**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 Pre-Submision Draft Plan (Reg 19 version) | | |
| **Paragraph/section** |  | **Policy** | DLP3 |
| **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 | X | Yes  X | No |
| 2. | Sound |  | Yes | No **X** |
| 3 | Complies with the Duty to co-operate |  | Yes | No **X** |

*(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.**

**Policy DLP 3 Areas Outside the Growth Network**

Part 5 of the policy confirms that the Council’s Green Belt boundaries will be maintained and protected from inappropriate development. In light of the comments, we have set out in respect of policy DLP 1 above Barberry object to this approach on the basis that maintaining the Green Belt and seeking to direct growth to only previously developed sites will result in housing need being unmet and a shortage of employment land being delivered through the Plan unless the Council is able to agree with other authorities in the HMA for them to accommodate some of this unmet need. As noted previously the Council had intended to release land from the Green Belt when preparing the Black Country Plan in order to not only meet Dudley’s needs but contribute to meeting the wider needs of the HMA. Barberry reiterate that the release of land from the Green Belt within Dudley will help ensure that Dudley is able to meet its housing requirement of 11,169 in full within its own administrative areas without having to resort to its adjoining neighbours. The decision to not release land from the Green Belt to meet Dudley’s needs in full will have a number of adverse consequences for the supply of new homes and particularly the delivery of affordable homes, making the aspiration for home ownership beyond the reach of many who live in the Borough.

Barberry object to the Plan and consider it unsound on the basis that it is not positively prepared nor will be it be effective and that by not reviewing the Green Belt to meet the Council’s housing needs in full within its own administrative areas will result in a number of problems association with lack of adequate housing, housing affordability and knock on economic impacts arising from a lack of working age people able to live and work in the Borough.

*Continue on a separate sheet if necessary.*

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

**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.**

To address our concerns we contend that a review of the Council’s Green Belt should be undertaken and sufficient land released, including land at Swindon Road, Wall Heath, and to be allocated for additional housing development.

*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)

X **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:**

As a promotor with a significant land holding within the Borough that would largely address the Council’s housing shortfall we would welcome the opportunity to present our case in person to the Inspector .

***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**](mailto:planning.policy%40dudley.gov.uk?subject=)

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