

Representation form

Dudley Local Plan Publication Plan

Consultation October 2024



We are inviting your views on the publication version
be used to make comments (known as representati

Guidance notes are available to help you complete this form and

The consultation period begins on Friday 18 October 2024,

Comments can be submitted:

Online: On our online portal available here www.dudley.gov.uk

By email: planning.policy@dudley.gov.uk

By post: Dudley Local Plan, Planning Policy, Planning & Regeneration, Council House, Priory Road, Dudley, DY1 1HF.

Additional copies of this response form can be downloaded at www.dudley.gov.uk/localplan or a copy can be posted
to you - please call us on 01384814136.

This form has three sections:

Section A: Personal details

Section B: A declaration which you will need to read and sign

Section C: Your representation/comments on the Plan, Sustainability Appraisal or supporting evidence.

Please note:

- 1 You can use this form to comment on more than one site and/or policy. For each comment, please tell us the site/
policy reference that your comment refers to. A separate form C should be completed for each comment.
2. Responses must include your name and address.
3. Your comments cannot be treated as confidential. By completing this form, you agree to your details being shared and
your name and comment (but not your address or other personal details) being made available for public viewing.
4. It is recommended that groups that share a common view send a single response rather than multiple copies of the
same response. Please attach a list of the contact details of each person who supports the comments, including their
names and addresses.
5. **Completed forms should be received by us no later than 5pm 29 November 2024.**
6. Paper copies of this form and guidance notes can be found in selected libraries - visit www.dudley.gov.uk/localplan
for the full list and at Dudley Council House, 1 Priory Road, Dudley, DY1 1HJ.

Individual acknowledgement of receipt will not be possible.

Local Plan. This form should
e to the consultation.

e at www.dudley.gov.uk/localplan

m on Friday 29 November

For official use only

Respondent No:		Representation No:		Date received:	
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Part A - Personal details

	1. Personal details	2. Agent's details (if applicable)
Title	Mrs	
First name	Eleanor	
Last Name	Lovett	
Job Title (where relevant)		
Organisation (where relevant)		
House No./Street		
Town		
Post Code		
Telephone Number		
Email address (where relevant)		

Notes:

1. If you are responding as an individual (e.g. a resident) you do not need to fill in the job title and organisation boxes unless you are responding as a member of an organisation.
2. If you are an agent responding on behalf of an organisation please ensure that your details are in the Agent's details column and give the details of the client you are responding for in the Personal details column, only the title, name and organisation boxes are necessary.

Please indicate which of these best describes you / your role in responding to this consultation	
Resident or Individual	X
Planning Agent or Consultant	
Developer or Investor	
Landowner	
Land & Property Agent or Surveyor	
Local Authority	
Public service provider e.g. education establishment, health etc	
Public agency /organisation	
Community or other Organisation	
Charity	
Other (please specify in space below)	

Please note that copies of all comments received, including the name(s) of the respondent(s) will be made available for the public to view. All other personal details will remain confidential. Dudley Council will process your personal data in accordance with the Data Protection Act 2018. Our Privacy Notice is at the end of this form.

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Part B: Declaration

How we will use your personal information

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the council to contact you if necessary regarding your submission. Your name, organisation and comments will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and in order to protect personal data, we will not publish signatures, telephone numbers, addresses or email addresses on the internet.

Your details will be kept until the Local Plan is adopted plus a further ten years to evidence that a fair and transparent process has been followed. Processing is kept to a minimum and data will only be processed in accordance with the law. When other agencies are involved in Local Plan preparation, we may need to share details about you to enable us to work together for your benefit. Information will only be shared with third parties if they have genuine and lawful need for it. Information shared on this basis will not be reused for any other purpose. We will take all reasonable precautions to protect your personal data from accidental or deliberate loss or unauthorised disclosure.

Please sign and date this form.

Forms signed electronically will be accepted.

Declaration:

By completing and signing this form, I agree to my name, organisation and representations being made available for public inspection on the internet.

Signature: 

Date: 20 November 2024

I understand that in submitting my representations, that my details will be added to the Dudley Local Plan Consultation database and I may be contacted at future stages of the local plan process.

All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ("GDPR"). If you do not wish to be contacted further, please advise us.

No, I do not wish to be contacted about the Local Plan ☐

A copy of our privacy notice is available at <https://www.dudley.gov.uk/privacy-disclaimer-statement/regeneration-and-enterprise-dudley-local-plan-privacy-notice/>

Thank you for taking the time to provide your response.

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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 1 Spatial Strategy and Policies		
Paragraph/section	Introduction	Policy	
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

☒ Yes

☐ No
2. Sound

☐ Yes

☒ No
3. Complies with the Duty to co-operate

☐ Yes

☒ 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 Council should recognise the changing context of plan-making at a national level, in particular the proposed changes to the standard method. Whilst this Plan could benefit from the transitional arrangements and not plan for that higher level of housing need, the Council should consider whether this is really appropriate and the best use of local resources. As the standard method will likely increase housing needs substantially in the District, the Council will inevitably come under pressure to do an early or immediate review once this Plan has been adopted in any case.

The proposed plan period is also considered to be inadequate, and has been based on the assumption that the Plan will be adopted in 2026. Whilst this could be achievable, this is dependent on a quick examination process, the timescales of which are not within the Council's control. It is considered that a buffer of at least a further year or two should be added to the plan period to avoid this becoming an issue once the Plan has been submitted for examination, with the additional housing and employment land required for those extra year(s) also added prior to the submission of the Plan. This is critical in order that the Plan appropriately plans for at least 15 years post-adoption, as required by the Framework.

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.

Consider whether the Plan should be seeking to deliver a higher level of housing, in line with the emerging Standard Method calculation.

Extend the plan period, and allocate additional sites to respond to that.

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.*

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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:

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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 1 Spatial Strategy and Policies		
Paragraph/section	Spatial Strategy	Policy	Policy DLP1
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 | ☒ Yes | ☐ No |
| 2. Sound | ☐ Yes | ☒ No |
| 3. Complies with the Duty to co-operate | ☐ Yes | ☒ No |

(Mark as appropriate)

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The Council is failing to plan for sufficient housing to meet the Borough's needs, contrary to the requirements of national policy, or good practice for plan-making. The Government advocates a plan-led approach to development, but the Council has not done so through this publication draft Plan. Relying on neighbouring authorities is inappropriate in a context of significant unmet housing needs elsewhere, with limited options as to how these can be met. The Council should, at least, be planning through this Local Plan to deliver an appropriate level of housing, in order to ensure that local housing needs will be met.

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Modify the spatial strategy so it is predicated on meeting the local housing needs in full, and, where necessary and appropriate, providing a contributing towards neighbouring authorities unmet needs.

Continue on a separate sheet if necessary.

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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 1 Spatial Strategy and Policies		
Paragraph/section	Spatial Strategy`	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

☒ Yes

☐ No
2. Sound

☐ Yes

☒ No
3. Complies with the Duty to co-operate

☐ Yes

☒ 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.

Whilst this Plan benefits from the proposed transitional arrangements set out in the draft NPPF (which is likely to become the actual NPPF by the end of 2024) the Government encouragement of review and release of Green Belt should be considered by the Council. As this Plan currently fails to plan for sufficient housing to address local housing needs in full, it is clear that the previous Plan-led approaches of focusing on sites within built up areas and regeneration corridors will not be sufficient going forward. As such, the Council should be considering other opportunities to meet housing needs on a strategic scale, which may require the review and release of Green Belt.

Continue on a separate sheet if necessary.

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- ☒ **No**, I do not wish to participate in hearing session(s)
- ☐ **Yes**, I wish to participate in hearing session(s)

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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 1 Spatial Strategy and Policies		
Paragraph/section	Housing	Policy	DLP10
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 | ☒ Yes | ☐ No |
| 2. Sound | ☐ Yes | ☒ No |
| 3. Complies with the Duty to co-operate | ☐ Yes | ☒ 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.

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This policy is proposing to deliver 10,470 new dwellings, despite this being less than the identified local housing needs for the plan period. This should be rectified, with sufficient housing allocations to meet the need in full, identified.

A secondary concern relates to the sites proposed to be allocated. It is apparent that the Council is proposing to allocate sites that have either already been, or are in the process of being, delivered. This is clearly not what plan-making is for, and the Council should consider whether the proposed allocation are available and/or deliverable.

Overall, it is considered that before the Plan progresses any further, the approach to housing allocations should be reviewed. Where sites have already been delivered, these should not be proposed to be allocations, and instead further sites should be allocated to contribute towards meeting the Borough's housing needs, in full.

Continue on a separate sheet if necessary.

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Delete allocation that have already been delivered. Allocate additional sites to meet the housing needs in full.

Continue on a separate sheet if necessary.

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- ☐ **Yes**, I wish to participate in hearing session(s)

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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 2 Centres and Site Allocations		
Paragraph/section	3. Stourbridge - Vision	Policy	
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

☒ Yes

☐ No
2. Sound

☒ Yes

☐ No
3. Complies with the Duty to co-operate

☒ Yes

☐ No

(Mark as appropriate)

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Support the proposed vision for Stourbridge, particularly the recognition of the importance of walking and cycling routes, as well as the 'rediscovery' of the River Stour. Also strongly support reducing the severance effect of the ring road, although this will be challenging.

Continue on a separate sheet if necessary.

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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 2 - Centres and Allocations		
Paragraph/section		Policy	Policy DLPS2 Stourbridge Wharf
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

☒ Yes

☐ No
2. Sound

☒ Yes

☐ No
3. Complies with the Duty to co-operate

☒ Yes

☐ No

(Mark as appropriate)

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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.

Strongly support part 5 of the policy, and proposals to improve connectivity. This is a real opportunity to improve this part of the town and encourage people to walk and cycle, particularly between residential areas and useful facilities, such as Lion Health.

Continue on a separate sheet if necessary.

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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 2 Centres and Allocations		
Paragraph/section		Policy	
Site		Policy Map	Figure 3.2

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

☒ Yes

☐ No
2. Sound

☒ Yes

☐ No
3. Complies with the Duty to co-operate

☒ Yes

☐ 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.

Support the vision identified within this figure, and identification of key gateways and areas where pedestrian links need to be improved. However, think there is too much information that is trying to be shown on one plan, and this should be simplified so it is clearer for people to interpret.

One further linkage that could be considered is to the west of Lion Health, where the River Stour bends beyond Riverside House. There could be an opportunity to link up existing woodland/ open space at Wollaston Rec, with the open space between the River and Canal, and recreational routes beyond. This seems like a missed opportunity.

Continue on a separate sheet if necessary.

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Respondent No:		Representation No:		Date received:	
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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.

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:

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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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 2 - Centres and Allocations		
Paragraph/section	9. Local Green Space	Policy	
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 | ☐ Yes | ☒ No |
| 2. Sound | ☐ Yes | ☒ No |
| 3. Complies with the Duty to co-operate | ☐ Yes | ☒ 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.

I strongly object to the proposed designation of Land at Corbett Hospital, as a Local Green Space. It is a wholly inappropriate proposal, that has been pursued by a group of residents purely as a way to frustrate proposals by the NHS to seek permission for housing on the site. The land is an anomaly in the urban area, remaining in agricultural use despite the development of Stourbridge around it. It has long since lost its role as historic parkland, and has no public access. Visually the site is well enclosed, with limited views available from public vantage points. If the Council wants to pursue this as a Local Green Space, it should explain how the designation is consistent with Paragraph 105 of the Framework, which requires that such designations are consistent with planning of sustainable development and complement investment in homes, jobs and other essential services. aaa

Furthermore, the Council has prepared a Plan that fundamentally does not allocate enough sites for housing or employment, relying on neighbouring authorities to shoulder its unmet needs. This is clearly not consistent with the requirement of Paragraph 35 of the Framework for Plans to be 'positively prepared' meeting the area's objectively assessed needs in full, as a minimum. As such, the Council should reconsider whether this allocation is necessary or appropriate as a Local Green Space, and consider whether there is a positive opportunity to seek some form of development on this site, to go some way to meeting the housing shortfall.

Continue on a separate sheet if necessary.

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Respondent No:		Representation No:		Date received:	
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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.

Delete DLPLGS1.

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:

***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.*

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