

Representation form

Dudley Local Plan Publication Plan

Consultation October 2024



DUDLEY LOCAL PLAN

We are inviting your views on the publication version of the Dudley Local Plan. This form should be used to make comments (known as representations) in response to the consultation.

Guidance notes are available to help you complete this form and can be found online at www.dudley.gov.uk/localplan

The consultation period begins on Friday 18 October 2024, and closes at 5pm on Friday 29 November

Comments can be submitted:

Online: On our online portal available here www.dudley.gov.uk/localplan

By email: planning.policy@dudley.gov.uk

By post: Dudley Local Plan, Planning Policy, Planning & Regeneration, Council House, Priory Road, Dudley, DY1 1HF.

Additional copies of this response form can be downloaded at www.dudley.gov.uk/localplan or a copy can be posted to you - please call us on 01384814136.

This form has three sections:

Section A: Personal details

Section B: A declaration which you will need to read and sign

Section C: Your representation/comments on the Plan, Sustainability Appraisal or supporting evidence.

Please note:

- 1 You can use this form to comment on more than one site and/or policy. For each comment, please tell us the site/policy reference that your comment refers to. A separate form C should be completed for each comment.
2. Responses must include your name and address.
3. Your comments cannot be treated as confidential. By completing this form, you agree to your details being shared and your name and comment (but not your address or other personal details) being made available for public viewing.
4. It is recommended that groups that share a common view send a single response rather than multiple copies of the same response. Please attach a list of the contact details of each person who supports the comments, including their names and addresses.
5. **Completed forms should be received by us no later than 5pm 29 November 2024.**
6. Paper copies of this form and guidance notes can be found in selected libraries - visit www.dudley.gov.uk/localplan for the full list and at Dudley Council House, 1 Priory Road, Dudley, DY1 1HJ.
Individual acknowledgement of receipt will not be possible.



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|----------------|--|--------------------|--|----------------|--|
| Respondent No: | | Representation No: | | Date received: | |
|----------------|--|--------------------|--|----------------|--|

Part A - Personal details

| | 1. Personal details | 2. Agent's details (if applicable) |
|--------------------------------|---------------------|------------------------------------|
| Title | | |
| First name | | |
| Last Name | | |
| Job Title (where relevant) | | |
| Organisation (where relevant) | | |
| House No./Street | | |
| Town | | |
| Post Code | | |
| Telephone Number | | |
| Email address (where relevant) | | |

Notes:

1. If you are responding as an individual (e.g. a resident) you do not need to fill in the job title and organisation boxes unless you are responding as a member of an organisation.
2. If you are an agent responding on behalf of an organisation please ensure that your details are in the Agent's details column and give the details of the client you are responding for in the Personal details column, only the title, name and organisation boxes are necessary.

| Please indicate which of these best describes you / your role in responding to this consultation | |
|--|-----|
| Resident or Individual | |
| Planning Agent or Consultant | |
| Developer or Investor | |
| Landowner | |
| Land & Property Agent or Surveyor | |
| Local Authority | |
| Public service provider e.g. education establishment, health etc | |
| Public agency /organisation | |
| Community or other Organisation | YES |
| Charity | YES |
| Other (please specify in space below) | |
| | |

Please note that copies of all comments received, including the name(s) of the respondent(s) will be made available for the public to view. All other personal details will remain confidential. Dudley Council will process your personal data in accordance with the Data Protection Act 2018. Our Privacy Notice is at the end of this form.

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Part B: Declaration

How we will use your personal information

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the council to contact you if necessary regarding your submission. Your name, organisation and comments will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and in order to protect personal data, we will not publish signatures, telephone numbers, addresses or email addresses on the internet.

Your details will be kept until the Local Plan is adopted plus a further ten years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. When other agencies are involved in Local Plan preparation, we may need to share details about you to enable us to work together for your benefit. Information will only be shared with third parties if they have genuine and lawful need for it. Information shared on this basis will not be reused for any other purpose. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

Please sign and date this form.

Forms signed electronically will be accepted.

Declaration:

By completing and signing this form, I agree to my name, organisation and representations being made available for public inspection on the internet.

Signature: ... 

Date:27 November 2024.....

I understand that in submitting my representations, that my details will be added to the Dudley Local Plan Consultation database and I may be contacted at future stages of the local plan process.

All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ("GDPR"). If you do not wish to be contacted further, please advise us.

No, I do not wish to be contacted about the Local Plan

A copy of our privacy notice is available at <https://www.dudley.gov.uk/privacy-disclaimer-statement/regeneration-and-enterprise-dudley-local-plan-privacy-notice/>

Thank you for taking the time to provide your response.

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Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

Q1. To which part of the document does this response relate?

| | | | |
|--------------------------|---|-------------------|--------|
| Title of document | Dudley Local Plan – Reg.19 version October 2024 | | |
| Paragraph/section | | Policy | DLP1.1 |
| Site | | Policy Map | |

Responses can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy or site in the Dudley Local Plan.

Q2. Do you consider the Local Plan is:

- | | | | | |
|---|----------|-----|--------------------------|----|
| 1. Legally compliant | Y | Yes | <input type="checkbox"/> | No |
| 2. Sound | N | | <input type="checkbox"/> | No |
| 3. Complies with the Duty to co-operate | Y | Yes | <input type="checkbox"/> | No |

(Mark as appropriate)

Please refer to our guidance notes for help with the above definitions - 1 to 3.

Q3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

CPRE Worcestershire is concerned that Dudley MBC is putting forward a plan that fails to meet its objectively assessed development needs in full, though it manages to come fairly close to that. This failure makes the plan unsound at present.

Bromsgrove District

Wherever the deficit is met, it should not be in Bromsgrove District, As it is not an appropriate destination for exported housing (or employment land) need:

Green Belt

Substantially the whole of the undeveloped land in Bromsgrove district is Green Belt. It serves to keep Birmingham and the Black Country separate from the town of Bromsgrove and from the large commuter villages within Bromsgrove District, particularly Hagley, Catshill, Barnt Green, Alvechurch and Wythall, all of which have populations great enough for them to be classified as market towns in more rural regions. The two remaining larger settlements within Bromsgrove District (Cofton Hackett and Rubery) are contiguous to Birmingham and so have no Green Belt gap between them and Birmingham.

Regional Park

National Trust are developing the concept of a Seven Hills Regional Park, stretching from Wychbury Hill in Hagley to Weatheroak Hill in Alvechurch. I am led to believe that this is supported by Bromsgrove District Council and so expected it to be referred to in their plan, which I now expect to be consulted on in the autumn. This is an area of valued landscape. Part (at least) of it was formerly designated as a Landscape Protection Area (or such like) under planning policy of the 1990s. I therefore anticipate that the emerging Bromsgrove Plan will make some provision for its protection.

Landscape

CPRE Worcestershire commissioned research into part of the area (Clent and Lickey Hills), which provided recommendations for areas suitable to be designated as protected landscapes and additional areas to be designated as buffers to protect these. A full version of the report can be downloaded from <https://www.dropbox.com/sh/cu97th78lzka8oy/AAB8UK4FAaeXU-Ttjpic0C7la?dl=0>
Observed from the south, this is a range of hills, but from the north, the elevation above the surrounding area is rather less, because Birmingham and the Black Country (including Dudley) occupy a plateau. It is nevertheless undesirable that Dudley should expand to penetrate the range of hills further.

Land supply

Bromsgrove's last plan was adopted with an explicit policy for a Green Belt Review to provide more land to meet its own housing land supply need. Such a review has not been completed, partly due to difficulties in obtaining evidence on subjects for which Worcestershire County Council was responsible and partly because Redditch's plan (examined and adopted at the same time) estimated a housing need considerably in excess of the need estimated under the Standard Methodology. This meant that land on the edge of Redditch released by Bromsgrove from its Green Belt for the alleged needs of Redditch was not needed for them and could instead supply Bromsgrove's own needs. It nevertheless remains the case that Bromsgrove has scope to meet part of Dudley's land deficit.

Wyre Forest District

The last Wyre Forest Plan may have provided for more housing than it needed, but road communications with Halesowen and Kingswinford are heavily congested at peak times, so that it could not meet a deficit arising in Halesowen. However, the road from their new Lea Castle village to Stourbridge is good and uncongested. Except allocated sites the whole district, east of the river Severn is Green Belt and thus unsuitable to meet Dudley's needs.

Continue on a separate sheet if necessary.

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Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. 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.

Dudley should seek statements of common ground with other authorities (such as Telford and Wrekin), by which they would provide development land to meet Dudley's deficit

Continue on a separate sheet if necessary.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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Q5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note, that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

Q6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

CPRE the Countryside Charity is a leading charity campaigning for good planning. Its primary objective is the protection of rural England, but this includes campaigning for good urban Planning to prevent towns sprawling into the countryside. We wish to be heard in order that the Inspector hears views other than from developers, who are pushing the opportunity to develop sites that they own.

Please note, the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Completed representations forms can be submitted by emailing: planning.policy@dudley.gov.uk

Please enter **Dudley Local Plan Representation** in the subject field of the email.

Alternatively, completed consultation forms can also be submitted by post to: **Planning Policy, Planning Services, Dudley Council, Council House, Priory Road, Dudley DY1 1HF by 5pm 29 November 2024.**

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