**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 – Reg.19 version October 2024 | | |
| **Paragraph/section** |  | **Policy** | DLP24 |
| **Site** |  | **Policy Map** |  |

*Responses can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy or site in the Dudley Local Plan.*

**Q2. Do you consider the Local Plan is:**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 1. | Legally compliant | YES | Yes  N |  | No |
| 2. | Sound | NO |  |  | No |
| 3 | Complies with the Duty to co-operate | Y | Yes |  | No |

*(Mark as appropriate)*

Please refer to our guidance notes for help with the above definitions - 1 to 3.

**Q3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

There is something of a mismatch between treating the whole of Brierley Hill as a tier one centre and three towns as tier two. Brierley Hill actually consists to two separate town centres – the Strategic centre of Merry Hill and the town centre of Brierley Hill proper (the High Street, etc). There is a spatial separation between the two, including in elevation. Development between them is unlikely to change that. Merry Hill Centre should be specified as tier-1, with Brierley Hill High Street, etc as at most tier-2. This will simplify the drafting of DLP24.5, enabling protection for floors 1 and 2 at Merry Hill Centre, but only ground floor in four more traditional town centres.

The Brierley Hill Town Centre boundary includes an area west of Pedmore Road, which is wholly or mainly Saltwells Nature Reserve. This seems peculiar, even bizarre. It would be much better to use that road as the boundary. Including it in the Town Centre suggests some sinister (and unwelcome) motive for it to be developed. If the objective is to provide some green open space for the Merry Hill Centre, it is a bizarre inclusion. It would be better to reduce the target sought to be met for Merry Hill Centre, explaining that this is compensated for by Saltwells being nearby.

*Continue on a separate sheet if necessary.*

**For official use only**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Respondent No: |  | Representation No: |  | Date received: |  |

**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.**

* In defining the retail hierarchy split the present “town centre” of Brierley Hill into Brierley Hill proper (its High Street and adjacent streets) on the one hand as a Tier 2 centre and the Merry Hill Centre as the Borough’s one Tier one centre. Dudley Canal would make a suitable boundary between the two, but it would be possible to define the boundary of Brierley Hill proper as not extending beyond the bypass.
* Exclude Saltwells Wood and adjoining land from the Town Centre, making Pedmore Road the boundary.
* Redraft DLP24.5 to reflect these changes.

*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: |  |

**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)

Y**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:**

CPRE the Countryside Charity is a leading charity campaigning for good planning.

Its primary objective is the protection of rural England, but this includes camapigning for good urban

Planning to prevent towns sprawling into the countryside. We wish to be heard in order that the

Inspector hears views other than from developers, who are pushing the opportunity to develop

sites that they own.

***Please note,*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

***Representations cannot be kept confidential and will be available for public scrutiny, including your name and/***

***or organisation (if applicable). However, your contact details will not be published.***

Completed representations forms can be submitted by emailing: [**planning.policy@dudley.gov.uk**](mailto:planning.policy%40dudley.gov.uk?subject=)

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.**

**For official use only**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Respondent No: |  | Representation No: |  | Date received: |  |