

Table 1: Historic England comments on the Dudley Regulation 18 Local Plan consultation, 22 December 2023

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Area of Plan	Historic England comments
Para 2.2/2.3/2.4	We support these paragraphs.
Para 2.28/2.29	We support these paragraphs.
Page 42	Support reference to heritage tourism.
Vision	We support the reference to heritage within the vision.
Strategic Objectives	We would recommend a specific objective for the historic environment, rather than being included with the natural environment. The aims of the objectives are not always the same or it is not always clear how all the different elements have been considered.
DLP1	<p>Clause 2) c we support a reference to heritage within this policy and are keen to ensure that it is the significance of heritage assets, including their setting that are protected and to understand how the Plan has a 'positive strategy' for the historic environment.</p> <p>Clause 3) we are keen to understand what impacts there may be for the historic environment and how these are being considered.</p>
DLP2	The policy would benefit from a reference to the historic environment and how this will be factored into the growth options the Council are pursuing.
Page 63	Beneficial reference to the canal network. Are there any other specifics for the historic environment that the policy will seek to protect/enhance?
Page 64	Beneficial reference to historic town of Dudley. Are there any other specifics for the historic environment that the policy will seek to protect/enhance?
Stourbridge/ Halesowen centres Page 64/65	Are there any specifics relating to the historic environment of these areas that can be referenced and opportunities the Plan is seeking.
Table 5.3	Has there been any assessment of these proposals on the impact of the historic environment and the opportunity for conserving and enhancing heritage assets.
DLP3	The policy would benefit from a clause relating to the historic environment.
DLP4	Positive references to the historic environment. It would be beneficial to provide some additional information for prospective developers on what this type of development may look like. A link to relevant evidence base and/or

	SPD. Additionally, consider re-phrasing clause 9 so that the canal network is protected and conserved through new development.
DLP5	We welcome the inclusion of heritage as a feature within this policy.
Para 5.33	We welcome the inclusion of this paragraph.
Page 86	We would welcome heritage being included in this list so that there are opportunities for heritage enhancement.
DLP7	Clause 6) b we welcome this clause in the policy text.
DLP10/ Table 8.1	At this time, we have not had the opportunity to comment on the specific site allocations included within the Plan. We will look at these in the new year and would then welcome a meeting with the Council to feedback our comments and discuss the heritage impact assessment of the proposed sites. For interest, I attach a link to Historic England Advice Note 3: Site Allocations in Local Plans which you may find useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/
DLP15	At this time, we have not had the opportunity to comment on the specific site allocations included within the Plan. We will look at these in the new year and would then welcome a meeting with the Council to feedback our comments and discuss the heritage impact assessment of the proposed sites.
DLP18	At this time, we have not had the opportunity to comment on the specific site allocations included within the Plan. We will look at these in the new year and would then welcome a meeting with the Council to feedback our comments and discuss the heritage impact assessment of the proposed sites.
DLP19	At this time, we have not had the opportunity to comment on the specific site allocations included within the Plan. We will look at these in the new year and would then welcome a meeting with the Council to feedback our comments and discuss the heritage impact assessment of the proposed sites.
DLP30	We welcome the references to the historic environment within this policy.
DLP34	It would also be worth adding in a section in this policy about hedgerows as a heritage feature and when it will be necessary to safeguard these from development.
DLP35	We support the inclusion of this policy.
DLP36	We support the heritage references within this policy.
DLP37	We support the heritage references within this policy.
DLP39	Clause 2) e amend 'historic' with 'heritage'.
DLP40	The policy would benefit from reference to historic landscapes.
DLP41	Historic England are supportive of a climate change policy, and we have prepared extensive material on our website relating to heritage and the climate agenda. We welcome reference to heritage within Clause 1) h. We would

	recommend rephrasing the policy wording relating to heritage to ensure that appropriate energy efficiency measures are utilised for heritage assets.
DLP42	We welcome the insertion of clause 1) d.
DLP45	We would welcome a clause in this policy on the historic environment and the need for it to be a consideration when planning flood alleviation measures or plans that will affect the watercourse which could have impacts on issues such as waterlogged archaeology etc.
DLP46	A reference within this policy to the potential affects for the historic environment would also be beneficial.
DLP47	We consider it would be more suitable to have a specific clause for the historic environment that considered the issues that might arise and ensured the protection of the significance of heritage assets, including their setting.
DLP51	We consider it would be appropriate to include a clause on heritage as a component of green/blue infrastructure and the role it plays including issues such as heritage landscapes and features.
DLP53	We welcome inclusion of the Leasowes RPG in this policy. Amend 'English Heritage' with 'Historic England'. We would recommend re-phrasing the text to ensure that the heritage asset will be afforded the greatest protection in line with the National Planning Policy Framework (NPPF). Dudley Park should be referred to as a Registered Park and Garden, from Historic England and recognise that this is a heritage asset that requires the protection of Section 16 in the NPPF.
Section 14	We welcome the inclusion of a specific section on the historic environment. We are very supportive of the justification paragraphs which set out the evidence and additional detail that supplements the Plan and will be of use to prospective applicants when preparing planning applications.
DLP55	We support this policy and welcome its inclusion. It is beneficial to see a policy which contains so much of the specific information about your unique local history and provides detail about what and how it should be conserved and protected. Within the opening sections it would be useful to state that development will be supported where it protects and conserves the significance of heritage assets, including their setting or that development will be resisted if this is not the case. This aligns with the NPPF and sets a marker at the start of the policy about the importance of heritage as an 'irreplaceable resource'. We would recommend ensuring that non designated heritage assets are suitably protected and consider the re-wording of clause 8 to be clear on what assessment is required, when it is needed and what it needs to contain. Clause 9 and 10 would also benefit from additional clarification on what is required and when.
DLP56	Any recording should be required to be added to the Historic Environment Record. Clause 1 consider amending the first sentence for clarification.
DLP57	Consider breaking down the clauses in this policy so that each point has its own clause rather than combining them. This will make it clearer to understand what is required by the policy. The first point would be beneficial to reference that development which does not protect the significance of heritage assets, including their setting, will be resisted/

	refused. Any loss/ recording should be added to the HER. Any assessments should be undertaken by appropriate and qualified professionals. It would be useful to set out detail of when a heritage impact assessment may be required and what detail it should include.
DLP58	We welcome the inclusion of this policy. Some of our comments above apply such as breaking down the points in to individual clauses to make it clearer.
DLP59	We welcome this policy.
DLP60	We welcome this policy.
DLP61	We welcome this policy – the opening is a strong clause and this could be replicated in some of the earlier heritage policies to ensure that the opening clauses are strong in resisting inappropriate development. Clause 2 consider re-phrasing to ensure they are given protection – delete wherever possible and ensure that the wording is strong to protect these irreplaceable resources.
DLP62	Consider incorporating significance in clause 2) a. Ensure that the assessment considers the level of harm, whether there are any avoidance and mitigation measures that are suitable or any enhancement opportunities etc.
DLP67	How has the historic environment been considered in the process of assessing transport infrastructure needs? What heritage impact assessment has taken place when assessing which transport networks to allocate/safeguard through this policy?
DLP75	We welcome a reference to heritage within Clause 2) f. We have not commented on the Area of Search at this time. How has the historic environment been assessed in terms of waste proposals?
DLP77	We have not commented on the Area of Search at this time. How has the historic environment been assessed in terms of waste proposals?
DLP78	We consider a clause could be included to safeguard the significance of heritage assets, including their setting.
DLP82	We consider a separate clause should be in the policy to deal with mineral applications and the effects on the historic environment to ensure that all the issues are fully considered, and minerals operations are resisted where it would affect the significance of heritage assets, including their setting. We also consider that there should be a policy on restoration schemes and ensuring that there are appropriate measures in place once mineral operations have ceased.
DLP87	Consider including a clause for the historic environment and protecting the significance of heritage assets which can be affected by noise pollution.
DLP88	We support a reference to heritage within this policy and consider it could state that harm will be avoided to the significance of heritage assets or similar.
DLP89	We support a reference to heritage within this policy and consider it could state that harm will be avoided to the significance of heritage assets or similar.

Part Two	<p>We have not at this time, had the opportunity to comment on the proposed site allocations. We will seek to undergo this in the new year and will be available to discuss with the Council in a meeting to be arranged, if this is considered appropriate. We have provided a link to our advice note, above, relating to proposed site allocations and our expectation of the evidence base used to inform the process. Where any proposed allocations could harm the historic environment, heritage assets and their setting, we would expect to see a heritage impact assessment or similar evidence base and sites either ruled out of the process or any mitigation/avoidance measures incorporated in the Plan as part of site specific policies/ masterplan approaches.</p>
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