

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 Part One		
Paragraph/section		Policy	Policy DLP12 – Affordable Housing
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 | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| 2. Sound | <input type="checkbox"/> | Yes | <input checked="" type="checkbox"/> | No |
| 3. Complies with the Duty to co-operate | <input type="checkbox"/> | Yes | <input checked="" 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.

Objection.

Added to the points made in response to DLP11 around the inability of the draft DLP to deliver the homes generally needed in Dudley (as set out in draft Policy DLP10), draft Policy DLP12 highlights Dudley's worsening housing affordability. It refers to the need for affordable homes in Dudley, as identified in the HMA which could be as high as nearly 400 dpa if realistic assumptions are made about affordability and proportions of household income to be spent on housing.

Policy DLP12 sets a sliding scale of requiring between 10% and 30% affordable housing from qualifying sites. To meet the need for affordable housing, the Plan states that 23.5% of all new housing would have to be affordable. This is clearly unlikely to be the case, noting also that the policy allows for viability assessments to further reduce site contributions, a common occurrence in the Borough and more likely with an urban regeneration focus.

Dudley's worsening affordability, and inability to deliver the affordable homes needed, provides another indicator to justify increasing the draft DLP's planned housing supply further beyond the level it has identified through Policy DLP10 and above the minimum LHN – in order to deliver the affordable homes that are needed in Dudley over the DLP period.

All allocated sites should be tested to evaluate the likely level of affordable housing deliverable – without such evidence, the ability of the plan to meet full housing needs for affordable homes is not possible. As nearly one quarter of the suggested supply is in commitment, the level of affordable housing from these sources should be known (and discounted in part for expected non delivery) and the implications assessed.

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.

The need for affordable homes is greater than stated if realistic assumptions are made as to the percentage of household income to be spent on accommodation is to be used. Affordable housing policy will not meet affordable housing needs. Viability will be prevalent and will reduce affordable housing levels such that the plan will not meet needs. Site allocations need to be tested on a site specific basis to understand the level of affordable housing and the implications assessed. The contribution to affordable needs from commitments needs also be assessed in the same way.

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:

The issues raised and nature of objections means that the examining Inspectors would benefit from further oral submissions being made to fully explore the topic.

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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