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From: [REDACTED]
Sent: 27 November 2024 20:27
To: Planning Policy
Subject: [EXTERNAL EMAIL] Representations to Dudley Local Plan Reg 19 Consultation
Attachments: E Lovett Reps Nov24.pdf

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Dear Sirs,

Please find enclosed representations to the Regulation 19 Consultation.

As a local resident of Wollaston, and a chartered town planner working in the West Midlands, I am really disappointed with the approach the Council is taking in this Plan.

As I have tried to express in the attached forms, the Council has neglected to advance a plan to actually meet its housing needs, in full, across at least a 15 year period post-adoption. That is contrary to so many requirements of national policy for plan-making, as set out in the Framework. If the Council truly wants a plan-led system, then it should be making sure that the Plan will do so.

The report to full Council on 2 December demonstrates that the Council are seeking to fast-track this Plan through to examination and adoption in order to avoid the increase to local housing need, once the changes to the standard method are implemented (assuming this is done as the consultation version of the Framework suggested). What the report to Council does not consider, is how the responses to the statutory consultation will be considered and responded to. It is very clear that regardless of the content of those representations, that Council is seeking permission to roll on to the submission of the Plan as soon as it can. This is clearly not what consultation is intended for, and it is disappointing that the Council does not care what local residents, or businesses, think about the proposed approach.

The Council has plainly failed to reach agreement with neighbouring authorities regarding unmet housing needs, and yet is relying on neighbouring authorities to assist in meeting its housing shortfall. Planning guidance makes it clear that the Duty to Cooperate cannot be resolved retrospectively at examination, and there are numerous examples of plans that have failed at examination because of this. The Council should consider whether it is appropriate to waste taxpayers money on pursuing a Plan through examination, that plainly does not meet the requirements for plan-making based on national policy and legislation.

Finally, it is questioned why the Plan is SO LONG. Why are there so many policies? Why are the policies themselves so long? National policy sets out in Paragraph 16 of the Framework what Plans should do, and the Council should consider whether the Plan, in all its 700 pages, is meeting these requirements. It may be more appropriate to pursue some of these aspirations through SPDs or SPGs. The Plan as currently drafted is not accessible, it is not clearly written and unambiguous, and frankly it is not clear how it should be used to shape development in many cases.

I hope that these responses are considered by the Council before the Plan is pursued through examination.

Kind regards,

Eleanor Lovett

