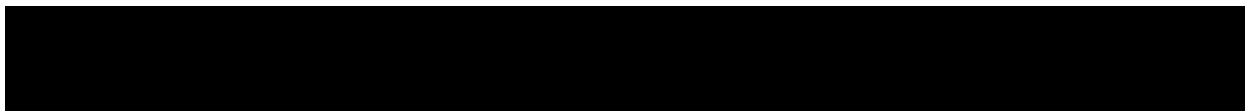


Representations to Dudley Council's emerging Draft Local Plan Review Publication Stage Consultation Report (Regulation 19) (October 2024).

Representation prepared by:



Goldfinch Town Planning Services (West Midlands)



12 November 2024



Goldfinch Town Planning Services (West Midlands)





Goldfinch Town Planning Services (West Midlands)
Facebook ■ Goldfinch Town Planning Services

Goldfinch Town Planning Services (West Midlands) has been instructed to submit this 'made' Representations Statement report on [REDACTED]

This Representation is submitted in connection to the above Local Plan Review public consultation stage, which runs until Friday, 29th November 2024.

This Local Plan Representation has been submitted by e-mail to the following public consultation address on the 12th November 2024:

planning.policy@dudley.gov.uk

On behalf of our clients, Goldfinch Town Planning Services welcomes the opportunity to enter into constructive and meaningful dialogue with Dudley Council's Planning Policy Team in connection to the council's emerging Local Plan Review.

Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the permission of [REDACTED]

[REDACTED] Both Goldfinch Town Planning Services (West Midlands) and our clients accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

**Representations to Dudley MBC's emerging Local Plan (Review)
Draft Publication Stage Consultation Report (Regulation 19)
(October 2024).**

- Comment Form

Part A – Personal Details

**Dudley Metropolitan Borough Council's emerging Local Plan (Review)
– Draft Publication Stage Consultation Report (Regulation 19) (October
2024)**

[Redacted content]

[Redacted content]

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

Type of Representation: Is this Representation supporting or objecting to Dudley Council's emerging Local Plan (Review) Draft Publication Stage Consultation Report (Regulation 19) (October 2024)?			
Supporting		Objecting	X
We are neither supporting or objecting to this specific public consultation stage		Supporting with concerns	

Part B

Name of organisation submitting representation	Goldfinch Town Planning Services (West Midlands) on [REDACTED]
--	--

3. To which part of the Local Plan relate?	
Paragraph	See further below Representation
Policy	See further below Representation
Policies Map	

4. Do you consider the Plan is:					
(1) Legally compliant		Yes		No	X
(2) Sound		Yes		No	X
(3) Complies with the duty to co-operate		Yes		No	X

5. 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.

See our Representation further below.

(Continue on a separate sheet /expand box if necessary)

6. 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 5 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.

See our Representation further below.

(Continue on a separate sheet /expand box 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.

7. 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)		X	Yes, I wish to participate in hearing session(s)
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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.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our clients are objecting to the Dudley Local Plan Regulation 19 – Part Two report. In particular, proposals to bring forward a major new housing site allocation within the Dudley Local Plan (DLP) via Site reference = DLP H004. Site name: Caledonia sewage works. Proposed use: Residential. Indicative capacity: 140 new build residential units. Dudley Council's site classification: Brownfield. Regeneration Corridor: RC3. (The site allocation in question is referred to on page 209 of the Dudley Local Plan Regulation 19 – Part Two report).

We are unable to support and strongly refute Dudley Council's Planning Policy Teams suggestion that the site in question forms an urban brownfield site (previously developed land). Robust, defendable and up-to-date photographic evidence contained within this Local Plan Representation demonstrates that the site in question forms a green field site, which contains areas of semi-mature urban woodlands, and extensive heavily vegetated green space areas. The former sewage works tanks and associated concrete hard-standings have now all since long blended back into the landscape and reverted to a greenfield site. This matter brings into question the approach taken towards the classification of other housing site allocations across the borough which are being brought forward through the council's Reg 19 Local Plan Review.

Goldfinch Town Planning Services (West Midlands) and our clients have considerable planning policy concerns that Dudley Council's Publication Stage Report (Regulation 19) (October 2024) public consultation report is an unsound plan, is insufficiently robust and is failing the various tests of 'Soundness' for Local Plan preparation as reinforced within paragraph 35 (indents a to d) of the Revised National Planning Policy Framework (NPPF) (December 2023).

We have concerns that the Caledonia former sewage works site has been included as a major housing site allocation within the council's Publication Stage Report. This area forms a critically important strategic wildlife corridor and provides a range of important climate change resilience features within the surrounding heavily urbanised area. On this basis, the emerging Local Plan Review is failing the "Sustainability" test of Soundness set out within paragraph 35 (indent d) of the Revised NPPF (2023). This site has also failed to come forward over the last 23 years despite being allocated in numerous previous other Dudley Borough Local Plan Reviews, and despite having a longstanding planning consent to re-develop this site for major new build housing.

As such, Dudley Council's Planning Policy Team is taking forward undeliverable proposals through its emerging Local Plan Review. The Local Plan Review (October 2024) therefore fails the "deliverability" test set out under paragraph 35 (indent c) of the Revised NPPF (2023), and deliverability tests set out in paragraph 16 (indent b) of the Revised NPPF (2023)

The Council's Planning Policy Team is not promoting the most environmentally sustainable patterns of new development within borough, and the approach being taken by the council on these matters is therefore in direct conflict with a range of sustainable development focused guidance as reinforced within paragraphs 7, 8, 10, 11, 16 (indent a), 35 (indent d), 38, and 157 - 159 of the Revised NPPF (December 2023).

We object to the continued poor quality of the evidence base being used by the Local Planning Authority to support Local Plan preparation – particularly with regards to green infrastructure, nature conservation, and climate change resilience matters. We have concerns that the emerging Local Plan Review is essentially being supported by a huge mountain of heavily out-of-date, not fit-for-purpose and insufficiently robust supporting background technical evidence, and does not therefore conform with the planning policy approach expected by paragraphs 16 (indents a and b), 31 and 35 of the Revised NPPF (2023).



Summary of key issues covered in this Local Plan Representation

1. On behalf of our clients, Goldfinch Town Planning Services has been instructed to submit strong objections to proposed major new housing site allocation reference number DLP H004. Site name: Caledonia sewage works. Referred to on page 209 of the Dudley Local Plan Regulation 19 – Part Two.
2. In order for our clients to remove their objections, Dudley Council's Planning Policy Team would need to fully remove the above proposed major new housing site allocation (housing site ref: DLP H004) from the council's emerging Local Plan Review (October 2024), and provide this critically important and sensitive natural green space area with appropriate and suitably robust natural green space planning policy protection. Via a suitably robust and fit-for-purpose designation on the main Policies Map of the Council's emerging Local Plan Review.
3. Our client recognises that there needs to be some new housing development within the borough to meet local community needs within the wider Dudley Metropolitan Borough. However, my clients maintain their view that the emerging Local Plan Review should be seeking to deliver a 'brownfield' (previously developed land) first approach, by focusing new housing development towards more sustainably-located urban brownfield sites, and making use of vacant and derelict floorspace on upper floors above existing shops and commercial premises within the borough's existing centres. The council's Planning Policy Team should not be directing new housing development proposals towards highly sensitive urban green space areas and urban woodlands, which form critically important wildlife habitats and which provide important climate change resilience features.
4. There is absolutely no point in Dudley Council declaring a climate change and ecological emergency and taking forward a climate change action plan, if the council's planning policy team has absolutely no intention whatsoever of ever promoting sustainable patterns of new development within its own emerging Local Plan Reviews (Development Plan Reviews).
5. The position is perfectly clear, in its current format, given that the Caledonia sensitive urban green space site (housing site reference: DLP H004) is being proposed for major new build housing development within Dudley Council's emerging Local Plan Review, the council's emerging Local Plan Review (Regulation 19 public consultation report – October 2024) is currently not promoting the most environmentally sustainable patterns of new housing development. As such, we maintain our view that Dudley Council's emerging Local Plan Review (2024) is therefore failing the 'Sustainability' tests of Soundness as specified within paragraph 35 (indent d) of the Revised National Planning Policy Framework (NPPF) (December 2023). We consider that the Local Planning Authority (LPA) is therefore taking forward an insufficiently robust, not fit-for-purpose and unsound Local Plan Review forward to the forthcoming Examination in Public (EIP) stage. Given the emerging Plan's

continued ongoing failure to promote the most environmentally sustainable patterns of new development.

6. Paragraph 35 (indent d) of the Revised NPPF (2023) is perfectly clear that: "...Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: (indent d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework..."
7. The proposed urban cramming approach of re-developing large areas of sensitive urban green space and urban woodlands for thousands of new homes within the borough is promoting inappropriate, damaging and unsustainable patterns of new development within the local area. The position is clear, Dudley Council's emerging Local Plan Review is delivering huge levels of environmental damage within heavily urbanised parts (which contain sensitive urban green space areas and critically important wildlife corridors) of the Dudley Metropolitan Borough, contrary to the Sustainability test discussed above (para 35 – indent d of the Revised NPPF). The LPA is causing huge levels of environmental vandalism and damage on an "industrial-scale" across large parts of the borough, contrary to the Sustainability test as discussed above.
8. The Caledonia former sewage works site already has planning consent for major new housing development. These planning consents date back a number of years. However, the character of the site has now substantially materially changed since these earlier and heavily out-of-date planning approvals, given that the site has become more sensitive as a wildlife habitat. These previous planning approvals also failed to sufficiently consider, remain sensitive to, accommodate, and take into account the importance of the site for providing critically important climate change resilience features. Most notably, its important role in helping to promote urban cooling (reduce the harmful effects of the Black Country Urban Heat Island Effect during hotter summer months), its role for improving poor urban air quality, the role of trees within the proposal site for providing carbon storage sink features, the sites role in providing flood storage mitigation measures/ flood storm water storage capacity.
9. Both Goldfinch Town Planning Services and our clients note that this parcel of land at Caledonia (former sewage works) has previously been allocated for major new build housing development in a number of previous successive Dudley Borough Local Plan Reviews. The site shown in the below photographs also has planning consent for major new housing. The Caledonia former sewage works site has consistently failed to come forward over an extensive timeframe - over the last 23 years, despite being allocated for new housing development in a range of various previous Dudley Borough Local Plan Reviews. Most notably, the site in question was previously allocated for new housing development in Dudley Council's adopted Unitary Development Plan (UDP) (2001), adopted Black Country Core Strategy (BCCS) (2011), and the adopted Dudley Borough Development Strategy (DBDS) (2017). Goldfinch Town Planning Services and our clients have increasing planning policy concerns that Dudley Council's Planning Policy Team is taking forward

- completely undeliverable housing site allocations within its latest emerging Local Plan Review (October 2024). In direct conflict with and contrary to “deliverability focused” guidance reinforced within paragraphs 16 (indent b) and 35 (indent c) of the Revised NPPF (December 2023).
10. The tests of soundness for Local Plan preparation are set out within paragraph 35 of the Revised NPPF (December 2023). Paragraph 35 (indent c) of the Revised NPPF (2023) could not be any more clear in its view that: “...Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are: (indent c) Effective – deliverable over the plan period...”
 11. The emerging Plan is taking forward completely undeliverable housing site allocations. As such, the Plan fails soundness tests set out in paragraph 35 (indent c) of the Revised NPPF (2023). The plan-making approach being taken forward by the LPA is insufficiently robust, not planning policy compliant, and vulnerable to later challenge from both private sector planning consultants as well as environmental groups.
 12. We object to the continued poor quality of the background supporting technical evidence base being used by Dudley Council’s Planning Policy Team to support Local Plan preparation. Particularly with regards to nature conservation, urban green space, climate change, urban air quality and green infrastructure/ wildlife corridor focused technical evidence base matters. We are alarmed that the council’s planning policy team is proposing a major new housing site allocation within a critically important strategic wildlife corridor and within a substantial urban green space area, which provides important climate change resilience features as well as sensitive wildlife habitats. Having assessed the evidence, Goldfinch Town Planning Services continues to maintain its view that the green infrastructure focused background technical evidence base being used to support Local Plan preparation, and the Local Plans accompanying Sustainability Appraisal (SA) report are both all clearly unsound, not sufficiently robust or fit-for-purpose, and therefore fail to satisfy test requirements specified under paragraphs 31, 35 (indent b) and 185 of the Revised NPPF (2023). It is important that we highlight these issues and concerns for the council in order to help the council take forward a sufficiently robust and legally compliant Local Plan Review to the later Examination in Public (EIP) stage,
 13. Paragraph 31 of the Revised NPPF (2023) confirms that: “...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence...” Paragraph 35 (indent b) of the Revised NPPF (2023) is perfectly clear that: “...Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are: (indent b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence).
 14. Paragraph 185 of the Revised NPPF (2023) attaches considerable planning policy importance to protecting strategically important wildlife corridors. It states

that: "...To protect and enhance biodiversity and geodiversity, plans should: (indent a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and (indent b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity..."

15. The Caledonia urban green space site provides a critically important wildlife corridor (of strategic/ landscape-scale importance – extending across a considerable part of the urban area) connecting wildlife habitats across the wider Black Country sub-region. Dudley Council's planning policy team is causing huge levels of environmental damage within the local area by allocating the Caledonia former sewage works site for major new housing development. The Planning Policy approach being taken on this issue is in direct conflict with paragraph 185 of the Revised NPPF referred to above, as well as existing adopted Black Country Core Strategy (BCCS) (2011) policies CSP3 (Environmental Infrastructure) and ENV1 (Nature Conservation). The councils position on these matters is no longer defensible.
16. The proposed re-development of the Caledonia urban green space site and wildlife corridor for a major new housing development proposal would be visually intrusive and detract from the area's special character, appearance, and local distinctiveness - considerably harming the residential amenity of long established, overlooking residential occupiers. Including our clients house which directly overlooks this important natural green space area. The proposals would therefore conflict with adopted Black Country Core Strategy (BCCS) (adopted February 2011) Policy ENV2 'Historic Character and Local Distinctiveness'.
17. Goldfinch Town Planning Services and our clients have major concerns about the highway safety impacts of this proposed major new build housing site allocation at Caledonia. Vehicles travel at considerable speeds along the Caledonia highway network and there are blind spots along the highway network near to the main site entrance of the proposed new housing site allocation. Developing this site for a major new housing development proposal will result in traffic collisions. This site allocation should not be supported on highway safety grounds.
18. Based on 3 cars per household, the proposed new housing site allocation involving 140 residential units would generate an additional 420 cars on the already pressured, heavily constrained and unsafe highway network (Caledonia highway network). The council's planning policy team has not thoroughly investigated these issues when allocating this site for new housing. Again, all these transport technical evidence base failings can be traced and stem all the way back to the 2011 Black Country Plan Review (BCCS Review). There has still been no improvement with regards to the highways/ transport

evidence approach taken towards these matters. On behalf of our clients, we respectfully request that this housing site allocation is now removed from Dudley Council's emerging Local Plan Review (2024).

19. For far too many years the Black Country Council's Planning Policy Teams have consistently failed to get a grip of the problem of appropriately dealing with the problem of severe traffic congestion when preparing emerging Local Plan Reviews. As stated above, all these problems and extensive planning policy failures stem all the way back to the adopted Black Country Core Strategy (BCCS) (2011).
20. We have concerns that Dudley Council's Planning Policy Team is promoting inappropriate, damaging, unsustainable, irresponsible and unsafe patterns of development within the borough. Please can officers leave their office/ home offices and visit the main site entrance onto the Caledonia highway network, and assess the position on site. Promoting this site for 140 new build residential units is incredibly dangerous and will result in major highway safety issues.
21. The local area cannot continue to accommodate increasingly unsustainable levels of new development. Existing road networks are already at maximum capacity levels and cannot cope with a significant increase in additional levels of new traffic, which would be generated by this proposed major new housing site allocation.
22. The number of proposed new build residential dwellings being proposed for this proposed major new housing site allocation is far too high, far too excessive and will result in an over-development of the proposal site. The proposals to re-develop this site for major new housing development will deliver environmental vandalism on an "industrial scale" within the local area. The proposed new housing site allocation should be removed from the council's emerging Local Plan Review, as this proposed new housing site allocation is not promoting sustainable patterns of development, contrary to the Sustainability test set out in paragraph 35 (indent d) of the Revised NPPF (December 2023)
23. The proposals represent an over-development of the proposal site which would result in very cramped and poor-quality living conditions for the future residential occupiers.
24. These heavily urbanised, high density, very low-quality forms of new residential development (resulting in severe urban cramming pressures) are failing to improve the environmental conditions and quality of the local area, in a part of the urban area which is already suffering from very poor urban air quality, and the worsening effects of the Black Country Urban Heat Island Effect during periods of high temperatures during the summer months. These weather conditions are increasing in severity and frequency in the Black Country sub-region, due to the impacts of climate change and the increasingly heavily urbanised character of the Black Country sub-region. Due to the continual incremental development encroachment pressures affecting existing urban green space areas and urban woodlands.
25. Given its heavily urbanised character and high-density form of development, this proposed major new housing site allocation fails to respond effectively to climate change focused guidance set out in paragraph 158 of the Revised

NPPF (December 2023), which confirms that: "...Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts..."

26. By allocating this sensitive natural green space site for major new housing, Dudley Council's Planning Policy Team appears to be missing its environmental protection and performance targets by a "significant and unexplained margin".
27. Natural green space shortage locally: There is an increasing shortage of these types (local natural green space areas/ key wildlife corridor sites) of natural green space sites within the wider local area, due to considerable built development encroachment pressures affecting other green space areas. This is starting to create an increasing shortage of these types of local natural green space sites. They should therefore be given appropriate natural green space planning policy protection within Dudley Council's emerging Local Plan Review.
28. The council has not even got an up-to-date or sufficiently robust Green Infrastructure (GI) background technical evidence base document in place to support the emerging Local Plan Review preparation. This is an alarming situation given that strategically important landscape-scale green infrastructure networks are being proposed for major new housing development.
29. We continue to maintain our view that the part of the Dudley Metropolitan Borough within the wider vicinity of the Caledonia site is being over-loaded with inappropriate, increasingly unsustainable, and environmentally damaging forms/ patterns of new development. Which are all substantially eroding the environmental quality of the local area, it's local distinctiveness and character, as well as damaging the health of thousands of local residents. By exposing them to increased risks of lung disease through increased traffic levels, and the continual removal of urban woodlands which help to reduce urban air pollution levels, and therefore play a critically important public health role.
30. The proposals to re-develop the Caledonia sensitive urban green space site and urban woodland for major new housing development conflict with a wide range of health focused central government (London) town planning guidance, as reinforced within paragraphs 8 (indent b and c), 96 (indent c), 102, 135 (indent f), 180 (indent e – air quality focused) of the Revised NPPF (December 2023). Dudley Council's Planning Policy and Development Management (DM) Teams have a legal duty, obligation and responsibility to consider this NPPF guidance as well as Human Rights Act Legislation (Articles 1 and 2 of the Human Rights Act) when making decisions on formal planning applications, and when shaping policies coming forward within emerging Local Plan Reviews. The Council also has a Legal obligation to support and protect biodiversity by protecting critically important wildlife habitats when bringing forward Local Plan Reviews. As stated further above, in its current format, the council's emerging Local Plan Review is failing to promote the most environmentally sustainable patterns of new development, and therefore fails the Sustainability tests of Soundness as set out in paragraph 35 (indent d) of the Revised NPPF (December 2023). The emerging Local Plan Review is not suitably robust or fit-for-purpose.

31. Dudley Council's Development Management and Planning Policy Teams "Need to get the balance right" in relation to how the LPA responds to the critical climate change emergency within the Dudley Metropolitan Borough. This is relevant given that the Met Office reported during early January 2024 that the UK experienced its second warmest year on record during the year 2023. These global records are bringing the world closer to breaching key international climate targets.
32. Given the severe adverse air quality health impacts on nearby heavily populated residential areas, the proposals to re-develop this sensitive urban green space area (which contains areas of semi-mature broadleaved woodland) will strongly conflict with guidance reinforced within paragraph 180 (indent e) of the Revised NPPF (2023) which confirms that: "...Planning policies and decisions should contribute to and enhance the natural and local environment by (indent e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality..."
33. The proposals fail to respond effectively to the environmental sensitivity of the proposal site location, located within one of the most already heavily polluted parts of the Dudley Metropolitan Borough, suffering from continued very poor urban air quality. The proposals to bring forward this major new housing site allocation are therefore in direct conflict with air quality focused guidance set out within paragraph 180 (indent e) of the Revised NPPF (2023).
34. The proposed major new housing site allocation at Caledonia would cause significant levels of light pollution during dark evenings, which would prove harmful to local wildlife using this strategic wildlife corridor. The proposals would therefore conflict with paragraph 191 (indent c) of the Revised NPPF (2023).
35. At dusk during the summer months, bats have been regularly observed by local residents using this important wildlife corridor as a foraging habitat. The proposals to bring forward this sensitive natural green space area as a major new housing site allocation will therefore harm, erode and substantially damage local biodiversity (have a damaging impact on protected wildlife species) and green infrastructure resources, in direct conflict with paragraphs 8 (indent c), 180 (indents a and d) and 185 of the Revised NPPF (2023). The proposals will also strongly conflict with existing adopted Black Country Core Strategy (BCCS) (adopted 2011) policies CSP3 (Environmental Infrastructure) and ENV1 (Nature Conservation), and Dudley Council's existing adopted Nature Conservation Supplementary Planning Document (SPD).

APPENDIX 1 – Site Photographs

All site photographs within this document were taken by Goldfinch Town Planning Services (West Midlands) on the 11th November 2024. This Local Plan consultation response is therefore based on a platform of sufficiently robust, defensible and up-to-date evidence, consistent with guidance reinforced within paragraph 31 of the Revised NPPF (December 2023), which confirms that: "...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence..."

Photograph 1

View of the Caledonia former sewage works site. Robust, up-to-date and defensible evidence provided within photographs 1 and 2 below demonstrates that this area provides an extensive wildlife corridor green infrastructure network which should remain protected in Dudley Council's emerging Local Plan Review. By re-developing this highly sensitive natural green space area for major new housing development, Dudley Council's emerging Local Plan Review (2024) is failing to promote the most environmentally sustainable patterns of new development, in direct conflict with and contrary to the 'Sustainability' test of Soundness as set out within paragraph 35 (indent d) of the Revised NPPF (December 2023).



Photograph 2

Showing the extensive green infrastructure network provided by the Caledonia former sewage works site. The site also provides critically important climate change resilience features. Including promoting urban cooling (reducing the Black Country Urban Heat Island Effect), reducing surface water run-off and providing flood storm water storage capacity for the River Stour. The sites extensive tree cover provides an important carbon storage SINC helping to mitigate the impacts of climate change. These landscape-scale strategic green infrastructure (wildlife corridor) networks are afforded a strong level of planning policy protection in paragraph 185 of the Revised NPPF (2023), and at the local-level, by policy guidance set out in the existing adopted Black Country Core Strategy (BCCS) (adopted February 2011) policy CSP3 (Environmental Infrastructure).

Long distance view taken from our client's property. The proposals to deliver 140 new build residential units across this sensitive urban green space landscape will cause substantial material harm to our clients property, harming and damaging the residential amenity and outlook of our clients property, and the residential amenity of neighbouring residential occupiers



(Photographs copyright (2024) Goldfinch Town Planni

Photograph 3

View of main site entrance leading onto Caledonia highway network.





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Limitations

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Goldfinch Town Planning Services (West Midlands)

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Goldfinch Town Planning Services (West Midlands) specialise in the following types of work:

- Urban green space and nature conservation planning policy specialists.
- All types of Local Plan Representations.
- Fully qualified town planners.
- Precision based and thorough town planning advice.
- Local Plan Planning Policy specialists Objections to all types of planning applications on behalf of members of the public and community urban green space pressure groups.
- Auditing and monitoring the environmental performance and effectiveness of Local Planning Authority (LPA) Planning Policy and Development Management (DM) Teams on behalf of local communities, local businesses, environmental groups and other interested key stakeholders.
- Objections to Telecommunications masts and urban green space re-development planning applications on behalf of local communities.
- Number of years previous LPA Planning Policy Team experience previously spent working within the Black Country sub-region (West Midlands). Specialised in dealing with highly complex and very wide-ranging urban green space and nature conservation planning policy work.
- Giving local communities a voice on all town planning matters.
- Preparation of Planning Statement Reports to support Planning Applications.
- Preparation of Pre-Application Planning Statement Reports to support emerging pre application proposals.
- Drone aerial view photography to support planning application objections.
- Expert witness at Public Local Inquiries specialising in objecting to open space re-development proposals on behalf of individuals and community urban green space pressure groups.
- Tracking and monitoring service available for community green space pressure groups to monitor the progress of LPA emerging Local Plan Reviews and subsequent public consultation timescales, to assist in timely consultation responses at all Local Plan Regulation 18 and 19 public consultation stages.
- Preparation of Green Infrastructure Studies (GI Studies) for LPA's and the private sector.
- Preparation of Green Space Audits (Open Space Needs Assessments) for LPA's and the private sector.
- Wildlife corridor enhancement specialists within both rural farmland and urban settings.
- Bat habitat enhancement specialists.
- Manufacture, supply and installation of bat boxes to help support habitat restoration work within both urban areas and rural settings.
- Bat Emergence Surveys (dusk surveys) to support planning applications or objections to planning applications.
- Bat foraging activity and commuting route dusk surveys to support planning applications or objections to planning applications.