

# Representation form

## Dudley Local Plan

### Publication Plan

Consultation October 2024



DUDLEY LOCAL PLAN

We are inviting your views on the publication version of the Dudley Local Plan. This form should be used to make comments (known as representations) in response to the consultation.

Guidance notes are available to help you complete this form and can be found online at [www.dudley.gov.uk/localplan](http://www.dudley.gov.uk/localplan)

**The consultation period begins on Friday 18 October 2024, and closes at 5pm on Friday 29 November**

Comments can be submitted:

**Online:** On our online portal available here [www.dudley.gov.uk/localplan](http://www.dudley.gov.uk/localplan)

**By email:** [planning.policy@dudley.gov.uk](mailto: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](http://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](http://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.



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Respondent No:		Representation No:		Date received:	
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### 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	
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	YES
Charity	YES
Other (please specify in space <i>below</i> )	

**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: .....29 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?

<b>Title of document</b>	Dudley Local Plan – Reg.19 version October 2024		
<b>Paragraph/section</b>	13.18	<b>Policy</b>	DLP55
<b>Site</b>	Wychbury Hill	<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                    | <b>Y</b> | Yes | <input type="checkbox"/> | No |
| 2. Sound                                | <b>N</b> |     | <input type="checkbox"/> | No |
| 3. Complies with the Duty to co-operate | <b>Y</b> | Yes | <input 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.

This objection concerns the land within the Borough on the slopes of Wychbury Hill, bounded by the Borough boundary; Hagley Road, Pedmore; Pedmore Hall Lane and Pedmore Lane. The plan will be unsound unless particular protection is provided to it as an area of Great Landscape Value and a Local Green Space.

I note (and welcome) DLP35 (Geodiversity), DLP49 (Green Belt), para 13.18 (8 Hills Regional Park), DLP52 (Geology). However, in view of the likelihood that the present government will pressurise Dudley MBC to undertake a Green Belt Review, it is desirable that this plan should provide the maximum possible protection for the best landscape assets in the Borough.

It would be good if the Plan could contain an explicit policy supporting so much of 8 Hills Regional Park as is within the Borough. I appreciate that this is currently only an emerging proposal, but it is in Dudley MBC's power explicitly to endorse the National Trust's proposals by means of a Policy in this Plan, which will carry much more weight than mere warm words in the supporting text.

Wychbury Hill is important:

- It is a landscape feature visible for many miles.
- It is crowned by a multivallate Iron Age hillfort, of which about one-third is within the Borough.
- The other two-thirds are part of the Hagley estate and probably within the designation of Hagley Park as Grade 1 registered parkland. The designation of the rest of the hill will serve to protect the setting of the registered park
- A geological exposure is specifically mentioned as a feature of the Black Country Geopark.
- I understand that the emerging Hagley Neighbourhood Plan intends to provide some landscape designation for the land below the summit of Wychbury Hill within Hagley, so that a similar designation of the land around Pedmore Hall within the Borough would be welcome. (I am on the committee preparing the Neighbourhood Plan, but it is only at the stage of formulating proposed policies.

Attention is drawn to the report prepared for CPRE on the Landscape of the Clent and Lickey Hills. I (as chairman of CPRE Worcestershire) ensured that the area covered included the area described in the first paragraph above. A copy of the report is attached. This version has had to be compressed to making it Internet-friendly. The full report can be downloaded from <https://www.dropbox.com/sh/cu97th78lzka8oy/AAB8UK4FAaeXU-Ttjpic0C7la?dl=0>

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 area on the slopes of Wychbury Hill, bounded by the Borough boundary; Hagley Road, Pedmore; Pedmore Hall Lane and Pedmore Lane should be designated as an area of Great Landscape Value and a Local Green Space.

The Plan should contain a specific policy supporting the creation of an 8 Hills Regional Park (so far as it is within the Borough) and should contain policies to protect the land within it from development.

*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:**

I am a resident of Stourbridge Road Hagley, the continuation of Hagley Road, Pedmore and am a member of Hagley Parish Council and chairman of the Worcestershire Branch of the Campaign to Protect Rural England.

CPRE the Countryside Charity is a leading charity campaigning for good planning. Its primary objective is the protection of rural England, but this includes campaigning for good urban Planning to prevent towns sprawling into the countryside. We wish to be heard in order that the Inspector hears views other than from developers, who are pushing the opportunity to develop sites that they own.

*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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