

# Representation form

## Dudley Local Plan Publication Plan

Consultation October 2024

DUDLEY LOCAL PLAN



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

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

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

Comments can be submitted:

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

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

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

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

This form has three sections:

**Section A:** Personal details

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

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

**Please note:**

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

Individual acknowledgement of receipt will not be possible.



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Respondent No:		Representation No:		Date received:	
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## 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)	Harworth Group	
House No./Street	c/o Agent	
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.

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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.*

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## Declaration:

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

.....  
.....

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.

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

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

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

**Thank you for taking the time to provide your response.**

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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Introduction	<b>Policy</b>	
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |   |  |
|---|---|--|
| 1. Legally compliant                    | <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 2.1 of the submitted representations report.

Continue on a separate sheet if necessary.

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**Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As set out in the accompanying report in Section 2.1, 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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**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](mailto:planning.policy@dudley.gov.uk)

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

Alternatively, completed consultation forms can also be submitted by post to: **Planning Policy, Planning Services, Dudley Council, Council House, Priory Road, Dudley DY1 1HF by 5pm 29 November 2024.**

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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Context of the Local Plan	<b>Policy</b>	
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 2.8 of the submitted representations report.

Continue on a separate sheet if necessary.

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**Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As set out in the accompanying report in Section 2.8, 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.*

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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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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Spatial Vision	<b>Policy</b>	
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 3.1 of the submitted representations report.

Continue on a separate sheet if necessary.

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**Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As set out in the accompanying report in Section 3.1, 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.*

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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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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Spatial Strategy	<b>Policy</b>	DLP1
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 4.1 of the submitted representations report.

Continue on a separate sheet if necessary.

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**Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As set out in the accompanying report in Section 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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**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.**

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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?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Spatial Strategy	<b>Policy</b>	DLP2
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                          |    |
|---|-------------------------------------|-----|--------------------------|----|
| 1. Legally compliant                    | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| 2. Sound                                | <input checked="" type="checkbox"/> | Yes | <input 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 4.4 of the submitted representations report.

Continue on a separate sheet if necessary.

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**Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As set out in the accompanying report in Section 4.4 the proposed policy approach to the Growth Network is supported, in particular the vision for Regeneration Corridor 3 and the proposed allocation H017.

*Continue on a separate sheet if necessary.*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

*After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

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**Q5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

**No**, I do not wish to participate in hearing session(s)

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

***Please note**, that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

**Q6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

n/a

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

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

Completed representations forms can be submitted by emailing: [planning.policy@dudley.gov.uk](mailto:planning.policy@dudley.gov.uk)

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

Alternatively, completed consultation forms can also be submitted by post to: **Planning Policy, Planning Services, Dudley Council, Council House, Priory Road, Dudley DY1 1HF by 5pm 29 November 2024.**

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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?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Housing	<b>Policy</b>	DLP10
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 of the submitted representations report.

Continue on a separate sheet if necessary.

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**Q4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q3. above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As set out in Section 5 of the accompanying report, the proposed continued allocation of the land promoted by Harworth Group is supported, given the evidence provided to confirm Harworth's intentions to bring the wider site allocation forward for development. However the overall number of dwellings to be planned for by the Local Plan should be reviewed in order to ensure that the Council is planning to meet its housing needs in full within an appropriate Plan period.

*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:**

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

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

Completed representations forms can be submitted by emailing: [planning.policy@dudley.gov.uk](mailto:planning.policy@dudley.gov.uk)

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

Alternatively, completed consultation forms can also be submitted by post to: **Planning Policy, Planning Services, Dudley Council, Council House, Priory Road, Dudley DY1 1HF by 5pm 29 November 2024.**

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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Housing	<b>Policy</b>	DLP12
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |   |  |
|---|---|--|
| 1. Legally compliant                    | <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 sections 5.3 and 5.4 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 5.4 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.

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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?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Employment	<b>Policy</b>	DLP21
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                          |    |
|---|-------------------------------------|-----|--------------------------|----|
| 1. Legally compliant                    | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| 2. Sound                                | <input checked="" type="checkbox"/> | Yes | <input 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 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.**

n/a

*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:**

n/a

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

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

Completed representations forms can be submitted by emailing: [planning.policy@dudley.gov.uk](mailto:planning.policy@dudley.gov.uk)

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

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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?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Environment	<b>Policy</b>	DLP32
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 7.1 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 7.1 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.**

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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Environment	<b>Policy</b>	DLP33
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 7.2 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 7.2 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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**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?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Environment	<b>Policy</b>	DLP39
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 7.4 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 7.4 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.*

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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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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?

<b>Title of document</b>	Dudley Local Plan - Part 1 Spatial Strategy and Policies		
<b>Paragraph/section</b>	Climate Change	<b>Policy</b>	DLP41, DLP43, DLP47
<b>Site</b>		<b>Policy Map</b>	

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

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

- |   |                                     |     |                                     |    |
|---|-------------------------------------|-----|-------------------------------------|----|
| 1. Legally compliant                    | <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 8.1 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 8.1, 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.*

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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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## Part C: Representation

(Please fill a separate sheet for each representation you wish to make)

### Q1. To which part of the document does this response relate?

<b>Title of document</b>	Dudley Local Plan - Part 2 Centres and Site Allocations		
<b>Paragraph/section</b>	Site Allocations	<b>Policy</b>	
<b>Site</b>	H017	<b>Policy Map</b>	

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

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

- |   |                                     |     |                          |    |
|---|-------------------------------------|-----|--------------------------|----|
| 1. Legally compliant                    | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| 2. Sound                                | <input checked="" type="checkbox"/> | Yes | <input 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 9 of the submitted representations report, supporting the continued allocation of this site.

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.**

n/a

*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:**

n/a

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

**Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.**

Completed representations forms can be submitted by emailing: [planning.policy@dudley.gov.uk](mailto:planning.policy@dudley.gov.uk)

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

Alternatively, completed consultation forms can also be submitted by post to: **Planning Policy, Planning Services, Dudley Council, Council House, Priory Road, Dudley DY1 1HF by 5pm 29 November 2024.**

**For official use only**

Respondent No:		Representation No:		Date received:	
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