P36 "Ensuring access to local services and supporting infrastructure" and "Balancing growth across communities by ensuring that local services and facilities continue to thrive", under column 3 in both entries, amend second bullet to: '• Liaison with health, **West Midlands Police** and education providers'. (Suggested changes in bold and underlined). [Objection]
- P37 "Health, **safety, security** and wellbeing of residents" under the proposed policy

approach, 'The Plan recognises the important role that spatial planning has in the creation of healthy, safe, secure and inclusive communities and that the places that we live in have a fundamental impact on health-quality of life. Many of the policies of the Plan will have an impact on these matters, so it is important that community needs are supported through the provision of appropriate physical and social infrastructure and the built and natural environment, including the public realm, allows for and supports healthy living choices for residents everyone.' The third column could refer to 'Liaison with West Midlands Police'. (Suggested changes in bold and underlined with strikethrough). [Objection]

- P37 "Infrastructure needed to support new growth", under column 3 in both entries, amend second bullet to: '• Liaison with health, West Midlands Police and education providers'. (Suggested changes in bold and underlined). [Objection]

#### The vision for Dudley Borough by 2041, P45/46:

- Amend 4<sup>th</sup> bullet to read, '• sustainable urban growth delivering distinctive, safe and secure places - meeting the needs of its communities and businesses. [Objection]
- Amend 9<sup>th</sup> bullet to read, '• a high quality and beautiful natural, built and historic environment and safe and secure public realm that respects and enhances local character and distinctiveness, including valued historic buildings and areas, and continues to be regarded as a tourist destination, and UNESCO Global Geopark with enhanced tourism facilities'. (Suggested changes in bold and underlined). [Objection]

p48 **Under Objective 3**, amend 'Strategic Priority 5: Creating safe and secure well designed and beautiful places, promoting the health and social wellbeing of communities by:' and also, add additional bullet on the following lines, 'Ensure that the principles of Secured by Design are integral to new development and improvements to the public realm'. (Suggested changes in bold and underlined). [Objection]

**Policy DLP1 Development Strategy**, P54, strengthen wording of: '2.a. Delivering high quality development in the existing urban area supported by infrastructure to meet the needs of communities and businesses supported by the integration of Secured by Design principles. [Suggested changes in bold and underlined). [Objection]

**Policy DLP4 Achieving well designed places**, P71, Strengthen '7. Dudley Borough will be a safe and secure place to live and work in, through organising the urban environment including the public realm in ways that encourage people to act in a responsible manner (see Policy DLP39). All new Development proposals should include consideration of crime prevention measures and will be required to integrate 'Secured by Design' and 'Park Mark principles to provide active frontages, well-located, safe and accessible pedestrian and cycle infrastructure and an

appropriate intensity of use in centres and elsewhere. Designs should promote natural surveillance and defensible spaces. **Proposals should also include a maintenance plan to reduce crime, the fear of crime and anti-social behaviour on an ongoing basis. Developers will be encouraged to seek advice from Design Out Crime Officers where appropriate.** [Objection]. The reasoned justification could helpfully also refer to the types of development where developers should actively seek advice regarding designing out crime. While not exclusive, it is recommended that this should include the following categories of development:

- Major developments
- Houses in Multiple Occupation (HMO)
- Hot Food Takeaways
- Public realm works
- Public transport infrastructure proposals.

The Evidence section to the Policy should include, **Secured by Design** and Delivery should refer to, **West Midlands Police’s Design Out Crime Officers.** (Suggested changes in bold and underlined). **Policy DLP5 Cultural Facilities, Tourism, Heritage, and the Visitor Economy, P75.** This policy should include the following as a new sub-heading and paragraph, **‘Safety and Security 11. An assessment should be undertaken (as part of the design of new developments likely to attract large numbers of people) to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate.’**

The reasoned justification could then refer to the following references, the following policy background. Planning Practice Guidance (Paragraph: 011 Reference ID: 53-011-20190722) recognises that for all locations which will generate crowds in public places, consideration should be given to appropriate security measures in the design of buildings and spaces. Good counter-terrorism protective security can also support wider prevention. The PPG identifies a number of sources of guidance in this respect including ‘Protecting Crowded Places: Design and Technical Issues’, which refers to ‘Secured by Design and ‘Safer Parking’ standards.

The NPPF is clear in its requirement that local planning authorities should anticipate and address possible malicious threats, especially in locations where large numbers of people are expected to congregate. It states at paragraph 97 that, “Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate.

Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase

resilience and ensure public safety and security”.

The footnote to the above paragraph confirms this includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.

The Delivery section to this policy could also refer to **‘Liaison with West Midlands Police’**. [Suggested changes in bold and underlined]. [Objection]

Under **Infrastructure**, Paragraph 6.10 should add **‘Policing facilities’** to the bullet point list of infrastructure investment required to support development and a growing population.

The PCCWM supports **Policy DLP6 Infrastructure Provision** subject to recognition that provision of policing infrastructure is eligible under S106 obligations and CIL. The PCCWM would welcome confirmation in relation to this. It is also important that any studies into viability also take this into consideration. [Support]

Following on from the previous point, and in relation to **paragraph 6.20**, the WMPPC would wish to see the addition of, **‘Policing facilities’** added to the list of eligible infrastructure. [Suggested changes in bold and underlined]. [Objection]

This is compatible with legislation and national planning policy, as follows – Section 17 of the Crime and Disorder Act 1998 states, ‘Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the 15 need to do all that it reasonably can to prevent, crime and disorder in its area’.

The PCCWM therefore has a statutory duty to secure the maintenance of an efficient and effective police force for the area. Dudley Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime.

The NPPF, September 2023, Paragraph 2 states that the NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

Paragraph 7 of the NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development and Paragraph 8 confirms that achieving sustainable development means that the planning system has three overarching objectives: an economic, a social and an environmental objective. These objectives include supporting strong, vibrant and

healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment.

Paragraph 20 of the National Planning Policy Framework (NPPF) includes, inter alia, a requirement for policies to deliver sufficient provision for infrastructure, including those related to security, with Paragraphs 16, 26 and 28 indicating that this could be delivered through joint working with all partners concerned with new development proposals.

Section 8 of the NPPF “Promoting health and safe communities”, Paragraph 92, identifies that planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder and the fear of crime, do not undermine the quality of life or community cohesion.

Paragraph 130 (f) of the NPPF calls for the creation of safe places where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. Annex 2 (NPPF) identifies the police as “Essential local workers”, defined as “Public sector employees who provide frontline services including health, education and community safety” It is also especially noteworthy that Part 10A Infrastructure Levy: England of the Levelling Up and Regeneration Act 2023 confirms at Section 204N (3) relating to Infrastructure Levy regulations that “infrastructure” includes “(h) facilities and equipment for emergency and rescue services”. It should also be noted that it is the case that increases in local population and the number of households do not directly lead to an increase in funding for the Police Service (WMP) from Central Government. It is therefore necessary to secure CIL and/or S.106 contributions for infrastructure due to the direct link between the increased demand for policing services and changes in the physical environment due to new housing and economic growth, which have permanent impacts on future policing and demands upon WMP. Securing contributions towards policing enables the same level of service to be provided to residents of new developments, without compromising the existing level of service for existing communities and frontline services. Put simply, the consequence of no additional funding is that existing infrastructure will become severely stretched and thereby have a severe adverse impact on the quality of the service that WMP are able to deliver.

The High Court judgement of Mr Justice Foskett in *The Queen and Blaby DC and Others* [2014] EWHC 1719 (Admin) is a clear example of the case for S106/CIL contributions towards Police infrastructure. In that case, a development of 4,250 dwellings, community and retail development, schools and leisure facilities was proposed, the judgement reads: “It is obvious that a development of the nature described would place additional and increased burdens on local health, education and other services including the police force.” (Para 11).

The judgement goes on to comment that: “Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe

environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the “consumer view” of the issue.” (Para 61). “I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area.” (Para 62).

To ensure that levels of service can be maintained for both existing residents in the wider Dudley Borough area, developer contributions through the mechanism of CIL and/or S.106 Obligations for Police infrastructure are considered essential.

It is the case that, Planning and S78 Appeal decisions have long recognised that the infrastructure requirements of the Police are perfectly eligible for consideration and can be allocated financial contributions through S106 Obligations which accompany qualifying planning permissions for major development (residential and commercial alike), with the Planning Inspector in PINS appeal reference APP/X2410/A12/2173673) stating that:

*“Adequate policing is so fundamental to the concept of sustainable communities that I can see no reason, in principle, why it should be excluded from purview of S106 financial contributions...”*

Moving onto Section 8 **Housing**, the PCCWM would like to suggest a strengthening of **paragraph 8.2** through the following addition, ‘New housing will be of a well-designed high build quality, meeting national space and water efficiency standards, achieving high levels of energy efficiency, ~~and~~ adapting to climate change **and integrating ‘Secured by Design’ and ‘Park Mark principles.’** [Suggested changes in bold and underlined]. [Objection]

**Paragraph 8.35, Gypsies and Travellers.** The reference to, “...that pitches and plots are well designed in line with Secured by Design principles, and it is recommended that advice is sought from West Midlands Police Design Out Crime Officers” is welcome in itself but it is very important that wider references are made in relation to Secured by Design principles as the rationale is equally strong elsewhere.

**Policy DLP17 Houses in Multiple Occupation**, it is requested that the following additional bullet point is added to the policy, **'All proposals will be expected to demonstrate how the relevant ‘Secured by Design’ principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.'** In addition, the Delivery section should add, **'Liaison with West Midlands Police’s Design Out Crime Officers'**. [Suggested changes in bold and underlined]. [Objection]

**Policy DLP24 Dudley Borough Centres**, the PCCWM suggests strengthening point 6 as follows, '6. Measures to enhance the vitality, accessibility, and sustainability of centres, including maximising **the extent, safety and security of the** public realm, open space, provision of green infrastructure and vehicle charging points, **including integration of ‘Secured by Design’ and ‘Park Mark**



**principles.** will be supported.' In addition, the Delivery section should add, '**Liaison with West Midlands Police's Design Out Crime Officers**'. [Suggested changes in bold and underlined]. [Objection]

One potential omission from this policy is in relation to the specific consideration of proposals affecting Gambling and Alternative Financial Services. There is a case for a specific policy reference on the following lines, "**proposals for all pay day loan shops, pawnbrokers, and gambling uses will take full account of any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the police and other safety organisations.**" [Suggested changes in bold and underlined]. [Objection]

**Policy DLP29 Hot Food Takeaways**, the PCCWM requests that point 3 of the policy be amended as follows, 'In all locations, planning permission for Hot Food Takeaways will only be granted where there would not be an adverse impact on public or highways safety. Regard will be given to:

- a. Existing traffic conditions, including availability of parking spaces.
- b. Availability of safe legal loading areas
- c. Proximity to junctions, pelican crossings, bus bays and bus stops
- d. Accessibility of the site by public transport and cycling
- e. Secured by Design, Park Mark principles, and the need for a maintenance plan to reduce crime, the fear of crime and anti-social behaviour.**

In addition, the Delivery section should add, '**Liaison with West Midlands Police Design Out Crime Officers**'. (Suggested changes in bold and underlined). [Objection]

In relation to **Figure 10.2**, the PCCWM welcomes and supports the inclusion of Secured by Design principles. [Welcome]

**Policy DLP39 Design Quality**, the PCCWM welcomes and supports the references to consideration of crime prevention measures and Secured by Design and Park Mark principles, in addition to the requirements of Part Q of the Building Regulations 2010 or any successor legislation within this policy. and the further guidance in **paragraph 11.95**. In relation to the latter, it is suggested that this could be further strengthened by adding the following sentence, '**Developers are encouraged to undertake pre-application discussions with West Midlands Police's Design Out Crime Officers.**' (Suggested changes in bold and underlined) [Support]

### **Glossary – SBD and Park Mark definitions, p397**

The PCCWM requests that definitions be provided of the following which are referred to in the draft Dudley Local Plan.

**Secured by Design (SBD)** is the official police security initiative that is owned by the UK Police Service with the specific aim to reduce crime and help people live more safely. The Police seeks to

improve the physical security of buildings using products, such as doors, windows, locks and walling systems that meet SBD security requirements. In addition, the Police include proven crime prevention techniques and measures into the layout and landscaping of new developments, such as maximising natural surveillance and limiting excessive through movement.

Through SBD, the Police work closely with builders, developers, local authorities and registered housing associations to incorporate police crime prevention standards from initial concept and design through to construction and completion. West Midlands Police have specially trained Designing Out Crime Officers (DOCOs) who offer police designing out crime and Secured by Design advice free of charge. (NB. based on Secured by Design - [About SBD](#))

### **Park Mark**

The Safer Parking Scheme is a national standard for UK car parks that have low crime and measures in place to ensure the safety of people and vehicles. Each car park undergoes a rigorous assessment by specially trained police assessors and a Park Mark is awarded to each car park that achieves the challenging standards. A Park Mark is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police, meaning the operator has put in place measures that deter criminal activity and anti-social behaviour (NB. based on ParkMark - [About The Scheme](#)).

### **Detailed comments on Part Two of the Draft Local Plan**

By way of introduction to the PCCWM observations on Part 2, it might be helpful to summarise the current intentions regarding the location of WMP premises within Dudley Borough. The new Police HQ for the borough will be provided at Castlegate. This will replace Brierley Hill, Dudley St James' Road and Halesowen facilities. The shared facility (with West Midlands Fire & Rescue Service) at Sedgeley will be retained. Neighbourhood Teams currently located in Brierley Hill (also serving Lye and Stourbridge) and Halesowen will be relocated locally.

**Vision for Brierley Hill**, the PCCWM suggests the following addition, 'a) having strong, resilient, **safe and secure** and thriving communities with enhanced health and well-being, including access to more cultural, leisure and community facilities. (Suggested changes in bold and underlined). [Objection]

On **paragraph 1.9** which deals with design challenges, the PCCWM suggests an additional bullet point, '**Ensure that the principles of Secured by Design are integral to new development and improvements to the public realm**' (Suggested changes in bold and underlined). [Objection]

**Policy DLPBH2 Brierley Hill Design - Landmarks, Views, Vistas and Gateways.** Subject to the

strengthening of the supporting text to Policy DLP39 as referred to above, there is no additional need for further mention of security or safety matters in this policy. It should be noted in relation to points 5 and 8 that Brierley Hill Police Station is due to close. [Comment]

In relation to **Policy DLPBH3 Public Realm in Brierley Hill**, the PCCWM welcomes the emphasis towards public safety within the public realm in this policy. [Support]

**Table 1.1: Summary of Brierley Hill Allocations. The site of Brierley Hill Police Station should be added into the Brierley Hill Civic Core Zone (BH OS1).** The site was previously submitted as part of the Call for Sites. (Suggested changes in bold and underlined). [Objection]. The boundary of allocation DLPBHOS1 on the **Brierley Hill Inset Plan** should be amended accordingly. [Objection]

Given the addition of the site of Brierley Hill Civic Core Zone (BH OS1), the PCCWM would suggest that Policy **DLPBH8 Residential Growth in Brierley Hill** should be revised as follows, '1. Sufficient land will be provided to deliver up to at least 1,636 new dwellings within the Brierley Hill Strategic Centre Inset Plan area during the plan period up to 2041.' (Suggested changes in bold and underlined with strikethrough). [Objection]

**Policy DLPBHOS1 Brierley Hill Strategic Centre Opportunity Site: Brierley Hill Civic Core**, this policy should acknowledge in '**2d. change of use, redevelopment or partial redevelopment of the Police Station Site could include housing.**' (Suggested changes in bold and underlined). [Objection]

**Dudley Town Centre, vision and objectives**, P76, the relocation of the Police HQ serving Dudley Borough to Castlegate Business Park will considerably reinforce Police presence on a 'Primary Gateway' site just beyond the town centre boundary. Notwithstanding this, the new facility will benefit from good quality accessibility by both road (located directly on the key route network) and public transport (Metro) optimising operational requirements.

**Policy DLPD3 Dudley Town Design - Landmarks, Views, Vistas and Gateways.** Subject to the strengthening of the supporting text to Policy DLP39 as referred to above, there is no additional need for further mention of security or safety matters in this policy. It should be noted that the existing Police Station at Dudley St James' Road will close with the Neighbourhood Team relocating to the HQ Police Station. [Comment]

In relation to **Policy DLPD4 Public Realm in Dudley Town**, the PCCWM welcomes the emphasis towards public safety within the public realm in this policy. [Support]

**Policy DLPS4 Stourbridge Town Design - Landmarks, Views, Vistas and Gateways.** Subject to the strengthening of the supporting text to Policy DLP39 as referred to above, there is no additional need for further mention of security or safety matters in this policy. [Comment]

In relation to **Policy DLPBS5 Public Realm in Stourbridge**, the PCCWM welcomes the emphasis towards public safety within the public realm in this policy. [Support]

**Policy DLPH4 Halesowen Town Design -Landmarks, Views, Vistas and Gateways**. Subject to the strengthening of the supporting text to Policy DLP39 as referred to above, there is no additional need for further mention of security or safety matters in this policy. [Comment]

In relation to **Policy DLPBH5 Public Realm in Halesowen**, the PCCWM welcomes the emphasis towards public safety within the public realm in this policy. [Support]

**Table 4.1: Summary of Halesowen Allocations**, p206, the PCCWM welcomes and supports the allocation of the Halesowen Police Station site (DLPHH2) as a housing allocation with a capacity for 30 dwellings. DLPHH2 is also shown as a housing allocation on the Halesowen Inset Plan on p216 which is also supported. [Support]

#### **Sustainability Appraisal of the Dudley Local Plan**

The PCCWM has suggested some improvements that could be made to the objectives of the plan. On examination of the SA, it is clear from Table 2.1 that the appraisal adopts a generic set of different strategic objectives. Is this entirely appropriate? Shouldn't the SA adopt the objectives as set out in the emerging plan? Otherwise, isn't there a risk of divergence when the objective should be the opposite?

Paragraph E1 of the Executive Summary refers to high level environmental protection whereas Paragraph E2 (correctly) identifies that the SA has to consider, and presumably balance, social, economic and environmental performance. This apparent discrepancy should be reviewed as it suggests that the environmental point of the triangle is given greater prominence in the assessment.

I trust this response will be helpful. Please get back to me should you require anything further.

Yours faithfully