

## 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?

<b>Title of document</b>	Dudley Local Plan Part One		
<b>Paragraph/section</b>		<b>Policy</b>	Policy DLP11 – Housing Density, Type and Accessibility
<b>Site</b>		<b>Policy Map</b>	

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.

The plan acknowledges that it is important that the new homes delivered over the plan period are located in places with good sustainable transport, access to key residential services and provide a mix of types and densities which are appropriate to their location and help meet local needs.

The Policy is prescriptive in that the density and type of housing to be provided should reflect local needs and the accessibility of the site. Great emphasis is placed upon high density 100 dph development in accessible locations, with other standards seeking to push development densities to high levels.

Concerns are set out here about this approach on the basis that firstly the approach doesn't align with needs set out in the Housing Market Assessment. Within the HMA Update and reflected in Table 8.3, nearly 50% of needs are for properties with 3 or 4 bedrooms, more typical of family housing. The extent to which this can be accommodated at high densities within the urban area is unrealistic, indeed a number of the sites allocated in the Plan would be unrealistic for this major housing need.

Secondly the densities set out in policy have not been market tested. The extent to which they are both realistic to be taken up in the market and in demand has not been set out in the evidence. Whilst such an approach conveniently increased the theoretical urban capacity, there is nothing in evidence to suggest these high density forms of urban living will be realistically deliverable within Dudley, when they are still challenging in many other more buoyant market locations such as Birmingham City Centre for example.

*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.**

Further consideration is needed as to the affects of prescriptive policy on density, the types of urban sites allocated and the nature of the housing need identified in the HMA which identifies nearly half of the proposed need being within 3 and 4 bed dwelling types.

Evidence of market interest and deliverability of this density needs to be part of the market evidence for the plan, given such high densities pose a significant risk to the delivery of housing.

*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](mailto: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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