

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 Two		
Paragraph/section		Policy	Policy DLPD1 – Dudley Town Centre Allocations inc Table 2.1 Allocations and Policies DLPDPS1 and 2
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.

Policy DLPD1 and Table 2.1 seeks to identify a number of sites within the Dudley Town Centre which it suggests are appropriate for residential development. Whether or not the sites are appropriate for residential development in principle, the Policy and allocations are objected to. The sites will not deliver the scale and nature of residential development as proposed in the Policy/Allocations. Only detailed provisions are set out in respect of the Priority Sites and no similar level of detail is provided in justification for the other allocated sites listed.

The objections here are set out in the context of representation set out elsewhere in these objections on behalf of Persimmon Homes to the overall development strategy which places too much of a reliance on untested and challenging urban regeneration sites, repeating the likely under delivery of previous plans which were acknowledged to have failed. Whilst these locations could still accommodate some development, it must be part of a more balanced portfolio of deliverable sites.

The expected delivery of housing suggested in this Policy is not deliverable over the plan period, places too greater emphasis on these locations without clear evidence on deliverability, market evidence on demand or housebuilder interest and clear transparent trajectory on delivery (this noting the appended Trajectory which is absent of any detailed explanation or detailed list of supply sites which contributes to the annual expected delivery).

There is no evidence to support and justify the sites, the scale of development or the trajectory of delivery noting clear and obvious challenges to these sites within the Policy coming forward and include (but are not limited to);

- Multiple land ownerships constraining delivery
- Timeframes, costs and issues associated with land acquisition
- Relocation of existing businesses and uses on site, including business viability to move and the availability of alternative suitable premises
- Land contamination
- Land stability and former historic uses
- Levels and the impact on development quantum.
- Accessibility and ability to connect to key services and facilities
- Access to schools and other required infrastructure
- Noise implications given adjoining uses and highway infrastructure
- Flood Risk and the application of the sequential test
- Unsuitability of service and key development infrastructure
- Absence of any evidence to show the sites can meet the policy requirement for all sites to contribute to required development infrastructure under Policy DPL6.
- Evidence to show the ability of accommodating policy requirements for sustainable drainage and BNG
- Viability generally
- Ability to accommodate other general sustainable building policy requirements viably.
- Market interest to deliver the development
- Market interest for the units to be provided
- The alignment of units to be delivered to HMA needs identified.
- Impact of panoramic view cone, strategic and local views on development potential
- Retention of protected and other trees and green infrastructure and the ability to provide gains in such, and the impact on development potential.

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 contribution to the supply of housing from these suggested site allocations is unrealistic and should be comprehensively reviewed including that set out within Table 2.1 as well as the trajectory under DLPDPS1 and 2 which is unrealistic. The Plan places too much reliance on housing from these locations without any detailed evidence on deliverability or addressing key issues as above which should be fully expected for each allocation. Where these sites have been part of previous plan strategies and not delivered, the plan cannot place reliance on delivery of housing at these levels from these sites. The scale of housing proposed is significantly in excess of what could be expected to be delivered within the Plan period. The expected supply needs to be significantly reduced and the trajectory adjusted to more realistic and deliverable levels.

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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