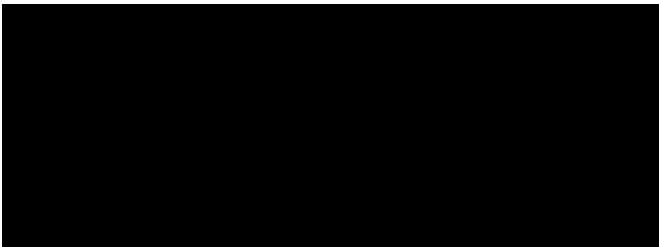




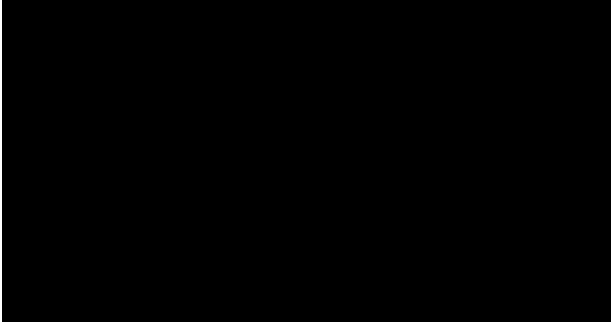
**REPRESENTATIONS TO
DUDLEY LOCAL PLAN
REGULATION 19 CONSULTATION**

**ON BEHALF OF CHARLES CHURCH
HOMES & THE DUDLEY GROUP
NHS FOUNDATION TRUST**

November 2024



QUALITY MANAGEMENT

Prepared and Authorised by:		
Date:		
Project Number/Doc Reference:		

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CONTENTS

1	INTRODUCTION	1
2	LAND AT CORBETT HOSPITAL	2
3	CONTEXT, VISION & SPATIAL STRATEGY	4
4	HEALTH & WELLBEING	9
5	HOUSING	11
6	THEMATIC POLICIES	14
7	SITE ALLOCATIONS.....	19
8	SUMMARY & CONCLUSIONS.....	21

APPENDICES

APPENDIX 1 – SITE LOCATION PLAN.....	I
APPENDIX 2 – HOUSING SITES REVIEW.....	II
APPENDIX 3 – REPRESENTATIONS FORMS	III

1 INTRODUCTION

1.1 Background

1.1.1 Claremont Planning is instructed by Charles Church Homes and the Dudley Group NHS Foundation Trust to submit representations to the current consultation on the Regulation 19 Draft of the emerging Dudley Local Plan (DLP). These representations relate to Land at Corbett Hospital, in respect of the potential residential development of the site. The site was formerly the subject of a planning application seeking permission for residential development under reference P22/1050. Despite the application's refusal, it is maintained by Charles Church Homes and the Dudley Group NHS Foundation Trust that the site remains suitable and available for residential development which could come forward in the future, and this should be acknowledged through the emerging DLP.

1.1.2 These representations build on the submissions made to the Regulation 18 consultation in 2023, as well as the Call for Sites submission in March 2023.

1.2 Structure of these Representations

1.2.1 The next section will provide an overview of the land being promoted at Corbett Hospital, and its context, demonstrating that the site is suitable and available to accommodate a sensitively designed and appropriate residential development.

1.2.2 The representations will then go on to review the Regulation 19 Publication Draft Local Plan. Firstly, in respect of the context, vision and spatial strategy, where concerns in respect of setting the housing requirement and how the Council expects this to be met will be established, as well as issues relating to the plan period and the Duty to Cooperate.

1.2.3 The representations will go on to consider the topics of health and wellbeing, then housing, with the latter including a more detailed review of some of the housing allocations presented at **Appendix 2**.

1.2.4 Section 6 provides a concise assessment of thematic policies, including in relation to the environment, green infrastructure, climate change amongst other topics, recommending changes where considered appropriate to respond to national policy and guidance.

1.2.5 Finally, Section 7 considers the site allocations presented in Part 2 of the Plan, focusing on the proposed Local Green Space designation DLP LGS1.

1.2.6 A copy of the completed representations form for the Local Planning Authority is provided at **Appendix 3**.

2 LAND AT CORBETT HOSPITAL

2.1 Site Context

- 2.1.1 Land at Corbett Hospital extends to approximately 5.9ha, and is located to the east of the Corbett Hospital Outpatient Centre, with existing residential development to the east and west of the site. To the north, is an area of allotments and Collis Street Play Area, whilst to the south is Vicarage Road and further residential development.
- 2.1.2 The site is located within Flood Zone 1, with no designated heritage assets located on or in close proximity to the site. The site is designated as a SINC (Site of Importance for Nature Conservation), which was confirmed in 2022 and there is an existing, area based Tree Preservation Order which encompasses the site and adjacent hospital site to the west.
- 2.1.3 Situated within the urban area, within close proximity to a network of walking and cycling infrastructure, the site's location delivers access to a wide range of employment destinations and facilities within suitable walking and cycling distances. The site also benefits from a frequent public transport service providing connections to destinations including Birmingham, Wolverhampton, Stourbridge and Dudley, with bus services up to every 10 minutes in close proximity to the site.
- 2.1.4 The site is currently in agricultural use, however it is in the ownership of Dudley Group NHS Foundation Trust. The NHS Trust identified the site on the Surplus Public Sector Land register in 2017, and in accordance with central government policy, is required to dispose of such assets ensuring that 'best value is obtained'. It is understood that the site has been excluded from this surplus land register update recently, however this was an administrative matter as the Trust were not actively pursuing disposal of the site when this update was prepared. Due to renewed discussions with Charles Church Homes, alongside these representations, it is understood that the site will be included again on the register when it is next updated. The site is therefore to be disposed of in accordance with public sector land disposal policy set by the Government on a national basis.

2.2 Site Suitability & Development Considerations

- 2.2.1 The land at Corbett Hospital should be recognised as a suitable location to accommodate residential development. It is situated within the Stourbridge urban area, in close proximity to a range of schools, workplaces, shops, and other facilities. As noted above, the site was identified by the NHS Trust as surplus to requirements in 2017, included on the register of Surplus Public Sector Land and accordingly the NHS Trust is obliged to seek 'best value' when disposing the site. The NHS Trust has confirmed that 100% of the net proceeds of the sale of the land will be spent within the Dudley local health economy and directly benefit local residents.
- 2.2.2 An application was submitted seeking full planning permission for residential development on the site, under application reference P22/1050. Despite repeated efforts to engage with the Planning Officers in order to address comments that had been received, the application was refused in January 2023. Notwithstanding this, it is considered that through careful design, development proposals be brought forward. These would appropriately respond to the site's nature conservation status, delivering enhancements to biodiversity, whilst ensuring that appropriate management is in place to ensure the future safeguarding of habitats on the site.

2.2.3

Despite the proposed allocation of the site as Local Green Space, which will be responded to later in these representations, the site currently does not have any public access, and designation as a Local Green Space will not alter this. The proposed designation of the site as Local Green Space is not considered appropriate or consistent with national policy and guidance in this regard. However, the development proposals devised by Charles Church Homes & the NHS Trust establish that more than half of the site would be dedicated to public open space and landscape areas, which would open up large areas of the site for recreational use for the benefit of both new and existing residents, connecting into local green corridors and recreational areas. This would deliver greater benefits for the local community than the site's formal designation as a Local Green Space.

3 CONTEXT, VISION & SPATIAL STRATEGY

3.1 Introduction to the Plan

What is a Local Plan and why are we doing a Review?

- 3.1.1 The publication of the Draft Plan comes at a changing time for planning policy on a national level, which is recognised to some extent in the Plan, including in the introduction. This includes reference to the 2020 Planning White Paper and subsequent reforms introduced by the 2023 Levelling Up and Regeneration Act. However, the Council fails to acknowledge through the draft Plan, the most recent Government proposals to change planning policy. Following the General Election in July 2024, the new Labour Government has made it clear that reforms to national planning policy will be implemented quickly, with a consultation on revisions to the National Planning Policy Framework undertaken during summer 2024. Whilst it is recognised that these changes remain in draft, and that there will likely be transitional arrangements allowing authorities that are at an advanced stage of plan-making to progress under the previous Framework guidance, the draft Plan should reference these latest reforms which pre-dated this current consultation.
- 3.1.2 In particular, the consultation on the changes to the Framework includes changes to how local authorities are required to calculate housing needs, as well as the requirement for the Green Belt to be reviewed as part of plan-making where an authority is unable to meet its identified housing, commercial or other needs. This will have significant implications for Dudley, as the proposed changes to the Government's standard method will increase the annual housing need figure to almost 1,600 dwellings, compared to 657 based on the current calculation.
- 3.1.3 Whilst the authority is likely able to avoid these requirements under the proposed transitional arrangements, it is considered that through this emerging Local Plan the Council should at least recognise the direction of travel of national policy and the future challenges for plan-making in the Borough. Furthermore, this context must be recognised in respect of the Council's decisions not to seek to meet the Borough's housing needs in full, through this emerging Plan. Whilst this will be critiqued in more detail in subsequent sections of these representations, it is evident from the emerging proposals for planning policy and calculating housing needs, that the Borough should be making all attempts to respond to this at the earliest opportunity, rather than delaying this for future plan-making.

Timetable

- 3.1.4 The draft Plan sets out the timetable for the main stages of the preparation of the Dudley Local Plan at Paragraph 1.20. This confirms that the preparation of the Plan is expected to be submitted to the Secretary of State in Spring/Summer 2025 for examination. The timetable goes on to estimate that the Plan will be under examination mid-late 2025, and then estimates adoption in 'early 2026'. It is presumably on this basis that the Council has set the end of the plan period as 2041.
- 3.1.5 It is considered that the Council's expectations with regarding the timetable for examination and adoption of the Plan are optimistic, and unrealistic. Guidance published by the Planning

Inspectorate¹ establishes that most examinations take around a year to a year and a half. This is on average, recognising that the examination of some plans won't take as long as this, whilst others will be much more protracted.

3.1.6 In order for these timescales to be met, it will be critical that the Council ensures that the Plan is fully robust, and as will be identified in subsequent sections of these representations, it is considered that this is not the case based on the Publication Draft. One matter of specific concern is the Council's approach to the Duty to Co-operate, as required by Section 33A of the Planning & Compulsory Purchase Act. Within the Procedural Guide for Local Plan Examinations², paragraph 3.5 identifies: *The duty to co-operate must be fulfilled when preparing the plan and any failure in this regard cannot be rectified after the plan has been submitted for examination.* It is evident from the Publication draft that there remains some uncertainty regarding where the Borough's unmet needs will be met, and will be evidenced, there is also significant uncertainty regarding how the emerging housing needs of neighbouring authorities will likely be met, which may mean that the Plan is unable to progress through the examination. Equally the Council's approach to housing allocations is not considered robust, which is likely to be challenged by the examining Inspector.

3.1.7 The timescales for the Plan's progression are therefore considered optimistic, and provide no buffer should the submission or examination of the Plan be delayed. Whilst the Government is committed to speeding up examination processes, it is considered likely that there will be requirements for the Council to provide additional evidence and/or for further consultations on information to be undertaken. On this basis, it is considered unlikely that the Plan will be able to be adopted by 'early 2026'. As such, the plan period for the emerging Plan should be reviewed prior to the submission of the Plan to ensure that should the Plan be delayed at examination, the plan period would still extend beyond the minimum requirement of 15 years post adoption, as required by Paragraph 22 of the Framework.

3.2 Context of the Local Plan

3.2.1 The shortcomings in respect of national policy context that have been identified above, persist in this section of the Plan. As it is expected that the national policy changes will be implemented by the Government ahead of the submission and examination of the Plan, it is reiterated that the Council should review the decision to ignore the proposed changes to national policy, and consider the implications of those changes for the Borough.

3.2.2 At a regional level however, it is also considered that the draft Plan fails to fully consider or address the ongoing challenges of plan-making across the wider Black Country area. The preparation of this Plan stemmed from the disbanding of the joint Black Country Plan, due to the inability of the four Black Country authorities to reach agreement on how the housing needs of the Black Country should be met. There remains significant uncertainty as to housing will be delivered at both a sub-regional and regional level, with a number of authorities identifying

¹ <https://www.gov.uk/guidance/taking-part-in-local-plan-examinations>

² <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>

substantial levels of housing needs that are unable to be met within the authority's own area. For example in the Preferred Options Plan published by Birmingham earlier in 2024, it was identified that the City expects to rely on other authorities to assist in delivery of c.45,000 dwellings to meet the emerging housing needs. Wolverhampton similarly published an Issues & Preferred Options consultation which identified unmet needs of almost 12,000 new homes. Sandwell meanwhile has recently concluded consultation on a Regulation 19 draft Plan, which identifies unmet needs of almost 16,000 dwellings.

3.2.3 Against these unmet housing needs, other authorities have identified the opportunity to assist in providing housing to assist neighbouring authorities. This includes Shropshire, South Staffordshire, Cannock and Telford, as identified in the Draft Plan, totalling approximately 4,290 dwellings. None of these authorities have adopted a Plan confirming these contributions, and therefore there remains uncertainty as to whether this can be relied upon. It is evident however that there are other authorities within the sub-region that have much greater needs for neighbouring authorities to assist in meeting than Dudley. Furthermore, it could be argued that Dudley should be playing a role in contributing to meeting those other unmet needs, given the administrative and functional relationships between the Borough and its neighbouring authorities due to housing market areas and commuting patterns. The Duty to Cooperate Statement 2024 establishes that the Council is writing to other authorities to inform them of the most up to date evidence and continued housing shortfall, however it is evident from the Statement that no formal negotiations or agreements have taken place.

3.2.4 It is also considered that the draft Plan has not adequately considered the needs of employment land in this regard. Whilst sites such as West Midlands Interchange will contribute towards the emerging land requirements, this is a large strategic site that is likely to be unsuitable for accommodating smaller scale or lower quality employment uses. These are the types of uses that are likely to require relocation in order to free up many of the housing allocations that the Council is reliant upon the delivery of to meet the housing needs. The authority should therefore revisit this and ensure that the expectations in terms of employment delivery are realistic and provide the appropriate quantum and quality of employment sites that will enable local businesses to continue to operate within the local area.

3.2.5 Accordingly, it is considered that the Plan as currently drafted has not adequately addressed the requirements of the Duty to Co-operate, and that this needs to be addressed prior to the Plan being submitted for examination, as noted in paragraph 3.1.6 above. The Framework establishes that effective and on-going joint working between strategic policy making authorities is integral to the production of a positively prepared and justified strategy, and therefore the Council must be able to demonstrate that it has fulfilled these obligations in order to demonstrate the Plan can be found sound.

3.3 Vision

3.3.1 The Plan identifies a proposed 'Vision' which contains seven aspirations for the future of the Borough. Whilst overall the aspirations are supported, the Council should acknowledge that it will be a challenge to balance meeting all of these aspirations, particularly where they are likely to conflict. For example, it will be challenging for the Borough to balance delivery of affordable and attractive places to live, with a green network, and a high quality and affordable transport network.

It is considered that the vision fails to recognise the need to provide a sufficient quantity of new homes to meet local needs, which should be a central target for the emerging Local Plan.

- 3.3.2 The key issue with the Vision however is considered to be the identification of a plan period to 2041. As noted in Paragraph 3.1.8 above, there is a significant risk that delays to the preparation or examination of the Plan will mean that the plan period falls short of the required 15 year plan period post adoption, as required by Paragraph 22 of the Framework. As such, the Council should plan for at least a further two years to allow for those delays and ensure that the Plan is capable of being found sound and consistent with the requirements of national policy, as required by Paragraph 35 of the Framework.

3.4 Spatial Strategy

Policy DLP1 – Development Strategy

- 3.4.1 The development strategy outlined in Policy DLP1 confirms the intention to deliver at least 10,470 new homes during the plan period to 2041, alongside at least 22.62ha of employment land. The policy goes on to confirm that the full housing and employment land requirements will be met through identified sites, and through reliance on neighbouring and other local authorities. It is considered that this is not an appropriate approach to plan-making by Dudley Council, in the current policy context and whilst other authorities in the local area are facing such significant housing shortfalls as identified above. It is maintained that the Borough should at least be planning to meet its emerging housing needs in full, and potentially also considering whether a meaningful contribution towards other authorities unmet housing needs could be delivered within the Borough as identified above.
- 3.4.2 The spatial strategy identifies the level of housing expected to be delivered at each of the identified centres, as well as in each of the proposed Regeneration Corridors. This confirms that the majority of the Borough's housing and employment needs will be delivered within those centres and corridors. Additionally, small and large site windfall allowances are proposed, as well as a windfall allowance from Dudley Council site disposals and an uplift allowance from centres. Together, this confirms how the Council expects to deliver c.10,470 new dwellings (net) and 22.62ha of employment land.
- 3.4.3 Whilst in principle this approach is supported, this fundamentally does not plan to deliver an appropriate level of growth required by the Borough. As noted at Paragraph 3.3.2, the Plan should be planning for a period to at least 2043, which would require an additional two years of housing requirements to be planned for. This is in addition to the shortfall of 699 dwellings already identified in the draft Plan, which the Council considers should be met by neighbouring authorities through the Duty to Co-operate. As a result, the Plan is not consistent with national policy, where Paragraph 23 of the Framework requires that "*strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.*" As such, in order to satisfy these requirements and be capable of being found sound at examination, the Council should revisit the fundamental approach of this Plan and ensure that sufficient sites are allocated to meet the emerging housing needs of at least a further two years, in full.

Policy DLP2 – Growth Network

- 3.4.4 In regards to Policy DLP2 – Growth Network, the approach identified through this policy maintains consistency from the adopted Development Plan, and continues to direct homes and other developments to the most sustainable locations in the Borough. In particular, the continued identification of the regeneration corridor between Brierley Hill and Stourbridge through RC2, The Draft Plan confirms that this represents a corridor that is extremely well connected to the rest of the region and hosts vibrant local centres. As such, high quality housing is to be focused within centres and along this corridor, with access to green infrastructure. This policy aspiration is welcomed and supported, recognising that within this identified corridor there is a range of services and facilities and good access to public transport, thereby representing highly sustainable location to direct further development towards.
- 3.4.5 It should however be recognised by the Council that there remain opportunities for further development to be allocated within these growth corridors, in particular within RC2 on land adjacent to the Corbett Hospital. This could provide an opportunity to deliver a high quality residential development within this growth corridor. In order to ensure that the Plan is sound, and that it is positively prepared and effective, it is considered that all opportunities for sustainable development within the regeneration corridors are utilised, including the allocation of this site for residential development.

4 HEALTH & WELLBEING

4.1 Introduction

- 4.1.1 The draft Plan continues from the previous draft to recognise within Chapter 7 the importance of health and wellbeing as a key objective of the Council, recognising that ensuring a healthy and safe environment that contributes to people's health and wellbeing is important for the Council and their partners in the health, voluntary and other related sectors.
- 4.1.2 The local NHS Foundation Trust plays a key role in supporting health and wellbeing in the Borough, however the draft Plan fails to recognise this.

4.2 Policy DLP8 Health and Wellbeing

- 4.2.1 The draft Policy DLP8 identifies that the Council will support developments that create an environment that promotes healthy communities, protects and improves the health and wellbeing of residents, and which reduces health inequalities. This is supported, recognising the importance of ensuring that new developments maximise opportunities to improve health and wellbeing. However, in this regard, it is considered that the Council should recognise the importance of securing indirect opportunities to enhance health infrastructure, such as through the realisation of development on land that the NHS currently owns, but has identified as surplus to requirements. The sale of the land to facilitate its redevelopment for housing, will provide significant capital receipts that will be directly invested into local health infrastructure, which is demonstrably required to address the health inequalities identified by the emerging Plan. This should be a strong material consideration which supports the allocation of the land for housing in the emerging Plan.
- 4.2.2 The requirement identified within Policy DLP8 to provide health impact assessments for all planning applications over 150 dwellings / 5ha in size is queried however, as it appears to represent an arbitrary threshold that hasn't been justified. If the Council is seeking health impact assessments for such developments, the policy and supporting text should clarify what the purpose of this is, and why it is considered appropriate, in order to ensure that the policies are justified and requirements set appropriately, in accordance with the tests of soundness set out in Paragraph 35 of the Framework.

4.3 Policy DLP9 – Healthcare Infrastructure

- 4.3.1 This policy establishes the importance of healthcare facilities, demonstrating that these will be protected. It is considered that the policy should, in addition to healthcare infrastructure and services, also extend to buildings and land, recognising that where these have been identified as surplus to requirements, policy should support opportunities for these to be delivered for non-healthcare uses. Facilitating this will enable the NHS to invest the capital receipts to deliver improvements to other healthcare infrastructure and facilities, providing benefits compared to retention of surplus land or buildings that are not suitable or required for healthcare purposes. As part of this, it is contended that the land at Corbetts Hospital that is being promoted through these representations, is an example of a site that has been declared publicly as surplus to requirements for healthcare and should be identified as suitable for redevelopment for residential uses.

4.3.2

The policy also includes a proposed requirement for all proposals for major residential developments to be assessed against the capacity of existing healthcare facilities or services, going on to identify that where demand would have unacceptable impacts on capacity developers will be required to contribute to the provision or improvement of such services. It is not considered that this policy requirement as currently drafted is clear or justified, thereby conflicting with national policy requirements for policies in Local Plans. Already, through the planning application process both within Dudley and elsewhere, the NHS is typically a statutory consultee, able to identify where concerns regarding capacity are likely to be impacted by proposed developments. However, typically it is not necessary to address these capacity concerns through planning obligations or conditions, whereby there are other mechanisms. Court cases such as [2023] EWHC 1995 (Admin) have identified that funding for the NHS is set out annually, based on previous costs plus allowance for population growth, and unless a funding gap can be evidenced and linked to the additional impact on capacity that a new development will generate, it has been found that it would difficult to justify a contribution to health services, that would comply with legislation for planning obligations.

5 HOUSING

5.1 Policy DLP10 – Delivering Sustainable Housing Growth

- 5.1.1 In order to address the housing figures established through Table 5.1 and Policy DLP1 of the draft Plan, Policy DLP10 confirms that sufficient land will be provided to deliver at least 10,470 new homes over the plan period to 2041. Table 8.1 provides a summary of the key sources of housing supply, whilst the proposed housing allocations are detailed in Part 2 of the Draft Plan.
- 5.1.2 It is contended that the Council's starting point in respect of the housing requirement for this Plan to address is inappropriate, and does not meet the soundness tests set out in the Framework for Plan-making. 10,470 dwellings does not represent the Borough's housing needs in full for the proposed plan period, whilst as set out in earlier sections of these representations, the plan period itself is not considered adequate. In order for the Plan to fulfil the requirements of the soundness tests, set out in Paragraph 35 of the Framework and respond to the requirement to look ahead at least 15 years post-adoption, it is considered that at least a further two years of housing supply should be added to the Plan through the addition of further housing allocations, with the plan period extended to 2043. The authority should also be seeking to meet the Borough's housing needs in full, given the unresolved concerns identified already through these representations in relation to reliance on neighbouring authorities through the Duty to Co-operate.
- 5.1.3 In any case however, it is contended through these representations that the Council has pursued a flawed approach to allocating sites for housing in the emerging Plan. The Framework is quite clear in Paragraph 69 that planning policies should identify a supply of:
- a) specific, deliverable sites for five years following the intended date of adoption; and
 - b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 5.1.4 As the Council envisages that the Plan will be adopted in 'early 2026', it is evident that the supply of deliverable and developable sites should be expected to be delivered during that timeframe. However, in the draft Plan, the Council has identified c. 1,390 dwellings that are on sites that have already been constructed, or where development is underway and in most cases well-advanced. These sites are identified in the Housing Sites Review provided at **Appendix 2** of these representations. As a result, it is considered that these sites, whilst contributing to the Council's housing supply requirements in the short term, should not form part of the proposed allocations for the emerging Local Plan.
- 5.1.5 The Housing Sites Review provided at **Appendix 2** also provides a review of the sites proposed to be allocated where planning permission has been granted previously, but no development has been delivered; as well as sites that were previously allocated in the adopted Development Plan, but equally have failed to be brought forward for development. Whilst these sites could come forward through the emerging Local Plan, the Council must recognise that in order for these sites to be allocated in the emerging Plan and be relied upon as a source of delivery, robust evidence of the suitability and availability of these sites should be provided as part of the evidence base to confirm to the Inspector examining the Plan that these are appropriate sites to be allocated.

5.1.6 In recognition of the issues regarding delivery on former employment sites, which comprises much of the Council's proposed brownfield housing sites, Paragraph 8.6 of the draft Plan's supporting text confirms that due to multiple delivery constraints, delivery on allocations from occupied employment land has been discounted by 15% in the Plan. The text goes on to confirm that supply from sites with planning permission that has not yet been implemented has also been discounted, by 10%. However, from the review presented at **Appendix 2**, the delivery of both of these types of sites has been challenging in the context of the previous Plan, but continues to be pursued a significant source of supply for the emerging Plan.

5.1.7 It is contended that in light of these concerns, the Council should revisit both the level of housing required by the emerging Plan, but also the supply of sites that the Council is relying upon to deliver this requirement. This is critical if the Council is to evidence through the examination of the Plan that it has fully considered the emerging housing needs as required by national policy, and also the requirements of national policy to identify a supply of deliverable sites to meet this. It should also reconsider sites that have been presented as potential missed opportunities in respect of the Plan, including the Land at Corbetts Hospital, whereby the Council could have identified this as an additional housing allocation within one of the key regeneration corridors, and in a highly sustainable location in the urban area.

5.2 Policy DLP11 – Density

5.2.1 The Council's approach to density responds positively to the requirements of the Framework to make effective use of land. However, the minimum densities set out in criteria 3 of DLP11 is a concern, when taking into consideration other requirements for developments including mandatory Biodiversity Net Gain, SUDS, proposed requirements for tree planting, public open space and other infrastructure needs.

5.2.2 It is considered that if the Council has based the capacity of site allocations on achieving or exceeding these minimum densities, the proposed capacity of housing allocations should be taken with caution, noting that it may not be feasible or appropriate to seek to deliver these densities. Further to concerns regarding the number of dwellings proposed through this emerging Plan in any case, the council should ensure that a robust and realistic approach to housing numbers has been taken in this regard. This should also be a consideration in respect of other priorities for the emerging Plan, recognising the need to balance expectations in terms of design and green infrastructure, whilst also seeking to secure appropriate levels of housing density to seek to meet local housing needs and respond positively to national policy requiring effective use of land. It is considered that the Plan as currently drafted has not given enough consideration to the inter-related nature of these issues, and there is a conflict in policy that should be addressed before the Plan proceeds to examination.

5.3 Policy DLP12 – Affordable, Wheelchair Accessible and Self-Build Housing

5.3.1 This policy seeks to guide the delivery of affordable and accessible housing, however as currently drafted, the policy is contradictory and ambiguous. For example, in respect of affordable housing, criteria 4 of the proposed policy establishes that the tenure and type of affordable homes will be determined on a site by site basis; however criteria 5 identifies a proposed tenure split of affordable housing. It is considered that the former represents a more appropriate approach for policy, enabling delivery of affordable housing to respond to changing needs and evidence over the plan period, rather than rigidly applying a tenure split. This should be addressed through

modifications to the proposed policy prior to the submission and examination of the Plan to ensure that the policies are clear and unambiguous in accordance with Paragraph 16 of the Framework.

5.3.2 A requirement for proportions of M4(2) and M4(3) compliant housing is also identified in the Policy, which has not been robustly justified. The Planning Practice Guidance confirms that authorities can adopt policy to provide enhanced accessibility or adaptability through reference to M4(2) or M4(3) Building Regulations Requirements, by clearly stating what proportion of new dwellings should comply with the requirements. However, the PPG goes on to say that policies should take into account site specific factors such as vulnerability to flooding, site topography, or other circumstances that may make a site less suitable for such dwellings, where step-free access cannot be achieved or would not be viable. The PPG identifies however that authorities should only apply the optional standards 'where an identified need exists', noting that policies should be based on the evidence of need, viability, and a consideration of site specific factors. It is not considered that the 'flexibility' identified in the policy by the Council is sufficient to respond appropriately to these requirements and could prove an unnecessary and unreasonable burden on deliverability or viability, when other policy expectations are also likely to be considerable.

5.3.3 It is not considered that the Council has justified the proportion of M4(2) and M4(3) compliant housing required, with requirements considered significant and onerous, particularly in respect of for M4(3) compliant dwellings, when this is likely not justified. The Plan as currently drafted fails to recognise that other types of housing may be more appropriate to meet the needs for accessible and adaptable and wheelchair accessible housing, such as specialist housing developments for older people. Such developments will provide additional support that is likely necessary alongside the housing suitability requirements and should be considered more appropriate to meet those needs. It is considered that the Council should reconsider the requirements set out in Policy DLP12, ensuring that the policies are justified and positively prepared, in recognition of the requirements of soundness set out in Paragraph 35 of the Framework.

6 THEMATIC POLICIES

6.1 Environment

Policy DLP31 – Nature Conservation

6.1.1 The importance of protecting the Borough’s biodiversity and geodiversity is supported, however the approach set out through the proposed policies, and in particular Policy DLP31 is not considered robust or appropriate. This replicates the proposed policy in the previous plan, seeking to secure a high level of protection for regionally designated nature conservation sites such as Sites of Importance for Nature Conservation (SINC). As set out through representations submitted in December 2023 on behalf of the NHS Trust and Charles Church Homes, the policy is inconsistent with the requirements of national policy. Notably, Paragraph 186 of the Framework whilst relating to planning applications rather than policy making, is nonetheless relevant here, where it states that only where “*significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused*”. Policy DLP31 currently establishes that locally designated nature sites will be protected from proposals that would ‘negatively impact’ them. The policy then goes on to identify that ‘where exceptional, strategic benefits of a development outweigh the importance of a local conservation site, species, habitat or geological feature, damage must be minimised, and remaining impacts mitigated.

6.1.2 In the context of a Borough that is unable to address its emerging housing needs, it is considered that this approach conflicts with the requirements of national policy in seeking to provide unnecessary levels of protection to designated sites for nature conservation. This is evident through the consideration of previous proposals for the Land at Corbetts Hospital, through planning application P22/1050. Despite the site being in a highly sustainable location, the site’s status as a SINC was a significant consideration in the refusal of planning permission, despite opportunities through the development to safeguard and enhance the most significant biodiversity features on the site.

6.1.3 It is considered that this policy should be modified to reflect national policy requirements, and the opportunities that may be presented on sites such as the Land at Corbett Hospital, whereby sensitive development proposals could be brought forward without harming the integrity of the nature designation. It is considered that if the Council wish to impose more stringent policy requirements that go beyond the expectation of national policy, this should be fully justified.

Policy DLP32 Biodiversity Net Gain

6.1.4 This proposed policy duplicates existing national policy and legislative requirements. This policy should be reviewed by the Council in accordance with the requirements of Paragraph 16 of the Framework, which requires policies to serve a clear purpose and avoid duplication. It is considered that the policy is unnecessary, given the mandatory requirements set out in national legislation, and therefore the Council should delete this proposed policy.

Policy DLP33 – Trees, Woodlands, Ancient Woodland and Veteran Trees

- 6.1.5 This proposed policy seeks to establish a requirement for major development to provide a minimum of 20% canopy tree cover across the development site. Whilst these aspirations are positive and the principle of securing planting of new trees is supported, the policy fails to acknowledge the implications of delivering this requirement on the capacity, and resultant viability, of development sites. This is particularly critical given that much of the Borough's housing requirement is proposed to be met on brownfield sites within the existing urban area, and the failure within the Plan to identify sufficient sites to meet the housing need. Other considerations including mandatory biodiversity net gain should also be recognised, with competing requirements likely to impact the amount of development that can realistically be achieved on sites.
- 6.1.6 It is therefore considered that if the authority wants to continue to request this through policy, this should be identified as aspirational and to be delivered where feasible and deliverable. Given the constraints presented to housing delivery within Dudley, the Council should recognise the imperative to ensure that an effective use of land is made and that the delivery of sites is not unduly constrained by arbitrary policy requirements. This policy should also be streamlined, removing unnecessary items that are covered through existing national policy or legislation such as relating to ancient woodland or veteran trees. National policy set out in Paragraph 16 of the Framework requires policy to be clearly written and unambiguous, and serve a clear purpose, whilst some of the requirements set out in this policy as currently drafted would be better placed within supporting text or supplementary planning guidance, to ensure that the Plan is drafted in an appropriate way.

Policy DLP37 – Open Space and Recreation

- 6.1.7 The Borough's vision for urban renaissance and environmental transformation and in particular deliver opportunities for safe, attractive, functional, linked, and accessible green spaces for people to exercise, connect to nature and play sport in and enjoy is strongly supported by Charles Church and the NHS Trust, recognising the importance of this contributing towards health and wellbeing. However, it is considered that within the draft Policy, the Council are failing to recognise the importance of ensuring that not only are green spaces protected, but that the function of such spaces is also assured through the Plan. It is considered that the site at Corbett Hospital, promoted through these and previous representations, is an example of an opportunity for the Borough to secure public access to, and as a result improve the functionality of an existing 'green space'. Paragraph 102 of the Framework specifically references the importance of 'access to a network of high quality open spaces and opportunities for sport and physical activity' for health and wellbeing, whilst at present, the site does not make a full contribution in this regard given the lack of public access. The site is in private ownership, with no public access, and continues to be in agricultural use. Whilst it may be argued to play a role in terms of visual amenity, it is considered that it could play a greater contribution and role in the Borough's green network, should the site be opened up through development. This will be further explored in response to Policy DLP LGS1 in later sections of these representations, however it is considered that through this emerging Policy, the Council should focus on securing the most 'value' from open spaces in the Borough, whilst recognising that these must be balanced against other priorities including housing delivery as well as ensuring such spaces are accessible, as set out in national policy.

Policy DLP39 Design Quality

6.1.8 National policy establishes the importance of good design for achieving sustainable development. It is considered that the Council's proposed design policy however is not considered to be consistent with national policy, and is overly lengthy as currently drafted. The policy seeks to cover a range of topics and references a range of different forms of policy and guidance, resulting in a protracted policy. The policy would be more effective should the Council focus on what the key expectations are in respect of design locally, with supporting text referencing where appropriate other supplementary policy or guidance that the authority expect developers to take into account.

6.1.9 In particular, the requirement for proposals to be compliant with national space standards, should be justified, if the Council consider that the evidence has identified that this is necessary. Footnote 52 of the Framework confirms that policies can make use of nationally described space standards, where the need is justified, and it is not considered that the Council has done so through the draft Plan or accompanying evidence base. Whilst the supporting text references that it is not expected that this requirement would impact on development viability, it is not considered that the Plan provides adequate justification for this to form a policy requirement.

6.2 Climate Change

Policy DLP41 – Increasing Efficiency and Resilience; DLP43 – Managing Heat Risk; DLP47 – Renewable and Low Carbon Energy

6.2.1 These three policies in the emerging Plan set out various policy measures relating to sustainable design and construction in order to achieve the Council's aspiration of mitigating and adapting to climate change. As identified through previous representations, it is considered that the policies should be reviewed and amalgamated, in order to streamline policy requirements and reduce duplication, consistent with the requirements of Paragraph 16 of the Framework. It should be considered whether policy requirements could be identified in more simple terms, with more detailed policy suggestions identified through Supplementary Planning Documents, whilst also recognising the increased requirements for renewable energy and other sustainable technologies advanced through changes to Building Regulations.

6.3 Green Infrastructure

Policy DLP51 – The Borough's Green Infrastructure Network

6.3.1 The Borough's aspirations to connect and extend the Green Infrastructure network are supported, however it is considered that the policy goes beyond what is reasonable and justified in this regard. For example, the expectation that the network will have a minimum width of 15m, unless it can be demonstrated that is unachievable, is considered to represent an arbitrary requirement, without justifying why it is necessary or how this would contribute towards the objectives of the Plan and this policy in particular. It is considered that the requirement for the 15m width should be removed from the policy, or identified as an aspiration, rather than policy requirement.

6.3.2 The proposed role and function of the Green Network is also questioned, where it is considered that some of these conflict with others. For example, the role as a wildlife corridor, but also providing opportunities for recreation. It is also questioned whether all of these identified functions are appropriate within the urban area, such as in respect of the use as grazing land for horse or

other livestock, where this would be better located in the rural parts of the Borough, rather than within the heart of the urban area. The Council should recognise the need to balance consolidation of the green network through enhancing existing areas and expanding others, with the need to deliver other sustainable development objectives, including meeting the need for homes and employment land. In this context, it should be recognised that sites could contribute towards the creation of this green network whilst also deliver housing, such as in the case of the site at Corbetts Hospital. It is contended that this site provides opportunity to deliver enhancements to existing biodiversity features, as well as public open space for recreation, within the context of a sensitively designed housing development.

6.4 Historic Environment

Policy DLP55 Historic Character and Local Distinctiveness of Dudley

- 6.4.1 The proposed policy seeks to secure the protection of non-designated heritage assets, to the same level as designated assets, which could comprise a wide range of landscapes or townscapes in addition to buildings and structures, in a highly restrictive manner that is not consistent with the Framework. The Framework at Paragraph 203, in respect of non-designated assets, requires that a 'balanced judgement' be made, having regard to the scale of any harm or loss and the significance of the heritage asset. It is considered that the policy should be amended to reflect the level of protection afforded to non-designated heritage assets through the Framework.

Policy DLP59 and Policy DLP60 – Areas of High Historic Townscape Value and Historic Landscape Value

- 6.4.2 Similarly to Policy DLP55, these policies seek to protect non-designated heritage assets. The protection proposed would go over and above the level of protection afforded to such assets through the Framework. Furthermore, the policies as currently drafted are ambiguous as to how proposals are expected to respond to these designations, and how they will be assessed by the authority. Contribution to local character and distinctiveness are subjective matters, and it is a concern that this would be used by decision-makers to object to development proposals. In the context of unmet housing needs and significant environmental challenges and aspirations, it is considered that these policies represent an additional layer of policy that may challenge the delivery of development required to meet local needs. The Council must consider how these policies relate to national policy and guidance, and whether they are justified or necessary to remain in the emerging Plan, as these will likely be scrutinised in respect of consistency with national policy and other tests of soundness, through the plan examination process.

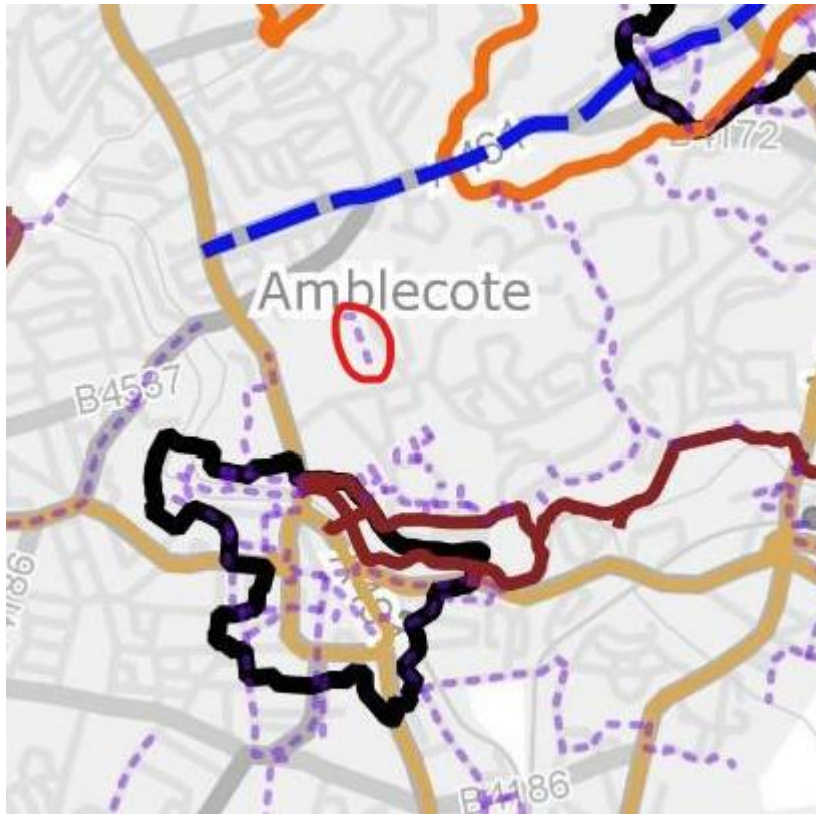
6.5 Transport

Figure 16.2 – Spatial Strategy Plan: Active Travel

- 6.5.1 This Plan identifies a network of travel routes, focusing on existing and proposed routes for active travel, and how this connects with the Metro route. It is queried why an emerging active travel route is identified across the land at Corbett Hospital, when it the land is currently in private ownership, with no public access, particularly whilst the land remains in agricultural use. This anomaly is circled in red in the extract provided overleaf.

6.5.2 However, through these representations it has been demonstrated that there is the potential for the site to be opened up through development proposals, which alongside a sensitive form of residential development, there would be the potential to deliver a new public open space and connect the site into surrounding existing public footpaths connecting to existing routes to the north and south in particular.

Figure 6.1 – Extract of Figure 16.2



7 SITE ALLOCATIONS

7.1 Policy DLPLGS1 – Corbett Meadow Local Green Space

- 7.1.1 The Dudley Group NHS Foundation Trust and Charles Church Homes strongly object to the proposed designation of Corbett Meadow Local Green Space through draft Policy DLPLGS1 of the emerging Local Plan. The Council previously sought to secure such a designation on the site through the Black Country Plan Review, prior to the decision to withdraw from the preparation of the joint Plan and instead proceed with the Dudley Local Plan Review instead. Representations were accordingly submitted on behalf of both parties strongly objecting to this proposal, as well as demonstrating why the proposed designation was not consistent with national policy.
- 7.1.2 It is maintained through these representations, and through the representations submitted to the Regulation 18 consultation in 2023, that the proposed designation of the site continues to be inconsistent with the requirements of national policy for such designations. The Framework identifies at Paragraph 105 that ‘Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services’. It is considered that the designation of Land at Corbett Hospital is not consistent with the requirement for the emerging Plan to contribute towards achieving sustainable development, and in particular delivering sufficient housing to meet objectively assessed needs. The site would provide an additional opportunity to allocate a small development site in the urban area, which would assist in meeting housing needs in the short term. The Council should reconsider the proposed designation and instead recognise the potential for the site to accommodate some housing delivery alongside public open space and biodiversity enhancements, such that it would provide a contribution towards achieving sustainable development in the Borough.
- 7.1.3 It is noted that the within the policy itself and the supporting text is consideration of the history of the site, including reference to grounds to be used for a public park. The Policy and supporting text however fail to acknowledge that since the land was originally gifted in the late 19th Century, the ownership of the land as part of a wider parcel transferred to the NHS on its formation in 1948, with part of the wider site continuing to be in medical use today. Other parts of the wider site were already disposed of by the NHS previously, which now forms the residential street John Corbett Drive. These details have been repeatedly confirmed to the Council through previous representations, despite which the Council has failed to acknowledge the full context of this site.
- 7.1.4 Notably, the NHS has no obligation to provide public access for recreation to any parts of the wider site, and instead the land proposed to be designated through this policy continues to be utilised for agriculture at the present time. This land has been identified by the NHS as not required for medical purposes and was therefore identified as surplus to requirements. It is understood that the site has been excluded from this surplus land register update recently, however this was an administrative point as the Trust were not actively pursuing disposal of the site. Due to renewed discussions with Charles Church Homes, alongside these representations, it is understood that the site will be included again on the register when it is next updated. The site is therefore to be disposed of in accordance with public sector land disposal policy set by the Government on a national basis, as referenced in the earlier representations to the Health and Wellbeing section of the Plan.

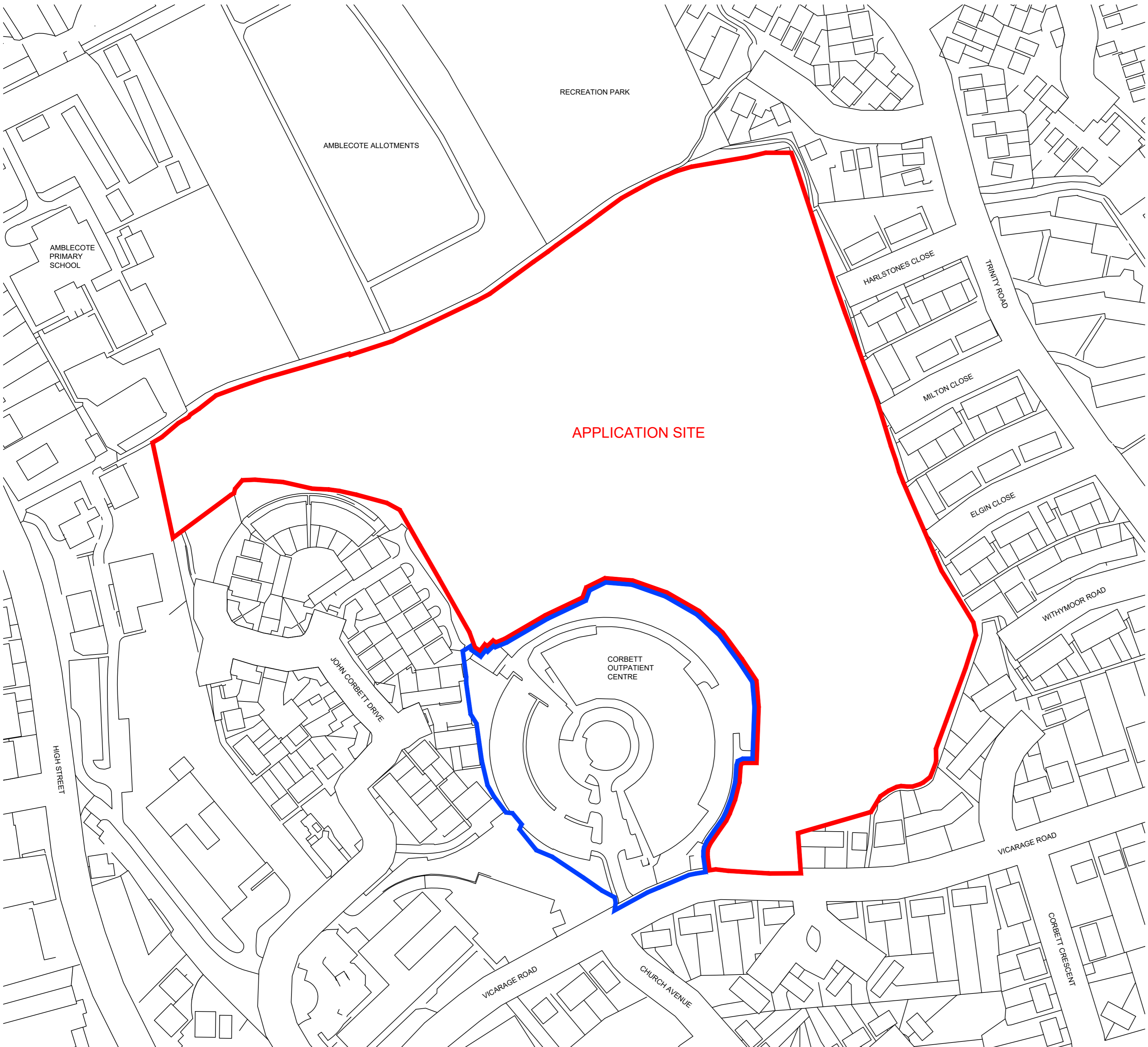
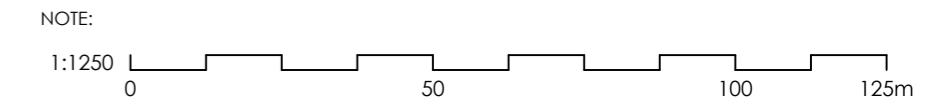
- 7.1.5 It is considered that the proposed designation as Local Green Space is sought to prevent development from taking place on the site, and the NHS from being able to receive 'best value', such that it is not consistent with national policy aims of achieving sustainable development. Importantly, there is no obligation on the NHS to provide public access to or use of the land proposed to be designated through this policy, and this should be reflected in the policy and supporting text, confirming that no public park is present on the site in order to ensure that it is consistent with the tests of soundness and justified, based on proportionate evidence.
- 7.1.6 It should be recognised that at present there is no public access to the site, and as noted above it is currently in agricultural use. Designation of the site as a Local Green Space would not impact this, or secure public access. The Planning Practice Guidance confirms that public access is not a prerequisite for designation of Local Green Spaces, however designation itself does not confer any rights of public access over what exists at present. Through the proposals for development on the site advanced through P22/1050 however, more than half of the site was to be dedicated to public open space and green infrastructure. This would have delivered a new public park and area of open space, securing public access to the majority of the site in perpetuity, to benefit both new and existing residents. This would have delivered strong environmental and social benefits, in a more effective way than the designation as Local Green Space is capable of achieving, thereby enhancing the quality of the open space.
- 7.1.7 The site is located within one of the identified Regeneration Corridors of the Borough, in a highly sustainable location within walking distance of a range of shops and services, including Stourbridge Town Centre. Despite the refusal of application P22/1050, it is maintained that the site presents an opportunity to deliver a sensitive form of residential development on part of the site, which would sit alongside open space, within a high quality green infrastructure framework. This would complement the locality, delivering much needed family housing including affordable dwellings, as well as securing public access and long-term maintenance of the site.
- 7.1.8 As such, it is considered that it would be highly inappropriate for the emerging Plan to continue to propose to allocate the Land at Corbett Hospital in the context of a significant shortfall in housing supply and the opportunity available to provide housing in a sustainable location within the urban area. Promoting residential development on the site would accord fully with the Spatial Strategy set out in the emerging Local Plan, which establishes that the intention is to deliver growth and sustainable patterns of growth by '*Delivering the majority of development in the existing urban area*'. It should therefore be preferable to seek to accommodate some of the identified level of housing need on suitable sites such as this, rather than seeking to restrict the potential for any development to come forward on the site, through the designation of a site for Local Green Space. This would ensure consistency with national policy, and contribute towards ensuring that a sound plan is achieved.

8 SUMMARY & CONCLUSIONS

- 8.1.1 These representations have been prepared by Claremont Planning on behalf of Charles Church Homes and the Dudley Group NHS Foundation Trust to the current consultation on the Regulation 19 Draft of the emerging Dudley Local Plan (DLP). These representations relate to, and continue to promote the Land at Corbett Hospital, in recognition of the potential residential development of the site.
- 8.1.2 As noted through these representations, the site was formerly the subject of a planning application seeking permission for residential development under reference P22/1050. Despite the application's refusal, it is maintained by Charles Church Homes and the Dudley Group NHS Foundation Trust and demonstrated through these representations that the site remains suitable and available for residential development which could come forward in the future, and this should be acknowledged through the emerging DLP.
- 8.1.3 These representations build on the submissions made to the Regulation 18 consultation in 2023, as well as the Call for Sites submission in March 2023.
- 8.1.4 These representations have identified concerns in respect of the Council's approach to plan-making, with the Council failing to fully acknowledge the implications of both the local and national policy context for the emerging Plan, or satisfy the Duty to Co-Operate. Critically, the Plan as currently drafted fails to plan for an appropriate plan period, or provide a strategy to meet the full housing need of the Borough. The housing allocations identified in the Plan are considered to be flawed, including sites that have already been delivered, or sites that have previously been allocated and have not been brought forward for development and are unlikely be delivered across the Plan Period. Furthermore, criticisms have been identified in respect of thematic policies, noting where these fail to acknowledge or otherwise conflict with the requirements of national policy.
- 8.1.5 The key criticism advanced by Charles Church Homes and The Dudley Group NHS Foundation Trust remains the proposed Local Green Space designation DLP LGS1. As established through these representations, it is maintained that the proposed designation of this site is contrary to national policy and should not be pursued through the Plan. Instead, there opportunity should be capitalised on for allocating Land at Corbett Hospital for residential development, which would positively contribute towards meeting the emerging housing needs, and provide opportunities for biodiversity enhancements and public open space. Failing to do so raises significant concerns about the Council's approach to spatial strategy and the soundness of the Plan.
- 8.1.6 It is hoped that these representations will be positively considered and result in modifications to the proposed strategy, prior to the Council advancing the preparation of this Plan.

APPENDIX 1 – SITE LOCATION PLAN

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REV	DATE	DESCRIPTION	REVISED BY	CHECKED BY	
		PROJECT NO P21-2135	SCALE 1:1250@A2	DATE 31.03.2022	STATUS PLANNING
		DRAWING NO P100	DRAWN BY CR	CHECKED BY CR	
		REVISION			

CLIENT
CHARLES CHURCH HOMES & THE DUDLEY GROUP NHS FOUNDATION TRUST
 PROJECT
AMBLECOTE GRANGE
STOURBRIDGE
 DRAWING TITLE
LOCATION PLAN

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APPENDIX 2 – HOUSING SITES REVIEW



Representations to Dudley Local Plan Regulation 19 Consultation – Housing Site Review

- 1.1. This note provides a desktop review of the housing sites proposed to be allocated in the emerging Dudley Local Plan. The Regulation 19 Draft of the Plan establishes through Policy DLP10 that the Plan will provide sufficient land to deliver at least 10,470 over the plan period, whilst Table 8.1 details the sources of supply and confirms the anticipated phasing over the duration of the proposed plan period from 2024-2041.
- 1.2. This review has focused on the sites identified in Part 2 of the draft Plan, specifically within Chapter 6 – Housing, which identifies 66 proposed housing allocations in Table 6.1, which does not include priority sites or other sites within the strategic centres, which are identified elsewhere in the draft Plan.
- 1.3. In undertaking this review, consideration has been given to the requirements of Paragraph 69 of the Framework, which requires planning policies to identifying a supply of:
 - a) *specific, deliverable sites for five years following the intended date of adoption; and*
 - b) *specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.*
- 1.4. This review firstly considers whether the sites that are proposed to be allocated have already been developed, or are under construction as of November 2024. It will then go on to consider other proposed allocations that benefit from planning permission, but do not yet appear to have commenced construction. Finally it will consider whether these and other sites proposed to be allocated in the emerging Plan, were previously allocated in the adopted Development Plan. It will then provide a short summary and conclusions regarding the implications of this review for the emerging Plan.



2. Sites Under Construction / Already Developed

- 2.1. The first category of sites that have been considered include sites that have already been constructed, and in some cases where developments are already understood to have been completed. Whilst it is recognised that the proposed plan period extends from 2024 to 2041, and therefore inclusion of sites that are already being delivered could be justified in principle, the issue with relying on these sites for the emerging plan period is that based on the available information, it is considered that by the time that the Plan is adopted in ‘early 2026’ as identified at Paragraph 1.20 of the draft Plan, development on these sites will be complete. As a result, it is not considered that the Council can demonstrate that these sites meet the definition of deliverable or developable sites, as they will be completed developments. There are a couple of exceptions to this, where development may continue once the plan has been adopted. for example at sites DLP H031 – Land at Birmingham New Road, where despite the site currently being under construction, the scale of development means that it may extend into the early years of the emerging plan period post-adoption Similarly, at Site DLP H048 – Sandvik Halesowen, where the first completions are envisaged imminently. However, it is maintained that the bulk of completions on these sites will be delivered prior to the adoption of the Plan, and therefore the sites should not form allocations in the emerging Plan.
- 2.2. Overall, Table 2.1 identifies a total of 14 sites, which cumulatively are expected to deliver 1,390 dwellings in the emerging Plan. It is considered that these dwellings should be removed from the housing trajectory, in recognition that these dwellings have already, or will shortly be delivered.

Table 2.1 – Sites Under Construction / Already Developed

DLP Site Reference	Site Name	Capacity	Allocated previously	Planning Application	Under Construction	Complete	Notes
DLP H001	Cookley Works, Leys Road, Brockmoor, Brierley Hill	70	Yes	P20/1189 - approved	Yes	Yes	Platform Housing website confirms all houses have been sold. https://www.platformhomeownership.com/development/cookley-works-brierley-hill
DLP H002	Land at Old Wharf Road, Stourbridge	256	Yes	P18/0921 - approved P21/0123 - approved	Yes	No	Site is largely constructed by Taylor Wimpey, with properties being marketed - https://www.taylorwimpey.co.uk/new-homes/stourbridge/titan-wharf . Expected completion during 2025
DLP H003	Long Lane/Malt Mill Lane, Shell Corner	13	Yes	P21/2189 - approved	Yes	Yes	Properties are currently being marketed - https://www.rightmove.co.uk/properties/154144118#/?channel=RES_NEW
DLP H018	Bull Street, Dudley	80	Yes	P20/0647 - Approved	Yes	Yes	Platform Home Ownership website confirms that all properties have been sold. https://www.platformhomeownership.com/development/bull-street-dudley



November 2024

CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H025	Land at Blowers Green Road, Dudley	63	Yes	P22/0403 - Approved	Yes	No	Site previously allocated in DBDS; application for 60 dwellings approved. Construction commenced but not yet completed as of July 2024. Properties available on Connells website: https://www.connells.co.uk/properties/19763014/sales/DUD313086
DLP H027	Former Factory Site, Park Lane, Cradley	80	Yes	P22/0871 - Approved	Yes	No	Site largely constructed, comprising 89 no dwellings. Bromford Homes website confirms all properties reserved: https://www.bromfordhomes.co.uk/homes/shared-ownership/park-lane
DLP H030	Former Ibstock Works	148	Yes	P20/0631 - Approved	Yes	Yes	Site constructed and occupied. Keepmoat website confirms majority of properties have been sold: https://www.keepmoat.com/stallings-place-kingswinford
DLP H031	Land at Birmingham New Road	472	Yes	P19/0611 - Approved	Yes	No	Site previously allocated in DBDS; application for 472 dwellings approved. Construction commenced but not yet completed as of July 2024. Properties available on Persimmon website: https://www.persimmonhomes.com/new-homes/central/coseley-new-village
DLP H044	Land adjacent to Pear Tree Lane, Coseley	34	Yes	P21/0912 - Approved	Yes	No	Site previously allocated in DBDS; application for 34 dwellings approved, construction commenced.
DLP H047	Baptist End Road, Netherton (Former Arley Court / Compton Court)	75	No	P21/2267 - Approved	Yes	No	Not previously allocated. Consent granted for 21 dwellings and 54 no. sheltered flats. Construction commenced.
DLP H048	Sandvik, Halesowen	60	No	P22/0695 - Approved	Yes	No	Not previously allocated. Consent granted for 61 dwellings. Construction commenced with first properties available for purchase - https://spitfirehomes.co.uk/find-your-home/maybank/
DLP H053	Land off Lower Valley Road	17	No	P21/1680 - Approved	Yes	Yes	Not previously allocated. Consent granted for 14 flats and 3 bungalows. Construction completed.
DLP H055	Vacant land at Darkhouse Lane	13	Yes	P20/1591 - Approved	Yes	No	Site previously allocated in DBDS; application for 9 dwellings and 4 flats approved, construction commenced.
DLP H056	Fiddlers Arms, 16 Straits Road	9	No	P22/0710 - Approved	Yes	No	Site not previously allocated; application for 9 dwellings approved, construction commenced.



3. Sites with Planning Permission

- 3.1. In addition to those sites that are already under construction or completed, the review also considered which proposed housing allocations already benefit from planning permission, but where construction is yet to commence. It also has included sites where planning applications are pending consideration.
- 3.2. This category includes a range of sites, with some examples of where recent planning permission has been granted and therefore construction is expected to commence shortly, such as in the case of DLP H017 or DLP H034. It is therefore considered reasonable that development on these sites will be delivered either before or during the early years of the emerging Plan period, and these sites should be allocated in the emerging Plan. There are also sites including DLP KQH1, DLP H004 and DLP H016 which are the subject of current applications that are pending consideration, where permission could be granted in the short term and development commence.
- 3.3. However, the other 7 sites (308 dwellings) that are within this category are sites where planning permission has previously been granted some time ago, or applications were not determined, and where no development appears to have been delivered. This is despite the majority of these sites previously having been identified and allocated for residential development in the previous Dudley Borough Development Strategy, which was based on a plan period extending to 2026 and therefore will lapse shortly. These planning permissions are now assumed to have lapsed. It is considered that the Council is relying on these sites coming forward for residential development to deliver housing required by the emerging Plan to deliver in the region of 300 dwellings, but without the assurance that these sites will be delivered. If these sites are to continue to be allocated for residential development in the emerging Local Plan, this should be justified through appropriate evidence that these sites are deliverable, and will be developed within the emerging Plan period. This is particularly critical where sites continue to be in alternative uses.

Table 3.1 – Sites with Planning Permission or Previous Applications

DLP Site Reference	Site Name	Capacity	Allocated previously	Planning Application	Notes
DLP H007	Bourne Street Coseley	72	Yes	P20/1306 - Approved	Site previously allocated in DBDS; application for 72 dwellings approved but no available evidence that site is under construction.
DLP H016	Land at corner of Saltwells Road and Halesowen Road, Netherton	63	Yes	P23/1352 - pending	Site previously allocated in DBDS; application for residential pending
DLP H017	Land off Thorns Road, Lye (North)	286	Yes	P22/1363 - Approved	Site previously allocated in DBDS; application for 50 dwellings recently approved in south of site but no construction commenced. Remainder of site occupied by continued employment uses.



CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H026	Land adj. to rear 84-86 Lyde Green, Halesowen	22	Yes	P13/1343 - Approved	Site previously allocated in DBDS; outline application for 24 residential unit approved in 2013. No application submitted since allocation.
DLP H028	Former MEB Headquarters, Mucklow Hill	60	Yes	P14/0612 - Approved	Site previously allocated in DBDS; outline application for 66 residential units approved in 2014. No application submitted since allocation.
DLP H034	Marriott Road	90	No - Employment	P24/0340 - Approved	Site previously allocated in DBDS; application for 90 dwellings approved in south of site but no construction commenced. Barratt Homes website confirms development will be coming forward soon https://www.barratthomes.co.uk/new-homes/dev-002592-anvil-place/?location=Dudley
DLP H041	Hampshire House, 434 High Street, Kingswinford	30	No	P21/2252 - Approved	Not previously allocated. Outline consent granted for 31 residential dwellings.
DLP H054	Former recycling site, Moor Street	80	Yes	P15/0175 - Approved	Site previously allocated in DBDS; outline application for 94 residential flats approved in 2017. No application submitted since allocation.
DLP H067	Orchard Works, Dudley	14	Yes	P20/1633 - Approved	Site previously allocated in DBDS; outline application for 14 residential flats approved in 2021. No reserved matters application submitted within 2 years and so permission has expired.
DLP KQH1	Ketley Quarry, Dudley Road Kingswinford	650	No	P22/1734 - pending	Not previously allocated; outline application pending.
DLP H004	Caledonia Sewage Works	140	Yes	P21/0734 - pending	Application for 132 - ie -8 compared to Council capacity estimates.
DLP H052	Derelict building opposite 206 to 218 Moor Street	30	Yes	P20/1705 - Disposed	P20/1705 - outline application for 45 dwellings disposed of. No further applications submitted.



4. Previous Allocations

- 4.1. Finally, this review has considered those sites that are proposed to be housing allocations in Table 6.1 of the draft Plan, but have previously been allocated for residential development in the adopted Development Plan, and have not been realised. As noted in paragraph 3.3 above, the adopted Development Plan for Dudley was adopted in 2017 and based on a plan period extending to 2026, and these sites were expected to be delivered during that plan period, in order to enable the Council to meet its housing requirements.
- 4.2. These 16 sites (645 dwellings) in Table 4.1 are examples of where sites have not come forward as previously anticipated, and yet despite this, the Council is continuing to rely on these allocations for the emerging Plan. As such, it is considered that the Council's approach to housing supply and the spatial strategy resulting from this is not sound, as it is not justified or effective, as required by Paragraph 35 of the Framework.

Table 4.1 – Previous Allocations

DLP Site Reference	Site Name	Capacity	Allocated previously	Allocation Reference	Notes
DLP H005	Clinic Drive Lye	71	Yes	H13.28	Site previously allocated in DBDS; no application for residential submitted.
DLP H006	Land off Ruiton St / Colwall Road Gornal	19	Yes	HO.10	Site previously allocated in DBDS; no application for residential submitted.
DLP H008	Land adj. To 49 Highfields Road	28	Yes	H16.11	Site previously allocated in DBDS; no application for residential submitted.
DLP H009	Springfield Works, Pearson Street, Lye	11	Yes	H13.21	Site previously allocated in DBDS; no application for residential submitted.
DLP H010	Land at Plant Street, Mill Street and Bridge Street, Wordsley	43	Yes	H11B.24	Site previously allocated in DBDS; no application for residential submitted.
DLP H011	Leys Road / Moor Street, Brierley Hill	85	Yes	H11B.18	Site previously allocated in DBDS; no application for residential submitted.



DLP H012	Quantum Works, Enville Street, Stourbridge	14	Yes	H11B.22	Site previously allocated in DBDS; no application for residential submitted.
DLP H014	Rufford Road, Stourbridge	16	Yes	H13.23	Site previously allocated in DBDS; no application for residential submitted.
DLP H015	Lyde Green	27	Yes	H13.12	Site previously allocated in DBDS; no application for residential submitted.
DLP H020	Shaw Road / New Road, Dudley	16	Yes	H11A.25	Site previously allocated in DBDS; no application for residential submitted.
DLP H021	The Straits / Majors Fold, Lower Gornal	23	Yes	HO.20	Site previously allocated in DBDS; no application for residential submitted.
DLP H032	Old Dock, Dudley	111	Yes	H11A.12	Site previously allocated in DBDS; no application for residential submitted.
DLP H033	North Street Industrial Estate	63	Yes	H11B.21	Site previously allocated in DBDS; no application for residential submitted.
DLP H035	Transport Yard, Old Wharf Road	36	Yes	H11B.16	Site previously allocated in DBDS; located adjacent to Titan Wharf development but located outside of that development.
DLP H045	St Peter's Road, Netherton	22	Yes	NETH.H8	Site previously allocated in DBDS; no application for residential submitted.
DLP H064	Coopers Bank Road, Gornal	60	Yes	HO.13	Site previously allocated in DBDS; no application for residential submitted.



5. Summary & Conclusions

- 5.1. This focused review has highlighted concerns with the approach taken by the Council in identifying housing allocations for the emerging Local Plan. The requirements of Paragraph 69 of the Framework to identify a supply of deliverable, and developable sites was emphasised in the introduction, and it is considered that the draft Plan currently fails to acknowledge this and respond robustly.
- 5.2. The sites reviewed in this note have identified a range of concerns with the Council's approach. For a number of sites, it is demonstrated that the development will already be completed, or substantially complete, either prior to or shortly after the adoption of the Plan. In such cases, the Council should not be reliant on the delivery of these sites to meet the housing needs of the emerging Plan, whereby the developments will instead be contributing to the housing needs of the previous Development Plan. As such, it is considered that at least 1,390 dwellings should be removed from the Plan's housing trajectory on the basis that these dwellings have already been delivered.
- 5.3. In other cases, it is evident that the Council has been anticipating that development on certain sites will be achieved for an extended period of time, illustrated through the allocation of sites in the former Development Plan. However, despite this, the sites have not come forward for development and it is questioned whether issues preventing development will persist into the emerging plan period, and whether those sites will not come forward as the allocations expect. Whilst it may be appropriate to retain these sites for the purposes of the emerging Plan examination, the deliverability of these sites should be scrutinised fully through the examination process in order to ensure that these allocations are robust.
- 5.4. Overall, it is demonstrated that the Council's approach to housing allocations in the emerging Plan is flawed and should be reconsidered prior to the submission of the Plan for examination. Failing to do so is likely to result in the submission of a Plan that does not allocate suitable and deliverable sites to meet emerging housing needs, and means that the Plan is unable to be found sound. The Council should recognise the importance of allocating a robust deliverable housing supply capable of meeting housing needs for the emerging Plan period, in order to facilitate the ongoing delivery of housing to meet local needs and ensure a compliant Development Plan.



Appendix 1 – Full Review of Housing Site Allocations



November 2024
CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP Site Ref	Prev Site Ref	Site Name	Capacity	Brownfield / Greenfield	Allocated previously - Reference	Planning Application	Under Construction	Complete	Notes
DLP KQH1	206	Ketley Quarry, Dudley Road Kingswinford	650	Brownfield	No	P22/1734 - pending	No	No	Not previously allocated; outline application pending.
DLP H001	19	Cookley Works, Leys Road, Brockmoor, Brierley Hill	70	Brownfield	Yes – H11B.1	P20/1189 - approved	Yes	Yes	Platform Housing website confirms all houses have been sold. https://www.platformhomeownership.com/development/cookley-works-brierley-hill
DLP H002	22	Land at Old Wharf Road, Stourbridge	256	Brownfield	Yes – H11B.16	P18/0921 - approved P21/0123 - approved	Yes	No	Site is largely constructed by Taylor Wimpey, with properties being marketed - https://www.taylorwimpey.co.uk/new-homes/stourbridge/titan-wharf . Expected completion during 2025
DLP H003	30	Long Lane/Malt Mill Lane, Shell Corner	13	Brownfield	Yes - H13.29	P21/2189 - approved	Yes	Yes	Properties are currently being marketed - https://www.rightmove.co.uk/properties/154144118#/?channel=RES_NEW
DLP H004	32	Caledonia Sewage Works	140	Brownfield	Yes - H13.5	P21/0734 - pending	No	No	Application for 132 - ie -8 compared to Council capacity estimates.
DLP H005	35	Clinic Drive Lye	71	Brownfield	Yes - H13.28	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H006	87	Land off Ruiton St / Colwall Road Gornal	19	Greenfield	Yes - HO.10	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H007	91	Bourne Street Coseley	72	Brownfield	Yes - HO.17	P20/1306 - Approved	No	No	Site previously allocated in DBDS; application for 72 dwellings approved but no available evidence that site is under construction.
DLP H008	101	Land adj. To 49 Highfields Road	28	Brownfield	Yes - H16.11	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H009	138	Springfield Works, Pearson Street, Lye	11	Brownfield	Yes - H13.21	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H010	149	Land at Plant Street, Mill Street and Bridge Street, Wordsley	43	Brownfield	Yes - H11B.24	No	No	No	Site previously allocated in DBDS; no application for residential submitted.



CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H011	151	Leys Road / Moor Street, Brierley Hill	85	Brownfield	Yes - H11B.18	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H012	155	Quantum Works, Enville Street, Stourbridge	14	Brownfield	Yes - H11B.22	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H014	158	Rufford Road, Stourbridge	16	Brownfield	Yes - H13.23	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H015	159	Lyde Green	27	Brownfield	Yes - H13.12	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H016	162	Land at corner of Saltwells Road and Halesowen Road, Netherton	63	Brownfield	Yes - NETH.H13	P23/1352 – pending	No	No	Site previously allocated in DBDS; application for residential development pending.
DLP H017	164	Land off Thorns Road, Lye (North)	286	Brownfield	Yes - H13.17	P22/1363 - Approved	No	No	Site previously allocated in DBDS; application for 50 dwellings recently approved in south of site but no construction commenced. Remainder of site occupied by continued employment uses.
DLP H018	181	Bull Street, Dudley	80	Brownfield	Yes - H11A19	P20/0647 - Approved	Yes	Yes	Platform Home Ownership website confirms that all properties have been sold. https://www.platformhomeownership.com/development/bull-street-dudley
DLP H019	189	St Marks House, Brook Street	13	Brownfield	No	No	No	No	Site not previously allocated; no application submitted.
DLP H020	190	Shaw Road / New Road, Dudley	16	Brownfield	Yes - H11A.25	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H021	200	The Straits / Majors Fold, Lower Gornal	23	Greenfield	Yes - HO.20	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H023	302	Industrial land at Marriott Road and Cradley Road	41	Brownfield	No - Employment - NETH.E1	No	No	No	Site previously allocated for employment in DBDS; no application for residential submitted.



CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H024	304	Hayes Lane, Stour Vale Road	58	Brownfield	No - Employment - E13.6	No	No	No	Site previously allocated for employment in DBDS; no application for residential submitted.
DLP H025	327	Land at Blowers Green Road, Dudley	63	Brownfield	Yes - H11A.17	P22/0403 - Approved	Yes	No	Site previously allocated in DBDS; application for 60 dwellings approved. Construction commenced but not yet completed as of July 2024. Properties available on Connells website: https://www.connells.co.uk/properties/19763014/sales/DU D313086
DLP H026	331	Land adj. to rear 84-86 Lyde Green, Halesowen	22	Brownfield	Yes - H13.12	P13/1343 - Approved	No	No	Site previously allocated in DBDS; outline application for 24 residential unit approved in 2013. No application submitted since allocation.
DLP H027	332	Former Factory Site, Park Lane, Cradley	80	Brownfield	Yes - H13.13	P22/0871 - Approved	Yes	No	Site largely constructed, comprising 89 no dwellings. Bromford Homes website confirms all properties reserved: https://www.bromfordhomes.co.uk/homes/shared-ownership/park-lane
DLP H028	336	Former MEB Headquarters, Mucklow Hill	60	Brownfield	Yes - H14.4	P14/0612 - Approved	No	No	Site previously allocated in DBDS; outline application for 66 residential units approved in 2014. No application submitted since allocation.
DLP H030	H10.4	Former Ibstock Works	148	Brownfield	Yes - H10.6	P20/0631 - Approved	Yes	Yes	Site constructed and occupied. Keepmoat website confirms majority of properties have been sold: https://www.keepmoat.com/stallings-place-kingswinford
DLP H031	H16.1	Land at Birmingham New Road	472	Brownfield	Yes - H16.1	P19/0611 - Approved	Yes	No	Site previously allocated in DBDS; application for 472 dwellings approved. Construction commenced but not yet completed as of July 2024. Properties available on Persimmon website: https://www.persimmonhomes.com/new-homes/central/coseley-new-village
DLP H032	399	Old Dock, Dudley	111	Brownfield	Yes - H11A.12	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H033	406 / H11B.21	North Street Industrial Estate	63	Brownfield	Yes - H11B.21	No	No	No	Site previously allocated in DBDS; no application for residential submitted.



CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H034	SA-0132-DUD	Marriott Road	90	Brownfield	No - Employment - NETH.E1	P24/0340 - Approved	No	No	Site previously allocated in DBDS; application for 90 dwellings approved in south of site but no construction commenced. Barratt Homes website confirms development will be coming forward soon https://www.barratthomes.co.uk/new-homes/dev-002592-anvil-place/?location=Dudley
DLP H035	402	Transport Yard, Old Wharf Road	36	Brownfield	Yes - H11B.16	No	No	No	Site previously allocated in DBDS; located adjacent to Titan Wharf development but located outside of that development.
DLP H036	403	Brockmoor Foundry North, Leys Road	80	Brownfield	No - Employment - E11B.6	No	No	No	Site previously allocated in DBDS for employment use; no application for residential submitted.
DLP H037	308	Land between Heath Road and Copse Road, Netherton	27	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H038	312	Land rear of Salcombe Grove, Coseley	38	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H039	321	Land rear of Two Gates Lane, Cradley	24	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H040	341	Land adjacent 32 Whitegates Road, Coseley	10	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H041	346	Hampshire House, 434 High Street, Kingswinford	30	Brownfield	No	P21/2252 - Approved	No	No	Not previously allocated. Outline consent granted for 31 residential dwellings.
DLP H042	358	Land rear of 294 to 364 Stourbridge Road, Halesowen	25	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H043	374	Land at Corporation Road and Cavell Road, Dudley	10	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H044	375	Land adjacent to Pear Tree Lane, Coseley	34	Greenfield / Brownfield	Yes - H16.9	P21/0912 - Approved	Yes	No	Site previously allocated in DBDS; application for 34 dwellings approved, construction commenced.



DLP H045	378	St Peter's Road, Netherton	22	Brownfield	Yes - NETH.H8	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H046	382	Former New Hawne Colliery, Hayseach Road, Halesowen	15	Brownfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H047	383	Baptist End Road, Netherton (Former Arley Court and Compton Court)	75	Brownfield	No	P21/2267 - Approved	Yes	No	Not previously allocated. Consent granted for 21 dwellings and 54 no. sheltered flats. Construction commenced.
DLP H048	360	Sandvik, Halesowen	60	Brownfield	No	P22/0695 - Approved	Yes	No	Not previously allocated. Consent granted for 61 dwellings. Construction commenced with first properties available for purchase - https://spitfirehomes.co.uk/find-your-home/maybank/
DLP H049	303 / SA-303	Site at Wellington Road and Dock Lane	130	Brownfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H050	400 / SA-373	National Works, Hall Street, Dudley (Nuttalls)	150	Brownfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H051	405	Land adjacent to Nuttalls	36	Brownfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H052	390	Derelict building opposite 206 to 218 Moor Street	30	Brownfield	Yes - H11B.17	P20/1705 - Disposed	No	No	P20/1705 - outline application for 45 dwellings disposed of. No further applications submitted.
DLP H053	395	Land off Lower Valley Road	17	Greenfield	No	P21/1680 - Approved	Yes	Yes	Not previously allocated. Consent granted for 14 flats and 3 bungalows. Construction completed.
DLP H054	398	Former recycling site, Moor Street	80	Brownfield	Yes - H11B.25	P15/0175 - Approved	No	No	Site previously allocated in DBDS; outline application for 94 residential flats approved in 2017. No application submitted since allocation.



CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H055	391	Vacant land at Darkhouse Lane	13	Brownfield	Yes - H16.2	P20/1591 - Approved	Yes	No	Site previously allocated in DBDS; application for 9 dwellings and 4 flats approved, construction commenced.
DLP H056	392	Fiddlers Arms, 16 Straits Road	9	Brownfield	No	P22/0710 - Approved	Yes	No	Site not previously allocated; application for 9 dwellings approved, construction commenced.
DLP H057	401	Pens Meadow School, Ridge Hill	30	Brownfield	No	No	No	No	School has yet to relocate so site is still in educational use.
DLP H058	410	Land at Norton Crescent, Coseley	12	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H059	409	Land at Highfields Road / Highmoor Close, Coseley	12	Greenfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H060	408	Holloway Street West, Gornal	24	Brownfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H061	411	Church Road, Netherton	29	Brownfield	No	No	No	No	Not previously allocated; no application submitted.
DLP H062	407	Saltwells Education Centre	50	Brownfield	No	No	No	No	Not previously allocated; no application submitted. Site currently occupied although has been marketed for sale during 2024, suggesting would be made available for redevelopment.
DLP H063	438	Moor Street, Brierley Hill	90	Brownfield	No - Employment - E11B.5	No	No	No	Site previously allocated for employment in DBDS; no application for residential submitted.
DLP H064	439	Coopers Bank Road, Gornal	60	Brownfield	Yes - HO.13	No	No	No	Site previously allocated in DBDS; no application for residential submitted.
DLP H065	441	Woodside Centre, Hallchurch Road, Dudley	18	Brownfield	No	No	No	No	Not previously allocated; no application submitted. According to available information, the site sold at auction in May 2024 and therefore expected to be available for redevelopment.
DLP H066	440	The Mere Education Centre, Lawnswood Road, Wordsley, Stourbridge	19	Brownfield	No	No	No	No	Not previously allocated; no application submitted. Site marketed for sale, unclear whether sold but appears available for redevelopment.



November 2024

CLR224 Representations to Dudley Local Plan Reg 19 Consultation – Housing Site Review

DLP H067	442	Orchard Works, Dudley	14	Brownfield	Yes - H11A.23	P20/1633 - Approved	No	No	Site previously allocated in DBDS; outline application for 14 residential flats approved in 2021. No reserved matters application submitted within 2 years and so permission has expired.
DLP H068	No ref	Land between Lower Valley Road and Hawbush Road, Brierley Hill	32	Brownfield	No	No	No	No	Not previously allocated; no application submitted.

APPENDIX 3 – REPRESENTATIONS FORMS

Representation form

Dudley Local Plan

Publication Plan

Consultation October 2024

DUDLEY LOCAL PLAN



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

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 be used to submit your response to the consultation.

For more information, please visit www.dudley.gov.uk/localplan or contact us 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		
First name		
Last Name		
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	
Planning Agent or Consultant	X
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.

For official use only

Respondent No:		Representation No:		Date received:	
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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: 

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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Respondent No:		Representation No:		Date received:	
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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 | <input checked="" 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.

Please see section 3.1 of the submitted representations report.

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.

As set out in the accompanying report in Section 3.1, the Council should review and amend the plan period to ensure that it plans for at least 15 years post-adoption, as required by the Framework.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, in particular in respect of the plan period.

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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Respondent No:		Representation No:		Date received:	
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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	Context of the Local Plan	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 | <input checked="" 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.

Please see section 3.2 of the submitted representations report.

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.

As set out in the accompanying report in Section 3.2, as there is no formal agreement from other authorities, the Council should amend the Plan to fully address its housing needs, or demonstrate otherwise that the Duty to Co-operate has been satisfied, and that it can rely on other authorities to deliver its unmet housing needs.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, in particular in respect of failure to satisfy the Duty to Co-Operate.

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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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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Respondent No:		Representation No:		Date received:	
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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 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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 3.3 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 3.3, in order to ensure compliance with national policy, the Council should extend the proposed plan period, to ensure it is at least 15 years post-adoption.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, in particular in respect of the proposed plan period.

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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Please enter **Dudley Local Plan Representation** in the subject field of the email.

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Respondent No:		Representation No:		Date received:	
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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	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 | <input checked="" 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.

Please see section 3.4.1 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 3.4.1, the Council should review the approach outlined in the spatial strategy in order to ensure that the Plan will fully address emerging housing needs.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, in particular in respect of the proposed spatial strategy and approach to meeting housing needs.

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.

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Respondent No:		Representation No:		Date received:	
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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	DLP2
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 3.4.4 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 3.4.4, the Council should reconsider the approach to allocating sites in Regeneration Corridors, including in particular the failure to allocate Land at Corbett Hospital for housing development, despite its location within Regeneration Corridor RC2. This is critical given the failings of the Plan to allocate enough sites for housing delivery, and thus to ensure that the Plan is positively prepared.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, in particular in respect of the proposed Regeneration Corridors and the failure to allocate sufficient sites for housing.

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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Respondent No:		Representation No:		Date received:	
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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	Health & Wellbeing	Policy	DLP8
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 4.2 of the submitted representations report.

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.

As set out in the accompanying report in Section 4.2, the Council should review the proposed policy and supporting text to justify the approach taken in respect of health.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, and the lack of consistency with national policy.

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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Respondent No:		Representation No:		Date received:	
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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	Health & Wellbeing	Policy	DLP9
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 | <input checked="" 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.

Please see section 4.3 of the submitted representations report.

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.

As set out in the accompanying report in Section 4.3, the Council should review the proposed policy and supporting text to justify the approach taken in respect of health.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach, and the lack of consistency with national policy and legislation for planning obligations.

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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Respondent No:		Representation No:		Date received:	
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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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 5.1.1 onwards of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 5.1, the Plan needs to be reviewed to ensure that the approach to site allocations is appropriate and robust, and critically that additional sites are proposed to be allocated, to ensure that the Borough is addressing the housing needs in full, without reliance on neighbouring authorities.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach to housing allocations, and the failure to allocate sufficient sites within the emerging Plan.

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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Completed representations forms can be submitted by emailing: planning.policy@dudley.gov.uk

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Respondent No:		Representation No:		Date received:	
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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	DLP11
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 | <input checked="" 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.

Please see section 5.2 of the submitted representations report.

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.

As set out in the accompanying report in Section 5.2, the Council should review the approach taken through this Policy, as well as the assumptions regarding the capacity of proposed site allocations.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach to housing density, as set out through this policy.

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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Respondent No:		Representation No:		Date received:	
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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	DLP12
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 | <input checked="" 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.

Please see section 5.3 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 5.3 the Council should review the approach taken through this Policy, as it is not consistent with national policy and guidance in respect of the requirements for policies to be clearly written and evidence based.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach to affordable and accessible housing requirements.

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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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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Respondent No:		Representation No:		Date received:	
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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	Environment	Policy	DLP31
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.1.1 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 6.1.1 the Council should review the approach taken through this Policy, as it is not consistent with national policy.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and provide clarity regarding our concerns about the Council's approach to nature conservation policy.

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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Respondent No:		Representation No:		Date received:	
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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	Environment	Policy	DLP32
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.1.4 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 6.1.4 the Council should delete this proposed policy, as it is already addressed by legislation and duplicates national policy requirements.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is unnecessary, and should not be included in the Plan.

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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Respondent No:		Representation No:		Date received:	
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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	Environment	Policy	DLP33
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.1.5 of the submitted representations report.

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.

As set out in the accompanying report in Section 6.1.5 the Council should review this proposed policy so that it is consistent with national policy, simplifying the wording to ensure that it is clear and unambiguous, and does not duplicate other policy requirements. The Council should also consider whether it would be more appropriate to include some of the requirements in supplementary planning guidance documents.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

***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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Please enter **Dudley Local Plan Representation** in the subject field of the email.

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Respondent No:		Representation No:		Date received:	
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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	Environment	Policy	DLP37
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.1.7 of the submitted representations report.

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.

As set out in the accompanying report in Section 6.1.7 the Council should review this proposed policy so that it is consistent with national policy.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

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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Respondent No:		Representation No:		Date received:	
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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	Environment	Policy	DLP39
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.1.8 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 6.1.9 the Council should review this proposed policy so that it is consistent with the requirements of national policy.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

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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For official use only

Respondent No:		Representation No:		Date received:	
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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	Climate Change	Policy	DLP41, DLP43, DLP47
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.2.1 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 6.2.1, the Council should delete these policies and instead bring forward these aspirations through supplementary planning policy documents and guidance.

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.

For official use only

Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

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.

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Please enter **Dudley Local Plan Representation** in the subject field of the email.

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Respondent No:		Representation No:		Date received:	
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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	Green Infrastructure	Policy	DLP51
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.3.1 of the submitted representations report.

Continue on a separate sheet if necessary.

For official use only

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.

As set out in the accompanying report in Section 6.3.1, the Council should review this proposed policy to better align with the requirements of national policy.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

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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Respondent No:		Representation No:		Date received:	
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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	Historic Environment	Policy	DLP55
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.4.1 of the submitted representations report.

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.

As set out in the accompanying report in Section 6.4.1, the Council should review this proposed policy to reflect the level of protection afforded to non-designated heritage assets as set out in the Framework at Paragraph 203.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

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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Respondent No:		Representation No:		Date received:	
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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	Historic Environment	Policy	DLP59 and DLP60
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.4.2 of the submitted representations report.

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.

As set out in the accompanying report in Section 6.4.2, the Council should review this proposed policy so it is consistent with the requirements of national policy.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this policy is not consistent with national policy.

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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Please enter **Dudley Local Plan Representation** in the subject field of the email.

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Respondent No:		Representation No:		Date received:	
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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	Transport	Policy	Figure 16.2
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 6.5.1 of the submitted representations report and Figure 6.1.

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.

As set out in the accompanying report in Section 6.5.1, Figure 16.2 incorrectly identifies an active travel route, which should be deleted.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this active travel route should not be identified on this Figure, unless the site is brought forward for development.

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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Respondent No:		Representation No:		Date received:	
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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	Site Allocations	Policy	DLPLGS1
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 | <input checked="" 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 checked="" type="checkbox"/> | 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.

Please see section 7 of the submitted representations report.

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.

As set out in the accompanying report in Section 7, the proposed LGS designation at Land adjacent to Corbett Hospital should be deleted. Instead, the site should be identified as a housing allocation, forming part of Regeneration Corridor RC2 and contributing towards meeting the housing shortfall identified in the draft Plan.

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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Respondent No:		Representation No:		Date received:	
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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:

To provide the opportunity to discuss this matter with the Inspector and confirm why this designation is inconsistent with national policy, and why the site should be designated as a housing allocation instead.

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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Respondent No:		Representation No:		Date received:	
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