

Our ref: KT1123-L-06-11-24
06 November 2024

Dudley Local Plan Publication Plan (Regulation 19) Consultation
Planning Policy Team
Dudley Metropolitan Borough Council
Council House
1 Priory Road
DUDLEY
DY1 1HF

Via email to planning.policy@dudley.gov.uk

Dear Sir/Madam

**Policy DLPKQH1 (Priority Site) Land at Ketley Quarry, Kingswinford
- Completed Representation Form, Dudley Local Plan Publication
Plan (Regulation 19), Consultation October 2024**

Please find attached our completed representation form for the current consultation regarding the Dudley Local Plan Publication Plan (Regulation 19).

The representation form concerns Policy DLPKQH1 (Priority Site) Land at Ketley Quarry, Kingswinford. The form has been completed by Bright & Associates (B&A) (the Agent) on behalf of Urban Remediation (the landowner).

An outline planning application for up to 650 new dwellings at the former Ketley Quarry is currently being considered by Dudley Metropolitan Borough Council (ref. P22/1734). Urban Remediation are the Applicant involved.

Returning to our completed representation form we have provided comments on the consultation documents and those included in the evidence base as summarised overleaf. As directed by the guidance notes provided in the representation form, for answers to Part C: Representation we have completed additional sheets for Q3 where necessary. We have denoted this in our response where applicable. To avoid any misunderstanding we have used a duplicated Part C form rather than a wholly separate sheet thus, it confirms and repeats Q1 and Q2 in these instances.

Please note that all our comments concern Policy DLPKQH1. In answer to Q2 in each instance, based on the documents available at this stage although we find that the Local Plan is legally compliant and complies with the duty to co-operate, we do not consider that the Local Plan is sound. Hence, our response.

Policy DLPKQH1 is a Priority Site for housing. We have provided as much information as possible to support our representation and the suggested modifications in order to make the Local Plan sound. We have particular concerns about the mapped constraints identified for Policy DLPKQH1 together with specific assessments and data provided in the evidence base documents.

In summary, we have provided comments on the following for Policy DLPKQH1. For ease of reference we have included the relevant PDF completed representation form pages:

- Dudley Local Plan Part Two Centres and Site Allocations Publication Version (Regulation 19) (October 2024): Our PDF pages 4-6;
- Dudley Local Plan Regulation 19 Policies Map: Our PDF pages 7-9;
- Sustainability Appraisal of the Dudley Local Plan 2022–2041, Volume 1 of 3: Non-technical summary (September 2024): Our PDF pages 10-12;
- Sustainability Appraisal of the Dudley Local Plan 2022–2041, Volume 2 of 3 (September 2024): Our PDF pages 13-16;
- Sustainability Appraisal of the Dudley Local Plan 2022–2041, Volume 3 of 3: Appendices (September 2024): Our PDF pages 17-19;
- Strategic Housing Land Availability Assessment (SHLAA) 2023-24 Update: Our PDF pages 20-21;
- Dudley Local Plan Viability Assessment (November 2023): Our PDF pages 22-23; and
- Dudley Local Plan Site Assessment Report (October 2024): Our PDF pages 24-27.

As we have indicated in our completed representation form for Q5, we may seek to participate in the examination hearing sessions on behalf of the Applicant to support the allocation of Policy DLPKQH1.

If you require further information regarding our response to the Dudley Local Plan Publication Plan (Regulation 19) Consultation, please do not hesitate to contact me.

Yours faithfully

Mr R. Bright
Principal Consultant
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