

Sustainability Appraisal of the Dudley Local Plan

Volume 2 of 2: Appendices

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LEPUS CONSULTING
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Sustainability Appraisal of the Dudley Local Plan

Volume 2 of 2: Appendices to the Regulation 18 SA

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Appendices

[Appendix A – SA Framework](#)

[Appendix B – Site Assessment Methodology and Assumptions](#)

[Appendix C – Assessment of Reasonable Alternative Sites](#)

[Appendix D – Assessment of DLP Part 1 policies \(Spatial Strategy and Policies\)](#)

[Appendix E – Assessment of DLP Part 2 policies \(Allocations and Centres\)](#)

Appendix A: SA Framework

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
1	Cultural heritage: Protect, enhance and manage heritage assets including sites, features and areas of archaeological, historical and cultural heritage importance.	<ul style="list-style-type: none"> Cultural heritage 	a) conserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal? b) conserve or enhance archaeological sites/remains? c) conserve or enhance the setting of cultural heritage assets? d) improve the energy efficiency of historic buildings?	<ul style="list-style-type: none"> Number and condition of historic assets on the Heritage at Risk register. Developments with potential to adversely affect cultural heritage designations or areas of historic value in the DLP area. Statutory and non-statutory sites in the Historic Environment Record (HER) and identified in the HLC.
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	<ul style="list-style-type: none"> Landscape Cultural heritage 	a) safeguard and enhance the character of the landscape and local distinctiveness and identity? b) protect and enhance visual amenity, including light and noise pollution? c) reuse degraded landscapes/townscapes? d) compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl?	<ul style="list-style-type: none"> Tranquillity rating of area. Re-use of brownfield land and/or derelict buildings. Developments with potential to alter existing landscape or townscape character. Developments in the Green Belt which contradict with the findings of the Green Belt Study. Developments in areas identified as being of 'moderate' or 'moderate-high' sensitivity in the Landscape Sensitivity Study.
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	<ul style="list-style-type: none"> Biodiversity Flora Fauna 	a) maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity? b) support positive management of local sites (SLINCs and SINCs) designated for nature conservation and geodiversity value? c) contribute towards wider GI networks and promote habitat connectivity? d) deliver biodiversity net gain?	<ul style="list-style-type: none"> Number and diversity of protected species present in the area. Quality and extent of priority habitats (habitats of principle importance). Area and condition of sites designated for biological and geological interest. Provision and connectivity of GI.

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
				<ul style="list-style-type: none"> Amount of biodiversity net gain provided in new developments measured using the DEFRA Biodiversity Metric.
4	Climate change mitigation: Minimise Dudley’s contribution to climate change.	<ul style="list-style-type: none"> Climatic factors 	a) help to reduce the per capita carbon footprint of Dudley? b) encourage renewable energy generation or use of energy from renewable or low-carbon sources? c) promote sustainable construction principles? d) help to reduce reliance on private car use?	<ul style="list-style-type: none"> Carbon emissions from domestic / industrial / commercial sources. Percentage of energy in the area generated from renewable sources. Proximity to, and frequency of, public transport links. Distance to local services and amenities.
5	Climate change adaptation: Plan for the anticipated levels of climate change.	<ul style="list-style-type: none"> Climatic factors Soil Water 	a) avoid development in areas at high risk of flooding and seek to reduce flood risk? b) increase the coverage and connectivity of GI? c) promote use of technologies and techniques to adapt to the impacts of climate change? d) ensure that new development is resilient to the effects of extreme weather events?	<ul style="list-style-type: none"> Number of properties at risk of flooding. Area of new greenspace created per capita. Area and connectivity of GI. Implementation of adaptive techniques, such as SuDS and passive heating/cooling.
6	Natural resources: Protect and conserve natural resources.	<ul style="list-style-type: none"> Soil Water Material assets 	a) utilise previously developed, degraded and under-used land? b) lead to the loss of the best and most versatile agricultural land? c) lead to the loss or sterilisation of mineral resources, or affect mineral working?	<ul style="list-style-type: none"> Re-use of previously developed or brownfield land. Area of potential BMV agricultural land lost to development. Development within groundwater SPZs. Proposed Mineral Safeguarding Area(s).
7	Pollution: Reduce air, soil, water and noise pollution.	<ul style="list-style-type: none"> Air Water Soil Human health 	a) improve air quality and avoid generating further air pollution? b) conserve soil quality or help to remediate land affected by ground contamination? c) conserve and improve water quality? d) help to reduce noise pollution and protect sensitive receptors from existing ambient noise?	<ul style="list-style-type: none"> Number of exceedances in NO₂, PM₁₀ or PM_{2.5} annual mean objectives within Dudley AQMA. Development with potential to generate a significant increase in road traffic emissions or other air pollutants. Area of contaminated land remediated.

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
				<ul style="list-style-type: none"> Proximity to watercourses or groundwater receptors. Ecological and chemical status of waterbodies within the DLP area and downstream. Percentage change in pollution incidents.
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	<ul style="list-style-type: none"> Population Material assets 	a) encourage recycling, re-use and composting of waste? b) minimise and where possible eliminate generation of waste, during both construction and occupation of development?	<ul style="list-style-type: none"> Number and capacity of waste management facilities. Rate of recycling and composting. Management of local authority collected waste.
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	<ul style="list-style-type: none"> Climatic factors Population Material assets 	a) reduce the need to travel and/or reduce travel time? b) provide adequate means of access by a range of sustainable transport modes (i.e. walking, cycling, and public transport)? c) support a modal shift away from private car use?	<ul style="list-style-type: none"> Proximity and connectivity of walking and cycling links. Proximity to public transport links including bus services, metro and rail. Frequency of bus services. Provision or expansion of public transport and active travel infrastructure. Distance / travel times to place of work, local amenities and key services.
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	<ul style="list-style-type: none"> Population 	a) provide a mix of good-quality housing, including homes that are suitable for first-time buyers? b) provide housing suitable for the growing elderly population? c) provide decent, affordable, and accessible homes?	<ul style="list-style-type: none"> Varied housing mix. Percentage of dwellings delivered as affordable housing. Number of extra care homes. Provision of pitches and plots for Gypsies, Travellers and Travelling Showpeople.
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	<ul style="list-style-type: none"> Population Human health 	a) eliminate unlawful discrimination, victimisation and harassment? b) reduce crime and the fear of crime? c) create safe neighbourhoods and support community cohesion?	<ul style="list-style-type: none"> Indices of Multiple Deprivation. Level of qualifications e.g. number of people with NVQ2. Rates of crime.

#	SA Objective	Relevant SEA Regulations topics	Decision making criteria: Will the option / proposal...	Indicators (this list is not exhaustive)
			d) advance equality of opportunity? e) help to achieve life-long learning and increase learning participation and adult education?	<ul style="list-style-type: none"> Provision of and access to community facilities including libraries and local centres. Provision of accessible and adaptable homes to meet the needs of the population.
12	Health: Safeguard and improve community health, safety and wellbeing.	<ul style="list-style-type: none"> Human health Population 	a) improve sustainable access for all to health, leisure and recreational facilities? b) improve and enhance Dudley’s GI network? c) improve road safety? d) consider the needs of Dudley’s growing elderly population?	<ul style="list-style-type: none"> Travel time by active travel and/or public transport to healthcare facilities and services. Provision and accessibility of open greenspace and GI. Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	<ul style="list-style-type: none"> Population Material assets 	a) improve sustainable access to employment opportunities? b) encourage business start-ups in the DLP area? c) protect and enhance the vitality and viability of existing employment and retail areas? d) protect and create jobs?	<ul style="list-style-type: none"> Proximity and sustainable accessibility to employment opportunities. Number of residents working within Dudley, and rates of unemployment. Number of new business start-ups as a result of the development. Total amount of employment land. Number of vacant units in strategic centres.
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	<ul style="list-style-type: none"> Population 	a) improve sustainable access for all to education and training opportunities? b) encourage a diversity of education and training opportunities? c) Support the provision of an appropriately skilled workforce?	<ul style="list-style-type: none"> Proximity to education and training, particularly primary schools and secondary schools. Provision of new education and training facilities and opportunities. Accessibility of education and training facilities by public transport. Capacity of local schools to meet demand from new development.

Appendix B: Site Assessment Methodology and Assumptions

Appendix D Contents

B.1 Introduction	B1
B.2 SA Objective 1: Cultural heritage	B2
B.3 SA Objective 2: Landscape	B7
B.4 SA Objective 3: Biodiversity, flora, fauna and geodiversity	B9
B.5 SA Objective 4: Climate change mitigation	B14
B.6 SA Objective 5: Climate change adaptation	B16
B.7 SA Objective 6: Natural resources	B18
B.8 SA Objective 7: Pollution	B20
B.9 SA Objective 8: Waste	B23
B.10 SA Objective 9: Transport and accessibility	B25
B.11 SA Objective 10: Housing	B28
B.12 SA Objective 11: Equality	B29
B.13 SA Objective 12: Health	B30
B.14 SA Objective 13: Economy	B33
B.15 SA Objective 14: Education, skills and training	B35

Receptor Boxes

Box B.2.1: SA Objective 1: Grade I Listed Buildings	B3
Box B.2.2: SA Objective 1: Grade II* Listed Buildings	B3
Box B.2.3: SA Objective 1: Grade II Listed Buildings.....	B3
Box B.2.4: SA Objective 1: Scheduled Monuments.....	B4
Box B.2.5: SA Objective 1: Registered Parks and Gardens.....	B4
Box B.2.6: SA Objective 1: Conservation Areas	B4
Box B.2.7: SA Objective 1: Archaeological Priority Areas	B5
Box B.2.8: SA Objective 1: Historic Environment Area Designations	B5
Box B.3.1: SA Objective 2: Landscape sensitivity	B7
Box B.4.1: SA Objective 3: Habitats sites	B10
Box B.4.2: SA Objective 3: SSSI.....	B10
Box B.4.3: SA Objective 3: NNR.....	B11
Box B.4.4: SA Objective 3: Ancient woodland.....	B11
Box B.4.5: SA Objective 3: LNR	B12
Box B.4.6: SA Objective 3: SINC	B12
Box B.4.7: SA Objective 3: SLINC	B12
Box B.4.8: SA Objective 3: Geological conservation	B13
Box B.4.9: SA Objective 3: Priority habitats.....	B13
Box B.5.1: SA Objective 4: Carbon emissions	B14
Box B.6.1: SA Objective 5: Fluvial flooding.....	B16
Box B.6.2: SA Objective 5: Surface water flooding.....	B16
Box B.6.3: SA Objective 5: Indicative Flood Zone	B17
Box B.7.1: SA Objective 6: Previously developed land.....	B18
Box B.7.2: SA Objective 6: ALC.....	B18
Box B.8.1: SA Objective 7: AQMA	B20
Box B.8.2: SA Objective 7: Main road	B20
Box B.8.3: SA Objective 7: Water quality	B21
Box B.8.4: SA Objective 7: Groundwater SPZ.....	B21
Box B.8.5: SA Objective 7: Air pollution	B22
Box B.9.1: SA Objective 8: Waste	B23
Box B.10.1: SA Objective 9: Bus stop.....	B25
Box B.10.2: SA Objective 9: Rail and metro	B25
Box B.10.3: SA Objective 9: Pedestrian access.....	B26
Box B.10.4: SA Objective 9: Road access	B26
Box B.10.5: SA Objective 9: Pedestrian access to local services.....	B26
Box B.10.6: SA Objective 9: Public transport access to local services	B27
Box B.11.1: SA Objective 10: Housing provision.....	B28
Box B.12.1: SA Objective 11: IMD	B29
Box B.13.1: SA Objective 12: NHS hospital.....	B30
Box B.13.2: SA Objective 12: Pedestrian access to GP surgery	B30
Box B.13.3: SA Objective 12: Public transport access to GP surgery.....	B31
Box B.13.4: SA Objective 12: Access to / net loss of greenspace	B31
Box B.13.5: SA Objective 12: Access to PRoW / cycle routes.....	B31
Box B.14.1: SA Objective 13: Pedestrian access to employment opportunities	B33
Box B.14.2: SA Objective 13: Public transport access to employment opportunities.....	B33
Box B.14.3: SA Objective 13: Employment floorspace.....	B34
Box B.15.1: SA Objective 14: Pedestrian access to primary school.....	B35
Box B.15.2: SA Objective 14: Pedestrian access to secondary school	B35
Box B.15.3: SA Objective 14: Public transport access to secondary school.....	B36

B.1 Introduction

B.1.1 Overview

- B.1.1.1 This appendix provides additional context to **Chapter 2** of the main Regulation 18 SA Report regarding the methodology used to assess policies and reasonable alternatives within the emerging Dudley Local Plan.
- B.1.1.2 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process for reasonable alternative sites. There are also a number of assumptions and limitations noted within each of the following sections, which should be borne in mind when considering the assessment findings.
- B.1.1.3 The topic-specific methodologies set out in **Boxes B.2.1** to **B.15.3** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 2.4** within the main Regulation 18 SA Report.
- B.1.1.4 All distances stated in site assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.
- B.1.1.5 **Appendix C** sets out the detailed appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives, using the methodology as set out in this appendix.
- B.1.1.6 The level of detail that can be expressed through the SA assessments depends on the level of detail provided associated with the part of the plan in question.

B.2 SA Objective 1: Cultural heritage

B.2.1 Introduction and context

- B.2.1.1 **Boxes B.2.1 to B.2.8** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.
- B.2.1.2 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.
- B.2.1.3 Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Grade I, II* and II Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas (CA).
- B.2.1.4 It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the Local Plan). Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets¹ that are important components of the local area. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.
- B.2.1.5 Heritage assets identified on Historic England's Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment². Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.
- B.2.1.6 It should be noted that not all of Dudley's historic environment resource and heritage assets are subject to statutory designations; non-designated features comprise a significant aspect of heritage, which is often experienced on a daily basis. This may include buildings and other features of historic interest which are not listed, as well as both discovered and undiscovered archaeological remains.

¹ Setting is taken to mean the surroundings in which a heritage asset may be experienced, which does not relate solely to distance from proposed developments to heritage assets. Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 (2nd Edition). Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date accessed: 27/06/23]

² Historic England (2022) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 20/06/23]

B.2.1.7 It is anticipated that DMBC will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

B.2.2 Cultural heritage receptors

Box B.2.1: SA Objective 1: Grade I Listed Buildings

Score	Likely Impact - Grade I Listed Buildings
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
-	Development proposal located within the wider setting of a Grade I Listed Building.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.
Notes	
Grade I Listed Buildings are considered to be those of exceptional interest. Data available from Historic England ³ .	

Box B.2.2: SA Objective 1: Grade II Listed Buildings*

Score	Likely Impact - Grade II* Listed Buildings
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
-	Development proposal located within the setting of a Grade II* Listed Building.
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.
Notes	
Grade II* Listed Buildings are considered to be those of more than special interest. Data available from Historic England ⁴ .	

Box B.2.3: SA Objective 1: Grade II Listed Buildings

Score	Likely Impact - Grade II Listed Buildings
--	Development proposal coincides with a Grade II Listed Building.
-	Development proposal located within the setting of a Grade II Listed Building.
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.

³ Historic England (2023) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 20/06/23]

⁴ Ibid

Score	Likely Impact - Grade II Listed Buildings
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.
Notes	
Grade II Listed Buildings are considered to those of special interest. Data available from Historic England ⁵ .	

Box B.2.4: SA Objective 1: Scheduled Monuments

Score	Likely Impact- Scheduled Monuments
--	Development proposal coincides with a SM.
-	Development proposal located within the setting of a SM.
0	Development proposal not considered to impact an SM or its setting.
+	Development proposal which could potentially enhance an SM or its setting.
Notes	
Scheduling is the selection of a sample of nationally important archaeological sites. Data available from Historic England ⁶ .	

Box B.2.5: SA Objective 1: Registered Parks and Gardens

Score	Likely Impact - Registered Parks and Gardens
--	Development proposal coincides with an RPG.
-	Development proposal located within the setting of an RPG.
0	Development proposal not considered likely to impact an RPG or its setting.
+	Development proposal which could potentially enhance an RPG or its setting.
Notes	
The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection. Data available from Historic England ⁷ .	

Box B.2.6: SA Objective 1: Conservation Areas

Score	Likely Impact - Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.
0	Development proposal not considered to impact a Conservation Area or its setting.

⁵ Ibid

⁶ Ibid

⁷ Ibid

Score	Likely Impact - Conservation Areas
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.
Notes	
Conservation Area (CA) data provided by DMBC, with further information regarding Dudley’s CAs available on the Council website ⁸ .	

Box B.2.7: SA Objective 1: Archaeological Priority Areas

Score	Likely Impact - Archaeological Priority Area
-	Development proposal coincides with an APA.
0	Development proposal does not coincide with an APA.
+	Development proposal which could potentially enhance an APA.
Notes	
<p>The Black Country Historic Landscape Characterisation (HLC) Study⁹ aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country, including Dudley. The study also identified a number of Archaeological Priority Areas (APAs), which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest.</p> <p>APA data has been provided by DMBC and is detailed within the HLC report.</p>	

Box B.2.8: SA Objective 1: Historic Environment Area Designations

Score	Likely Impact - Historic Environment Area Designations
-	Development proposal located within an area of high historic landscape or townscape value and/or area designed landscape of high historic value
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes
+	Development proposal which could potentially enhance historic character.
Notes	
<p>The Black Country HLC Study¹⁰ aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country, including Dudley. The study identified several Historic Environment Area Designations (HEADs) within Dudley’s Green Belt and in the urban area.</p> <p>Areas of High Historic Townscape Value (AHHTVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the HLC. AHHTVs are areas “<i>where built heritage makes a significant contribution to the local character and distinctiveness</i>” and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are “<i>designed landscapes</i>”</p>	

⁸ Dudley Metropolitan Borough Council (2022) Conservation Areas. Available at: <https://www.dudley.gov.uk/residents/planning/historic-environment/conservation-areas/> [Date accessed: 31/05/23]

⁹ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 20/06/23]

¹⁰ Ibid

Notes

that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens” and have been identified due to the date, preservation, aesthetics, and associations with people and past events.

HLC data has been provided by DMBC and is detailed within the HLC report.

B.3 SA Objective 2: Landscape

B.3.1 Introduction and context

B.3.1.1 **Box B.3.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.

B.3.1.2 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

B.3.1.3 Cannock Chase Area of Outstanding Natural Beauty (AONB) lies approximately 15km to the north of Dudley Borough at its closest point. Given this distance, and at this stage of the assessment process, there is unlikely to be any significant adverse effects on the special qualities of the AONB arising from the reasonable alternative development sites. It is assumed that any future development would be accompanied by a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA) if necessary to consider any potential for adverse impacts.

B.3.1.4 There is no evidence available to inform the SA assessments with regard to the landscape character or sensitivity of Dudley's urban areas. Information relating to the historic environment, including the HLC and associated designations has been assessed under SA Objective 1: Cultural Heritage (see **Box B.2.8**).

B.3.2 Landscape receptors

Box B.3.1: SA Objective 2: Landscape sensitivity

Score	Likely Impact - Landscape Sensitivity Assessment
--	Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.
-	Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.
+/-	Development proposals located outside of the Landscape Sensitivity Assessment study area.
0	Development proposals located within areas of 'low' sensitivity.
+	Development proposals which would protect or enhance features of the landscape as identified within the study.

Notes

Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment¹¹, which assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Green Belt land is susceptible to change as a result of future development. Parcels of land were classified ranging from 'high' to 'low' sensitivity.

As all reasonable alternative development sites within the DLP lie outside of the Green Belt, the potential effects of each site on sensitive landscapes are uncertain and would benefit from further site-specific studies to identify any local sensitive views or landscapes.

¹¹ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at:
https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 20/06/23]

B.4 SA Objective 3: Biodiversity, flora, fauna and geodiversity

B.4.1 Introduction and context

B.4.1.1 **Boxes B.4.1 to B.4.9** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

B.4.1.2 The biodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area.

B.4.1.3 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

B.4.1.4 It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as due to the loss of stepping-stones and corridors. This will restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 6) in this assessment.

B.4.1.5 It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.

B.4.1.6 Protected species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.

B.4.1.7 It is anticipated that the Council will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.

B.4.1.8 It is assumed that mature trees and hedgerows will be retained where possible.

B.4.2 Biodiversity receptors

Box B.4.1: SA Objective 3: Habitats sites

Score	Likely Impact - Habitats site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is located in close proximity to, a Habitats site. Likelihood of direct impacts.
-	Development proposal is located within a recognised ZoI or similar spatial catchment relative to the Habitats site. Likelihood of direct or indirect impacts.
+/-	Development located outside of a recognised ZoI where, in absence of HRA conclusions, the effect of development is uncertain.
0	Development not anticipated to result in adverse impacts on Habitats sites.
+	Development proposals which would be expected to enhance features within a Habitats site.

Notes

The area within which development proposals could potentially have direct, indirect and in-combination impacts on the integrity of a Habitats site is referred to as the Zone of Influence (ZOI). This is determined through an identification of sensitive receptors at each Habitats site (its qualifying features) and pathways via which the Local Plan may have an impact. At this stage, no ZOI have been formally identified for surrounding Habitats sites, and so at this stage of the assessment process, the potential impact of each development site is uncertain. It should be noted that the impact of proposed sites on Habitats sites will be tested through the Habitats Regulations Assessment (HRA) process, the findings of which will be used to inform the Regulation 19 SA. The HRA will provide further detail relating to potential impacts on Habitats sites within and surrounding the Plan area.

Data for Habitats sites is available from Natural England¹².

Box B.4.2: SA Objective 3: SSSI

Score	Likely Impact - SSSI
--	Development coincides with, or is located adjacent to, an SSSI.
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.
+	Development proposals which would enhance features of an SSSI.

Notes

Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool developed by Natural England which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

Where a site falls within more than one SSSI IRZ the worst-case risk zone is reported upon in the assessment.

¹² Natural England (2023) Special Areas of Conservation (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0_0 [Date accessed: 20/06/23]

Notes
Data for SSSIs and IRZs is available from Natural England ¹³ .

Box B.4.3: SA Objective 3: NNR

Score	Likely Impact - NNR
--	Development coincides with an NNR. Likelihood of direct impacts.
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on NNRs.
+	Development proposals which would enhance or create an NNR.

Notes
National Nature Reserves (NNRs) were established to protect some of England’s most important habitats, species and geology, and to provide ‘outdoor laboratories’ for research. Data for NNRs is available from Natural England ¹⁴ .

Box B.4.4: SA Objective 3: Ancient woodland

Score	Likely Impact - Ancient woodland
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.
0	Development proposal would not be anticipated to impact ancient woodland.
+	Development proposals which would enhance ancient woodland.

Notes
Ancient woodland is defined as an area that has been wooded continuously since at least 1600AD and includes ‘ancient semi-natural woodland’ and ‘plantations on ancient woodland sites’, both of which have equal protection under the NPPF ¹⁵ . Data for ancient woodlands is available from Natural England ¹⁶ .

¹³ Natural England (2023) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest, 25 May 2023. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date accessed: 20/06/23]

¹⁴ Natural England (2023) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date accessed: 20/06/23]

¹⁵ Forestry Commission and Natural England (2022) Ancient woodland, ancient trees and veteran trees: protecting them from development. Available at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> [Date accessed: 20/06/23]

¹⁶ Natural England (2023) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdc7e9df7d3/ancient-woodland-england> [Date accessed: 20/06/23]

Box B.4.5: SA Objective 3: LNR

Score	Likely Impact - LNR
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes
Local Nature Reserves (LNRs) are statutory designations, representing places with wildlife or geological features that are of special interest locally, which give people special opportunities to study and learn about them or simply enjoy and have contact with nature. Data for LNRs is available from Natural England ¹⁷ .

Box B.4.6: SA Objective 3: SINC

Score	Likely Impact - SINC
--	Development proposal coincides with a SINC. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SINC.
+	Development proposals which would enhance or create a SINC.

Notes
Sites of Importance for Nature Conservation (SINCs) are non-statutory designated sites of Birmingham and the Black Country importance ¹⁸ . They are endorsed by the Birmingham and Black Country Local Sites Partnership. Data for SINCs has been provided by DMBC.

Box B.4.7: SA Objective 3: SLINC

Score	Likely Impact - SLINC
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SLINC.
+	Development proposals which would enhance or create a SLINC.

¹⁷ Natural England (2023) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date accessed: 21/06/23]

¹⁸ EcoRecord (2009) Sites of Importance for Nature Conservation (SINCs). Available at: <http://www.ecorecord.org.uk/index.php?q=local-sites/sincs> [Date accessed: 20/06/23]

Notes
Sites of Local Importance for Nature Conservation (SLINCs) are non-statutory designated sites of borough importance ¹⁹ . They are endorsed by the Birmingham and Black Country Local Sites Partnership, and then adopted by DMBC. Data for SLINCs has been provided by DMBC.

Box B.4.8: SA Objective 3: Geological conservation

Score	Likely Impact - Geological Conservation
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.
+	Development proposal anticipated to enhance a geological site.

Notes
Data for geological sites provided by DMBC and data for underlying geological context provided by British Geological Survey.

Box B.4.9: SA Objective 3: Priority habitats

Score	Likely Impact - Priority Habitat
-	Development proposal coincides with a priority habitat.
0	Development proposal does not coincide with a priority habitat.
+	Development proposals which enhance or create a priority habitat.

Notes
For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England’s publicly available Priority Habitat Inventory database ²⁰ . It is acknowledged this may not reflect current local site conditions in all instances.

¹⁹ EcoRecord (2009) Sites of Local Importance for Nature Conservation (SLINCs). Available at: <http://www.ecorecord.org.uk/index.php?q=local-sites/slincs> [Date accessed: 20/06/23]

²⁰ Natural England (2023) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 20/06/23]

B.5 SA Objective 4: Climate change mitigation

B.5.1 Introduction and context

B.5.1.1 **Box B.5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.

B.5.1.2 The incorporation of GI within developments presents several opportunities to mitigate climate change, for example, through providing natural cooling to combat the ‘urban heat island’ effect, reducing the effects of air pollution and providing more pleasant outdoor environments to encourage active travel²¹.

B.5.1.3 However, it is likely that new development would result in an increase in local greenhouse gas (GHG) emissions due to the increase in the local population and the number of operating businesses. The increase in GHG emissions caused by new developments is often associated with impacts of the construction phase, the occupation and operation of homes and businesses, fuel consumption and increases in local road transport with associated emissions. This impact is considered to be permanent and non-reversible.

B.5.1.4 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. The 1% principle as set out in **Box B.5.1** is only a coarse precautionary indicator, and greater detail of carbon data would help to better quantify effects.

B.5.2 Climate change mitigation receptors

Box B.5.1: SA Objective 4: Carbon emissions

Score	Likely Impact - Carbon Emissions
--	Residential-led development which could potentially result in an increase in CO ₂ emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO ₂ emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO ₂ emissions.
+/-	Non-residential or Gypsy and Traveller development where the carbon emissions produced as a result of the proposed development is uncertain.
+	Development proposals which include energy saving or renewable energy technologies. Development proposals which would reduce reliance on private car use, encourage active travel or the use of public transport.

²¹ TCPA (2023) What is Green Infrastructure? Available at: <https://www.tcpa.org.uk/what-is-green-infrastructure/> [Date accessed: 21/06/23]

Notes

The estimated total CO₂ emissions for Dudley in 2020 was 1,013,459.7 tonnes, with per capita emissions of 3.1 tonnes, according to UK local authority CO₂ emissions data²². Dudley has an average of 2.3 people per dwelling²³.

Based on these figures, and assuming new residents will generate CO₂ emissions in line with the current average, it has been calculated that proposals for 1,400 homes or more would potentially increase carbon emissions by 1% or more in comparison to the current estimates for Dudley. Proposals for 140 homes or more would increase carbon emissions by 0.1% or more in comparison to current estimates for Dudley.

²² DBEIS (2022) UK local authority and regional carbon dioxide emissions national statistics: 2005-2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date accessed: 21/06/23]

²³ People per Dwelling has been calculated using the ONS mid-2021 population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

B.6 SA Objective 5: Climate change adaptation

B.6.1 Introduction and context

B.6.1.1 **Boxes B.6.1 to B.6.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

B.6.1.2 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

B.6.2 Climate change adaptation receptors

Box B.6.1: SA Objective 5: Fluvial flooding

Score	Likely Impact - Fluvial Flooding
--	Development proposals which coincide with Flood Zone 3.
-	Development proposals which coincide with Flood Zone 2.
+	Development proposals which are located wholly within Flood Zone 1.

Notes

Data for fluvial flooding has been derived from the latest available Environment Agency Flood Map for Planning (Rivers and Sea)²⁴, such that:

- **Flood Zone 3:** Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year;
- **Flood Zone 2:** Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and
- **Flood Zone 1:** Less than 0.1% chance of river and sea flooding in any given year.

Box B.6.2: SA Objective 5: Surface water flooding

Score	Likely Impact - Surface Water Flooding
--	Development proposals which coincide with areas at high risk of surface water flooding.
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.

²⁴ Environment Agency (2023) Flood Map for Planning (Rivers and Sea) – Flood Zone 2 and Flood Zone 3. Available at: <https://www.data.gov.uk/dataset/cf494c44-05cd-4060-a029-35937970c9c6/flood-map-for-planning-rivers-and-sea-flood-zone-2> and <https://www.data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3> [Date accessed: 19/09/23]

Score	Likely Impact - Surface Water Flooding
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures

Notes
<p>The assessment is based on the Environment Agency surface water flood risk data²⁵, such that:</p> <ul style="list-style-type: none"> • High risk: more than 3.3% chance of flooding each year; • Medium risk: between 1% - 3.3% chance of flooding each year; and • Low risk: between 0.1% - 1% chance of flooding each year. <p>Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on surface water flooding for the purposes of this assessment.</p>

Box B.6.3: SA Objective 5: Indicative Flood Zone

Score	Likely Impact - Indicative Flood Zone
--	Development proposals which coincide with Indicative Flood Zone 3b.
0	Development proposals which do not coincide with Indicative Flood Zone 3b.

Notes
<p>Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in future due to climate change. Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA)²⁶.</p>

²⁵ Environment Agency (2021) Risk of Flooding from Surface Water Extent: 3.3 percent annual chance, 1 percent annual chance, 0.1 percent annual chance (updated 14 May 2021). Available at: <https://www.data.gov.uk/dataset/95ea1c96-f3dd-4f92-b41f-ef21603a2802/risk-of-flooding-from-surface-water-extent-3-3-percent-annual-chance> [Date accessed: 14/09/23]

²⁶ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 20/06/23]

B.7 SA Objective 6: Natural resources

B.7.1 Introduction and context

- B.7.1.1** **Boxes B.7.1** to **B.7.2** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.
- B.7.1.2** In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.
- B.7.1.3** The natural resources objective also considers potential effects on mineral resources. Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. There are no Mineral Safeguarding Areas or Areas of Search identified within Dudley in the Black Country Minerals Study²⁷; as such all reasonable alternative development sites would be expected to have a negligible impact on mineral resources based on the current evidence available.

B.7.2 Natural resources receptors

Box B.7.1: SA Objective 6: Previously developed land

Score	Likely Impact - Previously Developed (Brownfield) Land / Land with Environmental Value
-	Development proposals located on previously undeveloped land or brownfield land with potential environmental value.
+	Development proposals located on previously developed land with no environmental value.

Notes
Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF ²⁸ . Assessment of current land use and potential environmental value has been made through reference to aerial photography and the use of Google Maps. It should be noted that this may not reflect the current status of the site, and the nature of development within the site boundary is unknown, so a degree of uncertainty remains.

Box B.7.2: SA Objective 6: ALC

Score	Likely Impact - ALC
--	Development proposals which are situated on Grade 1, 2 or 3 ALC land comprising 20ha or more.
-	Development proposals which are situated on Grade 1, 2 or 3 ALC land comprising less than 20ha.
0	Development proposals located on previously developed land with no environmental value.

²⁷ wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date accessed: 20/06/23]

²⁸ Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/06/23]

Score	Likely Impact - ALC
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.
Notes	
<p>The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land²⁹. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land. ALC data is available from Natural England³⁰.</p> <p>A 20ha threshold has been used based on Natural England guidance³¹.</p>	

²⁹ MAFF. October 1988. Available at Natural England.

<http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date Accessed: 20/06/23]

³⁰ Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094 [Date accessed: 20/06/23]

³¹ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 21/06/23]

B.8 SA Objective 7: Pollution

B.8.1 Introduction and context

B.8.1.1 **Boxes B.8.1 to B.8.5** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.

B.8.1.2 The assessment under this objective considers the potential for reasonable alternative sites to generate pollution associated with the construction and occupation of new development, as well as the potential to expose site end users to existing sources of pollution.

B.8.2 Pollution receptors

Box B.8.1: SA Objective 7: AQMA

Score	Likely Impact - AQMA
-	All development proposals in Dudley are located within an AQMA.

Notes

Air Quality Management Areas (AQMAs) are considered to be an area where the national air quality objective will not be met. Introducing new development within an AQMA would therefore be expected to expose new residents to poor air quality. UK AQMA data is available from Defra³².

Box B.8.2: SA Objective 7: Main road

Score	Likely Impact - Main road
-	Development proposals located within 200m of a main road.
0	Development proposals located over 200m from a main road.
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.

Notes

It is assumed that sites located in close proximity to main roads would expose site end users to transport associated noise and air pollution. Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution.

In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road^{33 34}. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "beyond 200m from the link centre, the contribution of vehicle emissions to

³² Department for Environment Food and Rural Affairs (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 20/06/23]

³³ Design Manual for Roads and Bridges (2019) LA 105 Air Quality. Available at: <https://www.standardsforhighways.co.uk/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date Accessed: 20/06/23]

³⁴ Design Manual for Roads and Bridges (2019) LA 104 Environmental assessment and monitoring. Available at: <https://www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a> [Date accessed: 20/06/23]

Notes

*local pollution levels is not significant*³⁵. A 200m buffer distance from main roads (motorways and A-roads) has therefore been applied in this assessment. Road data is available from Ordnance Survey³⁶.

Box B.8.3: SA Objective 7: Water quality

Score	Likely Impact - Water quality
-	Development proposals located within 10m of a watercourse.
+/-	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

Notes

Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water. A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance³⁷³⁸. However, it should be noted that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff and should be considered on a site-by-site basis; as such, sites over 10m from a watercourse are scored as 'uncertain' in this assessment.

Watercourse mapping data is available from the Ordnance Survey³⁹.

Box B.8.4: SA Objective 7: Groundwater SPZ

Score	Likely Impact - Groundwater SPZ
-	Development proposal coincides with a groundwater SPZ.
0	Development proposal does not coincide with a groundwater SPZ.

Notes

The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any site that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality. Groundwater source catchments are divided into three zones:

- Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;
- Outer Zone (Zone II) – 400-day travel time; and

³⁵ Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 20/03/23]

³⁶ Ordnance Survey (2023) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 20/06/23]

³⁷ DAERA (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 21/06/23]

³⁸ Wild Trout Trust. Buffer Zones. Available at: <https://www.wildtrout.org/content/buffer-zones> [Date accessed: 21/06/23]

³⁹ Ordnance Survey (2023) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 21/06/23]

Notes
<ul style="list-style-type: none"> Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source. <p>SPZ data is available from the Environment Agency⁴⁰.</p>

Box B.8.5: SA Objective 7: Air pollution

Score	Likely Impact - Increase in Air Pollution
--	Development proposals which could potentially result in a significant increase in air pollution.
-	Development proposals which could potentially result in a minor increase in air pollution.
0	Development would be expected to result in a negligible increase in air pollution.
+/-	The air pollution likely to be generated as a result of development proposals is uncertain. Including residential-led development sites for which the net housing capacity was unknown at the time of writing, and development proposals for Gypsy and Traveller use.

Notes
<p>It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution⁴¹. Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.</p> <p>Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.</p>

⁴⁰ Environment Agency (2023) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 21/06/23]

⁴¹ Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8. Available at: <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> [Date accessed: 21/06/23]

B.9 SA Objective 8: Waste

B.9.1 Introduction and context

B.9.1.1 **Box B.9.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.

B.9.1.2 It is expected that new development would result in an increase in the local population, and consequently an increase in household waste generation.

B.9.1.3 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment against waste. The 1% principle as set out in **Box B.9.1** is only a coarse precautionary indicator, and greater detail of waste data would help to better quantify effects. The amount and type of waste produced will vary depending upon the specific site circumstances and end use, and may have differing implications for the management of waste; such detail is not available to inform the assessment of reasonable alternative sites.

B.9.2 Waste receptors

Box B.9.1: SA Objective 8: Waste

Score	Likely Impact - Waste
--	Residential-led development which could potentially result in an increase in household waste generation by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in household waste generation by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in household waste generation.
+/-	The waste generated as a result of development proposals for non-residential or Gypsy and Traveller use is uncertain.
+	Development proposals which include provision of waste and recycling storage.
++	Development proposals for waste or recycling facilities.
Notes	
The estimated total household waste produced within Dudley in 2021/2022 was 127,424 tonnes, according to UK local authority household waste data ⁴² . It is assumed that new residents in Dudley will have an annual	

⁴² Department for Environment, Food and Rural Affairs (2022) Local Authority Collected Waste Statistics. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date accessed: 21/06/23]

Notes

waste production of 399kg per person, in line with the England average⁴³. Dudley has an average of 2.3 people per dwelling⁴⁴.

Based on these figures, and assuming new residents will generate waste in line with the current average, it has been calculated that proposals for 1,387 homes or more would potentially increase household waste generation by 1% or more in comparison to the current estimates for Dudley. Proposals for 139 homes or more would increase household waste generation by 0.1% or more in comparison to current estimates for Dudley.

⁴³ Department for Environment Food and rural Affairs (2021) Statistics on waste managed by local authorities in England in 2020/21. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040756/Statistics_on_waste_managed_by_local_authorities_in_England_in_2020_v2rev_accessible.pdf [Date Accessed: 21/06/23]

⁴⁴ People per Dwelling has been calculated using the ONS mid-2021 population estimates (Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

B.10 SA Objective 9: Transport and accessibility

B.10.1 Introduction and context

B.10.1.1 **Boxes B.10.1 to B.10.6** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

B.10.1.2 The Local Plan should seek to ensure that residents in Dudley have access to a range of sustainable transport modes, to help facilitate a modal shift away from private car use to help tackle air quality and congestion issues and provide for more efficient travel. The Plan should also promote a reduced need to travel overall, facilitating local journeys via active travel wherever possible.

B.10.1.3 Accessibility modelling data⁴⁵ indicates the level of sustainable accessibility to local services (fresh food and centres) across Dudley and the wider Black Country.

B.10.2 Transport and accessibility receptors

Box B.10.1: SA Objective 9: Bus stop

Score	Likely Impact - Bus Stop
-	Development proposals are located over 400m from a bus stop.
+	Development proposals are located within 400m of a bus stop.

Notes
<p>It is desirable for site end users to be situated within walking distance of a bus stop.</p> <p>Bus stop data available from Transport for West Midlands⁴⁶.</p> <p>A target distance of 400m to a bus stop has been used in line with Barton <i>et al.</i> sustainable distances⁴⁷.</p>

Box B.10.2: SA Objective 9: Rail and metro

Score	Likely Impact - Railway or Metro Station
-	Development proposals are located over 2km from a railway or metro station.
+	Development proposals are located within 2km of a railway or metro station.

⁴⁵ Unpublished data provided to Lepus by the Council

⁴⁶ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 21/06/23]

⁴⁷ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Notes
Railway station data available from Transport for West Midlands. A target distance of 2km to a railway station has been used in line with Barton <i>et al.</i> sustainable distances ⁴⁸ . It is acknowledged that there are new metro stations under construction along the Wednesbury – Brierley Hill route which are not captured within this data. Any subsequent updates to the data can be incorporated into the SA assessments at a later stage.

Box B.10.3: SA Objective 9: Pedestrian access

Score	Likely Impact - Pedestrian Access
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.

Notes
New development sites have been assessed in terms of their access to the surrounding footpath network, allowing for safe local travel on foot. Safe access is determined to be that which is suitable for wheelchair users and pushchairs. Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps ⁴⁹ .

Box B.10.4: SA Objective 9: Road access

Score	Likely Impact - Road Access
-	Development proposals located in areas which currently have poor access to the surrounding road network.
+	Development proposals which are adjacent to an existing road.

Notes
Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps ⁵⁰ .

Box B.10.5: SA Objective 9: Pedestrian access to local services

Score	Likely Impact - Pedestrian Access to Local Services
-	Development proposals are located over a 15-minute walk to local services.
+	Development proposals are located over a 10-minute walk but within a 15-minute walk to local services.

⁴⁸ Ibid

⁴⁹ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

⁵⁰ Ibid

Score	Likely Impact - Pedestrian Access to Local Services
++	Development proposals are located within a 10-minute walk to local services.
Notes	
Data on fresh food centre locations and accessibility modelling (travel time to fresh food and centres) has been provided by DMBC.	

Box B.10.6: SA Objective 9: Public transport access to local services

Score	Likely Impact - Public Transport Access to Local Services
-	Development proposals are located over a 15-minute travel time via public transport to local services.
+	Development proposals are located over a 10-minute travel time but within a 15-minute travel time via public transport to local services.
++	Development proposals are located within a 10-minute travel time via public transport to local services.
Notes	
Data on fresh food centre locations and accessibility modelling (travel time to fresh food centres) has been provided by DMBC.	

B.11 SA Objective 10: Housing

B.11.1 Introduction and context

B.11.1.1 **Box B.11.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

B.11.1.2 When striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions and community stability⁵¹.

B.11.2 Housing receptors

Box B.11.1: SA Objective 10: Housing provision

Score	Likely Impact - Provision of Housing
--	Development proposals which result in a significant net decrease in housing (of 100 dwellings or more).
-	Development proposals which result in a minor net decrease in housing (of between one and 99 dwellings).
0	Development proposals would not impact housing provision.
+/-	It is uncertain whether the proposed development would result in a net change in housing provision. Residential-led development sites for which the net housing capacity was unknown at the time of writing.
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).

Notes

Estimated housing capacity for each reasonable alternative site has been provided by DMBC.

At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

⁵¹ Dempsey. N., Brown. C. and Bramley. G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. Progress in Planning 77:89-141

B.12 SA Objective 11: Equality

B.12.1 Introduction and context

B.12.1.1 **Box B.12.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

B.12.1.2 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. According to the IMD (2019)⁵², Dudley ranks as 104th out of 317 local authorities in England (with 1 being most deprived and 317 being least deprived). 21 of the LSOAs in Dudley are ranked among the 10% most deprived in England.

B.12.2 Equality receptors

Box B.12.1: SA Objective 11: IMD

Score	Likely Impact - Index of Multiple Deprivation
-	Development proposals within most deprived 10 percent LSOAs in England. Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.
0	Development proposals outside most deprived 10 percent LSOAs in England. Development proposals would be expected to have no significant impact on equality.
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.

Notes

UK Indices of Multiple Deprivation (IMD) available from MHCLG⁵³.

It should be noted that there is a degree of uncertainty in regard to the impacts of each site on deprivation and equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

⁵² Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 02/05/23]

⁵³ Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714> [Date accessed: 21/06/23]

B.13 SA Objective 12: Health

B.13.1 Introduction and context

- B.13.1.1 **Boxes B.13.1 to B.13.5** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.
- B.13.1.2 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRoW network.
- B.13.1.3 Accessibility modelling data⁵⁴ indicates the level of sustainable accessibility to healthcare (GP surgeries) across Dudley and the wider Black Country.
- B.13.1.4 It should be noted that healthcare capacity information has not been available; the assessment is based on accessibility alone.

B.13.2 Health receptors

Box B.13.1: SA Objective 12: NHS hospital

Score	Likely Impact - NHS Hospital
-	Development proposals located over 5km from an NHS hospital providing an A&E service.
+	Development proposals located over 5km from an NHS hospital providing an A&E service.

Notes
<p>For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of sites to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. NHS hospital department data available from the NHS website⁵⁵, and local hospital data provided by DMBC.</p> <p>The target distance of 5km to an NHS hospital with an A&E service has been used in line with Barton <i>et al.</i> sustainable distances⁵⁶.</p>

Box B.13.2: SA Objective 12: Pedestrian access to GP surgery

Score	Likely Impact - Pedestrian Access to GP Surgery
-	Development proposals are located over a 15-minute walk to a healthcare location.
+	Development proposals are located over a 10-minute walk but within a 15-minute walk to a healthcare location.

⁵⁴ Unpublished data provided to Lepus by the Council

⁵⁵ NHS (2023) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 20/06/23]

⁵⁶ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Score	Likely Impact - Pedestrian Access to GP Surgery
++	Development proposals are located within a 10-minute walk to a healthcare location.
Notes	
Data for healthcare locations and accessibility modelling (travel time to healthcare) has been provided by DMBC.	

Box B.13.3: SA Objective 12: Public transport access to GP surgery

Score	Likely Impact - Public Transport Access to GP Surgery
-	Development proposals are located over a 15-minute travel time via public transport to a healthcare location.
+	Development proposals are located over a 10-minute travel time but within a 15-minute travel time via public transport to a healthcare location.
++	Development proposals are located within a 10-minute travel time via public transport to a healthcare location.
Notes	
Data for healthcare locations and accessibility modelling (travel time to healthcare) has been provided by DMBC.	

Box B.13.4: SA Objective 12: Access to / net loss of greenspace

Score	Likely Impact - Access to / Net Loss of Greenspace
-	Development proposals which coincide with greenspace. Development proposals located over 600m from greenspace.
0	Development proposals do not coincide with greenspace.
+	Development proposals located within 600m of a greenspace.
Notes	
<p>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. The assessment of proximity to/net loss of greenspaces is based on Ordnance Survey Open Greenspaces⁵⁷. It is assumed that these greenspaces are publicly accessible.</p> <p>The target distance of 600m to a public greenspace has been used in line with Barton <i>et al.</i> sustainable distances⁵⁸.</p>	

Box B.13.5: SA Objective 12: Access to PRoW / cycle routes

Score	Likely Impact - Access to PRoW / Cycle Routes
-	Development proposals which are located over 600m from a PRoW and cycle route.

⁵⁷ Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 20/06/23]

⁵⁸ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Score	Likely Impact - Access to PRow / Cycle Routes
+	Development proposals which are located within 600m from a PRow and/or cycle route.
Notes	
New development sites have been assessed in terms of their access to the local PRow and cycle networks. PRow data provided by DMBC, and strategic cycle route data is available from Transport for West Midlands ⁵⁹ . The target distance of 600m to a footpath or cycle path has been used in line with Barton <i>et al.</i> sustainable distances.	

⁵⁹ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 20/06/23]

B.14 SA Objective 13: Economy

B.14.1 Introduction and context

B.14.1.1 **Boxes B.14.1 to B.14.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

B.14.1.2 Accessibility modelling data⁶⁰ indicates the level of sustainable accessibility to employment locations across Dudley and the wider Black Country. It is assumed that the mapped employment locations would provide a range of job opportunities for residents.

B.14.2 Economy receptors

Box B.14.1: SA Objective 13: Pedestrian access to employment opportunities

Score	Likely Impact - Pedestrian Access to Employment Opportunities
-	Residential development proposals are located over a 30-minute walk to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals are located over a 20-minute walk but within a 30-minute walk to a key employment location.
++	Residential development proposals are located within a 20-minute walk to a key employment location.
Notes	
Data for key employment locations and accessibility modelling (travel time to employment) has been provided by DMBC.	

Box B.14.2: SA Objective 13: Public transport access to employment opportunities

Score	Likely Impact - Public Transport Access to Employment Opportunities
-	Residential development proposals are located over a 30-minute travel time via public transport to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals are located over a 10-minute travel time but within a 30-minute travel time via public transport to a key employment location.
++	Residential development proposals are located within a 20-minute travel time via public transport to a key employment location.
Notes	
Data for key employment locations and accessibility modelling (travel time to employment) has been provided by DMBC.	

⁶⁰ Unpublished data provided to Lepus by the Council

Box B.14.3: SA Objective 13: Employment floorspace

Score	Likely Impact - Employment Floorspace
--	Development proposals which result in a significant net decrease in employment floorspace.
-	Development proposals which result in a minor net decrease in employment floorspace.
0	Development proposals would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.
+	Development proposals which result in a minor net increase in employment floorspace.
++	Development proposals which result in a significant net increase in employment floorspace.

Notes
An assessment of current land use has been made through reference to aerial photography and the use of Google Maps ⁶¹ .

⁶¹ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

B.15 SA Objective 14: Education, skills and training

B.15.1 Introduction and context

B.15.1.1 **Boxes B.15.1 to B.15.3** set out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

B.15.1.2 It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents. Accessibility modelling data⁶² indicates the level of sustainable accessibility to schools across Dudley and the wider Black Country.

B.15.1.3 It should be noted that school capacity information has not been available; the assessment is based on accessibility alone.

B.15.2 Education receptors

Box B.15.1: SA Objective 14: Pedestrian access to primary school

Score	Likely Impact - Pedestrian Access to Primary School
-	Residential development proposals are located over a 15-minute walk to a primary school.
0	Development proposals for non-residential use.
+	Residential development proposals are located over a 10-minute walk but within a 15-minute walk to a primary school.
++	Residential development proposals are located within a 10-minute walk to a primary school.

Notes

Data for primary school locations and accessibility modelling (travel time to primary schools) has been provided by DMBC.

Box B.15.2: SA Objective 14: Pedestrian access to secondary school

Score	Likely Impact - Pedestrian Access to Secondary School
-	Residential development proposals are located over a 25-minute walk to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals are located over a 20-minute walk but within a 25-minute walk to a secondary school.
++	Residential development proposals are located within a 20-minute walk to a secondary school.

⁶² Unpublished data provided to Lepus by the Council

Notes

Data for secondary school locations and accessibility modelling (travel time to secondary schools) has been provided by DMBC.

Box B.15.3: SA Objective 14: Public transport access to secondary school

Score	Likely Impact - Public Transport Access to Secondary School
-	Residential development proposals are located over a 25-minute travel time via public transport to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals are located over a 20-minute travel time but within a 25-minute travel time via public transport to a secondary school.
++	Residential development proposals are located within a 20-minute travel time via public transport to a secondary school.

Notes

Data for secondary school locations and accessibility modelling (travel time to secondary schools) has been provided by DMBC.

Appendix C: Reasonable Alternative Site Assessments

Appendix C Contents

C.1	Introduction	C1
C.2	SA Objective 1: Cultural Heritage	C11
C.3	SA Objective 2: Landscape	C19
C.4	SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity	C25
C.5	SA Objective 4: Climate Change Mitigation.....	C34
C.6	SA Objective 5: Climate Change Adaptation	C40
C.7	SA Objective 6: Natural Resources.....	C47
C.8	SA Objective 7: Pollution.....	C53
C.9	SA Objective 8: Waste	C60
C.10	SA Objective 9: Transport and Accessibility	C66
C.11	SA Objective 10: Housing.....	C73
C.12	SA Objective 11: Equality	C79
C.13	SA Objective 12: Health	C85
C.14	SA Objective 13: Economy	C93
C.15	SA Objective 14: Education, Skills and Training.....	C101

Tables

Table C.1.1:	Reasonable alternative sites in Dudley identified by DMBC.....	C6
Table C.2.1:	Sites impact matrix for SA Objective 1 – Dudley Reasonable Alternative Sites	C14
Table C.3.1:	Site impact matrix for SA Objective 2 – Dudley Reasonable Alternative Sites.....	C19
Table C.4.1:	Sites impact matrix for SA Objective 3 – Dudley Reasonable Alternative Sites	C28
Table C.5.1:	Sites impact matrix for SA Objective 4 – Dudley Reasonable Alternative Sites	C35
Table C.6.1:	Sites impact matrix for SA Objective 5 – Dudley Reasonable Alternative Sites	C42
Table C.7.1:	Sites impact matrix for SA Objective 6 – Dudley Reasonable Alternative Sites	C48
Table C.8.1:	Sites impact matrix for SA Objective 7 – Dudley Reasonable Alternative Sites	C55
Table C.9.1:	Sites impact matrix for SA Objective 8 – Dudley Reasonable Alternative Sites	C61
Table C.10.1:	Sites impact matrix for SA Objective 9 – Dudley Reasonable Alternative Sites	C68
Table C.11.1:	Sites impact matrix for SA Objective 9 – Dudley Reasonable Alternative Sites	C74
Table C.12.1:	Sites impact matrix for SA Objective 11 – Dudley Reasonable Alternative Sites	C80
Table C.13.1:	Sites impact matrix for SA Objective 12 – Dudley Reasonable Alternative Sites	C87
Table C.14.1:	Sites impact matrix for SA Objective 13 – Dudley Reasonable Alternative Sites	C95
Table C.15.1:	Sites impact matrix for SA Objective 14 – Dudley Reasonable Alternative Sites	C103

Figures

Figure C.1.1: Reasonable alternative sites proposed for Gypsy, Traveller and Travelling Showpeople use in Dudley..... C2
Figure C.1.2: Reasonable alternative sites proposed for employment use in Dudley C3
Figure C.1.3: Reasonable alternative sites proposed for residential use in Dudley C4
Figure C.1.4: Reasonable alternative sites proposed for mixed uses in Dudley C5

C.1 Introduction

C.1.1 Overview

- C.1.1.1 A total of 211 reasonable alternative sites have been identified within Dudley (see **Table C.1.1**). This includes 138 sites proposed for residential use, 21 sites proposed for Gypsy, Traveller and Travelling Showpeople (GTTS) use, 34 sites proposed for employment use and 18 sites proposed for mixed-use (of which four are non-residential mixed uses, and 14 include some residential development). The location of these sites is shown on **Figures C.1.1 to C.1.4**.
- C.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables C.2.1 – C.15.1** within each SA Objective chapter, in accordance with the methodology set out in **Chapter 2** of the main SA Report and the topic-specific methodology as set out in **Appendix B**.
- C.1.1.3 This Regulation 18 SA Report has considered all reasonable alternative sites in the same way using the SA Framework, irrespective of their size or location. At this stage, the assessment has been carried out using red line boundary and site proposal information provided by DMBC, as set out in **Table C.1.1**.
- C.1.1.4 The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation. The potential mitigating influence of the draft DLP policies is considered within **section 7.3** of the **Main R18 SA Report**.
- C.1.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by DMBC, as well as expert judgement.

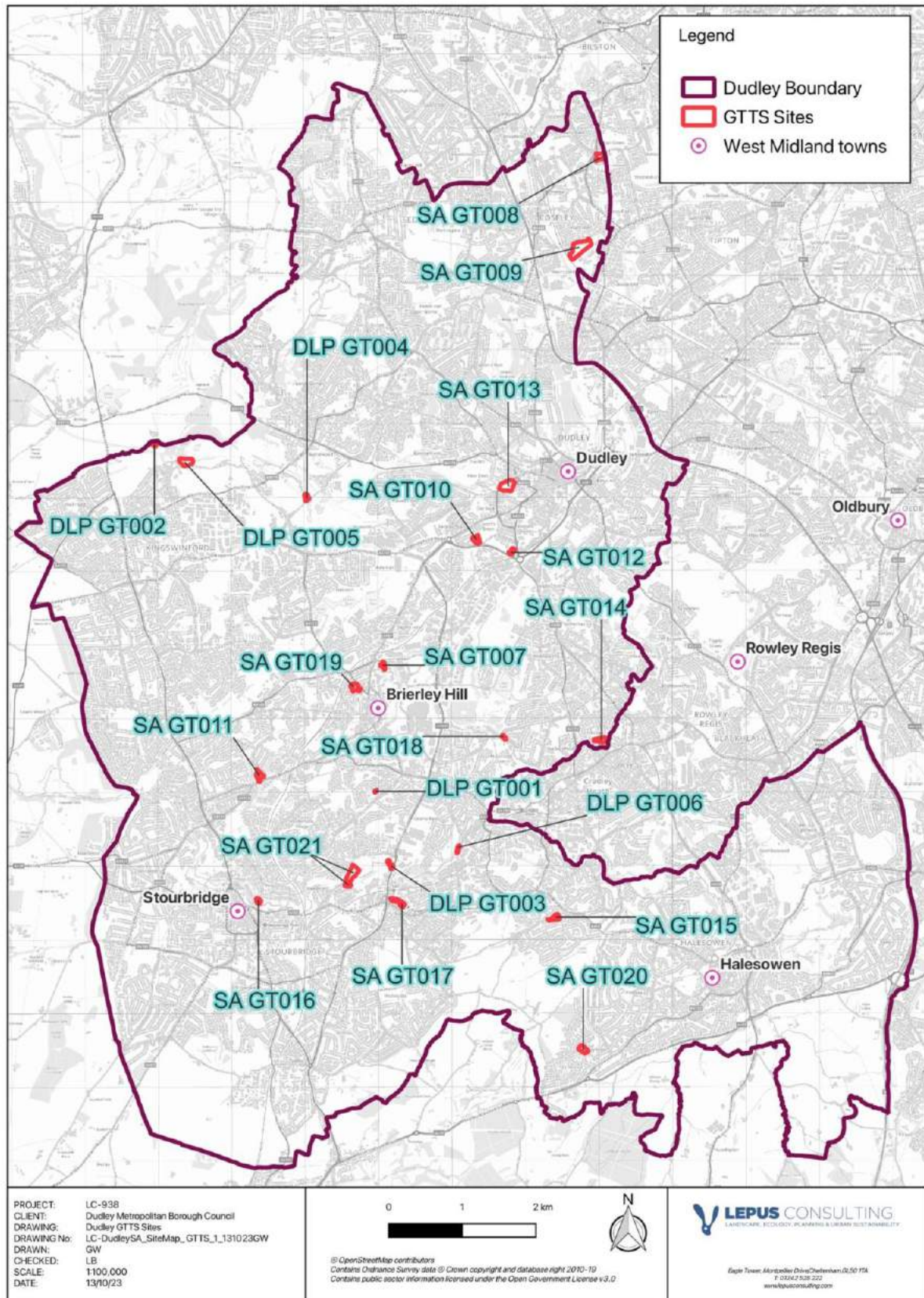


Figure C.1.1: Reasonable alternative sites proposed for Gypsy, Traveller and Travelling Showpeople use in Dudley

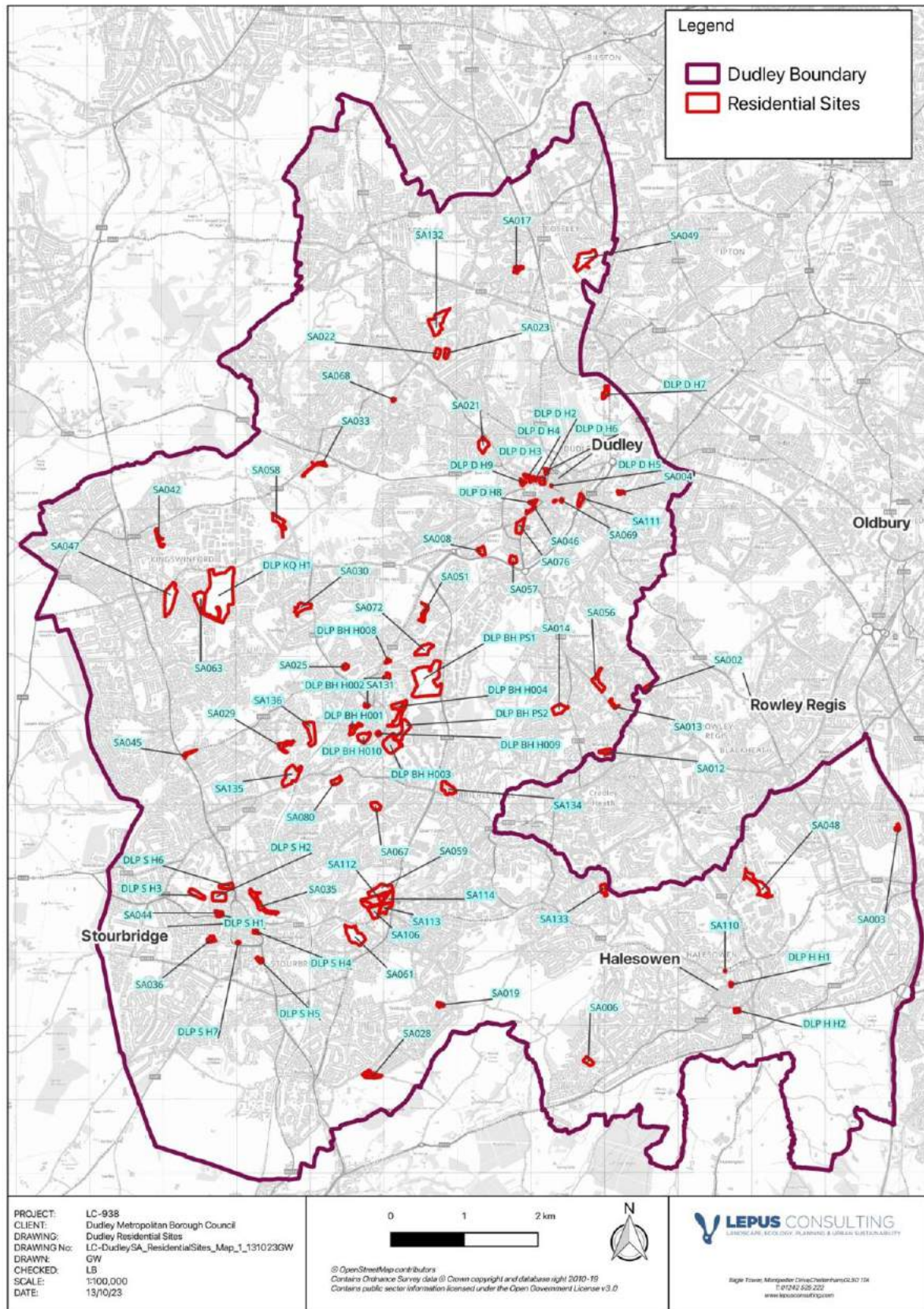


Figure C.1.3: Reasonable alternative sites proposed for residential use in Dudley

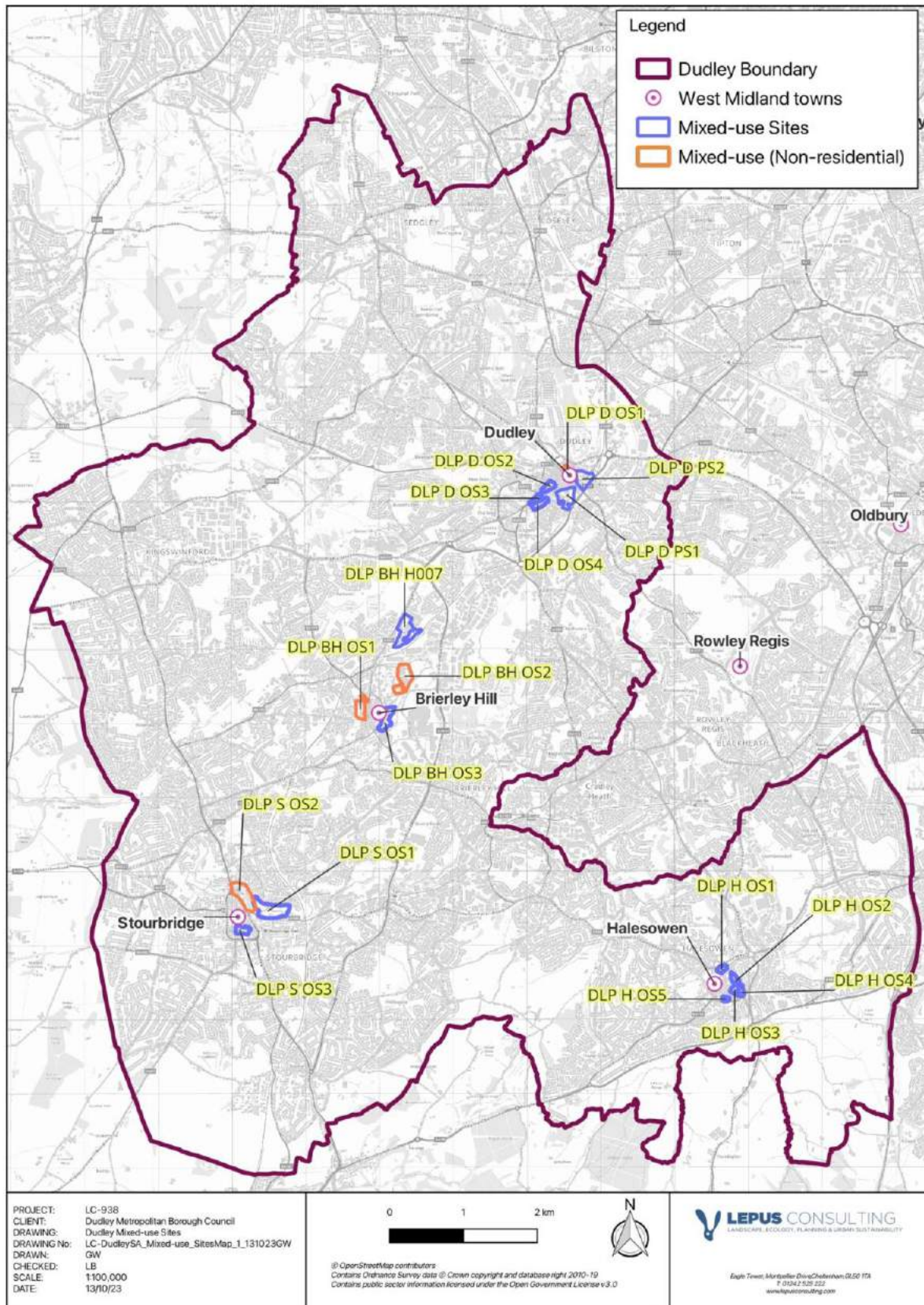


Figure C.1.4: Reasonable alternative sites proposed for mixed uses in Dudley

Table C.1.1: Reasonable alternative sites in Dudley identified by DMBC

Site Reference	Site Address	Gross Area (ha)	Net Area (ha)	Proposed Use	Housing Capacity
DLPBHH001	Land at Moor Street	3.09	2.32	Residential	60
DLPBHH002	Waterfront West	0.40	0.30	Residential	61
DLPBHH003	Canal Walk South (referred to as Mill Street)	3.70	2.78	Residential	250
DLPBHH004	Level Street/Old Bush Street	1.06	1.06	Residential	95
DLPBHH008	Car park at Oak Court, Dudley Road	0.37	0.37	Residential	24
DLPBHH009	Old Carriage Works, Mill Street	0.28	0.28	Residential	28
DLPBHH010	Land at Bell Street and High Street	1.50	1.50	Residential	120
DLPBHPS1	Land at Waterfront Way and Level Street	7.60	5.70	Residential	600
DLPBHPS2	The Embankment / Daniels Land	2.88	2.16	Residential	300
DLPDH2/DLPDH3/DLPDH4	Wolverhampton St	0.75	0.75	Residential	76
DLPDH1	Regent House	0.08	0.08	Residential	18
DLPDH5	200a Wolverhampton St	0.04	0.04	Residential	22
DLPDH6	Ednam House, 1 Ednam Road	0.38	0.38	Residential	13
DLPDH7	Tipton Road- Land adjacent to Black Country Museum	0.97	0.97	Residential	35
DLPDH8	Gypsies Tent Public House	0.48	0.48	Residential	25
DLPDH9	Former Appleyards Site, Wolverhampton Street	0.38	0.38	Residential	18
DLPHH1	Will Thorne House	0.18	0.18	Residential	20
DLPHH2	Halesowen Police Station	0.33	0.33	Residential	30
DLPSH1	Enville Street, Stourbridge	0.30	0.30	Residential	23
DLPSH2	Bradley Road (East), Stourbridge	1.94	1.94	Residential	46
DLPSH3	Bradley Road (west)	0.53	0.53	Residential	24
DLPSH4	64-67 High Street, Stourbridge	0.45	0.45	Residential	40
DLPSH5	Peugeot Garage, Hagley Road	0.48	0.48	Residential	35
DLPSH6	Titan Works, Old Wharf	1.05	1.05	Residential	26
DLPSH7	36 to 42 Market Street	0.14	0.14	Residential	10
DLPH001	Cookley Works, Leys Road, Brockmoor, Brierley Hill	2.16	1.62	Residential	70
DLPH002	Land at Old Wharf Road, Stourbridge	7.02	4.20	Residential	230
DLPH003	Long Lane/Maltmill Lane, Shell Corner	0.36	0.36	Residential	13
DLPH004	Caledonia Sewage Works	6.24	3.97	Residential	140
DLPH005	Clinic Drive Lye	0.90	0.68	Residential	71
DLPH006	Land off Ruiton St/ Colwall Rd Gornal	0.46	0.46	Residential	19
DLPH007	Bourne Street, Coseley	2.57	2.57	Residential	72
DLPH008	Land adj. To 49 Highfields Road	0.40	0.40	Residential	13
DLPH009	Springfield Works, Pearson Street, Lye	0.25	0.25	Residential	11
DLPH010	Land at Plant Street, Mill Street and Bridge Street, Wordsley	1.29	0.97	Residential	43
DLPH011	Leys Road/Moor Street, Brierley Hill	2.60	1.95	Residential	78
DLPH012	Quantum Works, Enville Street, Stourbridge	0.36	0.36	Residential	14
DLPH013	Balds Lane, Lye	2.60	1.95	Residential	89
DLPH014	Rufford Road, Stourbridge	0.41	0.41	Residential	16
DLPH015/DLPH026	Lyde Green	1.19	1.19	Residential	49
DLPH016	Land at corner of Saltwells Road and Halesowen Road, Netherton	1.40	1.40	Residential	63
DLPH017	Land off Thorns Road, Lye (North)	3.42	2.61	Residential	184
DLPH018	Bull Street, Dudley	2.06	2.06	Residential	80
DLPH019	St Marks House, Brook Street	0.29	0.29	Residential	13
DLPH020	Shaw Road/New Road, Dudley	0.39	0.39	Residential	16
DLPH021	The Straits/Majors Fold, Lower Gornal	0.64	0.64	Residential	23
DLPH022	Ridge Hill	4.16	4.16	Residential	129

Site Reference	Site Address	Gross Area (ha)	Net Area (ha)	Proposed Use	Housing Capacity
DLPH023	Industrial land at Marriott Road and Cradley Road	3.34	2.50	Residential	41
DLPH024	Hays Lane, Stour Vale Road	1.45	1.09	Residential	58
DLPH025	Land at Blowers Green Road, Dudley	1.88	1.41	Residential	63
DLPH027	Former Factory Site, Park Lane, Cradley	3.60	2.00	Residential	80
DLPH028	Former MEB Headquarters, Mucklow Hill	1.50	1.50	Residential	60
DLPH029	Foredraft Street, Cradley (2 sites A and B)	0.53	0.53	Residential	18
DLPH030	Former Istock Works	7.60	7.60	Residential	200
DLPH031	Land at Birmingham New Road	26.40	26.40	Residential	500
DLPH032	Old Dock, Vauxhall Street/Cleavelnd Street	3.30	3.30	Residential	111
DLPH033	North Street Industrial Estate	1.58	1.58	Residential	63
DLPH034	Marriott Road	14.44	2.60	Residential	105
DLPH035	VB Old Wharf Road	1.40	1.05	Residential	36
DLPH036	Brockmoor Foundry North	1.90	1.90	Residential	60
DLPH037	Land between Heath Road and Copse Road, Netherton	0.76	0.57	Residential	27
DLPH038	Land rear of Salcombe Grove, Coseley	1.10	0.80	Residential	44
DLPH039	Land rear of Two Gates Lane, Cradley	0.68	0.51	Residential	24
DLPH040	Land adjacent 32 Whitegates Road, Coseley	0.25	0.25	Residential	10
DLPH041	Hampshire House, 434 High Street, Kingswinford	0.44	0.44	Residential	30
DLPH042	Land rear of 294 to 364 Stourbridge Road, Halesowen	1.34	1.00	Residential	45
DLPH043	Land at Corporation Road and Cavell Road, Dudley	0.42	0.42	Residential	20
DLPH044	Land adjacent to Pear Tree Lane, Coseley	0.99	0.74	Residential	38
DLPH045	St Peter's Road, Netherton	0.85	0.85	Residential	22
DLPH046	Former New Hawne Colliery, Haysech Road, Halesowen	0.63	0.63	Residential	15
DLPH047	Baptist End Road	1.45	1.09	Residential	49
DLPH048	Sandvik, Halesowen	2.32	1.50	Residential	50
DLPH049	Site at Wellington Road and Dock Lane	2.20	1.65	Residential	130
DLPH050	National Works, Hall Street, Dudley	5.00	3.75	Residential	150
DLPH051	Land adjacent to Nuttalls	0.80	0.80	Residential	36
DLPH052	Derelict Building opposite 206-218 Moor Street, Brierley Hill	0.26	0.26	Residential	30
DLPH053	Land off Lower Valley Road, Wordsley	0.40	0.40	Residential	17
DLPH054	Former Recycling Centre, Moor Street	0.81	0.81	Residential	80
DLPH055	Vacant land at Darkhouse Lane	0.63	0.63	Residential	13
DLPH056	Fiddlers Arms, 16 Straits Road	0.27	0.27	Residential	9
DLPH057	Pens Meadow School, Ridge Hill	1.01	0.76	Residential	30
DLPH058	Land at Norton Crescent	0.56	0.56	Residential	12
DLPH059	Land at Highfields Road, Coseley	0.49	0.35	Residential	12
DLPH060	Holloway Street West, Gornal	0.61	0.61	Residential	24
DLPH061	Church Road, Netherton	0.88	0.66	Residential	29
DLPH062	Saltwells Education Development Centre, Bowling Green Road, Netherton, Dudley	1.40	1.10	Residential	50
DLPKQH1	Ketley Quarry, Dudley Road, Kingswinford	21.37	14.90	Residential	600
SA002	Brooksbank Drive Open Space	0.76	0.76	Residential	31
SA003-H	High Farm Road, Halesowen	0.37	0.37	Residential	15
SA004	Alton Grove, Dudley, DY2 7JU	0.32	0.32	Residential	13
SA006	Merrick Close Playing Fields	0.89	0.89	Residential	36
SA008	Waverley Open Space	0.83	0.83	Residential	32
SA012	Bristol Road, Dudley, DY2 9SE	0.84	0.84	Residential	34
SA013	Magpie Close, Dudley, DY2 9LU	0.41	0.41	Residential	16
SA014	Playing Field off Cradley Road Netherton	1.74	1.74	Residential	70
SA017	Wellesbourne Drive, Coseley, WV14 9TH	0.54	0.54	Residential	14

Site Reference	Site Address	Gross Area (ha)	Net Area (ha)	Proposed Use	Housing Capacity
SA019	Sensal Road Bank	0.44	0.44	Residential	18
SA021	Shavers End Open Space	1.80	1.80	Residential	160
SA022	Bramble Green, Dudley, DY1 3TR	0.77	0.77	Residential	31
SA023	Hazlewood Road, DY1 3TL	0.63	0.63	Residential	25
SA025	Orchard Street Island	0.42	0.42	Residential	17
SA028	Dobbins Oak Flats	1.14	1.14	Residential	46
SA029	Hawbush Road Open Space	1.25	1.25	Residential	50
SA030	Mullett Park	1.70	1.70	Residential	60
SA033	The Spinney, Brierley Hill, DY3 2RD	0.74	0.74	Residential	30
SA035	Porlock Road/ Mill Race Lane	2.19	2.19	Residential	84
SA036-H	Land off Bowling Green Road Stourbridge, DY8 3XF	0.62	0.62	Residential	25
SA042	Balfour Road Kingswinford, DY6 7DJ	0.75	0.75	Residential	30
SA045	High Street Wordsley/Brierley Hill Road	0.42	0.42	Residential	17
SA046	Greystone Street, Dudley, DY1 1SH	0.44	0.44	Residential	18
SA047-H	Kingswinford Youth Centre, High Street, Kingswinford	4.68	4.68	Residential	188
SA048	Land off Coombs Road	3.34	3.34	Residential	144
SA049	Central Drive Open Space/ Budden Road	4.00	4.00	Residential	160
SA051	Fullwood Crescent, Dudley, DY2 0SQ	0.93	0.93	Residential	36
SA056	Halesowen Open Space	1.99	1.99	Residential	52
SA057	Blower Greens Crescent	0.97	0.97	Residential	35
SA058	Dreadnought Road	2.50	2.50	Residential	96
SA059-H	Bott Lane, Lye	2.13	2.13	Residential	82
SA061	Lewis Rd, Lye	4.14	1.40	Residential	40
SA063	Standhills Open Space	3.93	3.93	Residential	48
SA067	Land Off Delph Lane, Brierley Hill (H11B.7) Dudley Borough Development Strategy)	1.28	1.28	Residential	51
SA068	Deepdale Works, Upper Gornal	0.83	0.83	Residential	33
SA069	Site at King Street, Dudley	0.62	0.62	Residential	25
SA072-H	Canal Walk North (Brierley Hill Area Action Plan Allocation W7 and W8)	1.62	1.62	Residential	65
SA076	Blowers Green Road, Dudley, DY8 8UT	1.59	1.59	Residential	64
SA080	Land at Anchor Hill, Delph Road	0.88	0.66	Residential	28
SA106	Land off Engine Lane, Lye (south of railway)	1.70	1.70	Residential	68
SA110	7 New Road Halesowen	0.05	0.05	Residential	10
SA111	Cousins Dudley	0.75	0.75	Residential	44
SA112	West of Engine Lane, north of the railway, Lye	6.00	4.25	Residential	168
SA113	East of Engine Lane, south of the railway, Lye	1.25	0.93	Residential	35
SA114	Bott Lane/Dudley Road, Lye	1.25	1.25	Residential	43
SA131	Police Headquarters, Bank Street, Brierley Hill	0.25	0.25	Residential	46
SA132	Eve Lane (to be added)	3.96	2.4	Residential	96
SA133	Stourvale Trading Estate, Banners Lane, Cradley	0.93	0.93	Residential	215
SA134	Oak Street Trading Estate	2.1	1.57	Residential	84
SA135	Land North of Brettell Lane	3.00	1.85	Residential	160
SA136	Moor Street Albion Works	2.82	2.82	Residential	112
DLPE01	Fountain Lane	1.94	0.00	Employment	N/A
DLPE02	Moor Street, Freight Depot	2.02	0.00	Employment	N/A
DLPE03	Tansey Green Road, Pensnett	1.66	0.00	Employment	N/A
DLPE04	Hillcrest Business Park, New Road, Dudley	0.42	0.00	Employment	N/A
DLPE05	Narrowboat Way, Blackbrook Valley	1.43	0.00	Employment	N/A
DLPE06	Steelpark Road, Halesowen	0.44	0.44	Employment	N/A

Site Reference	Site Address	Gross Area (ha)	Net Area (ha)	Proposed Use	Housing Capacity
DLPE07	Bean Road, Coseley	2.16	1.21	Employment	N/A
DLPE08	Westminster Industrial Estate, Cradley Road, Netherton	0.44	0.44	Employment	N/A
DLPE09	Land off Amber Way, Coombeswood Industrial Park	0.45	0.45	Employment	N/A
DLPE10	Land adjacent to railway, Pedmore Road (Blackbrook Salvage)	0.93	0.93	Employment	N/A
DLPE11	Hardstanding area to south, Silver End Trading Estate	0.43	0.43	Employment	N/A
DLPE12	Land off Timmis Road, Lye	0.59	0.59	Employment	N/A
DLPE13	Coopers Bank Road, Gornal	0.67	0.67	Employment	N/A
SA003-E	High Farm Road, Halesowen	0.37	0.37	Employment	N/A
SA036-E	Land off Bowling Green Road Stourbridge, DY8 3XF	0.62	0.62	Employment	N/A
SA044	Enville Street, Stourbridge	0.3	0.3	Employment	N/A
SA047-E	Kingswinford Youth Centre, High Street, Kingswinford	4.68	4.68	Employment	N/A
SA059-E	Bott Lane, Lye	2.13	2.13	Employment	N/A
SA070	Former Filmex Ltd, rear of Park Lane Tavern, Park Lane (within the Hayes LEA)	0.41	0.41	Employment	N/A
SA072-E	Canal Walk North (Brierley Hill Area Action Plan Allocation W7 and W8)	1.62	1.62	Employment	N/A
SA078	Oak Street Trading Estate	2.10	1.57	Employment	N/A
SA079	Jews Lane	0.47	0.47	Employment	N/A
SA081	Vacant Land rear of 2-26 Blowers Green Crescent	0.55	0.41	Employment	N/A
SA082	Griff Chains, Quarry Road, Netherton	1.82	1.37	Employment	N/A
SA083	Deepdale Lane, Upper Gornal	4.65	3.55	Employment	N/A
SA084	Land South of King William Street, Amblecote	1.52	1.52	Employment	N/A
SA085	Platts Road, Amblecote	1.44	1.30	Employment	N/A
SA086	Land South of Brettell Lane, Brierley Hill	2.10	1.58	Employment	N/A
SA087	Old Dock-Queens Cross/Wellington Road/Waterloo Street, Dudley	4.03	1.40	Employment	N/A
SA088	South of Northfield Road, Netherton	0.62	0.62	Employment	N/A
SA089	Prospect Row	1.50	1.50	Employment	N/A
SA090	Land off Lodgefield Road, Halesowen	1.90	1.43	Employment	N/A
SA091	Shaw Road, Dudley	9.01	6.75	Employment	N/A
SA092	Land North of Brettell Lane	3.00	1.85	Employment	N/A
DLPBHOS1	Brierley Hill Civic Core	3.29	3.29	Mixed-use (Non-residential)	N/A
DLPBHOS2	The Waterfront East Entertainment Zone	6.14	6.14	Mixed-use (Non-residential)	N/A
DLPBHOS3	The Venture Way Health Education Zone	22.94	22.94	Mixed-use	0
DLPDOS1	Tower Street/Castle Street	0.60	0.60	Mixed-use (Non-residential)	0
DLPDOS2	Trident Centre/Upper High Street	1.00	1.00	Mixed-use	60
DLPDOS3	Upper High Street/King Street	0.73	0.73	Mixed-use	40
DLPDOS4	Abberley Street/King Street	1.20	1.20	Mixed-use	50
DLPDPS1	King Street/Flood Street	4.70	4.70	Mixed-use	120
DLPDPS2	Trindle Road/Hall Street/Birdcage Walk	4.40	4.40	Mixed-use	280
DLPHOS1	Trinity Point	0.50	0.50	Mixed-use	87
DLPHOS2	Link House and Pioneer House, Halesowen	0.64	0.64	Mixed-use	20
DLPHOS3	Little Cornbow, Halesowen	0.79	0.79	Mixed-use	43
DLPHOS4	Fountain House, Halesowen	0.57	0.57	Mixed-use	60

Site Reference	Site Address	Gross Area (ha)	Net Area (ha)	Proposed Use	Housing Capacity
DLPHOS5	Pool Road Car Park	0.23	0.23	Mixed-use	30
DLPSOS1	North of Birmingham Street	3.08	3.08	Mixed-use	70
DLPSOS2	Mill Race Lane	7.05	7.05	Mixed-use (Non-residential)	0
DLPSOS3	Rye Market	1.11	1.11	Mixed-use	50
DLPH006/DLPH007	Harts Hill	7.37	7.37	Mixed-use	310
DLPGT001	Delph Lane	0.12	0.12	GTTS	4
DLPGT002	Holbeache Lane, Wall Heath	0.24	0.24	GTTS	4
DLPGT003	Dudley Road, Lye	0.23	0.23	GTTS	6
DLPGT004	Smithy Lane	0.45	0.45	GTTS	15
DLPGT005	Oak Lane	1.10	1.10	GTTS	22
DLPGT006	Saltbrook Scrapyard, Saltbrook Road, Halesowen	2.92	2.19	GTTS	2
SAGT007	Vacant Car Park, Waterfront Way, Brierley Hill (SHLAA site 366)	0.40	0.40	GTTS	N/A
SAGT008	Land at Higgins Avenue, Harding Street, Coseley	1.04	1.04	GTTS	N/A
SAGT009	Budden Road, Coseley (existing Transit Site)	3.92	3.92	GTTS	N/A
SAGT010	Waverley Street Open Space, Dudley	0.80	0.80	GTTS	N/A
SAGT011	Land rear and next to Oakfield Centre, Brierley Hill	1.33	1.33	GTTS	N/A
SAGT012	Blowers Green Road, Dudley	0.47	0.47	GTTS	N/A
SAGT013	Old Dudley Leisure Centre	2.20	2.20	GTTS	N/A
SAGT014	Bristol Road, Dudley	0.84	0.84	GTTS	N/A
SAGT015	Land rear of Two Gates Lane, Cradley	0.68	0.68	GTTS	N/A
SAGT016	Birmingham Street, Stourbridge	0.40	0.40	GTTS	N/A
SAGT017	Clinic Drive, Lye	0.91	0.91	GTTS	N/A
SAGT018	Saltwells Road, Netherton	0.21	0.21	GTTS	N/A
SAGT019	Bank Street Playing Field, Brierley Hill	0.97	0.97	GTTS	N/A
SAGT020	Merrick Close Playing Fields, Halesowen	0.90	0.90	GTTS	N/A
SAGT021	Land at Caledonia/Bagleys Road	2.50	2.50	GTTS	N/A

C.2 SA Objective 1: Cultural Heritage

C.2.1 Grade I Listed Buildings

C.2.1.1 There are six Grade I Listed Buildings within Dudley. Sites DLPSH5 and DLPSOS3 are in close proximity to 'Sir Thomas Church', located approximately 60m south and 60m east of the Listed Building, respectively. Sites DLPHH1 and DLPHOS1 are located approximately 85m east and 49m north, respectively, of 'St John the Baptist Church'. The proposed development at these four sites could potentially have a minor negative impact on the setting of Grade I Listed Buildings within Dudley.

C.2.1.2 Site DLPH048 is located 318m north of 'St Mary's Abbey Ruins, Manor Farm', however, the site is separated by 'Manor Way' (A456); therefore, the proposed development would not be expected to impact the heritage asset or its setting. Furthermore, sites DLPHOS2, DLPHOS3, DLPHOS4, and DLPHOS5 are separated by development from 'St John the Baptist Church' and would therefore not be expected to impact the heritage asset or its setting. Site DLPDOS1 is located 310m south of 'Dudley Castle', however, the site is separated by development and would not be expected to impact the heritage asset or its setting. No other sites are located within close proximity to Grade I Listed Buildings, and as such, all other sites would be likely to have a negligible impact for this receptor.

C.2.2 Grade II* Listed Buildings

C.2.2.1 There are 21 Grade II* Listed Buildings within Dudley, mostly concentrated in Dudley Town Centre and the other major settlements in the borough.

C.2.2.2 Site DLPH046 coincides with 'Fan House and Chimney at the former New Hawne Colliery'. Site DLPSH3 coincides with 'The Old Foundry'. The proposed development at these two sites could potentially have direct adverse effects on these Listed Buildings, resulting in a major negative impact.

C.2.2.3 13 sites are located in close proximity to Grade II* Listed Buildings, including Site DLPH010 which is adjacent to 'Buildings at Stuart Crystal Glassworks (White House Complex)'. The proposed development at these 13 sites could potentially have a minor negative impact on the setting of these Listed Buildings. The remaining sites are deemed unlikely to have a significant impact on the setting of any Grade II* Listed Building and have consequently been assessed as negligible.

C.2.3 Grade II Listed Buildings

C.2.3.1 There are 243 Grade II Listed Buildings throughout the borough, generally clustered within the built-up areas and particularly within Dudley and Stourbridge Town Centres. Six sites coincide with Grade II Listed Buildings. Site DLPH046 coincides with 'Winding Engine

House at the former Hawne Colliery’ and ‘The Office, Workshops and Stores Block at the former New Hawne Colliery’. Site DLPBHH001 coincides with ‘Technical Institute and Public Library, Brierley Hill’. Site DLPDH5 coincides with ‘Chief Post Office’. Site DLPD0S3 coincides with ‘83 and 83A High St’. Site SA092 and SA081 coincides with ‘Harris and Pearson Entrance Building’. The proposed development at these six sites could potentially have direct adverse effects on these Grade II Listed Buildings, resulting in a major negative impact.

C.2.3.2 Additionally, 28 sites could potentially have a minor negative impact on the setting of various Grade II Listed Buildings, for example Site DLPH0S1 is adjacent to ‘Ivy House’ and Site DLPDPS2 is adjacent to ‘Roman Catholic Church of Our Lady and St Thomas’.

C.2.3.3 The remaining sites are deemed unlikely to have a significant impact on the setting of any Grade II Listed Building and have consequently been assessed as negligible.

C.2.4 Conservation Area

C.2.4.1 Dudley contains 34 Conservation Areas (CA), the majority of which cover sections of the urban area, as well as portions of the canal network and historic open spaces. The proposed development at the majority of sites in Dudley would be unlikely to significantly impact any of these CAs, as the sites are separated from nearby CAs by existing built form. As such, negligible impacts are identified for the majority of sites.

C.2.4.2 However, 29 sites are located wholly or partially within one of these CAs, including Site DLPBHH001 and DLPBHH010 which are located wholly within ‘High Street, Brierley Hill’ CA, and Site DLPDH1 within ‘Dudley Town Centre’ CA. A further 16 sites are located adjacent or in close proximity to a CA. The proposed development at these 16 sites could potentially result in a minor negative impact on the character or setting of CAs in Dudley.

C.2.5 Scheduled Monument

C.2.5.1 There are 12 Scheduled Monuments (SMs) within Dudley, generally covering areas with little or no existing development, adjacent to the main settlements. Site DLPH010 is located adjacent to ‘Redhouse, Whitehouse and Newhouse Glassworks’ SM. Therefore, the proposed development at this site could potentially have a minor negative impact on the setting of the SM. The remaining sites are separated from nearby SMs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of SMs.

C.2.6 Registered Park and Garden

C.2.6.1 Two Registered Parks and Gardens (RPGs) can be found within Dudley: ‘Priory Park’ and ‘The Leasowes’. Other nearby RPGs include ‘Himley Hall’ and ‘Hagley Hall’ RPGs, which lie adjacent to the borough boundary to the north west and south respectively. Site DLPH028

is located adjacent to 'The Leasowes' and would be expected to have a minor negative impact on the setting of the RPG. All remaining sites are deemed unlikely to have a significant impact on the setting of any RPG, due to the distance and/or intervening development between the proposed sites and the RPGs, and have consequently been assessed as negligible.

C.2.7 Archaeological Priority Area

C.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Dudley's urban and undeveloped areas within the Black Country Historic Landscape Characterisation (HLC) Study¹. 41 sites in Dudley coincide wholly or partially with APAs, and a further 12 sites are located adjacent to APAs. This includes Site DLPH031 that coincides with 'Foxyards Canal' APA and Site DLPH046 located with 'Newham Colliery' APA. The proposed development at these 53 sites could potentially alter the setting of APAs, and as a result have a minor negative impact. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

C.2.8 Historic Landscape Characterisation

C.2.8.1 The Black Country HLC Study² has identified a range of Historic Environment Area Designations (HEADs) within the Black Country, covering Dudley's parkland and Green Belt as well as a number of features within the urban areas.

C.2.8.2 A total of 53 sites are located wholly or partially within an Area of High Historic Landscape Value (AHHLV) or High Historic Townscape Value (AHHTV), including Sites DLPS0S1 and DLPH004 coinciding entirely with the 'River Stour Corridor' AHHLV. Additionally, site DLPGT010 and SA008 are located wholly within 'Dudley Municipal Cemetery' Designed Landscape of High Historic Value (DLHV). Therefore, the proposed development at these 55 sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified HEADs, and therefore, would be expected to have a negligible impact on the local historic environment.

¹ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
[Date Accessed: 11/08/23]

² Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
[Date Accessed: 11/08/23]

Table C.2.1: Sites impact matrix for SA Objective 1 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
DLPBHH001	Residential	0	0	--	-	0	0	0	0
DLPBHH002	Residential	0	0	0	0	0	0	-	0
DLPBHH003	Residential	0	0	-	-	0	0	-	-
DLPBHH004	Residential	0	0	0	0	0	0	0	0
DLPBHH008	Residential	0	0	0	0	0	0	-	0
DLPBHH009	Residential	0	0	0	-	0	0	0	0
DLPBHH010	Residential	0	0	-	-	0	0	0	0
DLPBHPS1	Residential	0	0	0	0	0	0	0	0
DLPBHPS2	Residential	0	0	0	0	0	0	-	-
DLPDH2/DLPDH3/DLPDH4	Residential	0	-	-	-	0	0	0	0
DLPDH1	Residential	0	-	0	-	0	0	-	0
DLPDH5	Residential	0	-	--	-	0	0	0	0
DLPDH6	Residential	0	0	0	-	0	0	0	0
DLPDH7	Residential	0	0	0	0	0	0	0	0
DLPDH8	Residential	0	0	0	-	0	0	-	0
DLPDH9	Residential	0	0	0	0	0	0	0	0
DLPHH1	Residential	-	0	-	0	0	0	-	0
DLPHH2	Residential	0	0	0	0	0	0	0	-
DLPSH1	Residential	0	-	0	0	0	0	0	-
DLPSH2	Residential	0	0	-	-	0	0	-	0
DLPSH3	Residential	0	--	-	-	0	0	-	0
DLPSH4	Residential	0	0	0	-	0	0	0	-
DLPSH5	Residential	0	0	0	0	0	0	0	-
DLPSH6	Residential	0	0	-	-	0	0	0	0
DLPSH7	Residential	-	0	-	-	0	0	0	-
DLPH001	Residential	0	0	-	0	0	0	-	-
DLPH002	Residential	0	-	-	-	0	0	0	0
DLPH003	Residential	0	0	0	0	0	0	0	0
DLPH004	Residential	0	0	0	0	0	0	0	-
DLPH005	Residential	0	0	0	0	0	0	0	-
DLPH006	Residential	0	0	0	0	0	0	0	0
DLPH007	Residential	0	0	0	0	0	0	0	0
DLPH008	Residential	0	0	0	0	0	0	0	0
DLPH009	Residential	0	0	0	0	0	0	0	-
DLPH010	Residential	0	-	0	-	-	0	-	-
DLPH011	Residential	0	0	0	-	0	0	0	0
DLPH012	Residential	0	0	0	0	0	0	0	0
DLPH013	Residential	0	0	0	0	0	0	0	0
DLPH014	Residential	0	0	0	0	0	0	0	0
DLPH015/DLPH026	Residential	0	0	0	0	0	0	0	-
DLPH016	Residential	0	0	0	0	0	0	-	0
DLPH017	Residential	0	0	0	0	0	0	0	0

Site Reference	Site Use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
DLPH018	Residential	0	0	0	0	0	0	0	0
DLPH019	Residential	0	0	0	0	0	0	0	-
DLPH020	Residential	0	0	0	0	0	0	0	0
DLPH021	Residential	0	0	0	0	0	0	0	0
DLPH022	Residential	0	0	0	-	0	0	0	-
DLPH023	Residential	0	0	0	0	0	0	-	-
DLPH024	Residential	0	0	0	0	0	0	0	-
DLPH025	Residential	0	0	0	0	0	0	0	-
DLPH027	Residential	0	0	-	0	0	0	0	0
DLPH028	Residential	0	0	-	-	0	-	0	0
DLPH029	Residential	0	0	0	0	0	0	0	-
DLPH030	Residential	0	0	0	0	0	0	0	0
DLPH031	Residential	0	0	0	0	0	0	-	-
DLPH032	Residential	0	0	0	0	0	0	0	0
DLPH033	Residential	0	0	0	-	0	0	0	0
DLPH034	Residential	0	0	0	0	0	0	-	-
DLPH035	Residential	0	-	0	-	0	0	0	0
DLPH036	Residential	0	0	0	0	0	0	-	0
DLPH037	Residential	0	0	0	0	0	0	0	0
DLPH038	Residential	0	0	0	0	0	0	0	0
DLPH039	Residential	0	0	0	0	0	0	0	0
DLPH040	Residential	0	0	0	0	0	0	0	0
DLPH041	Residential	0	0	0	0	0	0	0	0
DLPH042	Residential	0	0	0	0	0	0	0	0
DLPH043	Residential	0	0	0	0	0	0	0	0
DLPH044	Residential	0	0	0	0	0	0	0	-
DLPH045	Residential	0	0	0	-	0	0	-	0
DLPH046	Residential	0	--	--	0	0	0	-	-
DLPH047	Residential	0	0	0	0	0	0	0	0
DLPH048	Residential	0	0	0	0	0	0	-	0
DLPH049	Residential	0	0	0	0	0	0	0	0
DLPH050	Residential	0	0	0	0	0	0	0	-
DLPH051	Residential	0	0	0	0	0	0	0	0
DLPH052	Residential	0	0	0	0	0	0	-	0
DLPH053	Residential	0	0	0	0	0	0	0	0
DLPH054	Residential	0	0	-	0	0	0	-	0
DLPH055	Residential	0	0	0	0	0	0	0	0
DLPH056	Residential	0	0	0	-	0	0	0	0
DLPH057	Residential	0	0	0	-	0	0	0	0
DLPH058	Residential	0	0	0	0	0	0	0	0
DLPH059	Residential	0	0	0	0	0	0	0	0
DLPH060	Residential	0	0	0	0	0	0	0	0
DLPH061	Residential	0	0	0	0	0	0	0	0
DLPH062	Residential	0	0	0	0	0	0	0	0

Site Reference	Site Use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
DLPKQH1	Residential	0	0	0	0	0	0	0	0
SA002	Residential	0	0	0	0	0	0	0	0
SA003-H	Residential	0	0	0	0	0	0	0	0
SA004	Residential	0	0	-	0	0	0	0	0
SA006	Residential	0	0	0	0	0	0	0	0
SA008	Residential	0	0	0	-	0	0	0	-
SA012	Residential	0	0	0	0	0	0	0	0
SA013	Residential	0	0	0	0	0	0	0	0
SA014	Residential	0	0	0	0	0	0	-	0
SA017	Residential	0	0	-	-	0	0	0	0
SA019	Residential	0	0	0	0	0	0	0	0
SA021	Residential	0	0	0	0	0	0	0	0
SA022	Residential	0	0	0	0	0	0	0	-
SA023	Residential	0	0	0	0	0	0	0	-
SA025	Residential	0	0	0	0	0	0	0	0
SA028	Residential	0	0	0	0	0	0	0	0
SA029	Residential	0	0	0	0	0	0	0	0
SA030	Residential	0	0	0	0	0	0	0	0
SA033	Residential	0	0	0	0	0	0	0	0
SA035	Residential	0	0	0	0	0	0	-	-
SA036-H	Residential	0	0	0	0	0	0	0	-
SA042	Residential	0	0	0	0	0	0	0	0
SA045	Residential	0	0	-	-	0	0	0	0
SA046	Residential	0	0	0	-	0	0	-	0
SA047-H	Residential	0	0	0	0	0	0	0	0
SA048	Residential	0	0	0	0	0	0	0	0
SA049	Residential	0	0	0	0	0	0	0	0
SA051	Residential	0	0	0	0	0	0	0	0
SA056	Residential	0	0	0	0	0	0	-	-
SA057	Residential	0	0	0	0	0	0	0	0
SA058	Residential	0	0	0	0	0	0	0	0
SA059-H	Residential	0	0	0	0	0	0	0	0
SA061	Residential	0	0	0	0	0	0	0	0
SA063	Residential	0	0	0	0	0	0	0	0
SA067	Residential	0	0	0	0	0	0	0	0
SA068	Residential	0	0	0	0	0	0	0	0
SA069	Residential	0	0	0	-	0	0	0	0
SA072-H	Residential	0	0	0	0	0	0	-	0
SA076	Residential	0	0	0	0	0	0	0	0
SA080	Residential	0	0	0	0	0	0	-	0
SA106	Residential	0	0	0	0	0	0	0	0
SA110	Residential	0	0	0	0	0	0	0	0
SA111	Residential	0	0	0	-	0	0	-	0
SA112	Residential	0	0	0	0	0	0	0	-

Site Reference	Site Use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
SA113	Residential	0	0	0	0	0	0	0	0
SA114	Residential	0	0	0	0	0	0	0	0
SA131	Residential	0	0	0	-	0	0	0	-
SA132	Residential	0	0	0	0	0	0	0	-
SA133	Residential	0	0	0	0	0	0	0	0
SA134	Residential	0	0	0	0	0	0	0	0
SA135	Residential	0	0	--	0	0	0	-	-
SA136	Residential	0	0	0	0	0	0	-	0
DLPE01	Employment	0	0	0	0	0	0	0	0
DLPE02	Employment	0	0	-	0	0	0	-	0
DLPE03	Employment	0	0	0	0	0	0	0	0
DLPE04	Employment	0	0	0	0	0	0	0	0
DLPE05	Employment	0	0	-	0	0	0	0	0
DLPE06	Employment	0	0	0	0	0	0	0	0
DLPE07	Employment	0	0	0	0	0	0	0	0
DLPE08	Employment	0	0	0	0	0	0	-	0
DLPE09	Employment	0	0	0	0	0	0	0	0
DLPE10	Employment	0	0	0	0	0	0	-	0
DLPE11	Employment	0	0	0	0	0	0	0	0
DLPE12	Employment	0	0	0	0	0	0	-	0
DLPE13	Employment	0	0	0	0	0	0	0	0
SA003-E	Employment	0	0	0	0	0	0	0	0
SA036-E	Employment	0	0	0	0	0	0	0	-
SA044	Employment	0	-	0	0	0	0	0	-
SA047-E	Employment	0	0	0	0	0	0	0	0
SA059-E	Employment	0	0	0	0	0	0	0	0
SA070	Employment	0	0	0	0	0	0	0	0
SA072-E	Employment	0	0	0	0	0	0	-	0
SA078	Employment	0	0	0	0	0	0	0	0
SA079	Employment	0	0	0	0	0	0	0	0
SA081	Employment	0	0	0	0	0	0	0	0
SA082	Employment	0	0	0	-	0	0	0	0
SA083	Employment	0	0	0	0	0	0	0	0
SA084	Employment	0	0	0	0	0	0	0	-
SA085	Employment	0	0	0	-	0	0	0	-
SA086	Employment	0	0	0	0	0	0	-	-
SA087	Employment	0	0	0	0	0	0	0	0
SA088	Employment	0	0	0	0	0	0	0	0
SA089	Employment	0	0	0	0	0	0	0	-
SA090	Employment	0	0	0	0	0	0	0	0
SA091	Employment	0	0	0	0	0	0	0	-
SA092	Employment	0	0	0	0	0	0	-	-
DLPBHOS1	Mixed-Use (non-resi)	0	0	0	-	0	0	0	0

Site Reference	Site Use	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
DLPBHOS2	Mixed-Use (non-resi)	0	0	0	0	0	0	0	-
DLPBHOS3	Mixed Use	0	0	0	-	0	0	0	0
DLPDOS1	Mixed-Use (non-resi)	0	-	-	-	0	0	-	0
DLPDOS2	Mixed Use	0	-	-	-	0	0	-	0
DLPDOS3	Mixed Use	0	-	-	-	0	0	-	0
DLPDOS4	Mixed Use	0	-	-	-	0	0	-	0
DLPDPS1	Mixed Use	0	0	0	-	0	0	-	0
DLPDPS2	Mixed Use	0	-	-	-	0	0	-	0
DLPH0S1	Mixed Use	-	0	-	0	0	0	-	0
DLPH0S2	Mixed Use	0	0	0	0	0	0	-	0
DLPH0S3	Mixed Use	0	0	0	0	0	0	-	0
DLPH0S4	Mixed Use	0	0	0	0	0	0	-	0
DLPH0S5	Mixed Use	0	0	0	0	0	0	0	0
DLPSOS1	Mixed Use	0	0	0	0	0	0	-	-
DLPSOS2	Mixed-Use (non-resi)	0	0	0	-	0	0	-	-
DLPSOS3	Mixed Use	-	0	-	-	0	0	-	-
DLPH006/DLPH007	Mixed Use	0	0	0	0	0	0	-	0
DLPGT001	GTTS	0	0	0	0	0	0	0	0
DLPGT002	GTTS	0	0	0	0	0	0	0	-
DLPGT003	GTTS	0	0	0	0	0	0	0	-
DLPGT004	GTTS	0	0	0	0	0	0	0	-
DLPGT005	GTTS	0	0	0	0	0	0	0	0
DLPGT006	GTTS	0	0	0	0	0	0	0	-
SAGT007	GTTS	0	0	0	0	0	0	-	0
SAGT008	GTTS	0	0	0	0	0	0	0	0
SAGT009	GTTS	0	0	0	0	0	0	0	0
SAGT010	GTTS	0	0	0	0	0	0	0	-
SAGT011	GTTS	0	0	0	0	0	0	0	0
SAGT012	GTTS	0	0	0	0	0	0	0	0
SAGT013	GTTS	0	0	0	0	0	0	0	0
SAGT014	GTTS	0	0	0	0	0	0	0	0
SAGT015	GTTS	0	0	0	0	0	0	0	0
SAGT016	GTTS	0	0	0	0	0	0	-	-
SAGT017	GTTS	0	0	0	0	0	0	0	0
SAGT018	GTTS	0	0	0	-	0	0	0	-
SAGT019	GTTS	0	0	0	-	0	0	0	-
SAGT020	GTTS	0	0	0	0	0	0	0	0
SAGT021	GTTS	0	0	0	0	0	0	0	-

C.3 SA Objective 2: Landscape

C.3.1 Landscape Sensitivity

C.3.1.1 The Black Country Landscape Sensitivity Assessment³ identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Dudley, Green Belt is generally restricted to the south and north west of the borough. All reasonable alternative sites within the DLP lie outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area. Therefore, the potential effects of each site on sensitive landscapes are scored as uncertain.

C.3.1.2 Information relating to the historic environment which has strong links with landscapes/townscapes in Dudley, including the Historic Landscape Characterisation and associated designations, has been assessed under SA Objective 1 (Cultural Heritage) (see **Chapter C.2**).

Table C.3.1: Site impact matrix for SA Objective 2 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Landscape Sensitivity
DLPBHH001	Residential	+/-
DLPBHH002	Residential	+/-
DLPBHH003	Residential	+/-
DLPBHH004	Residential	+/-
DLPBHH008	Residential	+/-
DLPBHH009	Residential	+/-
DLPBHH010	Residential	+/-
DLPBHPS1	Residential	+/-
DLPBHPS2	Residential	+/-
DLPDH2/DLPDH3/DLPDH4	Residential	+/-
DLPDH1	Residential	+/-
DLPDH5	Residential	+/-
DLPDH6	Residential	+/-
DLPDH7	Residential	+/-
DLPDH8	Residential	+/-
DLPDH9	Residential	+/-
DLPHH1	Residential	+/-
DLPHH2	Residential	+/-
DLP SH1	Residential	+/-
DLP SH2	Residential	+/-
DLP SH3	Residential	+/-

³ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date Accessed: 04/08/23]

Site Reference	Site Use	Landscape Sensitivity
DLPSH4	Residential	+/-
DLPSH5	Residential	+/-
DLPSH6	Residential	+/-
DLPSH7	Residential	+/-
DLPH001	Residential	+/-
DLPH002	Residential	+/-
DLPH003	Residential	+/-
DLPH004	Residential	+/-
DLPH005	Residential	+/-
DLPH006	Residential	+/-
DLPH007	Residential	+/-
DLPH008	Residential	+/-
DLPH009	Residential	+/-
DLPH010	Residential	+/-
DLPH011	Residential	+/-
DLPH012	Residential	+/-
DLPH013	Residential	+/-
DLPH014	Residential	+/-
DLPH015/DLPH026	Residential	+/-
DLPH016	Residential	+/-
DLPH017	Residential	+/-
DLPH018	Residential	+/-
DLPH019	Residential	+/-
DLPH020	Residential	+/-
DLPH021	Residential	+/-
DLPH022	Residential	+/-
DLPH023	Residential	+/-
DLPH024	Residential	+/-
DLPH025	Residential	+/-
DLPH027	Residential	+/-
DLPH028	Residential	+/-
DLPH029	Residential	+/-
DLPH030	Residential	+/-
DLPH031	Residential	+/-
DLPH032	Residential	+/-
DLPH033	Residential	+/-
DLPH034	Residential	+/-
DLPH035	Residential	+/-
DLPH036	Residential	+/-
DLPH037	Residential	+/-
DLPH038	Residential	+/-
DLPH039	Residential	+/-
DLPH040	Residential	+/-
DLPH041	Residential	+/-
DLPH042	Residential	+/-

Site Reference	Site Use	Landscape Sensitivity
DLPH043	Residential	+/-
DLPH044	Residential	+/-
DLPH045	Residential	+/-
DLPH046	Residential	+/-
DLPH047	Residential	+/-
DLPH048	Residential	+/-
DLPH049	Residential	+/-
DLPH050	Residential	+/-
DLPH051	Residential	+/-
DLPH052	Residential	+/-
DLPH053	Residential	+/-
DLPH054	Residential	+/-
DLPH055	Residential	+/-
DLPH056	Residential	+/-
DLPH057	Residential	+/-
DLPH058	Residential	+/-
DLPH059	Residential	+/-
DLPH060	Residential	+/-
DLPH061	Residential	+/-
DLPH062	Residential	+/-
DLPKQH1	Residential	+/-
SA002	Residential	+/-
SA003-H	Residential	+/-
SA004	Residential	+/-
SA006	Residential	+/-
SA008	Residential	+/-
SA012	Residential	+/-
SA013	Residential	+/-
SA014	Residential	+/-
SA017	Residential	+/-
SA019	Residential	+/-
SA021	Residential	+/-
SA022	Residential	+/-
SA023	Residential	+/-
SA025	Residential	+/-
SA028	Residential	+/-
SA029	Residential	+/-
SA030	Residential	+/-
SA033	Residential	+/-
SA035	Residential	+/-
SA036-H	Residential	+/-
SA042	Residential	+/-
SA045	Residential	+/-
SA046	Residential	+/-
SA047-H	Residential	+/-

Site Reference	Site Use	Landscape Sensitivity
SA048	Residential	+/-
SA049	Residential	+/-
SA051	Residential	+/-
SA056	Residential	+/-
SA057	Residential	+/-
SA058	Residential	+/-
SA059-H	Residential	+/-
SA061	Residential	+/-
SA063	Residential	+/-
SA067	Residential	+/-
SA068	Residential	+/-
SA069	Residential	+/-
SA072-H	Residential	+/-
SA076	Residential	+/-
SA080	Residential	+/-
SA106	Residential	+/-
SA110	Residential	+/-
SA111	Residential	+/-
SA112	Residential	+/-
SA113	Residential	+/-
SA114	Residential	+/-
SA131	Residential	+/-
SA132	Residential	+/-
SA133	Residential	+/-
SA134	Residential	+/-
SA135	Residential	+/-
SA136	Residential	+/-
DLPE01	Employment	+/-
DLPE02	Employment	+/-
DLPE03	Employment	+/-
DLPE04	Employment	+/-
DLPE05	Employment	+/-
DLPE06	Employment	+/-
DLPE07	Employment	+/-
DLPE08	Employment	+/-
DLPE09	Employment	+/-
DLPE10	Employment	+/-
DLPE11	Employment	+/-
DLPE12	Employment	+/-
DLPE13	Employment	+/-
SA003-E	Employment	+/-
SA036-E	Employment	+/-
SA044	Employment	+/-
SA047-E	Employment	+/-
SA059-E	Employment	+/-

Site Reference	Site Use	Landscape Sensitivity
SA070	Employment	+/-
SA072-E	Employment	+/-
SA078	Employment	+/-
SA079	Employment	+/-
SA081	Employment	+/-
SA082	Employment	+/-
SA083	Employment	+/-
SA084	Employment	+/-
SA085	Employment	+/-
SA086	Employment	+/-
SA087	Employment	+/-
SA088	Employment	+/-
SA089	Employment	+/-
SA090	Employment	+/-
SA091	Employment	+/-
SA092	Employment	+/-
DLPBHOS1	Mixed-Use (non-resi)	+/-
DLPBHOS2	Mixed-Use (non-resi)	+/-
DLPBHOS3	Mixed-use	+/-
DLPDOS1	Mixed-Use (non-resi)	+/-
DLPDOS2	Mixed-use	+/-
DLPDOS3	Mixed-use	+/-
DLPDOS4	Mixed-use	+/-
DLPDPS1	Mixed-use	+/-
DLPDPS2	Mixed-use	+/-
DLPHOS1	Mixed-use	+/-
DLPHOS2	Mixed-use	+/-
DLPHOS3	Mixed-use	+/-
DLPHOS4	Mixed-use	+/-
DLPHOS5	Mixed-use	+/-
DLPSOS1	Mixed Use	+/-
DLPSOS2	Mixed-Use (non-resi)	+/-
DLPSOS3	Mixed Use	+/-
DLPH006/DLPH007	Mixed Use	+/-
DLPGT001	GTTTS	+/-
DLPGT002	GTTTS	+/-
DLPGT003	GTTTS	+/-
DLPGT004	GTTTS	+/-
DLPGT005	GTTTS	+/-
DLPGT006	GTTTS	+/-
SAGT007	GTTTS	+/-
SAGT008	GTTTS	+/-
SAGT009	GTTTS	+/-

Site Reference	Site Use	Landscape Sensitivity
SAGT010	GTTTS	+/-
SAGT011	GTTTS	+/-
SAGT012	GTTTS	+/-
SAGT013	GTTTS	+/-
SAGT014	GTTTS	+/-
SAGT015	GTTTS	+/-
SAGT016	GTTTS	+/-
SAGT017	GTTTS	+/-
SAGT018	GTTTS	+/-
SAGT019	GTTTS	+/-
SAGT020	GTTTS	+/-
SAGT021	GTTTS	+/-

C.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

C.4.1 Habitats Sites

C.4.1.1 Habitats sites (previously referred to as 'European sites') are a network of nature protection areas which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. 'Fens Pools' SAC is situated in the centre of Dudley. Urbanisation effects⁴ typically occur when development is located close to a Habitats site boundary. A distance of 500m has been used to recognise the distance cat predation is likely to take place and also the increased frequency of visits made by people living in close proximity to a designated site. This 500m buffer is based on strategic mitigation schemes elsewhere in the UK⁵⁶. Four reasonable alternative sites (DLPBHH008, SA030, SA051 and DLPH006/DLPH007) are located within 500m of 'Fens Pools' SAC and could therefore potentially give rise to a minor negative impact on the Habitats site.

C.4.2 Sites of Special Scientific Interest

C.4.2.1 There are 13 Sites of Special Scientific Interest (SSSIs) within Dudley, including 'Fens Pools' and 'Ketley Claypit' SSSIs located in the centre of the borough. Site DLPKQH1 coincides with 'Ketley Claypit' SSSI, with approximately 1.40ha of land in the north almost wholly coinciding with the SSSI. Additionally, site DLPH028 is located adjacent to 'The Leasowes' SSSI. The proposed development at these two sites could potentially have direct major negative impacts on the SSSIs.

C.4.2.2 There are seven further sites located within Impact Risk Zones (IRZs) surrounding SSSIs which indicate that the proposed level of residential development should be consulted on with Natural England; these sites are identified as potentially resulting in a minor negative impact on nearby SSSIs. The seven sites are DLPH001, DLPH037, DLPBHH008, DLPH006/DLPH007, SA25, SA51, and SA30. The remaining sites in Dudley are located within IRZs which do not indicate the proposed use (or proposed level of residential

⁴ Urbanisation impacts may include noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering, and vandalism.

⁵ Thames Basin Heaths Strategic Joint Partnership. Thames Basin Heaths SPA Delivery Framework. Available at: <https://www.guildford.gov.uk/media/21979/Thames-Basin-Heaths-SPA-delivery-framework/pdf/thames-basin-heaths-spa-delivery-framework.pdf?m=636114482807070000> [Date Accessed: 09/10/23].

⁶ Panter, C., Liley, D., Lake, S., Saunders, P., and Caals, Z. 2022. Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan, Report by Footprint Ecology for Dacorum Borough Council.

development) as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

C.4.3 National Nature Reserves

C.4.3.1 There are two National Nature Reserves (NNRs) located within Dudley, both of which are geological NNRs called 'Wren's Nest' and 'Saltwells'. There are 12 sites located within close proximity to one of these NNRs. Site DLPH007 is located approximately 500m from the NNR and Site DLPH031 is located approximately 510m from the NNR, however, due to the site being currently undeveloped and a large site comprising 26.40ha, it could be expected to result in adverse impacts on the NNR to some extent. The proposed development at these 12 sites is considered to have the potential to result in adverse impacts on the NNRs to some extent, due to an increased risk of development related threats and pressures. These 12 sites have been assessed as having minor negative impacts on the NNRs.

C.4.3.2 The proposed development at the remaining sites in Dudley would be unlikely to significantly impact either of these NNRs, and therefore a negligible impact has been identified.

C.4.4 Ancient Woodland

C.4.4.1 In Dudley there are sparsely distributed areas of ancient woodland, mainly restricted to the Green Belt, but with a small proportion located in the urban areas. There are four sites located in close proximity to areas of ancient woodland: Site DLPH037 is located approximately 80m west of ancient woodland, site DLPGT018 is located approximately 60m from ancient woodland at 'Birch Wood', site DLPH028 is located approximately 138m from ancient woodland south of the site, and Site SA028 is located 150m south of Ancient woodland. The proposed development at these four sites could potentially have a minor negative impact on these ancient woodlands due to an increased risk of disturbance. The remaining sites in Dudley are unlikely to have a significant impact on any ancient woodland.

C.4.5 Local Nature Reserves

C.4.5.1 There are eight Local Nature Reserves (LNRs) within Dudley, mostly clustered in the north of the borough and within the Green Belt. Site DLPH001 is located adjacent to 'Buckpool and Fens Pools' LNR. A further 23 sites are located in close proximity to LNRs. The proposed development at these 24 sites could potentially result in a minor negative impact on these LNRs, due to an increased risk of development related threats and pressures. The majority of sites in Dudley are deemed unlikely to significantly impact these LNRs, primarily due to being separated by existing built form.

C.4.6 Sites of Importance for Nature Conservation

C.4.6.1 Within Dudley, there are 61 Sites of Importance for Nature Conservation (SINCs) throughout the area, primarily comprising small areas of woodland. Five proposed sites (DLPH022, DLPKQH1, DLPGT002, DLPGT007 and DLPGT021) coincide wholly or partially with the following SINCs, respectively: 'Ketley Quarry', 'Freehold Farm, Stour Valley', 'Oak Farm' and 'Buckpool and The Leys'. The proposed development at these five sites could potentially have direct major negative impacts on these SINCs.

C.4.6.2 Additionally, 11 sites are located adjacent to SINCs, including Site DLPH013 which is adjacent to 'The Hayes' SINC and the employment site DUDEMP12 which is adjacent to 'Barrows Hill and Coopers Bank' SINC. The proposed development at these 11 sites may be expected to have a minor negative impact on these SINCs, due to an increased risk of development related threats and pressures. The proposed development at the remaining sites in Dudley are unlikely to significantly impact any SINC.

C.4.7 Sites of Local Importance for Nature Conservation

C.4.7.1 There are approximately 126 Sites of Local Importance for Nature Conservation (SLINCs) within Dudley, covering a range of habitats and semi-natural spaces including parkland, sections of the canal network and disused railways. 30 sites coincide wholly or partially with these SLINCs, including Sites DLPS0S1 and DLPSH2 which wholly coincide with 'Stour Valley' SLINC. Furthermore, 40 sites in Dudley are located adjacent to a SLINC. The proposed development at these 70 sites could potentially result in a minor negative impact on SLINCs, due to an increased risk of development related threats and pressures. The remaining sites are located further away from SLINCs, and as such, the proposed development at these sites would be less likely to significantly impact any SLINC.

C.4.8 Geological Sites

C.4.8.1 Geological sites have been identified throughout the borough, which form part of the Black Country Global Geopark⁷. These sites include a range of notable geological features and formations. There are three sites that coincide partly or wholly with a geological site. Site DLPH022 coincides with 'Buckpools and the Leys' geology site, site DLPKQH1 coincides with 'Ketley Quarry', and DLPH028 coincides with 'Leasowe Park' geology site. Therefore, the proposed development at these three sites could potentially have a minor negative impact on these areas of geological importance. No other sites in Dudley coincide with identified geological sites, and therefore the remaining sites are likely to have a negligible impact.

⁷ Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/>
[Date accessed: 04/08/23]

C.4.9 Priority Habitats

C.4.9.1 Priority habitats can be found throughout the Dudley area and include 'deciduous woodland', 'traditional orchard', 'good quality semi-improved grassland' and 'coastal and floodplain grazing marsh'. 22 sites coincide wholly or partially with these priority habitats and as such could potentially result in the loss or degradation of these habitats, and therefore the proposed development at these sites may result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat would be expected to have a negligible impact.

Table C.4.1: Sites impact matrix for SA Objective 3 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NINRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
DLPBHH001	Residential	+/-	0	0	0	0	0	0	0	0
DLPBHH002	Residential	+/-	0	0	0	0	0	-	0	0
DLPBHH003	Residential	+/-	0	0	0	0	0	-	0	0
DLPBHH004	Residential	+/-	0	0	0	0	0	0	0	0
DLPBHH008	Residential	-	-	0	0	0	0	0	0	0
DLPBHH009	Residential	+/-	0	0	0	0	0	0	0	0
DLPBHH010	Residential	+/-	0	0	0	0	0	0	0	0
DLPBHPS1	Residential	+/-	0	0	0	0	0	0	0	0
DLPBHPS2	Residential	+/-	0	0	0	0	0	-	0	0
DLPDH2/DLPDH3/DLPDH4	Residential	+/-	0	0	0	0	0	0	0	0
DLPDH1	Residential	+/-	0	0	0	0	0	0	0	0
DLPDH5	Residential	+/-	0	0	0	0	0	0	0	0
DLPDH6	Residential	+/-	0	0	0	0	0	0	0	0
DLPDH7	Residential	+/-	0	0	0	0	0	0	0	0
DLPDH8	Residential	+/-	0	0	0	0	0	0	0	0
DLPDH9	Residential	+/-	0	0	0	0	0	0	0	0
DLPHH1	Residential	+/-	0	0	0	0	0	0	0	0
DLPHH2	Residential	+/-	0	0	0	0	0	-	0	0
DLPSH1	Residential	+/-	0	0	0	0	0	0	0	0
DLPSH2	Residential	+/-	0	0	0	0	0	-	0	0
DLPSH3	Residential	+/-	0	0	0	0	0	-	0	0
DLPSH4	Residential	+/-	0	0	0	0	0	0	0	0
DLPSH5	Residential	+/-	0	0	0	0	0	0	0	0
DLPSH6	Residential	+/-	0	0	0	0	-	0	0	0
DLPSH7	Residential	+/-	0	0	0	0	0	0	0	0
DLPH001	Residential	+/-	-	0	0	-	-	0	0	0
DLPH002	Residential	+/-	0	0	0	0	-	-	0	-
DLPH003	Residential	+/-	0	0	0	0	0	0	0	0
DLPH004	Residential	+/-	0	0	0	0	-	-	0	-
DLPH005	Residential	+/-	0	0	0	0	0	0	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
DLPH006	Residential	+/-	0	0	0	0	0	0	0	0
DLPH007	Residential	+/-	0	-	0	-	0	-	0	-
DLPH008	Residential	+/-	0	0	0	0	-	-	0	0
DLPH009	Residential	+/-	0	0	0	0	0	0	0	0
DLPH010	Residential	+/-	0	0	0	0	0	-	0	0
DLPH011	Residential	+/-	0	0	0	-	0	0	0	0
DLPH012	Residential	+/-	0	0	0	0	0	0	0	0
DLPH013	Residential	+/-	0	0	0	0	-	0	0	-
DLPH014	Residential	+/-	0	0	0	0	0	0	0	0
DLPH015/DLPH026	Residential	+/-	0	0	0	0	0	-	0	0
DLPH016	Residential	+/-	0	0	0	0	0	-	0	0
DLPH017	Residential	+/-	0	0	0	0	0	0	0	0
DLPH018	Residential	+/-	0	0	0	0	0	0	0	0
DLPH019	Residential	+/-	0	0	0	0	0	0	0	0
DLPH020	Residential	+/-	0	0	0	0	0	0	0	0
DLPH021	Residential	+/-	0	0	0	0	0	0	0	0
DLPH022	Residential	+/-	0	0	0	-	--	0	-	-
DLPH023	Residential	+/-	0	0	0	0	0	-	0	0
DLPH024	Residential	+/-	0	0	0	0	0	0	0	0
DLPH025	Residential	+/-	0	0	0	0	0	0	0	0
DLPH027	Residential	+/-	0	0	0	0	0	-	0	-
DLPH028	Residential	+/-	--	0	-	0	-	-	-	0
DLPH029	Residential	+/-	0	0	0	0	0	0	0	0
DLPH030	Residential	+/-	0	0	0	0	0	-	0	0
DLPH031	Residential	+/-	0	-	0	-	0	-	0	0
DLPH032	Residential	+/-	0	0	0	0	0	0	0	0
DLPH033	Residential	+/-	0	0	0	0	0	0	0	0
DLPH034	Residential	+/-	0	0	0	0	0	-	0	0
DLPH035	Residential	+/-	0	0	0	0	0	-	0	0
DLPH036	Residential	+/-	0	0	0	-	0	-	0	0
DLPH037	Residential	+/-	-	-	-	-	0	0	0	0
DLPH038	Residential	+/-	0	0	0	0	0	0	0	0
DLPH039	Residential	+/-	0	0	0	0	0	0	0	0
DLPH040	Residential	+/-	0	0	0	0	0	0	0	0
DLPH041	Residential	+/-	0	0	0	0	0	0	0	0
DLPH042	Residential	+/-	0	0	0	0	0	-	0	-
DLPH043	Residential	+/-	0	0	0	0	0	0	0	0
DLPH044	Residential	+/-	0	0	0	0	0	0	0	0
DLPH045	Residential	+/-	0	0	0	0	0	0	0	0
DLPH046	Residential	+/-	0	0	0	0	-	0	0	0
DLPH047	Residential	+/-	0	0	0	-	0	0	0	0
DLPH048	Residential	+/-	0	0	0	0	0	-	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
DLPH049	Residential	+/-	0	0	0	0	0	0	0	0
DLPH050	Residential	+/-	0	0	0	0	0	0	0	0
DLPH051	Residential	+/-	0	0	0	0	0	0	0	0
DLPH052	Residential	+/-	0	0	0	0	0	-	0	0
DLPH053	Residential	+/-	0	0	0	0	0	-	0	0
DLPH054	Residential	+/-	0	0	0	0	0	0	0	0
DLPH055	Residential	+/-	0	0	0	0	0	0	0	0
DLPH056	Residential	+/-	0	0	0	0	0	0	0	0
DLPH057	Residential	+/-	0	0	0	-	-	0	0	0
DLPH058	Residential	+/-	0	0	0	0	0	0	0	0
DLPH059	Residential	+/-	0	0	0	0	0	0	0	0
DLPH060	Residential	+/-	0	0	0	0	0	0	0	0
DLPH061	Residential	+/-	0	0	0	-	0	0	0	0
DLPH062	Residential	+/-	0	0	0	0	0	0	0	0
DLPKQH1	Residential	+/-	--	0	0	0	--	-	-	-
SA002	Residential	+/-	0	0	0	0	0	0	0	0
SA003-H	Residential	+/-	0	0	0	0	0	0	0	0
SA004	Residential	+/-	0	0	0	0	0	0	0	0
SA006	Residential	+/-	0	0	0	0	0	0	0	0
SA008	Residential	+/-	0	0	0	0	0	0	0	0
SA012	Residential	+/-	0	0	0	0	0	0	0	0
SA013	Residential	+/-	0	0	0	0	0	0	0	0
SA014	Residential	+/-	0	-	0	-	0	-	0	0
SA017	Residential	+/-	0	-	0	-	0	0	0	0
SA019	Residential	+/-	0	0	0	0	0	0	0	0
SA021	Residential	+/-	0	-	0	-	0	0	0	0
SA022	Residential	+/-	0	-	0	-	0	0	0	0
SA023	Residential	+/-	0	-	0	-	0	0	0	0
SA025	Residential	+/-	-	0	0	-	0	0	0	0
SA028	Residential	+/-	0	0	-	0	0	-	0	0
SA029	Residential	+/-	0	0	0	0	0	0	0	-
SA030	Residential	-	-	0	0	-	0	0	0	0
SA033	Residential	+/-	0	0	0	0	0	-	0	-
SA035	Residential	+/-	0	0	0	0	0	-	0	-
SA036-H	Residential	+/-	0	0	0	0	0	0	0	0
SA042	Residential	+/-	0	0	0	0	0	0	0	0
SA045	Residential	+/-	0	0	0	0	0	0	0	0
SA046	Residential	+/-	0	0	0	0	0	0	0	0
SA047-H	Residential	+/-	0	0	0	0	0	-	0	0
SA048	Residential	+/-	0	0	0	0	0	0	0	-
SA049	Residential	+/-	0	-	0	-	0	-	0	0
SA051	Residential	-	-	-	0	-	0	0	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
SA056	Residential	+/-	0	0	0	0	0	-	0	-
SA057	Residential	+/-	0	0	0	0	0	0	0	0
SA058	Residential	+/-	0	0	0	-	0	-	0	0
SA059-H	Residential	+/-	0	0	0	0	0	0	0	0
SA061	Residential	+/-	0	0	0	0	0	0	0	0
SA063	Residential	+/-	0	0	0	0	0	-	0	-
SA067	Residential	+/-	0	0	0	0	0	0	0	-
SA068	Residential	+/-	0	0	0	0	0	0	0	0
SA069	Residential	+/-	0	0	0	0	0	0	0	0
SA072-H	Residential	+/-	0	0	0	0	0	-	0	0
SA076	Residential	+/-	0	0	0	0	0	0	0	0
SA080	Residential	+/-	0	0	0	0	0	-	0	0
SA106	Residential	+/-	0	0	0	0	0	-	0	0
SA110	Residential	+/-	0	0	0	0	0	0	0	0
SA111	Residential	+/-	0	0	0	0	0	0	0	0
SA112	Residential	+/-	0	0	0	0	0	-	0	0
SA113	Residential	+/-	0	0	0	0	0	-	0	0
SA114	Residential	+/-	0	0	0	0	0	-	0	0
SA131	Residential	+/-	0	0	0	0	0	0	0	0
SA132	Residential	+/-	0	0	0	-	0	-	0	0
SA133	Residential	+/-	0	0	0	0	0	-	0	0
SA134	Residential	+/-	0	0	0	0	0	-	0	0
SA135	Residential	+/-	0	0	0	0	0	-	0	0
SA136	Residential	+/-	0	0	0	0	0	-	0	0
DLPE01	Employment	+/-	0	0	0	0	0	0	0	0
DLPE02	Employment	+/-	0	0	0	0	0	0	0	0
DLPE03	Employment	+/-	0	0	0	0	0	0	0	-
DLPE04	Employment	+/-	0	0	0	0	0	0	0	0
DLPE05	Employment	+/-	0	-	0	-	0	0	0	0
DLPE06	Employment	+/-	0	0	0	0	0	-	0	0
DLPE07	Employment	+/-	0	0	0	0	0	0	0	0
DLPE08	Employment	+/-	0	0	0	0	0	0	0	0
DLPE09	Employment	+/-	0	0	0	0	0	0	0	0
DLPE10	Employment	+/-	0	0	0	0	0	0	0	0
DLPE11	Employment	+/-	0	0	0	0	0	0	0	0
DLPE12	Employment	+/-	0	0	0	0	0	0	0	0
DLPE13	Employment	+/-	0	0	0	-	-	0	0	0
SA003-E	Employment	+/-	0	0	0	0	0	0	0	0
SA036-E	Employment	+/-	0	0	0	0	0	0	0	0
SA044	Employment	+/-	0	0	0	0	0	0	0	0
SA047-E	Employment	+/-	0	0	0	0	0	-	0	0
SA059-E	Employment	+/-	0	0	0	0	0	0	0	0

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINGs	SLINCs	Geological Sites	Priority Habitats
SA070	Employment	+/-	0	0	0	0	0	0	0	0
SA072-E	Employment	+/-	0	0	0	0	0	-	0	0
SA078	Employment	+/-	0	0	0	0	0	-	0	0
SA079	Employment	+/-	0	0	0	0	0	0	0	0
SA081	Employment	+/-	0	0	0	0	0	0	0	0
SA082	Employment	+/-	0	0	0	0	0	-	0	0
SA083	Employment	+/-	0	0	0	0	0	0	0	0
SA084	Employment	+/-	0	0	0	0	0	0	0	0
SA085	Employment	+/-	0	0	0	0	0	-	0	0
SA086	Employment	+/-	0	0	0	0	0	-	0	0
SA087	Employment	+/-	0	0	0	0	0	0	0	0
SA088	Employment	+/-	0	0	0	0	0	0	0	0
SA089	Employment	+/-	0	0	0	0	0	0	0	0
SA090	Employment	+/-	0	0	0	0	0	0	0	0
SA091	Employment	+/-	0	0	0	0	0	0	0	0
SA092	Employment	+/-	0	0	0	0	0	-	0	0
DLPBHOS1	Mixed-Use (non-resi)	+/-	0	0	0	0	0	0	0	0
DLPBHOS2	Mixed-Use (non-resi)	+/-	0	0	0	0	0	-	0	0
DLPBHOS3	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLPDOS1	Mixed-Use (non-resi)	+/-	0	0	0	0	0	0	0	0
DLPDOS2	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLPDOS3	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLPDOS4	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLPDPS1	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLPDPS2	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLPHOS1	Mixed-use	+/-	0	0	0	0	0	-	0	0
DLPHOS2	Mixed-use	+/-	0	0	0	0	0	-	0	0
DLPHOS3	Mixed-use	+/-	0	0	0	0	0	-	0	0
DLPHOS4	Mixed-use	+/-	0	0	0	0	0	-	0	0
DLPHOS5	Mixed-use	+/-	0	0	0	0	0	0	0	0
DLP SOS1	Mixed Use	+/-	0	0	0	0	0	-	0	-
DLP SOS2	Mixed-Use (non-resi)	+/-	0	0	0	0	0	-	0	-
DLP SOS3	Mixed Use	+/-	0	0	0	0	0	0	0	0
DLPH006/DLPH007	Mixed Use	-	-	0	0	0	0	-	0	0
DLPGT001	GTTS	+/-	0	0	0	0	0	0	0	0
DLPGT002	GTTS	+/-	0	0	0	0	--	0	0	0
DLPGT003	GTTS	+/-	0	0	0	0	0	-	0	-
DLPGT004	GTTS	+/-	0	0	0	0	0	-	0	0
DLPGT005	GTTS	+/-	0	0	0	0	-	-	0	-
DLPGT006	GTTS	+/-	0	0	0	0	0	-	0	-

Site Reference	Site Use	Habitats Sites	SSSIs and IRZs	NNRs	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
SAGT007	GTTS	+/-	0	0	0	0	-	0	0	0
SAGT008	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT009	GTTS	+/-	0	0	0	0	0	-	0	0
SAGT010	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT011	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT012	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT013	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT014	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT015	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT016	GTTS	+/-	0	0	0	0	0	-	0	0
SAGT017	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT018	GTTS	+/-	0	-	-	-	0	-	0	0
SAGT019	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT020	GTTS	+/-	0	0	0	0	0	0	0	0
SAGT021	GTTS	+/-	0	0	0	0	-	-	0	-

C.5 SA Objective 4: Climate Change Mitigation

C.5.1 Potential Increase in Carbon Footprint

- C.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 131 sites are proposed for the development of 140 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution to Dudley's total carbon emissions.
- C.5.1.2 18 sites are proposed for the development of between 140 and 1,399 dwellings. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Dudley's total, by more than 0.1%. Therefore, a minor negative impact on Dudley's carbon emissions would be expected at these 18 sites.
- C.5.1.3 The carbon emissions likely to be generated as a result of non-residential development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present. The nature and design of pitches/plots which could be developed at each GTTS site is unknown at present and therefore all GTTS sites have been assessed as uncertain.
- C.5.1.4 Site DLPBHOS3 proposes "*residential institutions*" within Policy DLPBHOS3, and at the time of writing no residential capacity is provided. It is therefore unknown as to the extent of carbon emissions likely to be generated at this site and the impact is uncertain.

Table C.5.1: Sites impact matrix for SA Objective 4 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Potential Increase in Carbon Footprint
DLPBHH001	Residential	-
DLPBHH002	Residential	0
DLPBHH003	Residential	-
DLPBHH004	Residential	0
DLPBHH008	Residential	0
DLPBHH009	Residential	0
DLPBHH010	Residential	0
DLPBHPS1	Residential	-
DLPBHPS2	Residential	-
DLPDH2/DLPDH3/DLPDH4	Residential	0
DLPDH1	Residential	0
DLPDH5	Residential	0
DLPDH6	Residential	0
DLPDH7	Residential	0
DLPDH8	Residential	0
DLPDH9	Residential	0
DLPHH1	Residential	0
DLPHH2	Residential	0
DLPSH1	Residential	0
DLPSH2	Residential	0
DLPSH3	Residential	0
DLPSH4	Residential	0
DLPSH5	Residential	0
DLPSH6	Residential	0
DLPSH7	Residential	0
DLPH001	Residential	0
DLPH002	Residential	-
DLPH003	Residential	0
DLPH004	Residential	-
DLPH005	Residential	0
DLPH006	Residential	0
DLPH007	Residential	0
DLPH008	Residential	0
DLPH009	Residential	0
DLPH010	Residential	0
DLPH011	Residential	0
DLPH012	Residential	0
DLPH013	Residential	0
DLPH014	Residential	0
DLPH015/DLPH026	Residential	0
DLPH016	Residential	0
DLPH017	Residential	0

Site Reference	Site Use	Potential Increase in Carbon Footprint
DLPH018	Residential	0
DLPH019	Residential	0
DLPH020	Residential	0
DLPH021	Residential	0
DLPH022	Residential	0
DLPH023	Residential	0
DLPH024	Residential	0
DLPH025	Residential	0
DLPH027	Residential	0
DLPH028	Residential	0
DLPH029	Residential	0
DLPH030	Residential	-
DLPH031	Residential	-
DLPH032	Residential	0
DLPH033	Residential	0
DLPH034	Residential	0
DLPH035	Residential	0
DLPH036	Residential	0
DLPH037	Residential	0
DLPH038	Residential	0
DLPH039	Residential	0
DLPH040	Residential	0
DLPH041	Residential	0
DLPH042	Residential	0
DLPH043	Residential	0
DLPH044	Residential	0
DLPH045	Residential	0
DLPH046	Residential	0
DLPH047	Residential	0
DLPH048	Residential	0
DLPH049	Residential	0
DLPH050	Residential	-
DLPH051	Residential	0
DLPH052	Residential	0
DLPH053	Residential	0
DLPH054	Residential	0
DLPH055	Residential	0
DLPH056	Residential	0
DLPH057	Residential	0
DLPH058	Residential	0
DLPH059	Residential	0
DLPH060	Residential	0
DLPH061	Residential	0

Site Reference	Site Use	Potential Increase in Carbon Footprint
DLPH062	Residential	0
DLPKQH1	Residential	-
SA002	Residential	0
SA003-H	Residential	0
SA004	Residential	0
SA006	Residential	0
SA008	Residential	0
SA012	Residential	0
SA013	Residential	0
SA014	Residential	0
SA017	Residential	0
SA019	Residential	0
SA021	Residential	-
SA022	Residential	0
SA023	Residential	0
SA025	Residential	0
SA028	Residential	0
SA029	Residential	0
SA030	Residential	0
SA033	Residential	0
SA035	Residential	0
SA036-H	Residential	0
SA042	Residential	0
SA045	Residential	0
SA046	Residential	0
SA047-H	Residential	-
SA048	Residential	-
SA049	Residential	-
SA051	Residential	0
SA056	Residential	0
SA057	Residential	0
SA058	Residential	0
SA059-H	Residential	0
SA061	Residential	0
SA063	Residential	0
SA067	Residential	0
SA068	Residential	0
SA069	Residential	0
SA072-H	Residential	0
SA076	Residential	0
SA080	Residential	0
SA106	Residential	0
SA110	Residential	0

Site Reference	Site Use	Potential Increase in Carbon Footprint
SA111	Residential	0
SA112	Residential	-
SA113	Residential	0
SA114	Residential	0
SA131	Residential	0
SA132	Residential	0
SA133	Residential	-
SA134	Residential	0
SA135	Residential	0
SA136	Residential	0
DLPE01	Employment	+/-
DLPE02	Employment	+/-
DLPE03	Employment	+/-
DLPE04	Employment	+/-
DLPE05	Employment	+/-
DLPE06	Employment	+/-
DLPE07	Employment	+/-
DLPE08	Employment	+/-
DLPE09	Employment	+/-
DLPE10	Employment	+/-
DLPE11	Employment	+/-
DLPE12	Employment	+/-
DLPE13	Employment	+/-
SA003-E	Employment	+/-
SA036-E	Employment	+/-
SA044	Employment	+/-
SA047-E	Employment	+/-
SA059-E	Employment	+/-
SA070	Employment	+/-
SA072-E	Employment	+/-
SA078	Employment	+/-
SA079	Employment	+/-
SA081	Employment	+/-
SA082	Employment	+/-
SA083	Employment	+/-
SA084	Employment	+/-
SA085	Employment	+/-
SA086	Employment	+/-
SA087	Employment	+/-
SA088	Employment	+/-
SA089	Employment	+/-
SA090	Employment	+/-
SA091	Employment	+/-

Site Reference	Site Use	Potential Increase in Carbon Footprint
SA092	Employment	+/-
DLPBHOS1	Mixed-Use (non-resi)	+/-
DLPBHOS2	Mixed-Use (non-resi)	+/-
DLPBHOS3	Mixed-use	+/-
DLPDOS1	Mixed-Use (non-resi)	+/-
DLPDOS2	Mixed-use	0
DLPDOS3	Mixed-use	0
DLPDOS4	Mixed-use	0
DLPDPS1	Mixed-use	0
DLPDPS2	Mixed-use	-
DLPHOS1	Mixed-use	0
DLPHOS2	Mixed-use	0
DLPHOS3	Mixed-use	0
DLPHOS4	Mixed-use	0
DLPHOS5	Mixed-use	0
DLPSOS1	Mixed-use	0
DLPSOS2	Mixed-Use (non-resi)	+/-
DLPSOS3	Mixed-use	0
DLPH006/DLPH007	Mixed-use	-
DLPGT001	GTTS	+/-
DLPGT002	GTTS	+/-
DLPGT003	GTTS	+/-
DLPGT004	GTTS	+/-
DLPGT005	GTTS	+/-
DLPGT006	GTTS	+/-
SAGT007	GTTS	+/-
SAGT008	GTTS	+/-
SAGT009	GTTS	+/-
SAGT010	GTTS	+/-
SAGT011	GTTS	+/-
SAGT012	GTTS	+/-
SAGT013	GTTS	+/-
SAGT014	GTTS	+/-
SAGT015	GTTS	+/-
SAGT016	GTTS	+/-
SAGT017	GTTS	+/-
SAGT018	GTTS	+/-
SAGT019	GTTS	+/-
SAGT020	GTTS	+/-
SAGT021	GTTS	+/-

C.6 SA Objective 5: Climate Change Adaptation

C.6.1 Flood Zones

- C.6.1.1 Flood Zones 2 and 3 occur within the vicinity of watercourses such as the River Stour, with the largest areas of flood risk generally found in the south of the borough. 12 sites in Dudley are located partially or wholly within Flood Zone 2 and Flood Zone 3 and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Dudley.
- C.6.1.2 Two sites (SA035 and SA042) are partially located within Flood Zone 2 and would and therefore, the proposed development at these two sites could potentially have a minor negative impact on flooding in the area.
- C.6.1.3 The remaining sites which are located wholly within Flood Zone 1 would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

C.6.2 Indicative Flood Zone 3b

- C.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen in future due to climate change. In Dudley this generally covers areas currently within Flood Zone 3. Three sites partially coincide with Indicative Flood Zone 3b (DLPGT004, DLPGT002 and DLPE07). Therefore, the proposed development at these three sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Dudley.
- C.6.2.2 The remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

C.6.3 Surface Water Flood Risk

- C.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. Areas affected by surface water flooding in Dudley is widespread, and extensively affects roads and pathways. The proposed development at 47 sites which are located within areas of high SWFR could potentially have a major negative impact on flooding, as development could potentially locate site end users in areas at high risk of surface water flooding as well as exacerbate SWFR in surrounding locations. The proposed development

at a further 30 sites in Dudley which are located within with areas of medium SWFR could potentially have a minor negative impact on surface water flooding. There are 53 sites that are located within with areas of low SWFR and could potentially have a minor negative impact on surface water flooding.

- C.6.3.2 The remaining sites which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

Table C.6.1 Sites impact matrix for SA Objective 5 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
DLPBHH001	Residential	+	0	-
DLPBHH002	Residential	+	0	0
DLPBHH003	Residential	+	0	--
DLPBHH004	Residential	+	0	0
DLPBHH008	Residential	+	0	0
DLPBHH009	Residential	+	0	0
DLPBHH010	Residential	+	0	0
DLPBHPS1	Residential	+	0	--
DLPBHPS2	Residential	+	0	--
DLPDH2/DLPDH3/DLPDH4	Residential	+	0	--
DLPDH1	Residential	+	0	0
DLPDH5	Residential	+	0	0
DLPDH6	Residential	+	0	--
DLPDH7	Residential	+	0	--
DLPDH8	Residential	+	0	0
DLPDH9	Residential	+	0	0
DLPHH1	Residential	+	0	-
DLPHH2	Residential	+	0	-
DLPSH1	Residential	+	0	0
DLPSH2	Residential	--	0	--
DLPSH3	Residential	--	0	-
DLPSH4	Residential	+	0	--
DLPSH5	Residential	+	0	--
DLPSH6	Residential	+	0	-
DLPSH7	Residential	+	0	0
DLPH001	Residential	+	0	-
DLPH002	Residential	+	0	-
DLPH003	Residential	+	0	0
DLPH004	Residential	--	0	--
DLPH005	Residential	+	0	-
DLPH006	Residential	+	0	0
DLPH007	Residential	+	0	--
DLPH008	Residential	+	0	-
DLPH009	Residential	+	0	0
DLPH010	Residential	+	0	-
DLPH011	Residential	+	0	0
DLPH012	Residential	+	0	-
DLPH013	Residential	+	0	0
DLPH014	Residential	+	0	0
DLPH015/DLPH026	Residential	--	0	-
DLPH016	Residential	+	0	-
DLPH017	Residential	+	0	--
DLPH018	Residential	+	0	-
DLPH019	Residential	+	0	-

Site Reference	Site Use	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
DLPH020	Residential	+	0	0
DLPH021	Residential	+	0	0
DLPH022	Residential	+	0	--
DLPH023	Residential	+	0	-
DLPH024	Residential	+	0	-
DLPH025	Residential	+	0	-
DLPH027	Residential	+	0	-
DLPH028	Residential	+	0	0
DLPH029	Residential	+	0	0
DLPH030	Residential	+	0	-
DLPH031	Residential	+	0	-
DLPH032	Residential	+	0	--
DLPH033	Residential	+	0	-
DLPH034	Residential	+	0	-
DLPH035	Residential	+	0	0
DLPH036	Residential	+	0	-
DLPH037	Residential	+	0	-
DLPH038	Residential	+	0	--
DLPH039	Residential	+	0	0
DLPH040	Residential	+	0	-
DLPH041	Residential	+	0	0
DLPH042	Residential	+	0	--
DLPH043	Residential	+	0	0
DLPH044	Residential	+	0	0
DLPH045	Residential	+	0	0
DLPH046	Residential	+	0	-
DLPH047	Residential	+	0	0
DLPH048	Residential	+	0	-
DLPH049	Residential	+	0	-
DLPH050	Residential	+	0	-
DLPH051	Residential	+	0	0
DLPH052	Residential	+	0	-
DLPH053	Residential	+	0	--
DLPH054	Residential	+	0	-
DLPH055	Residential	+	0	--
DLPH056	Residential	+	0	--
DLPH057	Residential	+	0	-
DLPH058	Residential	+	0	-
DLPH059	Residential	+	0	0
DLPH060	Residential	+	0	0
DLPH061	Residential	+	0	-
DLPH062	Residential	+	0	-
DLPKQH1	Residential	+	0	--
SA002	Residential	+	0	-
SA003-H	Residential	+	0	0

Site Reference	Site Use	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
SA004	Residential	+	0	0
SA006	Residential	+	0	-
SA008	Residential	+	0	-
SA012	Residential	+	0	-
SA013	Residential	+	0	-
SA014	Residential	+	0	-
SA017	Residential	+	0	0
SA019	Residential	+	0	-
SA021	Residential	+	0	-
SA022	Residential	+	0	0
SA023	Residential	+	0	0
SA025	Residential	+	0	0
SA028	Residential	+	0	0
SA029	Residential	+	0	--
SA030	Residential	+	0	0
SA033	Residential	+	0	--
SA035	Residential	-	0	--
SA036-H	Residential	+	0	0
SA042	Residential	-	0	0
SA045	Residential	+	0	0
SA046	Residential	+	0	0
SA047-H	Residential	+	0	-
SA048	Residential	+	0	-
SA049	Residential	+	0	-
SA051	Residential	+	0	--
SA056	Residential	+	0	--
SA057	Residential	+	0	0
SA058	Residential	+	0	0
SA059-H	Residential	+	0	--
SA061	Residential	+	0	--
SA063	Residential	+	0	-
SA067	Residential	+	0	0
SA068	Residential	+	0	0
SA069	Residential	+	0	0
SA072-H	Residential	+	0	-
SA076	Residential	+	0	0
SA080	Residential	+	0	--
SA106	Residential	+	0	0
SA110	Residential	+	0	0
SA111	Residential	+	0	0
SA112	Residential	+	0	--
SA113	Residential	+	0	0
SA114	Residential	+	0	0
SA131	Residential	+	0	0
SA132	Residential	+	0	--

Site Reference	Site Use	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
SA133	Residential	+	0	0
SA134	Residential	+	0	--
SA135	Residential	+	0	--
SA136	Residential	+	0	--
DLPE01	Employment	+	0	-
DLPE02	Employment	+	0	-
DLPE03	Employment	+	0	0
DLPE04	Employment	+	0	--
DLPE05	Employment	+	0	-
DLPE06	Employment	+	0	0
DLPE07	Employment	+	--	-
DLPE08	Employment	+	0	-
DLPE09	Employment	+	0	0
DLPE10	Employment	+	0	0
DLPE11	Employment	+	0	-
DLPE12	Employment	+	0	-
DLPE13	Employment	+	0	-
SA003-E	Employment	+	0	0
SA036-E	Employment	+	0	0
SA044	Employment	+	0	0
SA047-E	Employment	+	0	-
SA059-E	Employment	+	0	--
SA070	Employment	+	0	-
SA072-E	Employment	+	0	-
SA078	Employment	+	0	--
SA079	Employment	+	0	0
SA081	Employment	+	0	0
SA082	Employment	+	0	0
SA083	Employment	+	0	--
SA084	Employment	+	0	-
SA085	Employment	+	0	-
SA086	Employment	+	0	0
SA087	Employment	+	0	--
SA088	Employment	+	0	0
SA089	Employment	+	0	0
SA090	Employment	+	0	-
SA091	Employment	+	0	--
SA092	Employment	+	0	--
DLPBHOS1	Mixed-Use (non-resi)	+	0	-
DLPBHOS2	Mixed-Use (non-resi)	+	0	-
DLPBHOS3	Mixed-use	+	0	-
DLPDOS1	Mixed-Use (non-resi)	+	0	0
DLPDOS2	Mixed-use	+	0	--
DLPDOS3	Mixed-use	+	0	0

Site Reference	Site Use	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
DLPDOS4	Mixed-use	+	0	0
DLPDPS1	Mixed-use	+	0	--
DLPDPS2	Mixed-use	+	0	-
DLPHOS1	Mixed-use	+	0	-
DLPHOS2	Mixed-use	--	0	-
DLPHOS3	Mixed-use	+	0	-
DLPHOS4	Mixed-use	+	0	-
DLPHOS5	Mixed-use	+	0	0
DLPSOS1	Mixed-use	--	0	--
DLPSOS2	Mixed-Use (non-resi)	--	0	--
DLPSOS3	Mixed-use	+	0	0
DLPH006/DLPH007	Mixed-use	+	0	--
DLPGT001	GTTS	+	0	0
DLPGT002	GTTS	--	--	0
DLPGT003	GTTS	--	0	--
DLPGT004	GTTS	--	--	-
DLPGT005	GTTS	+	0	-
DLPGT006	GTTS	--	0	0
SAGT007	GTTS	0	0	0
SAGT008	GTTS	0	0	-
SAGT009	GTTS	0	0	-
SAGT010	GTTS	0	0	-
SAGT011	GTTS	0	0	0
SAGT012	GTTS	0	0	-
SAGT013	GTTS	0	0	-
SAGT014	GTTS	0	0	-
SAGT015	GTTS	0	0	0
SAGT016	GTTS	0	0	0
SAGT017	GTTS	0	0	-
SAGT018	GTTS	0	0	--
SAGT019	GTTS	0	0	-
SAGT020	GTTS	0	0	-
SAGT021	GTTS	--	0	-

C.7 SA Objective 6: Natural Resources

C.7.1 Previously Undeveloped Land / Land with Environmental Value

- C.7.1.1 Dudley can be described as largely built-up with some areas of green space and other undeveloped land, including Green Belt, scattered throughout, particularly around the edges of the borough.
- C.7.1.2 79 sites in Dudley comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.
- C.7.1.3 The majority of sites in Dudley wholly or partially comprise undeveloped land and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at 132 sites would be expected to have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land.

C.7.2 Agricultural Land Classification

- C.7.2.1 In relation to Agricultural Land Classification (ALC) in Dudley, the majority of the borough's land is classed as 'Urban' and 'Non-Agricultural', with smaller areas of Grade 2, 3 and 4 land. Grades 2 and 3, which potentially represent some of the 'best and most versatile' (BMV) land within Dudley, are only found in small areas at the southern and western boundaries. Site SAGT020 and Site SA006 are located on Grade 3 land. Therefore, the proposed development at the sites would be expected to result in a loss of BMV land and result in a minor negative impact on natural resources.
- C.7.2.2 All 130 sites which either wholly or partially comprise previously undeveloped land are located upon areas of less agriculturally important Grade 4, 'Urban' and/or 'Non-Agricultural' land, and therefore, development in these areas could potentially have a minor positive impact on natural resources as the proposed development at these sites would help to prevent the loss of BMV land across the Plan area.
- C.7.2.3 The proposed development at the 79 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

Table C.7.1: Sites impact matrix for SA Objective 6 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
DLPBHH001	Residential	-	+
DLPBHH002	Residential	+	0
DLPBHH003	Residential	-	+
DLPBHH004	Residential	+	0
DLPBHH008	Residential	+	0
DLPBHH009	Residential	+	0
DLPBHH010	Residential	-	+
DLPBHPS1	Residential	-	+
DLPBHPS2	Residential	-	+
DLPDH2/DLPDH3/DLPDH4	Residential	+	0
DLPDH1	Residential	+	0
DLPDH5	Residential	+	0
DLPDH6	Residential	+	0
DLPDH7	Residential	+	0
DLPDH8	Residential	-	+
DLPDH9	Residential	+	0
DLPHH1	Residential	+	0
DLPHH2	Residential	+	0
DLPSH1	Residential	-	+
DLPSH2	Residential	-	+
DLPSH3	Residential	+	0
DLPSH4	Residential	+	0
DLPSH5	Residential	+	0
DLPSH6	Residential	+	0
DLPSH7	Residential	-	+
DLPH001	Residential	-	+
DLPH002	Residential	-	+
DLPH003	Residential	-	+
DLPH004	Residential	-	+
DLPH005	Residential	-	+
DLPH006	Residential	-	+
DLPH007	Residential	-	+
DLPH008	Residential	+	0
DLPH009	Residential	+	0
DLPH010	Residential	+	0
DLPH011	Residential	-	+
DLPH012	Residential	+	0
DLPH013	Residential	-	+
DLPH014	Residential	+	0
DLPH015/DLPH026	Residential	+	0
DLPH016	Residential	-	+
DLPH017	Residential	-	+
DLPH018	Residential	-	+

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
DLPH019	Residential	-	+
DLPH020	Residential	-	+
DLPH021	Residential	-	+
DLPH022	Residential	-	+
DLPH023	Residential	+	0
DLPH024	Residential	+	0
DLPH025	Residential	-	+
DLPH027	Residential	-	+
DLPH028	Residential	-	+
DLPH029	Residential	-	+
DLPH030	Residential	-	+
DLPH031	Residential	-	+
DLPH032	Residential	+	0
DLPH033	Residential	+	0
DLPH034	Residential	+	0
DLPH035	Residential	+	0
DLPH036	Residential	+	0
DLPH037	Residential	-	+
DLPH038	Residential	-	+
DLPH039	Residential	-	+
DLPH040	Residential	-	+
DLPH041	Residential	+	0
DLPH042	Residential	-	+
DLPH043	Residential	-	+
DLPH044	Residential	-	+
DLPH045	Residential	+	0
DLPH046	Residential	-	+
DLPH047	Residential	-	+
DLPH048	Residential	+	0
DLPH049	Residential	-	+
DLPH050	Residential	+	0
DLPH051	Residential	-	+
DLPH052	Residential	-	+
DLPH053	Residential	-	+
DLPH054	Residential	-	+
DLPH055	Residential	-	+
DLPH056	Residential	+	0
DLPH057	Residential	+	0
DLPH058	Residential	-	+
DLPH059	Residential	-	+
DLPH060	Residential	+	0
DLPH061	Residential	-	+
DLPH062	Residential	-	+
DLPKQH1	Residential	-	+
SA002	Residential	-	+

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
SA003-H	Residential	-	+
SA004	Residential	-	+
SA006	Residential	-	-
SA008	Residential	-	+
SA012	Residential	-	+
SA013	Residential	-	+
SA014	Residential	-	+
SA017	Residential	-	+
SA019	Residential	-	+
SA021	Residential	-	+
SA022	Residential	-	+
SA023	Residential	-	+
SA025	Residential	-	+
SA028	Residential	-	+
SA029	Residential	-	+
SA030	Residential	-	+
SA033	Residential	-	+
SA035	Residential	-	+
SA036-H	Residential	-	+
SA042	Residential	-	+
SA045	Residential	-	+
SA046	Residential	-	+
SA047-H	Residential	-	+
SA048	Residential	-	+
SA049	Residential	-	+
SA051	Residential	-	+
SA056	Residential	-	+
SA057	Residential	-	+
SA058	Residential	-	+
SA059-H	Residential	+	0
SA061	Residential	-	+
SA063	Residential	-	+
SA067	Residential	-	+
SA068	Residential	+	0
SA069	Residential	-	+
SA072-H	Residential	-	+
SA076	Residential	-	+
SA080	Residential	+	0
SA106	Residential	+	0
SA110	Residential	+	0
SA111	Residential	+	0
SA112	Residential	+	0
SA113	Residential	+	0
SA114	Residential	-	+
SA131	Residential	+	0

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
SA132	Residential	-	+
SA133	Residential	+	0
SA134	Residential	+	0
SA135	Residential	+	0
SA136	Residential	-	+
DLPE01	Employment	-	+
DLPE02	Employment	+	0
DLPE03	Employment	-	+
DLPE04	Employment	-	+
DLPE05	Employment	-	+
DLPE06	Employment	-	+
DLPE07	Employment	-	+
DLPE08	Employment	+	0
DLPE09	Employment	-	+
DLPE10	Employment	-	+
DLPE11	Employment	-	+
DLPE12	Employment	-	+
DLPE13	Employment	-	+
SA003-E	Employment	-	+
SA036-E	Employment	-	+
SA044	Employment	-	+
SA047-E	Employment	-	+
SA059-E	Employment	+	0
SA070	Employment	-	+
SA072-E	Employment	-	+
SA078	Employment	+	0
SA079	Employment	+	0
SA081	Employment	-	+
SA082	Employment	-	+
SA083	Employment	-	+
SA084	Employment	-	+
SA085	Employment	+	0
SA086	Employment	+	0
SA087	Employment	+	0
SA088	Employment	+	0
SA089	Employment	+	0
SA090	Employment	+	0
SA091	Employment	+	0
SA092	Employment	+	0
DLPBHOS1	Mixed-Use (non-resi)	-	+
DLPBHOS2	Mixed-Use (non-resi)	-	+
DLPBHOS3	Mixed-use	-	+
DLPDOS1	Mixed-Use (non-resi)	+	0
DLPDOS2	Mixed-use	+	0
DLPDOS3	Mixed-use	+	0

Site Reference	Site Use	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
DLPDOS4	Mixed-use	+	0
DLPDPS1	Mixed-use	+	0
DLPDPS2	Mixed-use	-	+
DLPHOS1	Mixed-use	+	0
DLPHOS2	Mixed-use	-	+
DLPHOS3	Mixed-use	+	0
DLPHOS4	Mixed-use	+	0
DLPHOS5	Mixed-use	+	0
DLPSOS1	Mixed-use	-	+
DLPSOS2	Mixed-Use (non-resi)	-	+
DLPSOS3	Mixed-use	+	0
DLPH006/DLPH007	Mixed-use	+	0
DLPGT001	GTTS	+	0
DLPGT002	GTTS	+	0
DLPGT003	GTTS	-	+
DLPGT004	GTTS	+	0
DLPGT005	GTTS	+	0
DLPGT006	GTTS	+	0
SAGT007	GTTS	+	0
SAGT008	GTTS	-	+
SAGT009	GTTS	-	+
SAGT010	GTTS	-	+
SAGT011	GTTS	-	+
SAGT012	GTTS	+	0
SAGT013	GTTS	-	+
SAGT014	GTTS	-	+
SAGT015	GTTS	-	+
SAGT016	GTTS	-	+
SAGT017	GTTS	-	+
SAGT018	GTTS	-	+
SAGT019	GTTS	-	+
SAGT020	GTTS	-	-
SAGT021	GTTS	-	+

C.8 SA Objective 7: Pollution

C.8.1 Air Quality Management Area

C.8.1.1 The entirety of Dudley is classed as 'Dudley Air Quality Management Area' (AQMA). All of the sites in Dudley are located wholly within this AQMA. Several sites are also located within 200m of neighbouring AQMAs including 'Birmingham AQMA' to the south east, 'Sandwell AQMA' to the east, 'Wolverhampton AQMA' to the north and 'Hagley AQMA' to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

C.8.2 Main Road

C.8.2.1 Many major roads pass through Dudley, including the A461, A4101, A4036 and the M5 Motorway which passes adjacent to the south eastern borough boundary. 125 sites are located partially or wholly within 200m of a main road, and therefore, the proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites.

C.8.2.2 On the other hand, the proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

C.8.3 Watercourse

C.8.3.1 There are several watercourses within Dudley, including the River Stour and various canals and brooks. 39 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites would be likely to increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

C.8.3.2 There are nine sites ('SA087', 'DLPHOS5', 'DLPSOS3', 'DLPH032', 'DLPGT010', 'GTTS7', 'DLPH049', 'SAGT010', 'SA008') identified as coinciding with the Dudley canal tunnels. It is uncertain if the development at these three sites would increase the risk of contamination of these watercourses.

C.8.3.3 The remaining sites are located beyond 10m of various watercourses. Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses, however each site would need to be evaluated according to land use type, size of development and exact location. The proposed development at all sites have the potential to lead to adverse impacts such as those resulting from runoff. At this

stage, the potential effects of all other sites on water quality are uncertain and would depend upon implementation.

C.8.4 Groundwater Source Protection Zone

C.8.4.1 Source Protection Zones (SPZs) for groundwater within Dudley are located to the west and south west of the borough and are grouped from 1 to 3 based on the level of protection that the groundwater requires. 27 sites in Dudley are located in SPZ 3. The proposed development at sites which partially or wholly coincide with an SPZ could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources.

C.8.4.2 The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

C.8.5 Potential Increase in Air Pollution

C.8.5.1 24 sites are proposed for the development of 100 or more dwellings. The proposed development at these 24 sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.

C.8.5.2 124 sites are proposed for the development of between ten and 99 dwellings, and 25 sites are proposed for non-residential end use and comprise between one and 10ha. Therefore, the proposed development at these 146 sites could potentially have a minor negative impact on air pollution in the local area.

C.8.5.3 Site DLPH056 is proposed for the development of less than ten dwellings, and 16 are proposed for non-residential end use and comprise less than 1ha. The proposed development at these 16 sites would be expected to have a negligible impact on local air pollution.

C.8.5.4 21 sites are proposed for GTTS use. The nature and design of pitches/plots which could be developed at each GTTS site is unknown at present. Therefore, potential increases in air pollution as a result of the construction and occupation of these 21 sites is uncertain.

Table C.8.1: Sites impact matrix for SA Objective 7 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
DLPBHH001	Residential	-	-	+/-	0	-
DLPBHH002	Residential	-	-	+/-	0	-
DLPBHH003	Residential	-	-	-	0	--
DLPBHH004	Residential	-	-	-	0	-
DLPBHH008	Residential	-	-	+/-	0	-
DLPBHH009	Residential	-	-	+/-	0	-
DLPBHH010	Residential	-	-	+/-	0	--
DLPBHPS1	Residential	-	-	+/-	0	--
DLPBHPS2	Residential	-	-	-	0	--
DLPDH2/DLPDH3/DLPDH4	Residential	-	0	+/-	0	-
DLPDH1	Residential	-	0	+/-	0	-
DLPDH5	Residential	-	-	+/-	0	-
DLPDH6	Residential	-	-	+/-	0	-
DLPDH7	Residential	-	-	+/-	0	-
DLPDH8	Residential	-	-	+/-	0	-
DLPDH9	Residential	-	0	+/-	0	-
DLPHH1	Residential	-	-	+/-	0	-
DLPHH2	Residential	-	-	-	0	-
DLPSH1	Residential	-	-	+/-	-	-
DLPSH2	Residential	-	-	-	-	-
DLPSH3	Residential	-	0	-	-	-
DLPSH4	Residential	-	-	+/-	-	-
DLPSH5	Residential	-	-	+/-	-	-
DLPSH6	Residential	-	-	+/-	0	-
DLPSH7	Residential	-	-	+/-	-	-
DLPH001	Residential	-	0	-	0	-
DLPH002	Residential	-	-	-	-	--
DLPH003	Residential	-	0	+/-	0	-
DLPH004	Residential	-	-	-	0	--
DLPH005	Residential	-	-	+/-	0	-
DLPH006	Residential	-	0	+/-	0	-
DLPH007	Residential	-	0	+/-	0	-
DLPH008	Residential	-	0	-	0	-
DLPH009	Residential	-	0	+/-	0	-
DLPH010	Residential	-	-	-	-	-
DLPH011	Residential	-	0	+/-	0	-
DLPH012	Residential	-	-	+/-	-	-
DLPH013	Residential	-	-	+/-	0	-
DLPH014	Residential	-	0	+/-	0	-
DLPH015/DLPH026	Residential	-	0	-	0	-
DLPH016	Residential	-	-	-	0	-
DLPH017	Residential	-	-	+/-	0	--

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
DLPH018	Residential	-	-	+/-	0	-
DLPH019	Residential	-	-	+/-	0	-
DLPH020	Residential	-	-	+/-	0	-
DLPH021	Residential	-	0	+/-	0	-
DLPH022	Residential	-	0	+/-	-	--
DLPH023	Residential	-	0	-	0	-
DLPH024	Residential	-	0	+/-	0	-
DLPH025	Residential	-	-	+/-	0	-
DLPH027	Residential	-	0	+/-	0	-
DLPH028	Residential	-	-	+/-	0	-
DLPH029	Residential	-	-	+/-	0	-
DLPH030	Residential	-	0	+/-	0	--
DLPH031	Residential	-	-	-	0	--
DLPH032	Residential	-	-	+/-	0	--
DLPH033	Residential	-	-	+/-	0	-
DLPH034	Residential	-	0	-	0	--
DLPH035	Residential	-	0	-	-	-
DLPH036	Residential	-	0	-	0	-
DLPH037	Residential	-	0	+/-	0	-
DLPH038	Residential	-	0	+/-	0	-
DLPH039	Residential	-	-	+/-	0	-
DLPH040	Residential	-	0	+/-	0	-
DLPH041	Residential	-	-	+/-	-	-
DLPH042	Residential	-	-	+/-	0	-
DLPH043	Residential	-	0	+/-	0	-
DLPH044	Residential	-	0	+/-	0	-
DLPH045	Residential	-	0	-	0	-
DLPH046	Residential	-	0	+/-	0	-
DLPH047	Residential	-	-	+/-	0	-
DLPH048	Residential	-	-	+/-	0	-
DLPH049	Residential	-	0	+/-	0	-
DLPH050	Residential	-	-	+/-	0	--
DLPH051	Residential	-	-	+/-	0	-
DLPH052	Residential	-	0	-	0	-
DLPH053	Residential	-	0	+/-	0	-
DLPH054	Residential	-	0	+/-	0	-
DLPH055	Residential	-	0	-	0	-
DLPH056	Residential	-	0	+/-	0	0
DLPH057	Residential	-	0	+/-	-	-
DLPH058	Residential	-	0	+/-	0	-
DLPH059	Residential	-	0	+/-	0	-
DLPH060	Residential	-	0	+/-	0	-
DLPH061	Residential	-	-	+/-	0	-
DLPH062	Residential	-	-	+/-	0	-

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
DLPKQH1	Residential	-	-	+/-	0	--
SA002	Residential	-	0	+/-	0	-
SA003-H	Residential	-	-	+/-	0	-
SA004	Residential	-	0	+/-	0	-
SA006	Residential	-	0	+/-	0	-
SA008	Residential	-	-	+/-	0	-
SA012	Residential	-	-	+/-	0	-
SA013	Residential	-	-	+/-	0	-
SA014	Residential	-	0	+/-	0	-
SA017	Residential	-	0	+/-	0	-
SA019	Residential	-	0	+/-	0	-
SA021	Residential	-	0	+/-	0	--
SA022	Residential	-	-	+/-	0	-
SA023	Residential	-	0	+/-	0	-
SA025	Residential	-	0	+/-	0	-
SA028	Residential	-	0	+/-	0	-
SA029	Residential	-	0	+/-	0	-
SA030	Residential	-	0	+/-	0	-
SA033	Residential	-	0	+/-	0	-
SA035	Residential	-	-	+/-	-	-
SA036-H	Residential	-	0	+/-	-	-
SA042	Residential	-	0	+/-	-	-
SA045	Residential	-	-	+/-	-	-
SA046	Residential	-	-	+/-	0	-
SA047-H	Residential	-	-	+/-	-	--
SA048	Residential	-	-	+/-	0	--
SA049	Residential	-	0	+/-	0	--
SA051	Residential	-	-	+/-	0	-
SA056	Residential	-	-	-	0	-
SA057	Residential	-	-	+/-	0	-
SA058	Residential	-	0	+/-	0	-
SA059-H	Residential	-	-	+/-	0	-
SA061	Residential	-	-	+/-	0	-
SA063	Residential	-	0	+/-	0	-
SA067	Residential	-	0	+/-	0	-
SA068	Residential	-	0	+/-	0	-
SA069	Residential	-	0	+/-	0	-
SA072-H	Residential	-	0	+/-	0	-
SA076	Residential	-	-	+/-	0	-
SA080	Residential	-	-	-	0	-
SA106	Residential	-	-	+/-	0	-
SA110	Residential	-	-	+/-	0	-
SA111	Residential	-	-	+/-	0	-
SA112	Residential	-	-	+/-	0	--

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
SA113	Residential	-	-	+/-	0	-
SA114	Residential	-	-	+/-	0	-
SA131	Residential	-	-	+/-	0	-
SA132	Residential	-	0	+/-	0	-
SA133	Residential	-	0	+/-	0	--
SA134	Residential	-	-	+/-	0	-
SA135	Residential	-	-	-	0	-
SA136	Residential	-	0	+/-	0	--
DLPE01	Employment	-	-	+/-	0	-
DLPE02	Employment	-	0	+/-	0	-
DLPE03	Employment	-	0	+/-	0	-
DLPE04	Employment	-	-	+/-	0	0
DLPE05	Employment	-	-	+/-	0	-
DLPE06	Employment	-	-	-	0	0
DLPE07	Employment	-	-	+/-	0	-
DLPE08	Employment	-	0	+/-	0	0
DLPE09	Employment	-	0	-	0	0
DLPE10	Employment	-	-	+/-	0	0
DLPE11	Employment	-	-	+/-	0	0
DLPE12	Employment	-	-	+/-	0	0
DLPE13	Employment	-	0	+/-	0	0
SA003-E	Employment	-	-	+/-	0	0
SA036-E	Employment	-	0	+/-	-	0
SA044	Employment	-	-	+/-	-	0
SA047-E	Employment	-	-	+/-	-	-
SA059-E	Employment	-	-	+/-	0	-
SA070	Employment	-	-	+/-	0	0
SA072-E	Employment	-	0	+/-	0	-
SA078	Employment	-	-	+/-	0	-
SA079	Employment	-	-	+/-	0	0
SA081	Employment	-	-	+/-	0	0
SA082	Employment	-	0	+/-	0	-
SA083	Employment	-	0	+/-	0	-
SA084	Employment	-	-	+/-	-	-
SA085	Employment	-	-	-	0	-
SA086	Employment	-	-	-	0	-
SA087	Employment	-	-	+/-	0	-
SA088	Employment	-	-	+/-	0	0
SA089	Employment	-	-	+/-	0	-
SA090	Employment	-	-	+/-	0	-
SA091	Employment	-	-	+/-	0	-
SA092	Employment	-	-	-	0	-
DLPBHOS1	Mixed-Use (non-resi)	-	-	+/-	0	-

Site Reference	Site Use	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
DLPBHOS2	Mixed-Use (non-resi)	-	0	-	0	-
DLPBHOS3	Mixed-use	-	-	+/-	0	-
DLPDOS1	Mixed-Use (non-resi)	-	-	+/-	0	0
DLPDOS2	Mixed-use	-	0	+/-	0	-
DLPDOS3	Mixed-use	-	-	+/-	0	-
DLPDOS4	Mixed-use	-	-	+/-	0	-
DLPDPS1	Mixed-use	-	-	+/-	0	--
DLPDPS2	Mixed-use	-	-	+/-	0	--
DLPHOS1	Mixed-use	-	-	+/-	0	-
DLPHOS2	Mixed-use	-	-	-	0	-
DLPHOS3	Mixed-use	-	-	+/-	0	-
DLPHOS4	Mixed-use	-	-	-	0	-
DLPHOS5	Mixed-use	-	-	+/-	0	-
DLPSOS1	Mixed-use	-	-	-	-	-
DLPSOS2	Mixed-Use (non-resi)	-	-	-	-	-
DLPSOS3	Mixed-use	-	-	+/-	-	-
DLPH006/DLPH007	Mixed-use	-	-	+/-	0	--
DLPGT001	GTTS	-	0	+/-	0	+/-
DLPGT002	GTTS	-	0	-	-	+/-
DLPGT003	GTTS	-	-	-	0	+/-
DLPGT004	GTTS	-	0	+/-	0	+/-
DLPGT005	GTTS	-	0	+/-	0	+/-
DLPGT006	GTTS	-	0	-	0	+/-
SAGT007	GTTS	-	-	+/-	0	+/-
SAGT008	GTTS	-	0	+/-	0	+/-
SAGT009	GTTS	-	0	+/-	0	+/-
SAGT010	GTTS	-	-	+/-	0	+/-
SAGT011	GTTS	-	-	+/-	0	+/-
SAGT012	GTTS	-	-	+/-	0	+/-
SAGT013	GTTS	-	0	+/-	0	+/-
SAGT014	GTTS	-	-	+/-	0	+/-
SAGT015	GTTS	-	-	+/-	0	+/-
SAGT016	GTTS	-	-	-	-	+/-
SAGT017	GTTS	-	-	+/-	0	+/-
SAGT018	GTTS	-	0	+/-	0	+/-
SAGT019	GTTS	-	-	+/-	0	+/-
SAGT020	GTTS	-	0	+/-	0	+/-
SAGT021	GTTS	-	0	-	0	+/-

C.9 SA Objective 8: Waste

C.9.1 Potential Increase in Household Waste Generation

- C.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. 133 sites are proposed for the development of 138 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- C.9.1.2 19 sites are proposed for the development of between 139 and 1,386 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.9.1.3 The waste likely to be generated as a result of non-residential development is uncertain. The nature and design of pitches/plots which could be developed at the GTTS sites is unknown at present and the waste generated from the employment led sites and non-residential mixed-use sites is also unknown. Therefore, potential increases in household waste generation as a result of the construction and occupation of these sites is also uncertain.
- C.9.1.4 Site DLPBHOS3 proposes "*residential institutions*" within Policy DLPBHOS3, and at the time of writing no residential capacity is provided. It is therefore unknown as to the extent of household waste likely to be generated at this site and the impact is uncertain.

Table C.9.1: Sites impact matrix for SA Objective 8 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Increase in household waste generation
DLPBHH001	Residential	0
DLPBHH002	Residential	0
DLPBHH003	Residential	-
DLPBHH004	Residential	0
DLPBHH008	Residential	0
DLPBHH009	Residential	0
DLPBHH010	Residential	0
DLPBHPS1	Residential	-
DLPBHPS2	Residential	-
DLPDH2/DLPDH3/DLPDH4	Residential	0
DLPDH1	Residential	0
DLPDH5	Residential	0
DLPDH6	Residential	0
DLPDH7	Residential	0
DLPDH8	Residential	0
DLPDH9	Residential	0
DLPHH1	Residential	0
DLPHH2	Residential	0
DLPSH1	Residential	0
DLPSH2	Residential	0
DLPSH3	Residential	0
DLPSH4	Residential	0
DLPSH5	Residential	0
DLPSH6	Residential	0
DLPSH7	Residential	0
DLPH001	Residential	0
DLPH002	Residential	-
DLPH003	Residential	0
DLPH004	Residential	-
DLPH005	Residential	0
DLPH006	Residential	0
DLPH007	Residential	0
DLPH008	Residential	0
DLPH009	Residential	0
DLPH010	Residential	0
DLPH011	Residential	0
DLPH012	Residential	0
DLPH013	Residential	0
DLPH014	Residential	0
DLPH015/DLPH026	Residential	0
DLPH016	Residential	0
DLPH017	Residential	-

Site Reference	Site Use	Increase in household waste generation
DLPH018	Residential	0
DLPH019	Residential	0
DLPH020	Residential	0
DLPH021	Residential	0
DLPH022	Residential	0
DLPH023	Residential	0
DLPH024	Residential	0
DLPH025	Residential	0
DLPH027	Residential	0
DLPH028	Residential	0
DLPH029	Residential	0
DLPH030	Residential	-
DLPH031	Residential	-
DLPH032	Residential	0
DLPH033	Residential	0
DLPH034	Residential	0
DLPH035	Residential	0
DLPH036	Residential	0
DLPH037	Residential	0
DLPH038	Residential	0
DLPH039	Residential	0
DLPH040	Residential	0
DLPH041	Residential	0
DLPH042	Residential	0
DLPH043	Residential	0
DLPH044	Residential	0
DLPH045	Residential	0
DLPH046	Residential	0
DLPH047	Residential	0
DLPH048	Residential	0
DLPH049	Residential	0
DLPH050	Residential	-
DLPH051	Residential	0
DLPH052	Residential	0
DLPH053	Residential	0
DLPH054	Residential	0
DLPH055	Residential	0
DLPH056	Residential	0
DLPH057	Residential	0
DLPH058	Residential	0
DLPH059	Residential	0
DLPH060	Residential	0
DLPH061	Residential	0

Site Reference	Site Use	Increase in household waste generation
DLPH062	Residential	0
DLPKQH1	Residential	-
SA002	Residential	0
SA003-H	Residential	0
SA004	Residential	0
SA006	Residential	0
SA008	Residential	0
SA012	Residential	0
SA013	Residential	0
SA014	Residential	0
SA017	Residential	0
SA019	Residential	0
SA021	Residential	-
SA022	Residential	0
SA023	Residential	0
SA025	Residential	0
SA028	Residential	0
SA029	Residential	0
SA030	Residential	0
SA033	Residential	0
SA035	Residential	0
SA036-H	Residential	0
SA042	Residential	0
SA045	Residential	0
SA046	Residential	0
SA047-H	Residential	-
SA048	Residential	-
SA049	Residential	-
SA051	Residential	0
SA056	Residential	0
SA057	Residential	0
SA058	Residential	0
SA059-H	Residential	0
SA061	Residential	0
SA063	Residential	0
SA067	Residential	0
SA068	Residential	0
SA069	Residential	0
SA072-H	Residential	0
SA076	Residential	0
SA080	Residential	0
SA106	Residential	0
SA110	Residential	0

Site Reference	Site Use	Increase in household waste generation
SA111	Residential	0
SA112	Residential	-
SA113	Residential	0
SA114	Residential	0
SA131	Residential	0
SA132	Residential	0
SA133	Residential	-
SA134	Residential	0
SA135	Residential	-
SA136	Residential	0
DLPE01	Employment	+/-
DLPE02	Employment	+/-
DLPE03	Employment	+/-
DLPE04	Employment	+/-
DLPE05	Employment	+/-
DLPE06	Employment	+/-
DLPE07	Employment	+/-
DLPE08	Employment	+/-
DLPE09	Employment	+/-
DLPE10	Employment	+/-
DLPE11	Employment	+/-
DLPE12	Employment	+/-
DLPE13	Employment	+/-
SA003-E	Employment	+/-
SA036-E	Employment	+/-
SA044	Employment	+/-
SA047-E	Employment	+/-
SA059-E	Employment	+/-
SA070	Employment	+/-
SA072-E	Employment	+/-
SA078	Employment	+/-
SA079	Employment	+/-
SA081	Employment	+/-
SA082	Employment	+/-
SA083	Employment	+/-
SA084	Employment	+/-
SA085	Employment	+/-
SA086	Employment	+/-
SA087	Employment	+/-
SA088	Employment	+/-
SA089	Employment	+/-
SA090	Employment	+/-
SA091	Employment	+/-

Site Reference	Site Use	Increase in household waste generation
SA092	Employment	+/-
DLPBHOS1	Mixed-Use (non-resi)	+/-
DLPBHOS2	Mixed-Use (non-resi)	+/-
DLPBHOS3	Mixed-use	+/-
DLPDOS1	Mixed-Use (non-resi)	+/-
DLPDOS2	Mixed-use	0
DLPDOS3	Mixed-use	0
DLPDOS4	Mixed-use	0
DLPDPS1	Mixed-use	0
DLPDPS2	Mixed-use	-
DLPHOS1	Mixed-use	0
DLPHOS2	Mixed-use	0
DLPHOS3	Mixed-use	0
DLPHOS4	Mixed-use	0
DLPHOS5	Mixed-use	0
DLPSOS1	Mixed-use	0
DLPSOS2	Mixed-Use (non-resi)	+/-
DLPSOS3	Mixed-use	0
DLPH006/DLPH007	Mixed-use	-
DLPGT001	GTTS	+/-
DLPGT002	GTTS	+/-
DLPGT003	GTTS	+/-
DLPGT004	GTTS	+/-
DLPGT005	GTTS	+/-
DLPGT006	GTTS	+/-
SAGT007	GTTS	+/-
SAGT008	GTTS	+/-
SAGT009	GTTS	+/-
SAGT010	GTTS	+/-
SAGT011	GTTS	+/-
SAGT012	GTTS	+/-
SAGT013	GTTS	+/-
SAGT014	GTTS	+/-
SAGT015	GTTS	+/-
SAGT016	GTTS	+/-
SAGT017	GTTS	+/-
SAGT018	GTTS	+/-
SAGT019	GTTS	+/-
SAGT020	GTTS	+/-
SAGT021	GTTS	+/-

C.10 SA Objective 9: Transport and Accessibility

C.10.1 Bus Stop

C.10.1.1 Throughout Dudley there are many bus stops, which would be expected to generally provide good public transport access to the local and wider community. However, some small areas of the borough would be likely to have more restricted access to bus services, particularly in the outskirts of the borough. Sites DLPGT005 and DLPGT002 are both located wholly outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to sustainable transport. On the other hand, the majority of proposed sites in Dudley are located amongst existing settlements and are within 400m of a bus stop; therefore, the proposed development at the remaining sites would be expected to have a minor positive impact on access to sustainable transport.

C.10.2 Railway Station

C.10.2.1 There are four railway stations located within the borough of Dudley: Stourbridge Town Station, Stourbridge Junction and Lye Station in the south, and Coseley Station in the north east. As such, sustainable access to railway stations in Dudley is generally restricted to the south of the borough with more limited access likely in the centre and north west. Approximately just over half of the proposed sites (117 in total) are situated wholly or partially outside of the sustainable distance of 2km from a railway station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services. The remaining 94 sites are located in the south or north east of Dudley, within 2km of a railway station, and are therefore identified as having a minor positive impact on access to rail services.

C.10.3 Pedestrian Access

C.10.3.1 Sites with good pedestrian access can be described as those with existing pavements or pathways which are segregated from traffic use in the area, which are found throughout the built-up areas of Dudley. The majority of sites in Dudley are well connected to the existing footpath networks, and therefore, the proposed development at these sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created. Conversely, 12 sites currently have poor access to the existing footpath network. Therefore, the proposed development at these 12 sites could potentially have a minor

negative impact on local accessibility, and pedestrian access to the wider community would need improvement to be considered a viable transport option.

C.10.4 Road Access

C.10.4.1 There are many major and minor roads which run through Dudley allowing for good transport and accessibility in the local area and nationally. Three sites have poor access to the existing road network, sites DLPE06, SA072-H, and SA072-E. These sites would provide users with poor access to the existing road network and would result in a minor negative impact on transport and accessibility. The remaining sites in Dudley have access to the existing road network, and therefore the proposed development at these sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

C.10.5 Pedestrian Access to Local Services

C.10.5.1 Sites with sustainable pedestrian access to local fresh food and services in Dudley are considered to be those within a 15-minute walking distance. Accessibility modelling data indicates the distribution of local services across Dudley, showing a total of 35 locations, which are generally found in existing centres with more sparse services found towards the outskirts. 36 sites are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure. 55 sites are identified to be within 15-minutes walking distance, and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to local services. 120 sites are identified to be within 10-minutes walking distance, and therefore, the proposed development at these sites would be expected to have a major positive impact on sustainable access to local services.

C.10.6 Public Transport Access to Local Services

C.10.6.1 Accessibility modelling data indicates that almost the entirety of the borough has good sustainable transport access to local fresh food and services, within a 15-minute travel time via public transport. All sites apart from sites DLPGT020, SA006, and SA132 meet this criterion and therefore these sites are assessed as having a minor negative impact on public transport access to local services. The proposed development at 26 sites could potentially have a minor positive impact on the access of site end users to local services due to their location within a 15-minute travel time; whereas the remaining 182 sites are located within a 10-minute travel time via public transport and could potentially have a major positive impact on the access of site end users to local services.

Table C.10.1: Sites impact matrix for SA Objective 9 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
DLPBHH001	Residential	+	-	+	+	++	++
DLPBHH002	Residential	+	-	+	+	++	++
DLPBHH003	Residential	+	-	+	+	++	++
DLPBHH004	Residential	+	-	+	+	++	++
DLPBHH008	Residential	+	-	+	+	++	++
DLPBHH009	Residential	+	-	+	+	++	++
DLPBHH010	Residential	+	-	+	+	++	++
DLPBHPS1	Residential	+	-	+	+	++	++
DLPBHPS2	Residential	+	-	+	+	++	++
DLPDH2/DLPDH3/DLPDH4	Residential	+	-	+	+	++	++
DLPDH1	Residential	+	-	+	+	++	++
DLPDH5	Residential	+	-	+	+	++	++
DLPDH6	Residential	+	-	+	+	++	++
DLPDH7	Residential	+	+	+	+	+	+
DLPDH8	Residential	+	-	+	+	++	++
DLPDH9	Residential	+	-	+	+	++	++
DLPHH1	Residential	+	-	+	+	++	++
DLPHH2	Residential	+	-	+	+	++	++
DLPSH1	Residential	+	+	+	+	++	++
DLPSH2	Residential	+	+	+	+	++	++
DLPSH3	Residential	+	+	+	+	++	++
DLPSH4	Residential	+	+	+	+	++	++
DLPSH5	Residential	+	+	+	+	++	++
DLPSH6	Residential	+	+	+	+	++	++
DLPSH7	Residential	+	+	+	+	++	++
DLPH001	Residential	+	-	+	+	-	++
DLPH002	Residential	+	+	+	+	+	+
DLPH003	Residential	+	+	+	+	++	++
DLPH004	Residential	+	+	-	+	++	++
DLPH005	Residential	+	+	+	+	++	++
DLPH006	Residential	+	-	+	+	+	++
DLPH007	Residential	+	+	+	+	+	+
DLPH008	Residential	+	+	+	+	-	+
DLPH009	Residential	+	+	+	+	++	++
DLPH010	Residential	+	-	+	+	++	++
DLPH011	Residential	+	-	+	+	-	++
DLPH012	Residential	+	+	+	+	++	+
DLPH013	Residential	+	+	+	+	+	+
DLPH014	Residential	+	+	+	+	+	++
DLPH015/DLPH026	Residential	+	+	+	+	++	++
DLPH016	Residential	+	+	+	+	++	++

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
DLPH017	Residential	+	+	+	+	++	++
DLPH018	Residential	+	-	+	+	-	++
DLPH019	Residential	+	+	+	+	+	++
DLPH020	Residential	+	-	+	+	+	++
DLPH021	Residential	+	-	+	+	-	++
DLPH022	Residential	+	-	+	+	+	++
DLPH023	Residential	+	+	+	+	++	++
DLPH024	Residential	+	+	+	+	+	++
DLPH025	Residential	+	-	+	+	++	++
DLPH027	Residential	+	+	+	+	+	+
DLPH028	Residential	+	+	+	+	++	++
DLPH029	Residential	+	+	+	+	++	++
DLPH030	Residential	+	-	-	+	-	++
DLPH031	Residential	+	+	+	+	+	++
DLPH032	Residential	+	-	+	+	+	++
DLPH033	Residential	+	-	+	+	+	++
DLPH034	Residential	+	+	+	+	++	++
DLPH035	Residential	+	+	-	+	+	+
DLPH036	Residential	+	-	+	+	-	++
DLPH037	Residential	+	+	+	+	+	++
DLPH038	Residential	+	+	+	+	-	+
DLPH039	Residential	+	+	+	+	++	++
DLPH040	Residential	+	+	+	+	-	+
DLPH041	Residential	+	-	+	+	++	++
DLPH042	Residential	+	+	+	+	++	++
DLPH043	Residential	+	+	+	+	++	++
DLPH044	Residential	+	+	+	+	++	+
DLPH045	Residential	+	-	+	+	++	++
DLPH046	Residential	+	+	-	+	+	+
DLPH047	Residential	+	-	+	+	++	++
DLPH048	Residential	+	-	+	+	+	++
DLPH049	Residential	+	-	+	+	+	++
DLPH050	Residential	+	-	+	+	++	++
DLPH051	Residential	+	-	+	+	++	++
DLPH052	Residential	+	-	+	+	+	++
DLPH053	Residential	+	-	+	+	-	++
DLPH054	Residential	+	-	+	+	++	++
DLPH055	Residential	+	+	+	+	-	++
DLPH056	Residential	+	-	+	+	++	++
DLPH057	Residential	+	-	+	+	+	++
DLPH058	Residential	+	+	+	+	-	++
DLPH059	Residential	+	+	+	+	-	+
DLPH060	Residential	+	-	+	+	+	+

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
DLPH061	Residential	+	-	+	+	+	+
DLPH062	Residential	+	+	+	+	++	++
DLPKQH1	Residential	+	-	+	+	-	++
SA002	Residential	+	+	+	+	++	+
SA003-H	Residential	+	+	+	+	-	++
SA004	Residential	+	-	+	+	+	++
SA006	Residential	+	-	+	+	-	-
SA008	Residential	+	-	+	+	+	++
SA012	Residential	+	+	+	+	++	++
SA013	Residential	+	+	+	+	++	++
SA014	Residential	+	+	+	+	++	++
SA017	Residential	+	+	+	+	++	++
SA019	Residential	+	+	+	+	-	+
SA021	Residential	+	-	+	+	-	++
SA022	Residential	+	-	+	+	++	+
SA023	Residential	+	-	+	+	+	+
SA025	Residential	+	-	+	+	++	++
SA028	Residential	+	+	+	+	-	++
SA029	Residential	+	-	+	+	-	++
SA030	Residential	+	-	+	+	++	++
SA033	Residential	+	-	+	+	++	++
SA035	Residential	+	+	+	+	++	+
SA036-H	Residential	+	+	+	+	++	++
SA042	Residential	+	-	+	+	++	++
SA045	Residential	+	-	+	+	++	++
SA046	Residential	+	-	+	+	++	++
SA047-H	Residential	+	-	+	+	++	++
SA048	Residential	+	+	+	+	-	++
SA049	Residential	+	+	+	+	+	++
SA051	Residential	+	-	+	+	+	++
SA056	Residential	+	-	+	+	++	++
SA057	Residential	+	-	+	+	++	++
SA058	Residential	+	-	+	+	-	++
SA059-H	Residential	+	+	+	+	++	++
SA061	Residential	+	+	+	+	+	++
SA063	Residential	+	-	+	+	-	++
SA067	Residential	+	+	+	+	+	++
SA068	Residential	+	-	+	+	+	++
SA069	Residential	+	-	+	+	++	++
SA072-H	Residential	+	-	-	-	+	++
SA076	Residential	+	-	+	+	++	++
SA080	Residential	+	+	+	+	+	++
SA106	Residential	+	+	+	+	++	++

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA110	Residential	+	-	+	+	++	++
SA111	Residential	+	-	+	+	++	++
SA112	Residential	+	+	+	+	++	++
SA113	Residential	+	+	+	+	++	++
SA114	Residential	+	+	+	+	++	++
SA131	Residential	+	-	+	+	++	++
SA132	Residential	+	-	+	+	++	-
SA133	Residential	+	+	+	+	++	++
SA134	Residential	+	+	+	+	++	++
SA135	Residential	+	-	+	+	+	++
SA136	Residential	+	-	+	+	++	++
DLPE01	Employment	+	+	+	+	+	++
DLPE02	Employment	+	-	+	+	+	++
DLPE03	Employment	+	-	+	+	-	++
DLPE04	Employment	+	-	+	+	+	++
DLPE05	Employment	+	-	+	+	-	-
DLPE06	Employment	+	+	-	-	-	++
DLPE07	Employment	+	+	-	+	-	++
DLPE08	Employment	+	+	+	+	++	++
DLPE09	Employment	+	+	+	+	-	-
DLPE10	Employment	+	-	+	+	-	-
DLPE11	Employment	+	-	+	+	+	++
DLPE12	Employment	+	+	+	+	+	++
DLPE13	Employment	+	-	+	+	-	++
SA003-E	Employment	+	+	+	+	-	++
SA036-E	Employment	+	+	+	+	++	++
SA044	Employment	+	+	+	+	++	++
SA047-E	Employment	+	-	+	+	++	++
SA059-E	Employment	+	+	+	+	++	++
SA070	Employment	+	+	+	+	+	++
SA072-E	Employment	+	-	-	-	+	++
SA078	Employment	+	+	+	+	++	++
SA079	Employment	+	-	+	+	++	++
SA081	Employment	+	-	+	+	++	++
SA082	Employment	+	+	+	+	+	++
SA083	Employment	+	-	+	+	+	++
SA084	Employment	+	+	+	+	++	++
SA085	Employment	+	+	+	+	++	++
SA086	Employment	+	-	+	+	+	++
SA087	Employment	+	-	+	+	+	++
SA088	Employment	+	-	+	+	++	++
SA089	Employment	+	-	+	+	++	++
SA090	Employment	+	+	+	+	-	++

Site Reference	Site Use	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
SA091	Employment	+	-	+	+	++	++
SA092	Employment	+	-	+	+	+	++
DLPBHOS1	Mixed-Use (non-resi)	+	-	+	+	++	++
DLPBHOS2	Mixed-Use (non-resi)	+	-	+	+	++	++
DLPBHOS3	Mixed-use	+	-	+	+	++	++
DLPDOS1	Mixed-Use (non-resi)	+	-	+	+	++	++
DLPDOS2	Mixed-use	+	-	+	+	++	++
DLPDOS3	Mixed-use	+	-	+	+	++	++
DLPDOS4	Mixed-use	+	-	+	+	++	++
DLPDPS1	Mixed-use	+	-	+	+	++	++
DLPDPS2	Mixed-use	+	-	+	+	++	++
DLPHOS1	Mixed-use	+	-	+	+	++	++
DLPHOS2	Mixed-use	+	-	+	+	++	++
DLPHOS3	Mixed-use	+	-	+	+	++	++
DLPHOS4	Mixed-use	+	-	+	+	++	++
DLPHOS5	Mixed-use	+	-	+	+	++	++
DLPSOS1	Mixed-use	+	+	+	+	++	++
DLPSOS2	Mixed-Use (non-resi)	+	+	+	+	++	++
DLPSOS3	Mixed-use	+	+	+	+	++	++
DLPH006/DLPH007	Mixed-use	+	-	+	+	++	++
DLPGT001	GTTS	+	+	+	+	+	++
DLPGT002	GTTS	-	-	-	+	+	++
DLPGT003	GTTS	+	+	+	+	++	++
DLPGT004	GTTS	+	-	-	+	-	++
DLPGT005	GTTS	-	-	-	+	-	++
DLPGT006	GTTS	+	+	+	+	+	++
SAGT007	GTTS	+	-	+	+	++	++
SAGT008	GTTS	+	+	+	+	-	+
SAGT009	GTTS	+	+	+	+	+	+
SAGT010	GTTS	+	-	+	+	+	++
SAGT011	GTTS	+	-	+	+	+	+
SAGT012	GTTS	+	-	+	+	++	++
SAGT013	GTTS	+	-	+	+	+	++
SAGT014	GTTS	+	+	+	+	++	++
SAGT015	GTTS	+	+	+	+	++	++
SAGT016	GTTS	+	+	+	+	++	++
SAGT017	GTTS	+	+	+	+	++	++
SAGT018	GTTS	+	+	+	+	+	++
SAGT019	GTTS	+	-	+	+	++	++
SAGT020	GTTS	+	-	+	+	-	-
SAGT021	GTTS	+	+	-	+	+	++

C.11 SA Objective 10: Housing

C.11.1 Housing Provision

- C.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites in Dudley proposed for residential use, or mixed use including residential, would therefore be expected to result in positive impacts under this objective. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision. This includes the majority of carried forward residential sites which are generally smaller sites within the existing urban area.
- C.11.1.2 However, the housing capacity of the pitch/plot capacity at all 21 of the GTTS sites is unknown at the time of writing; therefore, the impact of the proposed development at these sites is uncertain although it is likely there would be a net gain to some extent.
- C.11.1.3 Employment-led sites in Dudley would not be expected to result in a net change in housing provision and therefore a negligible impact has been identified for these sites.
- C.11.1.4 Site DLPBHOS3 proposes "*residential institutions*" within Policy DLPBHOS3, and at the time of writing no residential capacity is provided. It is likely that a net gain in housing would be expected to some extent despite having no indicative residential capacity.

Table C.11.1: Sites impact matrix for SA Objective 9 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Housing Provision
DLPBHH001	Residential	+
DLPBHH002	Residential	+
DLPBHH003	Residential	++
DLPBHH004	Residential	+
DLPBHH008	Residential	+
DLPBHH009	Residential	+
DLPBHH010	Residential	++
DLPBHPS1	Residential	++
DLPBHPS2	Residential	++
DLPDH2/DLPDH3/DLPDH4	Residential	+
DLPDH1	Residential	+
DLPDH5	Residential	+
DLPDH6	Residential	+
DLPDH7	Residential	+
DLPDH8	Residential	+
DLPDH9	Residential	+
DLPHH1	Residential	+
DLPHH2	Residential	+
DLPSH1	Residential	+
DLPSH2	Residential	+
DLPSH3	Residential	+
DLPSH4	Residential	+
DLPSH5	Residential	+
DLPSH6	Residential	+
DLPSH7	Residential	+
DLPH001	Residential	+
DLPH002	Residential	++
DLPH003	Residential	+
DLPH004	Residential	++
DLPH005	Residential	+
DLPH006	Residential	+
DLPH007	Residential	+
DLPH008	Residential	+
DLPH009	Residential	+
DLPH010	Residential	+
DLPH011	Residential	+
DLPH012	Residential	+
DLPH013	Residential	+
DLPH014	Residential	+
DLPH015/DLPH026	Residential	+
DLPH016	Residential	+
DLPH017	Residential	++
DLPH018	Residential	+
DLPH019	Residential	+

Site Reference	Site Use	Housing Provision
DLPH020	Residential	+
DLPH021	Residential	+
DLPH022	Residential	++
DLPH023	Residential	+
DLPH024	Residential	+
DLPH025	Residential	+
DLPH027	Residential	+
DLPH028	Residential	+
DLPH029	Residential	+
DLPH030	Residential	++
DLPH031	Residential	++
DLPH032	Residential	++
DLPH033	Residential	+
DLPH034	Residential	++
DLPH035	Residential	+
DLPH036	Residential	+
DLPH037	Residential	+
DLPH038	Residential	+
DLPH039	Residential	+
DLPH040	Residential	+
DLPH041	Residential	+
DLPH042	Residential	+
DLPH043	Residential	+
DLPH044	Residential	+
DLPH045	Residential	+
DLPH046	Residential	+
DLPH047	Residential	+
DLPH048	Residential	+
DLPH049	Residential	+
DLPH050	Residential	++
DLPH051	Residential	+
DLPH052	Residential	+
DLPH053	Residential	+
DLPH054	Residential	+
DLPH055	Residential	+
DLPH056	Residential	+
DLPH057	Residential	+
DLPH058	Residential	+
DLPH059	Residential	+
DLPH060	Residential	+
DLPH061	Residential	+
DLPH062	Residential	+
DLPKQH1	Residential	++
SA002	Residential	+
SA003-H	Residential	+
SA004	Residential	+

Site Reference	Site Use	Housing Provision
SA006	Residential	+
SA008	Residential	+
SA012	Residential	+
SA013	Residential	+
SA014	Residential	+
SA017	Residential	+
SA019	Residential	+
SA021	Residential	+
SA022	Residential	+
SA023	Residential	+
SA025	Residential	+
SA028	Residential	+
SA029	Residential	+
SA030	Residential	+
SA033	Residential	+
SA035	Residential	+
SA036-H	Residential	+
SA042	Residential	+
SA045	Residential	+
SA046	Residential	+
SA047-H	Residential	++
SA048	Residential	++
SA049	Residential	++
SA051	Residential	+
SA056	Residential	+
SA057	Residential	+
SA058	Residential	+
SA059-H	Residential	+
SA061	Residential	+
SA063	Residential	+
SA067	Residential	+
SA068	Residential	+
SA069	Residential	+
SA072-H	Residential	+
SA076	Residential	+
SA080	Residential	+
SA106	Residential	+
SA110	Residential	+
SA111	Residential	+
SA112	Residential	++
SA113	Residential	+
SA114	Residential	+
SA131	Residential	+
SA132	Residential	+
SA133	Residential	++
SA134	Residential	+

Site Reference	Site Use	Housing Provision
SA135	Residential	++
SA136	Residential	++
DLPE01	Employment	0
DLPE02	Employment	0
DLPE03	Employment	0
DLPE04	Employment	0
DLPE05	Employment	0
DLPE06	Employment	0
DLPE07	Employment	0
DLPE08	Employment	0
DLPE09	Employment	0
DLPE10	Employment	0
DLPE11	Employment	0
DLPE12	Employment	0
DLPE13	Employment	0
SA003-E	Employment	0
SA036-E	Employment	0
SA044	Employment	0
SA047-E	Employment	0
SA059-E	Employment	0
SA070	Employment	0
SA072-E	Employment	0
SA078	Employment	0
SA079	Employment	0
SA081	Employment	0
SA082	Employment	0
SA083	Employment	0
SA084	Employment	0
SA085	Employment	0
SA086	Employment	0
SA087	Employment	0
SA088	Employment	0
SA089	Employment	0
SA090	Employment	0
SA091	Employment	0
SA092	Employment	0
DLPBHOS1	Mixed-Use (non-resi)	0
DLPBHOS2	Mixed-Use (non-resi)	0
DLPBHOS3	Mixed-use	+
DLPDOS1	Mixed-Use (non-resi)	0
DLPDOS2	Mixed-use	+
DLPDOS3	Mixed-use	+
DLPDOS4	Mixed-use	+
DLPDPS1	Mixed-use	++
DLPDPS2	Mixed-use	++
DLPHOS1	Mixed-use	+

Site Reference	Site Use	Housing Provision
DLPHOS2	Mixed-use	+
DLPHOS3	Mixed-use	+
DLPHOS4	Mixed-use	+
DLPHOS5	Mixed-use	+
DLPSOS1	Mixed-use	+
DLPSOS2	Mixed-Use (non-resi)	0
DLPSOS3	Mixed-use	+
DLPH006/DLPH007	Mixed-use	++
DLPGT001	GTTS	+/-
DLPGT002	GTTS	+/-
DLPGT003	GTTS	+/-
DLPGT004	GTTS	+/-
DLPGT005	GTTS	+/-
DLPGT006	GTTS	+/-
SAGT007	GTTS	+/-
SAGT008	GTTS	+/-
SAGT009	GTTS	+/-
SAGT010	GTTS	+/-
SAGT011	GTTS	+/-
SAGT012	GTTS	+/-
SAGT013	GTTS	+/-
SAGT014	GTTS	+/-
SAGT015	GTTS	+/-
SAGT016	GTTS	+/-
SAGT017	GTTS	+/-
SAGT018	GTTS	+/-
SAGT019	GTTS	+/-
SAGT020	GTTS	+/-
SAGT021	GTTS	+/-

C.12 SA Objective 11: Equality

C.12.1 Index of Multiple Deprivation

- C.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England⁸. Out of 317 Local Authorities in England, Dudley is ranked as the 104th most deprived⁹. Overall deprivation is relatively high across the Black Country, with 22¹⁰ of the LSOAs in Dudley ranked among the 10% most deprived in England. Deprivation levels within the borough of Dudley varies from area to area, and generally the 10% most deprived areas are within the central and north eastern parts of the borough.
- C.12.1.2 72 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites may have a negligible impact on equality.
- C.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

⁸ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 14/08/23]

⁹ West Midlands Violence Reduction Unit (2021). Strategic Needs Assessment – Dudley. Available at: <https://westmidlands-vrp.org/app/uploads/2021/07/Strategic-Needs-Assessment-Dudley-WM-VRU.pdf> [Date accessed: 27/06/23]

¹⁰ Dudley Metropolitan Council (2019). Indices of Deprivation 2019 in Dudley. Available at: <https://www.allaboutdudley.info/wp-content/uploads/sites/2/2019/10/Indices-of-Deprivation-2019-Dudley-Borough.pdf> [Date accessed: 27/06/23]

Table C.12.1: Sites impact matrix for SA Objective 11 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	IMD 10% Most Deprived
DLPBHH001	Residential	0
DLPBHH002	Residential	-
DLPBHH003	Residential	0
DLPBHH004	Residential	0
DLPBHH008	Residential	-
DLPBHH009	Residential	0
DLPBHH010	Residential	0
DLPBHPS1	Residential	-
DLPBHPS2	Residential	0
DLPDH2/DLPDH3/DLPDH4	Residential	-
DLPDH1	Residential	-
DLPDH5	Residential	-
DLPDH6	Residential	-
DLPDH7	Residential	0
DLPDH8	Residential	-
DLPDH9	Residential	-
DLPHH1	Residential	-
DLPHH2	Residential	0
DLPSH1	Residential	0
DLPSH2	Residential	0
DLPSH3	Residential	0
DLPSH4	Residential	0
DLPSH5	Residential	0
DLPSH6	Residential	0
DLPSH7	Residential	0
DLPH001	Residential	0
DLPH002	Residential	0
DLPH003	Residential	0
DLPH004	Residential	-
DLPH005	Residential	-
DLPH006	Residential	0
DLPH007	Residential	0
DLPH008	Residential	0
DLPH009	Residential	0
DLPH010	Residential	0
DLPH011	Residential	-
DLPH012	Residential	0
DLPH013	Residential	0
DLPH014	Residential	0
DLPH015/DLPH026	Residential	0
DLPH016	Residential	0
DLPH017	Residential	0
DLPH018	Residential	0
DLPH019	Residential	0

Site Reference	Site Use	IMD 10% Most Deprived
DLPH020	Residential	-
DLPH021	Residential	0
DLPH022	Residential	0
DLPH023	Residential	0
DLPH024	Residential	0
DLPH025	Residential	-
DLPH027	Residential	0
DLPH028	Residential	0
DLPH029	Residential	0
DLPH030	Residential	0
DLPH031	Residential	-
DLPH032	Residential	-
DLPH033	Residential	0
DLPH034	Residential	-
DLPH035	Residential	0
DLPH036	Residential	0
DLPH037	Residential	0
DLPH038	Residential	0
DLPH039	Residential	0
DLPH040	Residential	0
DLPH041	Residential	0
DLPH042	Residential	0
DLPH043	Residential	0
DLPH044	Residential	0
DLPH045	Residential	0
DLPH046	Residential	0
DLPH047	Residential	0
DLPH048	Residential	0
DLPH049	Residential	-
DLPH050	Residential	-
DLPH051	Residential	-
DLPH052	Residential	-
DLPH053	Residential	0
DLPH054	Residential	-
DLPH055	Residential	0
DLPH056	Residential	0
DLPH057	Residential	0
DLPH058	Residential	0
DLPH059	Residential	0
DLPH060	Residential	0
DLPH061	Residential	0
DLPH062	Residential	0
DLPKQH1	Residential	0
SA002	Residential	0
SA003-H	Residential	0

Site Reference	Site Use	IMD 10% Most Deprived
SA004	Residential	-
SA006	Residential	0
SA008	Residential	-
SA012	Residential	0
SA013	Residential	0
SA014	Residential	-
SA017	Residential	0
SA019	Residential	0
SA021	Residential	0
SA022	Residential	0
SA023	Residential	0
SA025	Residential	0
SA028	Residential	0
SA029	Residential	-
SA030	Residential	-
SA033	Residential	0
SA035	Residential	0
SA036-H	Residential	0
SA042	Residential	0
SA045	Residential	0
SA046	Residential	-
SA047-H	Residential	0
SA048	Residential	0
SA049	Residential	-
SA051	Residential	-
SA056	Residential	0
SA057	Residential	-
SA058	Residential	0
SA059-H	Residential	-
SA061	Residential	-
SA063	Residential	0
SA067	Residential	0
SA068	Residential	0
SA069	Residential	-
SA072-H	Residential	-
SA076	Residential	-
SA080	Residential	0
SA106	Residential	-
SA110	Residential	0
SA111	Residential	-
SA112	Residential	-
SA113	Residential	-
SA114	Residential	-
SA131	Residential	-
SA132	Residential	0

Site Reference	Site Use	IMD 10% Most Deprived
SA133	Residential	0
SA134	Residential	0
SA135	Residential	0
SA136	Residential	-
DLPE01	Employment	-
DLPE02	Employment	-
DLPE03	Employment	0
DLPE04	Employment	-
DLPE05	Employment	0
DLPE06	Employment	0
DLPE07	Employment	-
DLPE08	Employment	0
DLPE09	Employment	0
DLPE10	Employment	-
DLPE11	Employment	0
DLPE12	Employment	0
DLPE13	Employment	0
SA003-E	Employment	0
SA036-E	Employment	0
SA044	Employment	0
SA047-E	Employment	0
SA059-E	Employment	-
SA070	Employment	0
SA072-E	Employment	-
SA078	Employment	0
SA079	Employment	0
SA081	Employment	-
SA082	Employment	0
SA083	Employment	0
SA084	Employment	0
SA085	Employment	0
SA086	Employment	0
SA087	Employment	-
SA088	Employment	0
SA089	Employment	-
SA090	Employment	0
SA091	Employment	-
SA092	Employment	0
DLPBHOS1	Mixed-Use (non-resi)	-
DLPBHOS2	Mixed-Use (non-resi)	-
DLPBHOS3	Mixed-use	0
DLPDOS1	Mixed-Use (non-resi)	0
DLPDOS2	Mixed-use	-
DLPDOS3	Mixed-use	-

Site Reference	Site Use	IMD 10% Most Deprived
DLPDOS4	Mixed-use	-
DLPDPS1	Mixed-use	-
DLPDPS2	Mixed-use	-
DLPHOS1	Mixed-use	0
DLPHOS2	Mixed-use	0
DLPHOS3	Mixed-use	0
DLPHOS4	Mixed-use	0
DLPHOS5	Mixed-use	0
DLPSOS1	Mixed-use	0
DLPSOS2	Mixed-Use (non-resi)	0
DLPSOS3	Mixed-use	0
DLPH006/DLPH007	Mixed-use	-
DLPGT001	GTTS	0
DLPGT002	GTTS	0
DLPGT003	GTTS	-
DLPGT004	GTTS	0
DLPGT005	GTTS	0
DLPGT006	GTTS	0
SAGT007	GTTS	-
SAGT008	GTTS	0
SAGT009	GTTS	-
SAGT010	GTTS	-
SAGT011	GTTS	0
SAGT012	GTTS	-
SAGT013	GTTS	-
SAGT014	GTTS	0
SAGT015	GTTS	0
SAGT016	GTTS	0
SAGT017	GTTS	-
SAGT018	GTTS	0
SAGT019	GTTS	-
SAGT020	GTTS	0
SAGT021	GTTS	-

C.13 SA Objective 12: Health

C.13.1 NHS Hospital with Accident & Emergency Department

C.13.1.1 Within Dudley, Russells Hall Hospital is the only NHS Hospital with an Accident & Emergency department, although there are several other hospitals within and surrounding the Black Country providing these services such as the Queen Elizabeth Hospital, approximately 4.7km to the south east of the borough. The majority of Dudley is within 5km of Russells Hall Hospital, although a proportion in the south of the borough lies outside of this distance and could potentially have more restricted sustainable access to emergency healthcare. 152 sites are located within 5km of Russells Hall Hospital and could therefore potentially have a minor positive impact on access to emergency healthcare due to being within a sustainable distance to the services. However, 59 sites in Dudley are located in the south or north eastern corner of the borough, over 5km from a hospital, and therefore the proposed development at these sites could potentially have a minor negative effect on access to emergency healthcare.

C.13.2 Pedestrian Access to GP Surgery

C.13.2.1 There are 55 GP Surgeries within Dudley and many others in the wider Black Country area, serving the existing local communities. Accessibility modelling data has been provided to Lepus by DMBC, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. A large proportion of the built-up areas are located within a 15-minute walk to a GP surgery, however, some areas are likely to have more restricted access, such as in the outskirts of the borough and the Green Belt, and some inner-city areas where existing development is mainly industrial/commercial.

C.13.2.2 29 sites in Dudley are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare, based on existing infrastructure. On the other hand, 71 sites in Dudley are located within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to healthcare. The remaining 111 sites in Dudley are located within a 10-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a major positive impact on access to healthcare.

C.13.3 Public Transport Access to GP Surgery

C.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey. Accessibility modelling data indicates that the majority of the borough falls within this distance, with the exception of an area to the south west of Stourbridge and small pockets elsewhere such as to the north of Merry Hill. The majority of sites

within Dudley are located in areas within this travel time to a GP surgery via public transport. The proposed development at 62 sites would be expected to have a minor positive impact on sustainable access to healthcare due to their location within a 15-minute journey, and 143 sites are located within a 10-minute public transport journey and would be expected to have a major positive impact on sustainable access to healthcare. However, six sites DLPH035, DLPBHPS1, DLPE05, DLPBHOS2, SA072-H, and SA072-E are located outside of a 15-minute public transport journey to a GP surgery, and therefore, the proposed development at these sites could potentially have a minor negative impact on sustainable access to healthcare.

C.13.4 Access to Greenspace

C.13.4.1 Greenspaces are distributed throughout the borough, including parks, allotments, playing fields and sports facilities. All sites in Dudley are located within 600m of one or more greenspaces. Therefore, a minor positive impact would be expected at these sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

C.13.5 Net Loss of Greenspace

C.13.5.1 16 sites coincide wholly or partially with greenspaces, including Site 'DLPH005' which wholly coincides with Christ Church greenspace, and Site 'DLPH049' located wholly within Dudley Leisure Centre greenspace. The proposed development at these sites could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

C.13.6 Public Right of Way / Cycle Path

C.13.6.1 All sites in Dudley are located within 600m of the PRoW and/or cycle network. The proposed development at these sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

Table C.13.1: Sites impact matrix for SA Objective 12 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
DLPBHH001	Residential	+	++	++	+	0	+
DLPBHH002	Residential	+	+	++	+	0	+
DLPBHH003	Residential	+	++	++	+	0	+
DLPBHH004	Residential	+	++	++	+	0	+
DLPBHH008	Residential	+	+	++	+	0	+
DLPBHH009	Residential	+	++	++	+	0	+
DLPBHH010	Residential	+	++	++	+	0	+
DLPBHP1	Residential	+	+	-	+	0	+
DLPBHP2	Residential	+	++	++	+	0	+
DLPDH2/DLPDH3/ DLPDH4	Residential	+	++	++	+	0	+
DLPDH1	Residential	+	++	++	+	0	+
DLPDH5	Residential	+	++	++	+	0	+
DLPDH6	Residential	+	++	++	+	0	+
DLPDH7	Residential	+	+	++	+	0	+
DLPDH8	Residential	+	++	++	+	0	+
DLPDH9	Residential	+	++	++	+	0	+
DLPDH1	Residential	-	++	++	+	0	+
DLPDH2	Residential	-	++	++	+	0	+
DLPDH3	Residential	-	++	+	+	0	+
DLPDH4	Residential	-	++	++	+	0	+
DLPDH5	Residential	-	+	++	+	0	+
DLPDH6	Residential	-	-	+	+	0	+
DLPDH7	Residential	-	++	+	+	0	+
DLPDH8	Residential	-	+	+	+	0	+
DLPDH9	Residential	+	+	+	+	0	+
DLPDH10	Residential	-	+	+	+	0	+
DLPDH11	Residential	-	++	++	+	0	+
DLPDH12	Residential	-	++	++	+	0	+
DLPDH13	Residential	-	+	++	+	0	+
DLPDH14	Residential	-	-	++	+	0	+
DLPDH15	Residential	-	+	+	+	0	+
DLPDH16	Residential	-	+	+	+	0	+
DLPDH17	Residential	-	++	++	+	0	+
DLPDH18	Residential	-	++	++	+	0	+
DLPDH19	Residential	-	++	++	+	0	+
DLPDH20	Residential	-	++	++	+	0	+
DLPDH21	Residential	-	++	++	+	0	+
DLPDH22	Residential	-	++	++	+	0	+
DLPDH23	Residential	-	++	++	+	0	+
DLPDH24	Residential	-	++	++	+	0	+
DLPDH25	Residential	-	++	++	+	0	+
DLPDH26	Residential	-	++	++	+	0	+
DLPDH27	Residential	-	++	++	+	0	+
DLPDH28	Residential	-	++	++	+	0	+
DLPDH29	Residential	-	++	++	+	0	+
DLPDH30	Residential	-	++	++	+	0	+
DLPDH31	Residential	-	++	++	+	0	+
DLPDH32	Residential	-	++	++	+	0	+
DLPDH33	Residential	-	++	++	+	0	+
DLPDH34	Residential	-	++	++	+	0	+
DLPDH35	Residential	-	++	++	+	0	+
DLPDH36	Residential	-	++	++	+	0	+
DLPDH37	Residential	-	++	++	+	0	+
DLPDH38	Residential	-	++	++	+	0	+
DLPDH39	Residential	-	++	++	+	0	+
DLPDH40	Residential	-	++	++	+	0	+
DLPDH41	Residential	-	++	++	+	0	+
DLPDH42	Residential	-	++	++	+	0	+
DLPDH43	Residential	-	++	++	+	0	+
DLPDH44	Residential	-	++	++	+	0	+
DLPDH45	Residential	-	++	++	+	0	+
DLPDH46	Residential	-	++	++	+	0	+
DLPDH47	Residential	-	++	++	+	0	+
DLPDH48	Residential	-	++	++	+	0	+
DLPDH49	Residential	-	++	++	+	0	+
DLPDH50	Residential	-	++	++	+	0	+
DLPDH51	Residential	-	++	++	+	0	+
DLPDH52	Residential	-	++	++	+	0	+
DLPDH53	Residential	-	++	++	+	0	+
DLPDH54	Residential	-	++	++	+	0	+
DLPDH55	Residential	-	++	++	+	0	+
DLPDH56	Residential	-	++	++	+	0	+
DLPDH57	Residential	-	++	++	+	0	+
DLPDH58	Residential	-	++	++	+	0	+
DLPDH59	Residential	-	++	++	+	0	+
DLPDH60	Residential	-	++	++	+	0	+
DLPDH61	Residential	-	++	++	+	0	+
DLPDH62	Residential	-	++	++	+	0	+
DLPDH63	Residential	-	++	++	+	0	+
DLPDH64	Residential	-	++	++	+	0	+
DLPDH65	Residential	-	++	++	+	0	+
DLPDH66	Residential	-	++	++	+	0	+
DLPDH67	Residential	-	++	++	+	0	+
DLPDH68	Residential	-	++	++	+	0	+
DLPDH69	Residential	-	++	++	+	0	+
DLPDH70	Residential	-	++	++	+	0	+
DLPDH71	Residential	-	++	++	+	0	+
DLPDH72	Residential	-	++	++	+	0	+
DLPDH73	Residential	-	++	++	+	0	+
DLPDH74	Residential	-	++	++	+	0	+
DLPDH75	Residential	-	++	++	+	0	+
DLPDH76	Residential	-	++	++	+	0	+
DLPDH77	Residential	-	++	++	+	0	+
DLPDH78	Residential	-	++	++	+	0	+
DLPDH79	Residential	-	++	++	+	0	+
DLPDH80	Residential	-	++	++	+	0	+
DLPDH81	Residential	-	++	++	+	0	+
DLPDH82	Residential	-	++	++	+	0	+
DLPDH83	Residential	-	++	++	+	0	+
DLPDH84	Residential	-	++	++	+	0	+
DLPDH85	Residential	-	++	++	+	0	+
DLPDH86	Residential	-	++	++	+	0	+
DLPDH87	Residential	-	++	++	+	0	+
DLPDH88	Residential	-	++	++	+	0	+
DLPDH89	Residential	-	++	++	+	0	+
DLPDH90	Residential	-	++	++	+	0	+
DLPDH91	Residential	-	++	++	+	0	+
DLPDH92	Residential	-	++	++	+	0	+
DLPDH93	Residential	-	++	++	+	0	+
DLPDH94	Residential	-	++	++	+	0	+
DLPDH95	Residential	-	++	++	+	0	+
DLPDH96	Residential	-	++	++	+	0	+
DLPDH97	Residential	-	++	++	+	0	+
DLPDH98	Residential	-	++	++	+	0	+
DLPDH99	Residential	-	++	++	+	0	+
DLPDH100	Residential	-	++	++	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
DLPH015/DLPH026	Residential	+	++	++	+	0	+
DLPH016	Residential	+	++	++	+	0	+
DLPH017	Residential	+	+	++	+	0	+
DLPH018	Residential	+	+	++	+	0	+
DLPH019	Residential	-	++	++	+	0	+
DLPH020	Residential	+	+	++	+	0	+
DLPH021	Residential	+	-	+	+	0	+
DLPH022	Residential	+	++	++	+	0	+
DLPH023	Residential	+	++	+	+	0	+
DLPH024	Residential	+	+	++	+	0	+
DLPH025	Residential	+	++	++	+	0	+
DLPH027	Residential	+	++	++	+	0	+
DLPH028	Residential	-	+	++	+	0	+
DLPH029	Residential	-	++	++	+	0	+
DLPH030	Residential	+	-	++	+	0	+
DLPH031	Residential	+	+	++	+	0	+
DLPH032	Residential	+	++	++	+	0	+
DLPH033	Residential	+	+	++	+	0	+
DLPH034	Residential	+	+	+	+	0	+
DLPH035	Residential	-	-	-	+	0	+
DLPH036	Residential	+	+	++	+	0	+
DLPH037	Residential	+	++	+	+	0	+
DLPH038	Residential	-	++	+	+	0	+
DLPH039	Residential	-	++	+	+	0	+
DLPH040	Residential	-	++	+	+	0	+
DLPH041	Residential	+	++	+	+	0	+
DLPH042	Residential	-	++	+	+	0	+
DLPH043	Residential	+	++	+	+	0	+
DLPH044	Residential	-	++	+	+	0	+
DLPH045	Residential	+	++	+	+	0	+
DLPH046	Residential	-	++	+	+	0	+
DLPH047	Residential	+	+	+	+	0	+
DLPH048	Residential	-	++	+	+	0	+
DLPH049	Residential	+	++	+	+	-	+
DLPH050	Residential	+	++	+	+	0	+
DLPH051	Residential	+	++	++	+	0	+
DLPH052	Residential	+	+	++	+	0	+
DLPH053	Residential	+	-	+	+	0	+
DLPH054	Residential	+	++	++	+	0	+
DLPH055	Residential	-	+	++	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
DLPH056	Residential	+	++	++	+	0	+
DLPH057	Residential	+	++	++	+	0	+
DLPH058	Residential	-	+	++	+	0	+
DLPH059	Residential	-	+	++	+	0	+
DLPH060	Residential	+	++	++	+	0	+
DLPH061	Residential	+	++	++	+	-	+
DLPH062	Residential	+	+	++	+	0	+
DLPKQH1	Residential	+	+	+	+	0	+
SA002	Residential	+	+	+	+	0	+
SA003-H	Residential	-	+	+	+	0	+
SA004	Residential	+	++	++	+	0	+
SA006	Residential	-	-	+	+	-	+
SA008	Residential	+	++	++	+	-	+
SA012	Residential	+	++	++	+	0	+
SA013	Residential	+	+	++	+	0	+
SA014	Residential	+	+	+	+	-	+
SA017	Residential	+	+	++	+	0	+
SA019	Residential	-	++	++	+	0	+
SA021	Residential	+	++	++	+	0	+
SA022	Residential	+	++	++	+	0	+
SA023	Residential	+	++	++	+	0	+
SA025	Residential	+	+	+	+	0	+
SA028	Residential	-	+	++	+	0	+
SA029	Residential	+	-	++	+	-	+
SA030	Residential	+	+	++	+	-	+
SA033	Residential	+	++	++	+	-	+
SA035	Residential	-	+	+	+	0	+
SA036-H	Residential	-	+	+	+	0	+
SA042	Residential	+	+	+	+	0	+
SA045	Residential	+	++	++	+	0	+
SA046	Residential	+	++	++	+	0	+
SA047-H	Residential	+	++	++	+	-	+
SA048	Residential	-	-	+	+	0	+
SA049	Residential	+	+	+	+	0	+
SA051	Residential	+	+	++	+	0	+
SA056	Residential	+	++	++	+	0	+
SA057	Residential	+	+	++	+	0	+
SA058	Residential	+	-	++	+	0	+
SA059-H	Residential	+	++	+	+	0	+
SA061	Residential	-	++	++	+	0	+
SA063	Residential	+	++	++	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA067	Residential	+	+	++	+	0	+
SA068	Residential	+	++	++	+	0	+
SA069	Residential	+	++	++	+	-	+
SA072-H	Residential	+	-	-	+	0	+
SA076	Residential	+	++	++	+	0	+
SA080	Residential	+	++	++	+	0	+
SA106	Residential	+	++	++	+	0	+
SA110	Residential	-	++	++	+	0	+
SA111	Residential	+	++	++	+	0	+
SA112	Residential	+	++	++	+	0	+
SA113	Residential	+	++	++	+	0	+
SA114	Residential	+	++	++	+	0	+
SA131	Residential	+	++	++	+	0	+
SA132	Residential	+	++	+	+	0	+
SA133	Residential	-	+	++	+	0	+
SA134	Residential	+	++	++	+	0	+
SA135	Residential	+	+	+	+	0	+
SA136	Residential	+	+	++	+	0	+
DLPE01	Employment	+	+	++	+	0	+
DLPE02	Employment	+	+	++	+	0	+
DLPE03	Employment	+	-	++	+	0	+
DLPE04	Employment	+	-	++	+	0	+
DLPE05	Employment	+	-	-	+	0	+
DLPE06	Employment	-	-	+	+	0	+
DLPE07	Employment	+	-	++	+	0	+
DLPE08	Employment	+	+	++	+	0	+
DLPE09	Employment	-	-	+	+	0	+
DLPE10	Employment	+	+	+	+	0	+
DLPE11	Employment	+	+	++	+	0	+
DLPE12	Employment	+	+	++	+	0	+
DLPE13	Employment	+	-	++	+	0	+
SA003-E	Employment	-	+	+	+	0	+
SA036-E	Employment	-	+	+	+	0	+
SA044	Employment	-	++	+	+	0	+
SA047-E	Employment	+	++	++	+	-	+
SA059-E	Employment	+	++	+	+	0	+
SA070	Employment	-	++	++	+	0	+
SA072-E	Employment	+	-	-	+	0	+
SA078	Employment	+	++	++	+	0	+
SA079	Employment	+	++	++	+	0	+
SA081	Employment	+	-	++	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SA082	Employment	+	++	++	+	0	+
SA083	Employment	+	++	++	+	0	+
SA084	Employment	+	+	+	+	0	+
SA085	Employment	+	-	++	+	0	+
SA086	Employment	+	+	+	+	0	+
SA087	Employment	+	++	++	+	0	+
SA088	Employment	+	++	++	+	0	+
SA089	Employment	+	++	++	+	0	+
SA090	Employment	-	-	+	+	0	+
SA091	Employment	+	+	++	+	0	+
SA092	Employment	+	+	+	+	0	+
DLPBHOS1	Mixed-Use (non-resi)	+	++	++	+	0	+
DLPBHOS2	Mixed-Use (non-resi)	+	+	-	+	0	+
DLPBHOS3	Mixed-use	+	++	++	+	0	+
DLPDOS1	Mixed-Use (non-resi)	+	++	++	+	0	+
DLPDOS2	Mixed-use	+	++	++	+	0	+
DLPDOS3	Mixed-use	+	++	++	+	0	+
DLPDOS4	Mixed-use	+	++	++	+	0	+
DLPDPS1	Mixed-use	+	++	+	+	-	+
DLPDPS2	Mixed-use	+	++	++	+	0	+
DLPHOS1	Mixed-use	-	++	++	+	0	+
DLPHOS2	Mixed-use	-	++	++	+	0	+
DLPHOS3	Mixed-use	-	++	++	+	0	+
DLPHOS4	Mixed-use	-	++	++	+	0	+
DLPHOS5	Mixed-use	-	++	++	+	0	+
DLPSOS1	Mixed-use	-	-	++	+	0	+
DLPSOS2	Mixed-Use (non-resi)	-	+	+	+	0	+
DLPSOS3	Mixed-use	-	+	+	+	0	+
DLPH006/ DLPH007	Mixed-use	+	-	++	+	0	+
DLPGT001	GTTS	+	+	++	+	0	+
DLPGT002	GTTS	+	-	+	+	0	+
DLPGT003	GTTS	+	+	++	+	0	+
DLPGT004	GTTS	+	+	++	+	0	+
DLPGT005	GTTS	+	-	++	+	0	+
DLPGT006	GTTS	+	+	+	+	0	+
SAGT007	GTTS	+	+	++	+	0	+
SAGT008	GTTS	-	++	++	+	0	+
SAGT009	GTTS	+	+	+	+	0	+

Site Reference	Site Use	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
SAGT010	GTTS	+	++	++	+	-	+
SAGT011	GTTS	+	-	+	+	0	+
SAGT012	GTTS	+	+	++	+	0	+
SAGT013	GTTS	+	++	++	+	0	+
SAGT014	GTTS	+	++	++	+	0	+
SAGT015	GTTS	-	++	+	+	0	+
SAGT016	GTTS	-	-	+	+	0	+
SAGT017	GTTS	+	++	++	+	0	+
SAGT018	GTTS	+	++	++	+	0	+
SAGT019	GTTS	+	++	++	+	-	+
SAGT020	GTTS	-	-	+	+	-	+
SAGT021	GTTS	+	+	++	+	0	+

C.14 SA Objective 13: Economy

C.14.1 Employment Floorspace Provision

- C.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- C.14.1.2 There are 34 sites in Dudley which are proposed for employment use and 18 sites proposed for mixed-use. Of the 34 Employment sites 15 comprise areas of undeveloped land; therefore, the proposed development at these 15 sites would be expected to result in a net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Site DLPH05 resides on a car park that would to some extent expect a net gain in employment floorspace and has therefore been assessed as having a major positive impact on providing employment floorspace. The remaining 19 employment sites and 17 of the mixed-use sites reside on employment land and at this stage it is uncertain whether the proposed development would result in a net change in employment floorspace.
- C.14.1.3 60 sites proposed for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at 43 of these sites could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at 17 of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.
- C.14.1.4 The remaining 99 sites are located on previously undeveloped land or derelict land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

C.14.2 Pedestrian Access to Employment Opportunities

- C.14.2.1 There is a range of employment opportunities currently within Dudley, with over 100 key employment locations identified. Accessibility modelling data has been provided to Lepus by DMBC, mapping key employment locations and areas within a sustainable travel time. According to the modelling data, almost the entirety of the borough is within a 30-minute walk to an employment location, however, some small areas at the southern boundary are likely to have more restricted access for pedestrians. 173 residential-led sites including all residential, mixed-use and GTTS sites in Dudley are located within a 30-minute walk to an employment location, where 165 sites are located within a 20-minute walk and could potentially have a major positive impact on pedestrian access to employment and the

remaining eight located within a 30-minute walk and could potentially have a minor positive impact on pedestrian access to an employment location.

C.14.3 Public Transport Access to Employment Opportunities

- C.14.3.1 Accessibility modelling data indicates that the majority of the borough is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. Public transport provision within Dudley is widespread, with only a small proportion of the borough in the south outside of this distance.
- C.14.3.2 All 173 residential-led sites are located within a sustainable distance to employment opportunities, including all residential, mixed-use and GTTS sites. There are 159 residential-led sites located within a 20-minute journey from an employment opportunity, and so the proposed development at these sites would be expected to have a major positive impact on access to employment opportunities. There are 14 residential-led sites located within a 30-minute journey from an employment opportunity and so the proposed development would be expected to have a minor positive impact on access to employment opportunities.

Table C.14.1: Sites impact matrix for SA Objective 13 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Employment Floorpace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
DLPBHH001	Residential	-	++	++
DLPBHH002	Residential	0	++	++
DLPBHH003	Residential	--	++	++
DLPBHH004	Residential	--	++	++
DLPBHH008	Residential	-	++	++
DLPBHH009	Residential	-	++	++
DLPBHH010	Residential	-	++	++
DLPBHPS1	Residential	0	++	++
DLPBHPS2	Residential	0	++	++
DLPDH2/DLPDH3/DLPDH4	Residential	--	++	++
DLPDH1	Residential	0	++	++
DLPDH5	Residential	-	++	++
DLPDH6	Residential	0	++	++
DLPDH7	Residential	-	++	++
DLPDH8	Residential	0	++	++
DLPDH9	Residential	-	++	++
DLPHH1	Residential	-	++	++
DLPHH2	Residential	-	++	++
DLPSH1	Residential	0	++	++
DLPSH2	Residential	-	++	++
DLPSH3	Residential	-	++	++
DLPSH4	Residential	-	++	++
DLPSH5	Residential	-	++	++
DLPSH6	Residential	-	++	++
DLPSH7	Residential	0	++	++
DLPH001	Residential	0	++	++
DLPH002	Residential	0	++	++
DLPH003	Residential	0	++	++
DLPH004	Residential	0	++	++
DLPH005	Residential	0	++	++
DLPH006	Residential	0	++	++
DLPH007	Residential	0	+	+
DLPH008	Residential	0	++	++
DLPH009	Residential	-	++	++
DLPH010	Residential	-	++	++
DLPH011	Residential	--	++	++
DLPH012	Residential	-	++	++
DLPH013	Residential	-	++	++
DLPH014	Residential	-	++	++
DLPH015/DLPH026	Residential	-	++	++
DLPH016	Residential	-	++	++

Site Reference	Site Use	Employment Floorpace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
DLPH017	Residential	--	++	++
DLPH018	Residential	0	++	++
DLPH019	Residential	-	++	++
DLPH020	Residential	-	++	++
DLPH021	Residential	0	+	++
DLPH022	Residential	-	++	+
DLPH023	Residential	-	++	++
DLPH024	Residential	--	++	++
DLPH025	Residential	0	++	++
DLPH027	Residential	0	++	++
DLPH028	Residential	0	++	++
DLPH029	Residential	0	++	++
DLPH030	Residential	-	++	++
DLPH031	Residential	0	++	++
DLPH032	Residential	--	++	++
DLPH033	Residential	--	++	++
DLPH034	Residential	--	++	++
DLPH035	Residential	-	++	++
DLPH036	Residential	--	++	++
DLPH037	Residential	0	+	+
DLPH038	Residential	0	++	+
DLPH039	Residential	0	++	+
DLPH040	Residential	0	++	+
DLPH041	Residential	-	++	+
DLPH042	Residential	0	++	++
DLPH043	Residential	0	++	++
DLPH044	Residential	0	++	++
DLPH045	Residential	0	++	++
DLPH046	Residential	0	++	+
DLPH047	Residential	0	++	++
DLPH048	Residential	--	++	+
DLPH049	Residential	--	++	++
DLPH050	Residential	--	++	++
DLPH051	Residential	0	++	++
DLPH052	Residential	0	++	++
DLPH053	Residential	0	++	++
DLPH054	Residential	0	++	++
DLPH055	Residential	0	++	++
DLPH056	Residential	0	+	++
DLPH057	Residential	-	++	+
DLPH058	Residential	0	++	++
DLPH059	Residential	0	++	++

Site Reference	Site Use	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
DLPH060	Residential	-	++	+
DLPH061	Residential	0	++	++
DLPH062	Residential	-	++	++
DLPKQH1	Residential	0	++	++
SA002	Residential	0	++	++
SA003-H	Residential	0	++	++
SA004	Residential	0	++	++
SA006	Residential	0	+	+
SA008	Residential	0	++	++
SA012	Residential	0	++	++
SA013	Residential	0	++	++
SA014	Residential	0	++	++
SA017	Residential	0	++	++
SA019	Residential	0	++	++
SA021	Residential	0	++	++
SA022	Residential	0	++	++
SA023	Residential	0	++	++
SA025	Residential	0	++	++
SA028	Residential	0	+	++
SA029	Residential	0	++	++
SA030	Residential	0	++	++
SA033	Residential	0	++	++
SA035	Residential	0	++	++
SA036-H	Residential	0	++	++
SA042	Residential	0	++	++
SA045	Residential	0	++	++
SA046	Residential	0	++	++
SA047-H	Residential	-0	++	++
SA048	Residential	0	++	++
SA049	Residential	0	++	++
SA051	Residential	0	++	++
SA056	Residential	0	++	++
SA057	Residential	-	++	++
SA058	Residential	0	++	++
SA059-H	Residential	--	++	++
SA061	Residential	0	++	++
SA063	Residential	0	++	++
SA067	Residential	0	++	++
SA068	Residential	-	++	++
SA069	Residential	0	++	++
SA072-H	Residential	0	++	++
SA076	Residential	0	++	++

Site Reference	Site Use	Employment Floorpace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA080	Residential	0	++	++
SA106	Residential	--	++	++
SA110	Residential	-	++	++
SA111	Residential	-	++	++
SA112	Residential	--	++	++
SA113	Residential	-	++	++
SA114	Residential	-	++	++
SA131	Residential	-	++	++
SA132	Residential	0	++	++
SA133	Residential	-	++	++
SA134	Residential	-	++	++
SA135	Residential	-	++	++
SA136	Residential	--	++	++
DLPE01	Employment	++	0	0
DLPE02	Employment	++	0	0
DLPE03	Employment	++	0	0
DLPE04	Employment	++	0	0
DLPE05	Employment	++	0	0
DLPE06	Employment	++	0	0
DLPE07	Employment	++	0	0
DLPE08	Employment	++	0	0
DLPE09	Employment	+/-	0	0
DLPE10	Employment	+/-	0	0
DLPE11	Employment	+/-	0	0
DLPE12	Employment	++	0	0
DLPE13	Employment	++	0	0
SA003-E	Employment	++	0	0
SA036-E	Employment	++	0	0
SA044	Employment	++	0	0
SA047-E	Employment	+/-	0	0
SA059-E	Employment	+/-	0	0
SA070	Employment	++	0	0
SA072-E	Employment	++	0	0
SA078	Employment	+/-	0	0
SA079	Employment	+/-	0	0
SA081	Employment	+/-	0	0
SA082	Employment	+/-	0	0
SA083	Employment	+/-	0	0
SA084	Employment	+/-	0	0
SA085	Employment	+/-	0	0
SA086	Employment	+/-	0	0
SA087	Employment	+/-	0	0

Site Reference	Site Use	Employment Floorpace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SA088	Employment	+/-	0	0
SA089	Employment	+/-	0	0
SA090	Employment	+/-	0	0
SA091	Employment	+/-	0	0
SA092	Employment	+/-	++	++
DLPBHOS1	Mixed-Use (non-resi)	+/-	0	0
DLPBHOS2	Mixed-Use (non-resi)	+/-	0	0
DLPBHOS3	Mixed-use	+/-	++	++
DLPDOS1	Mixed-Use (non-resi)	+/-	0	0
DLPDOS2	Mixed-use	+/-	++	++
DLPDOS3	Mixed-use	+/-	++	++
DLPDOS4	Mixed-use	+/-	++	++
DLPDPS1	Mixed-use	+/-	++	++
DLPDPS2	Mixed-use	+/-	++	++
DLPHOS1	Mixed-use	+/-	++	++
DLPHOS2	Mixed-use	+/-	++	++
DLPHOS3	Mixed-use	+/-	++	++
DLPHOS4	Mixed-use	+/-	++	++
DLPHOS5	Mixed-use	++	++	++
DLPSOS1	Mixed-use	+/-	++	++
DLPSOS2	Mixed-Use (non-resi)	+/-	0	0
DLPSOS3	Mixed-use	+/-	++	++
DLPH006/DLPH007	Mixed-use	+/-	++	++
DLPGT001	GTTS	0	++	++
DLPGT002	GTTS	0	++	++
DLPGT003	GTTS	0	++	++
DLPGT004	GTTS	0	++	++
DLPGT005	GTTS	0	++	++
DLPGT006	GTTS	0	+	+
SAGT007	GTTS	0	++	++
SAGT008	GTTS	0	++	++
SAGT009	GTTS	0	++	++
SAGT010	GTTS	0	++	++
SAGT011	GTTS	0	++	++
SAGT012	GTTS	-	++	++
SAGT013	GTTS	0	++	++
SAGT014	GTTS	0	++	++
SAGT015	GTTS	0	++	++
SAGT016	GTTS	0	++	++
SAGT017	GTTS	0	++	++

Site Reference	Site Use	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
SAGT018	GTTS	0	++	++
SAGT019	GTTS	0	++	++
SAGT020	GTTS	0	+	+
SAGT021	GTTS	0	++	++

C.15 SA Objective 14: Education, Skills and Training

C.15.1 Pedestrian Access to Primary School

C.15.1.1 Accessibility modelling data has been provided to Lepus by DMBC, mapping the location of primary schools and areas within a sustainable travel time to these schools. There are a total of 80 primary schools within Dudley. The majority of the built-up areas are located within a 15-minute walk to a primary school, however, some areas are likely to have more restricted access, such as areas in the south and a small proportion of the centre of the borough, where a narrow corridor running from the centre to the north west is located outside of a 15-minute walk.

C.15.1.2 There are 12 sites proposed for residential-led use (including mixed use and GTTS) site that are located either entirely or partly outside of a 15-minute walk to a primary school. Therefore, the proposed development at these sites could potentially have a minor negative impact on access to primary schools due to the likely increased reliance on less sustainable travel methods. These 12 sites are located in two areas that are separated by one mile in distance, located in the centre of the borough and slightly to the west.

C.15.1.3 On the other hand, 161 residential-led sites are located within a 15-minute walking distance to a primary school. 84 of these sites are located within a 10-minute walking distance, therefore, the proposed development at these sites would be expected have a major positive impact on pedestrian access to primary schools. The remaining 77 sites are located within a 15-minute walking distance and would be expected to have a minor positive impact on pedestrian access to primary schools.

C.15.2 Pedestrian Access to Secondary School

C.15.2.1 Accessibility modelling data has been provided to Lepus by DMBC, mapping the location of secondary schools and areas within a sustainable travel time to these schools. There are 18 secondary schools within Dudley, the majority of which are located within the more built-up areas of the borough, and therefore, sites within existing settlements are likely to have better pedestrian access compared to the outskirts of settlements or Green Belt.

C.15.2.2 33 of the residential-led use sites in Dudley are situated in the areas of the borough outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education.

C.15.2.3 Conversely, 140 residential-led sites in Dudley are within a 25-minute walk to a secondary school, and therefore, the proposed development at these sites could be expected to

encourage pedestrian access to secondary schools. 101 of these sites are located within a 20-minute walk, and therefore, the proposed development at these sites would be expected to have a major positive impact on access to secondary schools. 39 sites are located within a 25-minute walk, and therefore, the proposed development at these sites would be expected to have a minor positive impact on access to secondary schools.

C.15.3 Public Transport Access to Secondary School

- C.15.3.1 Existing public transport provision within Dudley is widespread and would be expected to provide the majority of residents with good access to the local and wider area. Accessibility modelling data indicates only localised pockets of the borough where public transport access to secondary schools is limited.
- C.15.3.2 The majority of proposed residential-led sites are located within a 25-minute public transport journey to a secondary school, with 132 located within a 20-minute public transport journey, and therefore, the proposed development at these sites would be expected to have a major positive impact on access to secondary schools. The remaining 27 sites are located within 25-minutes via public transport to secondary schools, and therefore, the proposed development at these sites would be expected to have a minor positive impact on access to secondary schools.
- C.15.3.3 However, 14 sites are located over a 25-minute travel time to a secondary school, and therefore, the proposed development at these sites could potentially have a minor negative impact on new residents' access to education, based on current infrastructure. These sites are generally located in the north east corner of the borough and the south east of the borough.

Table C.15.1: Sites impact matrix for SA Objective 14 – Dudley Reasonable Alternative Sites

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
DLPBHH001	Residential	++	+	++
DLPBHH002	Residential	-	-	++
DLPBHH003	Residential	++	+	++
DLPBHH004	Residential	++	-	++
DLPBHH008	Residential	+	-	++
DLPBHH009	Residential	++	+	++
DLPBHH010	Residential	++	+	++
DLPBHPS1	Residential	-	-	++
DLPBHPS2	Residential	++	+	++
DLPDH2/DLPDH3/DLPDH4	Residential	++	++	++
DLPDH1	Residential	++	++	++
DLPDH5	Residential	++	++	++
DLPDH6	Residential	+	++	++
DLPDH7	Residential	+	-	++
DLPDH8	Residential	++	++	++
DLPDH9	Residential	++	++	++
DLPHH1	Residential	++	++	++
DLPHH2	Residential	++	++	++
DLPSH1	Residential	+	++	++
DLPSH2	Residential	+	+	+
DLPSH3	Residential	-	++	+
DLPSH4	Residential	++	++	++
DLPSH5	Residential	++	++	++
DLPSH6	Residential	++	+	+
DLPSH7	Residential	++	++	++
DLPH001	Residential	+	++	++
DLPH002	Residential	+	+	+
DLPH003	Residential	++	+	++
DLPH004	Residential	+	++	+
DLPH005	Residential	+	++	++
DLPH006	Residential	++	++	++
DLPH007	Residential	++	++	++
DLPH008	Residential	+	++	-
DLPH009	Residential	++	+	+
DLPH010	Residential	++	++	++
DLPH011	Residential	++	++	++
DLPH012	Residential	+	++	++
DLPH013	Residential	++	-	++
DLPH014	Residential	+	++	++
DLPH015/DLPH026	Residential	+	-	++
DLPH016	Residential	+	++	++
DLPH017	Residential	+	++	-

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
DLPH018	Residential	+	++	++
DLPH019	Residential	++	+	+
DLPH020	Residential	+	++	++
DLPH021	Residential	+	-	+
DLPH022	Residential	+	++	++
DLPH023	Residential	+	++	++
DLPH024	Residential	+	-	++
DLPH025	Residential	++	++	++
DLPH027	Residential	+	-	-
DLPH028	Residential	+	++	++
DLPH029	Residential	++	-	++
DLPH030	Residential	-	-	++
DLPH031	Residential	+	-	++
DLPH032	Residential	++	++	++
DLPH033	Residential	+	+	+
DLPH034	Residential	+	++	++
DLPH035	Residential	+	-	+
DLPH036	Residential	+	++	++
DLPH037	Residential	+	+	++
DLPH038	Residential	++	++	-
DLPH039	Residential	++	-	+
DLPH040	Residential	+	++	-
DLPH041	Residential	++	++	++
DLPH042	Residential	+	++	++
DLPH043	Residential	++	-	+
DLPH044	Residential	++	-	-
DLPH045	Residential	++	++	++
DLPH046	Residential	+	++	-
DLPH047	Residential	+	++	++
DLPH048	Residential	++	+	++
DLPH049	Residential	++	++	++
DLPH050	Residential	++	++	++
DLPH051	Residential	++	++	++
DLPH052	Residential	++	++	++
DLPH053	Residential	++	++	++
DLPH054	Residential	+	++	++
DLPH055	Residential	++	+	-
DLPH056	Residential	++	++	++
DLPH057	Residential	+	++	++
DLPH058	Residential	++	+	-
DLPH059	Residential	+	++	-
DLPH060	Residential	+	++	++
DLPH061	Residential	+	+	+

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
DLPH062	Residential	++	++	++
DLPKQH1	Residential	+	++	++
SA002	Residential	-	++	+
SA003-H	Residential	+	+	++
SA004	Residential	++	+	-
SA006	Residential	++	-	++
SA008	Residential	+	++	++
SA012	Residential	++	++	++
SA013	Residential	+	++	++
SA014	Residential	++	++	++
SA017	Residential	++	+	-
SA019	Residential	+	+	++
SA021	Residential	+	++	++
SA022	Residential	+	+	++
SA023	Residential	+	+	++
SA025	Residential	+	-	++
SA028	Residential	++	+	++
SA029	Residential	++	++	++
SA030	Residential	++	+	++
SA033	Residential	+	+	++
SA035	Residential	+	+	+
SA036-H	Residential	++	++	++
SA042	Residential	++	++	++
SA045	Residential	+	++	++
SA046	Residential	++	++	++
SA047-H	Residential	+	++	++
SA048	Residential	+	+	++
SA049	Residential	+	-	+
SA051	Residential	++	++	++
SA056	Residential	+	++	++
SA057	Residential	+	++	+
SA058	Residential	-	-	++
SA059-H	Residential	+	++	+
SA061	Residential	++	++	++
SA063	Residential	+	++	++
SA067	Residential	++	++	++
SA068	Residential	+	++	++
SA069	Residential	+	++	++
SA072-H	Residential	-	+	++
SA076	Residential	++	++	++
SA080	Residential	++	++	++
SA106	Residential	+	++	+
SA110	Residential	++	++	++

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA111	Residential	++	++	++
SA112	Residential	+	++	+
SA113	Residential	+	++	+
SA114	Residential	+	++	+
SA131	Residential	++	-	++
SA132	Residential	-	++	++
SA133	Residential	+	-	+
SA134	Residential	++	++	++
SA135	Residential	++	++	+
SA136	Residential	+	++	++
DLPE01	Employment	0	0	0
DLPE02	Employment	0	0	0
DLPE03	Employment	0	0	0
DLPE04	Employment	0	0	0
DLPE05	Employment	0	0	0
DLPE06	Employment	0	0	0
DLPE07	Employment	0	0	0
DLPE08	Employment	0	0	0
DLPE09	Employment	0	0	0
DLPE10	Employment	0	0	0
DLPE11	Employment	0	0	0
DLPE12	Employment	0	0	0
DLPE13	Employment	0	0	0
SA003-E	Employment	0	0	0
SA036-E	Employment	++	++	++
SA044	Employment	0	0	0
SA047-E	Employment	0	0	0
SA059-E	Employment	0	0	0
SA070	Employment	0	0	0
SA072-E	Employment	0	0	0
SA078	Employment	0	0	0
SA079	Employment	0	0	0
SA081	Employment	0	0	0
SA082	Employment	0	0	0
SA083	Employment	0	0	0
SA084	Employment	0	0	0
SA085	Employment	0	0	0
SA086	Employment	0	0	0
SA087	Employment	0	0	0
SA088	Employment	0	0	0
SA089	Employment	0	0	0
SA090	Employment	0	0	0
SA091	Employment	0	0	0

Site Reference	Site Use	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
SA092	Employment	0	0	0
DLPBHOS1	Mixed-Use (non-resi)	0	0	0
DLPBHOS2	Mixed-Use (non-resi)	0	0	0
DLPBHOS3	Mixed-use	++	+	++
DLPDOS1	Mixed-Use (non-resi)	0	0	0
DLPDOS2	Mixed-use	++	++	++
DLPDOS3	Mixed-use	++	++	++
DLPDOS4	Mixed-use	++	++	++
DLPDPS1	Mixed-use	+	++	++
DLPDPS2	Mixed-use	++	++	++
DLPHOS1	Mixed-use	++	++	++
DLPHOS2	Mixed-use	++	++	++
DLPHOS3	Mixed-use	++	++	++
DLPHOS4	Mixed-use	++	++	++
DLPHOS5	Mixed-use	++	++	++
DLPSOS1	Mixed-use	+	++	++
DLPSOS2	Mixed-Use (non-resi)	0	0	0
DLPSOS3	Mixed-use	++	++	++
DLPH006/DLPH007	Mixed-use	+	+	++
DLPGT001	GTTS	++	++	++
DLPGT002	GTTS	-	-	++
DLPGT003	GTTS	++	++	+
DLPGT004	GTTS	-	-	++
DLPGT005	GTTS	-	-	++
DLPGT006	GTTS	+	-	-
SAGT007	GTTS	-	-	++
SAGT008	GTTS	++	+	+
SAGT009	GTTS	+	-	++
SAGT010	GTTS	+	+	++
SAGT011	GTTS	++	+	-
SAGT012	GTTS	+	+	++
SAGT013	GTTS	++	+	++
SAGT014	GTTS	++	+	++
SAGT015	GTTS	++	-	+
SAGT016	GTTS	+	+	++
SAGT017	GTTS	+	+	++
SAGT018	GTTS	+	-	++
SAGT019	GTTS	+	-	++
SAGT020	GTTS	++	-	++
SAGT021	GTTS	+	++	++

Appendix D: Policy Assessments – DLP

Part 1 Spatial Strategy & Policies

Appendix D Contents

D.1	Overview	D1
D.1.1	Introduction	D1
D.1.2	Overview of Policy Assessments	D2
D.2	Development Strategy	D5
D.2.1	Policy DLP1 – Development Strategy	D5
D.2.2	Policy DLP2 – Growth Network: Regeneration Corridors and Centres	D6
D.2.3	Policy DLP3 – Areas outside the Growth Network.....	D8
D.2.4	Policy DLP4 – Achieving well designed places	D10
D.2.5	Policy DLP5 – Cultural Facilities, Tourism, Heritage, and the Visitor Economy	D12
D.3	Infrastructure	D15
D.3.1	Policy DLP6 – Infrastructure Provision.....	D15
D.3.2	Policy DLP7 – Broadband and Telecommunications.....	D16
D.4	Health and Wellbeing	D18
D.4.1	Policy DLP8 – Health and Wellbeing.....	D18
D.4.2	Policy DLP9 – Healthcare Infrastructure	D19
D.5	Housing.....	D22
D.5.1	Policy DLP10 – Delivering Sustainable Housing Growth.....	D22
D.5.2	Policy DLP11 – Housing Density, Type and Accessibility.....	D22
D.5.3	Policy DLP12 – Delivering Affordable, Wheelchair Accessible and Self-Build / Custom-Build Housing D24	
D.5.4	Policy DLP13 – Supported Accommodation.....	D26
D.5.5	Policy DLP14 – Housing Development, Extensions and Alterations to Existing Dwellings	D26
D.5.6	Policy DLP15 – Accommodation for Gypsies and Travellers and Travelling Showpeople	D28
D.5.7	Policy DLP16 – Education Facilities	D29
D.5.8	Policy DLP17 – Houses in Multiple Occupation	D31
D.6	Employment	D33
D.6.1	Policy DLP18 –Economic Growth and Job Creation	D33
D.6.2	Policy DLP19 – Strategic Employment Areas.....	D34
D.6.3	Policy DLP20 – Local Employment Areas	D35
D.6.4	Policy DLP21 – Other Employment Areas	D36
D.6.5	Policy DLP22 – Balancing Employment land and Housing and Protecting the Viability and Integrity of existing Industrial and Business uses	D37
D.6.6	Policy DLP23 – Social Value	D39
D.7	Centres and Town Centre Uses	D41
D.7.1	Policy DLP24 – Dudley Borough Centres.....	D41
D.7.2	Policy DLP25 – Local and District Centres and Local Services	D43
D.7.3	Policy DLP26 – Small Scale Local Facilities.....	D44
D.7.4	Policy DLP27 – Edge-of-Centre and Out-of-Centre Development	D45
D.7.5	Policy DLP28 – Residential Developments in Centres	D46

D.7.6	Policy DLP29 – Hot Food Takeaways	D48
D.7.7	Policy DLP30 – Shop Front Security	D49
D.8	Environment and Climate Change	D51
D.8.1	Policy DLP31 – Nature Conservation	D51
D.8.2	Policy DLP32 – Nature Recovery Network and Biodiversity Net Gain	D53
D.8.3	Policy DLP33 – Provision, retention and protection of trees, woodlands and Ancient Woodland, and Veteran trees	D55
D.8.4	Policy DLP34 – Provision, retention, and protection of Hedgerows.....	D59
D.8.5	Policy DLP35 – Geodiversity and the Black Country UNESCO Global Geopark.....	D60
D.8.6	Policy DLP36 – Canals	D61
D.8.7	Policy DLP37 – Open Space and Recreation.....	D63
D.8.8	Policy DLP38 – Playing Fields and Sports Facilities	D66
D.8.9	Policy DLP39 – Design Quality.....	D67
D.8.10	Policy DLP40 – Landscape Design.....	D71
D.9	Climate Change	D73
D.9.1	Policy DLP41 – Increasing Efficiency and Resilience	D73
D.9.2	Policy DLP42 – Energy Infrastructure.....	D74
D.9.3	Policy DLP43 – Managing Heat Risk.....	D77
D.9.4	Policy DLP44 – Air Quality.....	D78
D.9.5	Policy DLP45 – Flood Risk.....	D80
D.9.6	Policy DLP46 – Sustainable Drainage and Surface Water Management (SuDS)	D83
D.9.7	Policy DLP47 – Renewable and Low Carbon Energy and BREEAM Standards	D85
D.9.8	Policy DLP48 – Water Quality and Groundwater Source Protection Zones.....	D87
D.10	Green Infrastructure	D88
D.10.1	Policy DLP49 – Green Belt	D88
D.10.2	Policy DLP50 – Agricultural and Rural Workers Dwellings in the Green Belt	D89
D.10.3	Policy DLP51 – Dudley Borough’s Green Infrastructure Network.....	D90
D.10.4	Policy DLP52 – The Borough’s Geology	D92
D.10.5	Policy DLP53 - Parks	D93
D.10.6	Policy DLP54 – River Stour and its Tributaries	D95
D.11	Historic Environment	D97
D.11.1	Policy DLP55 – Historic Character and Local Distinctiveness of Dudley	D97
D.11.2	Policy DLP56 – Conservation Areas.....	D100
D.11.3	Policy DLP57 – Listed Buildings	D101
D.11.4	Policy DLP58 – Buildings or Structures of Local Historic and/or Architectural Importance.....	D102
D.11.5	Policy DLP59 – Areas of High Historic Townscape Value (AHHTV)	D103
D.11.6	Policy DLP60 – Areas of High Historic landscape Value (AHHLV).....	D103
D.11.7	Policy DLP61 – Registered Parks and Gardens and Designed Landscapes of High Historic Value (DLHHV)	D104
D.11.8	Policy DLP62 – Heritage Assets of archaeological interest, Scheduled Monuments and Archaeological Priority Areas (APA).....	D105

D.12	Recreation and Community uses	D107
D.12.1	Policy DLP63 – Public Open Space within New Large Housing Developments.....	D107
D.12.2	Policy DLP64 – Children’s Play Areas.....	D108
D.12.3	Policy DLP65 – Allotments and Community Gardens.....	D109
D.12.4	Policy DLP66 – Burial Land including Cemeteries and Crematoriums	D110
D.13	Transport	D112
D.13.1	Policy DLP67 – The Transport Network	D112
D.13.2	Policy DLP68 – The Key Route Network	D114
D.13.3	Policy DLP69 – Transport Impacts of New Development.....	D115
D.13.4	Policy DLP70 – The Movement of Freight	D116
D.13.5	Policy DLP71 – Active Travel	D117
D.13.6	Policy DLP72 – Demand for Travel and Travel Choices	D119
D.13.7	Policy DLP73 – Parking Management	D120
D.13.8	Policy DLP74 – Planning for Low Emission Vehicles	D120
D.14	Waste	D122
D.14.1	Policy DLP75 – Waste Infrastructure - Future Requirements	D122
D.14.2	Policy DLP76 – Waste Sites.....	D123
D.14.3	Policy DLP77 – Preferred Areas for New Waste Facilities.....	D124
D.14.4	Policy DLP78 – Locational Considerations for New Waste Facilities	D125
D.14.5	Policy DLP79 – Resource Management and New Development	D127
D.15	Minerals	D129
D.15.1	Policy DLP80 – Mineral Production - Requirements.....	D129
D.15.2	Policy DLP81 – Minerals Safeguarding.....	D130
D.15.3	Policy DLP82 – Managing the Effects of Mineral Development.....	D130
D.16	Development Management	D133
D.16.1	Policy DLP83 – Access for All	D133
D.16.2	Policy DLP84 – Incompatible Land Uses	D134
D.16.3	Policy DLP85 – Contaminated Land.....	D134
D.16.4	Policy DLP86 – Unstable Land	D135
D.16.5	Policy DLP87 – Noise Pollution	D136
D.16.6	Policy DLP88 – Light Pollution	D137

Tables

Table D.1.1: Presenting likely impacts	D1
Table D.1.2: Summary of policy assessments.....	D2

D.1 Overview

D.1.1 Introduction

- D.1.1.1 This appendix provides an assessment of draft policies proposed by Dudley Metropolitan Borough Council (DMBC) at the Regulation 18 stage of the preparation of the Dudley Local Plan (DLP) Part One: Spatial Strategy and Policies.
- D.1.1.2 Many policies are derived from the ceased Black Country Plan (BCP). A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022.
- D.1.1.3 DMBC have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the DLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and the smaller geographic area considered within the DLP compared to the former BCP.
- D.1.1.4 DMBC have also reviewed and updated other existing policies for the area and brought these forward for the DLP; this includes policies from the Dudley, Stourbridge and Halesowen AAPs. These policies are presented within Part 2 of the DLP (Allocations and Centres), and assessed within the SA **Appendix E**.
- D.1.1.5 The policies assessed within this appendix are based on the most up to date policy wording at the time of assessment, as presented within the Draft DLP Part One: Spatial Strategy and Policies received 5th October 2023. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording changes to the policies compared to that within the Regulation 18 Consultation version of the DLP.
- D.1.1.6 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) and are in accordance with the methodology as set out in **Chapter 2** of the SA Main Report.
- D.1.1.7 For ease of reference the scoring system is summarised in **Table D.1.1** below.

Table D.1.1: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-

Likely Impact	Description	Impact Symbol
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

D.1.1.8 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

D.1.2 Overview of Policy Assessments

D.1.2.1 The impact matrices for the assessments of Draft Policies DLP1 – DLP89 (i.e. all policies from the DLP Part 1) are presented in **Table D.1.2** below.

D.1.2.2 These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

D.1.2.3 Within these policy assessments, where relevant, some recommendations for enhancement or improvement of the draft policies have been suggested. Further detailed recommendations are presented in **Chapter 8** of the main SA Report.

Table D.1.2: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP1	+/-	+/-	+/-	+	0	+	-	-	+	++	0	+	++	0
DLP2	+/-	+	0	+	0	+	+	-	+	++	+	+	++	+
DLP3	+/-	+	+	+/-	+	+	+/-	-	+	+	+	0	+	0
DLP4	+	++	0	+	+	0	+	0	+	0	+	+	0	0
DLP5	+	+	0	+	0	0	+	0	+	0	+	+	+	0
DLP6	0	0	+	+	+	0	+	0	+	+	+	+	0	0
DLP7	0	0	0	+	0	0	+	0	+	0	+	0	+	0
DLP8	0	0	0	0	0	0	0	0	0	0	+	++	0	0
DLP9	0	0	0	+	0	0	+	0	+	0	+	++	0	0
DLP10	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-
DLP11	0	0	0	+	0	0	+	0	+	+	+	0	0	0
DLP12	0	0	0	0	0	0	0	0	0	+	+	+	0	0
DLP13	0	+	0	0	0	0	0	0	+	+	+	+	0	0
DLP14	0	+	0	0	0	+	0	0	0	0	0	0	0	0
DLP15	+/-	0	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+	+/-	+
DLP16	0	0	0	+	0	0	+	0	+	0	+	+	+	++
DLP17	0	0	0	0	0	0	0	0	+	+	+	+	0	0

Policy Ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
DLP18	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
DLP19	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
DLP20	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
DLP21	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
DLP22	0	0	0	0	0	0	+	0	0	+	0	0	+	0
DLP23	0	0	0	0	0	0	0	0	+	0	+	+	+	+
DLP24	+/-	+	+/-	+	+	+	+	0	+	+	+	+	+	0
DLP25	0	0	0	+	0	0	0	0	+	0	+	+	+	0
DLP26	0	0	0	+	0	0	0	0	+	0	+	+	+	0
DLP27	0	0	0	+	0	0	+	0	+	0	+	+	+	0
DLP28	0	0	0	0	0	+	0	0	+	+	0	+	0	0
DLP29	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DLP30	0	+	0	0	0	0	0	0	0	0	0	0	+	0
DLP31	0	+	++	+	+	0	+	0	0	0	+	+	0	0
DLP32	0	+	++	+	+	0	+	0	0	0	+	+	0	0
DLP33	+	+	++	+	+	0	0	0	0	0	0	+	0	0
DLP34	0	+	+	0	0	0	0	0	0	0	0	+	0	0
DLP35	+	+	+	0	0	0	0	0	0	0	0	0	+	+
DLP36	+	+	+	0	0	0	+	0	+	+	0	+	+	0
DLP37	+	+	+	+	+	0	+	0	+	0	+	+	0	0
DLP38	0	+	0	0	0	0	0	0	+	0	+	+	0	0
DLP39	+	+	+	+	+	+	+	0	+	0	+	+	0	0
DLP40	0	++	++	0	++	0	0	0	0	0	0	+	0	0
DLP41	+	+	+	++	+	+	+	+	0	+	0	+	0	0
DLP42	0	0	0	+	+	0	+	0	0	0	0	+	0	0
DLP43	0	0	+	+	+	0	+	0	0	0	0	0	0	0
DLP44	0	0	+	+	0	0	++	0	+	0	0	+	+	0
DLP45	0	0	+	0	++	0	+	0	0	0	0	+	0	0
DLP46	0	0	+	0	+	0	0	0	0	0	0	0	0	0
DLP47	0	0	0	+	0	0	+	0	0	0	+	+	0	0
DLP48	0	0	0	0	0	+	+	0	0	0	0	0	0	0
DLP49	0	+	0	0	0	+	0	0	0	0	0	+	0	0
DLP50	0	0	0	0	0	0	0	0	0	+	0	0	+	0
DLP51	0	+	+	+	+	0	+	0	+	0	0	+	+	0
DLP52	0	+	+	0	0	0	0	0	0	0	0	0	0	0
DLP53	+	+	+	0	0	0	0	0	+	0	+	+	0	0
DLP54	0	+	+	0	+	0	+	0	+	0	0	+	0	0
DLP55	++	++	+	0	0	0	0	0	0	0	0	0	+	0
DLP56	+	+	+	0	0	0	0	0	0	0	0	0	0	0
DLP57	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP58	+	+	0	0	0	0	0	0	0	0	0	0	0	0

Policy Ref	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
DLP59	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP60	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP61	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP62	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLP63	0	+	+	0	0	0	0	0	0	0	0	+	+	0
DLP64	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DLP65	0	0	+	0	0	0	0	0	0	0	+	+	0	0
DLP66	0	+	0	0	0	0	0	0	0	0	+	0	0	0
DLP67	0	0	0	+	0	0	+	0	++	0	+	+	0	0
DLP68	0	0	0	0	0	0	0	0	+	0	0	0	0	0
DLP69	0	0	0	+	0	0	0	0	+	0	0	0	0	0
DLP70	0	0	-	0	0	0	0	0	+	0	0	0	+	0
DLP71	0	0	0	+	0	0	+	0	++	0	+	+	0	0
DLP72	0	0	0	+	0	0	+	0	+	0	0	0	0	0
DLP73	0	0	0	+	0	0	+	0	+	0	0	0	0	0
DLP74	0	0	0	+	0	0	+	0	+	0	0	+	0	0
DLP75	0	0	0	0	0	0	0	++	0	0	0	0	0	0
DLP76	0	0	0	0	0	0	0	+	0	0	0	0	0	0
DLP77	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
DLP78	0	0	0	0	0	0	0	+	0	0	0	0	+	0
DLP79	0	0	0	0	0	+	0	++	0	0	0	0	0	0
DLP80	0	0	0	0	0	+	0	+	0	0	0	0	+	0
DLP81	0	0	0	0	0	+	0	0	0	0	0	0	0	0
DLP82	0	0	0	0	0	+	0	0	0	0	0	0	0	0
DLP83	0	0	0	+	0	0	+	0	+	0	+	+	0	0
DLP84	0	0	+	0	0	0	+	0	0	0	0	+	0	0
DLP85	0	0	0	0	0	+	+	0	0	0	0	+	0	0
DLP86	0	0	+	0	0	+	0	0	0	0	0	0	0	0
DLP87	0	0	0	0	0	0	+	0	0	0	0	+	0	0
DLP88	+	+	+	0	0	0	+	0	0	0	0	+	0	0
DLP89	0	+	0	0	0	0	0	0	0	0	0	+	0	0

D.2 Development Strategy

D.2.1 Policy DLP1 – Development Strategy

Policy DLP1 – Development Strategy	
1)	To deliver sustainable economic and housing growth and to meet strategic planning targets based on the needs of local communities and businesses, this plan will: <ol style="list-style-type: none"> Deliver at least 10,876 net new homes and create sustainable mixed communities that are supported by adequate infrastructure. Deliver the development of at least 25ha of employment land. Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.
2)	The spatial strategy seeks to deliver this growth and sustainable patterns of development by: <ol style="list-style-type: none"> Delivering development in the existing urban area supported by infrastructure to meet the needs of communities and businesses Focussing growth and regeneration into the Borough’s Centres and Regeneration Corridors, delivering new homes, jobs and local services Protecting Dudley’s character and environmental assets including heritage assets, natural habitats and open spaces Minimising and mitigating the likely effects of climate change
3)	Table x shows how the full housing and employment land requirements for the Dudley Borough will be met, including through reliance on neighbouring and other local authorities who have a functional link with Dudley via the Duty to Cooperate. Those development needs that cannot be accommodated within the Dudley administrative area will be exported to sustainable locations in neighbouring local authority areas.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP1	+/-	+/-	+/-	+	0	+	-	-	+	++	0	+	++	0

D.2.1.1 Policy DLP1 sets out the proposed spatial strategy for delivering sustainable development in Dudley over the plan period. The overall spatial approach has evolved from consideration of a number of spatial growth options for development. These have been informed by the evidence base underpinning the Draft DLP and were subject to SA (see **Chapters 3 and 4** of the main SA Report).

D.2.1.2 The delivery of 10,876 homes and 25ha of employment land as set out within this policy would be expected to make a significant contribution towards meeting the identified housing and employment needs for Dudley Borough. Alongside Duty to Cooperate (DtC) contributions, Policy DLP1 would be expected to support the delivery of sufficient growth

to meet the identified needs, leading to a major positive impact on SA Objectives 10 and 13.

- D.2.1.3 However, the construction, occupation and operation of this level of housing and employment growth as well as supporting infrastructure would be likely to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM), as well as waste production. Additionally, the increase in homes would expect an increase in waste production, by the nature of the development and the population increase. However, by directing development towards the Centres and Regeneration Corridors, Policy DLP1 would be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. On balance, the policy would therefore be expected to have a minor positive impact on climate change mitigation and transport (SA Objectives 4 and 9) and a minor negative impact on pollution and waste (SA Objectives 7 and 8).
- D.2.1.4 Policy DLP1 states that development will be directed towards town centres where there is greater access to local services, including healthcare facilities and the public transport network. The policy can therefore be expected to have a minor positive impact on health (SA Objective 12).
- D.2.1.5 Policy DLP1 seeks to deliver sustainable development through "*delivering development in the existing urban area*" as well as the Regeneration Corridors. The policy also states that it will protect natural habitats and open spaces. To fulfil both aims, it is likely some previously developed land will be reused. This will promote an efficient use of land and have a minor positive impact on the natural resources of the borough (SA Objective 6).
- D.2.1.6 The policy states that sustainable growth will also be achieved through "*protecting the Black Country's character and environmental assets including heritage assets, natural habitats and open spaces*". These measures will ensure that the landscape of the borough, historical assets and local biodiversity will be conserved. The emphasis on regeneration could also help to revitalise centres and improve the character and quality of the public realm. The development strategy also provides opportunities to benefit biodiversity due to the protection of sensitive features, and delivery of development in the existing urban area, coupled with Biodiversity Net Gain (BNG) requirements. However, the construction of a large quantum of growth through the policy would nevertheless be expected to put pressure on open spaces, urban biodiversity corridors, and landscape and historic character, to some extent. The extent of impacts will depend on location and contextual factors. Mixed effects on cultural heritage, landscape and biodiversity could occur, and as such, the overall impact is uncertain (SA Objectives 1, 2 and 3).

D.2.2 Policy DLP2 – Growth Network: Regeneration Corridors and Centres

Policy DLP2 - Growth Network: Regeneration Corridors and Centres

- 1) The Growth Network, consisting of Brierley Hill Strategic Centre, the town centres and the Regeneration Corridors, is the primary focus for new development, regeneration, and infrastructure investment to support the delivery of significant growth and promote wider benefits to communities.
- 2) The Strategic Centre (Brierley Hill) and Town Centres (Dudley, Stourbridge and Halesowen) will provide:

Policy DLP2 - Growth Network: Regeneration Corridors and Centres

- a. Re-energised core commercial areas providing a rich mix of uses and facilities, set in a high quality built and natural environment.
 - b. The principal locations for major commercial, cultural, leisure, entertainment, sports, recreation and community facilities, providing the widest possible range of such facilities appropriate for their catchments.
 - c. 2,870 new homes of mixed type and tenure.
 - d. Excellent public transport links, making the centres highly accessible to their catchment areas.
 - e. An improved network of green and environmental infrastructure.
- 3) The Regeneration Corridors linking the Strategic Centre and Town Centres will provide:
- a. The principal concentrations of strategic employment areas. These are high-quality employment areas that will be safeguarded and enhanced for manufacturing and logistics activity to support the long-term success of the local economy (see Policy DLP19).
 - b. The main clusters of local employment land that are vital in providing for local jobs (see Policy DLP20).
 - c. The principal locations for new industrial and logistics development - providing 25ha of developable employment land to meet growth needs.
 - d. A minimum of 4,948 new homes in sustainable locations well-supported by community services and local shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes.
 - e. The focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors.
 - f. Strong links with the surrounding communities and network of centres, to spread the regeneration benefits across the borough.
 - g. An improved network of green and environmental infrastructure.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP2	+/-	+	0	+	0	+	+	-	+	++	+	+	++	+

D.2.2.1 Policy DLP2 identifies Centres and Regeneration Corridors within Dudley and sets out how each area will accommodate different types of development, infrastructure and investment. The policy outlines a total of 2,870 new homes to be built within the Strategic Centre of Brierley Hill, and a minimum of 4,948 homes within the Regeneration Corridors and includes measures throughout the policy that encourage use of sustainable transport, regeneration and delivery of high-quality development for a range of uses in appropriate locations. A major positive impact on housing provision (SA Objective 10) would be likely.

D.2.2.2 By focusing development in Centres, it is likely that brownfield sites will predominantly be used which represents an efficient use of land. It is recommended that the wording of

this policy is strengthened to confirm this. Policy DLP2 also has a primary focus on regeneration of existing urban areas and high-quality design which should help to improve the character and townscape within Dudley, as well as potentially remediating existing contamination issues. Therefore, a minor positive impact is anticipated in terms of landscape and natural resources (SA Objectives 2 and 6).

- D.2.2.3 The Strategic Centre and Town Centres will provide principal locations for cultural facilities appropriate for their catchments, hence benefits could be seen for cultural heritage. However, directing a large proportion of development to the Regeneration Corridors and Centres may put pressure on heritage assets, potentially harming their significance and settings. The overall impact of the policy on cultural heritage (SA Objective 1) is uncertain. It is recommended that the policy includes wording to promote heritage-led regeneration which ensures the conservation and enhancement of the historic environment.
- D.2.2.4 The policy states that the defined Regeneration Corridors will provide high-quality employment land and will be the principal location for new industrial/logistics development, with likely benefits in terms of economic growth and providing opportunities for developing a skilled workforce. A major positive impact on the economy (SA Objective 13) and a minor positive impact on education (SA Objective 14) would therefore be likely.
- D.2.2.5 Focusing on the Strategic Centre of Brierley Hill, the policy states that development will be provided in areas that possess *"the widest possible range of such facilities appropriate for their catchment"* and *"an improved network of green and environmental infrastructure"*. For the Regeneration Corridors collectively, the policy encourages investment in transport infrastructure, especially public transport. Directing development to these areas would help to ensure that residents have good access to services including community services, local shops and employment and educational opportunities by foot or public transport and could see less reliance on private car use. The strategic location of development would therefore encourage active lifestyles and could contribute to reducing the overall carbon footprint of the borough. Overall, the policy would be likely to have a minor positive impact on climate change mitigation, pollution, transport and equality (SA Objectives 4, 7, 9 and 11).
- D.2.2.6 The policy also states that development proposals will incorporate GI which could potentially benefit biodiversity and climate change adaptation. However, it is recommended that the policy provides further specification of the GI measures to strengthen the policy. An overall negligible impact has been identified for SA Objectives 3 and 5 based on the current wording.
- D.2.2.7 The introduction of a significant number of new homes and employment land within the policy would be likely to lead to an increase in waste, to some extent. However, development is likely to be located strategic transport routes and would provide residents with access to waste management infrastructure. The overall impact of the policy on waste (SA Objective 8) is assessed as uncertain with the current information available.

D.2.3 Policy DLP3 – Areas outside the Growth Network

Policy DLP3 – Areas outside the Growth Network

- | |
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| 1) By 2041, the areas outside the Growth Network will provide: |
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Policy DLP3 – Areas outside the Growth Network

- a. A mix of good quality residential areas where people choose to live.
 - b. A strong and improved network of green and blue infrastructure, centres and community facilities to promote health and wellbeing.
 - c. Strong links to Regeneration Corridors and Centres, via access and design improvements to spread regeneration benefits and ensure integration of new and existing communities.
 - d. A supply of development opportunities through allocations on surplus land.
- 2) The main role of areas outside the Growth Network are to provide employment opportunities to serve communities outside the Regeneration Corridors and Centres and to provide a supply of housing land at appropriate densities to meet local needs. Local and District Centres will be protected and enhanced, to serve new and proposed development. Site allocations and windfall developments in areas outside the Growth Network are listed in Part 2, Table XX.
 - 3) The broad approach to development in areas outside the Growth Network will be to primarily focus on brownfield land, in locations with best access to local services and infrastructure.
 - 4) Improved green and blue infrastructure, linked with protected Green Belt will promote health and wellbeing, support biodiversity and will bring the countryside and its landscape into the heart of the urban area.
 - 5) Dudley’s Green Belt boundaries will be maintained and protected from inappropriate development.
 - 6) Focusing development in the most accessible locations, developing a strong network of centres and community facilities and creating strong links to the growth network will support social inclusion and the creation of sustainable communities.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP3	+/-	+	+	+/-	+	+	+/-	+/-	+	+	+	0	+	0

D.2.3.1 Policy DLP3 aims to ensure that areas outside of the Growth Network (Regeneration Corridors and Centres) will provide good quality mixed housing, strong GI networks, good transport links, and additional development opportunities.

D.2.3.2 Through the provision of “good quality residential areas” and “employment opportunities to serve communities”, the policy would be likely to result in a minor positive impact on housing, equality and the economy (SA Objectives 10, 11 and 13).

D.2.3.3 Policy DLP3 states that “Local and District Centres will be protected and enhanced, to serve new and proposed development”. Therefore, the policy would help to ensure that new and existing residents in these areas have access to services and facilities to meet their needs, reducing the need to travel, whilst also ensuring development is directed to “locations with best access to local services and infrastructure” including connections to Centres and Regeneration Corridors where the majority of growth will be located. Overall, the policy would be expected to result in a minor positive impact on transport (SA Objective 9).

- D.2.3.4 There is potential for the policy to lead to benefits for climate change mitigation and pollution, however it is recommended that stronger reference is made to prioritising sustainable travel including public transport and active travel to facilitate a modal shift away from private car use. At this stage, the overall impact of this growth is uncertain for SA Objectives 4 and 7.
- D.2.3.5 It is assumed that schools and healthcare will be safeguarded, and any development will have negligible impacts on health and education (SA Objectives 12 and 14).
- D.2.3.6 Outside of the Growth Network, the broad approach to development as set out in the policy will be focused on brownfield land and the openness of the Green Belt will be conserved, alongside enhancements to green and blue infrastructure within the urban area. Due to the broad protection of previously undeveloped land under the policy, a minor positive impact on natural resources would be expected (SA Objective 6). The protection of open spaces, as well as the commitment within Policy DLP3 to improve GI networks could potentially lead to a minor positive impact on climate change adaptation (SA Objective 5). Furthermore, the protection of open spaces and areas of nature conservation value could lead to a minor positive impact on biodiversity (SA Objective 3).
- D.2.3.7 Policy DLP3 seeks to provide “*a strong and improved network of green and blue infrastructure*” and high-quality development. The policy sets out protection for Green Belt land, which would help to protect the openness of the wider landscape. Overall, the policy has potential to lead to a minor positive impact on the local landscape (SA Objective 2). There is however some uncertainty regarding the impact of development in these areas on cultural heritage (SA Objective 1).
- D.2.3.8 The introduction of new homes and employment land within the areas outside the growth network, as supported within the policy, would be likely to lead to an increase in waste, to some extent. However, development is likely to be located close to strategic transport routes and would potentially provide more sustainable access to waste management infrastructure. The overall impact of the policy on waste (SA Objective 8) is uncertain with the current information available.

D.2.4 Policy DLP4 – Achieving well designed places

Policy DLP4 – Achieving well designed places

- 1) Regeneration within the borough will be supported by the development of places and buildings providing a range of functions, tenures, facilities, and services, intended to support the needs of diverse local communities.
- 2) Developments will be expected to incorporate high-quality design in line with the Council’s adopted design codes/guides and supplementary planning documents.
- 3) The design of spaces and buildings will be influenced by their context; development should enhance the unique attributes of Dudley’s character and heritage whilst responding to locally identified community needs, changes in society and cultural diversity.
- 4) Building designs will be sought that are appropriate to Dudley, of a size, scale and type to integrate into their neighbourhood. Development proposals should employ sustainable technologies to help climate change mitigation and adaptation. The use of efficient building design, the choice of low- and zero-carbon materials, and intelligent site layout and building orientation can all help to reduce reliance on carbon-based products, energy and non-renewable resources.

Policy DLP4 – Achieving well designed places

- 5) All development will be required to demonstrate a clear understanding of the historic character and local distinctiveness of its location and show how proposals make a positive contribution to place-making and environmental improvement. It should also ensure that the significance of local heritage is recognised and reflected in designs and that new development retains and protects historic significance to the greatest extent possible.
- 6) Maximum freedom of movement and a choice of sustainable means of transport, including ongoing support for the provision and extension of walking and cycling infrastructure should be promoted through new development. Transport proposals should include connections to and between transport hubs, ensuring that interventions make a positive contribution to place-making and increase accessibility and connectivity.
- 7) Dudley Borough will be a safe and secure place to live and work in, through organising the urban environment in ways that encourage people to act in a responsible manner (see Policy DLP39). Development proposals will be required to provide active frontages, well-located, safe and accessible pedestrian and cycle infrastructure and an appropriate intensity of use in centres and elsewhere. Designs should promote natural surveillance and defensible spaces.
- 8) An integrated and well-connected multifunctional open space network will be pursued throughout the borough, including through the design and layout of new residential and employment developments. This will deliver opportunities for sport and recreation and will help establish and support a strong natural environment. Properly designed and well-located open spaces will help mitigate flood risk, provide space for wildlife and encourage informal recreation for local people as well as help create a high-quality living environment. This will also be important for the delivery of the Nature Recovery Network strategy (Policy DLP32).
- 9) The protection and enhancement of the borough’s historic canal network and the area’s natural waterways will be sought to the extent possible through the design and layout of appropriately located housing and employment development and by the integration of waterways into those proposals to create attractive waterside development. This will act as a unifying characteristic within the Dudley Borough’s urban structure and landscape.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP4	+	++	0	+	+	0	+	0	+	0	+	+	0	0

D.2.4.1 Policy DLP4 seeks to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built, and historic environment.

D.2.4.2 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design and support for an innovative and renewable approach. The use of modern and sustainable technologies would be likely to have minor positive impacts on climate change mitigation and adaptation (SA Objectives 4 and 5).

D.2.4.3 Policy DLP4 seeks to ensure that the development contributes to creating "*active frontages, well-located, safe and accessible pedestrian and cycle infrastructure*" in a bid to reduce health inequalities, improve social cohesion and reduce the fear of crime within

the borough. Therefore, the policy would be expected to have a minor positive impact on equality (SA Objective 11).

D.2.4.4 There is potential for a minor positive impact on biodiversity (SA Objective 3) since this policy aims to protect and enhance the borough's historic canal network which would likely benefit biodiversity in the area. Under the policy, *"an integrated and well-connected multifunctional open space network will be pursued"* which will also be properly designed and well-located to provide space for wildlife.

D.2.4.5 The policy requires that development includes well designed transport infrastructure of high-quality design that will contribute to greater accessibility. This includes the promotion of active travel, increased connectivity of travel modes and transport hubs. In addition, the policy seeks to produce *"an integrated and well-connected multifunctional open space network"*, which would help to facilitate active travel and provide open space for outdoor exercise and recreation. The measures outlined in the policy would encourage active travel and reduce reliance on private car use, with benefits to carbon emissions, air pollution, congestion, and public health. Overall, the policy would be expected to have minor positive impacts on pollution, transport, and public health (SA Objectives 7, 9 and 12).

D.2.4.6 The policy states that development must demonstrate *"a clear understanding of the historic character and local distinctiveness of its location and show how proposals make a positive contribution to place-making and environmental improvement"*. A minor positive impact in relation to the historic character would be expected (SA Objectives 1), and a major positive impact in relation to the landscape character (SA Objective 2). It is recommended that wording to *"conserve and enhance"* heritage assets is used rather than *"retain and protect"* in line with the NPPF to strengthen the policy with regard to the historic environment.

D.2.5 Policy DLP5 – Cultural Facilities, Tourism, Heritage, and the Visitor Economy

Policy DLP5 - Cultural Facilities, Tourism, Heritage, and the Visitor Economy

Economy

Development Proposals

- 1) Cultural, tourist and leisure venues and facilities within Dudley will be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders. Such provision includes, protecting and promoting the borough's strong industrial heritage and the smaller scale venues and attractions that are an important part of creating a diverse offer.
- 2) Proposals for new developments or uses that contribute to the attractiveness of Dudley as a visitor destination will be supported in principle, subject to national guidance and policy requirements elsewhere in the Plan.
- 3) Proposals for new or expanded facilities or uses should:
 - a. Be of a high-quality design
 - b. Be highly accessible, particularly within centres
 - c. Not adversely impact on residential amenity or the operations of existing businesses

Policy DLP5 - Cultural Facilities, Tourism, Heritage, and the Visitor Economy

- d. Be designated to be flexible, adaptable, and where possible be capable of alternative or community-based uses
- 4) Well-designed and accessible ancillary facilities will be supported in appropriate locations. Additional facilities that support the visitor economy and business tourism sectors (including hotels) will be encouraged and promoted within centre locations, in line with policy DLP2.
- 5) Development that would lead to the loss of an existing cultural or tourist facility in Dudley will be resisted unless:
- The intention is to replace it with a facility that will provide an improved cultural or tourist offer; or
 - It can be demonstrated that there would be significant benefits to the local and wider community in removing the use and/or redeveloping the site.

The Visitor Economy

- 6) Improvement and further development of visitor attractions will be supported where appropriate, to ensure that accessibility is maximised and to continue to raise the quality of the visitor experience throughout Dudley. This can be achieved by:
- Enhancing/extending current attractions
 - Providing inclusive access, particularly within centres
 - Enhancing the visitor experience
 - Delivering necessary infrastructure
- 7) Links should be made to centres and those parts of Dudley and beyond that are well-connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and tourist attractions.
- 8) Physical and promotional links to visitor attractions close to Dudley will be enhanced and encouraged, particularly in relation to the wider Black Country, Birmingham as a global city and a business economy destination and the Black Country UNESCO Global Geopark.

Cultural facilities and events

- 9) The promotion and protection of other cultural attractions and events across the borough will be encouraged, including the provision of new venues, performance spaces and facilities, particularly in the centres.
- 10) In cases where adjacent new developments would prejudice the ongoing operation of successful cultural/performance venues, the agents of change¹, principle will be applied. This will protect the amenities of incoming residents whilst at the same time it will preserve and protect the existing adjacent use/activity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP5	+	+	0	+	0	0	+	0	+	0	+	+	+	0

- D.2.5.1 Policy DLP5 aims to protect, enhance, promote, and expand cultural, tourist and leisure facilities within the borough. The policy would be likely to have a minor positive impact on the economy through the safeguarding and promotion of such sites and by enhancing the tourism potential of Dudley (SA Objective 13).
- D.2.5.2 Alongside the delivery of highly accessible facilities and provision of local employment opportunities, various provisions within this policy would be expected to have benefits to the community and promote social inclusion. These include the promotion and protection of *"cultural attractions and events across the borough"*. A minor positive impact on equality would therefore be expected (SA Objective 11).
- D.2.5.3 The policy includes measures that would improve the accessibility of the visitor facilities within the borough, enabled through delivering the necessary infrastructure to ensure links to centres that are well supported by public transport. Encouraging the use of local attractions and facilitating accessibility to these attractions would encourage active travel and improve health of residents and can further reduce the reliance on private car use. Therefore, the policy can be expected to have a minor positive impact on climate change mitigation, pollution, transport, and health (SA Objectives 4, 7, 9 and 12).
- D.2.5.4 The policy aims to protect the amenities of incoming residents and *"preserve and protect the existing adjacent use/activity"* existing land uses and activities. This would be likely to help ensure developments are of high-quality design and create attractive areas. In addition, this policy aims to ensure cultural facilities are protected and enhanced in a way that could potentially facilitate engagement and local awareness of the areas heritage resources and cultural history. This would be likely to have a minor positive impact on cultural heritage and landscape (SA Objectives 1 and 2). The policy would benefit from stronger wording surrounding heritage assets to ensure that any development proposals for heritage-related tourism and other facilities through the policy will ensure that the settings and significance of any associated cultural heritage assets will be conserved and enhanced.

D.3 Infrastructure

D.3.1 Policy DLP6 – Infrastructure Provision

Policy DLP6 – Infrastructure Provision

- 1) All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community, and ensure that it is sustainable and contributes to the proper planning of the wider area.
- 2) Unless material circumstances or considerations indicate otherwise, development proposals will only be permitted if all necessary infrastructure improvements, mitigation measures and sustainable design requirements and proposals are provided and /or can be phased to support the requirements of the proposed development. These will be secured through planning obligations, the Community Infrastructure Levy/Infrastructure Funding Statements, planning conditions or other relevant means or mechanisms as necessary, to an appropriate timetable that is prioritised, resourced, managed, delivered and co-ordinated.
- 3) Dudley Council will set out in supporting planning documents and planning guidance:
 - a. The infrastructure that is to be provided or supported
 - b. The prioritisation of and resources for infrastructure provision
 - c. The scale and form of obligation or levy to be applied to each type of infrastructure
 - d. Guidance for integration with infrastructure within adjoining local authority areas
 - e. The procedure for maintenance payments and charges for preparing agreements
 - f. The defined circumstances and procedure for negotiation regarding infrastructure provision
- 4) Exceptional circumstances, to a proposed development not meeting its on-site and off-site infrastructure needs or ability to deliver appropriate measures to mitigate against its impact on existing infrastructure, will only be considered where significant viability concerns can be evidenced through early engagement with the Council in raising this as an issue, and through the submission of a detailed (financial) Viability Assessment.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP6	0	0	+	+	+	0	+	0	+	+	+	+	0	0

D.3.1.1 Policy DLP6 identifies the infrastructure required to support the growth that is expected from the DLP. The policy requires development proposals to address their own impacts through on-site and off-site infrastructure provision or enhancements, secured through planning obligations or CIL as appropriate.

D.3.1.2 The supporting text for this policy, in line with NPPF guidance¹, states that developments would provide or contribute towards a range of infrastructure including affordable housing, renewable energy, publicly accessible open space, sustainable drainage, sport and recreational facilities, biodiversity net gain, transport, air quality mitigation and residential services. The policy also requires development proposals to incorporate sustainable design and states that development proposals should *"mitigate its impacts on the environment and the local community and ensure that it is sustainable and contributes to the proper planning of the wider area"*. Therefore, minor positive impacts would be likely across SA Objectives including biodiversity, climate change mitigation, climate change adaptation, pollution transport, housing, equality and health (SA Objectives 3, 4, 5, 7, 9, 10, 11 and 12).

D.3.2 Policy DLP7 – Broadband and Telecommunications

Policy DLP7 – Broadband and Telecommunications

- 1) Proposed development comprising 10 or more new homes or more than 1,000 sqm of non-residential floorspace will be required to deliver Fibre to The Premises (FTTP) capacity / infrastructure to all individual units, with details on the delivery of FTTP set out within a submitted Fibre to The Premises (FTTP) Statement.
- 2) This requirement will only be reduced where it can be clearly demonstrated to the satisfaction of the Council that it is not practical nor viable to deliver FTTP.
- 3) Where FTTP is evidenced as impractical to deliver, as an alternative, non-next generation access technologies that can provide speeds in excess of 30MB per second, shall be provided.
- 4) Any proposals for infrastructure to support the delivery of the latest generation (G) network will be supported in principle, subject to meeting the requirements of other local policies and national guidance.
- 5) Proposals for telecommunications masts and equipment shall be accompanied by evidence to demonstrate that the sharing of an existing mast and other alternatives to the provision of a new mast has been considered and found not to be practical to provide for the efficient operation of the telecommunications network.
- 6) Proposals for telecommunications masts and equipment shall be sensitively sited and designed to minimise impacts on the environment, amenity, and character of the surrounding area, with particular regard to their potential visual intrusion and risk to highway safety. Such proposals will be permitted provided that:
 - a. the siting and design of the apparatus is acceptable, including its external appearance.
 - b. the development shall not have an unacceptable effect on areas of ecological interest, areas of landscape importance, heritage assets, conservation areas or buildings of architectural or historical interest.
 - c. proper regard has been given to location and landscaping requirements, including innovative design solutions, that are complementary to the immediate surroundings.
 - d. any impact on amenity and/or highway safety is acceptable.

¹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 09/10/23]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP7	0	0	0	+	0	0	+	0	+	0	+	0	+	0

- D.3.2.1 Policy DLP7 supports the provision of Fibre to the Premises (FTTP) and electronic communication networks as part of new development proposals, to meet the needs of current and future populations.
- D.3.2.2 With improvements to broadband and electronic communications in the area under this policy, businesses could benefit in terms of improved efficiency and residents would be likely to have greater access to essential services from home. This would provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objectives 11 and 13). In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use such as for commuting to workplaces, and in turn, reduce local congestion. This could therefore lead to an indirect minor positive impact on climate change, due to reduced emissions associated with less traffic, air quality and transport (SA Objectives 4, 7 and 10).
- D.3.2.3 The policy states that "*development shall not have an unacceptable effect on areas of ecological interest, areas of landscape importance, heritage assets, conservation areas or buildings of architectural or historical interest*". Therefore, the policy would be expected to have negligible impacts on cultural heritage, landscape, and biodiversity (SA Objective 1, 2 and 3).

D.4 Health and Wellbeing

D.4.1 Policy DLP8 – Health and Wellbeing

Policy DLP8 – Health and Wellbeing	
1)	The Council will support developments which create an environment that promotes healthy communities, protects and improves the physical, social and mental health and wellbeing of its residents, including children, young people and vulnerable adults and which reduces health inequalities. Developments should help to maximise opportunities to improve the quality of life, make it easier for people within Dudley to lead healthy, active lifestyles and encourage healthy choices.
2)	The following developments are required to provide a screening Health Impact Assessment as part of the planning application: <ol style="list-style-type: none"> residential developments over 150 dwellings or 5ha Industrial developments over 5ha other developments over 1ha new developments which include any of the following uses: <ol style="list-style-type: none"> Hot Food Takeaways development which would result in the loss of any of the following uses: <ol style="list-style-type: none"> Education Facilities Health Facilities Leisure and Community Facilities Public Accessible Open Space
3)	Developments which have a significant negative impact on health and wellbeing will not be supported where applicants cannot provide mitigation of, or compensation for such impacts through planning conditions and/or financial/other contributions secured through planning obligations.
4)	To support the physical, social, and mental health and wellbeing of its residents, Dudley will support vibrant centres and local facilities, this will include managing the location, concentration of and operation (including opening hours) of businesses which contain uses running contrary to these aims including: <ol style="list-style-type: none"> Proposed developments for Hot food takeaways (including hybrid uses incorporating such uses). Developments will only be supported where they support this aim and Policy DLP29.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP8	0	0	0	0	0	0	0	0	0	0	+	++	0	0

D.4.1.1 Policy DLP8 supports initiatives that encourage healthier lifestyles, the improvement of mental wellbeing and addressing socio-economic and environmental issues that contribute to health inequalities.

- D.4.1.2 The policy seeks to create an environment that “*promotes healthy communities*” which will be achieved through the support of physical, social and mental wellbeing of residents. The policy aims to ensure residents can pursue healthy lifestyle choices through requiring Health Impact Assessments (HIA) to be prepared alongside specific planning applications to identify and address any adverse effects on health. The policy states that developments would not be supported if found to be incapable of providing mitigation or compensation of negative impacts on health, including those which would result in the loss of healthcare, leisure facilities and open space. Additionally, the policy will manage the location and concentration of businesses that contain uses running contrary to health and wellbeing aims. Overall, a major positive impact in relation to human health would be expected (SA Objective 12).
- D.4.1.3 The policy aims to create an environment that “*protects and improves the physical, social and mental health and wellbeing of its residents, including children, young people and vulnerable adults and which reduces health inequalities*”. The policy would help to ensure that the loss of health, leisure and community facilities is resisted, promoting good access to facilities and supporting community interaction, with benefits to both physical and mental wellbeing. Therefore, the policy can be expected to have a minor positive impact for equality (SA Objective 11).
- D.4.1.4 The policy outlines the development proposals that would require a HIA to be accompanied in the planning application process, including proposals that result in the loss of educational facilities. Therefore, the policy can be expected to have a negligible impact on the access of residents to education (SA Objective 14).
- D.4.1.5 Policy DLP8 would benefit from the inclusion of stronger wording surrounding the conservation and enhancement of open space and the inclusion of reference to multi-functional green and blue infrastructure networks, which would be expected to provide positive impacts on the local landscape and biodiversity of the borough as well as further benefits to human health and the natural environment.
- D.4.1.6 It is further recommended that the Council consider requiring HIA Screening for all major development proposals such as those of 10 residential units or more rather than 150 as set out in the policy.

D.4.2 Policy DLP9 – Healthcare Infrastructure

Policy DLP9 – Healthcare Infrastructure

- 1) New Healthcare facilities should be:
 - a. Well-designed, complement and enhance neighbourhood services and amenities;
 - b. Well-served by public transport infrastructure, walking and cycling facilities and directed to a centre appropriate in role and scale to the proposed development, and its intended catchment area, in accordance with policies DLP24 and DLP25. Proposals located outside centres must be justified in terms of relevant policies such as DLP26 and DLP27, where applicable;
 - c. Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy DLP11, particularly where a significant amount of new housing is proposed;
 - d. Where possible, co-located with a mix of compatible community services on a single site.

Policy DLP9 – Healthcare Infrastructure

- 2) Existing primary and secondary healthcare infrastructure and services will be protected, unless it can be demonstrated that the loss of the existing facility has a satisfactory replacement or is no longer fit for purpose as part of a wider public service transformation plan which requires investment in modern infrastructure and facilities. New or improved healthcare facilities and services will be provided, in accordance with requirements agreed between the Local Planning Authorities and Local Health Organisations.
- 3) Proposals for major residential developments of 10 units or more must be assessed against the capacity of existing healthcare facilities and/or services. Where the demand generated by the residents of the new developments would have unacceptable impacts upon the capacity of these facilities, developers will be required to contribute to the provision or improvement of such services. Where it is not possible to address such provision through planning conditions, a planning agreement or planning obligations may be required.
- 4) In the first instance, infrastructure contributions will be sought to deal with relevant issues on the site or in its immediate vicinity. Where this is not possible, an offsite (commuted sum) contribution will be negotiated.
- 5) The effects of the obligations on the financial viability of development will be a relevant consideration. Where necessary, financial viability assessments will be required to be submitted.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP9	0	0	0	+	0	0	+	0	+	0	+	++	0	0

D.4.2.1 Policy DLP9 seeks to ensure that all new healthcare facilities are well designed and accessible, with a particular focus on ensuring facilities are accessible by public transport. The policy also aims to protect existing health facilities, and details how larger residential developments of ten or more homes should be assessed against the capacity of surrounding facilities and new facilities should *"be located to address accessibility gaps"*. These factors would be expected to help ensure all new residents have good access to healthcare facilities, and as such, a major positive on health would be expected (SA Objective 12).

D.4.2.2 By identifying and addressing accessibility gaps, this policy would also be expected to promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality would be expected (SA Objective 11).

D.4.2.3 This policy seeks to ensure that all healthcare developments are located in areas with good public transport access for residents, and that where possible, healthcare facilities are co-located alongside other community services to serve nearby residential development. This policy could potentially reduce the need to travel and reduce the volume of visitors arriving at facilities via private car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, due to the focus on sustainable transport

and accessibility, this policy could potentially have a minor positive impact on climate change mitigation, pollution, and transport (SA Objectives 4, 7 and 9).

D.5 Housing

D.5.1 Policy DLP10 – Delivering Sustainable Housing Growth

Policy DLP10 – Delivering Sustainable Housing Growth

- 1) Sufficient land will be provided to deliver at least 10,876 net new homes over the plan period of 2023-2041. The key sources of housing land supply are summarised in Table 8.1 and all housing allocations are set out in DLP Part Two.
- 2) The majority of the requirement will be met through sites with existing planning permission and sites allocated for housing by this Plan. Additional housing supply will also be secured on windfall sites in the urban area in Dudley. The estimated net effect of housing renewal up to 2041 will be reviewed annually and considered in the calculation of housing land supply.
- 3) The development of sites for housing should demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice the achievement of high-quality design on the allocation.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP10	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-

D.5.1.1 Policy DLP10 would be expected to deliver a high quantum of residential development of 10,876 net new homes over the plan period in Dudley. However, this policy would not be expected to fully meet the identified housing needs of the Dudley, which, based on the most up to date national standard method housing calculation, is 11,954 homes to 2041. Overall, a minor positive impact on housing provision would be expected (SA Objective 10).

D.5.1.2 An uncertain impact has been identified on the remaining SA objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. Proposed sites are evaluated in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendices (see **Appendix C**).

D.5.2 Policy DLP11 – Housing Density, Type and Accessibility

Policy DLP11 - Housing Density, Type and Accessibility

- 1) The density and type of new housing provided on any housing site should be informed by:
 - a. The need for a range of types and sizes of accommodation to meet identified sub-regional and local needs,

Policy DLP11 - Housing Density, Type and Accessibility

- b. The level of accessibility by sustainable transport to residential services, including any improvements to be secured through development, as set out in Table 8.2,
 - c. The need to achieve high-quality design and minimise amenity impacts, considering the characteristics and mix of uses in the area where the proposal is located.
- 2) Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
- 3) All developments of ten homes or more should achieve the minimum net density set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy DLP55:
- a. 100 dwellings per hectare where Table 8.2 accessibility standards for very high-density housing are met and the site is located within a Strategic Centre or Town Centre,
 - b. 45 dwellings per hectare where Table 8.2 accessibility standards for high-density housing are met,
 - c. 40 dwellings per hectare where Table 8.2 accessibility standards for moderate-density housing are met.
- 4) DLP Part 2 provides details of the appropriate density and, where appropriate, house type mix, to be sought on each housing allocation site, in accordance with the requirements set out in this Policy. Further details of design requirements for housing developments will be set out in Supplementary Planning Documents.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP11	0	0	0	+	0	0	+	0	+	+	+	0	0	0

D.5.2.1 Policy DLP11 aims to ensure that residential developments contribute towards the local housing need, supporting the current and future requirements of the population in terms of housing type and size, as well as ensuring new residents have good access to sustainable transport options. The policy sets out appropriate densities of housing to be delivered within each area relative to the accessibility standards, as set out in the policy supporting text, which would be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping and promotes social inclusion in the community. This would be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).

D.5.2.2 Due to the requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy could potentially help to reduce emissions of GHGs and air pollutants associated with road transport. Therefore, a minor positive impact would be anticipated on climate change mitigation and pollution (SA Objectives 4 and 7).

D.5.3 Policy DLP12 – Delivering Affordable, Wheelchair Accessible and Self-Build / Custom-Build Housing

Policy DLP12 – Delivering Affordable, Wheelchair Accessible and Self-Build / Custom-Build Housing

Affordable Housing

- 1) Developments of ten homes or more should, where financially viable, provide a range of tenure that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
- 2) All developments of ten homes or more should provide a proportion of affordable housing, where this is financially viable. The minimum proportion of affordable housing that should be provided is:
 - a. On all sites in lower value zones and brownfield sites* in medium value zones: 10% affordable housing,
 - b. On greenfield sites* in medium value zones: 20% affordable housing,
 - c. On all sites in higher value zones: 30% affordable housing
- 3) The tenure and type of affordable homes sought will be determined on a site-by-site basis, based on national planning policy and best available information regarding local housing needs, site surroundings and viability considerations. Detailed guidance will be set out in a Supplementary Planning Document.
- 4) The affordable housing secured through developer contributions should be broken down by tenure as follows:
 - 25% First Homes
 - 15% Shared Ownership
 - 60% Social Rent or Affordable Rent

National Wheelchair Accessibility Standards

- 5) All developments of ten homes or more should provide a proportion of wheelchair accessible housing, where this is financially viable. The minimum proportion that should be provided is:
 - a. On all brownfield sites*, and on greenfield sites* in lower value zones: 20% of homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings,
 - b. On greenfield sites* in medium or higher value zones: 15% of homes to meet the optional Building Regulations Requirement M4(3): Wheelchair User Dwellings and all remaining homes to meet the optional Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings.
- 6) Other than for reasons of financial viability, these requirements will only be reduced where it can be demonstrated that any of the following apply:
 - a. It is not practically achievable given the physical characteristics of the site, or
 - b. Site specific factors mean that step-free access to the dwelling cannot be achieved, or
 - c. The homes are located on the first floor or above of a non-lift serviced multi-storey development.

Self-Build and Custom-Build Plots

- 7) On developments of 100 homes or more, where there is currently a need identified in the self-build and custom-build register for the local authority, at least 5% of plots should be made available for self-build or custom-build, or sufficient to match the current number on the register if lower. Any plots that have not been sold after 12 months of appropriate marketing will revert to the developer to build.

Financial Viability Assessments

Policy DLP12 – Delivering Affordable, Wheelchair Accessible and Self-Build / Custom-Build Housing

- 8) On sites where applying the affordable housing or wheelchair accessibility requirements can be demonstrated to make the development unviable, the maximum proportion of such housing will be sought that will not undermine the viability of the development, subject to achieving optimum tenure mix and securing other planning obligations necessary for the development to gain planning permission.
- 9) Financial viability assessments conforming to national guidance will be required to be submitted and, where necessary, independently appraised by an appropriate professional appointed by the local planning authority at the cost of the applicant. Flexible arrangements will be sought through planning agreements, wherever possible, to allow for changing market conditions in future years. Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances, and in such circumstances an executive summary will be made publicly available.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP12	0	0	0	0	0	0	0	0	0	+	+	+	0	0

- D.5.3.1 Policy DLP12 would help to ensure that, throughout the Plan area, DMBC delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy sets out the requirements for proportions of affordable housing to be delivered within developments of ten dwellings or more and on greenfield/brownfield sites, to ensure that suitable residential development is provided to meet the social and economic needs of the population.
- D.5.3.2 The policy could be strengthened by including wording to ensure that the affordable housing provided will remain affordable in perpetuity.
- D.5.3.3 It is important for future residential development to consider accessibility requirements for the elderly and those with specific needs. Policy DLP12 would be likely to help ensure residential developments allow for the safe and convenient access for all residents, including older people and wheelchair users.
- D.5.3.4 This policy also seeks to meet the needs of those wishing to build their own homes. The policy aims to secure a 5% of major developments of 100 units or more to be available for self-build housing. This would help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents within the borough.
- D.5.3.5 Overall, Policy DLP12 would be anticipated to result in minor positive impacts in relation to housing, equality and health (SA Objectives 10, 11 and 12).

D.5.4 Policy DLP13 – Supported Accommodation

Policy DLP13 – Supported Accommodation

- 1) The Council will support the provision of accommodation for people with specific needs, where a need has been identified. Proposals providing accommodation for people with specific needs, including care homes and extra care facilities will be considered in relation to the following criteria;
 - a. Accessibility to public transport links and key local services
 - b. Compatibility with either adjacent use and resulting impact on the character and adequate level of overall amenity of the surrounding area
 - c. Provision for sufficient parking for residents, staff and visitors, and manoeuvring of vehicles and impact on highway safety
 - d. Provision of private amenity space or be in close proximity to an area of public open space.
- 2) Development proposals should be consistent with other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP13	0	+	0	0	0	0	0	0	+	+	+	+	0	0

D.5.4.1 Policy DLP13 will help to provide housing for a mixture of residents including the elderly and those with specific needs and sets out requirements for such development proposals. Policy DLP13 promotes social inclusion and will help meet housing needs, therefore, a minor positive impact on housing and equality can be expected (SA Objectives 10 and 11). Furthermore, by providing care homes and extra care facilities for residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. A minor positive impact on health and wellbeing would be expected (SA Objective 12).

D.5.4.2 This policy aims for supported accommodation to have good access to public transport and local services, be compatible with adjacent land uses, and provide amenity space (or access to existing public open space). Minor positive impacts could therefore be expected for landscape and transport (SA Objectives 2 and 9), as well as for health and wellbeing (SA Objective 12).

D.5.5 Policy DLP14 – Housing Development, Extensions and Alterations to Existing Dwellings

Policy DLP14 – Housing Development, Extensions and Alterations to Existing Dwellings

- 1) Housing development, residential conversions, extensions, and alterations to existing dwellings will be supported when:
 - a. The design of the development is of an appropriate form, scale and mass and is sited appropriately,

Policy DLP14 – Housing Development, Extensions and Alterations to Existing Dwellings

- b. Materials which respect and are responsive to the context and character of the area are used – unless the proposal can be assessed as being significantly innovative, particularly in terms of sustainable measures or outstanding design. In the case of residential conversions, extensions and alterations, the development shall not have a detrimental impact on the character, form, and design of the host dwelling,
- c. The development is appropriate in its locality and would not cause unacceptable harm to the amenities of the occupiers of neighbouring dwellings, including harm arising from loss of privacy, outlook, and sunlight – considering factors such as levels, orientation, and the separation of development,
- d. An appropriate level of amenity shall be provided for future occupiers of the development, including the provision of adequate accessible space for the storage and collection of household waste,
- e. The development would provide adequate access, parking, and provision for the manoeuvring of vehicles, with no detrimental impact on highway safety and the free flow of traffic,
- f. Housing development is sited on previously developed land and on sites in sustainable locations, close to public transport facilities and links.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP14	0	+	0	0	0	+	0	0	0	0	0	0	0	0

D.5.5.1 Policy DLP14 looks to protect and manage the character and appearance of Dudley’s landscape by supporting proposals for conversions, extensions or alternations to dwellings that use “*materials which respect and are responsive to the context and character of the area*”. By ensuring such proposals are in keeping with their surroundings and encouraging the use of innovative design, there is potential for the policy to have a minor positive impact on landscape (SA Objective 2). The policy also looks to locate housing development on previously developed land, and by supporting conversions and extensions it may help to reduce the overall land-take for new development; therefore, a minor positive impact on natural resources can be expected (SA Objective 6).

D.5.5.2 Policy DLP14 also supports developments that will mitigate light pollution, have adequate waste storage and collection facilities, and that are located close to strong transport links. The policy would help to reduce the potential for adverse impacts on pollution, waste and transport, leading to an overall negligible impact on SA Objectives 7, 8 and 9.

D.5.6 Policy DLP15 – Accommodation for Gypsies and Travellers and Travelling Showpeople

Policy DLP15 – Accommodation for Gypsies and Travellers and Travelling Showpeople

- 1) New Gypsy and Traveller permanent pitches will be provided to meet identified needs up to 2041 as set out in Table x, (addendum) to Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022.
- 2) Accommodation need for Gypsies and Travellers and Travelling Showpeople over the Plan period will be met through sites with planning permission, allocated sites and other sites granted planning permission during the Plan period in accordance with the criteria set out below. Dudley Council will pursue funding and / or management arrangements for new sites, or expansion of sites where necessary.
- 3) Applications for permanent Gypsy and Traveller pitches and Travelling Showpeople plots will only be supported where all of the following criteria are met:
 - a. The site should be suitable as a place to live, particularly regarding health and safety, and the development should be designed to provide adequate levels of privacy and amenity for both occupants and neighbouring uses.
 - b. The site should meet moderate standards of access to residential services as set out in Policy DLP11
 - c. The site should be located and designed to facilitate integration with neighbouring communities.
 - d. The site should be suitable to allow for the planned number of pitches, an amenity block, a play area, access roads, parking and an area set aside for work purposes where appropriate, including, in the case of Travelling Showpeople, sufficient level space for outdoor storage and maintenance of equipment.
 - e. There is safe and convenient pedestrian and vehicular access to and from the public highway and adequate space for parking and manoeuvring within the site
 - f. There is no conflict with other relevant policies such as those relating to the protection of the Green Belt, other greenfield land and industrial land, local distinctiveness and those concerned with development within areas at risk of flooding or on contaminated land.
 - g. The site should be served or capable of being served by adequate on-site services for water supply, power, drainage, sewage, waste disposal (storage and collection) and recycling.
- 4) The location, design and facilities provided on new sites will be determined in consultation with local Gypsies and Travellers and Travelling Showpeople and will also consider / reflect any available national guidance. Proposals should be well designed as set out in Policy DLP4.
- 5) Existing Traveller sites will be safeguarded and their redevelopment or use for other purposes will be opposed, unless there is evidence either that a suitable replacement with equivalent capacity has been provided elsewhere or that the existing site is no longer required to meet identified need.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP15	+/-	0	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+	+/-	+

- D.5.6.1 In accordance with the planning policy for traveller sites², Gypsies and Travellers are defined as *"persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- D.5.6.2 Travelling Showpeople are defined as *"members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*³.
- D.5.6.3 This policy would be expected to meet the identified pitch/plot targets for Gypsies and Travellers and Travelling Showpeople, in accordance with the latest GTAA, and so would likely have a minor positive impact on housing provision (SA Objective 10).
- D.5.6.4 The policy would also be expected to have a minor positive impact on equality, as the provision of pitches and plots will help to ensure that a diverse range of residents in Dudley have access to appropriate accommodation to suit their needs (SA Objective 11).
- D.5.6.5 The criteria set out in Policy DLP15 suggests sites integrate with neighbouring communities, include play areas and access roads, and have adequate access to on site services including water supply, power, drainage, sewage, waste disposal and recycling. These requirements would be expected to result in minor positive impacts in regard to waste, transport and accessibility, equality, health and education (SA Objectives 8, 9, 11, 12 and 14).
- D.5.6.6 The policy states that applications for Gypsy, Traveller and Travelling Showpeople pitches/plots will be supported provided there *"is no conflict with other relevant policies such as those relating to the protection of ... local distinctiveness"* and requires sites to be *"well designed and laid out"*. These measures could reduce the likelihood of adverse effects on the local landscape, leading to an overall negligible effect on SA Objective 2.
- D.5.6.7 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. It should be noted that reasonable alternative sites for Gypsy, Traveller and Travelling Showpeople use have been evaluated through the SA process (see **Appendix C**).

D.5.7 Policy DLP16 – Education Facilities

Policy DLP16 – Education Facilities

- 1) New nursery, school and further and higher education facilities should be:
 - a. Well-designed and complement and enhance neighbourhood services and amenities,

² MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 21/07/23]

³ Ibid

Policy DLP16 – Education Facilities

- b. Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area,
 - c. Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy DLP11, particularly where a significant amount of new housing is proposed.
- 2) New and improved facilities will be secured through a range of funding measures. Where a housing development of ten or more homes would increase the need for education facilities to the extent that new or improved facilities would be required to meet this need, planning obligations or Community Infrastructure Levy will be secured sufficient to meet the need, where this is financially viable. For strategic allocations, the likely requirement for on-site provision of new schools is set out in DLP Part Two. Where land is provided for a new school as part of a housing development, the financial contribution made by that development towards education facilities will be reduced accordingly.
 - 3) On sites where the education facility requirement is proven not to be viable, the maximum proportion of funding will be sought that will not undermine the viability of the development, subject to securing other planning obligations necessary for the development to gain planning permission. A financial viability assessment will be required to be submitted.
 - 4) New and redeveloped education facilities should include provision for wider community use of sports and other facilities where appropriate.
 - 5) The existing network of education facilities will be protected and enhanced. The physical enhancement and expansion of higher and further educational facilities and related business and research will be supported where it helps to realise the educational training and research potential of the Dudley Borough. Proposals involving the loss of an education facility will be permitted only where adequate provision is available to meet the needs of the community served by the facility.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP16	0	0	0	+	0	0	+	0	+	0	+	+	+	++

D.5.7.1 Policy DLP16 seeks to support the development or expansion of education facilities secured through a range of funding measures, including planning obligations or through the Community Infrastructure Levy (CIL). New facilities would be required to be in accordance with the criteria set out in the policy. The policy also aims to protect and enhance existing education facilities. This policy would therefore be expected to have a major positive impact on education (SA Objective 14).

D.5.7.2 Improved access to education would also be likely to have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable in many employment sectors. The policy seeks to address accessibility gaps and ensure all residents have good access to educational facilities via public transport. Therefore, this policy would be likely to have a minor positive impact on transport and accessibility, equality and the local economy (SA Objectives 9, 11 and 13).

D.5.7.3 The policy also states that new education facilities should be *"well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area"*. This could potentially result in a minor positive impact on climate change mitigation and pollution, by reducing reliance on travel via car and consequently reducing emission of GHGs and harmful pollutants (SA Objectives 4 and 7).

D.5.7.4 In addition, this policy seeks to ensure that *"new and redeveloped education facilities should include provision for wider community use of sports and other facilities where appropriate"*. This would be expected to have a minor positive impact on the health of local residents (SA Objective 12).

D.5.8 Policy DLP17 – Houses in Multiple Occupation

Policy DLP17 – Houses in Multiple Occupation

- 1) Proposals for the creation of Houses in Multiple Occupation, including the conversion of buildings or subdivision of dwellings, will be permitted provided that:
 - a. The development would not result in the loss of family-sized dwellings in areas where there is a proven demand for such accommodation.
 - b. The development is unlikely to be detrimental to the amenities of the occupiers of adjoining or neighbouring properties by way of noise, overlooking, general disturbance, or impact on visual amenity.
 - c. The development would not have a significant adverse impact on the character and appearance of the area, including the historic and natural environment.
 - d. Provision for off- and on-street car and cycle parking is sufficient and appropriately incorporated and would not have an adverse impact on the surrounding area by way of increased on-street parking, impaired highway safety or impeding proper access to the area.
 - e. The site is in an area that has good access by walking and public transport to residential services, as set out in Policy DLP11.
 - f. The development meets policy DLP39, national space standards and provides a satisfactory standard of living accommodation, to ensure that the occupiers have adequate floor space and the internal layout is shown to be suitable for the number of units proposed in terms of daylight, outlook, and the juxtaposition of living rooms and bedrooms.
 - g. Adequate provision is made for the storage and disposal of refuse and recycling.
 - h. Adequate provision of residential amenity is made, including outdoor amenity space for sitting out, play, and drying clothes, and for external storage space, including cycle storage.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP17	0	0	0	0	0	0	0	0	+	+	+	+	0	0

- D.5.8.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy DLP17 supports the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy. This would be likely to provide a range of housing options to residents of Dudley, and therefore, a minor positive impact on housing and equality would be expected (SA Objectives 10 and 11).
- D.5.8.2 This policy seeks to ensure development proposals are located in areas which have "*good access by walking and public transport to residential services*". This would be expected to have a minor positive impact on transport and accessibility and could potentially encourage outdoor exercise and active travel, with benefits to human health and wellbeing (SA Objectives 9 and 12).
- D.5.8.3 In addition, the policy seeks to ensure the development of any HMOs would not significantly impact cultural heritage, landscape, pollution or waste, resulting in a likely overall negligible impact on SA Objectives 1, 2, 7 and 8.

D.6 Employment

D.6.1 Policy DLP18 –Economic Growth and Job Creation

Policy DLP18 - Economic Growth and Job Creation

- 1) Dudley Council will seek to deliver at least 72 hectares of new employment land between 2020 to 2041* through:
 - a. the development of Employment Opportunity Sites allocated within this Plan, equal to 24ha, with that figure including completions since 2020.
 - b. the redevelopment, intensification, conversion and enhancement of existing employment areas and premises, including the development of small opportunity sites (sites between 0.25 ha and 0.4 ha).
 - c. the Duty to Cooperate process: the development of employment sites outside of the borough, which have an evidenced functional economic link to Dudley Borough.
- 2) The plan will deliver a portfolio of sites of various sizes to meet a range of business needs, with an emphasis on the development of sites to support growth of the borough and future demand.
- 3) The allocated Employment Opportunity Sites, as shown on the Policies Map, will be safeguarded for industrial employment uses within Use Classes E(g) (ii), E(g) (iii), B2 and B8.
- 4) The council will support the regeneration and renewal of designated Strategic and Local Employment Areas and, as appropriate, Other Employment Areas, especially those Local Employment Areas which are located within designated Regeneration Corridors and identified as Industrial Renewal Areas on the Policies Map, to enable Dudley Borough’s employment areas to be fit-for-purpose in the long term, and to grow and rejuvenate the local economy, especially through:
 - a. environmental enhancements.
 - b. access improvements, including for pedestrians and cyclists.
 - c. the incorporation of renewable energy measures, and, as appropriate, installations measures and/or facilities which contribute towards a circular economy approach.
 - d. the marketing and promotion of employment areas, and
 - e. with particular regard to Local Employment Areas, opportunities to enable those areas to be more open to, and inclusive of, the local communities which they serve.

*The need for the replacement of an additional 26ha of existing employment land because of losses to alternative developments will be monitored over the Plan period.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP18	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-

D.6.1.1 Policy DLP18 sets out the allocation of 24ha of employment land for the period between 2020-2041, which also includes completions since 2020. The Black Country Economic

Development Needs Assessment (EDNA) update (2023) identifies a demand for 72ha of employment land for Dudley MBC between 2020 and 2041. Aiming to deliver further employment land to address this shortfall, Policy DLP18 states that further employment land will be delivered through “*redevelopment, intensification, conversion and enhancement of existing employment areas and premises*” and development of employment sites outside the borough that have “*an evidenced functional economic link to Dudley borough*”.

D.6.1.2 Assuming that 72ha employment land can be delivered in line with this policy to satisfy the identified needs, a major positive impact on the economy would be expected (SA Objective 13).

D.6.1.3 An uncertain impact has been identified on the remaining SA Objectives as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics for new employment sites or redevelopments which come forward as a result of this policy. Potential locations for employment development are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C**).

D.6.2 Policy DLP19 – Strategic Employment Areas

Policy DLP19 – Strategic Employment Areas	
1)	Strategic Employment Areas are identified on the Policies Map, and are characterised by excellent accessibility, high-quality environments and clusters of high technology growth sector businesses.
2)	These areas will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8.
3)	Within Strategic Employment Areas, high-quality development or redevelopment of sites and premises will be required, and proposed development that prejudice or dilutes the delivery of appropriate employment activity, or deters investment in such uses, will be refused.
4)	Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii), and Class B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets of less than 280m ² , may also be permitted in Strategic Employment Areas, where they can be shown to strongly support, maintain or enhance the business and employment function of the area and meet sequential and other national or local policy tests as necessary.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP19	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-

D.6.2.1 Policy DLP19 seeks to allocate Strategic Employment Areas within the borough, which correspond to areas of highest market demand and are characterised by “*clusters of high technology growth*”. This would be likely to have benefits to the local economy, as

employment land would be located in desirable areas and would provide technology to enable businesses to thrive, with associated opportunities for employment. Therefore, a minor positive impact can be expected for the local economy (SA Objective 13).

D.6.2.2 The policy states that Strategic Employment Areas will be characterised by "*excellent accessibility*", which would be expected to ensure residents have good access to employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility would be likely (SA Objective 9).

D.6.2.3 At present, an uncertain impact has been identified for the remaining SA objectives (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12 and 14). The extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics for new employment sites or redevelopments which come forward as a result of this policy. Potential locations for employment development are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C**).

D.6.3 Policy DLP20 – Local Employment Areas

Policy DLP20 – Local Employment Areas	
1)	Local Employment Areas are shown on the Policies Map and are characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees.
2)	These areas will have a particular focus on providing for the needs of locally based investment and will be safeguarded for the following uses: <ul style="list-style-type: none"> a. industry and warehousing - Classes E(g)(ii), E(g)(iii), B2 and B8. b. motor trade activities, including car showrooms and vehicle repair and testing premises. c. haulage and transfer depots. d. wholesale trade and builders’ merchants. e. scrap metal, timber and construction premises. f. waste collection, transfer and recycling uses.
3)	Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii) and Class B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets of less than 280m ² , may also be permitted in Local Employment Areas, where they can be shown to strongly support, maintain or enhance the business and employment function of the area; and meet sequential and other national or local policy tests as necessary.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP20	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-

- D.6.3.1 Policy DLP20 seeks to allocate Local Employment Areas to support the provision of industrial, logistics and commercial activities which would be likely to result in benefits for the local economy and provision of local employment opportunities. This policy would therefore be likely to have a minor positive impact on the economy (SA Objective 13).
- D.6.3.2 Policy DLP20 also seeks to safeguard areas for "waste collection, transfer and recycling uses". This policy would therefore be expected to have a minor positive impact on waste, by supporting the efficient management and disposal of waste (SA Objective 8).
- D.6.3.3 An uncertain impact has been identified on the remaining SA Objectives (SA Objectives 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12 and 14). The extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics for new employment sites which come forward as a result of this policy. Potential locations for employment development are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C**).

D.6.4 Policy DLP21 – Other Employment Areas

Policy DLP21 – Other Employment Areas

- 1) For employment areas that are not designated as either Strategic Employment Areas or Local Employment Areas on the Policies Map, but which comprise existing occupied employment land within Dudley Borough, will be classed as Other Employment Areas, and will either be:
 - a. retained and enhanced for industrial employment uses within Class E(g)(ii), E(g)(iii)), and Class B2 and B8, and allowed to be developed for such uses, or
 - b. be redeveloped for housing, or
 - c. where the Other Employment Area can be evidenced as being easily and safely accessible via a direct footpath link to the boundary of a designated centre, for community, entertainment, food and drink, or leisure and recreation uses.
- 2) Development or uses under 1(b) or 1(c) will only be acceptable where there is robust evidence to demonstrate to the satisfaction of the council, that:
 - a. the site is no longer required for industrial employment purposes, including the possible relocation of displaced employment uses from other parts of the Dudley Borough.
 - b. the site is no longer viable for industrial employment uses.
 - c. there are satisfactory arrangements in place for the relocation of existing occupiers of the employment uses on the site, particularly within the local area.
 - d. the site could be brought forward for housing in a comprehensive manner and would not lead to piecemeal development.
 - e. residential development or development under 1 (c), would not adversely affect the ongoing operation of existing or proposed employment uses on the site or nearby to the site.
 - f. the site is suitable for housing or other non-ancillary non-employment uses in accordance with local or national policies relating to those uses.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP21	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

D.6.4.1 The policy outlines the use of ‘other employment areas’ outside of the defined Strategic and Local Employment Areas that will be “*retained and enhanced for industrial employment uses within Class E(g)(ii), E(g)(iii), and Class B2 and B8, and allowed to be developed for such uses*”, which would be likely to increase the provision of employment floorspace across the borough. A minor positive impact on employment opportunities and the economy would be expected (SA Objective 13).

D.6.4.2 This policy will support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, the policy could potentially result in a minor positive impact on local housing provision (SA Objective 10).

D.6.4.3 An uncertain impact has been identified on the remaining SA Objectives (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 and 14). The extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics for new employment sites which come forward as a result of this policy. Potential locations for employment development are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C**).

D.6.5 Policy DLP22 – Balancing Employment land and Housing and Protecting the Viability and Integrity of existing Industrial and Business uses

Policy DLP22 – Balancing Employment land and Housing and Protecting the Viability and Integrity of existing Industrial and Business uses

- 1) Before releasing any employment land in Dudley we will first ensure the retention of an adequate supply of occupied and available employment land to meet defined needs as set out in Policies DLP19, DLP20 and DLP21. We will consider the availability of employment land within the area, the quality of the site and its geographical market. In areas identified for new housing we will positively plan to facilitate housing growth by:
 - a. Encouraging any existing operation which by virtue of the scale and nature of operations, traffic generation and other amenity considerations may restrict the regeneration of the area to relocate. This relocation will be facilitated with the full support of the local authority concerned, provided that suitable alternative sites and premises are available.
 - b. Resist new development where this may restrict the regeneration of the area by virtue of the scale and nature of operations, traffic generation and other amenity considerations. Existing businesses who may wish to redevelop or extend their premises will be encouraged to relocate

Policy DLP22 – Balancing Employment land and Housing and Protecting the Viability and Integrity of existing Industrial and Business uses

with the full support of the local authority, provided that suitable alternative sites and premises are available.

- 2) Where new non-industrial development is proposed near to an existing business (E(g) (ii) (iii), B2 and B8) site, particularly where those non-industrial uses may threaten the viability of the neighbouring industrial use or the integrity of the wider industrial area, such a proposal will only be permitted;
 - a. if the site is no longer viable and required either for employment use, including relocation of businesses displaced from sites released to other uses, or for other employment-generating uses.
 - b. if it can be demonstrated that the new non-industrial development would not adversely affect the continued viability and operation of the existing business use, and suitable mitigation measures can be built into the new proposal to address such concerns as necessary. Where this is to be achieved by way of a buffer, the new development will be required to provide and maintain the buffer.
- 3) Any proposals resulting in the loss of employment land should demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing existing and neighbouring uses. Incremental development will only be allowed where it would not prejudice master planning of the wider area.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLP22	0	0	0	0	0	+	0	0	0	+	0	0	+	0

- D.6.5.1 Policy DLP22 sets out measures to ensure that the supply of employment land is sufficient to meet the needs of the area before releasing land for residential use. The policy states that the Council will *"consider the availability of employment land within the area, the quality of the site and its geographical market"*. The measures in the policy would be expected to have a minor positive impact on employment floorspace provision (SA Objective 13).
- D.6.5.2 The policy includes measures that ensure housing growth is facilitated. By considering the potential to release surplus employment land for housing development, this would contribute towards meeting the identified needs. Therefore, the policy would be expected to have a minor positive impact on housing provision (SA Objective 10).
- D.6.5.3 Policy DLP22 includes measures that would contribute towards the protection of undeveloped land within the borough, utilising the supply of developed land previously used for employment. Therefore, the policy could lead to a minor positive impact on the conservation of natural resources and efficient use of land (SA Objective 6).
- D.6.5.4 The policy states that new development will be resisted *"where this may restrict the regeneration of the area by virtue of the scale and nature of operations, traffic generation*

and other amenity considerations". The policy would help to ensure that traffic is managed, which would ensure that there would not be additional pollutants emitted that would compromise local air quality. Furthermore, the policy would ensure that the amenity of the area is protected, ensuring that the nature and scale of the proposed development is appropriate in terms of surrounding land uses, reducing the potential for adverse effects on site end users. Overall, the policy would be expected to have a negligible impact on landscape and pollution (SA Objectives 2 and 7).

D.6.6 Policy DLP23 – Social Value

Policy DLP23 – Social Value	
1)	Planning applications for new major job-creating development will be required to demonstrate how job opportunities arising from the proposed development will be made available to the residents of Dudley Borough, particularly those in the most deprived areas and priority groups.
2)	Planning conditions or obligations will be applied as appropriate to secure initiatives and/or contributions to a range of measures to benefit the local community, including the potential for working with local colleges and universities, to ensure the provision of: <ul style="list-style-type: none"> a. training and support to assist local residents in accessing employment opportunities b. improved accessibility of the development to residents by a choice of modes of transport c. child-care facilities, and d. measures to assist those with physical or mental health disabilities to access employment opportunities
3)	As appropriate, the council will also require applicants of proposals for new major job-creating development to make financial or other contributions secured through planning obligations, Community Infrastructure Levy (CIL) / Infrastructure Levy monies or other suitable means, to provide social value.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP23	0	0	0	0	0	0	0	0	+	0	+	+	+	+

D.6.6.1 Policy DLP23 will support equal job opportunities within the borough, helping to tackle unemployment issues through requiring developers to demonstrate that development will benefit deprived areas and priority groups. Therefore, the policy would be expected to result in a minor positive impact on the local economy and equality within the borough (SA Objectives 11 and 13).

D.6.6.2 The policy outlines planning conditions or obligations that can benefit the education of local residents within the borough, provided by securing *"initiatives and/or contributions to a range of measures to benefit the local community, including the potential for working with local colleges and universities"*. Therefore, the policy could potentially result in a minor positive on local education (SA Objective 14).

- D.6.6.3 The policy also outlines the requirement for financial contributions to be made through the Community Infrastructure Levy / Infrastructure Levy from major job-creating development, that can be beneficial to the social value of the local area.
- D.6.6.4 Initiatives outlined in the policy identify that provision of “*improved accessibility*” and “*measures to assist those with physical or mental health disabilities to access employment opportunities*” will be secured. These measures would be expected to have a minor positive impact on the transport infrastructure within the local area and the health of residents (SA Objectives 9 and 12).

D.7 Centres and Town Centre Uses

D.7.1 Policy DLP24 – Dudley Borough Centres

Policy DLP24 – Dudley Borough Centres

- 1) The priority for Dudley's Centres is to ensure they remain focused on serving the needs of their communities while enabling centres to repurpose and diversify by providing a well-balanced mix of commercial, business and service functions. This includes both retail provision and a mix of leisure, office, residential and other appropriate, complementary town centre uses that are accessible by a variety of sustainable means of transport.
- 2) The hierarchy of Dudley's Centres is set out in Table 10.1:
 - a. Brierley Hill Strategic Centre (Tier One Centre)
 - b. Dudley, Halesowen and Stourbridge Town Centres (Tier Two Centres)
 - c. Kingswinford, Lye and Sedgley District Centres (Tier Three Centres)
 - d. A Network of Local Centres (Tier Four Centres)
 - e. Other small centres, including small parades of shops
- 3) This hierarchy of centres will be supported, and the Council will ensure that developments in centres is facilitated in a manner that reflects their scale, role and function, and resisting proposals that would undermine this strategy.
- 4) The council will allot for the delivery of additional convenience retail floorspace within Dudley Town Centre preferably in the form of an anchor food retail store, evidenced as a qualitative need in order to help sustain that centre's vitality and viability.
- 5) To enable the diversification and improve the vitality of Dudley Centres the following range of uses are considered acceptable unless a site-specific use has been identified in a site allocation policy:
 - a. At ground floor within the Tier one and Tier 2 designated Town Centre Core Areas:
 - i. Class E uses, excluding Research and development of products or processes E(g(ii)) and industrial processes E(g(iii))
 - ii. Drinking establishments and Public Houses (Sui-Generis)
 - b. At upper floors within the Town Centre Core Areas or outside of the Town Centre Core areas but within the Centre Boundaries or all centres:
 - i. Uses falling with Class E, subject to the provisions of Policy DLP27
 - ii. Drinking establishments and public houses (Sui-Generis)
 - iii. Learning and non-residential institutions, including places of further education, museums and places of worships (F1 uses)
 - iv. Community halls or meeting places, areas for outdoor sport and recreation, including, sports stadia and indoor and outdoor swimming pools and skating rings (F2 uses)
 - v. Hot Food Takeaways (Sui Generis), subject to the provisions of Policy DLP29
 - vi. Cinemas, theatres, laundrettes, amusement arcades, music and concert halls, casinos, night clubs, betting offices, payday loan shops, bingo and dance halls (Sui- Generis)
 - vii. Residential developments (C3)
 - viii. Hotels (C2)

Policy DLP24 – Dudley Borough Centres

- 6) Measures to enhance the vitality, accessibility and sustainability of centres, including maximising public realm, open space, provision of green infrastructure and vehicle charging points, will be supported.
- 7) New housing and employment development should have their service needs met by, and contribute to the regeneration of, the existing network of centres.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP24	+/-	+	+/-	+	+	+	+	0	+	+	+	+	+	0

- D.7.1.1 Policy DLP24 aims to ensure centres in the borough provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civic services. The strategic centre (Tier One) in Dudley is Brierley Hill. There are three town centres (Tier Two): Dudley, Stourbridge, Halesowen. There are three district centres (Tier Three): Kingswinford, Lye and Sedgley. A network of local centres (Tier Four) and other small centres, including small parades of shops, are also present.
- D.7.1.2 The hierarchy of centres as set out under this policy would be likely to ensure a range of retail, leisure, office space and other facilities are provided at these locations which are appropriate to meet the local need, reflecting the appropriate scale, role and function of each type of centre. This would be expected to have benefits to the local community by ensuring all residents have access to essential services, and the local economy through encouraging economic regeneration. Policy DLP24 also supports development of community facilities including community halls and meeting spaces at upper floors within town centres, encouraging social interaction. Therefore, the policy would be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13).
- D.7.1.3 Through supporting a balanced mix of land uses including residential development, the policy could lead to a minor positive impact on housing provision (SA Objective 10).
- D.7.1.4 The policy seeks to ensure development proposals within centres are *"accessible by a variety of sustainable means of transport"* and *"enhance the vitality, accessibility and sustainability of centres"*. This policy would be likely to encourage residents to live healthy lifestyles by supporting active travel and reducing the need to travel long distances for services to meet day-to-day needs. Residents would also be encouraged to use public transport, which would subsequently reduce the number of cars on the road network, with likely benefits for carbon emissions, congestion and air quality. A minor positive impact is identified in relation to climate change mitigation, pollution, transport and health (SA Objectives 4, 7, 9 and 12).
- D.7.1.5 The policy states that *"new housing and employment development should have their service needs met by, and contribute to the regeneration of, the existing network of*

centres”. The promotion of urban regeneration, as well as the support set out in the policy for use of upper floors within town centres, would be likely to have a minor positive impact in relation to natural resources, by encouraging the efficient use of previously developed land and reducing the quantity of greenfield land that would be lost to development (SA Objective 6).

D.7.1.6 In addition to regeneration being encouraged, with potentially to improve the appearance of centres, the policy also sets out support for measures which would enhance the public realm through provision of open space and green infrastructure. This could contribute towards a minor positive impact on the character of the townscape (SA Objective 2), and potentially on climate change adaptation through increasing green cover within the urban area (SA Objective 5).

D.7.1.7 The type, scale and quantity of development that may be directed to each of the identified centres under this policy is currently not known as this policy sets out the strategic context, priorities, and approach to the Dudley Borough’s centres. At present, uncertain impacts have been identified for cultural heritage, landscape, biodiversity and climate change adaptation (SA Objectives 1, 2, 3, 5).

D.7.1.8 The policy would be expected to have a negligible impact on waste and education (SA Objectives 8 and 14).

D.7.2 Policy DLP25 – Local and District Centres and Local Services

Policy DLP25 – Local and District Centres and Local Services

Designated District and Local Centres

- 1) It is a priority for tier three centres to serve the day-to-day shopping and service needs of the communities that they serve. Convenience retail developments and proposals to extend or refurbish existing food store where they are well integrated with the centre and meet the requirements of DLP26 and DLP27 will be supported.
- 2) Developments within District and local centres should reflect the scale, character and nature of the centre and help the centres role and function in serving the local needs, and sustain the economic viability and vitality of the centre. All new developments will need to be sensitive to the local character and enhance the public realm of the centre.
- 3) Proposals should reduce the need to travel, and promote the use of sustainable transport methods, including public transport, walking and cycling.

Parades and Local Shops

- 4) Within retail parades outside of designated centres, small scale commercial uses (Class E) and community facilities would be supported where the proposal would not result in the parade being unable to meet the day-to-day needs and it can be demonstrated that:
 - a. The proposal meets the provisions of DLP26.
 - b. The proposal would retain an active frontage.
 - c. The development would not either individually or cumulatively had a detrimental impact on the amenity of local residents, due to noise, odour or highway safety.
 - d. Would not impact on the viability or vitality of any designated centres.

Policy DLP25 – Local and District Centres and Local Services

- 5) Development involving the loss of valued local services, Local Shops (F.2) and community facilities, including public houses, particularly where the facility serves a community within a defined accessible neighbourhood will be refused, unless it can be demonstrated that:
- the use is no longer viable, by providing evidence that the property has been actively and appropriately marketed for a minimum of 6 months, and that the use cannot be viably sustained.
 - There is an alternative or similar facility available within a safe and reasonably achieved 1000m walking distance.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP25	0	0	0	+	0	0	0	0	+	0	+	+	+	0

- D.7.2.1 Policy DLP25 supports development and diversification within the 15 local centres and three district centres in Dudley. Development proposals which would increase retail provision, jobs and services would be supported under this policy. The policy seeks to ensure that development within local and district centres are capable of *"serving the local needs, and sustain the economic viability and vitality of the centre"*.
- D.7.2.2 The policy outlines that proposals should *"reduce the need to travel, and promote the use of sustainable transport methods, including public transport, walking and cycling"*. The policy will encourage healthy lifestyles through supporting active travel, which can also help reduce congestion and road traffic.
- D.7.2.3 The specifications of Policy DLP25 would be likely to provide improved employment opportunities and retail developments to boost the local economy as well as accessibility and equality, by helping to ensure all residents have good access to a range of services and facilities by providing community uses within centres. Through seeking to support local parades and shops, the policy could also facilitate social interaction and community cohesion, with further benefits to equality and wellbeing.
- D.7.2.4 Overall, this policy would be likely to have minor positive impact in relation to accessibility, equality, health and economy (SA Objectives 4, 9, 11, 12 and 13).

D.7.3 Policy DLP26 – Small Scale Local Facilities

Policy DLP26 –Small Scale Local Facilities

- 1) Proposals including the extensions to existing floorspace for small-scale local facilities for main town centre uses as identified in national planning policy guidance, will be permitted in edge of out-of-centre locations, where the new or extended unit, does not exceed 280sqm(gross) of floorspace, subject to the following requirement being met:

Policy DLP26 – Small Scale Local Facilities

- a. The proposal does not unduly impact on the health and wellbeing of the community it is intended to serve
- b. The proposal is of an appropriate scale and nature to meet the specific day-to-day needs of a population with convenient, safe walking distance for new or improved facilities, with particular reference to accessible neighbourhoods.
- c. Existing facilities that meet day-to-day needs will not be undermined
- d. Access to the proposal by means other than by car can be demonstrated and will be improved.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP26	0	0	0	0	0	+	0	0	+	0	+	+	+	0

D.7.3.1 Policy DLP26 sets out requirements for proposals relating to small-scale local facilities, seeking to ensure that they will “*meet the specific day-to-day needs of a population*”. The policy identifies supporting the principles of accessible neighbourhoods as a requirement and such proposals will need to provide access via “*means other than by car*”. The policy would help to promote active lifestyles through increasing accessibility to public services via walking and other sustainable transport modes which can boost the local economy and improve equality. Therefore, the policy would be expected to have a minor positive impact in relation to accessibility, health, equality, and the economy (SA Objectives 9, 11, 12, 13).

D.7.3.2 Policy DLP26 could also help to reduce the quantity of greenfield land needed for development through encouraging the extension of existing floorspace. A minor positive impact in relation to natural resources would therefore be expected (SA Objectives 6).

D.7.4 Policy DLP27 – Edge-of-Centre and Out-of-Centre Development

Policy DLP27 – Edge-of-Centre and Out-of-Centre Development

- 1) For main town centre uses, as defined by national planning policy guidance, within edge-of-centre or out-of-centre locations, above a locally set threshold of 280sqm (gross) of floorspace, a sequential test approach will be required.
- 2) For retail and leisure uses within edge-of-centre or out-of-centre locations, above a locally set threshold of 280sqm (gross) floorspace, both a Sequential Test and Retail Impact Assessment will be required.
- 3) For retail and leisure proposals within District and Local Centres, above a locally set threshold of 500sqm (net) floorspace, a Retail Impact Assessment will be required.
- 4) Edge-of-centre locations will be defined as follows:
 - a. For Strategic and Town Centres - retail uses (E(a)) a location within 400m of the Town Centre Core Area boundary. For other main town centre uses, within 400m of the Town Centre boundary.

Policy DLP27 – Edge-of-Centre and Out-of-Centre Development

b. For District and Local Centres – main town centre uses, adjoining the centre boundary.

- 5) Edge and out-of-centre proposals should be assessed for accessibility by a choice of modes transport, in particular sustainable transport means, including active travel links, and support both social inclusion and cohesion. Edge-of-centre proposals will need to demonstrate that they will be well-integrated with existing in-centre provision.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP27	0	0	0	+	0	0	+	0	+	0	+	+	+	0

D.7.4.1 Policy DLP27 sets out criteria for development proposals within edge-of-centre and out-of-centre locations. This policy could potentially have benefits to the local economy, by encouraging development to remain focused in centres, ensuring investment and regeneration are concentrated in areas that are most accessible. A minor positive impact on the economy would be expected (SA Objective 13).

D.7.4.2 This policy encourages development in centres which are highly sustainable locations. All development proposals under this policy would be required to be assessed for accessibility via public transport, *"in particular sustainable transport means"*. This would be expected to ensure all residents and visitors have safe and sustainable access to these facilities and *"support both social inclusion and cohesion"*.

D.7.4.3 By supporting access to edge-of-centre and out-of-centre developments via walking and cycling, this policy could potentially encourage active travel and facilitate healthy lifestyles. If there is adequate access via public transport, there could potentially be a reduction in private car use, having benefits to the climate, air pollution and congestion. Therefore, as the policy prioritises development in centres and assuming the assessments outlined in the policy would ensure sustainable access to out-of-centre developments is prioritised, this policy would be likely to have minor positive impacts in relation to climate change, pollution, transport, equality, and health (SA Objectives 4, 7, 9, 11 and 12).

D.7.5 Policy DLP28 – Residential Developments in Centres

Policy DLP28 – Residential Developments in Centres

- 1) Development proposals involving residential developments within Town, District and Local Centres, including the conversion or development of upper floors, the reuse of redundant buildings or new build developments, will be permitted provided that the following points are considered:
- That there is no unduly adverse effect on the amenities of the locality by means of design, appearance or traffic generation.

Policy DLP28 – Residential Developments in Centres

- b. That proposals maximise the potential use of the whole building including appropriate space for cycle storage and the storage and collection of household waste and recycling.
- c. A reduction in the level of parking against the standards normally required for residential development may be considered applicable, where the site is evidenced as being within a 400m walking distance of public transport.
- d. A reduction in the amount of amenity space against the standards normally required for residential development may be acceptable, where the reduced area comprises high quality landscaped public realm and/or overlooks and has ready access to an area of adjoining Public Open Space.
- e. That sound proofing measures for proposed residential units are properly considered.
- f. Development would not affect the vitality or viability of any existing business or use within its vicinity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP28	0	0	0	0	0	+	0	0	+	+	0	+	0	0

D.7.5.1 Policy DLP28 aims to increase the vitality of Dudley’s centres through encouraging residential developments in centres, provided that certain criteria are met as set out in the policy. The support for residential development in these areas could lead to a minor positive impact on housing provision (SA Objective 10).

D.7.5.2 Residential development in centres can provide greater access to transport links for residents and result in increased use of sustainable transport methods including public transport and active travel, with less dependency on travel by car. Therefore, the policy can be expected to have a minor positive impact on transport and health (SA Objectives 9 and 12).

D.7.5.3 The policy permits the conversion, development, and reuse of vacant and redundant buildings and outlines that *"proposals maximise the potential use of the whole building"*. Therefore, the policy can be expected to have a minor positive impact on natural resources through reducing the need for development on greenfield land and promoting an efficient use of buildings and urban land (SA Objective 6).

D.7.5.4 The policy outlines that development must not have any adverse impacts on local amenity *"by means of design, appearance or traffic generation"* and would ensure impacts on noise are considered. The policy can therefore be expected to have a negligible impact on the local character and air/noise pollution (SA Objectives 2 and 7).

D.7.6 Policy DLP29 – Hot Food Takeaways

Policy DLP29 – Hot Food Takeaways

- 1) All applications for Hot Food Takeaways (Sui-Generis), whether through new build or change of uses, will be assessed on their individual merits, subject to considerations on their location and the number, distribution and proximity of other Hot Food Takeaways and impact on the vitality and viability of centres.
- 2) Proposals for Hot Food Takeaways will be subject to provisions applicable to their locations:
 - a. Proposals for new Hot Food Takeaways, as a primary use of a planning unit, will not be permitted within a designated Town Centre Core Areas.
 - b. No more than two Hot Food Takeaways will be permitted adjacent to one another within the boundaries the borough’s centres or within retail parades.
 - c. Elsewhere, Hot Food Takeaways will be permitted where they do not give rise to, or exacerbate, a concentration (typically 3 or 4) of these uses.
 - d. Proposals for Hot Food Takeaways will not be supported where they are located outside of a Centre and within 400m of a secondary school⁴.
- 3) In all locations, planning permission for Hot Food Takeaways will only be granted where, there would not be an adverse impact on public or highways safety. Regard will be given to:
 - a. Existing traffic conditions, including availability of parking spaces.
 - b. Availability of safe legal loading areas
 - c. Proximity to junctions, pelican crossings, bus bays and bus stops
 - d. Accessibility of the site by public transport and cycling
- 4) Applications for Hot Food Takeaways within close proximity to residential properties will be refused where it is considered that there may be significant adverse impacts on residential amenity in terms of disturbance, vibrations, odours, traffic impacts, litter and hours of operation as a result of the proposal.
- 5) The cumulative impact of proposed Hot Food Takeaways will be assessed with regard to their risks around community safety, crime and disorder.
- 6) Wherever practicable, extract equipment should be accommodated internally within the building and routed within existing chimneys. Where external equipment is proposed, it should not be detrimental to the area or host property.
- 7) Health Impact Assessment is submitted with consideration given to the cumulative impact of Hot Food Takeaways within the vicinity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP29	0	0	0	0	0	0	0	0	0	0	+	+	0	0

⁴ The Exclusion Zones apply to Secondary Schools only as Primary School are pupils cannot go out at lunchtimes and the majority of journeys to and from school are made with a parent or guardian.

- D.7.6.1 Policy DLP29 aims to counteract the over-concentration of hot food takeaways in particular locations and provide a healthy balance of food choices across the borough.
- D.7.6.2 Planning applications for Hot Food Takeaways will be considered subject to the *"location and the number, distribution and the proximity of other Hot Food Takeaways"*. Reducing access to Hot Food Takeaways can help to promote healthier food choices and reduce inequality for those living in areas that would otherwise be located in areas densely populated by unhealthy food choices. By ensuring takeaway vendors are situated a suitable distance from schools, this could also help to encourage healthier choices for children and address childhood obesity issues. Therefore, the policy can be expected to have a minor positive impact on equality and health (SA Objective 11 and 12).
- D.7.6.3 The policy seeks to avoid adverse effects on local character from the activities of Hot Food Takeaways and sets out actions that must be followed in order for planning permission to be granted, including *"where external equipment is proposed, it should not be detrimental to the area or host property"*. Therefore, the policy can be expected to have a negligible impact on the local character (SA Objective 2).

D.7.7 Policy DLP30 – Shop Front Security

Policy DLP30 – Shop Front Security

- 1) The council will support a hierarchical approach to shopfront security with the preference for other security measures being fully exhausted before resorting to physical barriers such as an external grille or shutter. Early discussions with the Local planning authority are actively encouraged.
- 2) When considering security for a shopfront the following principles should be applied:
 - a. Within conservation areas, on listed and locally listed building, or where proposals affect the appearance or setting of a Heritage Asset, external roller grilles or shutters will not be permitted.
 - b. Security requirements should be carefully considered and integrated in the design of all new or replacement shopfronts, using the established Secured by Design approach.
 - c. Security fixtures should not be located on architectural features of the shopfront or building. Alarm boxes and security cameras, where deemed appropriate, should be positioned unobtrusively, having regard to the symmetry of the building.
 - d. Priority should be given to integrating physical measures (such as stallriser, smaller paned glass with mullions and transoms, the use of toughened or laminated glass etc.) into the design of existing and new shopfronts.
 - e. If additional security is deemed necessary priority should be given to the use of discreetly designed and retractable internal security shutters/grilles.
 - f. In circumstances where external security measures are agreed to be necessary, demountable external grilles of a visually appropriate design and colour should be considered.
 - g. To secure recessed doorways, retractable or folding gates can be used, however the use of roller shutters or in recessed doorways would be not supported.
- 3) External roller grilles or shutters will only be accepted if it has been clearly demonstrated that all other security options have been fully exhausted and where a departure from this stance can be justified. The Local Planning Authority will work with applicants to consider these options. In these circumstances, external roller grilles or shutters would only be acceptable if designed in accordance with the following guidelines:

Policy DLP30 – Shop Front Security

- a. It must be of a design that allows for the shop window display to remain clearly visible behind.
- b. The use of solid or perforated roller shutters for shopfronts would not be supported.
- c. Shutters must not extend beyond the span of the shop window and must be contained within an area defined by the fascia and pilasters of the shop front.
- d. Shutter box housings and guide channels should form an integral part of the shopfront design and be concealed behind the fascia or should be set back flush with the shopfront. Where visible they should be finished in a colour to match that of the shopfront.
- e. The installation of shutters should not result in the loss, removal or inappropriate alterations of an historic shopfront.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP30	+	0	0	0	0	0	0	0	0	0	0	0	+	0

- D.7.7.1 Policy DLP30 provides principles and guidance for shop front security. The policy aims to exhaust other security measures before the use of physical barriers and offers guidelines to be followed by applicants when installing external roller grilles or shutters.
- D.7.7.2 Through supporting the safe operation of businesses and appropriate use of security fixtures, the policy could potentially lead to a minor positive impact on the local economy (SA Objective 13).
- D.7.7.3 The policy states that “*within conservation areas, on listed and locally listed building, or where proposals affect the appearance or setting of a Heritage Asset, external roller grilles or shutters will not be permitted*”. In addition to this, the policy provides further guidelines to be adhered to if installing physical barriers that could impede upon historic shopfronts, stating that “*installation of shutters should not result in the loss, removal or inappropriate alterations of historic shopfront*”. Therefore, the policy could potentially have a minor positive impact on the cultural heritage of the local area in terms of conserving historic buildings and their settings (SA Objective 1).
- D.7.7.4 Policy DLP30 provides principles in relation to the positioning of security fixtures “*that should be positioned unobtrusively, having regard to the symmetry of the building*” and the design that should be “*of a visually appropriate design and colour*”. Therefore, the policy would help to reduce the potential for adverse effects on the character and appearance of the buildings, which would be expected to lead to an overall a negligible impact on the surrounding landscape (SA Objective 2).

D.8 Environment and Climate Change

D.8.1 Policy DLP31 – Nature Conservation

Policy DLP31 – Nature Conservation

- 1) Development within Dudley will safeguard nature conservation, inside and outside its boundaries, by ensuring that:
 - a. development will not be permitted where it would, alone or in combination with other plans or projects, have an adverse impact on the integrity of a European or internationally designated site, including Special Areas of Conservation (SAC);
 - b. development is not permitted where it would harm nationally (Sites of Special Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserves and Sites of Importance for Nature Conservation) designated nature conservation sites;
 - c. locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals that could negatively impact them;
 - d. the movement of wildlife within Dudley and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping-stone sites) is not impeded by development;
 - e. species that are legally protected, in decline, are rare within the Dudley and the sub-region or that are covered by national, regional, or local Biodiversity Action Plans will be protected when development occurs in accordance with Part I of the Wildlife and Countryside Act 1981.
- 2) Adequate information must be submitted with planning applications for proposals that may affect any designated site or important habitat, species, or geological feature, to ensure that the likely impacts of the proposal can be fully assessed. A Local Site Assessment must be undertaken and submitted to the Local Sites Partnership where development is likely to impact upon a Site of Importance for Nature Conservation. Supporting information must include a data search from the Local Records Centre⁵. Where the necessary information is not made available, there will be a presumption against granting permission.
- 3) Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.
- 4) Over the plan period, Dudley will update evidence on designated nature conservation sites and Local Nature Reserves as necessary in conjunction with the Local Sites Partnership and Natural England and will amend existing designations in accordance with this evidence. Consequently, sites may receive new, or increased, protection over the Plan period. The Local Environmental Records Centre hold, collate and disseminate the definitive and up-to-date register of locally designated nature conservation sites on behalf of the Dudley Council.
- 5) All appropriate development should positively contribute to the natural environment of Dudley by:
 - a. extending and improving the condition of nature conservation sites;
 - b. improving wildlife movement; and / or

⁵ Local Environmental Records Centre for Birmingham and the Black Country (EcoRecord).

Policy DLP31 – Nature Conservation

- c. restoring or creating habitats / geological features that actively contribute to the implementation of Nature Recovery Networks, Biodiversity Action Plans (BAPs) and / or Geodiversity Action Plans (GAPs) at a national, regional, or local level.
 - d. ensuring that canal and natural watercourse-side developments deliver improved and extended corridors for the movement of wildlife and people.
- 6) Details of how improvements (appropriate to their location and scale) will contribute to the natural environment, and their ongoing management for the benefit of biodiversity and geodiversity, will be expected to accompany planning applications. Proposals should be informed by Local Nature Recovery Strategies.
- 7) Additional guidance will be provided within SPDs where relevant.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP31	0	+	++	+	+	0	+	0	0	0	+	+	0	0

D.8.1.1 Policy DLP31 aims to protect, conserve and enhance biodiversity assets, from internationally designated to locally protected sites. The policy also aims to ensure protected or rare species are not harmed by future development, in addition to promoting ecological connectivity and nature recovery. The policy states that “*development within the Dudley will safeguard nature conservation, inside and outside its boundaries*”. In addition, the policy requires “*adequate information*” to be provided alongside planning applications which have the potential to adversely impact “*any designated site or any important habitat, species or geological feature*”. All future development should also “*positively contribute*” to the local natural environment and be informed by emerging Local Nature Recovery Strategies. Therefore, a major positive impact on biodiversity would be expected (SA Objective 3).

D.8.1.2 Biodiversity assets, such as Local Nature Reserves (LNRs) and Sites of Importance for Nature Conservation (SINCs), are often key features of local landscapes. By protecting, and potentially enhancing, biodiversity assets, it is likely that some key landscape features would also be protected and potentially enhanced, with benefits to local character and visual amenity. Therefore, this policy would be expected to have a minor positive impact on the local landscape (SA Objective 2).

D.8.1.3 Vegetation provides several ecosystem services to the Plan area, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation) and filtering air pollutants (pollution). The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance the provision of these essential ecosystem services. This policy could potentially result in minor positive impact on these three SA Objectives (SA Objectives 4, 5 and 7).

- D.8.1.4 The protection and enhancement of the natural environment would be likely to result in benefits to the health of local residents. Access to natural and diverse outdoor spaces is known to have benefits for mental wellbeing, whilst also encouraging physical activity and providing opportunities for community cohesion. This would therefore be expected to have a minor positive impact on equal access to nature, and to health and wellbeing (SA Objectives 11 and 12).

D.8.2 Policy DLP32 – Nature Recovery Network and Biodiversity Net Gain

Policy DLP32 – Nature Recovery Network and Biodiversity Net Gain

- 1) All development shall deliver the Local Nature Recovery Network Strategy in line with the following principles:
 - a. take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that zone;
 - b. follow the mitigation hierarchy of avoidance, mitigation and compensation, and provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure;
 - c. follow the principles of Making Space for Nature and recognise that spaces are needed for nature and that these should be of sufficient size and quality and must be appropriately connected to other areas of green infrastructure, to address the objectives of the Black Country Nature Recovery Network Strategy.
- 2) All development shall deliver a minimum 10% net gain in biodiversity value when measured against baseline site information.
- 3) Losses and gains as a result of proposed development will be calculated using the most current national Biodiversity Metric.
- 4) Development that is likely to have an impact on biodiversity will be considered in accordance with the mitigation hierarchy set out in the NPPF.
- 5) Biodiversity net gain shall be provided in line with the following principles:
 - a. a preference for on-site habitat provision / enhancement wherever practicable, followed by improvements to sites within the local area, and then other sites elsewhere within Dudley ;
 - b. the maintenance and where possible enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across Dudley and the Black Country;
 - c. the provision / enhancement of priority habitats identified at the national, regional, or local level, having regard to the scarcity of that habitat within Dudley and the Black Country;
- 6) Exemptions to the need to provide biodiversity net gain on all development will be as set out in the relevant legislation and national guidance.
- 7) Biodiversity net gain is not applied to irreplaceable habitats, such as ancient woodlands. Any mitigation and / or compensation requirements for sites identified and protected under European law or successor legislation should be dealt with as appropriate separately to biodiversity net gain provision.
- 8) Off-site compensation will be accepted as a fall-back only if compensating for losses is not possible within the development site boundary; where off-site measures are needed to meet biodiversity net gain requirements, it is expected that the off-site habitat enhancement or creation will be local to the development site.
- 9) Provision of on- or off-site compensation should not replace or adversely impact on existing alternative / valuable habitats in those locations and should be provided prior to development.

Policy DLP32 – Nature Recovery Network and Biodiversity Net Gain

- 10) Biodiversity net gain plans will need to be agreed prior to commencement⁶, subject to appropriate legal agreements and conservation covenants.
- 11) Sites and areas identified to provide for biodiversity net gain requirements should be managed and monitored for at least 30 years post-provision, via obligations or conservation covenants.
- 12) Monitoring plans will be required as part of the grant of planning permission and should include indicators⁷ to demonstrate the amount and type of biodiversity net gain provided through development, which should be as specific as possible to help build an evidence base for future reviews of the plan.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP32	0	+	++	+	+	0	+	0	0	0	+	+	0	0

- D.8.2.1 Policy DLP32 requires all development to deliver a minimum of 10% biodiversity net gain as part of development proposals, which will soon become mandatory for local planning authorities under the Environment Act 2021. The policy sets out guiding principles for biodiversity net gain in Dudley, reflecting the local and regional priorities, and seeks to ensure that developments consider the emerging Nature Recovery Network information. This would provide opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna, and as such, improve the biodiversity value of the Plan area. Therefore, this policy would be expected to have a major positive impact on biodiversity (SA Objective 3).
- D.8.2.2 Biodiversity net gain would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents’ exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7).
- D.8.2.3 Increased biodiversity and green cover would be expected to help reduce water runoff rates and as such, reduce the risk of both fluvial and surface water flooding. Improvements to the quality and quantity of the green network would also be likely to enhance natural water storage and flow functions. Connectivity between habitats, including stepping-stone habitats, is particularly important when considering global climatic trends as they provide opportunities for the movement of species and adaptation to climate change. Overall, a minor positive impact on water and flooding would be expected (SA Objective 5).

⁶ This can be after the grant of planning permission but must be before work starts on site

⁷ Examples of indicators include (but may not be restricted to) the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

- D.8.2.4 Enhanced biodiversity and green cover across Dudley would be likely to have positive impact on the local landscape, where opportunity to improve and protect the character would arise. Additionally enhanced green cover would be likely to positively impact residents' wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. A minor positive impact on local landscape and human health and wellbeing would therefore be expected (SA Objective 2 and 12). Biodiversity net gain provisions may also help to address accessibility gaps in terms of improving access to nature, with benefits to equality (SA Objective 11).

D.8.3 Policy DLP33 – Provision, retention and protection of trees, woodlands and Ancient Woodland, and Veteran trees

Policy DLP33 – Provision, retention and protection of trees, woodlands and Ancient Woodland, and Veteran trees

- 1) Development that would result in the loss of or damage to ancient woodland will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer, with a minimum depth of 15m⁸ and a preferred depth of 50m.
- 2) Development that would result in the loss of or damage to ancient or veteran trees will not be permitted. Veteran or ancient trees likely to be impacted by development should be protected, by the provision of a buffer around them of a minimum of 15 times the diameter of the tree (as measured in accordance with the appropriate standard). The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times its diameter⁹.
- 3) There will be a presumption against the removal of trees that contribute to public amenity and air quality management unless sound arboricultural reasons support their removal¹⁰. Where removal is unavoidable, replacement trees should be provided to compensate for their loss, on a site-by-site basis in conjunction with the LPA.
- 4) The planting of new, species diverse, trees and woodlands will be sought, in appropriate locations¹¹, to increase the extent of tree canopy cover in Dudley to a minimum of 20%.

Habitat Creation

- 5) All available data on extant tree canopy cover and associated habitat¹² will be considered when making decisions on the proposed loss of trees and woodland to accommodate infrastructure and other development proposals. All major developments must deliver a minimum of 20% canopy cover, with the emphasis on retaining existing established trees.
- 6) In areas where evidence demonstrates that current levels of tree canopy cover are low, proposals that incorporate additional tree planting, to increase existing levels of habitat and urban tree canopy cover to above the required minimum of 20% will be considered positively, as part of the wider contribution to

⁸ Natural England and Forestry Commission guidance, January 2022

⁹ Natural England and Forestry Commission guidance, January 2022

¹⁰ The tree is a clearly identified and immediate threat to human safety; disease is significantly impacting the tree's longevity and safety; the tree is causing clearly evidenced structural damage to property where remedial works cannot be undertaken to alleviate the problem; the tree is creating a clearly identified danger or causing significant damage to the adopted highway / footpath network.

¹¹ See also DLP29 part 9 and DLP30 part 17 – subject to the suitability of existing habitats to be used for tree planting

¹² E.g. from the local ecological records centre

Policy DLP33 – Provision, retention and protection of trees, woodlands and Ancient Woodland, and Veteran trees

biodiversity net gain, where such planting would not adversely affect areas with recognised ecological or biodiversity value that would be damaged or destroyed by tree planting¹³.

- 7) Tree species identified as being resilient to predicted climate change and pests and diseases are to be favoured in landscaping schemes or as replacement planting, to maximise habitats for local wildlife/species and maintain and increase biodiversity. This should be achieved through a mix of native and non-native species to maintain a healthy and diverse tree population.
- 8) Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting areas of ancient woodland, will be maximised, in particular by means of the biodiversity net gain and Nature Recovery Network initiatives (see Policy DLP32).

Trees and development

- 9) Development must be designed around the need to incorporate trees already present on site, using sensitive and well-designed site layouts to maximise their retention. No design work, however conceptual, should start until the tree constraints associated with a development site are well understood.
- 10) An arboricultural survey, carried out to an appropriate standard BS5837:2012 (BS5837:2012 - Trees in relation to Design, Demolition and Construction, BSI: London) should be undertaken prior to removal of any vegetation or site groundworks and used to inform a proposal's layout at the beginning of the detailed design process.
- 11) Existing mature trees¹⁴, trees that are ecologically important, and ancient/veteran trees, must be retained and integrated into the proposed landscaping scheme, recognising the important contribution of trees to the character and amenity¹⁵ of a development site and to local green infrastructure networks.
- 12) In addition to meeting the requirements for replacement trees on sites and biodiversity net gain, new tree planting should be included in all new residential developments and other significant proposals¹⁶, as street trees or as part of landscaping schemes with suitable planting specifications for trees in hard landscapes.
- 13) Development proposals should use large-canopied species where possible, which provide a wider range of health, biodiversity and climate change mitigation and adaptation benefits because of their larger surface area as well as making a positive contribution to increasing overall tree canopy cover¹⁷
- 14) Consideration must be given to the suitability of planting positions in proximity to adjacent constructions, such as walls and buildings, to avoid the risk of structural damage occurring as trees grow and mature.
- 15) Ensure both existing and new trees have a suitable growing environment with adequate space allowed to reach their mature height and spread without causing nuisance to built structures and their occupants.
- 16) To enable trees to reach their optimum size, a sufficient soil volume must be available to the root system. The soil type, including drainage, must be such that tree roots are able to grow and function adequately.

¹³ See also Local Nature Recovery Network Strategy

¹⁴ Health and status as assessed in a report produced by an accredited arboriculturist

¹⁵ National planning guidance identifies trees worthy of retention on amenity grounds (through use of a TPO) as those that are visible in part or whole from a public place and / or those with individual, collective and wider impact (in terms of size, form, future potential, rarity, cultural / historic value, landscape contribution and / or contribution to a conservation area). Other factors such as value for nature conservation and climate change may also be considered.

¹⁶ E.g. new infrastructure, non-residential development, town centre regeneration and other similar schemes

¹⁷ The area of ground covered by trees when seen from above.

Policy DLP33 – Provision, retention and protection of trees, woodlands and Ancient Woodland, and Veteran trees

- 17) Plan and sufficiently resource post planting care for three to five years as detailed in BS8545:2014. (British Standard 8545:2014 Trees: from nursery to independence in the landscape – Recommendations. BSI: London).
- 18) Details of instructions for householders regarding their planning liability and maintenance of trees planted in private gardens for major developments must also be provided.
- 19) To show new tree planting has been undertaken in accordance with the approved details and plans; the applicant must submit to the Council a verification document from the landscape consultant confirming the works are completed as approved. This shall include confirmation of tree pits, ground preparation and photographs of the trees after planting. Without such proof of planting, the developer will have a continued obligation to plant or replace any trees in the approved plans.
- 20) All planting proposals must demonstrate that they:
 - a. have been designed to use suitable species.
 - b. take account of the need for biosecurity, including control of non-native invasive species; and
 - c. ensure all planting stock is supplied free of pests or pathogens
- 21) All new major developments must make a minimum contribution of 20% tree canopy cover across the development site (estimated growth 25-years from planting)¹⁸ To be monitored annually using Bluesky's National Tree Map and GIS Data.
- 22) New houses and other buildings must be carefully designed and located to prevent an incompatible degree of shade¹⁹ being cast by both existing and new trees that might result in future pressure for them to be removed.
- 23) The positioning of trees in relation to streets and buildings should not worsen air quality for people using and living in them. Care should be taken to position trees and / or design streets and buildings in a way that allows for street-level ventilation to occur, to avoid trapping pollution between ground level and tree canopies (see Policy DLP44)
- 24) Where planning permission has been granted that involves the removal of trees, agreed replacement trees of a suitable species must be provided onsite. Where sufficient and suitable onsite replacements cannot be provided, off-site planting or woodland enhancement, including support for natural regeneration, in the near vicinity of the removed tree(s) must be provided, in line with the mitigation hierarchy set out in Policy DLP31. Appropriate planning conditions will be used to secure timely and adequate alternative provision and ongoing maintenance.
- 25) Replacement trees located off-site should not be planted where they would impact on areas designated as ecologically important unless this has been specifically agreed with the relevant authority and its ecological officers / advisers.
- 26) Trees proposed for removal during development must be replaced commensurate with the size, stature, rarity, and public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacement must also be in the form of a group commensurate with the area covered, size and species of trees and established quality of the original

¹⁸ England's Urban Forests; Using tree canopy cover to secure the benefits of the urban forest – Urban Forest and Woodland Advisory Committee Network

¹⁹ This will be in the context of the requirements outlined in policies elsewhere in this plan on the role of trees in mitigating climate change and providing appropriate levels of shade and cooling.

Policy DLP33 – Provision, retention and protection of trees, woodlands and Ancient Woodland, and Veteran trees

group and, where possible, located in a position that will mitigate the loss of visual amenity associated with the original group²⁰.

- 27) Where proposed development will impact on the protection, safety and / or retention of a number of trees, or on the character and appearance of trees of importance to the environment and landscape, the use of an Arboricultural Clerk of Works²¹ will be required, to be made subject to a condition on the relevant planning permission.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP33	+	+	++	+	+	+	+	0	0	0	0	+	0	0

D.8.3.1 Policy DLP33 aims to create, retain and protect trees and woodlands, including ancient trees, ancient woodlands and veteran trees across the Plan area. Where the loss of a tree is unavoidable, this policy requires the replacement tree to be *"commensurate with the size, stature, rarity, and public amenity of the tree(s) to be removed"*. This policy requires an arboricultural survey to be carried out prior to removal of any vegetation or site groundworks. The policy identifies the importance of ecologically valuable and veteran / ancient trees, including TPOs and states that these *"must be retained and integrated into the proposed landscaping scheme"*. Policy DLP33 also encourages habitat creation and biodiversity net gain and sets out the requirement to increase canopy cover in Dudley to a minimum of 20%. Trees and woodlands support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, this policy could potentially have a major positive impact on biodiversity (SA Objective 3).

D.8.3.2 The retention and enhancement of trees and woodland supported under this policy would be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This could also potentially help to reduce residents' exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives would therefore be expected (SA Objectives 4 and 7). This could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats is also

²⁰ I.e., as close as possible to the site of the removed trees.

²¹ The Arboricultural Clerk of Works is a suitably qualified arboriculturist acting on behalf of the developer. They will be engaged to monitor and oversee the implementation of the works required within the protection area of a retained tree / trees.

expected to benefit mental wellbeing. Therefore, a minor positive impact would also be expected in terms of human health (SA Objective 12).

D.8.3.3 Trees serve an important role in protecting soil from erosion, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy would therefore be likely to help preserve soils and have a minor positive impact on natural resources (SA Objective 6). By reducing water runoff rates this would also be expected to enhance natural water storage and help to reduce the risk of fluvial and surface water flooding. A minor positive impact would be expected in terms of reducing flood risk (SA Objective 5).

D.8.3.4 Furthermore, trees and woodlands can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest. Additionally, the protection of ancient and veteran trees and woodland would be expected to help protect and enhance historic character. Therefore, this policy could potentially result in minor positive impact to cultural heritage and the local landscape (SA Objectives 1 and 2).

D.8.4 Policy DLP34 – Provision, retention, and protection of Hedgerows

Policy DLP34 – Provision, retention, and protection of Hedgerows

- 1) Under The Hedgerows Regulation 1997 protection is afforded to hedgerows of more than 20 metres in length or which join other hedgerows, provided they adjoin agricultural land, forestry, paddocks, common land, village greens, a site of special scientific interest or a local nature reserve.
- 2) There will be a presumption against the wholesale removal of hedgerows for development purposes, especially where ecological surveys have identified them to be species-rich and where they exist on previously undeveloped land.
- 3) Hedgerow retention and reinforcement will be of particular importance where hedgerows form part of an established ecological network enabling the passage of flora and fauna into and out of rural, peri-urban, and urban areas. If hedgerow removal is needed to accommodate a high-quality site layout, replacement hedgerow planting will be required.
- 4) Protection of hedgerows before and during development must be undertaken. This will include: the provision of landscape buffers where appropriate; protective fencing and temporary ground protection during the construction phase; and careful management of plant and materials on site to avoid damage to the hedgerow(s) and its root system.
- 5) New hedgerows will be sought as part of site layouts and landscaping schemes where appropriate and must include a suitable mixture of species that are able to withstand climate change and promote local biodiversity.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLP34	0	+	+	0	0	0	0	0	0	0	0	+	0	0

D.8.4.1 Policy DLP34 aims to create, retain and protect hedgerows “*before and during development*”. The policy states that ecological surveys will also be required to identify the ecological importance of hedgerows. This would be expected to help prevent the inappropriate loss of vegetation. Hedgerows support a vast array of important flora and fauna and would be expected to facilitate the movement of species through connecting habitats. The policy would therefore be expected to have a minor positive impact on biodiversity (SA Objective 3).

D.8.4.2 Hedgerows can contribute to the local landscape, for example, in terms of protecting or enhancing views, or providing visual interest. Access to a variety of natural habitats and enhanced green cover is also expected to benefit mental wellbeing. The policy would therefore be likely to have a minor positive impact on the local landscape and health and wellbeing of residents (SA Objectives 2 and 12).

D.8.5 Policy DLP35 – Geodiversity and the Black Country UNESCO Global Geopark

Policy DLP35 – Geodiversity and the Black Country UNESCO Global Geopark

1) Development proposals should:

- a. wherever possible, make a positive contribution to the protection and enhancement of geodiversity, particularly within the boundaries of the Black Country UNESCO Global Geopark and in relation to the geosites identified within it.
- b. be resisted where they would have significant adverse impact on the Geopark geosites or other sites with existing or proposed European or national designations in accordance with Government guidance.
- c. give locally significant geological sites²² a level of protection commensurate with their importance.
- d. take into account, and avoid any disruption to, the importance of the inter-connectivity of greenspace and public access between geosites within the boundary of the Black Country UNESCO Global Geopark.

2) Dudley will through the relevant mechanisms:

- a. Establish clear goals for the identification of areas of anticipated exceptional geological heritage, for the management of known, identified sites (both individually and as part of a network) to promote access to, appreciation and interpretation of geodiversity.
- b. Ensure geological sites of international, national or regional importance are clearly identified.

3) Proposals affecting geological features should also refer to policy DLP52 The Borough’s Geology.

1	2	3	4	5	6	7	8	9	10	11	12	13	14
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²² Many of which are identified as Sites of Local Importance for Nature Conservation (SLINCs) or Sites of Importance for Nature Conservation (SINCs) – see policy DLP28, and / or lie within areas of significant historic value, such as conservation areas, registered parks and gardens or other parts of the Black Country’s historic landscape – see Policy DLP31 - Historic Character and Local Distinctiveness.

Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP35	+	+	+	0	0	0	0	0	0	0	0	0	+	+

D.8.5.1 Policy DLP35 would be expected to help protect and enhance geodiversity sites across Dudley, including those which form part of the Black Country UNESCO Global Geopark. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. This policy would be likely to have a minor positive impact on local geodiversity (SA Objective 3). Sites of geological importance are often strongly linked to the surrounding local landscape and historic features. By protecting the local geodiversity, this policy would also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

D.8.5.2 The protection and enhancement of geologically important sites including the UNESCO Global Geopark would be likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark²³. Policy DLP35 states that Dudley Council should “*establish clear goals for the management of areas of anticipated exceptional geological heritage ... to promote access to, appreciation and interpretation of geodiversity*” which could potentially have a minor positive impact on education (SA Objective 14).

D.8.6 Policy DLP36 – Canals

Policy DLP36 – Canals
<p>1) The Dudley canal network comprises the canals and their surrounding landscape corridors, designated and non-designated heritage assets, character, settings, views and interrelationships. The canal network provides a focus for future development through its ability to deliver a high-quality environment and enhanced accessibility for boaters, pedestrians, cyclists, and other non-car-based modes of transport.</p> <p>2) All development proposals likely to affect the canal network must:</p> <ol style="list-style-type: none"> demonstrate that they will not adversely affect the structural integrity of canal infrastructure²⁴ to avoid increased flood risk, land instability and/or harm to the usability of the canal (including its towpath) as a green-blue infrastructure asset; ensure that any proposals for reinstatement or reuse would not adversely impact on locations of significant environmental value where canals are not currently navigable; protect and enhance its special historic, architectural, archaeological, and cultural significance and their setting, including the potential to record, preserve and restore such features;

²³ Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date Accessed: 20/07/23]

²⁴ Canal infrastructure includes (but is not limited to) waterway walls, embankments, cuttings, locks, culverts, weirs, aqueducts, tunnels and bridges

Policy DLP36 – Canals

- d. protect and enhance its nature conservation value including habitat creation and restoration along the waterway and its surrounding environs;
 - e. protect and enhance its visual amenity, key views and setting;
 - f. protect and enhance water quality in the canal and protect water resource availability both in the canal and the wider environment.
 - g. reinstate and / or upgrade towpaths and link them into high quality, wider, integrated pedestrian and cycle networks, particularly where they can provide links to transport hubs, centres and opportunities for employment.
- 3) Where opportunities exist, all development proposals within the canal network must:
- a. enhance and promote its role in providing opportunities for leisure, recreation and tourism activities;
 - b. enhance and promote opportunities for off-road walking, cycling, and boating access, including for small-scale commercial freight activities;
 - c. protect and enhance the historical, geological, and ecological value of the canal network and its associated infrastructure;
 - d. positively relate to the opportunity presented by the waterway by promoting high quality design, including providing active frontages onto the canal and by improving the public realm;
 - e. sensitively integrate with the canal and any associated canal-side features and, where the opportunities to do so arises, incorporate canal features into the development.
- 4) Development proposals must be fully supported by evidence that the above factors have been fully considered and properly incorporated into their design and layout.
- 5) Where proposed development overlays part of the extensive network of disused canal features, the potential to record, preserve and restore such features must be fully explored unless canals have been entirely removed. Development on sites that include sections of disused canals should protect the line of the canal through the detailed layout of the proposal. Development will not be permitted that would sever the route of a disused canal or prevent the restoration of a canal link where there is a realistic possibility of restoration, wholly or in part.
- 6) Safeguard the amenity of existing residential moorings when planning consent is sought on sites in close proximity or adjacent to existing moorings.

Residential Canal Moorings

- 7) For residential moorings, planning consent will only be granted for proposals that include the provision of:
- a. the necessary boating facilities;
 - b. appropriate access to cycling and walking routes;
 - c. an adequate level of amenity for boaters, not unduly impacted upon by reason of noise, fumes or other nearby polluting activities.
- 8) In determining a planning application for residential moorings, account will be taken of the effect that such moorings and their associated activities may have on the amenities or activities of nearby residential or other uses.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP36	+	+	+	0	0	0	+	0	+	+	0	+	+	0

- D.8.6.1 Policy DLP36 aims to protect and enhance the borough’s canal network. The policy requires development proposals to seek to reinstate and/or upgrade towpaths and link them into high-quality, wider pedestrian and cycle networks. This would be expected to ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9). Furthermore, enhancing the canal towpath network for use by pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).
- D.8.6.2 Policy DLP36 requires development proposals to protect and enhance the canals “*special historic, architectural, archaeological and cultural significance*”, “*nature conservation value including habitat creation and restoration*”, “*visual amenity, key views and setting*” and “*water quality*”. These requirements would be likely to result in minor positive impacts in relation to cultural heritage, landscape, biodiversity and pollution (SA Objectives 1, 2, 3 and 7).
- D.8.6.3 The policy states that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities. This would be likely to have a minor positive impact on the local economy (SA Objective 13).
- D.8.6.4 This policy would support the development of residential moorings within the borough. This policy could potentially have a minor positive impact on accommodation provision (SA Objective 10).
- D.8.6.5 Policy DLP36 would benefit from stronger wording surrounding the ecological value of the canal network, including the consideration of the ecological status of waterbodies.

D.8.7 Policy DLP37 – Open Space and Recreation

Policy DLP37 – Open Space and Recreation

- 1) All development proposals should recognise the values and functions of open space as set out in national policy and guidance and address as appropriate the following functions of open space that are of particular importance in Dudley:
 - a. Improving the image and environmental quality of Dudley;
 - b. defining and enhancing local distinctiveness;
 - c. protecting and enhancing the significance of heritage assets and their setting, including those of value for their industrial, geological, canal, archaeological and architectural heritage;
 - d. enhancing visual amenity;

Policy DLP37 – Open Space and Recreation

- e. providing buffer zones between incompatible uses;
 - f. mitigating the effects of climate change in accordance with relevant policies, through flood risk betterment, reducing potential urban heat island effects and providing opportunities for additional landscaping and tree planting;
 - g. preserving and enhancing diversity in the natural and built environment and preventing the fragmentation of habitat networks;
 - h. strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network;
 - i. providing outdoor sport and physical activity facilities, including footpath and cycle networks and areas for informal recreation and children’s play;
 - j. providing opportunities for people to grow their own food on allotments and encouraging urban horticulture;
 - k. enhancing people’s mental and physical health and well-being.
- 2) Development that would reduce the overall value of the open space and recreation network will be resisted. Development that would increase the overall value of the open space and recreation network will be supported, especially in areas of proven deficiency against adopted quantity, quality and accessibility standards.
- 3) The Policies Map will show proposals for specific open space and recreation. Dudley will:
- a. move towards up-to-date local open space and recreation standards for in terms of quantity, quality and access. In order to balance the realisation of these standards, in some cases a loss in quantity of open space or facilities may be acceptable if compensatory gains in quality and / or accessibility of other open spaces / facilities can be secured that would be of a greater value in the local area;
 - b. address the priorities set out in the Black Country Nature Recovery Network Strategy;
 - c. make more efficient use of urban land by:
 - i. creating more multifunctional open spaces;
 - ii. protecting the existing green network for recreation and biodiversity and taking opportunities to strengthen and expand the network;
 - iii. significantly expanding community use of open space and recreation facilities provided at places of education (see Policy DLP16);
 - iv. providing opportunities to increase accessible public open space and recreation use of the Green Belt;
 - v. making creative use of land exchanges and disposing of surplus assets to generate resources for investment;
 - vi. increasing access to open space and recreation facilities for all, including people with disabilities and other target groups with limited access at present; and
 - vii. where there is a cross-boundary impact, identifying the most appropriate location to maximise community access and use of new facilities.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP37	+	+	+	+	+	0	+	0	+	0	+	+	0	0

- D.8.7.1 Policy DLP37 seeks to ensure that open space and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents. The provision of open space would be likely to lead to multiple benefits within an area, including physical and mental health benefits associated with residents’ access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation.
- D.8.7.2 Access to recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy would be expected to support the development of recreation and leisure facilities within the Plan area. This could potentially help to meet the identified need for additional leisure centres in some areas of the borough. This policy would be expected to improve current facilities, contribute to the development of new facilities and ensure residents have good access to outdoor space. Therefore, this policy would be expected to have a major positive impact on the health and wellbeing of residents (SA Objective 12). This policy also encourages the development of footpath and cycle networks, with benefits to local accessibility (SA Objective 9).
- D.8.7.3 Furthermore, through “*increasing access to open space and recreation facilities for all, including people with disabilities and other target groups with limited access at present*” this policy would be expected to help fill gaps in accessibility for vulnerable or disadvantaged groups, providing more equitable access to these important facilities. Therefore, a minor positive impact on equality would be expected (SA Objective 11).
- D.8.7.4 Open space can be beneficial to the local biodiversity network by providing an increased number of natural habitats and the opportunity to create green links within urban areas; Policy DLP37 states that DMBC will seek to “*address the priorities set out in the Black Country Nature Recovery Network Strategy*”. Increased green links could also benefit the local landscape by creating attractive open spaces within the area. This policy aims to improve visual amenity and contribute towards the preservation and enhancement of archaeological heritage and diversity in the natural and built environment. As a result, it would be expected that Policy DLP37 would have a minor positive impact on local cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).
- D.8.7.5 Potential new or enhanced open spaces, and associated green infrastructure, would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy could potentially contribute towards the mitigation anthropogenic climate change. Green infrastructure could also potentially provide natural filtration to reduce residents’ exposure to air pollution, for example from emissions associated with road transport. Furthermore, this policy encourages active travel, which would be expected to reduce the reliance on private car use. A minor positive impact on the climate change and pollution would therefore be

expected (SA Objectives 4 and 7). Enhanced open space and green infrastructure could also potentially help to reduce water runoff rates, and as such, have a minor positive impact by reducing the risk of flooding (SA Objective 5).

D.8.8 Policy DLP38 – Playing Fields and Sports Facilities

Policy DLP38 – Playing Fields and Sports Facilities

- 1) Existing playing fields and built sports facilities should be retained unless:
 - a. an assessment has been undertaken that has clearly shown the playing fields or built sports facilities to be surplus to requirements (for the existing or alternative sports provision) at the local and sub-regional level; or
 - b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c. the development is for alternative sports provision, the benefits of which clearly outweigh the loss of the current or former use; or
 - d. The proposed development affects only land incapable of forming part of a playing pitch and would not prejudice the use of any playing pitch or remaining areas of playing field on the site.
- 2) New built sports facilities (including stadiums) should be:
 - a. demonstrated to accord with identified needs to ensure provision of appropriate facilities in a suitable location to meet that need;
 - b. well-designed, including through the provision of high-quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities; and
 - c. well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside centres must be justified in terms of relevant national policy.
- 3) Where assessments demonstrate that a housing development would increase the need for playing pitches or built sports facilities to a level where significant new or improved facilities are required to meet demand, proportionate planning obligations or Community Infrastructure Levy will be used to acquire sufficient provision, where it is financially viable and appropriate to do so, and long-term management arrangements can be secured and funded.
- 4) Where land is provided for a new built sports facility as part of a housing development, the financial contribution made by that development towards built sports facilities will be reduced accordingly.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP38	0	+	0	0	0	0	0	0	+	0	+	+	0	0

D.8.8.1 Policy DLP38 seeks to ensure that playing fields and sports facilities throughout the Plan area will be protected, managed and enhanced. New facilities are required under the policy to be well-designed through *"high-quality landscaping and public realm*

enhancements” that meet the needs of the area. Playing field and sport facility enhancements could therefore be expected to positively contribute to the local character and would therefore have a minor positive impact on the local landscape (SA Objective 2).

- D.8.8.2 Sports facilities and playing fields are to be *“well-linked to public transport infrastructure and footpath and cycleway networks”*. The policy would encourage active lifestyles through promoting active modes of transport and the provision of facilities that allow for sporting activities. The policy would therefore be expected to have a minor positive impact on transport and accessibility and health and wellbeing of residents (SA Objectives 9 and 12). The retention and provision of sports and leisure facilities in line with locally identified needs would also be likely to result in a minor positive impact on equality, in terms of equal access to sports (SA Objective 11).

D.8.9 Policy DLP39 – Design Quality

Policy DLP39 – Design Quality

- 1) Development proposals must demonstrate that the following aspects have been addressed, through design and access statements that reflect their local context:
 - a. implementation of the principles of “By Design” to ensure the provision of a high quality network of streets, buildings and spaces;
 - b. implementation of the principles of “Manual for Streets²⁵” to ensure urban streets and spaces are designed to provide a high quality public realm and an attractive, safe and permeable movement network;
 - c. use of the Building for a Healthy Life²⁶ criteria (or subsequent iterations) and the Residential Design Guide SPD for new housing developments, to demonstrate a commitment to achieve the highest possible design standards, good place-making and sustainable development;
 - d. consideration of crime prevention measures and Secured by Design and Park Mark principles, in addition to the requirements of Part Q of the Building Regulations 2010 or any successor legislation;
 - e. accordance with the agent of change²⁷ principle in relation to existing uses adjacent to proposed development sites.
- 2) Development will be designed to the highest possible standards, creating a strong sense of place. Development proposals must address as appropriate:
 - a. the townscapes and landscapes of Dudley;
 - b. the need to maintain strategic gaps and views;
 - c. the built and natural settings of development and the treatment of ‘gateways’;
 - d. Dudley’s industrial and vernacular architecture and links with the wider rural hinterland;

²⁵ To be supplemented by Manual for Streets 2 in 2022 - <https://www.ciht.org.uk/knowledge-resource-centre/resources/revising-manual-for-streets/>

²⁶ <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

²⁷ Paragraph 187 of the NPPF (2021) states that both planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (e.g. places of worship, pubs, music venues and sports clubs). Unreasonable restrictions should not be placed on existing businesses because of development permitted after they were established.

Policy DLP39 – Design Quality

- e. the need to ensure development has no harmful impacts on key environmental and historic assets (see Policies DLP 31, 32 and 55)
 - f. where necessary, the issue of land instability in relation to specific development proposals.
- 3) New residential development (including conversions from non-residential properties) and houses in multiple occupation will be required to meet water efficiency standards²⁸ of 110 litres per person per day, as set out in Part G2 of current Building Regulations 2010 or any successor legislation.
- 4) All new residential development (including the conversion of buildings) and the creation of houses in multiple occupation will be required to meet the Nationally Described Space Standards (NDSS)²⁹, except where it can be clearly evidenced that the implementation of the NDSS would cause harm to the significance of a heritage asset. The space standards will apply to all tenures.
- 5) Major development proposals should contribute to the greening of Dudley by:
- a. including urban greening³⁰ as a fundamental element of site and building design;
 - b. incorporating measures such as high-quality landscaping (including trees), other soft landscaping and planting, green roofs, green walls and sustainable drainage and conserving existing green spaces and natural resources;
 - c. optimising the use of multi-functional green infrastructure (including water features, green roofs and planting) for urban cooling, local flood risk management and to provide access to outdoor space and shading.
- 6) Development should reflect National Design Guide principle H1³¹ in delivering functional, healthy and sustainable homes and buildings, particularly in relation to creating healthy, comfortable and safe internal and external environments.
- 7) New developments should functionally integrate with existing urban areas, green infrastructure, and surrounding countryside.
- 8) Development must not cause a detrimental impact on the living environment of occupiers of existing residential properties, or unacceptable living conditions for future occupiers of new residential properties, in terms of:
- a. privacy and overlooking
 - b. access to sunlight and daylight;
 - c. artificial lighting;
 - d. vibration;
 - e. dust and fumes;
 - f. smell;
 - g. noise;
 - h. excess heat or cold
 - i. crime and safety; and / or

²⁸ <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-gov>

²⁹ <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

³⁰ e.g. landscaping, provision of formal / informal open space, habitat creation and improvement, tree planting, certain forms of infrastructure such as types of SuDS etc. in urban locations

³¹ Or any succeeding guidance or legislation on design standards.

Policy DLP39 – Design Quality

j. wind, where the proposals involve new development of more than eight storeys.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP39	+	+	+	+	+	+	+	0	+	0	+	+	0	0

D.8.9.1 Design codes can help to ensure new developments are integrated effectively into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work. Policy DLP39 aims to implement good design throughout the borough.

D.8.9.2 The National Design Guide³² sets out the characteristics of well-designed places and aims to demonstrate good design. The Manual for Streets³³ guidance sets out how to effectively design, construct, adopt and maintain new and existing residential streets. Building for Life 12³⁴ is a government endorsed design quality indicator for well-designed developments. This policy also refers to the Building Regulations³⁵, which contains general guidance on the performance of building work expected, and practical solutions on how to achieve compliance. These guides should be used by local authorities to help guide design codes within the Plan area.

D.8.9.3 The Nationally Described Space Standards³⁶ help to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still provide residents with enough internal space. It is thought that the greater the internal space within a property, the better the standard of living for residents.

D.8.9.4 This policy sets out criteria to help ensure future development proposals do not result in *"harmful impacts on key environmental and historic assets"* and that the townscapes of

³² Ministry of Housing, Communities and Local Government (2019) National Design Guide: Planning practice guidance for beautiful, enduring and successful places. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date Accessed: 20/07/23]

³³ Department for Transport (2007) Manual for Streets. Available at: <https://www.gov.uk/government/publications/manual-for-streets> [Date Accessed: 21/07/23]

³⁴ D. Birkbeck and S. Kruczowski (2015) Building for Life 12. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition> [Date Accessed: 21/07/23]

³⁵ Ministry of Housing, Communities and Local Government (2016) Building Regulations: Approved Documents. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 21/07/23]

³⁶ Ministry of Housing, Communities and Local Government (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date Accessed: 21/07/23]

- the borough are protected. High-quality design would help to ensure that new development does not have an adverse impact on any surrounding heritage assets, and could potentially provide opportunities for enhancement or heritage-led regeneration. Therefore, a minor positive impact on the historic environment would be expected (SA Objective 1).
- D.8.9.5 The policy requires development proposals to create a “*strong sense of place*”, “*maintain strategic gaps and views*” and include high-quality landscaping. This would be likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely affect the existing landscape character and where appropriate, enhances visual amenity and sense of place in the area (SA Objective 2).
- D.8.9.6 This policy states the importance of greening throughout the borough. This provision of green infrastructure would be likely to deliver additional habitats for wildlife within the urban environment and present opportunities to better connect biodiversity features. This policy would therefore be likely to have a minor positive impact on biodiversity (SA Objective 3). Green infrastructure can also have benefits such as enhancing natural water storage and flow functions. In addition, this policy promotes the use of flood management, including SuDS, which would be expected to have a beneficial impact on local surface water flooding issues. This would be likely to have a minor positive impact on climate change adaptation (SA Objective 5).
- D.8.9.7 This policy would be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design. Therefore, a minor positive impact on climate change mitigation would be expected (SA Objective 4).
- D.8.9.8 Under Policy DLP39, future development must meet the higher water efficiency requirements as stated in the Building Regulations. The efficient use of water and energy would be expected to have a minor positive impact on natural resources (SA Objective 6).
- D.8.9.9 The policy states that future development must not result in detrimental impact on the living environment in regard to artificial lighting, vibrations, dust, fumes, smell and noise. Urban greening encouraged within this policy would also be expected to help to buffer developments against these pollutants. This would be likely to have a minor positive impact in relation to pollution (SA Objective 7).
- D.8.9.10 Policy DLP39 seeks to ensure that development proposals follow the ‘Manual for Streets’ to provide an attractive, safe and permeable movement network. This would be likely to have benefits for local accessibility and have a minor positive impact in relation to transport (SA Objective 9).
- D.8.9.11 This policy would be likely to make a positive contribution to reducing crime and fear of crime in the local area, including through requiring consideration of ‘Secured By Design’ principles. This would be expected to create safe and cohesive communities and help to improve quality of life for residents. As such, this policy would be likely to have a minor positive impact on equality (SA Objective 11).
- D.8.9.12 An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. Residents with more space, and therefore

better qualities of life, are likely to be part of a more vibrant and interactive community, and as such, a minor positive impact on the wellbeing of residents would be expected (SA Objective 12).

D.8.10 Policy DLP40 – Landscape Design

Policy DLP40 – Landscape Design

- 1) Within new development sites, areas that are not needed for pedestrian or vehicular use should be retained for soft landscaping and protected during the construction process. Hard surfaces should not be used unless there is an overriding need. New development proposals will be required to include a mix of native and non-native tree and shrub species in on-site landscaping schemes in keeping with the local character and in accordance with the most up to date and relevant SPDs for the following reasons; to strengthen and provide beneficial wildlife habitat and/or geological outcrop.
 - a. to enhance the appearance and landscape setting of the development scheme and help blend the development scheme into the surroundings
 - b. to introduce climate change benefits including promoting urban cooling, reducing air borne pollution, providing shade cover, and reducing flood risk by reducing surface water run-off
 - c. to promote locally distinctive development
 - d. to assist with delivering positive outcomes for physical and mental health.
- 2) Wherever possible, locally grown plant stock and use of local seed banks should be used as it is better suited to local conditions and is attractive to local wildlife.
- 3) Preserving or creating new green space landscape linkages from a development site into the surrounding green network should be a priority in order to strengthen, repair and restore such corridors.
- 4) Design and Access Statements submitted to accompany planning applications and applications for listed building consent should include:-
 - a. a full site analysis of existing landscape features and designations
 - b. an accurate site survey including landscape features and site levels
 - c. the relationship of the site to its surroundings
- 5) Development shall not lead to the spread of non-native invasive species as identified by the latest legislation. Where species are identified on site, planning proposals will provide measures to ensure that they are eradicated in an effective manner, which is sensitive to the local environment.
- 6) In addition, it should be demonstrated that the future management of the site will prevent the successful re-establishment of these species from off-site sources.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP40	0	++	++	0	++	0	0	0	0	0	0	+	0	0

D.8.10.1 DLP40 sets out the requirements for development proposals in relation to the landscape design and the considerations that should be made to ensure that new development is in keeping with the surrounding landscape. The policy states that new development will be

"required to include a mix of native and non-native tree and shrub species in on-site landscaping schemes" with the aim to *"enhance the appearance and landscape setting of the development scheme"*. Alongside landscape benefits, the inclusion of native trees and shrub would *"strengthen and provide beneficial wildlife habitat"*, which would be expected to increase habitat connectivity, enhance biodiversity assets and provide opportunities for BNG. Overall, the policy would be expected to have a major positive impact on landscape and biodiversity (SA Objective 2 and 3).

- D.8.10.2 The policy includes measures to increase the GI cover within the borough and provide green linkages that would aim to *"strengthen, repair and restore such corridors"*. Furthermore, the policy aims to *"introduce climate change benefits including promoting urban cooling, reducing air borne pollution, providing shade cover, and reducing flood risk by reducing surface water run-off"*. These measures would ensure development is adaptive to climate change and by providing increased GI cover this would strengthen ecosystem services. The policy would therefore be expected to have a major positive impact on climate change adaptation (SA Objective 5).
- D.8.10.3 The proposed increased green cover would be likely to positively contribute to the mental wellbeing of residents. The policy states that the addition of green cover would *"assist with delivering positive outcomes for physical and mental health"*. Therefore, the policy would be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

D.9 Climate Change

D.9.1 Policy DLP41 – Increasing Efficiency and Resilience

Policy DLP41 - Increasing Efficiency and Resilience

- 1) Development should be designed to mitigate climate change impacts and provide adaptations that will help communities and individuals to continue to avoid or mitigate adverse effects on human health. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements: -
 - a. wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements.
 - b. development proposals that include and / or impact on transport infrastructure and / or which generate a significant number of person trips will need to meet the needs of all sections of the community by including a range of sustainable and low carbon transport modes as alternatives to private car use (see Policy DLP72).
 - c. use of trees and other planting in landscaping schemes will be required throughout Dudley, to provide for the shading of amenity areas, buildings and streets, mitigate against poor air quality and help connect fragmented habitats and protect and support biodiversity networks.
 - d. landscaping schemes should be designed using a mix of tree species and plants where appropriate and should also use species that are able to adapt to changing climate conditions (see Policies DLP33 and DLP34).
 - e. all development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces. Schemes should also make provision for sustainable drainage infrastructure, which should be built into landscaping schemes / open space provision as appropriate (see Policies DLP45 and DLP46).
 - f. development will be required to incorporate mitigation and resilience measures designed to reduce the risk of river, surface and other potential water flooding (see Policies DLP45 and DLP46).
 - g. the conversion of non-domestic buildings to residential use will be expected to employ high environmental standards, incorporating improved thermal insulation, appropriate levels of natural ventilation and measures to improve water efficiency.
 - h. proposals for increasing the energy efficiency and resilience to climate change of designated heritage assets will be supported only where this will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP41	+	+	+	++	+	+	+	0	+	0	0	+	0	0

- D.9.1.1 Policy DLP41 aims to ensure that development proposals seek opportunities for adaptation to, and mitigation of, climate change. This would help to promote sustainable development throughout the Plan area and help to protect the environment.
- D.9.1.2 This policy supports the development of energy efficient technologies associated with historic assets as long as the development *"will not cause demonstrable harm to the historic fabric, character, setting or appearance of the asset"*. Therefore, a minor positive impact on cultural heritage would be anticipated (SA Objective 1).
- D.9.1.3 The policy requires development proposals to *"protect and support biodiversity networks"*, to incorporate *"landscaping schemes"* and to be designed *"using a mix of tree species and plants where appropriate"*. This policy could potentially help to protect and enhance, and therefore have a minor positive impact in relation to, biodiversity and landscape character (SA Objectives 2 and 3).
- D.9.1.4 In addition to increased green cover, the policy states that *"all development will need to minimise the impact of surface water runoff through the design of proposed drainage systems, including where possible grey water recycling and rainwater collection, and the use of permeable surfaces"*. These requirements would help to provide mitigation for potential fluvial or surface water flood events. Therefore, a minor positive impact on climate change adaptation would be expected (SA Objective 5). In addition, these requirements will likely benefit water efficiency, leading to a minor positive impact on natural resources (SA Objective 6).
- D.9.1.5 Enhanced green cover alongside amenity areas, buildings and streets could potentially help to promote natural air filtration, and as such, reduce residents' exposure to transport-associated air pollution. Furthermore, providing a more attractive local area could potentially encourage walkable neighbourhoods and facilitate outdoor exercise. Policy DLP41 also requires development proposals to consider accessibility via *"a range of sustainable and low carbon transport modes as alternatives to private car use"*. This would be likely to promote sustainable travel and contribute towards reducing local GHG emissions, as well as improving access via walking and cycling to encourage the uptake of active travel. This policy states that new development should incorporate natural heating and ventilation, wherever possible. This would be expected to ensure that living conditions are of a high quality. Overall, a minor positive impact on local air quality, accessibility and human health would be expected (SA Objectives 7, 9 and 12).
- D.9.1.6 The incorporation of green cover, minimisation of flood risk, use of greywater recycling and promotion of natural heating systems would be expected to help reduce the Plan area's contributions to the causes of climate change. By requiring adaptation and mitigation measures to ensure that development proposals are resilient in the face of climate change, this policy would be expected to have a major positive impact on climate change mitigation (SA Objective 4).

D.9.2 Policy DLP42 – Energy Infrastructure

Policy DLP42 – Energy Infrastructure

- 1) Decentralised energy and communal heating provision

Policy DLP42 – Energy Infrastructure

- a. Any development including ten homes or more, or non-residential floorspace of 1,000 sq. m or more must include opportunities for decentralised energy³⁷ provision within the site, unless it can be demonstrated that the development is not suitable, feasible or viable for district heat³⁸ or decentralised power networks.
- b. Where there is existing decentralised energy provision available close to the site, the development will be expected to link into it, or should be designed to accommodate a subsequent connection³⁹ if a source has not yet become operational. Information on this linkage should be included in a design and access or planning statement, which should also explain how access to a decentralised network can be achieved in the future if it is not currently operational or available.
- c. Where developers can demonstrate to the satisfaction of the LPA that a link to an existing or committed decentralised energy source nearby is not viable, the local authority will support the provision of alternative onsite carbon elimination measures that can be incorporated into the scheme (see Policy DLP47).
- d. Proposals intended to deliver decentralised networks and related infrastructure will need to prevent or minimise any adverse impacts on the historic environment by ensuring that they protect the significance of heritage assets, including their setting.

Onsite energy provision

- 2) Developers should engage with relevant energy companies and bodies at an early stage in the development process to establish the likely future energy and infrastructure requirements arising from large-scale development proposals including 100 homes or more, or non-residential floorspace of 10,000 sq m or more. Proposals for addressing energy provision on such sites should be developed and agreed between the local planning authority and developer(s) to establish the lowest lifetime carbon energy provision. Information to support the preferred solution(s) should identify and address:
 - a. Current and future major sources of demand for heat (e.g. sites such as industrial / manufacturing sites, universities, large-scale sporting or leisure development, hospitals and social housing);
 - b. demands for heat from existing buildings that can be connected to future phases of a heat network;
 - c. major heat supply plant;
 - d. possible opportunities to utilise energy from waste or waste heat from industrial processes;
 - e. opportunities for heat networks;
 - f. opportunities for private wire electricity supply;
 - g. possible land for energy centres and / or energy storage;
 - h. possible heating and cooling network routes;

³⁷ Energy that is generated off the main grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, communal or district heating and cooling, as well as geothermal, biomass or solar energy. Decentralised heat or power networks can serve a single building or a whole community, even being built out across entire cities - Carbon Trust - decentralised energy definition

³⁸ <https://www.gov.uk/guidance/heat-networks-overview>

³⁹ Where a decentralised energy source is extant or will become operational during the construction of the development, and a proposed linkage has been agreed, suitable means of access / connection should be provided along roads / footpaths as a minimum form of infrastructure.

Policy DLP42 – Energy Infrastructure

- i. infrastructure and land requirements for electricity and gas supplies;
 - j. implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.
- 3) Where applicable the local authority will:
- a. identify any necessary energy infrastructure requirements, including upgrades to existing infrastructure;
 - b. identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new ones.

Heating / hot water systems

- 4) Heat sources for a communal heating system should be chosen to minimise likely emissions and to make best use of any local decentralised networks, in preference to other solutions. These systems should be individually controllable by households and usage should be able to be monitored down to the individual dwelling level.
- 5) Where a communal heating system is provided, development proposals must provide evidence to show that NOx emissions related to energy generation will be equivalent to or lower than those of an ultra-low NOx⁴⁰ gas boiler.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP42	0	0	0	+	+	0	+	0	0	0	0	+	0	0

D.9.2.1 Policy DLP42 aims to encourage the use of decentralised energy sources and district heat networks within development proposals and, where appropriate, the use of communal heating systems to reduce GHG emissions and support regional and national targets to achieve Net Zero carbon emissions. More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a decrease in GHG emissions released through the generation of energy. Policy DLP42 would therefore be likely to have a minor positive impact in relation to climate change mitigation (SA Objective 4). By identifying and improving heating and cooling networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5).

D.9.2.2 In addition, through improved energy efficiency and a reduction in GHG emissions and air pollutants, this policy would be likely to result in health benefits. Furthermore, promoting sustainable and efficient heating and cooling systems could help to ensure safe and healthy living environments. Therefore, this policy would be expected to have a minor positive impact in regard to pollution and human health (SA Objectives 7 and 12).

⁴⁰ Ultra-low NOx boiler Standard specified in the Black Country Air Quality Supplementary Planning Document.

D.9.3 Policy DLP43 – Managing Heat Risk

Policy DLP43 – Managing Heat Risk

- 1) Development proposals⁴¹ should minimise both internal heat gain and the impacts of urban heat islands⁴² by using appropriate design, layout, orientation and materials.
- 2) Development proposals will be expected to demonstrate how their potential for overheating and reliance on artificial cooling systems will be reduced, in accordance with the following cooling hierarchy:
 - a. minimise internal heat generation through energy-efficient design;
 - b. reduce the amount of heat entering a building through orientation, shading, albedo⁴³, fenestration, insulation and the provision of green roofs and walls (see also Policy DLP39 - Design);
 - c. manage heat within a building through exposed internal thermal mass⁴⁴ and high ceilings;
 - d. provide passive ventilation;
 - e. provide mechanical ventilation;
 - f. provide active cooling systems⁴⁵.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP43	0	0	+	+	+	0	+	0	0	0	0	0	0	0

D.9.3.1 Efficient design and building of development proposals can help to reduce the risk of heat gain and the urban heat island effect (UHI). UHI refers to an urban area which is significantly warmer than the surrounding rural areas, caused primarily by human activity. This could potentially be an issue within Dudley due to the predominantly urban area, tall buildings and large population. The policy states that "*energy-efficient design*", "*passive ventilation*" and "*active cooling systems*" will be required within developments. This would be expected to help reduce heat gain and the UHI effect, reduce the amount of energy needed to cool buildings and reduce heat lost to the environment. This policy would therefore be likely to have minor positive impacts in relation to climate change mitigation, climate change adaptation and pollution (SA Objectives 4, 5 and 7).

D.9.3.2 Furthermore, Policy DLP43 encourages "*provision of green roofs and walls*" which could potentially help to support wildlife networks and opportunities for habitat creation amongst

⁴¹ Excluding domestic extensions.

⁴² Caused by extensive built-up areas absorbing and retaining heat.

⁴³ The reflectivity of a surface. A high albedo surface reflects the sun's heat back into the atmosphere; Low albedo surfaces absorb it. Pale coloured surfaces have a high albedo and can help to minimise heat gain.

⁴⁴ 'Thermal mass' is a material's capacity to absorb, store and release heat.

⁴⁵ Systems using energy to provide cooling. They circulate a coolant (gas, fluid) to transfer heat from one place to another.

the urban area. Therefore, this policy could result in a minor positive impact on biodiversity (SA Objective 3) as well as further benefits in terms of climate change adaptation.

D.9.4 Policy DLP44 – Air Quality

Policy DLP44 – Air Quality

Strategic Approach

- 1) The DLP will promote a diverse approach to addressing the issue of poor air quality across the borough, including:
 - a. requiring development and other land use proposals to promote the integration of cycling, walking, public transport and electric charging points as part of their transport provision;
 - b. promoting and supporting (including through continued joint working with authorities inside and outside the Black Country) a modal shift from private motorised vehicles to the use of clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks, cycling and walking;
 - c. requiring the provision and protection of green open spaces and significant additional tree cover (see also DLP33);
 - d. ensuring the sustainable location of new residential and employment development to minimise commute times; and
 - e. as part of an integrated zero-emission public transport system, promoting and requiring the use of sustainable technologies, zero-emission vehicles, design and materials and providing new or extended bus services to meet demand when development of a strategic nature is planned and constructed.
- 2) New development must be at least air quality neutral following any required mitigation. Planning permission for new development or changes of use will be refused where data assessment indicates that development will:
 - a. lead to deterioration of existing poor air quality;
 - b. create any new areas that exceed air quality objectives; or
 - c. delay compliance being achieved in areas that are currently in exceedance of legal limits unless sufficient mitigation can be achieved.

Improving air quality

- 3) Residential or other sensitive development such as schools, hospitals / health care and care facilities should be sited in areas where air quality already meets national objectives, or where compliance with those objectives can be achieved with suitable mitigation proposed as part of the development proposal and verified as being achieved before occupation of the development.
- 4) Developments that will have a moderate air quality impact, and which can be dealt with through standard mitigation measures, will not require an air quality assessment.
- 5) Whenever development is proposed in locations where air quality does not / will not meet national objectives, or where significant air quality impacts are likely to be generated onsite or elsewhere by the development itself or its subsequent use / activities, an appropriate Air Quality Assessment will be required to demonstrate that the proposed development will improve air quality in order that it will meet air quality objectives once the development is completed and occupied / operational:
 - a. the assessment must take into consideration the potential cumulative impact on air quality of all extant planning permissions in the locality, for both large / strategic and small schemes.

Policy DLP44 – Air Quality

- b. the impact of point source emissions of pollutants to air on the scheme (pollution that originates from one place) must also be considered.
 - c. the assessment must take into consideration the types of pollutant emissions likely to be generated by the development and its future use / associated activities that will have an impact on human health.
 - d. where assessments show that a development is likely to result in exposure to pollutant concentrations that exceed national objectives, a mitigation plan will be required to determine that the development will improve air quality, in order that it will meet air quality objectives once it is complete and occupied / operational.
 - e. adequate and satisfactory mitigation measures that are capable of implementation, including the planting of additional and replacement trees in appropriate locations, must be identified, submitted as part of an application, and made subject to appropriate conditions before planning permission is granted.
- 6) Developments should not include materials or be positioned or ventilated in a way that would result in poor indoor air quality. Guidance will be provided to detail how such issues should be addressed.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP44	0	0	+	+	0	0	++	0	+	0	0	+	+	0

D.9.4.1 Air pollution is a significant concern internationally and locally. Dudley Borough as well as the neighbouring authorities of Sandwell, Walsall and Wolverhampton, are designated as Air Quality Management Areas (AQMAs)⁴⁶. Development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.

D.9.4.2 Policy DLP44 requires development proposals to promote the use of pedestrian and cycle routes, access to rail, the Metro and bus transport networks, plus provide electric car charging points. These measures would be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of air quality, electric vehicles are an effective alternative to petrol- or diesel-powered vehicles as they emit fewer, or zero, emissions (see Policy DLP74). By discouraging the use of private cars, this policy would be expected to help reduce transport-associated emissions and have a positive impact on local air quality. The policy also requires new development to be air quality neutral as a minimum.

D.9.4.3 Where a development proposal is situated in a location that does not currently meet national objectives, the policy requires an appropriate Air Quality Assessment to be carried

⁴⁶ DEFRA (2023). List of Local Authorities with AQMAs. Available at: <https://uk-air.defra.gov.uk/aqma/list> [Date accessed: 30/06/23]

out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, Policy DLP44 would be expected to have a major positive impact on air pollution (SA Objective 7).

- D.9.4.4 The requirements set out in the policy could potentially help to minimise the Plan area's contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact would therefore also be expected for climate change mitigation (SA Objective 4).
- D.9.4.5 As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods and electric car charging points, including the proposed integrated zero-emission public transport system, would be expected to have a minor positive impact on transport and accessibility (SA Objective 9).
- D.9.4.6 Policy DLP44 aims to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy aims to increase the provision of green and open spaces across the borough. This would be likely to facilitate healthy lifestyles, through promoting outdoor exercise and leading to benefits for the mental wellbeing of residents. Overall, this policy would be likely to have a minor positive impact in regard to human health (SA Objective 12).
- D.9.4.7 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).
- D.9.4.8 In addition, this policy requires development proposals to be situated in a sustainable location to minimise commuter distance and time. This would be likely to situate residents in close proximity to a range of job opportunities, and therefore, have a minor positive impact on the local economy (SA Objective 13).

D.9.5 Policy DLP45 – Flood Risk

Policy DLP45 – Flood Risk

- 1) Dudley will seek to minimise the probability and consequences of flooding from all sources by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the National Planning Policy Framework.
- 2) The Sequential Test will:
 - a. be applied to all developments to ensure that development takes place in areas with the lowest flood risk, in line with NPPF requirements.
 - b. take account of the most up-to-date information on river (fluvial) flooding and all other sources of flooding, making use of the information provided in the most recent Strategic Flood Risk Assessment (SFRA);
 - c. consider the impact of climate change over the lifetime of that development.
- 3) Developers should apply the Sequential Test to all development sites, unless the site is:
 - a. a strategic allocation and the test has already been carried out by the LPA; or
 - b. a change of use (except to a more vulnerable use); or

Policy DLP45 – Flood Risk

- c. a minor development (householder development, small non-residential extensions with a footprint of less than 250m²); or
 - d. a development in Flood Zone 1, unless there are other flooding issues in the area of the development (i.e. surface water, ground water, sewer flooding). The SFRA can be used to identify where there are flooding issues from sources others than rivers.
- 4) Developers should provide evidence to the LPA that they have considered all reasonably available alternative sites that are at a lower risk of flooding prior to determining the suitability of the chosen site for the proposed development type, in relation to all sources of flood risk on it.
- 5) For all developments the vulnerability of the development type to flooding should be considered with regard to the most up-to-date flood zone information in accordance with the NPPF, as set out below:

Flood Zone 3

- 6) Where the site is in Flood Zone 3b (Functional Floodplain), all development other than essential infrastructure (subject to the Exception Test) will be refused (including extensions and intensification of use and changes of use) and opportunities to relocate development out of the floodplain should be sought.
- 7) Where the site is in Flood Zone 3a (High Probability), new homes can only be permitted subject to the Exception Test.
- 8) Flood Zone 2
- a. Where the site is in Flood Zone 2 (Medium Probability), most development can be permitted, subject to a site-specific flood risk assessment;
 - b. Highly vulnerable developments, such as caravans, mobile homes and park homes with permanent residential use can be permitted, subject to the Exception Test;
 - c. Where the site is in Flood Zone 1 (Low Probability), the information in the most up to date SFRA should be used to assess if a development is at risk from other sources of flooding and / or if there is an increased risk of flooding in the future due to climate change. If this site is shown to be at risk, a site-specific flood risk assessment should accompany a planning application.
- 9) To pass the Exception Test, developments will need to:
- a. provide a demonstrable benefit to the wider sustainability of the area. Matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health, transport should be considered;
 - b. detail the sustainability issues the development will address and how doing so will outweigh the flood risk concerns for the site;
 - c. prove that the development will be safe from flooding for its lifetime, taking account of the vulnerability of its users;
 - d. prove that the development can be achieved without increasing flood risk elsewhere, and, where possible, will result in a reduced flood risk overall.
- 10) All new developments in the following locations should be accompanied by a flood risk assessment and surface water drainage strategy that sets out how the development will provide a betterment in flood risk terms i.e. help to reduce flood risk both on and off site:
- a. where any part of the site is within Flood Zone 2 or Flood Zone 3;
 - b. where the site is greater than one hectare and is within Flood Zone 1;
 - c. where the site is within five metres of an ordinary watercourse;
 - d. where the site is within 20m of a known flooding hotspot;

Policy DLP45 – Flood Risk

- e. where the site is within the 1 in 100-year flood extent based on the Risk of Flooding from Surface Water Map.

11) Surface Water Drainage Strategies are also required for all major developments. These should consider all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere.

Watercourses and flood mitigation

12) Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements; reference should be made to the latest River Basin Management Plans for the area.

13) Developers should set out how their mitigation designs will ensure that there is no net increase to fluvial flood risk downstream and where practicable how the development could help mitigate against downstream fluvial flood risk.

14) Development should not take place over culverted watercourses and a suitable easement should be provided from the outside edge of the culvert.

15) There should be no built development within five metres of an ordinary watercourse and within ten metres of the top of the bank of a main river. This is to enable the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement.

16) Where there is a known or suspected culverted watercourse either on or immediately downstream of a site, where the SFRA highlights there may be a risk of flooding, developers should:

- a. confirm the location and presence of a watercourse (or otherwise) through ground-truthing strategic datasets and undertaking an assessment of the culvert extent and condition.
- b. confirm by survey, modelling and mapping, the flood extents of the watercourse(s), as many of the flood outlines associated with such watercourses have been carried out at a broad scale level and may not take into account specific local features, such as culverts, bridges and detailed topographical survey.
- c. design the development to accommodate the floodplain of the watercourse and mitigate against flooding to properties on the site. This should include a consideration of residual flood risk e.g. if a culvert were to block downstream.

17) All developments should seek to provide wider betterment by demonstrating in site-specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes (both within Dudley, the Black Country and in shared catchments with Southern Staffordshire and Birmingham). Consultation on the site-specific requirements should be undertaken with the Council, the Environment Agency, and Severn Trent Water (where this is a sewer flooding issue) at the earliest opportunity.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP45	0	0	+	0	++	0	+	0	0	0	0	+	0	0

D.9.5.1 Policy DLP45 seeks to manage the risk of flooding throughout Dudley and ensure that measures are in place within new developments to promote resilience to flooding.

D.9.5.2 The policy sets out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. The policy states that all development proposals should incorporate SuDS to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaption would be anticipated (SA Objective 5).

D.9.5.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies⁴⁷. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas would therefore be expected to have benefits to human health (SA Objective 12).

D.9.5.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments would be expected to benefit water quality, biodiversity and amenity interest through the integration into the wider green and blue infrastructure networks and promoting natural management of flood water. In line with the policy developments should, where possible, naturalise urban watercourses and open up underground culverts *"to provide biodiversity net gain as well as amenity improvements"*. This would be likely to benefit biodiversity and provide opportunities for habitat connectivity and the filtration of pollutants. Therefore, Policy DLP45 would be likely to have a minor positive impact on biodiversity and pollution (SA Objectives 3 and 7).

D.9.6 Policy DLP46 – Sustainable Drainage and Surface Water Management (SuDS)

Policy DLP46 – Sustainable Drainage and Surface Water Management (SuDS)

- 1) All new developments should incorporate SuDS and all development proposals should provide details of adoption, ongoing maintenance, and management of SuDS.

⁴⁷ Public Health England (2014) Flooding and the public’s health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/>
 [Date accessed: 09/10/23]

Policy DLP46 – Sustainable Drainage and Surface Water Management (SuDS)

- 2) SuDS shall be designed in line with the Black Country Local Standards for SUDS. Preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area.
- 3) For all major developments, surface water flows must be reduced back to equivalent greenfield rates. If greenfield runoff rates are not considered to be feasible for viability reasons, then the developer must submit evidence demonstrating what the constraints to achieving this are and how their development will accommodate runoff rates that are as close as reasonably possible to greenfield rates.
- 4) Under no circumstances will post-development runoff rates that are greater than pre-development runoff rates be permitted.
- 5) Surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in to meet the requirements of the Lead Local Flood Authority(s). These should take into account all sources of flooding to ensure that future development is resilient to flood risk and does not increase flood risk elsewhere and should look to provide wider betterment.
- 6) A hydrogeological risk assessment is required where infiltration SuDS are proposed for anything other than clean roof drainage in a Source Protection Zone 1.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP46	0	0	+	0	+	0	0	0	0	0	0	0	0	0

D.9.6.1 Policy DLP46 sets out guidelines for future development with respect to Sustainable Drainage and Surface Water Management. The policy requires developments to incorporate SuDS designed in line with local standards which would be anticipated to help reduce the risk of surface water flooding. The policy states that “*surface water drainage strategies are required for all major developments, regardless of their size and the flood zone and catchment they are in*”, taking into account all sources of flooding. The policy further encourages development proposals to “*look to provide wider betterment*” in addition to ensuring post-development runoff rates are not greater than pre-development rates, leading to benefits in terms of flood resilience. This policy would be expected to have a minor positive impact on climate change adaptation (SA Objective 5).

D.9.6.2 The policy also encourages multi-functional SuDS schemes, stating that “*preference will be given to systems that contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area*”, potentially leading to a minor positive impact on biodiversity (SA Objective 3).

D.9.7 Policy DLP47 – Renewable and Low Carbon Energy and BREEAM Standards

Policy DLP47 – Renewable and Low Carbon Energy and BREEAM Standards

Renewable and Low Carbon Energy

- 1) Proposals involving the development of renewable or low carbon energy sources will be permitted where the proposal accords with local and national guidance, protects the significance of heritage assets including their setting and would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby, in terms of visual (including glare), noise, odour, air pollution or other effects. The potential for inland waterways to promote low carbon technologies is recognised and supported.
- 2) Small developments creating between one and nine homes or non-residential floorspace of less than 1,000 sqm gross (whether new build or conversion) must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 10% of the estimated residual energy demand⁴⁸ of the development on completion.
- 3) Major developments creating ten or more homes or non-residential floorspace of 1,000 sqm gross or more (whether new build or conversion) must incorporate generation of energy from renewable or low carbon sources sufficient to off-set at least 20% of the estimated residual energy demand of the development on completion.
- 4) A variety of renewable and low-carbon energy sources and generation methods should be assessed and costed, including on-site and off-site sources where appropriate, and the use of district heat and / or decentralised energy networks. An energy assessment must be submitted with the planning application to demonstrate that these requirements have been met.
- 5) The renewable energy target will only be reduced only if it can be demonstrated that achievement of the target would:
 - a. make the proposal unviable through submission of an independently assessed financial viability appraisal; or
 - b. would not be feasible due to practical constraints.

BREEAM Standards

- 6) All new build non-residential developments, student housing and care homes of 1,000 sqm gross or more should achieve the following standards of BREEAM New Construction certification, including full credits for category Wat 01 (water efficiency) in line with Policy DLP39:

Size	Standard	Year
1,000-5,000 sqm gross:	BREEAM Very Good	up to 2029*
	BREEAM Excellent	2029-2039*
>5,000 sqm gross:	BREEAM Excellent	

* Year refers to date planning permission is granted

- 7) BREEAM requirements may be varied if it can be demonstrated that achievement of the standard would make the proposal unviable, through submission of an independently assessed financial viability appraisal.

⁴⁸ Residual energy demand means that the estimated energy demand for the operational development after allowance has been made for the full range of energy efficiency measures required under Building Regulations (at the time of construction).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP47	0	0	0	+	0	0	+	0	0	0	+	+	0	0

- D.9.7.1 The promotion of on-site renewable or low carbon technologies incorporated within new development in Dudley would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs that are emitted into the atmosphere. This in turn would reduce the Plan area’s contribution towards the causes of climate change. Policy DLP47 requires all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards⁴⁹. The policy states that development proposals should in particular achieve full credits for category Wat 01 (water efficiency).
- D.9.7.2 This policy would be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4). Promoting energy efficient homes could contribute towards creating healthy living environments and help to achieve affordable warmth. A minor positive impact on equality and health could therefore occur (SA Objectives 11 and 12).
- D.9.7.3 Although this policy would help to ensure that 20% of energy used for major developments is from renewable sources, only a 10% renewable energy target is set for development between one and nine dwellings. This policy could potentially be further expanded to help to ensure future development within Dudley aims to reach higher energy efficient targets from renewable and low carbon technologies.
- D.9.7.4 The promotion of alternative renewable and low carbon technologies would be likely to result in reduced emission of pollutants. This would be expected to have a minor positive impact on pollution in the Plan area (SA Objective 7). Improved air quality could also lead to benefits for human health.
- D.9.7.5 Furthermore, by ensuring that development “*protects the significance of heritage assets including their setting and would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby*” the policy would be expected to reduce the potential for adverse impacts on cultural heritage, landscape, biodiversity and human health. Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 2, 3 and 12).

⁴⁹ BREEAM (2018) New Construction Technical Standards. Available at: <https://www.breeam.com/discover/technical-standards/newconstruction/> [Date accessed: 20/06/23]

D.9.8 Policy DLP48 – Water Quality and Groundwater Source Protection Zones

Policy DLP48 – Water Quality and Groundwater Source Protection Zones

- 1) Development should follow the hierarchy (order of preference for foul drainage connection), as set out in the National Planning Practice Guidance. The Council requires non mains drainage proposals to assess the potential impacts upon water quality to ensure no detrimental impact on the water environment.
- 2) Proposals that would result in an unacceptable risk to the quality and / or quantity of a water body or water bodies will not be permitted. Strategies to help mitigate the impact of development on water quality will be required at planning application stage.
- 3) No development will be permitted within a groundwater Source Protection Zone that would physically disturb an aquifer, and no permission will be granted without a risk assessment demonstrating there would be no adverse effect on water resources.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP48	0	0	0	0	0	+	+	0	0	0	0	0	0	0

- D.9.8.1 Policy DLP48 sets out the requirements for identifying and addressing potential water quality impacts associated with new development. Development proposals will not be permitted *"within a groundwater Source Protection Zone that would physically disturb an aquifer"* and permission will not be granted without a risk assessment that provides evidence of no adverse effect on water resources. Therefore, it can be expected to create minor positive impacts on natural resources within the borough (SA Objective 6).
- D.9.8.2 The policy also ensures that development proposals that *"result in an unacceptable risk to the quality and / or quantity of a water body or water bodies will not be permitted"* and ensure development has *"no detrimental impact on the water environment"*. This would be expected to have a minor positive impact on water pollution in the Plan area (SA Objective 7).
- D.9.8.3 The policy would be expected to reduce the potential for adverse impacts on biodiversity and human health associated with the water environment, for example biodiversity sites which are sensitive to changes in water quality or quantity. Therefore, negligible impacts could be expected for these objectives (SA Objectives 3 and 12).

D.10 Green Infrastructure

D.10.1 Policy DLP49 – Green Belt

Policy DLP49 - Green Belt

- 1) In support of the Development Strategy (Policy DLP1) for the borough, a strong Green Belt will be maintained to promote redevelopment and regeneration within the urban area and provide easy access to the countryside where the landscape, visual amenity, nature conservation and outdoor sport and recreation value of the land will be protected and enhanced (where possible, and where in accordance with national and local planning policy).
- 2) The boundaries and extent of the Green Belt in Dudley Borough are shown on the Policies Map. Proposals for development within the Green Belt will be considered in accordance with national planning policy and guidance on this matter, and Policy DLP50. In accordance with national planning policy, there shall be a presumption against inappropriate development in the Green Belt, which should not be approved except in very special circumstances. Proposals will be expected to provide sufficient supporting information to enable an assessment against the national planning policy provisions for development within the Green Belt.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLP49	0	+	0	0	0	+	0	0	0	0	0	+	0	0

D.10.1.1 Paragraph 137 of the NPPF⁵⁰ states *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*. Policy DLP49 aims to maintain a strong Green Belt that will promote development within the urban area, whereby any future development proposals within the Green Belt will be considered in line with the NPPF guidance.

D.10.1.2 The maintenance of the Green Belt will help to ensure that these areas can *"provide easy access to the countryside where the landscape, visual amenity, nature conservation and outdoor sport and recreation value of the land will be protected and enhanced"*. Therefore, the policy would be likely to result in a minor positive impact on the landscape character and additionally positively impact upon natural resources, as the measures promote an efficient use of land, encouraging development within the existing urban area and preventing the loss of undeveloped land for built form (SA Objectives 2 and 6).

D.10.1.3 Policy DLP49 supports proposals for beneficial uses of the Green Belt, including for protection and enhancement of outdoor sport and recreation uses. The nature of such

⁵⁰ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 09/10/23]

proposals is uncertain at this stage, however, there is potential for enhanced access to recreational facilities and open space, and a minor positive impact on the health and wellbeing of residents could therefore be expected (SA Objective 12).

D.10.2 Policy DLP50 – Agricultural and Rural Workers Dwellings in the Green Belt

Policy DLP50 – Agricultural and Rural Workers Dwellings in the Green Belt

- 1) If a new dwelling is proposed as essential to support a farming activity or other rural enterprise, whether on a newly-created agricultural unit or an established one, it should normally, for the first three years, be provided by temporary accommodation.
- 2) Any new permanent agricultural, forestry, horticulture or other essential rural workers dwellings will only be allowed if the following circumstances can be demonstrated;
 - a. there is a clearly established existing functional need
 - b. the need relates to a full-time worker, or one who is primarily employed in agriculture and does not relate to a part-time requirement
 - c. the residential unit and the agricultural activity concerned have been established for at least 3 years, and can be clearly demonstrated to be an economically viable use
 - d. the functional need could not be fulfilled by another existing dwelling at the planning unit, or any other existing accommodation in the local area which is suitable and available for occupation by the worker(s) concerned
 - e. a dwelling which has served the holding has not recently been severed off or sold off from the holding
 - f. the proposed dwelling is of a size and type commensurate with its established functional requirement.
- 3) Where temporary or permanent planning permission is granted, the Council will impose an Agricultural Occupancy Condition to ensure that the dwelling is used only for purpose of housing essential workers in accordance with this policy.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP50	0	0	0	0	0	0	0	0	0	+	0	0	+	0

D.10.2.1 Policy DLP50 provides specific criteria for agricultural and rural worker dwellings within the Green Belt and aims to support farming activity or other rural enterprises through the provision of such dwellings. Development proposals for agricultural and rural worker dwellings will align with national Green Belt policy (i.e. the NPPF).

D.10.2.2 The measures set out in the policy will potentially help to support the rural economy and can be expected to have a minor positive impact on the economy (SA Objective 13).

- D.10.2.3 Policy DLP50 could also lead to small-scale increases the housing provision in the borough, providing a varied mix of housing, with potential for a minor positive impact on housing (SA Objective 10).

D.10.3 Policy DLP51 – Dudley Borough’s Green Infrastructure Network

Policy DLP51 – Dudley Borough’s Green Infrastructure Network

- 1) The Green Network constitutes Dudley Borough’s strategic Green Infrastructure, and comprises the following designations shown on the Policies Map:
 - a. Green Belt/Green Wedges
 - b. Special Areas of Conservation (SAC)
 - c. Linear Open Space areas
 - d. areas of designated nature conservation and geological value including Sites of Special Scientific Interest (SSSI), Local and National Nature Reserves (LNR/NNR), Sites of Importance for Nature Conservation (SINC) and Sites of Local Importance for Nature Conservation (SLINC)
 - e. Accessible Natural Greenspace
 - f. other formal and informal open space areas
 - g. Wildlife Corridors
 - h. Existing or proposed linking areas of townscape or landscape
 - i. Canals and watercourses particularly the River Stour and its tributaries
 - j. Railway corridors
- 2) While certain sections of the Green Network will, depending on their inherent value or potential, have a focus on a particular open space/nature conservation aspect, overall the network has a multi-functional role as;
 - a. a wildlife corridor, to provide coherent ecological networks
 - b. accommodating pedestrian and cycle paths, particularly in linking the urban area with the Green Belt and open countryside as well as linking towns and places of employment with residential communities
 - c. providing opportunities for informal recreation
 - d. helping to form a break between locally distinct areas and centres
 - e. grazing land for horses and other livestock
 - f. a means of maintaining the integrity of water courses across the Borough as well as enhancing the natural value and restoration of water courses including de-culverting where opportunities arise.
- 3) All development proposals except householder applications, falling within or adjoining, the Green Network need to demonstrate how the proposal:
 - a. complies with the aims and role of the Green Network
 - b. enhances or adds value to the Green Network, particularly in providing green infrastructure which would strengthen the network or greening sections of the network where such infrastructure is absent.
 - c. shall have a design and layout which would complement and enhance the intended functions of the network. This includes strengthening and supporting existing wildlife corridors through habitat creation and restoration and providing opportunities for outdoor recreation, such as

Policy DLP51 – Dudley Borough’s Green Infrastructure Network

walking and cycling to promote healthy lifestyles and provide an alternative to help reduce congestion and improve air quality throughout the borough.

- 4) The Green Network shall have a minimum width of 15 metres unless it is satisfactorily demonstrated to be unachievable. Any proposed development which has the effect of narrowing the corridor below this threshold will not normally be supported.
- 5) Wherever possible, all sections of the Green Network shall seek to accommodate a footpath and cycleway which, when combined, shall be no less than 3.3 metres in width. The layout and route of such paths will be influenced by the nature of the network particularly so as to avoid any undesirable impact on habitats however the requirement will be to achieve a coherent, linked network of paths and cycleways.
- 6) Where existing townscape forms part of the Green Network and it is satisfactorily demonstrated that there are limited opportunities to provide a linking area of open space, Dudley Council will seek alternative means of providing continuous green linkages within developments, for example, through the provision of green roofs and green walls, street trees and boulevards. This is as long as such a provision would not prejudice the character and distinctiveness of the local environment.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLP51	0	+	+	+	+	0	+	0	+	0	0	+	+	0

D.10.3.1 Policy DLP51 sets out the definition of the borough’s Green Network and measures that will ensure the protection of the network and the enhancement of the network to ensure that absent sections are covered by GI. GI is a multi-functional feature and has a range of benefits including: helping to mitigate extreme temperatures and flooding; habitat protection and creation; pollution reduction; and providing open land for recreation and breathing space to benefit residents’ physical and mental health.

D.10.3.2 The policy ensures that all development proposals will *"enhance or add value to the Green Network, particularly in providing green infrastructure"* and would also have a design which includes *"strengthening and supporting existing wildlife corridors through habitat creation and restoration"*. The measures under the policy would ensure that any development contributes to the strengthening of the green network in the borough, conserving and enhancing its role in providing habitats and improving ecological connectivity, which would be expected to have a minor positive impact on biodiversity (SA Objective 3).

D.10.3.3 The policy states that opportunities for additional green linkages will be explored within developments that include *"green roofs and green walls, street trees and boulevards"* that would be provided as long as they *"would not prejudice the character and distinctiveness of the local environment"*. Green linkages would be expected to strengthen the overall GI network within the borough and can contribute to enhancing local landscapes. Additionally, the green linkages would contribute to climate change adaptation by enhancing GI coverage and the ecosystem services it provides. The policy would therefore

be expected to have a minor positive impact on landscape and climate change adaptation (SA Objectives 2 and 5).

- D.10.3.4 Measures under the policy would be expected to benefit the health and wellbeing of residents, through the provision of green spaces that encourage more active lifestyles. The policy states that green network will aim to "*achieve a coherent, linked network of pathways and cycleways*". The provision of active travel networks would promote healthier lifestyle choices and also could result in less reliance on the use of private cars for travel, that can reduce congestion and have a positive impact on air pollution within the borough. The policy would be expected to have a minor positive impact on climate change mitigation, air pollution, transport, and health (SA Objective 4, 7, 9, and 12).
- D.10.3.5 Furthermore, the protection and creation of GI provides the opportunity to improve the local economy through the enhancement of the local environment, increasing property values, attracting inward investment, and potentially supporting economic growth. A minor positive impact on the local economy (SA Objective 13) could therefore be achieved.
- D.10.3.6 It is recommended that the policy and/or supporting text refers to the principles of Natural England's emerging GI Framework⁵¹ to ensure that GI is well designed and effective.

D.10.4 Policy DLP52 – The Borough's Geology

Policy DLP52 – The Borough's Geology

- 1) The Council will seek to safeguard and maximise the benefits of the Borough's unique and internationally recognised geology by requiring development to prescribe to and apply the relevant guidelines contained within the Council's latest Nature Conservation Supplementary Planning Document with the priority on preventing harm to sites of recognised (or anticipated and subsequently demonstrated) geological importance or mitigating with appropriate remedial actions where agreed.
- 2) Sites and connectivity particularly referred to by this policy includes:
 - a. National and Local Nature reserves with unique/ nationally important geological heritage (NNRs LNRs)
 - b. Sites of Special Scientific Importance (SSSIs)
 - c. Sites of Importance for Nature Conservation identified with regionally important geological heritage (SINCs)
 - d. Other important geological sites within the context of the Black Country UNESCO Global Geopark (See Policy DLP35) including Sites of Local Importance for Nature conservation (SLINCs) etc
 - e. Geological Consideration Zones (GCZ)
- 3) Where consequential harm to geodiversity occurs as a result of a development, the level of improvement works needed to balance and or mitigate this will be assessed on a site-by-site basis.
- 4) Maintaining and enhancing the Borough's geology will be ensured by;
 - a. Ensuring compliance with any existing site/feature management plans and ongoing processes.

⁵¹ Natural England (2023) Introduction to the Green Infrastructure Framework – Principles and Standards for England. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date accessed: 17/08/23]

Policy DLP52 – The Borough’s Geology

- b. Encouraging the acquisition of new data via such things as permitting access for and encouraging on-site geological recording particularly where development creates new geological exposures (whether as temporary excavations or permanent landscape adjustments).
- c. The provision of new facilities and features associated with the management, display and interpretation of the geological resource including those which would contribute positively to Dudley Borough, or collectively along with the other Black Country Authorities, as part of the UNESCO Global Geopark delivery.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP52	0	+	+	0	0	0	0	0	0	0	0	0	0	0

D.10.4.1 Policy DLP52 outlines the measures taken to “safeguard and maximise the benefits of the Borough’s unique and internationally recognised geology”. The policy ensures that geodiversity assets and designated sites will be protected and enhanced by ensuring compliance to management plans, providing facilities that would manage and interpret geological resources, and encouraging the use of new data for geological recording. Therefore, the policy would be expected to have a minor positive impact on local geodiversity (SA Objective 3).

D.10.4.2 The policy references sites of particular concern that are biodiversity/geodiversity assets within the borough. The management, protection, and enhancement of these under the policy would be expected to positively impact the local character, where these assets contribute to the identity and landscape character of the area in which they are located. Therefore, the policy would be expected to have a minor positive impact on local landscape (SA Objective 2).

D.10.5 Policy DLP53 - Parks

Policy DLP53 - Parks

- 1) The Council will protect parks from inappropriate development that would jeopardise their existing and future role, function, and setting and is committed, in consultation with the local community, to maintain and, where possible, improve and upgrade them to a standard appropriate to their identified function.

The Leasowes - Historic Park:

Policy DLP53 - Parks

- 2) The Leasowes will continue to be restored and maintained as far as possible to the original design and setting, taking into account the needs for nature conservation. It is designated as Grade I on English Heritage’s Register of Parks and Gardens of Special Historic Interest in England which signifies that it is “of exceptional interest” (only 9% of 1600 Parks and Gardens on the Register are Grade I).

Community Parks

- 3) Community Parks (identified below) will be protected and appropriate works to improve their standard and amenity would be supported including their links to cycling and walking networks.

- 4) Community Parks for Dudley Borough are therefore listed below:

- Priory Park, Dudley - also recognised by English Heritage as a Grade II Registered Park and Garden
- Grange Park, Dudley
- Netherton Park
- Quarry Bank Park (Steven’s Park)
- Sedgley Hall Farm Park
- Silver Jubilee Park, Coseley
- King George V Park, Wordsley
- King George VI Park, Kingswinford
- Marsh Park and Lawyers Field Brierley Hill
- Mary Steven’s Park, Stourbridge
- Steven’s Park, Wollescote
- Green Park, Kates Hill
- Buffery Park, Dudley
- Woodside Park, Dudley
- Dudley Wood Recreation Ground
- Milking Bank, Open Space
- Clayton Park, Coseley
- Vale Street Recreation Ground, Gornal
- Abbey Street Recreation Ground, Gornal
- The Straits Open Space, Sedgley
- Wall Heath and Enville Road, Wall Heath
- The Dell Recreation Ground, Brierley Hill
- Wollaston Recreation Ground
- Amblecote Recreation Ground
- Huntingtree Park, Halesowen
- Hurst Green Park, Halesowen
- Highfield Park, Halesowen
- Homer Hill Park, Cradley

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP53	+	+	+	0	0	0	0	0	+	0	+	+	0	0

- D.10.5.1 Policy DLP53 aims to provide protection to the parks that are located within the borough and identifies one 'historic' and several 'community' parks that will be protected and enhanced.
- D.10.5.2 The policy states that there will be commitment to parks to *"maintain and, where possible, improve and upgrade them to a standard appropriate to their identified function"*. Parks provide open space to residents that can provide space for outdoor exercise, recreation and reflection. The policy identifies that parks will be supported by improving *"links to cycling and walking networks"* which can promote active travel and further facilitate healthier lifestyles. The parks will also form an important part of habitat networks and additionally can contribute to the surrounding landscape and sense of place, being an important feature of the landscape character. Community Parks may also provide shared spaces for events or social gatherings. Overall, the policy would be expected to have a minor positive impact on landscape, biodiversity, transport, equality and health (SA Objectives 2, 3, 9, 11 and 12).
- D.10.5.3 The policy also sets out the proposed restoration and maintenance of The Leasowes RPG as a 'Historic Park', with potential to achieve a minor positive impact on cultural heritage (SA Objective 1).

D.10.6 Policy DLP54 – River Stour and its Tributaries

Policy DLP54 – River Stour and its Tributaries

- 1) The Council will require all development proposals and other enhancement proposals, alongside or in close proximity to the River Stour and its tributaries to accord with the provisions of Policy DLP45 and through cross-boundary partnership working with neighbouring authorities, the Environment Agency and the Canals and Rivers Trust as appropriate.
- 2) The Council will also require works which;
 - a. enable the restoration of the natural riverbank habitat and, as appropriate, create new habitats, and remove invasive plant species from the riverside environment
 - b. enable the restoration of the in-channel habitat structure including the removal of culverts and improving the water quality of discharges into the watercourse
 - c. seek to retain, or create, an area of Green Infrastructure either side of the River Stour channel and its tributaries, of at least 10 metres in width from each riverbank top, unless this can be satisfactorily demonstrated to be unfeasible or unviable or it is in conflict with other Local Plan policies.
 - d. create a footway and cycleway of a combined width of 3.3 metres (minimum) within a landscaped setting along at least one side of the watercourse to link in with the wider network of paths and cycleways. Where these links are broken, new links shall be formed where possible, and the river bridges which support this network made structurally sound and legible as river crossings to enable connectivity within this network. In some instances, Dudley Council will seek to require the provision of new river bridges.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP54	0	+	+	0	+	0	+	0	+	0	0	+	0	0

- D.10.6.1 Policy DLP54 sets out measures to protect and enhance the River Stour and its tributaries.
- D.10.6.2 The policy states that works will be carried out to *"enable the restoration of the natural riverbank habitat and, as appropriate, create new habitats"* and *"enable the restoration of the in-channel habitat structure"*. The measures under the policy would be expected to have a minor positive impact on aquatic and riparian biodiversity (SA Objective 3).
- D.10.6.3 The policy states that works will be required to *"retain, or create, an area of Green Infrastructure either side of the River Stour channel and its tributaries"* which would be expected to enhance the surrounding landscape, provide benefits to water quality and reduce flood risk. Therefore, the policy would be expected to have a minor positive impact on landscape, climate change adaptation and pollution (SA Objectives 2, 5, and 7).
- D.10.6.4 Under the policy, development proposals would be encouraged to improve the network of pathways and cycleways associated with the River Stour, creating a *"footway and cycleway of a combined 3.3 metres (minimum) within a landscaped setting along at least one side of the watercourse"*. Works would also include improvements to river bridges to support this network, making these bridges more accessible and secure, introducing new bridges where necessary. Improving access to these modes of active travel and better-connected routes encourages healthy lifestyles and would be a more viable form of transport. Therefore, the policy would be expected to have a minor positive impact on transport and health (SA Objectives 9 and 12).
- D.10.6.5 The policy would benefit from stronger wording relating to development proposals and their distance to rivers, including what is meant by development proposals *"in close proximity to"* watercourses. An 8m minimum easement between built development and rivers should be ensured in line with Environment Agency guidance.

D.11 Historic Environment

D.11.1 Policy DLP55 – Historic Character and Local Distinctiveness of Dudley

Policy DLP55 - Historic Character and Local Distinctiveness of Dudley

- 1) All development proposals within Dudley should sustain and enhance the locally distinctive character of the area in which they are to be sited, including its historic character, whether formally recognised as a designated heritage asset or as or non-designated heritage asset. They should respect and respond to its positive attributes in order to help maintain the Dudley's cultural identity and strong sense of place.
- 2) Development proposals will be required to preserve and enhance local character and those aspects of the historic environment - together with their settings - that are recognised as being of special historic, archaeological, architectural, landscape or townscape quality.
- 3) Physical assets, whether man-made or natural that contribute positively to the local character and distinctiveness of Dudley's landscape and townscape should be retained and, wherever possible, enhanced and their settings respected.
- 4) The specific pattern of settlements (urban grain), local vernacular and other precedents that contribute to local character and distinctiveness should be used to inform the form, scale, appearance, details, and materials of new development.
- 5) New development in Dudley should be designed to make a positive contribution to local character and distinctiveness and demonstrate the steps that have been taken to achieve a locally responsive design. Proposals should therefore demonstrate that:
 - a. all aspects of the historic character and distinctiveness of the locality, including any contribution made by their setting, and (where applicable) views into, from, or within them, have been fully assessed and used to inform proposals; and
 - b. they have been prepared with full reference to the most up to date Historic Landscape Characterisation Studies, the Historic Environment Record (HER), and to other relevant historic landscape characterisation documents, supplementary planning documents (SPDs) and national and local design guides where applicable.
- 6) All proposals should aim to sustain and reinforce special character and conserve the historic aspects of locally distinctive areas of the borough, for example:
 - a. The network of now coalesced but nevertheless distinct small industrial settlements of the former South Staffordshire Coalfield, such as Netherton.
 - b. The civic, religious, and commercial cores of the principal settlements of medieval origin such as Dudley and Halesowen.
 - c. Surviving pre-industrial settlement centres of medieval origin such as Halesowen, and Kingswinford.
 - d. Rural landscapes and settlements including villages / hamlets of medieval origin, relic medieval and post-medieval landscape features (hedgerows, holloways, banks, ditches, field systems, ridge and furrow), post-medieval farmsteads and associated outbuildings, medieval and early post-medieval industry (mills etc.) and medieval and post-medieval woodland (see Policy DLP33). The undeveloped nature of these areas means there is also the potential for evidence of much earlier activity that has largely been lost in the urban areas.
 - e. Areas of Victorian and Edwardian higher-density development, which survive with a high degree of integrity including terraced housing and its associated amenities.

Policy DLP55 - Historic Character and Local Distinctiveness of Dudley

- f. Areas of extensive lower density suburban development of the mid-20th century including public housing and private developments of semi-detached and detached housing;
 - g. Public open spaces, including Victorian and Edwardian municipal parks, often created from earlier large rural estates or upon land retaining elements of relict industrial landscape features;
 - h. The canal network and its associated infrastructure, surviving canal-side pre-1939 buildings and structures together with archaeological evidence of the development of canal-side industries and former canal routes (see Policy DLP36);
 - i. Buildings, structures and archaeological remains of the traditional manufacturing and extractive industries of Dudley and the wider Black Country including glass making, metal trades, brick-making, coal mining and limestone quarrying;
 - j. Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark (see Policy DLP35);
 - k. The Beacons and other largely undeveloped high prominences lying along the Sedgley to Northfield Ridge (including Sedgley Beacon and Wrens Nest), Castle Hill and views to and from these locations.
- 7) In addition to designated heritage assets⁵², attention should be paid to the following non-designated heritage assets⁵³ including the Historic Environment Area Designations (HEADS) described and mapped in the most up to date Historic Landscape Characterisation Studies published by Dudley Council (see evidence section for links):
- a. Areas of High Historic Townscape Value (AHHTV) that exhibit a concentration of built heritage assets and other historic features that, in combination, make a particularly positive contribution to local character and distinctiveness.
 - b. Areas of High Historic Landscape Value (AHHLV) that demonstrate concentrations of important wider landscape elements of the historic environment, such as areas of open space, woodland, watercourses, hedgerows, and archaeological features, that contribute to local character and distinctiveness.
 - c. Designed Landscapes of High Historic Value (DLHHV) that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register for Parks and Gardens.
 - d. Archaeology Priority Areas (APA) that have a high potential for the survival of archaeological remains of regional or national importance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state of preservation of any remains to justify a designation.
 - e. Locally listed buildings / structures and archaeological sites.
 - f. Non-designated heritage assets of archaeological interest.

⁵² NPPF 2019 Annex 2 Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

⁵³ NPPF 2019 Annex 2 Heritage asset: A building monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Policy DLP55 - Historic Character and Local Distinctiveness of Dudley

- g. Any other buildings, monuments, sites, places, areas of landscapes identified as having a degree of significance⁵⁴.
- 8) Development proposals that would potentially have an impact on the significance of any of the above distinctive elements, including any contribution made by their setting, should be supported by evidence that the historic character and distinctiveness of the locality has been fully assessed and used to inform proposals. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance. Clear and convincing justification should be provided, either in Design and Access Statements, Statements of Heritage Significance, or other appropriate reports.
- 9) In some instances, the local planning authority will require developers to provide in support of their detailed Heritage Statements and / or Archaeological Desk-based Assessments that have been prepared by suitably qualified persons with the appropriate level of expertise.
- 10) For sites with archaeological potential, local authorities may also require developers to undertake Field Evaluation to support proposals.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP55	++	++	+	0	0	0	0	0	0	0	0	0	+	0

D.11.1.1 Policy DLP55 would be expected to ensure that the historic character and heritage assets which contribute to local distinctiveness are protected throughout the borough and that development proposals should *"enhance the locally distinctive character of the area in which they are to be sited, whether formally recognised as a designated or non-designated heritage asset"*. The policy identifies the importance of non-designated assets within the borough, including those identified from the 2019 Black Country Historic Landscape Characterisation Study and the Historic Environment Record. The policy states that heritage assets within the borough *"should be retained and, wherever possible, enhanced and their settings respected"*. Overall, the policy would be expected to have a major positive impact on cultural heritage (SA Objective 1).

D.11.1.2 The policy states that *"new development in Dudley should be designed to make a positive contribution to local character"* and seeks to ensure that the design and appearance of new development is informed by *"the specific pattern of settlements (urban grain), local vernacular and other precedents that contribute to local character and distinctiveness"*. Heritage assets within the borough often contribute to the local landscape character and sense of place, and through the protection and enhancement of these assets as well as consideration of wider impacts including views and architecture, a major positive impact would be expected on landscape (SA Objective 2).

⁵⁴ NPPF Annex 2 Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

D.11.1.3 Through ensuring the conservation and enhancement of heritage assets including the canal network and open spaces, as well as the UNESCO Black Country Geopark, the policy could also have a minor positive impact on local biodiversity and geodiversity (SA Objective 3).

D.11.1.4 Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment⁵⁵. The policy could potentially result in a minor positive impact on the economy (SA Objective 13).

D.11.2 Policy DLP56 – Conservation Areas

Policy DLP56 - Conservation Areas

- 1) The Council will seek to safeguard and enhance the Conservation Areas of the borough ensuring that proposals will better reveal their significance as designated heritage assets. Proposals for the inappropriate demolition or inappropriate alteration or extension of buildings in Conservation Areas; or proposals for works which would be detrimental to their character or setting; and proposals which could prejudice views into or out of Conservation Areas will be resisted.
- 2) The Council will require the use of building materials appropriate to the Conservation Area in all new development. Any new development or alterations should respect the historical or vernacular building character, proportion, massing and relationship between buildings and the spaces between them and with their setting.
- 3) Where planning permission is granted for the demolition of structures of historic interest in Conservation Areas, the Council will seek to ensure that provision is made for an appropriate level of archaeological buildings recording to take place prior to demolition.
- 4) To prevent gap sites, consent for demolition will, where appropriate, be subject to a condition providing that demolition shall not take place until a contract for carrying out redevelopment works is in place and planning permission for those works has been granted in line with the requirements of legislation, the NPPF and the Dudley Local Plan.
- 5) The Council will continue to undertake a review of Conservation Areas throughout the Borough and where appropriate will amend or create new Conservation Areas where appropriate in accordance with guidance provided by Historic England.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP56	+	+	+	0	0	0	0	0	0	0	0	0	0	0

D.11.2.1 Policy DLP56 ensures that the borough’s conservation areas are safeguarded and enhanced, through *“ensuring that proposals will better reveal their significance as designated heritage assets”*. Proposals will be resisted where they are found to be

⁵⁵ Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date accessed: 02/08/23]

"detrimental to their character or setting". The protection of conservation areas would also help to protect local biodiversity that relies on the habitat provision within conservation areas, for example the canal network within Dudley. The protection and enhancement of conservation areas would be expected to positively contribute towards the local landscape character. Overall, the policy would be expected to have a minor positive impact on cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).

D.11.3 Policy DLP57 – Listed Buildings

Policy DLP57 - Listed Buildings	
1)	The Council will protect, conserve and encourage the appropriate enhancement of buildings statutorily listed as being of historic or architectural value. Applicants proposing the alteration, extension or change of use of a statutorily Listed Building will be required to provide sufficient information to demonstrate how the proposals would contribute to the building’s conservation, whilst preserving or enhancing its architectural or historic interest.
2)	Where such proposals would affect a listed structure which has a particularly complex building history and would involve a major impact on the historic plan form or significant loss of historic fabric, applicants may be required to commission a professional archaeological pre-determination assessment. This should include an appropriate level of archaeological buildings recording, an analysis sufficient to demonstrate the significance of the existing plan form and historic fabric to be affected, be to an agreed timescale and clarify the degree of impact which the proposals would have upon the building’s historic character and appearance.
3)	Proposals for demolition, inappropriate alteration of or addition to statutorily Listed Buildings, or for development which would harm their significance or be detrimental to their setting, will be resisted. Where Listed Building Consent is granted for demolition or alteration resulting in the loss of historic fabric, the Council will ensure that provision is made for an appropriate level of archaeological buildings recording to take place prior to the commencement of the approved works.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP57	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.11.3.1 Policy DLP57 would help to ensure that Listed Buildings within the borough are protected and enhanced, stating that *"the council will protect, conserve and encourage appropriate enhancement of buildings statutorily listed as being historic or architectural value"*. Furthermore, the policy includes measures that protect Listed Buildings from proposals that may result in *"major impact on the historic plan form or significant loss of historic fabric"* and could be subject to an archaeological pre-determination assessment. The conservation and enhancement of Listed Buildings and their settings would be expected to positively impact the local landscape. Overall, the policy would be likely to have a minor positive impact on heritage assets (SA Objective 1) and a minor positive impact on the local landscape (SA Objective 2).

D.11.4 Policy DLP58 – Buildings or Structures of Local Historic and/or Architectural Importance

Policy DLP58 - Buildings or Structures of Local Historic and/or Architectural Importance

- 1) Development proposals which contain positive measures to conserve and enhance buildings on the Local List will be supported.
- 2) The Council will resist development which will involve;
 - a. inappropriate demolition or part demolition of buildings or structures on the Local List
 - b. inappropriate alteration or extension to buildings or structures on the Local List and
 - c. have a detrimental impact on the setting or context of buildings or structures on the Local List including development which conflicts with the intrinsic historic value of the building and its setting and the local character of the wider area. Proposals for the change of use of a building or structure on the Local List will be required to demonstrate how this would contribute to its conservation whilst preserving or enhancing its architectural or historic interest and conserving and enhancing its significance.
- 3) Applications proposing demolition will be required to demonstrate that the viability of continued beneficial use restoration or conversion has been fully investigated and that there are no reasonable alternatives. In cases where demolition is unavoidable the Council will seek to ensure that provision is made for an appropriate level of archaeological buildings recording to take place prior to demolition.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP58	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.11.4.1 Policy DLP58 would be expected to ensure that locally designated heritage assets are protected throughout the borough and that proposals should “*contain positive measures to conserve and enhance buildings on the Local List*”. This policy would help ensure that buildings and structures of historic importance are conserved in a manner appropriate to their significance. Overall, a minor positive impact on cultural heritage would be likely (SA Objective 1).

D.11.4.2 Dudley’s historic buildings and architectural features contribute to the local landscape and townscape character and sense of place. Furthermore, this policy enforces that where change of building use or structure is desired, it must be demonstrated “*how this would contribute to its conservation whilst preserving or enhancing*” its significance. Through protection and enhancement of these assets, it would be expected that the policy would have a minor positive impact on the local landscape (SA Objective 2).

D.11.5 Policy DLP59 – Areas of High Historic Townscape Value (AHHTV)

Policy DLP59 - Areas of High Historic Townscape Value (AHHTV)

- 1) New development proposals within an AHHTV, as defined by Dudley's Historic Landscape Characterisation Survey (HLCS), must consolidate or enhance the existing positive characteristics of the locality, including the public realm, in order to create complementary good quality design. Views into, out of and within the AHHTV must be respected.
- 2) Heritage Statements and Design and Access Statements accompanying planning applications in AHHTV's must be prepared with full reference to the Borough-wide Historic Landscape Characterisation Study (HLCS) in order to produce a locally responsive high-quality design that, wherever appropriate, conserves and enhances significant heritage assets together with their settings.
- 3) Proposals will not be permitted if they fail to respond adequately to the character and context of an AHHTV or prejudice significant views into, out of or within an AHHTV as identified within the HCS.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP59	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.11.5.1 Areas of High Historic Townscape Value (AHHTV) are defined as areas where built heritage makes a significant contribution to local character and distinctiveness⁵⁶.

D.11.5.2 Policy DLP59 sets out requirements for development within AHHTV as defined in the HLC, to aid the conservation of features of architectural or historic interest and where necessary, encourage their enhancement. Furthermore, this policy suggests new development proposals “*must consolidate or enhance the existing positive characteristics of the locality*”. Through protection and enhancement of these assets, it would be expected that the policy would have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

D.11.5.3 The Council could consider merging Policies DLP59 and DLP60 to cover the requirements for development affecting AHHTVs or AHHLVs, given the similarities between these designations.

D.11.6 Policy DLP60 – Areas of High Historic landscape Value (AHHLV)

Policy DLP60 - Areas of High Historic Landscape Value (AHHLV)

- 1) Within Areas of High Historic Landscape Value, the Council will resist any development or other works taking place which would be detrimental to the character, quality and historic integrity of the landscape.
- 2) The Council will seek to protect and enhance views into, from or within Areas of High Historic Landscape Value. Approval will not be given where such views would be unduly interrupted or harmed, or where the opportunity to enhance such a view would be lost.

⁵⁶ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date Accessed: 17/08/23]

Policy DLP60 - Areas of High Historic Landscape Value (AHHLV)

- 3) Heritage Statements and Design and Access Statements accompanying planning applications in or adjacent to an AHHLV, must be prepared with full reference to the Borough-wide Historic Landscape Characterisation Study (HLCS). The Design and Access Statement must clearly evidence how the proposal has taken account of the HLCS in order to produce a locally responsive high-quality design that, wherever appropriate, conserves and enhances significant landscape heritage assets together with their settings.
- 4) Proposals which fail to respond adequately to their historic landscape context or that would prejudice views into, out of or within an AHHLV will not be permitted.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP60	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.11.6.1 Areas of High Historic Landscape Value (AHHLV) are designations which recognise the quality of the wider landscape and their relative values, including natural and historic features⁵⁷.

D.11.6.2 Policy DLP60 sets out requirements for development within AHHLV as defined in the HLC, to aid the conservation of features of historic interest and where necessary, encourage their enhancement. Furthermore, this policy states that the Council “*will resist any development or other works taking place which would be detrimental to the character, quality and historic integrity of the landscape*”. Through protection and enhancement of these assets, it would be expected that the policy would have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

D.11.6.3 The Council could consider merging Policies DLP59 and DLP60 to cover the requirements for development affecting AHHTVs or AHHLVs, given the similarities between these designations.

D.11.7 Policy DLP61 – Registered Parks and Gardens and Designed Landscapes of High Historic Value (DLHHV)

Policy DLP61 - Registered Parks and Gardens and Designed Landscapes of High Historic Value (DLHHV)

- 1) The Council will resist any development or other works taking place which would harm the significance or be detrimental to the setting, character, quality and historic integrity of Registered Parks and Gardens at Leasowes Park and Priory Park and Designed Landscapes of High Historic Value including detailed design features and individual historic components, whether man-made or natural.
- 2) The Registered Parks and Gardens at the Leasowes and Priory Park will be preserved and enhanced wherever possible in order to enhance and maintain their unique features and their significance.

⁵⁷ Ibid

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP61	+	+	+	0	0	0	0	0	0	0	0	0	0	0

D.11.7.1 Policy DLP61 ensures the protection of Dudley’s Registered Parks and Gardens (RPGs) and Designed Landscapes of High Historic Value (DLHHVs). DLHHVs are landscape areas that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register for Parks and Gardens⁵⁸.

D.11.7.2 The policy states that it will resist development that would be detrimental to these assets and further states that such assets will be *“preserved and enhanced wherever possible in order to enhance and maintain their unique features and their significance”*. The policy would be expected to have a minor positive impact on heritage assets and the local landscape (SA Objectives 1 and 2).

D.11.7.3 Furthermore, the enhancement and protection of RPGs could potentially provide biodiversity benefits, where habitats and corridors within these designations would be safeguarded and enhanced. Therefore, a minor positive impact on local biodiversity could be expected (SA Objective 3).

D.11.8 Policy DLP62 – Heritage Assets of archaeological interest, Scheduled Monuments and Archaeological Priority Areas (APA)

Policy DLP62 - Heritage Assets of archaeological interest, Scheduled Monuments and Archaeological Priority Areas (APA)
1) For development proposals which; <ol style="list-style-type: none"> a. contain a Heritage Asset of archaeological interest b. are within an Archaeological Priority Area c. are in proximity to a Scheduled Monument d. are within any other sites and areas of known or potential archaeological significance that may be identified and included in the Dudley Council Historic Environment Record (HER) through the life of the plan and or identified in the Borough-wide Historic Characterisation Survey (HCS), 2) The following will apply; <ol style="list-style-type: none"> a. a presumption against any development which would threaten the integrity or prejudice the setting of Scheduled Monuments and non-scheduled sites of national importance. b. the Council will seek to ensure that archaeological remains of interest are preserved in situ and encourage landowners to enter into management agreements in this regard. Where this would be unreasonable, to ensure that provision is made for an appropriate level of archaeological investigation and recording of any buildings structure or buried deposit of interest prior to the

⁵⁸ Ibid

Policy DLP62 - Heritage Assets of archaeological interest, Scheduled Monuments and Archaeological Priority Areas (APA)

commencement of development or, in some cases, prior to the determination of a planning application.

- c. as part of any planning application, applicants are required to provide adequate information to allow the full and proper consideration of the impact of the proposed development on archaeological remains through desk top archaeological appraisal and, as Dudley Council deems appropriate, subsequent physical site evaluation and building recording.
- d. any development proposal that is deemed to have a damaging impact upon significant archaeological remains, and where potentially negative impacts have been identified, is required to carry out an agreed schedule of suitable measures designed to mitigate such impact in order to preserve buildings, structures or buried deposits in situ.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP62	+	+	0	0	0	0	0	0	0	0	0	0	0	0

D.11.8.1 Policy DLP62 would be expected to ensure archaeological and heritage assets are protected throughout the borough, including designated Scheduled Monuments (SMs), and Archaeological Priority Areas (APAs) as identified within the HLC. APAs are likely to have high archaeological and historic interest but are not designated as SMs. This policy would be expected to help ensure that heritage assets are conserved in a manner appropriate to their significance and that any archaeological discoveries are conserved appropriately. Overall, a minor positive impact on cultural heritage would be likely (SA Objective 1).

D.11.8.2 Dudley’s heritage assets contribute to the local landscape and townscape character. Through protection and enhancement of these assets, it would be expected that the policy would have a minor positive impact on the local landscape (SA Objective 2).

D.12 Recreation and Community uses

D.12.1 Policy DLP63 – Public Open Space within New Large Housing Developments

Policy DLP63 – Public Open Space within New Large Housing Developments

- 1) Development proposals of 80 residential dwellings or more will be required to provide new on-site recreational amenity green space if the site is isolated from and poorly served by existing nearby publicly accessible open space areas within a 1-kilometre straight line distance.
- 2) Where new recreational green space provision is being provided on-site, developers will be expected to provide for its future maintenance in accordance with standards set out in the Council’s latest Planning Obligations SPD.
- 3) If it can be demonstrated that it is not practical or viable to provide new on-site informal recreational green space, then a financial contribution will be required towards new or improving nearby off-site public open space areas or play equipment which are well linked by means of cycling and walking in accordance with standards set out in the Council’s latest Planning Obligations SPD.
- 4) New on-site recreational green space should be provided to the following quantity standard: At least 0.81 hectares of amenity green space per 1,000 population.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP63	0	+	+	0	0	0	0	0	0	0	+	+	0	0

D.12.1.1 Policy DLP63 sets out the requirements of large-scale residential development proposals to provide green space, either on site, or off site if the provision is not practical or viable. The policy would help to ensure that new residents of such sites have good access to outdoor space for recreation and exercise, with associated benefits for mental and physical health. Open space can also provide shared spaces for community events and facilitate social cohesion. A minor positive impact on equality and health and wellbeing would be likely (SA Objectives 11 and 12).

D.12.1.2 Provision of new green spaces can provide multi-functional benefits including allowing space for nature amongst built development and contribute towards improved landscape quality and character. Therefore, the policy could potentially result in a minor positive impact on landscape and biodiversity (SA Objectives 2 and 3).

D.12.1.3 The Council could consider setting out quantitative and qualitative requirements for informal or natural green space in new developments, for example, using Natural England’s Accessible Natural Greenspace Standard⁵⁹.

D.12.2 Policy DLP64 – Children’s Play Areas

Policy DLP64 – Children’s Play Areas

- 1) Children’s play areas will be retained and, where necessary, improved.
- 2) Where a development proposal results in the loss of existing children’s play space, or results in an increased deficiency in the availability of such play space, then planning permission will only be granted if a replacement facility of equivalent or better quantity and quality is provided. Such a replacement facility should be in an agreed suitable location well linked by means of cycling and walking and operational before the new development is occupied.
- 3) In residential development proposals over the 80 units threshold, equipped children’s play areas will be explored within the on-site recreational green space area in consultation with the Council to assess the type of play equipment needed to meet need. Guidance in the Council’s latest Open Space, Sport and Recreation Provision SPD will be considered in the suitability and type of any new play area.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP64	0	0	0	0	0	0	0	0	0	0	+	+	0	0

D.12.2.1 Policy DLP64 outlines the requirements of development proposals to retain and where necessary enhance children’s play areas.

D.12.2.2 The policy states that proposals that remove children’s play areas will only be granted where they can provide a facility of better or equivalent quality. Policy DLP64 identifies that any replacement facility should be in a “*suitable location well linked by means of cycling and walking*”. The provision of these areas would positively impact the health of local children by improving access to play areas and allowing them to pursue outdoor activities and encourage healthier lifestyles, additionally encouraging active travel choices. Opportunities for community cohesion would also be improved. The policy would be expected to have a minor positive impact on equality and health (SA Objectives 11 and 12).

⁵⁹ Natural England (2003) Accessible Natural Green Space Standards in Towns and Cities. Available at: <http://publications.naturalengland.org.uk/publication/65021> [Date accessed: 17/08/23]

D.12.3 Policy DLP65 – Allotments and Community Gardens

Policy DLP65 – Allotments and Community Gardens

- 1) The redevelopment of allotment sites for other uses will not be allowed if a substantial part of the site is in use; or there is proven demand for allotments in the area.
- 2) Redevelopment of an allotment site will only be allowed if alternative allotment provision of the same or better quality and quantity is provided in the locality before the use of the existing allotment ceases.
- 3) Planning permission will not be granted simply because an allotment site has been allowed to fall out of use and become derelict.
- 4) Proposals for the provision of new allotment sites will be permitted provided that they;
 - a. are accessible by a variety of transport means, including walking and cycling as well as adequate parking
 - b. do not result in the loss of, or harm to a high quality nature conservation site
 - c. do not harm the visual amenity, landscape setting and appearance of the area
 - d. do not result in the loss of an area of importance and value for informal or formal recreation
 - e. do not detrimentally harm the amenity of adjacent residents and/or highway safety
 - f. safeguard and enhance any biodiversity features where possible to help support wildlife.
- 5) On all allotment sites, the Council will encourage sustainable methods of power, the storage and re-use of water and on-site composting where appropriate.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP65	0	0	+	0	0	0	0	0	0	0	+	+	0	0

- D.12.3.1 Policy DLP65 sets out measures to protect allotments within the borough and additionally ensure that the provision of new allotments meet certain standards.
- D.12.3.2 The policy states that allotments will be permitted providing that they *"safeguard and enhance any biodiversity features where possible to help support wildlife"*. The provision of allotment sites would be expected to increase habitat connectivity. The policy would therefore be expected to have a minor positive impact on biodiversity (SA Objective 3).
- D.12.3.3 The provision of allotments would also provide health benefits to local residents, providing open spaces that can also facilitate community engagement and social cohesion. The policy additionally states that the provision of allotments should be *"accessible by a variety of transport means, including walking and cycling as well as adequate parking"*. The policy would be expected to have a minor positive impact on social cohesion and the health and wellbeing of residents (SA Objectives 11 and 12).
- D.12.3.4 Policy DLP65 states that allotments should *"not harm the visual amenity, landscape setting and appearance of the area"* and would therefore be expected to have a negligible impact on the local landscape (SA Objective 2).

D.12.4 Policy DLP66 – Burial Land including Cemeteries and Crematoriums

Policy DLP66 – Burial Land including Cemeteries and Crematoriums

- 1) Wherever possible the safeguarding and extension of existing burial grounds, including churchyards and cemeteries should be given preference. Where these are full, additional sites in the vicinity should be considered favourably providing they do not;
 - a. adversely harm the amenity of adjacent residential areas
 - b. result in the loss of an area of importance and value for informal or formal recreation.
 - c. result in the loss of agricultural land.
 - d. result in the loss of or harm a high-quality nature conservation site.
- 2) New proposals for cemeteries and crematoriums need to have consideration for the following;
 - a. must be located in accessible locations well-served by a range of transport modes including walking and cycling and be close to existing settlements to minimise travel distances.
 - b. must have adequate parking facilities.
 - c. need to consider the needs of different faiths
 - d. where feasible, retain and include existing landscape, nature conservation and biodiversity features within their design.
 - e. if appropriate, make use of existing buildings and infrastructure.
 - f. take account of the latest Environment Agency Guidance on groundwater protection (GP3 or latest equivalent).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP66	0	+	0	0	0	0	0	0	0	0	+	0	0	0

D.12.4.1 Policy DLP66 sets out the requirements for the development or extension of cemeteries and crematoriums. The policy states that new proposals should "*retain and include existing landscape, nature conservation and biodiversity features within their design*". The policy could potentially have a minor positive impact on the local landscape (SA Objective 2), and would avoid harm to biodiversity.

D.12.4.2 New proposals would need to consider the various faiths within the borough, that is home to various religions that includes a predominant Christian population and various other religions including Muslim, Sikh and Hindu⁶⁰. Providing burial land to accommodate the

⁶⁰ Dudley Metropolitan Borough Council. 2021 Census results. Available at: <https://www.dudley.gov.uk/council-community/your-council/census/#:~:text=49.3%25%20of%20the%20Dudley%20population,said%20they%20had%20no%20religion>. [Date accessed: 14/07/23]

various religions would ensure equal access to burial services and the measures within the policy would provide a minor positive impact on equality (SA Objective 11).

D.13 Transport

D.13.1 Policy DLP67 – The Transport Network

Policy DLP67 – The Transport Network

- 1) The Council will undertake a programme of major and minor works to the transport network, as circumstances require and resources allow, in order to further integrate and improve:
 - a. public transport
 - b. traffic management
 - c. Active Travel schemes
 - d. road safety
 - e. access to enable the regeneration of specific sites and areas.
 - f. micro-mobility
 - g. car share schemes
- 2) Land needed for the implementation of priority transport projects will be safeguarded to allow for their future delivery. All new developments must provide adequate access for all modes of travel, including walking, cycling and public transport. Residential development will be expected to meet the accessibility standards set out in Policy DLP11 of this plan. Key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements, traffic management (including localised junction improvements) and road safety, and road space reallocation where appropriate.
- 3) Priority Transport Schemes identified for delivery during the lifetime of the Dudley Local Plan within the Borough, but also with consideration given to the impact of development on, and connections into, priority schemes located within the regional strategic transport network, are:
 - a. Within Dudley Borough
 - **Rapid Transit**
 - Wednesbury – Brierley Hill
 - Walsall – Stourbridge corridor tram-train extensions
 - **Key Road Corridors**
 - A4123 Corridor
 - A461 Corridor
 - A456 Corridor
 - A458 Corridor (Lye)
 - **Interchanges**
 - Dudley Town Centre Interchange
 - b. Within the regional strategic transport network
 - **Motorways**
 - M6 Junction 10
 - M5 Improvements (Junctions 1 and 2, including Birchley island)
 - M54 - M6 / M6 (Toll) Link Road

Policy DLP67 – The Transport Network

- **Rail**
- Wolverhampton - Walsall – Willenhall – Aldridge Rail Link
- Midlands Rail Hub (HS2)
- Wolverhampton – Shrewsbury Line Improvements
- **Rapid Transit:**
- A34 Walsall Road Sprint Corridor
- Wolverhampton – New Cross Hospital
- Cross-city bus packages
- Sprint routes or equivalent
- **Key Road Corridors**
- A454 Corridor
- A449 Corridor
- **Interchanges:**
- Dudley Port Integrated Transport Hub
- Walsall Interchange
- **Active Travel**
- Sustrans Link 54 (Stourbridge-Brierley Hill-Dudley)
- Sustrans Link 81 (Dudley/Coseley)

4) Land required for the implementation of Priority Transport Schemes will be safeguarded to allow for their future delivery.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP67	0	0	0	+	0	0	+	0	++	0	+	+	0	0

D.13.1.1 Policy DLP67 outlines the priorities for the Dudley’s transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail, rapid transit and interchanges. The transport projects identified within this policy would all be expected to contribute towards improving the delivery of sustainable transport options, improving the integration of different modes of transport, reducing issues with congestion and improving traffic flows. Overall, a major positive impact on transport would be expected (SA Objective 9).

D.13.1.2 The policy states that “*all new developments must provide adequate access for all modes of travel, including walking, cycling and public transport*” in accordance with the identified accessibility standards. The promotion of active travel and public transport improvements within key transport corridors would be likely to encourage the uptake of sustainable

transport and could potentially help to reduce reliance on travel via car. A modal shift away from private car use towards public transport and active travel would be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy DLP67 could potentially result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

D.13.1.3 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, the policy could potentially improve the physical and mental wellbeing of residents. Ensuring that road safety and pedestrian access are considered when designing new development would be likely to encourage more people to choose these forms of travel, encouraging physical exercise and social interaction. A minor positive impact on equality and health would be anticipated (SA Objectives 11 and 12).

D.13.2 Policy DLP68 – The Key Route Network

Policy DLP68 – The Key Route Network														
1) Dudley Council, in conjunction with other regional, strategic Highway Authorities as appropriate and Transport for West Midlands (TfWM), will identify capital improvements and management strategies to ensure the Key Route Network (KRN) meets its designated function of serving the main strategic demand flows of people and freight across Dudley Borough and the wider metropolitan area, providing connections to the national strategic road network, serving large local flows that use main roads and providing good access for businesses reliant on road-based transport.														
2) Land needed for the implementation of improvements to the KRN will be safeguarded in order to assist in their future delivery.														
3) Where new development is expected to result in adverse impacts on the KRN, appropriate mitigation measures will need to be identified through Transport Assessments and provided through Planning Obligations and/or Planning Conditions.														

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP68	0	0	0	0	0	0	0	0	+	0	0	0	0	0

D.13.2.1 New development within the borough as proposed within the DLP would be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. Without careful planning, an increased volume of traffic on the road can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. Policy DLP68 seeks to ensure that the Key Route Network (KRN) is effectively managed in order to support the level of growth proposed in the DLP over the Plan period.

D.13.2.2 The policy states that suitable mitigation measures will be identified and put in place, to ensure that any potential adverse impacts on the road network would be avoided. Furthermore, the policy would help to ensure that transport connectivity is improved, through liaison between DMBC and Transport for West Midlands (TfWM). Policy DLP68 could potentially encourage coordination and streamlining of transport systems including public transport such as rapid transit and bus routes. Overall, a minor positive impact on transport would be anticipated (SA Objective 9).

D.13.3 Policy DLP69 – Transport Impacts of New Development

Policy DLP69 – Transport Impacts of New Development

- 1) Planning permission will not be granted for any proposals that are likely to have a significant adverse impact on the transport network, in terms of capacity, congestion and/or highway safety, unless accompanied by mitigation schemes that can demonstrate that an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development. Mitigation schemes must address, in particular, access by wheeling, walking, cycling, public transport and car sharing.
- 2) The Council will require a Transport Assessment (that has been scoped and developed in consultation with the Council) to be submitted for major developments, in order to assess the level of impact on the transport network and provide improvements that integrate all modes into proposed solutions as required. Transport Assessments shall also include an assessment of their impact on future transport schemes, where applicable. Development proposals should also have full regard to local plan guidance and/or other council policies on parking standards, air quality and carbon management, and where appropriate the Council will seek a Travel Plan to be implemented for the users of the development.
- 3) The Council will require that all new development;
 - a. is appropriate in scale to the existing transportation infrastructure of the immediate area and transport corridor or includes measures to overcome any deficiencies.
 - b. actively promotes pedestrian and cycle movement, whilst ensuring safe egress access for all highway users (including the provision of appropriate parking to reduce on-road parking).
 - c. addresses the needs of people with disabilities and reduced mobility in relation to all modes of transport (see also Policy DLP83).
 - d. makes adequate provision for the loading and unloading of commercial vehicles where appropriate.
 - e. provides links to the public transport system, and local walking and cycling networks.
 - f. makes adequate provision for the managing of delivery operations, and the servicing of new properties and businesses (including emergency vehicles).
 - g. incorporates safe, direct and user-friendly transport links within the layout of the site, as well as active travel storage.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education

DLP69	0	0	0	+	0	0	0	0	+	0	0	0	0	0
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- D.13.3.1 Policy DLP69 states that planning permission will be refused on proposals that are likely to adversely impact the transport network in relation to “*capacity, congestion and/or highway safety*”. Major development proposals would require a Transport Assessment to assess the impacts on the transport network. The policy would help to ensure that congestion and associated traffic emissions are reduced by preventing constraints on the transport network.
- D.13.3.2 Policy DLP69 also includes measures that encourage active travel, ensuring development proposals incorporate accessibility for cyclists and pedestrians and additionally providing links to the public transport system.
- D.13.3.3 Overall, the policy would be expected to have a minor positive impact on climate change mitigation and the transport network within the borough (SA Objectives 4 and 9).

D.13.4 Policy DLP70 – The Movement of Freight

Policy DLP70 – The Movement of Freight														
1) The movement of freight by sustainable modes of transport such as rail and waterways will be encouraged. Road-based freight will be encouraged to use the Key Route Network whenever practicable.														
2) Junction improvements and routeing strategies will be focussed on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network.														
3) Proposals that generate significant freight movements will be directed to sites with satisfactory access to the Key Route Network.														
4) Existing and disused railway lines will be safeguarded for transport or movement related uses where appropriate.														
5) Sites with existing and potential access to the rail network for freight will be safeguarded for rail-related uses.														

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP70	0	0	-	0	0	0	0	0	+	0	0	0	+	0

- D.13.4.1 Policy DLP70 sets out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport where possible. Road transport is a major source of air pollution and GHG emissions in the UK⁶¹. Transporting freight via rail and waterways

⁶¹ ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date Accessed: 29/06/23]

would be expected to result in lower emissions and higher energy efficiency compared to road transport using heavy goods vehicles (HGVs)⁶².

- D.13.4.2 By encouraging the movement of freight via rail and waterways, Policy DLP70 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport would be expected (SA Objective 9).
- D.13.4.3 Furthermore, this policy could potentially result in more cost-effective and efficient movement of freight, which would help to improve economic productivity. As such, this policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- D.13.4.4 The policy states that “*existing and disused railway lines will be safeguarded for rail-related uses*” and seeks to encourage the use of waterways for freight transport. Within Dudley, canals, and disused railways lines form part of the ecological network in an otherwise heavily urbanised area, for example the ‘Stourbridge Canal’ Site of Local Importance for Nature Conservation (SLINC) and the ‘Dudley to Priestfield Disused Railway’ SLINC. Disturbance of important wildlife corridors from the conversion of routes back into regular use for freight transport could potentially result in a minor negative impact on biodiversity (SA Objective 3).

D.13.5 Policy DLP71 – Active Travel

Policy DLP71 – Active Travel

- 1) Joint working between Dudley Council, neighbouring authorities, Canal and River Trust and other regional strategic Highway Authorities and Active Travel England will ensure that a comprehensive, integrated, attractive and well-designed cycle and footpath network is created, improved and maintained to serve the West Midlands region, which the existing and proposed networks within Dudley Borough can connect to and integrate in with.
- 2) New development will link to existing walking and cycling networks, through safe and direct pathways, not impeded by infrastructure provided for other forms of transport, unless there is robust evidence provided as to why this is not viable and/or practical.
- 3) Cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance, with the number of cycle parking spaces required in new developments and in public realm schemes determined by local planning guidance. The design of cycle infrastructure should be in accordance with the principles and standards contained in the West Midlands Cycle Design Guidance (TfWM 2021), Local Transport Note 1/20 or superseding guidance.
- 4) The following networks and other linkages within Dudley Borough are considered priorities for potential enhancement and expansion as cycle routes and strategic footpaths, including their signposting and delineation, and their environment upgraded with an emphasis on enhanced green infrastructure:
 - a. Sustrans Link 54 (Stourport-Brierley Hill-Dudley).
 - b. Sustrans Link 81 (Dudley/Coseley).

⁶² Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date Accessed: 29/06/23]

Policy DLP71 – Active Travel

- c. The canal network.
- d. The River Stour (Stour Valley) active travel network.
- e. The Geo-Park/Geo-Trail active travel network.
- f. Disused railway lines, for example: Smestow Valley active travel network.
- g. The 9 Mile Walking Route from Norton Covert, Stourbridge, to The Leasowes, Halesowen.
- h. Monarch’s Way.
- i. Links to existing centres.
- j. National and regionally recognised footpaths.
- k. Links to public transport nodes, stops and interchanges.
- l. Within accessible neighbourhoods, to readily access local services and facilities.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP71	0	0	0	+	0	0	+	0	++	0	+	+	0	0

D.13.5.1 Policy DLP71 seeks to ensure that walking and cycling infrastructure networks are developed and maintained across the borough to encourage sustainable travel choices.

D.13.5.2 The policy requires the development of cycle and walking links which are “safe, direct and not impeded by infrastructure provided for other forms of transport” and states that “cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance”. These factors would be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on private car use. Therefore, a major positive impact on transport would be expected (SA Objective 9). This would also be expected to contribute towards a reduction in GHG emissions and other air pollutants, and as such, positive impacts have been identified for climate change mitigation and pollution (SA Objectives 4 and 7).

D.13.5.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health would be likely (SA Objective 12).

D.13.5.4 Policy DLP71 seeks to ensure that walking and cycling networks are safe, and bicycle storage is in “convenient locations with good natural surveillance”, which could help to reduce crime and the fear of crime. Through ensuring active travel links are well designed and integrated, this could also help to make walking and cycling more accessible. Therefore, this could potentially result in a minor positive impact on equality (SA Objective 11).

D.13.6 Policy DLP72 – Demand for Travel and Travel Choices

Policy DLP72 – Demand for Travel and Travel Choices

- 1) The Council is committed to considering all aspects of traffic management in the centres and wider area. The priorities for traffic management in the wider West Midlands region are:
- a. identifying appropriate strategic and local Park and Ride sites on current public transport routes to ease traffic flows into centres.
 - b. working together with the rest of the region to manage region-wide traffic flows through the West Midlands Metropolitan Area Urban Traffic Control (UTC) scheme and further joint working.
 - c. promoting and implementing Smarter Choices measures that will help to reduce the need to travel and facilitate a shift towards using sustainable modes of transport (walking, cycling, public transport, car sharing).
 - d. supporting the emerging Carbon Management Plan.
 - e. the use of innovation to promote behaviour change in the deployment of policy related interventions.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP72	0	0	0	+	0	0	+	0	+	0	0	0	0	0

D.13.6.1 Policy DLP72 promotes the holistic management of traffic across Dudley and seeks to encourage a modal shift towards more sustainable travel options, in accordance with the wider regional priorities for the West Midlands.

D.13.6.2 Through requiring the DLP to identify “*appropriate strategic and local Park and Ride sites*” and to work together with neighbouring authorities, this policy would be expected to encourage the development of better-connected public transport systems and deliver more widespread changes to the transport network. The promotion of public transport and development of additional strategic and local sites for delivery would be likely to reduce reliance on private car use and consequently reduce the emission of GHGs and other air pollutants; the policy also sets out the need to support the emerging Carbon Management Plan.

D.13.6.3 Overall, a minor positive impact would be expected in relation to climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).

D.13.7 Policy DLP73 – Parking Management

Policy DLP73 – Parking Management

- 1) The priorities for traffic management in the Dudley Borough include the sustainable delivery and management of parking in centres and beyond, through use of some or all of the following measures as appropriate:
- a. the management and control of parking.
 - b. the type of parking – ensuring that where appropriate long-stay parking is managed and minimised in town centres, to support parking for leisure and retail customers and to encourage commuters to use more sustainable means and reduce peak hour traffic flows.
 - c. maximum parking standards – ensuring that a consistent approach to maximum parking standards is enforced in new developments as set out in local planning guidance.
 - d. the location of parking – by reviewing the location of town centre car parks through the “Network Management Duty”, to ensure that the flow of traffic around town centres is as efficient as possible.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP73	0	0	0	+	0	0	+	0	+	0	0	0	0	0

D.13.7.1 Policy DLP73 aims to guide traffic within the borough through parking measures that strive to reduce the impacts of vehicle use on air quality through discouraging car use in centres. The policy states it will “encourage commuters to use more sustainable means and reduce peak hour traffic flows” through ensuring long-stay parking is removed where appropriate from town centres. Additionally, the policy prioritises the need to strategically locate parking “to ensure that the flow of traffic around town centres is as efficient as possible”. Overall, the policy could potentially have minor positive impacts on climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9), although this would need to be confirmed through ongoing monitoring.

D.13.8 Policy DLP74 – Planning for Low Emission Vehicles

Policy DLP74 – Planning for Low Emission Vehicles

- 1) The Council will support the development of low emission vehicle technologies and provide facilities and measures which enable the ease of use of low emission vehicles, by:
- a. Ensuring that new developments include adequate provision for charging infrastructure e.g. electric vehicle charging points in car parks, measures to encourage LEV use through travel plans and other initiatives.
 - b. Where appropriate, facilitating the introduction of charging points in public locations.

Policy DLP74 – Planning for Low Emission Vehicles

- c. Working with partners to explore support for alternative low emission vehicle technologies, such as hydrogen fuel cells, across a range of modes; private cars, buses and/or small passenger and fleet vehicles.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP74	0	0	0	+	0	0	+	0	+	0	0	+	0	0

D.13.8.1 Policy DLP74 provides measures that will enable the use of low emission vehicles, helping to meet the aim set in July 2019 by the West Midlands Combined Authority to achieve net zero emissions by 2041⁶³.

D.13.8.2 The policy supports the delivery of electric vehicle charging infrastructure and encourages opportunities to be sought for alternative technologies for transport including buses. Electric vehicles (EVs), which are an efficient alternative to petrol and diesel-powered vehicles (primarily because they do not emit air pollutants such as PM₁₀), can potentially have a positive impact effect on human health through improving air quality. Through facilitating the uptake of EVs and potentially low or zero-emission public transport, the policy would also help to reduce transport associated GHG emissions and the associated contribution towards climate change. Overall, this policy would be likely to have a minor positive impact on climate change mitigation, air pollution, transport and public health (SA Objectives 4, 7, 9 and 12).

⁶³ West Midlands Combined Authority (2022). Five Year Plan. Available at: <https://www.wmca.org.uk/documents/environment-energy/five-year-plan/overview/> [Date accessed: 29/06/23]

D.14 Waste

D.14.1 Policy DLP75 – Waste Infrastructure - Future Requirements

Policy DLP75 – Waste Infrastructure - Future Requirements

- 1) Proposals for relevant, major development shall evidence how its operation will minimise waste production, as well as facilitating the re-use and recovery of waste materials including, for example, through recycling, composting and energy from waste.
- 2) Proposals for waste management facilities to deal with waste arisings will be encouraged based upon the following principles;
 - a. managing waste through the waste hierarchy in sequential order. Sites for the disposal of waste will only be permitted where it meets a need which cannot be met by treatment higher in the waste hierarchy.
 - b. promoting the opportunities for on-site management of waste where it arises and encouraging co-location of waste developments that can use each other’s waste materials.
 - c. ensuring that sufficient capacity is located within the borough to accommodate the waste capacity requirements during the Plan period (as far as practically possible) and reducing the reliance on other authority areas.
 - d. enabling the development of recycling facilities across the borough including civic amenity sites and ensure that there is enough capacity and access for the deposit of municipal waste for re-use, recycling and disposal.
 - e. waste must be disposed of, or be recovered in, one of the nearest appropriate facilities, by means of the most appropriate methods and technologies, to ensure a high level of protection for the environment and public health.
 - f. ensuring new waste management facilities are located and designed to avoid unacceptable adverse impacts on the townscape and landscape, human health and well-being, nature conservation and heritage assets and amenity.
 - g. working collaboratively with neighbouring authorities with responsibilities for waste who import waste into, or export waste out of, the borough, to ensure a co-operative cross boundary approach to waste management is maintained.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP75	0	0	0	0	0	0	0	++	0	0	0	0	0	0

D.14.1.1 Policy DLP75 sets out the strategy for waste management within the borough. The policy also sets out the levels of new waste management capacity likely to be needed to support the proposed growth across the Plan period.

- D.14.1.2 Policy DLP75 supports development proposals that *"minimise waste production, as well as facilitating the re-use and recovery of waste materials"* and aims to encourage development proposals *"managing waste through the waste hierarchy"* and *"ensuring that sufficient capacity is located within the borough to accommodate the waste capacity requirements during the Plan period (as far as practically possible) and reducing the reliance on other authority areas"*. The policy seeks to promote the re-use and recycling of materials. Overall, the policy would be expected to help reduce the volume of waste generated in the borough and improve the management and disposal of waste. Therefore, a major positive impact would be expected (SA Objective 8).
- D.14.1.3 The policy also seeks to ensure *"new waste management facilities are located and designed to avoid unacceptable adverse impacts on the townscape and landscape, human health and well-being, nature conservation and heritage assets and amenity"*. The criteria would be likely to help avoid adverse impacts in relation to landscape, human health, biodiversity and cultural heritage. Therefore, negligible impacts would be likely against these objectives (SA Objectives 1, 2, 3 and 12).

D.14.2 Policy DLP76 – Waste Sites

Policy DLP76 – Waste Sites

Protecting Waste Sites

- 1) The Council will safeguard all existing strategic (as listed in the 'Justification' below) and other waste management facilities from inappropriate development to maintain existing levels of waste management capacity, unless it can be demonstrated that:
 - a. there is no longer a need for the facility; and
 - b. capacity can be met elsewhere; or
 - c. appropriate compensatory provision is made in appropriate locations elsewhere in the borough; or
 - d. the site is required to facilitate the strategic objectives of the Plan.
- 2) This policy will also apply to all new waste management sites that are implemented within the lifetime of the plan.

New development near existing waste facilities

- 3) Proposals for housing and other potentially sensitive uses will not be permitted near to⁶⁴ or adjacent to an existing waste management site where there is potential for conflict between the uses that cannot be fully mitigated (applying the 'agent of change' principles) unless:
 - a. a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent waste use; or
 - b. redevelopment of the waste site or loss of waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or infrastructure for the waste use and alternative provision is made for the displaced waste use; or

⁶⁴ The definition of 'near' in terms of specific distances is likely to vary according to the nature of the individual waste site. The Black Country Waste Study (2020) suggests 100-150metres should be applied for more significant uses with tighter boundaries around smaller facilities.

Policy DLP76 – Waste Sites

- c. a suitable replacement site or infrastructure has otherwise been identified and permitted.
- 4) Waste Site Impact Assessments will be expected to demonstrate that at least one of the above criteria applies. Applications should also identify any 'legacy' issues arising from existing or former waste uses, and how these will be addressed through the design of the development and the construction process.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP76	0	0	0	0	0	0	0	+	0	0	0	0	0	0

D.14.2.1 The aim of Policy DLP76 is to safeguard and retain capacity of the existing waste facilities in the borough. The policy also states that “*proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent to an existing waste management site where there is potential for conflict between the uses*”. The policy would be likely to help ensure appropriate waste management continues in the borough and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste would be expected (SA Objective 8).

D.14.3 Policy DLP77 – Preferred Areas for New Waste Facilities

Policy DLP77 – Preferred Areas for New Waste Facilities

- 1) The preferred location for new waste management facilities in the borough is the Local Employment Area shown on the Policies Map and Waste Key Diagram (Bloomfield Road/Budden Road, Coseley).
- 2) All proposals for new waste management facilities should demonstrate how they will contribute to the strategic objectives of Policy DLP75, such as the contribution they will make to landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 3) All applications for waste development will be expected to comply with the requirements in Policy DLP78.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP77	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0

D.14.3.1 Policy DLP77 identifies a preferred location for new waste management infrastructure in the borough at Bloomfield Road/Budden Road in Coseley. The provision of waste management facilities would be likely to have a major positive impact on waste, by

ensuring there are adequate facilities and capacity within the borough to effectively manage waste production (SA Objective 8).

- D.14.3.2 At present, the scale and location of the proposed waste management facilities in unknown. Seeking to manage the borough's waste rather than exporting to surrounding areas could potentially result in some benefits, such as reducing the need to transport waste, although the extent of these benefits is unknown at present. Overall, the impact in relation to environmental objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7 and 9).
- D.14.3.3 The provision of waste management facilities would not be expected to directly impact housing, equality, health, economy or education (SA Objectives 10, 11, 12, 13 and 14).

D.14.4 Policy DLP78 – Locational Considerations for New Waste Facilities

Policy DLP78 – Locational Considerations for New Waste Facilities

Key Locational Considerations for All Waste Management Proposals

- 1) Proposals should demonstrate how they will contribute to the strategic objectives of Policy DLP75, such as the contribution they will make towards landfill diversion, delivery of new waste management capacity and diversification of the range of facilities currently available.
- 2) Development for new build waste management facilities should be focused in local employment areas (primarily Local Employment Areas – Policy DLP20) and will be required to meet the following criteria:
 - a. evidence the need for the facility.
 - b. all waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained in buildings.
 - c. proposals must accord with all other policies in relation to the protection of the natural and historic environment and public amenity, or demonstrate that other material considerations outweigh any policy conflicts.
 - d. consideration will be given to the potential impacts of waste management proposals on
 - i. minimising adverse visual impacts.
 - ii. potential detrimental effects on the environment and public health.
 - iii. generation of odours, litter, light, dusts, and other infestation.
 - iv. noise, excessive traffic and vibration.
 - v. risk of serious fires through combustion of accumulated wastes.
 - vi. harm to water quality and resources and flood risk management.
 - vii. land instability.
 - viii. land use conflict; proposals should demonstrate compatibility with the uses already present within / adjacent to the area.
 - ix. where necessary mitigation measures should be identified to reduce any adverse effects to an acceptable level.
 - x. whether the proposal would provide opportunities for co-location of related uses and / or generate other benefits (for example; produce a range of waste types or streams, produce high quality aggregates or other useful raw materials, or supply heat and power or other forms of energy to adjacent uses).

Policy DLP78 – Locational Considerations for New Waste Facilities

Waste Applications – Supporting Information

- 3) Planning applications for waste development (Note 1 below) should include a supporting statement that clearly describes the key characteristics of the development. It should also explain how the development aligns with the principles and preferred methods of managing waste in Policy DLP75. In particular, the application should explain the contribution the development would make towards driving waste up the waste hierarchy, supporting the development of a more circular economy, meeting the borough’s additional waste capacity requirements, and broadening the range of waste facilities currently available in the plan area.
- 4) The following information should also be included in the supporting statement and/or on the planning application form:
 - a. The type of waste facility or facilities proposed.
 - b. The waste streams and types of waste to be managed.
 - c. The types of operation to be carried out on the site.
 - d. Whether waste would be sourced locally, regionally or nationally.
 - e. The maximum operational throughput in tonnes per annum.
 - f. For waste disposal, the total void space to be infilled in cubic metres.
 - g. The outputs from the operations, including waste residues.
 - h. The expected fate and destination of the outputs.
 - i. The number of associated vehicular movements.
 - j. The number of jobs created.

Notes: (1) This includes applications for new build waste developments, changes of use to waste developments, applications for new operational development and other material changes to existing waste sites, and ‘s73’ applications to vary a condition attached to an existing waste permission.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP78	0	0	0	0	0	0	0	+	0	0	0	0	+	0

D.14.4.1 Policy DLP78 sets out criteria which new waste management facilities should be in accordance with. Waste management facilities will only be supported where there is an identified need for the facility. This would be likely to help fill any gaps in the borough and meet the locally identified waste management needs. The policy also supports allocations in line with the waste hierarchy. A minor positive impact on waste would therefore be expected (SA Objective 8).

D.14.4.2 Through supporting waste development and efficient use of resources, the policy could lead to benefits for the local economy as well as potentially through job creation (SA Objective 13).

D.14.4.3 The policy states that consideration will be given to *"visual impacts"*, *"detrimental effects on the environment and public health"*, *"noise, excessive traffic and vibration"* and *"water quality and resources and flood risk management"* when allocating waste management facilities. These criteria would be expected to help prevent adverse impacts on these receptors, and therefore, negligible impacts have been identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12).

D.14.4.4 Policy DLP78 states *"proposals must accord with all other policies in relation to the protection of the natural and historic environment and public amenity"*. It is recommended that this statement is expanded, and further detail provided to clarify these requirements.

D.14.5 Policy DLP79 – Resource Management and New Development

Policy DLP79 – Resource Management and New Development	
1)	All new developments should; <ol style="list-style-type: none"> Address waste as a resource. Minimise waste as far as possible. Design sites with resource and waste management in mind. Manage unavoidable waste in a sustainable and responsible manner. Maximise use of materials with low environmental impacts.
2)	Where a proposal includes uses likely to generate significant amounts of waste, these should be managed either on-site or in as close a proximity as possible to the source of the waste.
3)	Resource and waste management requirements should be reflected in the design and layout of new development schemes. Wherever possible building, engineering and landscaping projects should use alternatives to primary aggregates such as secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts. Consideration should also be given to how waste will be managed within the development once it is in use.
4)	Where redevelopment of existing buildings or structures and/or remediation of derelict land is proposed, construction, demolition and excavation wastes (CD&EW) should be managed on-site where feasible and as much material as possible should be recovered and re-used for engineering or building either on-site or elsewhere.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP79	0	0	0	0	0	+	0	++	0	0	0	0	0	0

D.14.5.1 Policy DLP79 sets out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation.

D.14.5.2 The policy requires all new developments to *"minimise waste as far as possible"* and seeks to maximise the use of *"secondary and recycled materials, renewable and locally sourced"*

products and materials with low environmental impacts wherever possible. This policy would be expected to promote sustainable and efficient waste management and use of materials across all new development in the borough and limit the generation of waste as much as is feasible. Furthermore, the policy seeks to ensure that development design takes into account the need for waste management, when occupied. Overall, a major positive impact on waste would be expected (SA Objective 8).

D.14.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, the policy would be expected to result in a minor positive impact on natural resources (SA Objective 6).

D.14.5.4 Policy DLP79 also seeks to ensure that environmental impacts as a result of resource management and new development are minimised. The policy encourages the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors would be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

D.15 Minerals

D.15.1 Policy DLP80 – Mineral Production - Requirements

Policy DLP80 – Mineral Production - Requirements	
1)	To enable the Dudley Borough to make an appropriate contribution towards identified local and regional requirements, the following provision is identified for minerals over the Plan period.
Construction Aggregates - Secondary and Recycled Aggregates	
2)	The supporting evidence base identifies the estimated quantity of secondary and recycled aggregates per annum being produced at permitted production sites within the borough (Dudley Minerals Study, forthcoming). As a minimum, the Council will aim to maintain this level of production throughout the Plan period. In support of this, permitted secondary and recycled aggregates sites expected to continue in production up to 2041 will be safeguarded (see Policy DLP81).
Efficient Use of Mineral Resources	
3)	All new developments will be encouraged to be resource-efficient, by making the maximum possible use of recycled mineral products in construction, to reduce reliance on quarried products and help maintain existing supplies for longer.
4)	To address strategic matters related to the supply of minerals, the Council will continue to work with relevant local authorities and other stakeholders (including via the West Midlands Aggregate Working Party) and will contribute to the publication of Local Aggregates Assessments for the West Midlands Metropolitan Area.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP80	0	0	0	0	0	+	0	+	0	0	0	0	+	0

D.15.1.1 Policy DLP80 sets out requirements for the production of construction aggregate and industrial minerals in the borough. The policy would be expected to help the borough "make an appropriate contribution towards identified local and regional requirements" in accordance with the latest evidence (the emerging Dudley Minerals Study). This policy would be expected to have a minor positive impact on natural resources within the borough (SA Objective 6). The support for production of secondary and recycled aggregates would contribute towards the preservation of primary aggregates and could potentially help to avoid unnecessary waste leading to a minor positive impact on SA Objective 8.

D.15.1.2 This policy would also be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13). Aggregate production can also have a role to play in the provision of materials for infrastructure including inland fluvial and coastal defence infrastructure, however, this policy is not considered to result in direct impacts on any other SA Objective.

D.15.2 Policy DLP81 – Minerals Safeguarding

Policy DLP81 – Minerals Safeguarding

- 1) Mineral deposits that are identified as being, or may become of, economic importance will be safeguarded from unnecessary sterilisation.
- 2) Where non-mineral development is proposed, encouragement will be given to the extraction of any identified mineral resource prior to or in conjunction with, development, where this would not have unacceptable impacts on neighbouring uses. This applies to developments over five hectares (for new building development only, i.e., excluding changes of use and conversions). Such developments should be accompanied by supporting information (as set out in the Justification) demonstrating that mineral resources will not be needlessly sterilised.
- 3) The location of currently permitted mineral infrastructure sites are identified on the Minerals Key Diagram and are listed in the 'Justification' below. Applications for development within a 150m buffer zone of these sites will need to demonstrate they will not have any unacceptable impacts on these sites that would prevent them from continuing to operate. Any new mineral infrastructure sites which come forward during the plan period will also be subject to these policy provisions.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP81	0	0	0	0	0	+	0	0	0	0	0	0	0	0

D.15.2.1 Policy DLP81 seeks to safeguard areas of land containing potential mineral resources of economic importance from other types of development that could compromise the availability of resources. Under the policy, other development uses which could affect mineral deposits should seek to extract mineral resources prior to development provided that adverse effects on neighbouring land uses can be avoided. This policy would be expected to protect mineral resources in the borough and therefore have a minor positive impact on natural resources (SA Objective 6).

D.15.3 Policy DLP82 – Managing the Effects of Mineral Development

Policy DLP82 – Managing the Effects of Mineral Development

- 1) Proposals for new mineral working or mineral-related infrastructure at both new and existing sites should demonstrate how they contribute towards the strategic objectives of Policy DLP80. They should accord with all other policies of the Local Plan including those in relation to the protection of the environment, public amenity and health, and surrounding land uses, or otherwise demonstrate that other material considerations outweigh any policy conflict. Proposals will be assessed in terms of:
 - a. minimising any adverse visual impacts.
 - b. effects on natural (including ecological networks), built, and historic (including archaeological) environments and on public health.
 - c. generation of noise, dust, vibration, lighting, and excessive vehicle movements.

Policy DLP82 – Managing the Effects of Mineral Development

- d. compatibility with neighbouring uses – taking into account the nature of the operations, hours of working, the timing and duration of operations and any cumulative effects.
- e. harm to water quality and resources and flood risk management.
- f. ground conditions and land stability.
- g. land use conflict – proposals should demonstrate compatibility with the uses already present within the surrounding area.
- h. impacts on the highway, transport, and drainage network.
- i. where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP82	0	0	0	0	0	+	0	0	0	0	0	0	0	0

- D.15.3.1 Policy DLP82 sets out criteria by which development proposals for mineral working and related infrastructure would be expected to comply. All development proposals will need to contribute to the objectives as set out in Policy DLP80. A minor positive impact on natural resources would therefore be expected (SA Objective 6).
- D.15.3.2 Under this policy, proposals for mineral extraction sites would be assessed in terms of the *"effects on natural (including ecological networks), built, and historic (including archaeological) environments and on public health"* and *"should demonstrate compatibility with the uses already present within the surrounding area"*. These factors would be likely to help prevent adverse impacts on cultural heritage, landscape and biodiversity, and therefore, negligible impacts have been identified (SA Objectives 1, 2 and 3).
- D.15.3.3 Mineral extraction sites under Policy DLP82 would be assessed in terms of *"generation of noise, dust, vibration, lighting, and excessive vehicle movements"* which would be expected to have benefits to transport and congestion, as well as reducing pollution and carbon emissions. Nevertheless, the transportation of minerals would be expected to lead to a high number of HGVs on nearby roads. Overall, a negligible impact on climate change mitigation, pollution and transport would be likely (SA Objectives 4, 7 and 9).
- D.15.3.4 Development proposals for minerals extraction will be assessed for their effect on public health under this policy. This would be expected to help prevent development resulting in adverse impacts on human health, including inappropriate noise pollution and vibrations. Overall, a negligible impact on health would be likely (SA Objective 12).
- D.15.3.5 Policy DLP82 will assess development proposals in terms of *"harm to water quality and resources and flood risk management"*. This would be likely to help ensure proposals

under this policy do not exacerbate local flood risk, and therefore, a negligible impact would be expected (SA Objective 5).

D.16 Development Management

D.16.1 Policy DLP83 – Access for All

Policy DLP83 – Access for All														
1) Dudley Borough shall be an environment accessible and inclusive to all members of its community.														
2) All new development for townscape and landscape enhancements shall be informed by the Access for All SPD (or any subsequent guidance) in particular to seek to incorporate measures for the ease of access for disabled, infirm and partially sighted persons.														
3) This is particularly to ensure unhindered movement for all within Dudley’s Centres, along its Canals and the River Stour, and other footpaths and pedestrian linkages.														
4) This is providing that such measures would not conflict with the value, character or setting of heritage assets or would not prevent works which would provide substantial benefits to the wider local community from being realised.														

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP83	0	0	0	+	0	0	+	0	+	0	+	+	0	0

D.16.1.1 Policy DLP83 centres aims surrounding the accessibility of borough. The policy states that Dudley Borough will be “*an environment accessible and inclusive to all members of its community*” and that development for townscape and landscape enhancement will “*seek to incorporate measures for the ease of access for disabled, infirm and partially sighted persons*” in line with the Access for All SPD⁶⁵. Therefore, the policy can be expected to provide a minor positive impact on equality within the borough (SA Objective 11).

D.16.1.2 Improvement to accessibility within the borough will potentially increase the number of residents opting to utilise outdoor spaces through more sustainable and active modes of transport, with less reliance on car use and consequently reduced emissions. One of the key objectives of the Access for All SPD is to improve pedestrian and cycle connectivity, as well as supporting access for less mobile people. Accessibility requirements directed towards disabled, infirm and partially sighted persons, creates a safer environment to live in. Therefore, the policy can be expected to have a minor positive impact on climate change mitigation and air quality, as well as the borough’s transport infrastructure and human health (SA Objectives 4, 7, 9 and 12).

⁶⁵ DMBC (2011) Access for All Supplementary Planning Document. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/access-for-all-spd/> [Date accessed: 29/06/23]

D.16.1.3 The policy states that accessibility measures will not *"conflict with the value, character or setting of heritage assets"*. Therefore, the policy can be expected to reduce potential harm to, and therefore result in a negligible impact on, the borough's landscape and cultural heritage (SA Objectives 1 and 2).

D.16.2 Policy DLP84 – Incompatible Land Uses

Policy DLP84 – Incompatible Land Uses														
1) Development will not be permitted if it is incompatible, in terms of its environmental impact, with the surrounding uses and suitable mitigation cannot be provided (prior to the development being completed).														
2) This will particularly be as a result of the amenity of the occupiers of existing and proposed buildings and the users of the public realm at or near to the site potentially being subject to undue harm as a result of development, especially by virtue of noise and disturbance, light and air pollution, and odours and fumes. This especially relates to the amenity of the occupiers of dwellings. The 'agent of change' principle as detailed in national planning policy will be applied to development proposals.														

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP84	0	0	+	0	0	0	+	0	0	0	0	+	0	0

D.16.2.1 Policy DLP84 sets out the issues of development and particular land uses that would need to be mitigated and addressed, including *"noise and disturbance, light and air pollution, and odours and fumes"*. Therefore, the policy can be expected to have a minor positive impact on pollution and health of residents (SA Objectives 7 and 12).

D.16.2.2 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).

D.16.3 Policy DLP85 – Contaminated Land

Policy DLP85 – Contaminated Land														
1) A preliminary risk assessment of contaminated land is required at the planning application stage for all major development and for smaller scale sensitive development where contamination is known or suspected to be present.														
2) Where a satisfactory preliminary risk assessment identifies it is necessary, an intrusive site investigation and quantitative risk assessment are also required at the planning application stage.														
3) Where planning permission is granted, conditions may be placed which require the applicant to undertake further action in relation to: <ul style="list-style-type: none"> a. provision of a risk assessment and options appraisal. 														

Policy DLP85 – Contaminated Land

- b. formulation of a sustainable remediation strategy.
 - c. implementation and verification of the remediation strategy.
 - d. the sustainable remediation of contaminated land not previously identified.
 - e. Long term monitoring and/or maintenance of remedial measures where identified as being required by the remediation strategy.
- 4) The requirements of criteria 1 – 3 must be undertaken in line with best practice guidance and by a competent environmental specialist as defined in the UK Government Land Contamination Risk Management (LCRM) guidance, NPPF and PPG.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP85	0	0	0	0	0	+	+	0	0	0	0	+	0	0

D.16.3.1 Policy DLP85 outlines requirements for development proposals in relation to contaminated land of sites at the planning application stage.

D.16.3.2 The policy states that a preliminary risk assessment is required at the planning application stage for major sites, with the risk assessment also required for smaller sites that suspect land contamination or are aware of contamination on the site. Assessing for contaminated land will help to avoid adverse health issues associated with contamination of water supplies, food and soils and exposure to hazardous gases that would contribute to polluting air quality by ensuring any contamination can be remediated prior to occupation. Therefore, the policy can be expected to have a minor positive impact on natural resources, pollution and the health of residents (SA Objectives 6, 7 and 12).

D.16.4 Policy DLP86 – Unstable Land

Policy DLP86 – Unstable Land

- 1) Where it is known or suspected that land stability may have an impact on any development or works to upgrade the local environment, planning applications must be accompanied by sufficient proportionate information to determine the extent of the instability.
- 2) The developer will be required to undertake an assessment of the potential of such works to mitigate against or ensure that there are no significant adverse impacts on controlled waters and geological features of value.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP86	0	0	+	0	0	+	0	0	0	0	0	0	0	0

D.16.4.1 Policy DLP86 seeks to address the evidenced legacy of unstable land within the borough through the development process.

D.16.4.2 The policy states that development which is suspected to be affected by land instability will require “sufficient proportionate information” within the planning application. Therefore, the policy could potentially help to conserve soil resources, leading to a minor positive impact on natural resources (SA Objective 6).

D.16.4.3 Policy DLP86 requires the developer to undertake an assessment “to mitigate against or ensure that there are no significant adverse impacts on controlled waters and geological features of value”. The assessment could potentially help to protect water quality within aquatic habitats that are located within these features and wider habitats connected to, or reliant upon these features. Therefore, the policy can be expected to have a minor positive impact on biodiversity and geodiversity (SA Objective 3).

D.16.5 Policy DLP87 – Noise Pollution

Policy DLP87 – Noise Pollution														
1) Where development has the potential to generate noise, the Council will require any such proposal to include measures that would minimise noise emissions and intrusions to an agreed, acceptable level.														
2) Where development would be subject to high noise levels the Council will require the proposal to include measures to reduce noise intrusion to an agreed, appropriate level.														
3) The Council will not permit development for either noise-generating proposals or noise-sensitive proposals where:														
a. a juxtaposition of uses arise.														
b. noise levels are assessed as being significant to the extent that amenity will be demonstrably prejudiced despite the provision of mitigation measures and, where those mitigation measures are considered to be inappropriate for the development proposal.														

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP87	0	0	0	0	0	0	+	0	0	0	0	+	0	0

D.16.5.1 Policy DLP87 aims to protect local residents from development resulting in noise pollution through requirements of development in the planning process.

D.16.5.2 The policy requires development proposals to include measures to mitigate noise emissions and intrusions to an acceptable level. The policy outlines conditions that would see noise-generating proposals or noise-sensitive proposals rejected by the Council. Therefore, the policy would be expected to have a minor positive impact on noise pollution and health of local residents who would be protected from adverse effects of noise intrusion (SA Objectives 7 and 12).

D.16.6 Policy DLP88 – Light Pollution

Policy DLP88 – Light Pollution

- 1) Applications for development that comprise or require external lighting must demonstrate that;
- a. the use and design of the lighting scheme is necessary, particularly on the grounds of public safety, and appropriate to the location and the use proposed and/or design of the scheme/building. Clustering of lighting installations will only be permitted in the interests of safety or to highlight an individual landmark building or thoroughfare or town centre area.
 - b. there is no harm to residential amenity.
 - c. light spillage is minimised and, where appropriate, measures are provided to:
 - i. screen lighting installations from view from neighbouring areas, especially within, to or from heritage assets and areas of Green Belt.
 - ii. to restrict the times of illumination.
 - d. there shall be no harm to protected wildlife species or habitats of acknowledged nature conservation importance including watercourses.
 - e. illumination shall not provide an undue distraction to users of the public highway. Approval of development which includes significant external lighting will contain appropriate conditions where necessary to mitigate against any negative impacts. Where such impacts cannot be mitigated and there is the potential for significant harm to the local environment, the Council will refuse permission for that scheme.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP88	+	+	+	0	0	0	+	0	0	0	0	+	0	0

D.16.6.1 Policy DLP88 outlines requirements of development proposals that comprise or require external lighting within the planning process.

D.16.6.2 The policy aims to protect the local environment from light pollution, refusing permission where mitigation cannot be evidenced. Therefore, the policy can be expected to provide a minor positive impact on light pollution within the borough (SA Objective 7).

- D.16.6.3 The policy addresses the importance of design, specifically in relation to the safety of the public and that proposed development that requires lighting would need to demonstrate "no harm to residential amenity" and "shall not provide an undue distraction to users of the public highway". Therefore, the policy can be expected to have a minor positive impact on the health of residents (SA Objective 12), and potentially on the local landscape character (SA Objective 2).
- D.16.6.4 The policy additionally seeks to minimise the impact light spillage can have on heritage assets within the borough, addressed through screening lighting installations. Therefore, the policy could potentially have a minor positive impact on heritage assets within the borough, through helping to conserve the setting of heritage assets (SA Objective 1).
- D.16.6.5 Recognising the damage light pollution can have on local wildlife, the policy sets out the requirement for development to demonstrate "no harm to protected wildlife species or habitats of ... nature conservation importance including watercourses". Therefore, the policy will be likely to have a minor positive impact on biodiversity within the borough (SA Objective 3).

Policy DLP89 – Control of Advertisements

- 1) The Council will resist the display of any advertisement which is detrimental to:
 - a. the appearance of the building and/or land upon which it is displayed.
 - b. the visual amenity and character of the surrounding area including key views and vistas.
 - c. public safety including highway safety.
- 2) The Council will require that the scale and design of any proposed advertisement should:
 - a. be in keeping with the scale and character of the area and any adjacent or nearby buildings.
 - b. be appropriate to the surroundings and any recognised heritage assets or buildings and locations identified as being heritage assets.
 - c. avoid obscuring any elevational design details and architectural features of a building.
 - d. be appropriately and sensitively illuminated.
 - e. avoid the cumulative impact of advertisements which may result in over proliferation and cluttering of the street-scene.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP89	0	+	0	0	0	0	0	0	0	0	0	+	0	0

- D.16.6.6 Policy DLP89 provides requirements for the appropriate design and location of advertisements to prevent adverse impacts on the surrounding landscape, environment, and cultural heritage of the borough.

- D.16.6.7 Advertisement proposals will be rejected when the proposal is found to be detrimental to “*public safety including highway safety*”. The policy would therefore be expected to have a minor positive impact on the health and safety of residents within the borough (SA Objective 12).
- D.16.6.8 The policy states that advertisement proposals “*must be in keeping with the scale and character of the area*”. The policy would be likely to have a minor positive impact on the surrounding landscape by conserving local identity and character (SA Objective 2).
- D.16.6.9 The policy outlines requirements to demonstrate how the development will “*be appropriate to the surroundings and any recognised heritage assets*”. These measures would be expected to have a negligible impact on cultural heritage, by seeking to reduce potential for harm to heritage assets (SA Objective 1).

Appendix E: Policy Assessments – DLP Part 2 Allocations & Centres

Appendix E Contents

E.1	Overview	E1
E.1.1	Introduction	E1
E.1.2	Overview of Policy Assessments	E2
E.2	Brierley Hill	E5
E.2.1	Policy DLPBH1 – Development within the Brierley Hill Strategic Centre Core.....	E5
E.2.2	Policy DLPBH2 – Brierley Hill Design - Landmarks, Views, Vistas and Gateways	E6
E.2.3	Policy DLPBH3 – Public Realm in Brierley Hill	E9
E.2.4	Policy DLPBH4 – Green Infrastructure in Brierley Hill	E11
E.2.5	Policy DLPBH5 – Conservation and Enhancement of Local Character and Distinctiveness in Brierley Hill	E12
E.2.6	Policy DLPBH6 – Brierley Hill High Street and Delph Nine Locks Conservation Areas.....	E13
E.2.7	Policy DLPBH7 – Sustainable Transport and Active Travel in Brierley Hill Strategic Centre.....	E13
E.2.8	Policy DLPBH8 – Residential Growth in Brierley Hill	E15
E.2.9	Policy DLPBH9 – Office and Employment Uses in Brierley Hill	E16
E.2.10	Policy DLPBHPS1 – (Priority Site) Land at Waterfront Way and Level Street	E17
E.2.11	Policy DLPBHPS2 – (Priority Site) The Embankment / Daniels Land	E21
E.2.12	Policy DLPBHOS1 – Brierley Hill Strategic Centre Opportunity Site: Brierley Hill Civic Core	E24
E.2.13	Policy DLPBHOS2– Brierley Hill Strategic Centre Opportunity Site: The Waterfront East Entertainment Zone	E27
E.2.14	Policy DLPBHOS3 – Brierley Hill Strategic Centre Opportunity Site: The Venture Way Health and Education Zone	E29
E.3	Dudley Town Centre.....	E32
E.3.1	Policy DLPD1 – Development in Dudley Town Centre and Town Centre Core Area	E32
E.3.2	Policy DLPD2 – Areas outside the Town Centre Boundary	E33
E.3.3	Policy DLPD3 - Dudley Town Design - Landmarks, Views, Vistas and Gateways.....	E34
E.3.4	Policy DLPD4 – Public Realm in Dudley Town	E38
E.3.5	Policy DLPD5 – Conservation and Enhancement of Local Character and Distinctiveness in Dudley ..	E39
E.3.6	Policy DLPD6 – Dudley Town Centre Conservation Area	E40
E.3.7	Policy DLPD7 – Castle Hill Conservation Area.....	E42
E.3.8	Policy DLPD8 – Sustainable Transport and Active Travel in Dudley Town Centre.....	E43
E.3.9	Policy DLPDPS1 – (Priority Site) Land at King Street/Flood Street.....	E44
E.3.10	Policy DLPDPS2 – (Priority Site) Land at Trindle Road/Hall Street/Birdcage Walk (Portersfield)	E49
E.3.11	Policy DLPDOS1 – Dudley Town Centre Opportunity Site: Tower Street/Castle Street.....	E54
E.3.12	Policy DLPDOS2 – Dudley Town Centre Opportunity Site: Trident Centre/Upper High Street.....	E56
E.3.13	Policy DLPDOS3 – Dudley Town Centre Opportunity Site: Upper High Street/King Street.....	E59
E.3.14	Policy DLPDOS4 – Dudley Town Centre Opportunity Site: Abberley Street/King Street	E61
E.4	Stourbridge Town Centre.....	E64
E.4.1	Policy DLPS1 – Stourbridge Town Centre and Town Centre Core Area	E64

E.4.2	Policy DLPS2 – Stourbridge Wharf	E64
E.4.3	Policy DLPS3 – Urban Character and Appearance in Stourbridge	E66
E.4.4	Policy DLPS4 – Stourbridge Town Design – Landmarks, Views, Vistas and Gateways	E67
E.4.5	Policy DLPS5 – Public Realm in Stourbridge.....	E70
E.4.6	Policy DLPS6 – Conservation and Enhancement of Local Character and Distinctiveness in Stourbridge.	E72
E.4.7	Policy DLPS7 – Stourbridge Ring Road	E73
E.4.8	Policy DLPS8 – Pedestrian Access and Cycling in Stourbridge.....	E74
E.4.9	Policy DLPSOS1 – North of Birmingham Street.....	E75
E.4.10	Policy DLPSOS2 – Mill Race Lane.....	E77
E.4.11	Policy DLPSOS3 – Rye Market	E79
E.5	Halesowen Town Centre.....	E82
E.5.1	Policy DLPH1 – Halesowen Town Centre and Town Centre Core Area	E82
E.5.2	Policy DLPH2 – Education in Halesowen	E83
E.5.3	Policy DLPH3 – Urban Character and Appearance in Halesowen	E83
E.5.4	Policy DLPH4 – Halesowen Town Design – Landmarks, Views, Vistas and Gateways	E84
E.5.5	Policy DLPH5 – Public Realm in Halesowen.....	E87
E.5.6	Policy DLPH6 – Landscape and Public Realm/Open Space Network in Halesowen	E88
E.5.7	Policy DLPH7 – Conservation and Enhancement of Local Character and Distinctiveness in Halesowen	E90
E.5.8	Policy DLPH8 – Access and Movement in Halesowen.....	E91
E.5.9	Policy DLPHOS1 – Development Opportunity Site 1: Trinity Point	E93
E.5.10	Policy DLPHOS2 – Development Opportunity Site 2: Link House and Pioneer House	E95
E.5.11	Policy DLPHOS3 – Development Opportunity Site 3: Little Cornbow.....	E97
E.5.12	Policy DLPHOS4 – Development Opportunity Site 4: Fountain House	E99
E.5.13	Policy DLPHOS5 – Development Opportunity Site 5: Pool Road Car Park.....	E101
E.6	Housing Allocations	E104
E.6.1	Policy DLPKQH1 – Land at Ketley Quarry, Kingswinford.....	E104
E.7	Local Green Space	E109
E.7.1	Policy DLPLGS1 – Corbett Meadow Local Green Space	E109

Tables

Table E.1.1: Presenting likely impacts	E2
Table E.1.2: Summary of policy assessments	E3

E.1 Overview

E.1.1 Introduction

- E.1.1.1 This appendix provides an assessment of draft policies proposed by Dudley Metropolitan Borough Council (DMBC) at the Regulation 18 stage of the preparation of the Dudley Local Plan (DLP) Part Two: Allocations and Centres.
- E.1.1.2 **Appendix D** contains the assessment of policies from the DLP Part One: Spatial Strategy and Policies.
- E.1.1.3 The policies assessed within this appendix are based on the most up to date policy wording at the time of assessment, as presented within the Draft DLP Part 2: Allocations and Centres received 5th October 2023. The policy text used in the SA is presented in a box alongside each of the assessment narratives within this document. It should be noted that there may be minor wording changes to the policies compared to that within the Regulation 18 Consultation version of the DLP.
- E.1.1.4 Many of the policies within DLP Part 2 are derived from existing policies for the area and are being brought forward for the DLP; this includes policies from the Dudley, Stourbridge and Halesowen Area Action Plans (AAPs).
- E.1.1.5 Part of DMBC's spatial development strategy for the distribution of growth within is to focus a proportion of housing growth at a number of strategic sites. This includes Priority Sites and Opportunity Sites, which each have a specific policy prepared to guide development for their specified uses and take account of local constraints.
- E.1.1.6 20 site policies have been prepared alongside potential allocations for housing and/or employment uses, and one Local Green Space allocation policy, within the Draft DLP (Part 2).
- E.1.1.7 Each site has been assessed in detail alongside other reasonable alternative sites as summarised in **Chapter 7** of the main SA report. Where policies relate to sites, the assessment has drawn on this assessment information. The full supporting narrative for site assessments in **Appendix C** and methodology provided in **Chapter 2** of the main SA report, alongside the topic-specific methodology in **Appendix B**, should be read in conjunction with the site policy assessments.
- E.1.1.8 DMBC have considered the potential for mitigation in the site selection process and in the reasons for selecting and rejecting reasonable alternatives (see **section 7.4** of SA Main Report). The approach to 'post-mitigation scores' has only been applied to strategic housing sites accompanied by draft DLP policies. This is to ensure a consistent and transparent approach to the SA process in relation to information provided in the public domain in the form of DLP policies.
- E.1.1.9 'Post-mitigation' scores will also be considered at the Regulation 19 stage of the SA process, taking into account the policies as specified in the pre-submission version of the DLP.

E.1.1.10 Each policy appraised in this report has been assessed for its likely impacts on each SA Objective of the SA Framework (see **Appendix A**) and are in accordance with the methodology as set out in **Chapter 2** of the SA Main Report.

E.1.1.11 For ease of reference the scoring system is summarised in **Table E.1.1** below.

Table E.1.1: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

E.1.1.12 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

E.1.2 Overview of Policy Assessments

E.1.2.1 The impact matrices for Draft Policies DLPBH1 – DLPLGS1 (i.e. all policies from the DLP Part 2) are presented in Table E.1.2 below.

E.1.2.2 These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

E.1.2.3 Within these policy assessments, where relevant, some recommendations for enhancement or improvement of the draft policies have been suggested. Further detailed recommendations are presented in **Chapter 8** of the main SA Report.

Table E.1.2: Summary of policy assessments

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH1	0	0	0	+	0	0	0	0	+	0	0	+	+	0
DLPBH2	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPBH3	0	+	+	0	0	0	0	0	+	0	+	+	0	0
DLPBH4	0	+	++	+	+	0	+	0	0	0	0	+	0	0
DLPBH5	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPBH6	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPBH7	0	0	0	+	0	0	+	0	++	0	0	+	+	0
DLPBH8	0	0	0	+/-	+/-	+/-	+/-	+/-	++	++	+	+	+	+
DLPBH9	0	0	0	0	0	0	0	0	0	0	0	0	+	+
DLPBHPS1	+	+	+	-	-	-	-	-	++	++	0	+	++	0
DLPBHPS2	+	+	0	0	-	-	-	-	++	++	+	++	++	++
DLPBHOS1	-	0	+	+/-	-	-	-	+/-	0	0	0	++	+/-	+
DLPBHOS2	-	0	-	+/-	-	-	-	+/-	0	0	0	0	+/-	0
DLPBHOS3	-	0	+	+/-	-	-	-	+/-	0	+	+	++	+/-	++
DLPD1	0	+	0	0	0	+	0	0	0	+	+	+	++	+
DLPD2	0	0	0	0	0	0	0	0	0	0	0	+	+	0
DLPD3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPD4	+	+	+	0	+	0	+	0	+	0	0	+	0	0
DLPD5	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPD6	+	++	0	0	0	+	0	0	0	0	0	0	0	0
DLPD7	++	++	+	0	0	0	0	0	+	0	0	0	+	0
DLPD8	0	0	0	+	0	0	+	0	++	0	0	+	0	0
DLPDPS1	+	+	+	0	0	+	-	0	++	++	0	+	+	++
DLPDPS2	+	+	0	-	0	-	-	-	++	++	0	++	+/-	++
DLPDOS1	-	0	+	+/-	+	+	-	+/-	+	0	+	++	+	++
DLPDOS2	-	0	+	0	-	+	-	0	0	+	0	++	+/-	++
DLPDOS3	-	0	+	0	0	+	-	0	+	+	0	++	+/-	++
DLPDOS4	0	0	+	0	+	+	-	0	+	+	0	++	+/-	++
DLPS1	0	0	0	+	0	+	0	0	+	0	+	+	+	0
DLPS2	0	+	+	0	0	0	0	0	+	0	0	0	+	0
DLPS3	+	+	0	0	0	0	0	0	0	0	0	0	+	0
DLPS4	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPS5	0	+	+	0	0	0	0	0	+	0	0	+	+	0
DLPS6	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPS7	0	+	+	0	0	0	0	0	0	0	0	+	0	0
DLPS8	0	0	0	+	0	0	0	0	+	0	+	+	+	0
DLPSOS1	-	0	0	0	-	-	-	0	++	+	+	-	+/-	++
DLPSOS2	-	0	-	+/-	--	-	-	+/-	++	0	+	+	+	0
DLPSOS3	-	0	+	0	+	+	-	0	++	+	+	-	+/-	++

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH1	0	0	0	+	0	+	0	0	+	0	+	+	+	0
DLPH2	0	0	0	0	0	+	0	0	+	0	0	0	0	+
DLPH3	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPH4	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPH5	0	+	+	0	0	0	0	0	+	0	+	+	0	0
DLPH6	+	+	+	0	0	+	0	0	0	0	+	+	0	0
DLPH7	+	+	0	0	0	0	0	0	0	0	0	0	0	0
DLPH8	0	+	0	0	0	0	0	0	++	0	+	+	0	0
DLPHOS1	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++
DLPHOS2	-	0	-	0	--	-	-	0	0	+	+	-	+/-	++
DLPHOS3	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++
DLPHOS4	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++
DLPHOS5	0	+	+	0	+	+	-	0	0	+	+	-	++	++
DLPKQH1	0	-	+/-	+	0	-	-	-	+	++	+	+	+	+
DLPLGS1	0	0	+	0	0	+	0	0	0	0	0	+	0	0

E.2 Brierley Hill

E.2.1 Policy DLPBH1 – Development within the Brierley Hill Strategic Centre Core

Policy DLPBH1 – Development within the Brierley Hill Strategic Centre Core

- 1) The Brierley Hill Strategic Centre Boundary and Town Centre Core Area boundaries are identified on the Brierley Hill Strategic Centre Inset Policies Map.
- 2) In line with national and local planning policy, any new retail developments will be directed towards the Town Centre Core Areas. Dudley Council will consider the application of planning conditions to any planning permissions granted to ensure the retention of the retail use where necessary, relevant, and reasonable in terms of the strategic importance of the development.
- 3) The diversification and re-purposing of Brierley Hill Strategic Centre will be supported by approving development which enhances the viability and vitality of the centre. This is subject to the proposed use being appropriate to its location within the Strategic Centre and in accordance with Policy DLP24 of this plan.
- 4) Brierley Hill Strategic Centre should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial and business development that involve more than 500 sq m (gross) of floorspace within The Merry Hill Town Centre Core Area or within well-linked edge-of-centre locations to that core area, shall evidence the means to which they are compatible with the objectives of achieving sustainable development. This evidence must incorporate the setting out of provisions for the enablement or enhancement of sustainable means of travel and integrated modes of transport to and within individual strategic centres, with a particular focus on the management of demand for car parking and car-borne traffic, including through car parking regimes.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH1	0	0	0	+	0	0	0	0	+	0	0	+	+	0

E.2.1.1 Policy DLPBH1 sets out the broad approach to development within Brierley Hill Town Centre, with a strong focus on accessibility and transport links. By making the Strategic Centre “*accessible by a variety of means of transport, particularly walking, cycling and public transport*” this would be expected to result in a minor positive impact on transport, health and climate change mitigation (SA Objectives 4, 9 and 12). The promotion of active travel will encourage residents to be more active and should reduce dependence on private means of transport, therefore contributing to the mitigation of climate change.

E.2.1.2 This policy supports development which will enhance the vitality and viability of the town centre, and seeks to ensure that commercial and business developments are well linked to the core areas. Support is set out for new retail developments. As such, this could serve to increase footfall within Brierley Hill Town Centre and lead to increased visitors to

economic enterprises, with potential to boost the local economy, resulting in a minor positive impact on SA Objective 13.

E.2.2 Policy DLPBH2 – Brierley Hill Design - Landmarks, Views, Vistas and Gateways

Policy DLPBH2 - Brierley Hill Design - Landmarks, Views, Vistas and Gateways

All new development in the inset plan area for Brierley Hill should have regard to Local Plan Policy DLP39 to deliver high quality design. Developments within and in the setting of the Conservation Areas should have regard to policy DLP56.

New development and proposed alterations to existing buildings should:

- a. Enhance the sense of arrival by improving existing gateways and where appropriate create new ones that reinforce principal routes and spaces.
- b. Create architectural corner features and new landmark features to improve the understanding of the town where appropriate.
- c. Safeguard and enhance local and important views, vistas, landmarks and gateways within and at the edges of the town centre.
- d. Protect key gateway buildings that give the town character and respect building line, where appropriate, to assist the continuity of the town's heritage and help secure and improve views and vistas.
- e. Respect the height and mass and visibility of existing Brierley Hill landmarks. Such landmarks should not be overwhelmed by new development nor their setting compromised. Consideration of the effect on setting has regard to the importance of the landmark, the extent of any harm, and the benefit arising from development.
- f. Ensure that new buildings have a scale, mass, height, and impact that is responsive to its context and sensitive to its roofscape/skyline.
- g. Create variations in roofscape that will respect important local and strategic views.
- h. Ensure that larger development facades and rooflines should reduce their scale and massing by subdividing into smaller architectural elements.

Where new development is likely to have an impact on an identified view, skyline or landmark, accurate visual representations will be required as part of any development proposals. Choice of materials and finishes need careful consideration in order to protect and enhance the existing design context.

The following landmarks, gateways, views and vistas should be protected and enhanced where possible, in accordance with the above Policy considerations;

Strategic Landmark (Positive):

- SLP1- St Michael's Church
- SLP2- Brierley Hill War Memorial
- SLP3- Brierley Hill Civic Hall and Police Station
- SLP4- The Landmark building, Waterfront Way

Local Landmarks (Positive):

- LLP1- Delph Nine Locks/Dudley No. 1 Canal
- LLP2- Brierley Hill Market Hall

Policy DLPBH2 - Brierley Hill Design - Landmarks, Views, Vistas and Gateways

- LLP3- St Mary's Church
- LLP4- Brierley Hill Institute
- LLP5- Brierley Hill Health & Social Care Centre
- LLP6- Dudley College Inspired
- LLP7- Brierley Hop House (public house)
- LLP8- Resonance Music Institute
- LLP9- The Copthorne Hotel
- LLP10- Merry Hill Shopping Centre
- LLP11- Fat Yue Temple (Fa Yue Buddhist Monastery)

Edge Gateway:

- EG1- Hurst Lane/Level Street junction
- EG2- The Boulevard/Coppice Lane junction
- EG3- The Boulevard/Mill Street junction
- EG4- Church Street/Venture Way junction
- EG5- Bank Street/Level Street junction
- EG6- John Street/Dudley Road/Waterfront Way island
- EG7- Waterfront Way

Inner Gateway:

- IG1- Merry Hill bus station
- IG2- The Boulevard/The Embankment/Times Square Avenue island
- IG3- Level Street/Waterfront Way/Hop House island

Development should have regard to and respect the following important views and vistas:

Panoramic Views (view cone) in/out of Brierley Hill:

- PV1- From Waterfront Way car park, looking eastwards towards St. Andrews Church, Netherton/horizon.
- PV2- From the car park at the rear of Brierley Hill Health & Social Care Centre, looking eastwards towards St. Andrews Church, Netherton/horizon.
- PV3- From Church Hill/Brierley Hill War Memorial, looking south west.
- PV4- From Mill Street/canal bridge looking southwards overlooking Dudley No. 1 Canal/Delph Nine Locks
- PV5- From the churchyard/St. Michaels looking west towards the Chimney of the former Stevens & Williams Glassworks, Woodcock Mews
- PV6- From the green in front of the Brierley Hill Civic Hall and Police Station looking southwest towards the Chimney of the former Stevens & Williams Glassworks, Woodcock Mews

Skyline Views:

- SK1- From The Embankment looking southwest towards the high-rise flats at Brierley Hill
- SK2- From Amblecote Road/A4100/B4172 island, looking towards the high-rise flats at Brierley Hill from the south
- SK3 & 4- From Amblecote Road looking towards the high-rise flats at Brierley Hill from the south

Policy DLPBH2 - Brierley Hill Design - Landmarks, Views, Vistas and Gateways

- SK5- From Turner's Lane looking towards the high-rise flats at Brierley Hill from the south.

Strategic View:

- SV1- From the Level Street/Dudley Road/High Street junction looking south along the High Street towards the high-rise flats at Brierley Hill
- SV2- From Merry Hill Bus Station looking west towards the high-rise flats at Brierley Hill
- SV3- From The Boulevard looking northwest towards the high-rise flats at Brierley Hill

Vista:

- V1- Waterfront east, both directions: east to west and west to east
- V2- Waterfront west, both directions: east to west and west to east

Local View:

- LV1- From Waterfront Way looking west towards The Landmark building
- LV2- From Waterfront Way looking east towards The Landmark building
- LV3- From Waterfront West looking north towards The Landmark building
- LV4- From Waterfront Way looking southwest towards the Hop House
- LV6- From Level Street looking southwest towards the Brierley Hill Health & Social Care Centre
- LV7- From The Embankment looking northwest towards the Hop House
- LV8- From The Embankment/Central Way island looking west towards the Brierley Hill Health & Social Care Centre
- LV9- From The Embankment looking northwest towards the Brierley Hill Health & Social Care Centre
- LV10- From Level Street looking west towards the Brierley Hill Civic Hall & Police Station
- LV11- From Venture Way (as you turn off Level Street) looking southeast towards the Brierley Hill Health & Social Care Centre
- LV12- From Cottage Street, junction with Venture Way, looking west towards the rear of Brierley Hill Market Hall
- LV13- From High Street, looking north towards the front of Brierley Hill Market Hall
- LV14- Along Albion Street, looking north towards the Brierley Hill Civic Hall & Police Station
- LV15- From the junction of Fenton Street/Moor Street looking eastwards towards five ways junction & the former Marsh & Baxters building at 94 High Street
- LV16- From Bell Street, looking south towards St. Michael's Church
- LV17- From Venture Way, by the Brierley Hill Health & Social Care Centre, looking southwards towards Dudley College Inspired
- LV18- From Venture Way, junction with Mill Street, looking northeast towards Dudley College Inspired
- LV19- From Level Street bridge over Dudley No. 1 Canal, looking north towards Hop House/The Waterfront buildings complex
- LV20- From Level Street bridge over Dudley No. 1 Canal, looking south over the canal towards Daniels Wharf & the High Plateau
- LV21- From Church Street, looking northeast towards St Mary's Church
- LV22- From Church Street, looking northwest towards St. Michael's Church

Policy DLPBH2 - Brierley Hill Design - Landmarks, Views, Vistas and Gateways

- LV23- From Church Street, looking southwest towards Brierley Hill War Memorial
- LV24- From Church Street, looking northeast towards Brierley Hill War Memorial
- LV25- From Church Street looking northeast to the main entrance gates Marsh Park/ Brierley Hill War Memorial & no. 18 Church Hill
- LV26- From A4100 road bridge (Nine Locks Bridge) looking northwards, overlooking Dudley No. 1 Canal

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH2	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.2.2.1 Policy DLPBH2 aims to conserve the identity and character of Brierley Hill Strategic Centre through identifying key landmarks that should be protected and enhanced and provides requirements to ensure high quality designs are pursued.

E.2.2.2 Policy DLPBH2 will *"protect key gateway buildings that give the town character"* and ensure *"such landmarks should not be overwhelmed by new development"*. The policy identifies a range of specific views and landmarks to consider, some of which relate to Listed Buildings. Therefore, the policy would be expected to have a minor positive impact on cultural heritage (SA Objective 1). However, the policy would benefit from stronger wording, referring to *"heritage assets"* and their settings where applicable in relation to the identified landmarks, in accordance with the NPPF. Stronger referencing to cultural heritage throughout the policy would be beneficial and ensure that cultural heritage is being pursued throughout strategic objectives within the Local Plan.

E.2.2.3 The policy seeks to ensure that the choice of materials and finishes for new buildings is carefully considered in order to protect and enhance the existing design context, as well as any potential effects on views and skylines. A minor positive impact can therefore be expected for landscape character (SA Objective 2).

E.2.3 Policy DLPBH3 – Public Realm in Brierley Hill

Policy DLPBH3 - Public Realm in Brierley Hill

The Primary Public Spaces identified on the Brierley Hill Inset Plan Policies Map will:

- give priority to the convenience, enjoyment, and safety of pedestrians
- have active built edges that front the space
- incorporate well-designed street furniture, and hard and soft landscaping
- function as a meeting space; and, as appropriate, be designed to be able to accommodate events

Policy DLPBH3 - Public Realm in Brierley Hill

The Primary Thoroughfares identified on the Brierley Hill Inset Plan Policies Map will be delivered and existing thoroughfares will be safeguarded and where necessary, upgraded. All thoroughfares must be designed with pedestrians and, as appropriate, cyclists foremost in mind and respect natural desire lines. Primary Thoroughfares will be required to:

- a. make a simple and relatively direct connection between the points indicated
- b. make provision for safe pedestrian movement and crossing including provision for people with restricted mobility
- c. incorporate pedestrian crossing facilities in all traffic signal controlled junctions where feasible and be designed as attractive, usable and memorable spaces
- d. be defined by elevations which are appropriately scaled to the width of the thoroughfare and offer relatively continuous active frontage
- e. be well overlooked by building frontages to assist natural surveillance
- f. display a consistent quality of design with street surfaces, lighting, street furniture, signs, hard and soft landscaping. Street clutter must be avoided.
- g. provide for high quality integrated landscape and biodiversity as an integral part of the design
- h. offer continuous and twenty-four-hour access to pedestrians.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLPBH3	0	+	+	0	0	0	0	0	+	0	+	+	0	0

E.2.3.1 Policy DLPBH3 will ensure street clutter is avoided and a high quality, integrated landscape is provided, to create a vibrant public realm in Brierley Hill. A minor positive impact on landscape can be expected (SA Objective 2).

E.2.3.2 This policy promotes good transport links, specifically with regard to pedestrian and cyclist provisions. The policy states that *"thoroughfares must be designed with pedestrians and, as appropriate, cyclists foremost in mind"*. The policy would be expected to have minor positive impacts on transport and health due to the encouragement of active travel and associated health benefits (SA Objectives 9 and 12). The policy states that these thoroughfares will ensure *"biodiversity as an integral part of the design"*, with potential to result in a minor positive impact on biodiversity and habitat connectivity within the town (SA Objective 3).

E.2.3.3 A minor positive impact on equality (SA Objective 11) is likely as new developments will *"give priority to the convenience, enjoyment, and safety of pedestrians"*.

E.2.4 Policy DLPBH4 – Green Infrastructure in Brierley Hill

Policy DLPBH4 - Green Infrastructure in Brierley Hill

- A minimum of 5000 new trees will be planted within the Brierley Hill Inset Plan area during the plan period up to 2041.
- The following areas will be a focus for new tree planting as well as other green infrastructure enhancements, which shall also include nature recovery measures in appropriate locations and in accordance with the provisions of Policies DLP29, DLP31 and DLP32.
- Within the designated Wildlife Corridors – Wildlife Corridors shall be no less than 10m wide, unless, through an assessment of a development proposal, this is evidenced as impractical to achieve and compensatory nature conservation enhancement measures are provided elsewhere within the inset plan area.
- Within designated Sites of Local Importance for Nature Conservation (SLINCs).
- Within Primary Public Spaces and along Key Pedestrian Links.
- Alongside Pedmore Road, including the formation of a new entrance to Saltwells National Nature Reserve (NNR) and a footpath link within Saltwells Wood, on the eastern side of the carriageway.
- Within a green corridor between the proposed Midland Metro Stop at Canal Street and Fens Pool Local Nature Reserve (LNR)/Special Area of Conservation (SAC).
- Within Brierley Hill High Street, with a focus on additional tree planting.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH4	0	+	++	+	+	0	+	0	0	0	0	+	0	0

E.2.4.1 Policy DLPBH4 seeks to improve the quality and extent of GI and wildlife corridors within Brierley Hill. By ensuring a minimum of 5,000 new trees will be planted within Brierley Hill, the tranquillity rating of the area is likely to improve as well as the existing landscape character. A minor positive impact is likely for SA Objective 2.

E.2.4.2 Policy DLPBH4 will adhere to provisions set out in Policies DLP31 and DLP32, and sets out requirements to ensure designated biodiversity assets are conserved and that ecological links are improved, which would help to improve habitat provision and connectivity. A major positive impact on biodiversity can be expected (SA Objective 3). It is recommended that wording is added to the policy to ensure that the newly planted trees will be preferably native species and that the location of trees is informed by an assessment carried out by a qualified ecologist / arboriculturist. The long-term management of the trees should be ensured.

E.2.4.3 Improving the GI and tree cover within Brierley Hill will help with climate change mitigation and adaption. The significant increase in tree cover will help to reduce some forms of pollution due to carbon sequestration. This would benefit local residents as they would be exposed to less air pollutants and improved air quality. Therefore, the policy could potentially have a minor positive impact on climate change mitigation, climate change adaptation, air quality and public health (SA Objectives 4, 5, 7 and 12).

E.2.5 Policy DLPBH5 – Conservation and Enhancement of Local Character and Distinctiveness in Brierley Hill

Policy DLPBH5 – Conservation and Enhancement of Local Character and Distinctiveness in Brierley Hill

This policy applies to all development proposals in the Brierley Hill Inset boundary.

- a. Should take account of the locally distinctive character of the area in which they are to be sited and should respect and respond to its positive attributes.
- b. Physical assets (buildings, sites or areas together with their settings) whether man-made or natural that positively contribute to the local character and distinctiveness of Brierley Hill’s landscape and townscape should be retained and wherever possible enhanced and their settings should be respected.
- c. New development in Brierley Hill should be designed so as to reinforce and enhance local distinctiveness and full reference should be made in Design and Access Statements accompanying planning applications to the Brierley Hill Urban Historic Landscape Characterisation and the Urban Design Guidelines in Appendix 3 of that document.
- d. Design and Access Statements should clearly set out the steps that have been taken to achieve locally responsive outcomes through either traditional or more contemporary design solutions.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH5	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.2.5.1 Policy DLPBH5 looks to conserve the historic character of Brierley Hill and protect the character and appearance of the local landscape and townscape. Development proposals should not only take account of the town’s distinctive and historic character, but they should also “*respect and respond to its positive attributes*”. Under the policy, new development would be required to “*reinforce and enhance local distinctiveness*”. A minor positive impact can therefore be expected for cultural heritage and landscape (SA Objectives 1 and 2).

E.2.5.2 Stronger wording on “*physical assets*” and providing clarification on what these assets are would benefit the policy, including whether this encompasses heritage assets. It is recommended to use the term “*heritage assets*” which reflects the wording in the NPPF¹. Cross-reference could be made to historic environment policies within the DLP.

¹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 09/10/23]

E.2.6 Policy DLPBH6 – Brierley Hill High Street and Delph Nine Locks Conservation Areas

Policy DLPBH6 – Brierley Hill High Street and Delph Nine Locks Conservation Areas

- Planning applications for sites and premises within the conservation areas will be determined with particular reference to the relevant Conservation Area Character Appraisal, Management Plan and Historic Landscape Characterisation. The Council will safeguard and seek to enhance the special architectural or historic interest of the conservation areas by:
 - a. resisting the loss of historic fabric/buildings, including landscape
 - b. encouraging the reinstatement of architectural detail
 - c. seeking a high quality of design in new development and to the public realm
- The Council will encourage new development within the Brierley Hill High Street Conservation Area where it will reinforce historic townscape character by:
 - a. removing buildings that have a negative impact on the area
 - b. providing sensitive infilling that respects prevailing height, form, building line, plot rhythm, proportions and fenestration
 - c. making use of traditional building materials, such as red brick and blue slate or complementary new materials that contribute positively to local distinctiveness

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH6	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.2.6.1 Policy DLPBH6 will “safeguard and seek to enhance the special architectural or historic interest” sites within Brierley Hill High Street and Delph Nine Locks Conservation Areas and encourage new developments that will “reinforce historic landscape character” within these areas. Planning applications for sites within conservation areas will be assessed against the relevant Conservation Area Character Appraisal and Management Plan, as well as the HLC. A minor positive impact can therefore be expected for cultural heritage and landscape character (SA Objectives 1 and 2).

E.2.7 Policy DLPBH7 – Sustainable Transport and Active Travel in Brierley Hill Strategic Centre

Policy DLPBH7 - Sustainable Transport and Active Travel in Brierley Hill Strategic Centre

Key schemes and priorities for sustainable transport improvements within Brierley Hill Strategic Centre are identified on the Policies Map and Plan DLP BH4. Development proposals within the centre should ensure alignment with these schemes and provide connections to them to ensure opportunities for sustainable and active travel are maximised. Key schemes and priorities within the Inset Plan area are:

Policy DLPBH7 - Sustainable Transport and Active Travel in Brierley Hill Strategic Centre

- Metro route, stops and terminus and associated active travel improvements (including additional cycleways as detailed below).
- New cycleway links including along the A461 Corridor linking towards Stourbridge and Dudley with connections to Moor Street, Mill Street and Level Street catchment areas.
- New cycleway links along the A4036 Corridor linking Brierley Hill town centre to surrounding residential and employment catchment areas.
- Improvement and connectivity to Sustrans National Cycle Network (NCN) 54 and Dudley No. 1 Canal.
- The Geotrail Walking Route follows the Dudley No. 1 Canal (north) towards Dudley via hop on/hop off metro links or from the canal (southeast) across to Quarry Bank Park and Quarry Bank Local Shopping Centre, and southwest to the Withymoor Playing Fields.
- Improved connectivity to the Wednesbury-Brierley Hill Metro Corridor and associated metro stops.
- Internal town centre connectivity linking Brierley Hill High Street area to Merry Hill Shopping Centre and The Waterfront.
- Improved links to and within Saltwells National Nature Reserve and to Buckpool, Fens Pools and Barrow Hill Local Nature Reserve, also onward connections to Smestow Valley (northwest) and Netherton Park/Bumble Hole Local Nature Reserve (east).

Regard should be had to active travel links beyond the Strategic Centre Inset Plan area, including proposed cycle routes along the A461 (linking Stourbridge and Dudley town centres).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH7	0	0	0	+	0	0	+	0	++	0	0	+	+	0

E.2.7.1 Policy DLPBH7 sets out key schemes and priorities regarding sustainable transport and active travel within Brierley Hill Strategic Centre, including new and improved cycling and walking routes as well as links to popular destinations. A major positive impact on transport and accessibility would be likely (SA Objective 9).

E.2.7.2 Maximising sustainable and active travel would help to reduce reliance on private vehicles and could potentially contribute towards reductions in air pollution as well as GHG emissions associated with road transport. As such, Policy DLPBH7 could potentially have a minor positive impact on SA Objectives 4 and 7.

E.2.7.3 A reduction in air pollution would also benefit local residents as they would be exposed to less air pollutants and improved air quality. Furthermore, encouraging the uptake of active travel will likely increase the activity of residents, with associated benefits to both mental and physical health. Therefore, the policy would be expected to have a minor positive impact on health (SA Objective 12).

E.2.7.4 Improving the transport network within Brierley Hill (in particular via active transport routes) will be likely to increase footfall around Merry Hill Shopping Centre and The

Waterfront. The policy could therefore be expected to have a minor positive impact on the economy (SA Objective 13).

E.2.8 Policy DLPBH8 – Residential Growth in Brierley Hill

Policy DLPBH8 – Residential Growth in Brierley Hill

Sufficient land will be provided to deliver up to 1888 new dwellings within the Brierley Hill Strategic Centre Inset Plan area during the plan period up to 2041.

Residential development shall be the appropriate use on the following Housing Sites, as identified as residential development allocations on the Brierley Hill Inset Plan Policies Map, with other uses being unacceptable, unless they are small in scale and necessary to support residential-led development:

- a. Land at Waterfront Way and Level Street (Priority Site)
- b. The Embankment / Daniels Land (Priority Site)
- c. Level Street/Old Bush Street
- d. Harts Hill, east of Dudley Road
- e. Waterfront Way West
- f. Canal Walk South, Mill Street
- g. Land at Moor Street
- h. Land at Bell Street and High Street
- i. Oak Court Car Park, Dudley Road
- j. Old Carriage Works, Mill Street

Proposed residential development within the Inset Plan area shall offer a range of house types and tenures, in accordance with the provisions of Policies DLP10, DLP11, DLP12 and DLP28 of this plan.

Proposed residential development on the Housing Sites shall accord with the detailed provisions, development and design parameters for each Housing Site.

Residential development across the Inset Plan area will be required to contribute to infrastructure provision in line with policy DLP6, to be assessed on a site by site basis dependent upon the latest analysis at the time.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH8	0	0	0	+/-	+/-	+/-	+/-	+/-	++	++	+	+	+	+

E.2.8.1 Policy DLPBH8 set out the overall strategy for the delivery of new homes within Brierley Hill. This relates to the following site allocations which have been assessed within the SA as reasonable alternative sites (see **Appendix C**) and where applicable (i.e. for those which relate to Opportunity Sites or Priority Sites) within this appendix as site policies:

- DLPBHPS1 – Land at Waterfront Way and Level Street (Priority Site)
- DLPBHPS2 – The Embankment / Daniels Land (Priority Site)

- DLPBHH004 – Level Street/Old Bush Street
- DLPBH006/DLPBH007 – Harts Hill, east of Dudley Road
- DLPBHH002 – Waterfront Way West
- DLPBHH003 – Canal Walk South, Mill Street
- DLPBHH001 – Land at Moor Street
- DLPBHH010 – Land at Bell Street and High Street
- DLPBHH008 – Oak Court Car Park, Dudley Road
- DLPBHH009 – Old Carriage Works, Mill Street

E.2.8.2 Together these sites would be expected to deliver a significant amount of new dwellings and, in accordance with Policy DLPBH8, will offer a range of housing types and tenures. A major positive impact on housing and a minor positive impact on equality would be likely (SA Objectives 10 and 11).

E.2.8.3 Owing to the central location of the proposed housing growth, a major positive impact on transport (SA Objective 9) and a minor positive impact on access to healthcare, employment opportunities and schools (SA Objectives 12, 13 and 14) would be likely.

E.2.8.4 This policy also aims to protect heritage, landscape and biodiversity by suggesting Opportunity Sites meet plan regulations surrounding boundaries and constraints. This could potentially mitigate any adverse impacts development may have on cultural heritage, landscape and biodiversity. A negligible impact would therefore be expected for SA Objectives 1, 2 and 3.

E.2.8.5 The overall impact on climate change mitigation and adaptation, natural resources, pollution and waste will depend upon implementation including the site-specific layout, design and incorporation of adaptive technologies, when considered against the large scale of growth proposed. The overall impact of the proposed development on SA Objectives 4, 5, 6, 7 and 8 is therefore uncertain.

E.2.9 Policy DLPBH9 – Office and Employment Uses in Brierley Hill

Policy DLPBH9 - Office and Employment Uses in Brierley Hill

Proposed development within the following Office and Employment Areas, as designated on the Brierley Hill Inset Plan Policies Map, shall be in accordance with the uses set out within this policy as being appropriate to a particular area. Proposed development for a use which is not acceptable to a particular designated area will be rejected unless it can be successfully evidenced as being subsidiary to, and, in support of an acceptable use.

- a. Woodside Local Employment Area – appropriate uses: those uses set out within Policy DLP19 of this plan, as being appropriate to Local Employment Areas
- b. Waterfront West Office Park – acceptable uses E(g) (i) (Offices); F1(a) (Education)
- c. Waterfront West Business Park – appropriate uses: E(g) (Offices, Research and Development facilities and light industrial development); B8 (Storage and Distribution); F1(a) (Education)
- d. Waterfront East Office Park – acceptable uses at first floor and above E(g) (i) (Offices)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBH9	0	0	0	0	0	0	0	0	0	0	0	0	+	+

E.2.9.1 Policy DLPBH9 sets out appropriate types of development, including offices and research and education facilities, which will be supported within existing employment areas in Brierley Hill. An improved supply of employment and educational buildings would be expected to result in a minor positive impact on the economy and education (SA Objectives 13 and 14), increasing the number of job and training opportunities.

E.2.10 Policy DLPBHPS1 – (Priority Site) Land at Waterfront Way and Level Street

Policy DLPBHPS1 – (Priority Site) Land at Waterfront Way and Level Street

[See DLP for sites plan]

This site will be allocated for residential redevelopment. The site could deliver a minimum of 600 dwellings.

Delivery phasing of dwellings:

- Residential development, in accordance with Policy DLP28. Indicative capacity of a minimum of 600 dwellings, but this is not a cap and capacity could vary depending on type and mix of housing provided.
- Proposals to take account of and complement the Metro route, stations and associated public realm provision.

2033/2034 – 2037-2038 – 300 dwellings

2038/2039 – 2040/2041 – 300 dwellings

This policy sets out the spatial framework and specific policy requirements – other standard policy requirements will also apply set out in the DLP and other Local Plan documents.

The site is in private ownership.

Impact on infrastructure provision:

- School place impacts –
 Analysis suggests that education infrastructure needs arising from the DLP growth are likely to be accommodated via expansions to the current school estate as opposed to the creation of new school(s). However, due to the DLP plan period extending beyond current education forecasts this analysis would be ongoing, and contributions may be required.
- Health –
 Analysis suggests that additional GP consulting rooms maybe required as a result of residential growth in Brierley Hill, therefore contributions maybe required to support this service provision on a site by site basis
- Highways impacts –
 The site is highly accessible and has direct access to numerous alternatives to private car use, any proposals must provide high quality access to active modes of travel. Vehicular access is available off

Policy DLPBPS1 – (Priority Site) Land at Waterfront Way and Level Street

Waterfront Way and Level St. The number of access points required, and their design should be subject to further detailed transport assessment (that has been scoped and developed in consultation with the Council) and is dependent upon the nature of any proposed development scheme. Regard should be had to the impact of the Metro Route and its associated Station at the Waterfront, including any remodelling of the road layout on or around the site to facilitate the delivery of the Metro and safeguard the route for future extension.

A key part of the site layout should be connections to the cycling and walking network within and around the strategic centre.

- Biodiversity net gain –

There are no designated nature conservation assets on this site. Policy DLP31 and DLP32 will apply.

- Open space requirements –

It will be necessary for the site to provide areas of open space that connect the development to the surrounding areas and connect to good-quality walking and cycling routes that provide access to the nearby Canal network.

- Drainage –

Sustainable drainage systems that are sufficient to achieve greenfield runoff rates should be provided for the site, in accordance with Policy DLP43 and be approved by the LLFA.

- Other considerations –

Due to the sites elevated location views into and out of the site should be considered as well as how the site responds to its wider surroundings and key views, including Panoramic Views 1 (PV1) and 2 (PV2) towards Netherton's Historic Church, St Andrews, and Vista 3 (V3) and Local Views 1 (LV1) and 4 (LV4)

- Historic Environment –

The site is currently a large surface carpark created for the Waterfront Development c.1997. It is located in Major Character Zone *Pensnett Chase* and within Brierley Hill Character Zone 9 '*Merryhill Shopping Centre*'. Located to the north and west of this opportunity site is the Dudley No.1 Canal which is an Area of High Historic Townscape Value (AHHTV) and Archaeological Priority Area (APA) consideration therefore needs to be given to any potential impacts on their setting and significance. The land in the north of this site is higher than that in the south. The two areas were exploited differently in the past. The lower lying land (in and around Engine Lane) was occupied by collieries (there are two recorded mine shafts in this area) whilst on the higher ground stood the Level New Furnaces (HER 7837). For further information refer to the Brierley Hill HLC.

- Design principles –

New development at this location will represent higher density development (likely to be a minimum of 95dph but parts of the site would be appropriate for even higher density development). New development should be perimeter blocks that clearly define public and private spaces. Any parking provided should be in the courtyard within the perimeter blocks or upper floors of multi-storey car park. All development should create active ground floor frontages facing any public realm and proposed Metro infrastructure. All new development should create a network of streets and spaces in line with the planning policies on Public Thoroughfares and Primary Public Spaces. Existing trees, ecology and watercourses should be protected and enhanced and incorporated into the proposed site layout. Building height will be assessed during detail design or planning application stages.

Developments should ensure that the layout and design is informed by a Landscape and Visual Impact Assessment (LVIA) / Landscape Visual Appraisal (LVA)

Policy DLPBHPS1 – (Priority Site) Land at Waterfront Way and Level Street

To ensure permeability, the layout should connect to the surrounding roads, pedestrian routes, and metro station. Additionally, the layout must also incorporate areas reserved for Midlands Metro Alliance (MMA) and the metro station.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBHPS1	+	+	+	-	-	-	-	-	++	++	0	+	++	0

- E.2.10.1 Policy DLPBHPS1 sets out the preferred site allocation at 'Land at Waterfront Way and Level Street', which has been assessed in the SA as Site DLPBHPS1 alongside other reasonable alternative sites (see **Appendix C**). This Priority Site will supply a minimum of 600 new dwellings and so will be likely to have a major positive impact on housing within Dudley (SA Objective 10).
- E.2.10.2 Policy DLPBHPS1 sets out a requirement for good transport links that make the site highly accessible by public transport and active travel routes. The policy states that *"a key part of the site layout should be connections to the cycling and walking network within and around the strategic centre"* and additionally includes measures to ensure strong links to the metro and that the site is highly accessible through a transport assessment that is required based on the proposed development. Site DLPBHPS1 has strong links to surrounding healthcare, located within 5km of the Russells Hall Hospital and is located within sustainable walking distance to healthcare facilities, although is located beyond a sustainable travel time to healthcare facilities by public transport. The transport measures included within the policy would increase accessibility to local services such as healthcare. Overall, a major positive impact would be expected on transport and accessibility (SA Objective 9) and a minor positive impact could be expected on health (SA Objective 12).
- E.2.10.3 The site is located within sustainable travel time of nearby employment sites and would therefore have a major positive impact on residents' access to employment opportunities (SA Objective 13).
- E.2.10.4 The policy seeks to ensure that *"the site responds to its wider surroundings and key views, including ... towards Netherton's Historic Church"*, and that the development identifies and addresses any potential impacts on the surrounding Character Zones. This would help to safeguard Dudley's historical heritage and townscape character. The requirement to carry out a LVIA / LVA to inform the layout and design of development would also help to ensure that potential effects on landscape are identified and considered. The proposed redevelopment of the current Waterfront car park on the site could potentially improve the appearance and character of the local area. Overall, a minor positive impact on heritage assets and local landscape could be achieved (SA Objectives 1 and 2).

- E.2.10.5 Site DLPBHPS1 is located outside of sustainable walking distance to schools, although it is located within a sustainable travel time via public transport to secondary schools. The policy states that education needs analysis is ongoing and contributions may be required. Based on the current information, a negligible impact on education has been recorded (SA Objective 14).
- E.2.10.6 Policy DLPBHPS1 could potentially have a minor positive impact on biodiversity (SA Objective 3) in the long term, as the minimum 10% BNG requirement² will help to ensure habitat enhancement and diversification of species increases.
- E.2.10.7 The site is located on areas of high surface water flood risk and could potentially locate some residents in areas of high risk of flooding. Although the policy includes measures to mitigate flood risk such as GI and drainage strategies, a minor negative impact on climate change adaptation can be expected (SA Objective 5).
- E.2.10.8 All new developments have potential to create an increase in pollution and waste production, to some extent. Despite the proposed public transport enhancements within the policy, and sustainable waste management measures in other DLP policies, since Policy DLPBHPS1 proposes a minimum of 600 new dwellings, this could potentially lead to a minor negative impact on pollution and waste (SA Objectives 7 and 8). This policy would benefit from the addition of some pollution and waste mitigation strategies. The policy includes measures to discourage private car use and encourage more sustainable transport methods, the policy states that *"a key part of the site layout should be connections to the cycling and walking network within and around the strategic centre"*. The policy additionally requires a transport assessment to be carried out dependent on the proposal, this would be expected to increase accessibility to the site and surrounding transport networks. Overall, despite these policy measures the site would still be likely to have a minor negative impact on the carbon footprint of the area (SA Objective 4) due to the large increase in the local population.
- E.2.10.9 The site is located on previously developed land. However, the site does contain large areas of trees and scrub that could be lost or damaged as a result of the proposed development. Overall, a minor negative impact on natural resources is expected on the land at the site (SA Objective 6).
- E.2.10.10 The policy proposes the development of 600 dwellings, which could potentially include affordable homes. The site is located within the most deprived 10% of LSOAs in England, located in Dudley 022C³ and without careful planning, further development in the area could exacerbate existing inequalities. Overall, a negligible impact on equality would be expected (SA Objective 11).

² The Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents> [Date accessed: 07/08/23]

³ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 11/08/23]

E.2.11 Policy DLPBHPS2 – (Priority Site) The Embankment / Daniels Land

Policy DLPBHPS2 – (Priority Site) The Embankment / Daniels Land

[See DLP for sites plan]

This site will be allocated for residential redevelopment. The site could deliver a minimum of 300 dwellings (indicative capacity which is not a cap).

Delivery phasing of dwellings:

- a. Residential development, in accordance with Policy DLP22. Indicative capacity of a minimum of 300 dwellings, this is not a cap and capacity could vary depending on type and mix of housing provided.
- b. Proposals should take account of and complement the Metro route, stations and associated public realm provision.

2028/2029 – 2032/2033 – 150 dwellings

2033/2034 – 2037/2038 – 150 dwellings

This policy sets out the spatial framework and specific policy requirements – other standard policy requirements will also apply set out in the DLP and other Local Plan documents.

The site is in private ownership.

Impact on infrastructure provision:

- School place impacts –

Analysis suggests that education infrastructure needs arising from the DLP growth are likely to be accommodated via expansions to the current school estate as opposed to the creation of new school(s). However due to the DLP plan period extending beyond current education forecasts this analysis would be ongoing, and contributions may be required.

- Health –

Analysis suggests that additional GP consulting rooms maybe required as a result of residential growth in Brierley Hill, therefore contributions maybe required to support this service provision on a site by site basis.

- Highways impacts –

The site is highly accessible and has direct access to numerous alternatives to private car use, any proposals must provide high quality access to active modes of travel. Vehicular access is available off Level Street, Venture Way and The Boulevard. The number of access points required, and their design should be subject to further detailed transport assessment (that has been scoped and developed in consultation with the Council) and is dependent upon the nature of any proposed development scheme. Regard should be had to the impact of the Metro Route and its associated Station at The Embankment, including any remodelling of the road layout on or around the site to facilitate the delivery of the Metro and safeguard the route for future extension.

A key part of the site layout should be connections to the cycling and walking network within and around the strategic centre.

- Nature Conservation/Biodiversity net gain –

The Dudley No1 Canal runs through this site and is allocated as a SLINC through this section. Regard should be had to nature conservation status of the network at this point and considered in any proposals. Policy DLP31 and DLP32- Biodiversity Net Gain will apply.

- Canal Network –

Proposals should positively respond to and enhance the setting of the canal, proposals that do not address the canal in a positive manner will not be supported. Policy DLP36 will apply.

Policy DLPBHPS2 – (Priority Site) The Embankment / Daniels Land

- Open Space Requirements –

Due to the site’s proximity to the Canal, open space should provide linkages to easily access the towpaths for recreation and active travel.

- Drainage –

Sustainable drainage systems that are sufficient to achieve greenfield runoff rates should be provided for the site, in accordance with Policy DLP46 and be approved by the LLFA. Drainage should not adversely impact the Dudley Canal, and its water quality.

- Historic Environment –

This site is located in Major Character Zone *Pensnett Chase* and falls within two Brierley Hill Character Zones, CZ 2 ‘*Area of modern and late 20th century industrial and commercial development*’ and CZ 9 ‘*Merryhill Shopping Centre*’. Running through the centre of this opportunity site is the Dudley No.1 Canal which is an Area of High Historic Townscape Value (AHHTV) and Archaeological Priority Area (APA), consideration therefore needs to be given to any potential impacts on setting and significance and to the fact that the course of the canal has been altered slightly and that archaeological remains of it may survive within the site. For further information refer to the Brierley Hill HLC.

- Other considerations –

Due to the sites elevated location views into and out of the site should be considered as well as how the site responds to its wider surroundings and key views across the Strategic Centre enhanced where possible. Panoramic View 2 (PV2) towards Netherton’s Historic Church, St Andrews, and Skyline View 1 (SK1), Strategic View 2 (SV2) and Local Views 6 (LV6), 8 (LV8), 9 (LV9) and 20 (LV20) are particularly relevant.

New development should be perimeter blocks that clearly define public and private spaces. Parking should be in the courtyard within the perimeter blocks or upper floors of multi-storey car park. All development should create active ground floor frontages facing any public realm and proposed Metro infrastructure. All new development should create a network of streets and spaces in line with the planning policies on Public Thoroughfares and Primary Public Spaces, where appropriate there is potential to create new pedestrian bridge(s) over the canal to improve connectivity and permeability. Existing trees, ecology and watercourses should be protected and enhanced and incorporated into the proposed site layout. Building height will be assessed during detail design or planning application stages.

Developments should ensure that the layout and design is informed by a Landscape and Visual Impact Assessment (LVIA) / Landscape Visual Appraisal (LVA).

To ensure permeability, the layout should connect to the surrounding roads, pedestrian routes, and metro station at The Embankment, the layout must also incorporate areas reserved for Midlands Metro Alliance (MMA) and the metro station.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBHPS2	+	+	0	0	-	-	-	-	++	++	+	++	++	++

E.2.11.1 Policy DLPBHPS2 sets out the preferred site allocation at ‘The Embankment / Daniels Land’, which has been assessed in the SA as Site DLPBHPS2 alongside other reasonable alternative sites (see **Appendix C**). This Priority Site aims to deliver a minimum of 300

new dwellings and so will have a major positive impact on housing within Dudley (SA Objective 10) and due to the increase in affordable housing a minor positive impact on equality (SA Objective 11).

- E.2.11.2 Policy DLPBHP2 sets out a requirement for good transport links that make the site highly accessible by public transport and active travel routes. The policy states that *"a key part of the site layout should be connections to the cycling and walking network within and around the strategic centre"* and additionally includes measures to ensure strong links to the metro and that the site is highly accessible through a transport assessment that is required based on the proposed development. Increased accessibility would increase the residents access to local services, including healthcare services that the site already has strong links to. Site DLPBHP2 is located within 5km of Russells Hall Hospital and is additionally located within sustainable travel time (by both foot and public transport) of healthcare facilities and local primary and secondary schools. Overall, a major positive impact would be expected on transport and accessibility (SA Objective 9), the health of residents (SA Objective 12), and residents' access to education (SA Objective 14).
- E.2.11.3 Policy DLPBHP2 ensures that considerations are made to *"how the site responds to its wider surroundings and key views"*. The requirement to carry out a LVIA / LVA to inform the layout and design of development would also help to ensure that potential effects on landscape are identified and considered. The site coincides with the 'Dudley No.1 Canal' APA and the 'Dudley No.1 Canal, Delph Locks to Park Head Locks' AHHTV, therefore, the policies measures to *"positively respond to and enhance the setting of the canal"* would be expected to positively contribute to the protection of these heritage assets and their settings. This policy aims to safeguard Dudley's historical heritage and townscape character. Therefore, a minor positive impact on SA Objectives 1 and 2 has been identified.
- E.2.11.4 Biodiversity Net Gain will apply to this site. The minimum 10% BNG requirement⁴ will help to ensure that the number and diversity of species in the area increases. This would need careful management and monitoring to ensure that BNG is successful; this is especially important given that the site coincides with the Dudley No.1 Canal SLINC that would form a key part of the areas ecological network. Policy DLPBHP2 also looks to protect *"existing trees, ecology and watercourses"* and states that *"regard should be had to nature conservation status of the network at this point and considered in any proposals"*. As such, it is anticipated that the developable area of the site will exclude the SLINC; however, the policy would benefit from stronger wording regarding how any development that would be carried out adjacent to the SLINC would minimise its potential impacts. On balance, a negligible impact on biodiversity is identified (SA Objective 3).
- E.2.11.5 The site is located within sustainable travel time of nearby employment sites and would therefore be expected to have a major positive impact on residents' access to employment opportunities (SA Objective 13).
- E.2.11.6 The policy includes measures to discourage private car use and encourage more sustainable transport methods, the policy states that *"a key part of the site layout should be connections to the cycling and walking network within and around the strategic centre"*.

⁴ ibid

The policy additionally requires a transport assessment to be carried out dependent on the proposal, this would be expected to increase accessibility to the site and surrounding transport networks. Overall, despite these policy measures the site would still be expected to have a minor negative impact on the carbon footprint of the area (SA Objective 4) due to the large increase in the local population.

- E.2.11.7 The site is located on previously developed land. However, the site does contain large areas of trees and scrub with underlying soil resources that could be lost or damaged as a result of the proposed development. A minor negative impact on natural resources would be expected (SA Objective 6).
- E.2.11.8 The site is located on areas of high surface water flood risk and could potentially locate some residents in areas of high risk of flooding. Although the policy includes measures to mitigate flood risk such as GI and drainage strategies, a minor negative impact on climate change adaptation can be expected (SA Objective 5).
- E.2.11.9 All new developments have potential to create an increase in pollution and waste production, to some extent. Despite the proposed public transport enhancements within the policy, and sustainable waste management measures in other DLP policies, since Policy DLPBHPS2 proposes circa 300 new dwellings, this could potentially lead to a minor negative impact on pollution and waste (SA Objectives 7 and 8). This policy would benefit from the addition of some pollution and waste mitigation strategies.

E.2.12 Policy DLPBHOS1 – Brierley Hill Strategic Centre Opportunity Site: Brierley Hill Civic Core

Policy DLPBHOS1 – Brierley Hill Strategic Centre Opportunity Site: Brierley Hill Civic Core

Acceptable Land Uses

Proposed development within this Opportunity Site, as designated on the Brierley Hill Inset Plan Policies Map, shall be in accordance with the uses set out within this policy as being acceptable. Proposed development for a use which is not acceptable to this Opportunity Site will be rejected unless it can be successfully evidenced as being subsidiary to, and, in support of an acceptable use.

Mixed use development including:

- a. Class F1 uses – learning and non-residential institutions,
- b. Class F2 uses – local community,
- c. Sui Generis uses – theatres, venues for live performance, cinemas, concert halls, bingo halls and dance halls.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBHOS1	-	0	+	+/-	-	-	-	+/-	0	0	0	++	+/-	+

- E.2.12.1 Policy DLPBHOS1 sets out the preferred allocation for the Site 'Brierley Hill Civic Core', which has been assessed within the SA process as a reasonable alternative site known as DLPBHOS1. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.2.12.2 The site is proposed for F1, F2 and Sui Generis uses and would therefore be expected to have a negligible impact on housing provision (SA Objective 10). Class F1 developments may include educational uses with potential to result in a minor positive impact on education (SA Objective 14). The site is located within the most deprived 10% of LSOAs in England, located in Dudley 022C⁵ and without careful planning, further development in the area could exacerbate existing inequalities. The policy would be expected to have a negligible impact on equality (SA Objective 11).
- E.2.12.3 The site largely comprises previous developed land, however, there are also some undeveloped areas with green cover. The proposed development at this site could potentially result in the loss of some areas of undeveloped land with environmental value, leading to a minor negative impact on natural resources (SA Objective 6).
- E.2.12.4 The site is located at a distance that would not be expected to significantly impact surrounding biodiversity assets and does not coincide with any identified biodiversity assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPBHOS1 would be expected to have a minor positive impact on local biodiversity (SA Objective 3). The policy would benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.2.12.5 The centralised location of the site ensures strong links to local services, public transport and active modes of travel such as walking and cycling, which could help to reduce reliance on private car use. The site is located in close proximity to public transport and is accessible to local services by foot, however, the site is located beyond the sustainable distance of 2km from the nearest railway station. The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with

⁵ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 11/08/23]

- the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.2.12.6 The site is proposed for F1, F2 and Sui Generis uses, and the potential impacts of this development on the borough's carbon footprint is uncertain (SA Objective 4).
- E.2.12.7 The site is located partially within 'High Street Brierley Hill' CA. The policy should provide wording or cross-reference to other DLP policies to ensure that the CA and its setting will be conserved and enhanced alongside the proposed development. Overall, a minor negative impact would be expected for cultural heritage (SA Objective 1). A negligible impact would be expected in relation to the local landscape, assuming the proposed development remains in keeping with the local landscape character (SA Objective 2).
- E.2.12.8 The site is located within 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The site is additionally located within sustainable travel time to healthcare facilities. Overall, the policy could potentially have a major positive impact on health (SA Objective 12).
- E.2.12.9 The site proposes mixed use developments of Class F1 uses. The proposed development would therefore be expected to have a major positive impact on educational facilities and access to education (SA Objective 14).
- E.2.12.10 The site is located within Dudley AQMA and is located within 200m of the A461 (Venture Way). Measures to avoid or minimise the impacts on air quality could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of enhanced green cover to provide ecosystem services such as carbon sequestration. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).
- E.2.12.11 The site proposes non-residential development, and it would therefore be uncertain as to the extent of waste produced (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.2.12.12 Whilst the site is located within Flood Zone 1, it is located on areas of low and medium surface water flood risk. The policy would benefit from including measures that ensure enhanced green cover and the implementation of adaptive technologies such as SuDS, as well as ensuring that the impacts of climate change are considered including retrofitting of existing buildings on site to be more energy efficient; therefore, cross referencing to Policies DLP43 and DLP46 would be beneficial. Overall, the policy could potentially have a minor negative impact on climate change adaptation (SA Objective 5).
- E.2.12.13 The site currently comprises of a range of employment / commercial floorspace. It is uncertain whether there would be a net change in employment land and job opportunities as a result of the proposed redevelopment of the site within this policy (SA Objective 13).

E.2.13 Policy DLPBHOS2– Brierley Hill Strategic Centre Opportunity Site: The Waterfront East Entertainment Zone

Policy DLPBHOS2 – Brierley Hill Strategic Centre Opportunity Site: The Waterfront East Entertainment Zone

Acceptable Land Uses (at ground floor only)

Proposed development within this Opportunity Site, as designated on the Brierley Hill Inset Plan Policies Map, shall be in accordance with the uses set out within this policy as being acceptable. Proposed development for a use which is not acceptable to this Opportunity Site will be rejected unless it can be successfully evidenced as being subsidiary to, and, in support of an acceptable use.

Mixed use development including:

- a. Class E uses – commercial, business and service uses
- b. Class F2 uses – local community
- c. Sui Generis uses – amusement arcades, nightclubs, casinos, public houses, hot food takeaways (where the provisions of Policy DLP26 can be met), taxi businesses (limited to one within this Opportunity Site), venues for live performances and cinemas

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBHOS2	-	0	-	+/-	-	-	-	+/-	0	0	0	0	+/-	0

E.2.13.1 Policy DLPBHOS2 sets out the preferred allocation for the Site 'The Waterfront East Entertainment Zone', which has been assessed within the SA process as a reasonable alternative site known as DLPBHOS2. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.2.13.2 The site is proposed for Class E, F2 and Sui Generis uses and would be expected to have a negligible impact on housing provision (SA Objective 10). The site is located within the most deprived 10% of LSOAs in England, located in Dudley O22C⁶ and without careful planning, further development in the area could exacerbate existing inequalities. The provision of Class F2 uses and Class E uses proposed in the policy could however benefit equality, and provide increased access to local services. On balance, the policy would be expected to have a negligible impact on equality (SA Objective 11).

E.2.13.3 The site largely comprises previous developed land, however, there are also some undeveloped areas with green cover. The precise developable area of the site is unknown; therefore, it is assumed there may be some loss of undeveloped land with environmental value as a result of the proposed development, leading to a potential minor negative

⁶ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 11/08/23]

- impact on natural resources (SA Objective 6). Furthermore, the site is located adjacent to the 'Dudley No.1 Canal' SLINC. The proposed development at this site could potentially have a minor negative impact on local biodiversity, due to increased development related threats and pressures on the SLINC (SA Objective 3). The policy would benefit from stronger wording relating to the consideration of local biodiversity, whereby cross referencing to relevant DLP policies would be beneficial, such as DLP31 and DLP32.
- E.2.13.4 The centralised location of the site ensures strong links to local services, public transport and active modes of travel such as walking and cycling, which could help to reduce reliance on private car use. The site is located in close proximity to public transport and is accessible to local services by foot, however, the site is located beyond the sustainable distance of 2km from the nearest railway station. The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.2.13.5 As the site is proposed for a mix of non-residential uses, the potential impact on the borough's carbon footprint is uncertain (SA Objective 4).
- E.2.13.6 The site partially coincides with the 'Dudley No.1 Canal, Delph Locks to Park Head Locks' AHHTV. The AHHTV would be expected to positively contribute to the surrounding landscape. The policy should provide wording to ensure that the character of the AHHTV will be conserved and enhanced alongside the proposed development. Overall, a minor negative impact would be expected for cultural heritage (SA Objective 1). A negligible impact on the local landscape would be expected overall, assuming the proposed development remains in keeping with the local landscape character (SA Objective 2).
- E.2.13.7 The site is located within 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The site is however located wholly outside the identified sustainable travel time to healthcare facilities. On balance, the policy could potentially have a negligible impact on health (SA Objective 12). The policy would benefit from referencing relevant DLP transport and health policies to improve the accessibility to healthcare services, including policies such as DLP67 and DLP9.
- E.2.13.8 The site is located within Dudley AQMA and is located within 10m of the Dudley No.1 Canal. Measures to avoid or minimise the impacts on air quality or water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of enhanced green cover to provide ecosystem services such as carbon sequestration and water filtration. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).
- E.2.13.9 The site proposes non-residential development, and it would therefore be uncertain as to the extent of waste produced (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

- E.2.13.10 Whilst the site is located within Flood Zone 1 and away from fluvial flood risk, it is located on areas of low and medium surface water flood risk. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS, as well as ensuring that the impacts of climate change are considered including retrofitting of existing buildings on site to be more energy efficient; therefore, cross referencing to Policies DLP43 and DLP46 would be beneficial. Overall, the policy could potentially have a minor negative impact on climate change adaptation (SA Objective 5).
- E.2.13.11 The site currently comprises of a range of employment floorspace within 'The Waterfront'. It is uncertain whether there would be a net change in employment land and job opportunities as a result of the proposed redevelopment of the site as set out within the policy (SA Objective 13).
- E.2.13.12 The site is proposed for non-residential development and would therefore have a negligible impact on access to education (SA Objective 14).

E.2.14 Policy DLPBHOS3 – Brierley Hill Strategic Centre Opportunity Site: The Venture Way Health and Education Zone

Policy DLPBHOS3 – Brierley Hill Strategic Centre Opportunity Site: The Venture Way Health and Education Zone

Acceptable Land Uses

Proposed development within this Opportunity Site, as designated on the Brierley Hill Inset Plan Policies Map, shall be in accordance with the uses set out within this policy as being acceptable. Proposed development for a use which is not acceptable to this Opportunity Site will be rejected unless it can be successfully evidenced as being subsidiary to, and, in support of an acceptable use.

Mixed use development including:

- a. Class C2 uses – residential institutions,
- b. Class F1 uses – learning and non-residential institutions.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPBHOS3	-	0	+	+/-	-	-	-	+/-	0	+	+	++	+/-	++

- E.2.14.1 Policy DLPBHOS3 sets out the preferred allocation for the Site 'The Venture Way Health and Education Zone', which has been assessed within the SA process as a reasonable alternative site known as DLPBHOS3. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.2.14.2 The site is proposed for Class C2 and F1 uses and would be expected to have a minor positive impact on housing provision (SA Objective 10). The site would provide increased

- access to education and learning facilities and would therefore have a minor positive impact on equality (SA Objective 11).
- E.2.14.3 The site largely comprises previous developed land, however, there are also large undeveloped areas with green cover in the centre of the site. The proposed development at this site could potentially result in the loss of some undeveloped land with potential environmental value. Therefore, a minor negative impact would be expected on natural resources (SA Objective 6).
- E.2.14.4 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPDOS4 could potentially lead to a minor positive impact on local biodiversity (SA Objective 3). The policy would however benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.2.14.5 The centralised location of the site ensures strong links to local services, public transport and active modes of travel such as walking and cycling, which could help to reduce reliance on private car use. The site is located in close proximity to public transport and is accessible to local services by foot, however, the site is located beyond the sustainable distance of 2km from the nearest railway station. The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.2.14.6 The site is proposed for residential institutions, learning and non-residential institutions and as such the potential impact on carbon emissions is uncertain (SA Objective 4).
- E.2.14.7 The site is located in close proximity to 'High Street Brierley Hill' CA, located approximately 17m west of the site. The policy should provide wording or cross-reference to other DLP policies to ensure that the setting of the CA will be conserved and enhanced alongside the proposed development. Overall, a minor negative impact cultural heritage could potentially occur (SA Objective 1). A negligible impact would be expected on the local landscape, assuming the proposed development remains in keeping with the local landscape character (SA Objective 2).
- E.2.14.8 The site is located within 5km of the nearest NHS Hospital, with the nearest being Russell's Hall Hospital. The site is additionally located within a sustainable travel time to healthcare facilities. Overall, the policy could potentially have a major positive impact on access to healthcare facilities (SA Objective 12).
- E.2.14.9 The site is located within Dudley AQMA and is located within 200m of Venture Way (A461). Measures to avoid or minimise the impacts on air quality could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of enhanced green cover to provide

ecosystem services such as carbon sequestration. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).

- E.2.14.10 The policy supports some residential development under Use Class C2 as well as other non-residential uses; however, the extent of waste likely to be produced from this development is uncertain (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.2.14.11 Whilst the site is located within Flood Zone 1, it is located on an area of low surface water flood risk. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS, as well as ensuring that the impacts of climate change are considered including retrofitting of existing buildings on site to be more energy efficient; therefore, cross referencing to Policies DLP43 and DLP46 would be beneficial. Overall, the policy could potentially have a minor negative impact on climate change adaptation (SA Objective 5).
- E.2.14.12 The site currently contains existing development including Brierley Hill Health & Social Care Centre and commercial developments, which may provide some employment opportunities. It is uncertain whether there would be a net change in employment floorspace and job opportunities as a result of the proposed redevelopment of the site as set out within the policy (SA Objective 13).
- E.2.14.13 The policy states that "*Class F1 uses – learning and non-residential institutions*" will be proposed at the site. Such development would be likely to increase access to education in the area. Dudley College lies within the site, and it is assumed this will be retained alongside the redevelopment. Overall, the policy would be expected to have a major positive impact on education (SA Objective 14).

E.3 Dudley Town Centre

E.3.1 Policy DLPD1 – Development in Dudley Town Centre and Town Centre Core Area

Policy DLPD1 – Development in Dudley Town Centre and Town Centre Core Area

The Dudley Town Centre and Town Centre Core Area boundaries are identified on the Dudley Town Centre Inset Plan.

In line with national and local planning policy, any new retail and leisure developments will be directed towards the Town Centre Core Area. Dudley Council will consider the application of planning conditions in relation to any appropriate retail development to ensure the retention of the retail use where considered necessary, relevant and reasonable in terms of meeting strategic planning objectives, particularly in maintaining and enhancing the vitality and viability of the town centre.

Policy DLP24 sets out the policy context for acceptable uses within Dudley Town Centre (Tier Two Centre). The diversification and repurposing of Dudley Town Centre in general will be supported by approving development that enhances the vitality and viability of the centre. Priorities for new and enhanced uses for Dudley Town Centre are identified as:

- a. The provision of additional residential development via redevelopment, change of use or conversion. The re-use of the upper floors of premises for residential will be encouraged through flexibility in the application of guidance and standards relating to amenity and parking provision.
- b. The development of appropriate leisure and tourism facilities to further elevate the towns' position of regional and national importance. Proposals linked to delivery of the Castle Hill Vision will be supported in principle (see also Policies DLP D2 and DLP D7).
- c. The development of additional educational facilities to further enhance the town's existing provision and learning quarters.
- d. The development of appropriate facilities such as restaurants, cafes and drinking establishments, and entertainment venues to enhance the evening economy and complement the leisure and tourism focus of the town.

There is an evidenced qualitative need for an anchor food store within Dudley Town Centre. A specific site for such development is not identified at this time, Dudley Council will keep this under review and will work proactively with landowners and developers to seek to meet this need through reviewing, identifying, and investing in suitable sites within the town centre that may serve to meet this need.

In the case of any edge-of-centre or out-of-centre proposals, unless identified as an acceptable use in the Opportunity Sites, these will only be considered favourably if a 'sequential test' and 'impact assessment' are satisfied (as per Policies DLP24 and DLP27).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD1	0	+	0	0	0	+	0	0	0	+	+	+	++	+

- E.3.1.1 Policy DLPD1 sets out requirements for development within Dudley Town Centre and the Town Centre Core Area. The policy outlines the key developments and aims of the town centre in becoming diversified in terms of uses that promote the vitality and viability of the town centre, with residential, leisure and entertainment use being important in achieving this.
- E.3.1.2 Redevelopment, change of use or conversion will be encouraged to provide additional residential development, resulting in a minor positive impact on SA Objective 10. Utilising existing floorspace and promoting regeneration within the town centre will help to prevent development and use of greenfield sites which can be expected to have a minor positive impact on the local landscape and conserve soil resources (SA Objective 2 and 6).
- E.3.1.3 Policy DLPD1 identifies the need to develop *"additional educational facilities to further enhance the town's existing provision and learning quarters"* as a priority which would be supported. Such development can improve access to education and therefore the policy would be expected to have a minor positive impact on educational opportunities (SA Objective 14).
- E.3.1.4 The development of *"appropriate facilities"* is also identified as a priority, to improve the evening economy and complement the leisure and tourism focus of the town, including restaurants, drinking establishments, cafes, and entertainment venues. In addition, the policy identifies the need to develop an anchor food store. The specifications of Policy DLPD1 would be likely to provide improved employment opportunities and retail developments to boost the local economy as well as human health, by helping to ensure all residents have good access to a range of services and facilities, by providing community uses within centres. Supporting these uses within the centres would also be likely to support vibrant communities and facilitate social cohesion. This policy would be likely to have a minor positive impact in relation to equality and health (SA Objectives 11 and 12) and a major positive impact in relation to economy, through the provision of new jobs in a sustainable and accessible location (SA Objective 13).

E.3.2 Policy DLPD2 – Areas outside the Town Centre Boundary

Policy DLPD2 – Areas outside the Town Centre Boundary

The Castle Hill Vision identifies the potential for the provision of enhanced leisure and tourism provision in the Castle Hill area, including improved links into the town centre (as set out in further detail at Policy DLP D7). Development proposals which help to deliver the Vision will be supported in principle, subject to alignment with Policy DLP D7 (Castle Hill Conservation Area) and all other Local Plan policies.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD2	0	0	0	0	0	0	0	0	0	0	0	+	+	0

- E.3.2.1 Policy DLPD2 supports enhanced leisure and tourism developments within the Castle Hill area of Dudley, which could potentially lead to a minor positive impact on wellbeing and the visitor economy (SA Objectives 12 and 13). It is recommended the policy is expanded or merged with other policies to provide further details.

E.3.3 Policy DLPD3 - Dudley Town Design - Landmarks, Views, Vistas and Gateways

Policy DLPD3 – Dudley Town Design - Landmarks, Views, Vistas and Gateways

All new development should have regard to Policy DLP4, Policy DLP39 and Policy DLP55 to deliver high quality design. Developments within and in the setting of the Conservation Areas should have regard to Policy DLP56.

New development and proposed alterations to existing buildings should:

- a. Enhance the sense of arrival by improving existing gateways and where appropriate create new ones (see also Policy DLP D4).
- b. Create architectural corner features and new landmark features to improve the understanding of the town where appropriate.
- c. Safeguard and enhance local and important views, vistas, landmarks and gateways within and at the edges of the town centre.
- d. Protect key gateway buildings that give the town character and respect building lines, where appropriate, to assist the continuity of the town's heritage and help secure and improve views and vistas.
- e. Respect the height and mass and visibility of existing Dudley landmarks. Such landmarks should not be overwhelmed by new development nor their setting compromised. Consideration of the effect on setting has regard to the importance of the landmark, the extent of any harm, and the benefit arising from development.
- f. Ensure that new buildings have a scale, mass, height and impact that is responsive to its context and sensitive to its roofscape/skyline.
- g. Create variations in roofscape that will respect important local and strategic views.
- h. Ensure that larger development facades and rooflines should reduce their scale and massing by subdividing into smaller architectural elements.

Where new development is likely to have an impact on an identified view, skyline or landmark, accurate visual representations will be required as part of any development proposals. Choice of materials and finishes need careful consideration in order to protect and enhance the existing design context.

The following landmarks, gateways, views and vistas should be protected and enhanced where possible in accordance with the above Policy considerations;

Strategic Landmarks (Positive)

SLP1- Dudley Castle and Zoo and Castle Hill Woodland

SLP2- St Thomas & St Luke Church (Top Church)

SLP3- St Edmund King & Martyr Church (Bottom Church)

Local Landmark (Positive)

LLP1- Priory Ruins (within Priory Park)

LLP2- Dudley College (original campus building) – The Broadway

LLP3- Kudos House – former Dispensary – Ednam Road

Policy DLPD3 – Dudley Town Design - Landmarks, Views, Vistas and Gateways

LLP4- Apollo Fountain – Coronation Gardens

LLP5- Dudley College – “Evolve” building/Former Dudley Fire Station – Tower Street

LLP6- Earl of Dudley Statue – Castle Street

LLP7- Dudley Zoo & Castle entrance – Tecton structure

LLP8- Former Cinema – Castle Hill

LLP9- Station Hotel – Castle Hill / Trindle Road

LLP10- St Thomas of Canterbury RC Church – Trindle Road

LLP11- Metro Pub – Porters Field

LLP12- Dudley Council Offices – Priory Road

LLP13- Dudley Town Hall and 1st World War Commemorative Tower – St James’s Road

LLP14- Dudley Public Library – St James’s Road

LLP15- Saracens Head – Public House & Stone Street Square

LLP16- Former Dudley Museum & Art Gallery – St James’s Road

LLP17- Drinking Fountain & Fountain Arcade – Market Place

LLP18- Former Crown Public House – Wolverhampton Street

LLP19- Copper roofed buildings – Wolverhampton Street

LLP20- Former Post Office – Wolverhampton Street

LLP21- Magistrates Court – Inhedge

LLP22- Former Co-op

LLP23- Ye Olde Foundry Public House

LLP24- Three Crowns Public House – Upper High Street / Stafford Street

LLP25- Former Gypsies Tent Public House

LLP26- Lamp Tavern Public House – Blowers Green Road

Roofscape View

RV1- Inhedge Gardens towards Castle Hill

Edge Gateway

EG1- (Castle Gate Island) Birmingham New Road, Tipton Road and Dudley Southern Bypass/Castle Hill

EG2- (Dudley Interchange) Trindle Road/Hall St/Birmingham St/King St

EG3- (South West Gateway) King St/Upper High Street

EG4- (Flood Street island) Dudley Southern Bypass/Flood Street

EG5- (Priory Road island) Priory Road/Broadway

EG6- Claughton Road North/Pedestrian Bridge over Duncan Edwards Way

Inner Gateway

IG1- Castle Hill/Castle Street

IG2- Bus Station

IG3- Market Place

IG4- Stafford Street/Upper High Street

Policy DLPD3 – Dudley Town Design - Landmarks, Views, Vistas and Gateways

IG5- Ednam Road/Priory Road and/or Ednam Road/The Broadway

IG6- Castle Hill/Birmingham Street

Development should have regard to and respect the following important views and vistas:

Panoramic View (view cone) in/out of Dudley

PV1- Top of Trindle Road looking towards Castle Hill

PV2- Birmingham New Road, Castle Hill looking towards Castle and Hill

PV3- Top of King Street pedestrian bridge to south (Netherton Church & Hill)

PV4- Upper High Street/King Street westwards

PV5- From bridge over Dudley Southern bypass towards castle

PV6- View from St Thomas's Church (Top Church)

Skyline Views:

SK1- From the pedestrian bridge over Duncan Edwards Way looking north east along the ridge of Castle Hill, taking in Dudley Castle and Zoo

SK2- From Tipton Road looking southwest towards Castle Hill

SK3- From Tipton Road looking southwest towards Castle Hill

SK4- From Tipton Road looking southwest towards Castle Hill, Dudley Castle and Zoo

SK5- From Birmingham Road/Castlegate island looking westwards towards Castle Hill, Dudley Castle and Zoo

SK6- From Duncan Edwards Way/approach to Flood Street island looking northwards towards Castle Hill, Dudley Castle and Zoo

SK7- From Stafford Street looking northeast towards Castle Hill, Dudley Castle and Zoo

SK8- From Priory Road island looking eastwards towards Castle Hill, Dudley Castle and Zoo

Strategic View

SV1- Top of Trindle Road looking towards Castle Hill

SV2- Birmingham New Road, Castle Hill looking towards Castle and Hill

SV3- Top of King Street pedestrian bridge to south (Netherton Church & Hill)

SV4- Upper High Street/Queens Cross to St Thomas's Church (Top Church)

SV5- Grazebrook Park & War Memorial Gardens

Vista

V1- Castle Street to New Street

V2- Stone Street to High Street

V3- Lower High Street to Upper High Street

V4- Upper High Street to Stafford Street

V5- Wolverhampton Street to High Street

Local View

5) LV1- Broadway towards College and Castle

6) LV2- Ednam Road towards Castle

7) LV3- New Street/Tower Street towards Castle and Hill

Policy DLPD3 – Dudley Town Design - Landmarks, Views, Vistas and Gateways

8) LV4- Tower Street towards Castle and Hill, including St Edmunds Church (Bottom Church)

LV5- Stepping Stone Street towards St Thomas’s Church (Top Church)

LV6- Bourne Street towards St Edmunds Church (Bottom Church)

LV7- Churchfield Street southwards

LV8- Tipton Road towards the Hill

LV9- Tipton Road towards the Castle and Hill

LV10- Priory Park (Paganel Drive) towards the Castle and Hill

LV11- Priory Road (edge of Coronation Gardens) towards the Castle and Hill

LV12- Castle Hill towards the Castle and Hill

LV13- Castle Hill towards Tecton Structure (former Zoo and Castle Entrance)

LV14- Zoological Drive/turning circle towards the Castle and Hill/Zoo Entrance

LV15- Corner of The Broadway, across Coronation Gardens towards the Council House

LV16- Inhedge Gardens towards Priory House

LV17- Stone Street/Tower Street towards Stone Street Square

LV18- High Street into the Market Place

LV19- New Street/Tower Street towards the Market Place

LV20- New Street/Castle Street into the Market Place

LV21- High Street/King Street towards Queen’s Cross (south west)

LV22- King Street/New Mill Street towards Duncan Edwards Leisure Centre

LV23- King Street/Flood Street towards Flood Street Metro Stop

LV24- King Street/north east corner of The Mambles along King Street (westwards)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD3	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.3.3.1 Policy DLPD3 sets out the requirements for development proposals within Dudley Town regarding landmarks, views, vistas and gateway sites, specifically the design and location of proposals.

E.3.3.2 The policy supports proposals for new buildings or extensions which form “*gateway buildings that give the town character and respect building lines*” and where appropriate, all new developments should “*assist the continuity of the town’s heritage*”. The policy would help to ensure that new development is of an appropriate scale, mass and design for its surroundings, and encourages proposals which would enhance local distinctiveness. Several landmarks, views and vistas are listed within the policy to be protected and

enhanced, some of which are also heritage assets. Overall, the policy would be likely to result in a minor positive impact on the conservation and potential enhancement of the landscape and historic character of Dudley Town (SA Objectives 1 and 2).

E.3.3.3 Development proposals within Dudley Town may include tall buildings, which can significantly alter the image, character and identity of towns and cities⁷. In appropriate locations the development of tall buildings can have a positive contribution to the urban landscape; however, if not in the right place, by virtue of the size of the building, taller developments could potentially harm key aspects of the landscape and historic environment that are valued. It is recommended that the policy ensures designs are informed by a Landscape and Visual Impact Assessment (LVIA)/Landscape Visual Appraisal (LVA) as appropriate.

E.3.4 Policy DLPD4 – Public Realm in Dudley Town

Policy DLPD4 – Public Realm in Dudley Town

The quality of streets and open spaces will be improved through development or local initiatives having regard to the following measures:

- a. The provision of high quality landscaping, floorspace material palette, furniture, lighting, signage and public art to help create a clear identity for the Town Centre.
- b. Mature tree planting and other landscaping will assist the ‘greening’ of the Town Centre and provide multi-functional green links to areas of nature conservation significance.
- c. Streets and spaces will be designed so that pedestrians, cyclists and vehicles can mix safely, with priority given to pedestrians where possible. Ease of movement can be improved by encouraging low-vehicular traffic speeds. Dudley requires additional pedestrian priority areas to improve its sense of identity as a major town centre.
- d. Creating attractive ‘gateways’ to mark and enhance the main approaches to the town centre to achieve a sense of arrival and identity.
- e. Preserving and integrating historic routes into Dudley town centre to enhance its identity, as appropriate and taking account of the requirements for modern development and infrastructure improvements.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD4	+	+	+	0	+	0	+	0	+	0	0	+	0	0

⁷ Historic England (2015) Tall Buildings: Historic England Advice Note 4. Available at: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings/> [Date Accessed: 05/02/21]

- E.3.4.1 Policy DLPD4 aims to improve all the areas within Dudley Town that are accessible to the public (i.e. the public realm) through development and local initiatives.
- E.3.4.2 The policy states that the development proposals and initiatives should “*create a clear identity for the Town Centre*” and create “*attractive gateways*” on approaches. The policy could provide a minor positive impact on the local landscape/townscape by enhancing the character and local distinctiveness of the town centre, helping to create a strong sense of place (SA Objective 2). By seeking to preserve and integrate historic routes into the town centre alongside new developments, the policy could also lead to a minor positive impact on conserving cultural heritage (SA Objective 1).
- E.3.4.3 Initiatives and developments are to consider opportunities to provide “*multi-functional green links*” and planting of mature trees which can be expected to have a minor positive impact on the biodiversity of the town centre through incorporating more space for nature and improving habitat connectivity (SA Objective 3). Enhanced GI coverage within the urban area would also be likely to have benefits in terms of increasing natural cooling, filtration of pollutants and reducing surface water run-off rates, with potential minor positive impacts on climate change adaptation and pollution (SA Objectives 5 and 7).
- E.3.4.4 The policy states that developments and initiatives should be designed to integrate pedestrians, cyclists, and vehicles in a safe manner, “*with priority given to pedestrians where possible*”. The focus on prioritising pedestrians and the idea of integration can strengthen sustainable transport connections within the borough and promote active travel, which in combination with creating a more attractive public realm would be likely to encourage outdoor activity and healthier lifestyle choices. Therefore, the policy can be expected to have a minor positive impact on transport and public health within the borough (SA Objective 9 and 12).

E.3.5 Policy DLPD5 – Conservation and Enhancement of Local Character and Distinctiveness in Dudley

Policy DLPD5 – Conservation and Enhancement of Local Character and Distinctiveness in Dudley

All development proposals:

- Should be designed to reinforce and enhance local distinctiveness. Planning applications will be determined with particular reference to the contents and findings of the Dudley Urban Historic Landscape Characterisation (UHLC);
- Should make full reference in Design and Access Statements and Heritage Statements accompanying development proposals to the Dudley UHLC and to information held in Dudley Council’s Historic Environment Record (HER).
- Should clearly set out the steps that have been taken to sustain features identified in the UHLC as:
 - a. Contributing positively to the quality of the historic environment.
 - b. Resolving issues identified in the UHLC.
 - c. Setting out how development will achieve locally responsive outcomes through either traditional or more contemporary design solutions.

In cases where changes of character or demolition are unavoidable, Dudley Council will seek to ensure that provision is made for an appropriate level of archaeological recording to take place prior to the alteration of the features concerned.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD5	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.3.5.1 Policy DLPD5 aims to conserve and enhance the local character of Dudley through guiding development proposals to ensure that the design will conserve and enhance local identity.

E.3.5.2 The policy states that development proposals *"should be designed to reinforce and enhance local distinctiveness"* and that steps within the proposal should set out how the proposal will sustain features identified in the UHLC, such as *"contributing positively to the quality of the historic environment"*. Through ensuring development proposals consider the findings of the UHLC and seek to respond positively to the existing character, as well as considering implications for archaeological features, the policy can be expected to have a minor positive impact on the local landscape and historic character (SA Objectives 1 and 2).

E.3.5.3 The policy would benefit from stronger wording surrounding heritage assets and specific reference to conserving and enhancing the setting of assets, or through cross-reference to wider historic environment policies such as Policy DLP55.

E.3.6 Policy DLPD6 – Dudley Town Centre Conservation Area

Policy DLPD6 – Dudley Town Centre Conservation Area

Proposed development will be determined with particular reference to the contents and findings of the Dudley Town Centre Conservation Area Appraisal and Management Plan.

Proposals for the inappropriate demolition, alteration or extension of buildings in the Dudley Town Centre Conservation Area, or proposals for works which would be detrimental to its character or setting and which could inappropriately prejudice views into or out of the Conservation Area, will be resisted. Priority will be given to the retention and enhancement of buildings of heritage value identified in the Conservation Area Appraisal.

Proposals to develop or redevelop sites and convert buildings will be required to preserve or enhance the character or appearance of the Conservation Area and contribute positively to the wider regeneration of Dudley Town Centre.

All proposals within the Dudley Town Centre Conservation Area will be required and, where appropriate, enhance the distinctive local character architectural and historic interest of the town centre including buildings, character zones, open spaces and the public realm in particular:

- a. Encouraging the reinstatement of lost architectural detail.
- b. Maintaining viability through the effective reuse of historic buildings, particularly vacant upper floors.
- c. Removing buildings that have a negative impact on the area.

Policy DLPD6 – Dudley Town Centre Conservation Area

- d. Providing infill development that respects prevailing height, form, building line, plot rhythm, proportions and fenestration.
- e. Removing poorly designed shop fronts, outdoor advertisements and signage.
- f. Making use of traditional building materials or complementary new materials that contribute positively to local distinctiveness.
- g. Retaining, enhancing and restoring historic views and vistas identified in the appraisal.
- h. Ensuring that advertising and signage proposals respect the character and appearance of the conservation area in terms of siting, size, number, materials, colours and illumination.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD6	+	++	0	0	0	+	0	0	0	0	0	0	0	0

E.3.6.1 Policy DLPD6 aims to support the Dudley Town Centre Conservation Area through the enhancement and protection of local identity within the area through setting out requirements for development proposals in the local area.

E.3.6.2 Development proposals will face rejection when they are deemed inappropriate within the context of the Dudley Town Centre or are found to be *"detrimental to its character or setting"*. Priority will then be given to proposals that enhance or retain buildings of heritage value that have been identified in the Dudley Town Centre Conservation Area Appraisal. The policy requires proposals to *"enhance the distinctive local character architectural and historic interest of the town centre"* with particular focus on reusing historic buildings and encouraging *"reinstatement of lost architectural detail"*. The policy also includes wording in relation to the regeneration of the Dudley Town Centre and sets out specific requirements for development within the conservation area. Therefore, the policy can be expected to have a major positive impact on the landscape character of the town centre (SA Objective 2). In addition, the policy can also be expected to have a minor positive impact on the conservation of heritage assets and their settings (SA Objective 1).

E.3.6.3 The policy states that proposals will be encouraged to *"maintain viability through the effective reuse of historic buildings, particularly vacant upper floors"*. These measures would be expected to result in a minor positive impact on natural resources within the borough, promoting an efficient use of land and reducing the use of greenfield land (SA Objective 6).

E.3.6.4 The policy would benefit from stronger wording surrounding the heritage assets within the Dudley Town Centre Conservation Area and priorities for heritage-led regeneration in a similar manner to DLPD7. This could include mention of enhancing/repairing Listed Buildings noted on Historic England’s Heritage at Risk Register within the Conservation

Area, 'Church of St Edmund, Castle Street, Dudley'⁸ and 'Parish Church of St Thomas, High Street, Dudley'⁹.

E.3.7 Policy DLPD7 – Castle Hill Conservation Area

Policy DLPD7 – Castle Hill Conservation Area

Planning applications will be determined with particular reference to the contents and findings of the Castle Hill Conservation Area Appraisal. In particular:

- a. Proposals for the inappropriate demolition, alteration or extension of buildings in the Castle Hill Centre Conservation Area, proposals for works which would be detrimental to its character or setting, and proposals which could prejudice views into or out of the Conservation Area will be resisted. Priority will be given to the retention and enhancement of heritage assets identified in the Conservation Area Appraisal.

The Council will safeguard and seek to enhance the special architectural, historical, archaeological, geological, ecological interest and open landscape of the Castle Hill Conservation Area while promoting the development of the area as a visitor attraction by:

- a. Ensuring the significance of Dudley Castle (Scheduled Ancient Monument), including its setting, is not prejudiced and the key views into and out of the Castle Hill Conservation Area are preserved and enhanced.
- b. Encouraging the enhancement of the existing major tourist attractions such as Dudley Castle, Dudley Canal and Caverns, quarried limestone exposures, and the Tecton Buildings and Zoo in a way that respects the highly sensitive character and setting of the Conservation Area.
- c. Encouraging the conservation and enhancement of the Castle Hill Woodlands. This includes developing their potential to be a visitor attraction by supporting improved access to paths and wildlife corridors across the hill, footpath signage, interpretation and management of the Castle Hill Woodland and limestone Ravines and the associated 'mineral railway' paths.
- d. Encouraging reconnection of Castle Hill with Dudley Town Centre via Castle Street in a way that will preserve and enhance the character and appearance of both Conservation Areas and reveal the significance of their shared history.
- e. Encouraging provision of enhanced access to the Sharrington Range and gatehouse within the Castle in order that the historical and architectural significance of the castle ruins can be sustained and appreciated and to develop their value as a tourist attraction.
- f. Encouraging the continuation of the repair and architectural reinstatement works to the Tecton Buildings and their sympathetic reuse.
- g. Ensuring the protection of the geological and manmade historic resources such as the Limestone Caverns and encouraging proposals that would enhance these features as visitor attractions whilst respecting their historic, scenic, geological and nature conservation value and setting within the Conservation Area.

⁸ Historic England (2023) Heritage at Risk: Church of St Edmund, Castle Street, Dudley – Dudley. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/12338> [Date accessed: 29/09/23]

⁹ Historic England (2023) Heritage at Risk: Parish Church of St Thomas, High Street, Dudley – Dudley. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/10007> [Date accessed: 29/09/23]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD7	++	++	+	0	0	0	0	0	+	0	0	0	+	0

- E.3.7.1 Policy DLPD7 provides requirements for development proposals within the Castle Hill Conservation Area, with particular regard to maintaining and enhancing the local character and distinctiveness of the area and the heritage assets located within the area.
- E.3.7.2 The policy states that the Council will *"safeguard and seek to enhance the special architectural, historical, archaeological, geological, ecological interest and open landscape of the Castle Hill Conservation Area"*. The policy will meet this aim by supporting proposals that conserve and enhance local character and provides specific guidance regarding individual historic assets including the 'Dudley Castle' SM which is on Historic England's Heritage at Risk Register¹⁰. In addition to this, the policy states that proposals that will be *"detrimental to its character or setting"* will be resisted. The policy would be expected to provide a major positive impact on the enhancement and retention of the specific landscape distinctiveness and historic assets in the area and will improve awareness and celebration of the historic environment (SA Objective 1 and 2).
- E.3.7.3 The policy encourages development proposals to enhance areas of ecological or geological importance. Therefore, the policy could potentially have a minor positive impact on local biodiversity and geodiversity (SA Objective 3).
- E.3.7.4 The policy outlines requirements of development proposals to improve accessibility to historic assets, achieved by supporting improved footpaths, signage and management that can allow historic assets to become more accessible and more viable as tourist attractions. Therefore, the policy can be expected to have a minor positive impact on accessibility, where active travel would be promoted (SA Objective 9), and potentially on the visitor economy (SA Objective 13).

E.3.8 Policy DLPD8 – Sustainable Transport and Active Travel in Dudley Town Centre

Policy DLPD8 – Sustainable Transport and Active Travel in Dudley Town Centre

Key schemes and priorities for sustainable transport improvements within Dudley town centre are identified on the Dudley Town Transport and Movement Plan and Policies Map. Development proposals within the town centre should ensure alignment with these schemes and provide connections to them to ensure opportunities for sustainable and active travel are maximised. Key schemes and priorities within the Inset Plan area are:

- a. New Interchange.

¹⁰ Historic England (2023) Heritage at Risk: Dudley Castle – Dudley. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/37614> [Date accessed: 09/10/23]

Policy DLPD8 – Sustainable Transport and Active Travel in Dudley Town Centre

- b. Metro route and associated active travel improvements (including additional cycleways as detailed below).
- c. New cycleway links including along the A4123 (Priory Road to Tipton Road), the A4168 (A4123 south towards A459) and related to completion of the National Cycle Network route 54 through Dudley town (from A4123, via Trindle Road, King Street and Queens Cross).

Regard should be had to active travel links beyond the town centre Inset Plan area, including proposed cycle routes along the A461 (from Dudley Port via Burnt Tree).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPD8	0	0	0	+	0	0	+	0	++	0	0	+	0	0

- E.3.8.1 Policy DLPD8 promotes sustainable travel links and active travel within Dudley Town. New cycle links are prioritised, with proposed connections to the wider National Cycle Network, in addition to a new interchange and metro route. By encouraging active travel, residents are likely to become more active and could see benefits to their health. Better connected routes are more likely to encourage the uptake of active travel. A major positive impact on transport (SA Objective 9) and a minor positive impact on health (SA Objective 12) would be expected.
- E.3.8.2 Improvements to transport links and encouragement of active travel has potential to reduce private car use. Therefore, a minor positive impact on climate change mitigation and air pollution could also be achieved (SA Objectives 4 and 7).

E.3.9 Policy DLPDPS1 – (Priority Site) Land at King Street/Flood Street

Policy DLPDPS1 – (Priority Site) Land at King Street/Flood Street

[See DLP for sites plan]

Site context: This site will be allocated for mixed use redevelopment, including housing. The site could deliver a minimum of circa 120 dwellings (indicative capacity which is not a cap).

This site is bounded to west by the recently completed Duncan Edwards Leisure Centre and associated car park, to the north by King Street (with an existing retail frontage) and to the south by Martin Hill Street and Duncan Edwards Way (Dudley Southern Bypass). There is an existing retail frontage to King Street which would benefit from enhancements along this key route and gateway to the town. The area is dominated by large areas of surface car parking (currently out of use whilst the Metro line is under construction).

There is a former office building, Falcon House, which has since been converted to a residential use occupying a key location between Flood Street and New Mill Street. Existing properties on site are occupied by various uses, including a furniture store, car wash and car repair garage. To the west of New Mill Street is an historic churchyard as well as several historic and more modern buildings. There is modern residential estate to the south of the site.

Policy DLPDPS1 – (Priority Site) Land at King Street/Flood Street

The north-western part of the site fronting King Street (existing retail frontage) is within the Town Centre Core Area. The new Metro line will pass along Flood Street, with a new Metro stop (under construction) and associated public realm provision to provide connections into the town centre. Leisure uses in this location would complement the existing Duncan Edwards Leisure Centre, providing a 'hub' for such activities adjacent to sustainable transport links (alongside other main town centre uses). Higher density residential development would complement existing residential provision nearby and would also maximise the benefits of the Metro stop on this site.

The site is largely adjacent to the Dudley Town Centre Conservation Area with a part of the site along the King Street frontage falling within it. In the context of the Urban Historic Landscape Characterisation the opportunity site falls within two character zones, Character Zone 9 (Dudley King Street and Prospect Hill) and Character Zone 15 (Flood Street Car Parks and Offices Complex).

Delivery phasing of dwellings and any other development:

Mixed use redevelopment of the site including,

- a. Class E uses and Drinking Establishments/Public Houses at the ground floor within the Town Centre Core Area, in accordance with Policy DLP24 (including consideration of convenience retail).
- b. To complement existing indoor leisure provision nearby, Class E (d) Indoor sport, recreation or fitness, Class F2 (c) Areas or places for outdoor sport or recreation and Class F2 (d) Indoor or outdoor swimming pools or skating rinks (outside the Town Centre Core Area, in accordance with Policy DLP24).
- c. Complementary appropriate uses outside of the Town Centre Core Area but within the town centre boundary (in accordance with Policy DLP24).
- d. Residential development, in accordance with Policy DLP24. Indicative capacity of a minimum of circa 120 dwellings, but this is not a cap and capacity could vary as part of any mixed-use development of the site.
- e. Car parking – proposed development will need to cater for its own needs but also cater for any displaced public car parking or removal of parking that facilitates the development.
- f. Proposals to take account of and complement forthcoming Metro route/stop and associated public realm provision.

Phasing: 2028/9 – 2032/33- 120 dwellings

This policy sets out the spatial framework and specific policy requirements – other standard policy requirements will also apply set out in the DLP and other Local Plan documents.

Details of site ownership

There is mixed ownership of the site, including Council ownership (large proportions of the site) and individual private ownership.

Impact on infrastructure provision:

• School place impacts –

Analysis suggests that education infrastructure needs arising from the DLP growth are likely to be accommodated via expansions to the current school estate as opposed to the creation of new school(s). However due to the DLP plan period extending beyond current education forecasts this analysis would be ongoing, and contributions may be required.

• Highways impacts –

The site is highly accessible and has direct access to numerous alternatives to private car use, any proposals must provide high quality access to active modes whilst restraining high levels of car parking at the site and its possible displacement to nearby areas. Vehicular access is available off King Street via existing Flood Street and New Mill Street. The number of access points required, and their design should be subject to further detailed transport assessment (that has been scoped and developed in consultation

Policy DLPDPS1 – (Priority Site) Land at King Street/Flood Street

with the Council) and is dependent upon the nature of any proposed development scheme. Regard to be had to the remodelled road layout on site to facilitate the forthcoming Metro route/stop and safeguarded route for future Metro extension. A key part of the site layout should be connections to the cycling and walking network within and around the town centre. Retain, improve and integrate new development with the existing historic footpath, Garden Walk and pedestrian route from Duncan Edwards Way to King Street.

- Biodiversity net gain –

There are no designated nature conservation assets on this site. Policy **DLP30** will apply.

- Recreational open space requirements –

It will be necessary for the site to provide for and connect to good-quality walking and cycle routes that provide easy, quick and safe access to nearby open spaces and parks within and around the town centre and at Castle Hill.

- Drainage –

Sustainable drainage systems that are sufficient to achieve greenfield runoff rates should be provided for the site, in accordance with Policy DLP46.

- Historic Environment –

Dudley Town Centre Conservation Area is directly adjacent to the northern site boundary (King Street) and covers a small part of the site. Part of the site is an Archaeological Priority Area (Flood Street). There are several HER records on and adjacent to the site, including 1&2 New Mill Street (HER 15181), the site of the former United Reform Church and Graveyard (HER 984), Ye Old Foundry PH, King Street (HER 15065), New Mill Street (HER 4963) and the 'Churchill' family sculpture (HER 15180). Views to the Castle Hill Conservation Area to the northeast of the site also require consideration. The overall design approach should positively contribute to the setting of the Dudley Town Centre Conservation Area and adjacent heritage assets. Regard to be had to views into and out of the Dudley Town Centre Conservation Area and potential impact on heritage assets (refer to Landmarks, Views, Vistas and Gateways Plan in particular SV3, PV3 and EG4.)

The Dudley Town Centre Urban Historic Landscape Characterisation (UHLC) identifies that the site is located within Character Zone 9 (Dudley King Street and Prospect Hill) and Character Zone 15 (Flood Street Car Parks and Offices Complex). The UHLC describes in detail this area identifying the issues and sensitivity to change, the key heritage assets to be considered and more importantly the potential opportunities and priorities for enhancement, full reference to this information will be expected when formulating proposals for this site and when preparing Heritage and Design and Access Statements.

A TPO area to the northwest corner of the site should be preserved to contribute to the amenity value of the area and character of the Conservation Area. The potential for appropriate enhancements to this area will be considered further.

- Design principles –

New development at this location will represent higher density development (minimum of 100dph but parts of the site would be appropriate for even higher density development). The new development will retain a network of public open spaces across the site with a sustainable urban environment, including adaptable buildings and spaces to support a range of different activities and uses over time. The buildings and spaces within the development should be adaptable to accommodate various activities and use over time. To ensure permeability, the layout should connect to the surrounding vehicle roads, pedestrian routes, and metro stop with a public open space network and tree-lined streets running North-South and East-West. Additionally, the layout must also incorporate areas reserved for Midlands Metro Alliance (MMA) and the metro stop.

The part of the development facing King Street should have a relatively solid edge and respectable height to improve its visual significance, enhance and respect the designated conservation area opposite the site, and increase activity and footfall along the street and within the priority site. As for the parcel located in the southeast, taller buildings are more suitable due to the topography and location of the area. These buildings should serve as a focal point and identity to the surrounding sites opposite the metro stop and along Duncan Edwards Way. It is acceptable for a much higher density development to be located in this parcel (in excess of 100dph). Developments should ensure that the layout and design is informed by a Landscape and Visual Impact Assessment (LVIA) / Landscape Visual Appraisal (LVA).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPDPS1	+	+	+	0	0	+	-	0	++	++	0	+	+	++

- E.3.9.1 Policy DLPDPS1 sets out the preferred site allocation at 'King Street/Flood Street', which has been assessed within the SA process as a reasonable alternative site known as Site DLPDPS1. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.3.9.2 Site DLPDPS1 will be allocated for mixed uses including residential and main town centre uses under this policy. Approximately 120 homes are proposed (not capped) with an average net density of a minimum of 100dph. This would result in a major positive impact on housing (SA Objective 10).
- E.3.9.3 The site partly coincides with Dudley Town Centre CA and additionally coincides with 'Flood Street Car Park' APA. The policy states that design should *"positively contribute to the setting of the Dudley Town Centre Conservation Area and adjacent heritage assets"* and through design measures *"enhance and respect the designated conservation area opposite the site"*. Furthermore, the policy states that the *"TPO area to the northwest corner of the site should be preserved to contribute to the amenity value of the area and character of the Conservation Area"*. The design requirements of development proposals would also be likely to benefit the local landscape. Overall, through careful design and planning, the policy could potentially result in a minor positive impact on heritage assets and the local landscape (SA Objectives 1 and 2).
- E.3.9.4 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPD9 would be expected to have a minor positive impact on local biodiversity (SA Objective 3). The policy would benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.3.9.5 The policy states that in accordance with Policy DLP46 *"sustainable drainage systems that are sufficient to achieve greenfield runoff rates should be provided"*. Integration with SuDS would be expected to minimise the extent of surface water flooding. Appropriate allowances should be put in place for climate change. Assuming that these measures are put in place, in line with the requirements of Policy DLP46, this would be expected to have an overall negligible impact on flooding and climate change adaptation (SA Objective 5), when considering the site's location within areas of high surface water flood risk.
- E.3.9.6 The site is located within a highly accessible area and the policy seeks to ensure accessibility is maximised, stating that infrastructure will ensure *"the site is highly accessible and has direct access to numerous alternatives to private car use"*. The site would therefore provide sustainable transport to local facilities, including educational

- facilities and reduce the reliance on private car use. The site is located within sustainable distances to local primary and secondary schools, which under these measures would be further enhanced. Overall, it would be expected that the proposed development would have a major positive impact on education (SA Objective 14) and a negligible impact on climate change mitigation (SA Objective 4).
- E.3.9.7 The site is proposed for Class E uses which would be expected to positively impact the job opportunities within the area. Therefore, a minor positive impact could be expected on employment floorspace to some extent, despite the mixed-use development at the site (SA Objective 13).
- E.3.9.8 The site is located on brownfield land that is within a highly urbanised area; therefore, it does not contain any BMV land. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.3.9.9 The centralised location of the site ensures strong links to public transport and health infrastructure, and additionally facilitating active modes of travel such as walking and cycling. Whilst the site is located within 10 minutes of fresh food and services by both foot and public transport, the site is located beyond 2km of the nearest railway station. The policy states that *“It will be necessary for the site to provide for and connect to good-quality walking and cycle routes that provide easy, quick and safe access to nearby open spaces and parks”*. Increased accessibility to sustainable methods of transport would be expected to reduce reliance on private car use. The policy also seeks to ensure development takes advantage of the forthcoming Metro stop on site, which would help to facilitate the uptake of public transport options. Overall, a major positive impact on transport could potentially be achieved (SA Objective 9). Further to the active travel improvements, the increased connectivity to public open spaces would further help to encourage active lifestyles and improve mental wellbeing. However, the site does coincide with a small area of green space and it is uncertain if this land will be retained or lost. Overall, the policy would be expected to have a minor positive impact on health (SA Objective 12).
- E.3.9.10 The redevelopment of this site could also increase the provision of accessible homes to meet the needs of the local population. Additionally, the redevelopment would be expected to provide residents with good access to local services, open spaces and public transport, being located within the Town Centre Core Area. The site is however located within the most deprived 10% of LSOAs in England, located in Dudley 015C¹¹ and without careful planning, further development in the area could exacerbate existing inequalities. Overall, the policy would be expected to have a negligible impact on equality (SA Objective 11).
- E.3.9.11 The site is located within 200m of Duncan Edwards Way (A461) and within Dudley AQMA. The policy proposes the development of a minimum of 120 residential homes and would be expected to have a major negative impact on local air quality. Measures to avoid or

¹¹ MHCLG (2019) The English Indices of Deprivation 2019. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 11/08/23]

minimise the impacts on air quality construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on local air pollution (SA Objective 7).

- E.3.9.12 The introduction of 120 homes would be likely to result in a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.3.10 Policy DLPDPS2 – (Priority Site) Land at Trindle Road/Hall Street/Birdcage Walk (Portersfield)

Policy DLPDPS2 (Priority Site) Land at Trindle Road/Hall Street/Birdcage Walk (Portersfield)

[See DLP for sites plan]

Site context: This site will be allocated for mixed use redevelopment, including housing and a new transport interchange. The site could deliver circa 280 dwellings (indicative capacity which is not a cap).

This site is located to the southeast of the town centre and adjoins Duncan Edwards Way. It is partly located within the Town Centre Core Area. It is bounded on the north by Fisher Street, Birmingham Street and Trindle Road and Hall Street to the southwest. The Churchill Shopping Centre is located to the west and the bus station (due to be redeveloped) to the north. Located on the outside of the Churchill Shopping Centre is Birdcage Walk which has small ground floor retail units with first floor ancillary accommodation. There are several vacant properties located within a triangle of land between Trindle Road and St Joesph’s Street. The area to the south of Trindle Road has been largely cleared in recent years, formerly occupied by office and retail buildings. Smaller scale properties occupied by a mix of retail and commercial uses, along with vacant premises front areas along Trindle Road and Hall Street. A car sales operation lies along Claughton Road North.

The forthcoming Interchange and Metro stop provide an opportunity for higher density residential development at this location, maximising the benefits of the sustainable transport links. There is also the opportunity for the provision of complementary main town centre uses, linking into the wider Town Centre Core Area and providing an active frontage to the Interchange and nearby town centre uses. The public realm associated with the new Interchange, Metro, active travel links and overall redevelopment of the site should play a key role as a ‘welcoming arrivals and destination space’.

A large proportion of this site falls within the Dudley Town Centre Conservation Area and given its elevated position within the Town it provides key views to and from the Castle Hill Conservation Area and especially to nearby St Edmunds Church. Within the context of the Urban Historic landscape Characterisation (UHLC) the site falls within three character zones; Character Zone 9 (Dudley King Street and Prospect Hill); Character Zone 12 (Trindle Road, Commercial and Office Buildings); Character Zone 16 (Hall Street). Also identified in the UHLC are two Archaeological Priority Areas (APA); the Medieval Planned town of Dudley and the site of Phoenix Glassworks.

Delivery phasing of dwellings and any other development:

Residential-led development of the site including:

Policy DLPDPS2 (Priority Site) Land at Trindle Road/Hall Street/Birdcage Walk (Portersfield)

- a. Class E uses and Drinking Establishments/Public Houses at the ground floor within the Town Centre Core Area (particularly to provide a ground floor active frontage to the new Interchange), in accordance with Policy DLP24 (including consideration of convenience retail).
- b. Residential redevelopment, in accordance with Policy DLP24. Indicative capacity of circa 280 dwellings, but this is not a cap and capacity could vary as part of any comprehensive development of the site.
- c. Complementary appropriate uses outside of the Town Centre Core Area but within the town centre boundary (in accordance with Policy DLP24) may be provided, as appropriate to complement the residential development, but this would be of a small scale.
- d. A new transport interchange will be delivered on the current bus station site, complementing the forthcoming new Metro line along Trindle Road and passing through the site.

Phasing: 2028/29 – 2032/33- 280 dwellings

This policy sets out the spatial framework and specific policy requirements – other standard policy requirements will also apply set out in the DLP and other Local Plan documents.

Details of site ownership

There is mixed ownership of the site, including Council ownership and individual private ownership.

Impact on infrastructure provision:

- School place impacts –

Analysis suggests that education infrastructure needs arising from the DLP growth are likely to be accommodated via expansions to the current school estate as opposed to the creation of new school(s).

However due to the DLP plan period extending beyond current education forecasts this analysis would be ongoing, and contributions may be required.

- Highways impacts –

The sustainability of this site was included within a local cordon model produced to support the regeneration of Dudley Town Centre; a predominantly residential development at this site presents the most sustainable solution. The site is highly accessible and has direct access to numerous alternatives to private car use, any proposals must provide high quality access to active modes whilst restraining high levels of car parking at the site and its possible displacement to nearby areas. Existing access points off Trindle Road. The number of access points required, and their design should be subject to a further detailed transport assessment (that has been scoped and developed in consultation with the Council) and is dependent upon the final detail of the proposed development scheme. Proposals need to accommodate and integrate with the future Metro route (including a segregated cycleway to Trindle Road); provide good legible and easily achievable pedestrian and cycle routes between the eastern and western edges; include improved local connections to Dudley Castle and Zoo from the town.

- Biodiversity net gain –

There are no designated nature conservation assets on this site. Policy DLP30 will apply.

- Recreational open space requirements –

It will be necessary for the site to provide for and connect to good-quality walking and cycle routes that provide easy, quick and safe access to nearby open spaces and parks within and around the town centre and at Castle Hill.

- Drainage –

Sustainable drainage systems that are sufficient to achieve greenfield runoff rates should be provided for the site, in accordance with Policy DLP46.

- Historic Environment –

Northern and western part of the site lie within Dudley Town Centre Conservation Area. Archaeological Priority Areas also on western and northern parts of site. Listed buildings adjacent to site boundary include St Thomas and Our Lady Church (Grade II), St Edmunds Church (Grade II*) and Castle Hill Conservative Club (Grade II). There are several HER records, including Metro Bar, Trindle Road (HER

Policy DLPDPS2 (Priority Site) Land at Trindle Road/Hall Street/Birdcage Walk (Portersfield)

12898). Given the sites' elevated position there are key views to and from the Castle Hill Conservation Area (and Dudley Castle Scheduled Ancient Monument). The overall design approach should positively contribute to the setting of the Conservation Areas and adjacent heritage assets. New development needs to ensure the following views, landmarks and gateways are protected and where necessary improved as shown on the Landmarks, Views, Vistas and Gateways Plan: SLP1, SK6, PV1, SV1, SLP3, IG2, EG2 and EG6).

The Dudley Urban Historic Landscape Characterisation (UHLC) identifies that the site is located in Character Zone 9 (Dudley King Street and Prospect Hill); Character Zone 12 (Trindle Road, Commercial and Office Buildings); Character Zone 16 (Hall Street). The Dudley Town Centre Conservation Area Appraisal and the Dudley UHLC describe in detail this area identifying the issues affecting it and its sensitivity to change, the key heritage assets to be considered and, more importantly, the potential opportunities and priorities for enhancement. Full reference to this information will be expected when formulating proposals for this opportunity site and when preparing Heritage and Design and Access Statements.

Within this site and identified in the UHLC are two Archaeological Priority Areas (APA); the Medieval Planned town of Dudley and the site of Phoenix Glassworks. Accordingly, the archaeological potential of the site will need to be addressed as part of the planning application process in advance of determination of applications for this site. Whilst limited archaeological desktop assessments have been undertaken within certain parts of the site, further assessment will be required, tailored to the specific proposals being brought forward.

- **Design principles:**

Due to the topography and extensive views from the site towards several notable landmarks, including Dudley Castle and Top Church, the roofscape and elevations of any new development in this area will be highlighted prominently in views out from the castle and will need to be of high quality to enhance the castle's setting.

The existing urban grain and scale of buildings around the site are between 2 and 4 storeys, so any new development should be between 3 and 4 storeys high for residential purposes. The area has a complex topography sensitive to development; therefore, the scale of the buildings in the area should be adjusted to fit the terrain. However, some parts of the sites could, subject to the right design and the appropriate level of supporting information, accommodate taller buildings. The new development is expected to have a minimum density of 100ph overall, which will vary across the site parcels according to the type of development and housing provided. Developments should ensure that the layout and design is informed by a Landscape and Visual Impact Assessment (LVIA) / Landscape Visual Appraisal (LVA).

The impact of the development on the character and appearance of the Conservation Area, adjacent Grade II listed church, and views into and out of the area should be considered. The design and appearance of the development should respond to the existing layout of buildings, streets, roads, and spaces. The historical connection between Porter Street and Porter Street South should be safeguarded, allowing for eventual reconnection through a new pedestrian footbridge that will catalyse the Kates Hill neighbourhood and connect the area to Dudley Town Centre.

The development should provide a series of perimeter blocks that integrate and improve connections to the existing urban structure with an active frontage onto the public realm. A highly permeable and well-connected layout prioritising pedestrian and cycle users to and from the town centre, metro stop, and bus interchange is essential. To provide an appealing and safe pedestrian experience, mixed use development, especially near the metro stop, are crucial.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPDPS2	+	+	0	-	0	-	-	-	++	++	0	++	+/-	++

- E.3.10.1 Policy DLPDPS2 sets out the preferred site allocation at 'Land at Trindle Road/Hall Street/Birdcage Walk' which has been assessed within the SA process as a reasonable alternative site known as Site DLPDPS2. **Appendix C** of the R18 SA Report includes the assessment of this site pre-mitigation.
- E.3.10.2 Site DLPDPS2 will be allocated for mixed use development. Approximately 280 homes are proposed (not capped) with an average net density of a minimum of 100dph. This would be expected to result in a major positive impact on housing (SA Objective 10).
- E.3.10.3 The centralised location of the site ensures strong links to public transport and facilitates active modes of travel such as walking and cycling. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is located beyond the sustainable distance of 2km from the nearest railway station. The policy states that *"any proposals must provide high quality access to active modes"* and additionally states *"proposals need to accommodate and integrate with the future Metro route; provide good legible and easily achievable pedestrian and cycle routes between the eastern and western edges"*. Furthermore, the policy states that *"It will be necessary for the site to provide for and connect to good-quality walking and cycle routes that provide easy, quick and safe access to nearby open spaces and parks"*. These measures would help to ensure that residents have access to sustainable modes of transport and would allow greater connectivity to local services and health infrastructure. Additionally, the access to open space will encourage active lifestyles and improve health and wellbeing. Overall, the policy would be expected to have a major positive impact on transport and health (SA Objectives 9 and 12).
- E.3.10.4 The site is located partially on previously developed land; however, the site also has large areas of greenfield land within the site which may include environmentally valuable soils that would be lost as a result of the proposed development. Therefore, the policy could potentially have a minor negative impact on natural resources (SA Objective 6).
- E.3.10.5 The site coincides and is located in close proximity to several heritage assets. The site coincides with the Dudley Town Centre CA and additionally is located in close proximity to the Grade II* Listed Building 'Church of St Edmond', adjacent to the Grade II Listed Building 'Roman Catholic Church of Our Lady and St Thomas' and coincides with two APA Sites 'Phoenix of Glassworks' and 'Dudley Medieval Town Centre'. The policy identifies the importance of design to protect heritage assets, stating that *"the overall design approach should positively contribute to the setting of the Conservation Areas and adjacent heritage assets"*. The design requirements of development proposals could also benefit the local landscape, the policy states that *"the roofscape and elevations of any new development in this area will be highlighted prominently in views out from the castle and will need to*

- be of high quality to enhance the castle's setting*". The policy could potentially lead to a minor positive impact on heritage assets and local landscape, through careful design and planning (SA Objectives 1 and 2).
- E.3.10.6 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPDPS2 could potentially have a minor positive impact on local biodiversity (SA Objective 3). The policy would however benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.3.10.7 The site is located within a highly accessible area and the policy seeks to ensure accessibility is maximised, stating that infrastructure will ensure "*the site is highly accessible and has direct access to numerous alternatives to private car use*". These measures would be expected to reduce the reliance on private car use. Furthermore, the increased accessibility would allow greater opportunity to arise in regard to educational facilities. The site is located within sustainable distances to local primary and secondary schools, which under these measures would be further enhanced. Overall, it would be expected that the site would have a major positive impact on access to education (SA Objective 14) and a minor negative impact on climate change mitigation (SA Objective 4), despite the measures to encourage sustainable transport.
- E.3.10.8 The site is proposed for Class E uses which would be expected to positively impact the job opportunities within the area. However, the site is located on several businesses and the residential development proposed at this site would be expected to see a loss in employment floorspace to some extent. The overall impact on employment floorspace is uncertain (SA Objective 13).
- E.3.10.9 The policy states that in accordance with Policy DLP46 "*sustainable drainage systems that are sufficient to achieve greenfield runoff rates should be provided*", which would be expected to minimise the extent of surface water flooding. Appropriate allowances should be put in place for climate change. Assuming that these measures are put in place, this would lead to an overall negligible impact on flooding and climate change adaptation (SA Objective 5), as the site is located in areas of medium surface water flood risk.
- E.3.10.10 The redevelopment of this site could also increase the provision of accessible homes to meet the needs of the local population. Additionally, the redevelopment would be expected to provide residents with good access to local services, open spaces and public transport, given the site's location within the Town Centre Core Area. The site is however located within the most deprived 10% of LSOAs in England, located in Dudley 015C¹² and without careful planning, further development in the area could exacerbate existing inequalities. On balance, the policy would be expected to have a negligible impact on equality (SA Objective 11).
- E.3.10.11 The site is located within 200m of Duncan Edwards Way (A461) and within Dudley AQMA. The policy proposes the development of a minimum of 280 residential homes that would

¹² MHCLG (2019) The English Indices of Deprivation 2019. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf [Date accessed: 11/08/23]

be expected to significantly affect local air quality. Measures to avoid or minimise the impacts on air quality construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on local air pollution (SA Objective 7).

E.3.10.12 The introduction of 280 homes would be expected to result in an increase in generated waste and would put additional pressure on waste management facilities. Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75. A minor negative impact would be expected for waste (SA Objective 8).

E.3.11 Policy DLPDOS1 – Dudley Town Centre Opportunity Site: Tower Street/Castle Street

Policy DLPDOS1 – Dudley Town Centre Opportunity Site: Tower Street/Castle Street

Acceptable land uses

Mixed use development including:

- a. Class E uses and Drinking Establishments/Public Houses at the ground floor within the Town Centre Core Area fronting Castle Street, in accordance with Policy DLP24 (subject to below)
- b. Class F1 (a) Provision of education, fronting Tower Street (to complement existing education uses within the area). Should an education use require a larger proportion of the site including fronting onto Castle Street this should seek to provide as much of an active frontage as possible and maximise the benefits of connections to the nearby Interchange.
- c. Complementary appropriate uses outside of the Town Centre Core Area but within the town centre boundary (in accordance with Policy DLP24).
- d. New redevelopment proposals should undertake a review of the impact on town centre public car parking (of the loss of provision at Tower Street) and consider any implications for individual development proposals.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPDOS1	-	0	+	+/-	+	+	-	+/-	+	0	+	++	+	++

E.3.11.1 Policy DLPDOS1 sets out the preferred site allocation at 'Tower Street/Castle Street', which has been assessed within the SA process as a reasonable alternative site known as Site DLPDOS1. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

- E.3.11.2 The provision of "*Class E uses and Drinking Establishments/Public Houses at the ground floor within the Town Centre Core Area*" would be expected to provide additional jobs and both enhance and protect the vitality and viability of existing employment areas. Therefore, Policy DLPDOS1 would be expected to have a minor positive impact on the local economy (SA Objective 13).
- E.3.11.3 The provision of "*Class F1 (a) Provision of education, fronting Tower Street*" would be expected to provide additional education opportunities within the borough and increase the educational facilities in the area. Therefore, Policy DLPDOS1 would be expected to have a minor positive impact on equality (SA Objective 11) and a major positive impact on education (SA Objective 14).
- E.3.11.4 The site is proposed for non-residential mixed-use development of Class E and F1 uses. The carbon emissions and the type and amount of waste likely to be generated from such uses is uncertain (SA Objectives 4 and 8).
- E.3.11.5 The site is located on brownfield land that is within a highly urbanised area. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.3.11.6 The centralised location of the site ensures strong links to local services (including healthcare infrastructure), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is located beyond the sustainable distance of 2km from the nearest railway station. The policy states that "*new redevelopment proposals should undertake a review of the impact on town centre public car parking (of the loss of provision at Tower Street)*". Overall, the policy would be expected to have a major positive impact on health (SA Objective 12), a minor positive impact on transport (SA Objective 9).
- E.3.11.7 The site resides in Flood Zone 1 and is not located in any areas of surface water flood risk. However, the policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, a minor positive impact is identified on climate change adaptation (SA Objective 5).
- E.3.11.8 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPDOS1 could potentially have a minor positive impact on local biodiversity (SA Objective 3). The policy would benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.3.11.9 The site has no capacity for residential development and therefore would be expected to have a negligible impact on housing (SA Objective 10).

- E.3.11.10 The site is located in close proximity to several heritage assets, including coinciding with the Dudley Town Centre CA, located 30m from the Grade II* Listed Building 'Church of St Edmund', adjacent to the Grade II Listed Building 'Baylies' Charity School' and coinciding with the 'Dudley Medieval Town Centre' APA. These heritage assets would be expected to contribute to the local landscape character and the policy should provide stronger wording to ensure that both the assets and their settings will be conserved and enhanced alongside the proposed development. Overall, there is potential for a minor negative impact for cultural heritage (SA Objective 1) and a negligible impact on the local landscape (SA Objective 2).
- E.3.11.11 The site is located within 200m of the A459 and within Dudley AQMA. Measures to avoid or minimise the impacts on air quality construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).

E.3.12 Policy DLPDOS2 – Dudley Town Centre Opportunity Site: Trident Centre/Upper High Street

Policy DLPDOS2 – Dudley Town Centre Opportunity Site: Trident Centre/Upper High Street

Acceptable land uses

Mixed use development including:

- a. Class E uses and Drinking Establishments/Public Houses at the ground floor within the Town Centre Core Area in accordance with Policy DLP24 (including consideration of convenience retail).
- b. Residential redevelopment or conversion at the upper floors, in accordance with Policy DLP24. Indicative capacity of 60 dwellings, but this is not a cap and capacity could vary as part of any mixed-use development of the site.
- c. Complementary appropriate uses outside of the Town Centre Core Area but within the town centre boundary (in accordance with Policy DLP24).
- d. Inhedge Gardens is currently an underused greenspace and pedestrian link into the Town Centre Core Area which will be protected and enhanced through public realm improvements. Direct links between High Street and Inhedge should be considered as part of any redevelopment proposals. Active frontages to Inhedge should be considered as part of any redevelopment proposals.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPDOS2	-	0	+	0	-	+	-	0	0	+	0	++	+/-	++

- E.3.12.1 Policy DLPDOS2 sets out the preferred site allocation at 'Trident Centre/Upper High Street' has been assessed within the SA process as a reasonable alternative site known as Site DLPDOS2. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.3.12.2 The site has an indicative capacity of 60 dwellings that would be expected to increase the housing provision of the area and provide accessible homes, located in close proximity to local services and public transport networks. The site is located within the most deprived 10% of LSOAs in England, located in Dudley O11C¹³ and without careful planning, further development in the area could exacerbate existing inequalities. Overall, the policy would be expected to have a minor positive impact on housing provision (SA Objective 10) and a negligible impact on equality (SA Objective 11).
- E.3.12.3 The provision of "*Class E uses and Drinking Establishments/Public Houses at the ground floor within the Town Centre Core Area*" could potentially provide additional jobs and both enhance and protect the vitality and viability of existing employment areas. However, the proposed residential development could also result in the loss of some existing employment floorspace. It is uncertain whether there would be a net change in employment floorspace as a result of the policy (SA Objective 13).
- E.3.12.4 The site is located on brownfield land that is within a highly urbanised area. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.3.12.5 The site is located in close proximity to several heritage assets, including coinciding with the Dudley Town Centre CA, located 20m from Grade II* Listed Building 'Dudley Parish Church of St Thomas', adjacent to Grade II Listed Buildings '6 and 7 Wolverhampton Street', the 'Unitarian Church' and several other Grade II Listed Buildings and coincides with the 'Dudley Medieval Town Centre' APA. These heritage assets would be expected to contribute to the local landscape character and the policy should provide stronger wording to ensure that both the assets and their settings will be protected and enhanced alongside the proposed development. Overall, a minor negative impact would be expected for cultural heritage (SA Objective 1) and a negligible impact on the local landscape (SA Objective 2).

¹³ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/loD2019_Statistical_Release.pdf [Date accessed: 11/08/23]

- E.3.12.6 The policy states that *"Inhedge Gardens is currently an underused greenspace and pedestrian link into the Town Centre Core Area which will be protected and enhanced through public realm improvements"*. This may help to conserve and enhance existing greenspaces, with associated benefits to climate change resilience as well as health and wellbeing. The policy would however benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, with the site being located within areas of high surface water flood risk, a potential minor negative impact is identified on climate change adaptation (SA Objective 5).
- E.3.12.7 The site is located within Dudley AQMA and proposes an indicative capacity of 60 residential homes that would be expected to have a minor negative impact on air quality. Measures to avoid or minimise the impacts on air quality construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).
- E.3.12.8 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPDOS2 would be expected to have a minor positive impact on local biodiversity (SA Objective 3). The policy would benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.3.12.9 The centralised location of the site ensures strong links to local services (including healthcare infrastructure and education facilities), public transport, active modes of travel such as walking and cycling and therefore development at this location would support reduced reliance on private car use. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond the sustainable distance of 2km from the nearest railway station. The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. Overall, the policy would be expected to have a major positive impact on health and education (SA Objective 12 and 14), a negligible on climate change mitigation (SA Objective 4), and a negligible impact on transport assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.3.12.10 The policy proposes the development of 60 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.3.13 Policy DLPDOS3 – Dudley Town Centre Opportunity Site: Upper High Street/King Street

Policy DLPDOS3 – Dudley Town Centre Opportunity Site: Upper High Street/King Street

Acceptable Land Uses

- a. Residential reuse of upper floors in retained buildings and residential redevelopment. Indicative capacity of 40 dwellings, but this is not a cap and capacity could vary as part of individual proposals.
- b. Complementary appropriate uses outside of the Town Centre Core Area but within the town centre boundary (in accordance with Policy DLP24). This is anticipated to comprise of primarily ancillary Class E uses at ground floor level to complement residential development and provide a continued active frontage in this gateway location.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLPDOS3	-	0	+	0	0	+	-	0	+	+	0	++	+/-	++

E.3.13.1 Policy DLPDOS3 sets out the preferred site allocation at 'Upper High Street/King Street' which has been assessed within the SA process as a reasonable alternative site known as Site DLPDOS3. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.3.13.2 The site has an indicative residential capacity of 40 homes. The site is located within the most deprived 10% of LSOAs in England, located in Dudley 011C¹⁴ and without careful planning, further development in the area could exacerbate existing inequalities. Overall, the site would be expected to have a minor positive impact on housing provision (SA Objective 10) and a negligible impact on equality (SA Objective 11).

E.3.13.3 The site is located on brownfield land that is within a highly urbanised area. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).

E.3.13.4 The policy states that complimentary appropriate uses would comprise of "primarily ancillary Class E uses at ground floor level" which could increase job provision and employment floorspace. However, it is uncertain whether the proposed residential development at this site would result in the loss of current employment floorspace at the

¹⁴ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf [Date accessed: 11/08/23]

site. It is uncertain whether there would be a net change in employment floorspace provision (SA Objective 13).

- E.3.13.5 The site is located within the Dudley Town Centre CA and coincides with the Grade II Listed Building '83 and 83A High Street'. The site is also located in close proximity to several other heritage assets, including being located 50m west of the Grade II* Listed Building 'Dudley Parish Church of St Thomas' and coinciding with the 'Dudley Medieval Town Centre' APA. These policy should provide wording to ensure that both the assets and their settings will be protected and enhanced alongside the proposed development. The proposed ancillary Class E uses of this development should serve as "*a continued active frontage*" which could help to ensure the development reflects the local landscape character and may also serve to conserve the setting of nearby heritage assets. It is assumed that development would be in accordance with Policy DLPD6 which could help to ensure that potential adverse effects on heritage assets are minimised and that opportunities for enhancement are sought. It is recommended that this should be made clear within the policy. On balance, the policy could potentially lead to a minor negative impact in cultural heritage (SA Objective 1) and a negligible impact on landscape (SA Objective 2).
- E.3.13.6 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPDOS3 would be expected to have a minor positive impact on local biodiversity (SA Objective 3). The policy would benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.3.13.7 The centralised location of the site ensures strong links to local services (including healthcare infrastructure and education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond the sustainable distance of 2km from the nearest railway station. Overall, the policy would be expected to have a major positive impact on health and education (SA Objective 12 and 14), a minor positive impact on transport (SA Objective 9), and a negligible impact on climate change mitigation (SA Objective 4).
- E.3.13.8 The site resides in Flood Zone 1 and is not located in any areas of surface water flood risk. However, the policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, a minor positive impact is identified on climate change adaptation (SA Objective 5).
- E.3.13.9 The site is located within Dudley AQMA and proposes an indicative capacity of 40 residential homes that would be expected to have a minor negative impact on air quality. Measures to avoid or minimise the impacts on air quality construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from

referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).

E.3.13.10 The policy proposes the development of 40 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.3.14 Policy DLPDOS4 – Dudley Town Centre Opportunity Site: Abberley Street/King Street

Policy DLPDOS4 – Dudley Town Centre Opportunity Site: Abberley Street/King Street

Acceptable Land Uses

- a. Residential reuse of retained buildings and residential redevelopment. Indicative capacity of 50 dwellings, but this is not a cap and capacity could vary as part of individual proposals.
- b. Complementary appropriate uses outside of the Town Centre Core Area but within the town centre boundary (in accordance with Policy DLP22). This is anticipated to comprise of primarily ancillary Class E uses at ground floor level to complement residential development and provide a continued active frontage in this gateway location.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPDOS4	0	0	+	0	+	+	-	0	+	+	0	++	+/-	++

E.3.14.1 Policy DLPDOS4 sets out the preferred site allocation at 'Abberley Street/King Street' has been assessed within the SA process as a reasonable alternative site known as Site DLPDOS4. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.3.14.2 The site has an indicative residential capacity of 50 homes. The site is located within the most deprived 10% of LSOAs in England, located in Dudley 010B¹⁵ and without careful planning, further development in the area could exacerbate existing inequalities. Overall, the site would be expected to have a minor positive impact on housing provision (SA Objective 10) and a negligible impact on equality (SA Objective 11).

¹⁵ MHCLG (2019) The English Indices of Deprivation 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf [Date accessed: 11/08/23]

- E.3.14.3 The site is within close proximity to several heritage assets, including partially coinciding with the Dudley Town Centre CA, located 60m from Grade II* Listed Building 'Dudley Parish Church of St Thomas', adjacent to Grade II Listed Building '63 Vicar Street' (along with 61 and 62 Vicar Street) and adjacent to the 'Dudley Medieval Town Centre' APA. These policy should provide wording to ensure both the assets and their settings will be protected and enhanced alongside the proposed development. The proposed ancillary Class E uses of this development are identified as serving as "*a continued active frontage*" and emphasises the importance of design measures to ensure the development reflects the local landscape character, which could also contribute towards the conservation and enhancement of heritage assets and their settings. Overall, a negligible impact would be expected for cultural heritage and the local landscape (SA Objectives 1 and 2).
- E.3.14.4 The centralised location of the site ensures strong links to local services (including healthcare infrastructure and education facilities), public transport, active modes of travel such as walking and cycling and therefore development at this location would support reduced reliance on private car use. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond the sustainable distance of 2km from the nearest railway station. Overall, the policy would be expected to have a major positive impact on health and education (SA Objective 12 and 14), a minor positive impact on transport (SA Objective 9), and a negligible impact on climate change mitigation (SA Objective 4).
- E.3.14.5 The site is located on brownfield land that is within a highly urbanised area. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.3.14.6 The policy states that complimentary appropriate uses would comprise of "*primarily ancillary Class E uses at ground floor level*" which could increase job provision and employment floorspace. However, the residential development at this site could result in a loss of current employment floorspace at the site. Therefore, the overall net change in employment floorspace is uncertain (SA Objective 13).
- E.3.14.7 The site is located within Dudley AQMA, is located within 200m of the A4101 and proposes an indicative capacity of 50 residential homes that would be expected to have a minor negative impact on air quality. Measures to avoid or minimise the impacts on air quality construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).
- E.3.14.8 The site does not coincide with any designated nature conservation assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPDOS4 could potentially have a minor positive impact on local biodiversity (SA Objective 3). The policy would however benefit from

stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.

- E.3.14.9 The site resides in Flood Zone 1 and is not located in any areas of surface water flood risk. However, the policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, a minor positive impact is identified on climate change adaptation (SA Objective 5).
- E.3.14.10 The policy proposes the development of 50 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.4 Stourbridge Town Centre

E.4.1 Policy DLPS1 – Stourbridge Town Centre and Town Centre Core Area

Policy DLPS1 – Stourbridge Town Centre and Town Centre Core Area

- The Stourbridge Town Centre and Town Centre Core Area boundaries are identified on the Stourbridge Town Centre Inset Policies Map.
- In line with national and local planning policy, any new retail developments will be directed towards the Town Centre Core Area. Dudley Council will consider the application of planning conditions to any planning permissions granted to ensure the retention of the retail use, where necessary, relevant, and reasonable in terms of the strategic importance of the development.
- Local Plan Policy DLP24 sets out the policy context for appropriate uses within Stourbridge Town Centre (Tier Two Centre). The diversification and repurposing of Stourbridge town centre in general will be supported by approving development that enhances the vitality and viability of the centre.
- The provision of additional residential development, particularly the re-use of upper floors of premises, will be encouraged through flexibility in the application of guidance and standards relating to parking provision and amenity (Local Plan Policy DLP28). All residential development must comply with the most up to date residential design guidance.
- In the case of any edge-of-centre or out-of-centre proposals, unless identified as a preferred use in the Opportunity Sites, these will only be considered favourably if a sequential test and impact assessment are satisfied (Local Plan Policy DLP26 and DLP27).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPS1	0	0	0	+	0	+	0	0	+	0	+	+	+	0

E.4.1.1 Policy DLPS1 directs the appropriate development for Stourbridge Town Centre and the Town Centre Core Area (Tier Two Centre) as identified under Policy DLP24.

E.4.1.2 The policy promotes retail development within the Town Centre Core Area, and residential development through the re-use of upper floor premises, drawing from the requirements of other DLP policies such as DLP24 and DLP28. The policy also draws from the requirements of Policy DLP27 regarding requirements of out-of-centre proposals. Overall, in line with the requirements of other Centres policies (see **Appendix D, Chapter D.7**), Policy DLPS1 would be expected to have a minor positive impact on climate change associated with transport emissions, natural resources, sustainable transport methods, equality, public health and the local economy (SA Objectives 4, 6, 9, 11, 12 and 13).

E.4.2 Policy DLPS2 – Stourbridge Wharf

Policy DLPS2 – Stourbridge Wharf

The Stourbridge Wharf area, the boundaries of which are set out on the Proposals Map, shall be promoted as focus for creative/cultural industry and visitor economy related business, with complementary entertainment

Policy DLPS2 – Stourbridge Wharf

and leisure uses. These will be sensitive to the existing and proposed residential uses, whilst promoting the area’s unique heritage. Preferred uses are –

- a. Canal based uses and activities – including the provision of additional visitor moorings and boater’s facilities, and canal themed industry with ancillary retail uses.
- b. Creative/cultural industry and visitor economy related businesses, specifically uses connected with the arts, including studios and performance spaces.
- c. Residential uses, which shall be designed to relate to the canal and river setting, including providing an active frontage to these watercourses whilst, being sensitive to existing industry, heritage assets, and the nature conservation value of the area.

The environment of this area shall be enhanced and upgraded, through enabling development, development contributions, and other delivery mechanisms as appropriate, with a particular focus on the following measures being implemented:

- a. Safeguarding the operational viability of the Stourbridge Navigation Trust (SNT) by the formalisation of enclaves around those parts of the area where the activities of SNT are based and the provision of car parking areas to facilitate the holding of events.

Public realm improvements to include works to enhance the nature conservation value of the area and towpath improvements, including the formation of an expanded canal basin.

Improvements shall be sensitive to heritage assets and be embedded within Green Infrastructure, which enhances existing wildlife habitats and uses locally distinct flora and includes the removal of invasive plan species.

Improvements to the connectivity over the canal and river through the provision of new bridges connecting new residential developments with the wider area.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLPS2	0	+	+	0	0	0	0	0	+	0	0	0	+	0

E.4.2.1 Policy DLPS2 focuses on development within Stourbridge Wharf, directing development to ensure a *"creative/cultural industry and visitor economy related business, with complementary entertainment and leisure uses"* is promoted. Development proposals will be required to ensure that the area is welcoming to visitors through canal-based activities and a creative industry with specific uses relating to *"the arts, including studios and performance spaces"*. The focus on this canal industry could be beneficial in creating a landscape identity for the area and boosting the local economy. Therefore, the policy would be expected to have a minor positive impact on landscape and the economy (SA Objectives 2 and 13).

E.4.2.2 The incorporation of GI into the improvements will provide opportunities to aid habitat connectivity and could potentially help to manage and improve the SLINC located at the canal, which in turn could provide BNG uplift associated with development proposals. Therefore, these measures would be expected to have a minor positive impact on local

biodiversity (SA Objective 3); however, the policy would benefit from including wording to recognise the local SLINCs and encourage their conservation and enhancement in accordance with other DLP policies.

E.4.2.3 The policy states that improvements will be *"sensitive to heritage assets"*. Therefore, it can be expected to have a negligible impact on heritage assets in the area (SA Objective 1). Stronger wording would benefit this policy, such as referencing the conservation and enhancement of heritage assets and their settings which could potentially lead to positive effects.

E.4.2.4 The proposed *"Improvements to the connectivity over the canal and river"* including connections to residential developments would also help to contribute towards a more permeable public realm, with a minor positive impact on transport and accessibility (SA Objective 9).

E.4.3 Policy DLPS3 – Urban Character and Appearance in Stourbridge

Policy DLPS3 – Urban Character and Appearance in Stourbridge

All new development within the plan area shall:

- a. Respect and respond to the local distinctiveness and existing context of established built form, scale, and massing that presents the broad urban townscape of the Inset Plan area. This includes locally distinctive plot widths, building heights, building proportion, roofscapes, form, materials, distinctive style, and historical relationship of the pattern of building in its enclosure of the streets on which it stands.
- b. Provide for, and take opportunities to, enhance active frontages at the interface between public and private spaces, in particular those fronting the ring road, River Stour and Stourbridge Branch Canal, reduce the physical and visual impact of vehicles and service areas, and enable a clear distinction between public and private spaces.

The choice of which locally distinctive elements are incorporated into the design of a development, and the degree to which they are incorporated, depends upon the location of the proposal, and the function the building serves in the townscape as described by other Policies in this Plan.

Developments can incorporate elements not described as 'locally distinctive' or be of a more contemporary style provided that the overall design of the development does not harm the achievement of a locally distinctive Town Centre.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPS3	+	+	0	0	0	0	0	0	0	0	0	0	+	0

E.4.3.1 Policy DLPS3 aims to ensure that new development within Stourbridge conserves and enhances local distinctiveness of the town centre, taking into consideration the existing context and character of the area. The policy sets out different aspects of the townscape

to consider including “*plot widths, building heights, building proportion, roofscapes, form, materials, distinctive style, and historical relationship of the pattern of building in its enclosure of the streets*”. Through ensuring that new development responds to its surroundings and seeks opportunities for enhancement, a minor positive impact on cultural heritage and the character of the landscape / townscape would be likely (SA Objectives 1 and 2).

E.4.3.2 The policy encourages the incorporation of enhanced active frontages and aims to “*reduce the physical and visual impact of vehicles and service areas*”. This could potentially help to encourage footfall within the town centre, with potential secondary benefits in terms of stimulating the local economy, leading to a minor positive impact on SA Objective 13.

E.4.4 Policy DLPS4 – Stourbridge Town Design – Landmarks, Views, Vistas and Gateways

Policy DLPS4 – Stourbridge Town Design – Landmarks, Views, Vistas and Gateways

All new development should have regard to Policy DLP4, Policy DLP39 and Policy DLP55 to deliver high quality design. Developments within and in the setting of the Conservation Areas should have regard to Policy DLP56.

New development and proposed alterations to existing buildings should:

- a. Enhance the sense of arrival by improving existing gateways and where appropriate create new ones that reinforce principal routes and spaces (see also Policy DLP D4).
- b. Create architectural corner features and new landmark features to improve the understanding of the town where appropriate.
- c. Safeguard and enhance local and important views, vistas, landmarks and gateways within and at the edges of the town centre.
- d. Protect key gateway buildings that give the town character and respect building lines, where appropriate, to assist the continuity of the town’s heritage and help secure and improve views and vistas.
- e. Respect the height and mass and visibility of existing Stourbridge landmarks. Such landmarks should not be overwhelmed by new development nor their setting compromised. Consideration of the effect on setting has regard to the importance of the landmark, the extent of any harm, and the benefit arising from development.
- f. Ensure that new buildings have a scale, mass, height and impact that is responsive to its context and sensitive to its roofscape/skyline.
- g. Create variations in roofscape that will respect important local and strategic views.
- h. Ensure that larger development facades and rooflines should reduce their scale and massing by subdividing into smaller architectural elements.

Where new development is likely to have an impact on an identified view, skyline or landmark, accurate visual representations will be required as part of any development proposals. Choice of materials and finishes need careful consideration in order to protect and enhance the existing design context.

The following landmarks, gateways, views and vistas should be protected and enhanced where possible in accordance with the above Policy considerations;

- a. **Strategic Landmark (Positive):**
 - o SLP1- Stourbridge Town Hall

Policy DLPS4 – Stourbridge Town Design – Landmarks, Views, Vistas and Gateways

- SLP2- St Thomas’s Church
- SLP3- Former Library and Art College
- SLP4- The Town Clock
- SLP5- Bonded Warehouse
- SLP6- Titan Works
- SLP7- Alexandra House, Enville Street

b. **Local Landmarks (Positive):**

- LLP1- The Old Bank (former Yorkshire Bank), no. 38 High Street
- LLP2- Nos. 101/102 High Street (Corner of Court Street)
- LLP3- The Chequers Inn public house, no. 96 High Street
- LLP4- Methodist Church, New Road
- LLP5- The Church of Our Lady and All Saints, New Road (ring road)
- LLP6- Side Space, home of the Side by Side theatre company, in the former St. Johns Church, St. John’s Road (ring road)
- LLP7- Strawberry Hill Gothic (7 Lower High Street)
- LLP8- King Edward IV College, middle of Lower High Street
- LLP9- Nickolls & Perks (wine merchants) Top of Lower High Street
- LLP10- The Duke William public house, 25 Coventry Street/corner of Duke Street
- LLP11- Lion Health (former Foster & Rastrick Works)

c. **Edge Gateway:**

- EG1- Pedestrian gateway, subway connection from Stourbridge Interchange/Stourbridge Town rail station, arriving in Foster Street Place
- EG2- Pedestrian gateway from Hagley Road/Church Street into the High Street & vehicular gateway from St. John’s Road (ring road) into the top end of the High Street
- EG3- Pedestrian gateway (subway link) from Worcester Street into Market Street
- EG4- Pedestrian gateway (controlled crossing point over Bath Road (ring road) from the old town via Green Street/Lion Street into Bell Street
- EG5- Pedestrian gateway (subway link) from A458/Enville Street or from Hemplands Road into Crown Lane & vehicular gateway from A458/Enville Street onto Bath Road (ring road)
- EG6- Pedestrian gateway via underpass from Bradley Road/Lower High Street/A491 & St. John’s Road (ring road) into Lower High Street & vehicular gateway from A491 onto the ring road/St. John’s Road
- EG7- Pedestrian gateway (subway link) from A458 Birmingham Street to Duke Street & vehicular gateway from St. John’s Road (ring road) into Duke Street

Development should have regard to and respect the following important views and vistas:

d. **Panoramic View (View Cone) in/out of Stourbridge:**

- PV1- From A491 looking southwards across the bottom of Lower High Street into the heart of the town centre (with the tower of Stourbridge Town Hall and the spire of Our Lady & All Saints both visible)
- PV2- From the junction of Parkfield Road/Vauxhall Road looking northeast towards the town centre (clearly visible: the tower of the fire station, Side Space - in the former St. Johns Church, former Library & Art College, and the spire of Our Lady & All Saints)
- PV3- From Bath Road (ring road) looking north towards the tree-lined horizon

e. **Strategic View:**

- SV1- From Worcester Street looking north across New Road (ring road) into Market Street and the heart of the town centre (with the tower of Stourbridge Town Hall visible)

Policy DLPS4 – Stourbridge Town Design – Landmarks, Views, Vistas and Gateways

- SV2- From A491 looking southwards across the bottom of Lower High Street into the heart of the town centre (with the tower of Stourbridge Town Hall and the spire of Our Lady & All Saints both visible)
- SV3- From St. John’s Road (ring road) looking southwards across the core of the town centre to the spire of Our Lady & All Saints, New Road (ring road)

f. Vista:

- V1- From the bottom of Lower High Street looking southwards towards the top of Lower High Street (with the top of the tower of Stourbridge Town Hall visible)
- V2- From Crown Square looking southwest along Market Street (with the tower/side of Stourbridge Town Hall clearly visible)
- V3- From Crown Square looking southeast along the High Street (with the former post office visible)
- V4- From Crown Square looking eastwards along Coventry Street
- V5- From Crown Lane looking eastwards towards Nickolls & Perks on the corner of Coventry Street (The Old Bank to the right & The Mitre to the left)

g. Local View:

- LV1- From the High Street looking across the Ring Road (southeast) towards the former Library & Art College
- LV2- From the Ring Road looking southeast towards the former Library & Art College
- LV3- From Hagley Road looking northeast towards the former Library & Art College
- LV4- From Church Street looking northwest towards the rear of former Library & Art College
- LV5- Coventry Street looking northwest towards The Mitre public house
- LV6- Crown Lane looking northwest across the Ring Road towards Alexandra House, Enville Street
- LV7- Bath Road (Ring Road) looking northwest towards Alexandra House, Enville Street
- LV8- Court Street looking southeast across New Road (ring road) towards the former Library & Art College
- LV9- Court Street looking southwest across New Road (ring road) towards Our Lady & All Saints
- LV10- Victoria Street looking southeast across New Road (ring road) towards Our Lady & All Saints
- LV11- Victoria Street looking south across New Road (ring road) towards the Methodist Church, New Road
- LV12- From A458/junction with St. John’s Road (ring road) looking west across the ring road towards the Duke William public house, corner of Duke Street/Coventry Street
- LV13- From the junction of A491 High Street/Canal Street looking west along Canal Street (Bonded Warehouse)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPS4	+	+	0	0	0	0	0	0	0	0	0	0	0	0

- E.4.4.1 Policy DLPS4 seeks to ensure that new development proposals within Stourbridge conserve and enhance the local character and distinctiveness, with consideration of height, massing, views and gateways.
- E.4.4.2 The policy identifies prominent views and landmarks within Stourbridge that in accordance with the policy should be protected, including several designated heritage assets such as those within the Stourbridge High Street Conservation Area. Therefore, the policy can be expected to have a minor positive impact on the enhancement of local character, distinctiveness and identity of the area (SA Objective 2). The policy will also be likely to have a minor positive impact on the character, setting and significance of heritage assets within the area (SA Objective 1), recognising that "*landmarks should not be overwhelmed by new development nor their setting compromised*".

E.4.5 Policy DLPS5 – Public Realm in Stourbridge

Policy DLPS5 – Public Realm in Stourbridge

The townscape within the Town Centre shall be enhanced to provide a high-quality space, particularly for the use of pedestrians and cyclists. Specific measures, which development will be expected to contribute to, include –

- a. The enhancement of the following spaces as Town Centre 'squares' with locally distinctive hard and soft landscaping, seating (in association with adjoining uses as appropriate) and lighting, and, where appropriate, public art:
- b. Ryemarket Square (at the entrance to The Ryemarket from High Street)
- c. Foster Street Square (where the subway emerges onto Foster Street)
- d. St.Thomas' Square (the gardens at Market Street)

The enhancement of the following spaces of public realm, with locally distinctive hard and soft landscaping, seating (where appropriate) and lighting, and where appropriate, public art:

- Proposed lower high street pocket park
- Greenfield Gardens
- Brook Street
- Rye Market Entrance (Market Street)
- Victoria Passage Entrance (Talbot Street)
- Entrance to Smithfield Market

The enhancement of the following streets and paths which are particularly in need of a visual uplift with locally distinctive hard, and more significantly, soft landscaping and where appropriate, public art:

- Town Centre's historic passageways
- Talbot Street
- Victoria Street
- Queen Street
- Lower High Street
- Birmingham Street
- Foster Street

The Town Centre comprising High Street and Market Street shall be the subject of public realm improvements, giving more priority to pedestrian movement whilst retaining on-street parking in bays within an enhanced streetscape. In particular, public realm improvements shall address:

Policy DLPS5 – Public Realm in Stourbridge

- a. The provision of bespoke designed surfacing and footway widening along the length of the zone to run into the Public Squares,
- b. The provision of greener thoroughfares including the planting of native or locally distinct trees,
- c. The accommodation of, and works to facilitate, the holding of markets and events within the Town Centre core.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPS5	0	+	+	0	0	0	0	0	+	0	0	+	+	0

- E.4.5.1 Policy DLPS5 aims to provide improvements to the public realm of Stourbridge Town Centre through enhancing the visual appeal and improving accessibility.
- E.4.5.2 The policy identifies Town Centre squares, streets, and paths in need of *"visual uplift"* through soft and hard landscaping which will enhance the townscape. The policy also encourages the incorporation of new seating and public art. These measures would be expected to have a minor positive impact on the character and appearance of the local area (SA Objective 2).
- E.4.5.3 The policy states that improvements to the public realm will include *"the planting of native or locally distinct trees"*. This would be expected to have a minor positive impact on local biodiversity and may provide opportunities for supporting BNG (SA Objective 3).
- E.4.5.4 Accessibility is identified as a requirement of the improvements to the public realm. The policy states that enhancements should provide a *"high-quality space, particularly for the use of pedestrians and cyclists"* where *"more priority would be given to pedestrian movement"*. Accessibility improvements will have impacts on the health of residents, where they will have greater opportunity to pursue an active lifestyle and can support a modal shift away from car use. Therefore, the policy can be expected to have a minor positive impact on accessibility and the health of residents (SA Objectives 9 and 12).
- E.4.5.5 The measures set out in the policy to improve the public realm may also help to stimulate regeneration, increase footfall in the town centre and lead to a minor positive impact on the local economy (SA Objective 13).

E.4.6 Policy DLPS6 – Conservation and Enhancement of Local Character and Distinctiveness in Stourbridge

Policy DLPS6 – Conservation and Enhancement of Local Character and Distinctiveness in Stourbridge

All development proposals should take account of the locally distinctive character of the area in which they are to be sited, including its historic character, and should respect and respond to its positive attributes. Physical assets (buildings, sites, or areas together with their settings) whether man-made or natural that positively contribute to the local character and distinctiveness of Stourbridge’s landscape and townscape should be retained and, wherever possible, enhanced, and their settings be respected.

New development in Stourbridge should be designed so as to reinforce and enhance local distinctiveness and full reference should be made in Design and Access Statements accompanying planning applications to the Stourbridge Urban Historic Landscape Characterisation. Design and Access Statements should clearly set out the steps that have been taken to achieve locally responsive outcomes through either traditional or more contemporary design solutions.

In respect of major individual developments or in relation to particularly environmentally sensitive areas, developers may in future themselves be required to commission more detailed “Local Area Character Appraisals” (as defined in the councils latest Dudley Historic Environment SPD) in order to inform specific land use proposals more fully.

In cases where changes of character or demolition are unavoidable Dudley Council will seek to ensure that provision is made for an appropriate level of archaeological recording to take place prior to the alteration of the features concerned.

Proposed developments located within the High Street Stourbridge Town Centre Conservation Area and Stourbridge Branch Canal (Canal Street) Conservation Area will be determined with particular reference to the NPPF, Stourbridge Urban Historic Landscape Characterisation, adopted Conservation Area Character Appraisals and will need to meet the requirements set in Local Plan Policy DLP56

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPS6	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.4.6.1 Policy DLPS6 sets out requirements for development proposals within Stourbridge, aiming to ensure the local character and distinctiveness of the area is conserved and enhanced.

E.4.6.2 The policy states that physical assets which benefit the local landscape character and distinctiveness of Stourbridge should be *“retained and, wherever possible, enhanced, and their settings be respected”* and states development proposals should take account of historic character. The policy would help to ensure that development proposals within Stourbridge’s conservation areas are informed by national policy, character appraisals and other DLP policies. Therefore, the policy can be expected to have a minor positive impact on the enhancement of local character, distinctiveness and identity of the area including cultural heritage (SA Objectives 1 and 2).

E.4.7 Policy DLPS7 – Stourbridge Ring Road

Policy DLPS7 – Stourbridge Ring Road

Measures shall be encouraged which seek to reduce the visual impact of the ring road, including its dominance as a robustly urban and vehicle dominated space, and its sense of enclosure. Such measures should reduce the ring road’s severing effect, which currently disassociates the Town Centre from its surrounding areas.

- a. Gateways shall be formed at the interface between the Town Centre and the ring road. These spaces shall be enhanced to function as entrance points to the town, with each named to provide a distinctive sense of place. Public art and hard and soft landscaping should be incorporated to emphasise their visual distinctiveness including the planting of new trees. New development which encroaches into these spaces or otherwise compromises their function will be resisted.
- b. Any development within the ring road corridor shall provide an active frontage onto it and therefore a ‘welcoming face’ to the town. Development comprising the conversion of existing buildings within the ring road corridor will be expected to remedy any dead frontages onto it.
- c. No new advertisement hoardings shall be granted express consent within 30 metres of the edge of the ring road corridor.
- d. The existing subways under the ring road will continue to be enhanced, in particular to provide a light, secure and safe environment.

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
DLPS7	0	+	+	0	0	0	0	0	0	0	0	+	0	0

E.4.7.1 Policy DLPS7 aims to enhance the visual appearance of the ring road and prevent development that would encroach into any new spaces designated to improve visual amenity.

E.4.7.2 "Gateways" will be an important aspect of the aim to improve the visual appeal of the ring road, providing spaces that "provide a distinct sense of place". The spaces will include the introduction of public art and soft and hard landscaping to establish visual distinctiveness. Therefore, the policy can be expected to have a minor positive impact on the local character of the area (SA Objective 2).

E.4.7.3 Enhancement of the existing subway that is located beneath the ring road will be carried out through providing a "light, secure and safe environment". Therefore, the policy can be expected to have a minor positive impact on the safety of residents (SA Objective 12).

E.4.7.4 The reference to planting new trees within the policy could potentially lead to a minor positive impact on biodiversity (SA Objective 3). However, stronger wording surrounding the proposed enhancement of the "gateway" spaces such as reference to green infrastructure would benefit the policy and ensure multi-functional benefits including for biodiversity, health and climate change are being pursued throughout the local plan.

E.4.8 Policy DLPS8 – Pedestrian Access and Cycling in Stourbridge

Policy DLPS8 – Pedestrian Access and Cycling in Stourbridge

All appropriate existing pedestrian routes, especially the network of Public Rights of Way and existing subways under the ring road shall be retained and, where opportunities arise, improved.

New pedestrian links shall be created, particularly to link the Opportunity Sites and housing allocations with the Town Centre, the public transport hub and the Stourbridge Branch Canal and River Stour infrastructure. Wherever feasible these links shall incorporate cycleways, demarcated as distinct from the pedestrian paths. This includes:

- a. Proposed new bridges over the canal and River Stour connecting any new housing sites (including Bradley Road) providing pedestrian and cycle linkages.

New surface level crossings across the Stourbridge ring road, suitable for cyclists and pedestrians, shall be provided at:

- a. The eastern quadrant of the ring road at the junction with Birmingham Street
- b. The north-west quadrant of the ring road (Opportunity Site 1)

Secure cycle parking shall be provided along the national cycle route (Sustrans Route 54) and within Stourbridge Town Centre, particularly in Lower High Street.

Other cycle routes shall be signposted, delineated, and marked out (where feasible), and the environment which these routes pass through will be enhanced:

- a. Along the River Stour and Stourbridge Branch Canal, and routes which link into the green infrastructure network,
- b. Routes which link to Sustrans Route 54,
- c. Routes which access Mary Stevens Park and Wollaston Recreation Ground.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPS8	0	0	0	+	0	0	0	0	+	0	+	+	+	0

E.4.8.1 Policy DLPS8 provides development proposals with requirements to retain and improve existing cycle and pedestrian routes and provide new infrastructure to facilitate safe and improved connectivity around Stourbridge Town Centre.

E.4.8.2 The policy states that PRow networks and existing subways will be retained and enhanced where possible. Additionally, the policy will create new pedestrian links to central hubs and key infrastructure, and over the canal and River Stour, helping to improve the permeability of the public realm. The policy also states the importance of incorporating cycleways into links and that cycle routes will be improved by being "signposted, delineated and marked out". These improvements will help to promote active travel, improving public health and will also provide residents with more opportunities to access local services within the town centre. Encouraging more sustainable transport methods would reduce the reliance on private car use and can therefore reduce transport associated

emissions within the borough. The policy could therefore have a minor impact on climate change mitigation, transport, equal opportunities, public health and the local economy (SA Objective 4, 9, 11, 12, 13).

E.4.9 Policy DLPSOS1 – North of Birmingham Street

Policy DLPSOS1 – North of Birmingham Street	
Acceptable Land Uses	
Mixed use development including:	
<ul style="list-style-type: none"> a. Class E – Commercial, Business and service uses, which would compliment the existing commercial offerings on the site, excluding uses falling within Class E (g) (ii) and (iii) uses. b. Residential developments (Class C3) with an indicative capacity of 70 dwellings, but this capacity may vary as part of any mixed use developments on the site 	
Any developments should protect and enhance the nature conservation in the area, in particular the designated SLINC.	
There are opportunities to provide increased connectivity across Birmingham Street, linking to the town centre.	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPSOS1	-	0	0	0	-	-	-	0	++	+	+	-	+/-	++

E.4.9.1 Policy DLPSOS1 sets out the preferred allocation for the Site 'North of Birmingham Street', which has been assessed within the SA process as a reasonable alternative site known as DLPSOS1. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.4.9.2 The site has an indicative residential capacity of 70 homes and would be expected to have a positive impact on housing provision within the borough, and provide accessible homes, located in close proximity to local services and public transport networks. The policy would be expected to have a minor positive impact on housing provision and equality (SA Objectives 10 and 11).

E.4.9.3 The site is located on partially previously developed land, however, there are large areas of undeveloped land within the site, including trees, grassland and the River Stour flowing through the centre of the site. The proposed development at this location would be expected to have a minor negative impact on natural resources due to the potential loss of previously undeveloped land with environmental value (SA Objective 6). Additionally, the site coincides with the 'Stour Valley' SLINC which passes through the centre of the site alongside the River Stour. The policy states that *"any developments should protect and enhance nature conservation in the area, in particular the designated SLINC"*. As such, it is anticipated that the developable area of the site will exclude the SLINC; however, the

- policy would benefit from stronger regarding how any development that would be carried out adjacent to the SLINC would minimise its potential impacts. Cross referencing relevant DLP policies would be beneficial, including policies such as DLP31 and DLP32. Overall, the proposed development at the site could potentially have a negligible impact on biodiversity (SA Objective 3).
- E.4.9.4 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. The site is located in close proximity to public transport and is accessible to local services by foot. The site is also located within 2km from the nearest railway station. Overall, a major positive impact on transport (SA Objective 9), and a negligible impact on climate change mitigation (SA Objective 4) would be expected.
- E.4.9.5 The site wholly coincides within the 'Bedcote Malthouse' APA and the 'River Stour Corridor' HHLV. The APA and HHLV would be expected to contribute to the local landscape character and the policy should provide stronger wording on how both the assets and their setting will be conserved and enhanced alongside the proposed development. Overall, the proposed development could potentially lead to a minor negative impact on cultural heritage (SA Objective 1) and a negligible impact on landscape, assuming the proposed development would remain in keeping with the local landscape character of the area (SA Objective 2).
- E.4.9.6 The site is located beyond the sustainable distance of 5km to the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The site is also located outside of the sustainable travel time via walking to a GP surgery (15 minutes), although it is within a sustainable travel time via public transport. The policy would benefit from stronger wording in relation to accessibility to healthcare infrastructure and/or cross referencing to the relevant DLP policies, including DLP9. Overall, the policy could potentially have a minor negative impact on health (SA Objective 12).
- E.4.9.7 The site is located within Dudley AQMA, is located within 200m of the A458 and proposes an indicative capacity of 70 residential homes that would be expected to have a minor negative impact on air quality. Additionally, the River Stour flows through the site, and as such the proposed development could lead to negative impacts on water quality through contamination and runoff during both construction and occupation. Measures to avoid or minimise the impacts on air quality and water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of enhanced green cover to provide ecosystem services such as carbon sequestration and water purification. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).
- E.4.9.8 The policy proposes 70 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

- E.4.9.9 A proportion of the site alongside the River Stour is located within Flood Zone 3, as well as large areas of high surface water flood risk. The policy would benefit from including wording on how the proposed development can adapt to the impacts of climate change, such as including measures that ensure green cover and the implementation of adaptive technologies such as SuDS. Cross reference to Policies DLP45 and DLP46 would be beneficial. Overall, although the proposed improvements to the SLINC alongside the watercourse may help to minimise flood risk to some extent, the policy could potentially have a minor negative impact on climate change adaptation (SA Objective 5).
- E.4.9.10 The policy states that acceptable uses alongside residential and local community and learning are "commercial, business and service uses, which would compliment the existing commercial offerings on the site". However, the extent of employment floorspace retained and/or lost is uncertain due to the proposed residential development at the site (SA Objective 13).
- E.4.9.11 The site is surrounded by strong transport infrastructure and is located within a sustainable distance to primary and secondary schools. The location of the site would ensure good accessibility to education facilities and therefore a major positive impact on education would be expected (SA Objective 14).

E.4.10 Policy DLPSOS2 – Mill Race Lane

Policy DLPSOS2 – Mill Race Lane	
Acceptable Land Uses	
Mixed use development including:	
<ul style="list-style-type: none"> a. Retention of the existing and new employment uses (B2 and B8) b. Leisure uses (Class E and Sui Generis) which compliment the existing offering of leisure uses on the site or the existing employment uses. New retail provision on the site would not be supported, as they should be located within the Stourbridge Town Centre Core Area c. New leisure uses should demonstrate their compliance with Policies DLP 21 and DLP 22 particularly ensuring any proposed use would not conflict with any of the operational employment uses on the site. 	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPSOS2	-	0	-	+/-	--	-	-	+/-	++	0	+	+	+	0

- E.4.10.1 Policy DLPSOS2 sets out the preferred allocation for the Site 'Mill Race Lane', which has been assessed within the SA process as a reasonable alternative site known as DLPSOS2. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.4.10.2 The site is proposed for leisure uses under Use Class E and Sui Generis, which would be expected to have a negligible impact on housing provision (SA Objective 10), but would

- improve access to local services and opportunities for recreation, which could potentially have a minor positive impact on equality and wellbeing (SA Objectives 11 and 12). The policy would benefit from referencing relevant DLP policies, such as DLP9 to ensure that accessibility to local services is increased.
- E.4.10.3 The site is primarily located on previously developed land; however, a small proportion of the site in the south comprises undeveloped land, and coincides with 'Stour Valley' SLINC. The policy does not specify the developable area of the site and as such, in line with the precautionary principle, a minor negative impact on natural resources cannot be ruled out (SA Objective 6).
- E.4.10.4 The proportion of the 'Stour Valley' SLINC within the site also comprises priority habitat (deciduous woodland). The proposed development at this location could increase development related threats and pressures on the woodland and the wider SLINC, which follows the River Stour through the site, and as such, the policy could potentially have a minor negative impact on biodiversity (SA Objective 3). The policy would benefit from inclusion of wording regarding the conservation and enhancement of the SLINC alongside the proposed development.
- E.4.10.5 The centralised location of the site in Stourbridge ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. The site is located in close proximity to public transport and is accessible to local services by foot. The site is also located within 2km from the nearest railway station. Overall, a major positive impact on transport would be expected (SA Objective 9). The potential impact of the proposed mixed-use non-residential development on carbon emissions is uncertain (SA Objective 4).
- E.4.10.6 The site is located adjacent to the 'Stourbridge Branch Canal' Conservation Area. Additionally, the site coincides with the 'Early Industrial Complex, Mill Race Lane' APA and the 'River Stour Corridor' HHTV. These heritage assets would be expected to contribute to the local landscape character and the policy should provide stronger wording to ensure that both the assets and their settings will be conserved and enhanced alongside the proposed development. Overall, the proposed development could potentially lead to a minor negative impact on cultural heritage (SA Objective 1) and a negligible impact on landscape assuming the proposed development would remain in keeping with the local landscape character (SA Objective 2).
- E.4.10.7 The site is located within Dudley AQMA, is located within 200m of the A458 (St Johns Road). Additionally, the River Stour flows through the site, and as such development at this location could lead to negative impacts on water quality through contamination and runoff during both construction and occupation. Measures to avoid or minimise the impacts on air quality and water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and water purification. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).

- E.4.10.8 The policy proposes the site for leisure development and therefore the potential impact on waste generation is uncertain (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.4.10.9 A proportion of the site is located within Flood Zone 3, as well as large areas of high surface water flood risk. The policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change and ensure that new development will not exacerbate flood risk on site or downstream. The policy would benefit from including measures that ensure enhanced green cover and the implementation of adaptive technologies such as SuDS. Cross reference to Policies DLP45 and DLP46 would be beneficial. Overall, the policy could potentially have a major negative impact on climate change adaptation (SA Objective 5).
- E.4.10.10 The site currently comprises employment land, with multiple businesses. The policy states that it will support the "*retention of the existing and new employment uses (B2 and B8)*" as well as new Class E and Sui Generis uses, and therefore it is anticipated that there will be a net gain in employment floorspace to some extent. A minor positive impact on employment floorspace would be expected (SA Objective 13).
- E.4.10.11 The site is proposed for leisure uses and would not be anticipated to affect education (SA Objective 14).

E.4.11 Policy DLPSOS3 – Rye Market

Policy DLPSOS3 – Rye Market	
Acceptable Land Uses	
Mixed use development including:	
<ul style="list-style-type: none"> a. Class E uses at Ground Floor within the Town Centre Core Area in accordance with Policy DLP 24. b. Residential Development at upper floors including replacement of the existing car park. Indicative capacity of 50 dwellings, however this is dependent on the scale of any proposed development. A high-rise development above the Rye Markets Car Park current height would not be supported. c. Retention/ refurbishment of some public parking should be incorporated in any new proposals for the conversion of the upper floor/ car park to Residential. 	

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPSOS3	-	0	+	0	+	+	-	0	++	+	+	-	+/-	++

- E.4.11.1 Policy DLPSOS3 sets out the preferred allocation for the Site 'Rye Market', which has been assessed within the SA process as a reasonable alternative site known as DLPSOS3. **Appendix C** of this R18 SA Report includes the site assessment of this site pre-mitigation.
- E.4.11.2 The site has an indicative residential capacity of 50 dwellings and would be expected to have a minor positive impact on housing provision (SA Objective 10). The site could potentially increase the number of affordable homes within the area and would provide good access to local services, with potential to achieve a minor positive impact on equality (SA Objective 11).
- E.4.11.3 The site comprises previously developed land and would protect the borough's supply of undeveloped land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.4.11.4 The site does not coincide with any biodiversity assets and is located at a distance that would not result in negative impacts on surrounding biodiversity assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPSOS3 could potentially have a minor positive impact on local biodiversity (SA Objective 3). The policy would however benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.4.11.5 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, which could help to reduce reliance on private car use. The site is located in close proximity to public transport and is accessible to local services by foot, the site is also located within 2km from the nearest railway station. Overall, a major positive impact on transport would be expected (SA Objective 9). The site has an indicative residential capacity of 50 homes and would be expected to have a negligible impact on the borough's carbon footprint (SA Objective 4).
- E.4.11.6 The site is located in close proximity to the Grade I Listed Building 'Parish Church of St Thomas', located 30m from the site. Additionally, the site is also adjacent to the Grade II Listed Building 'St Thomas Vicarage' and coincides with the 'High Street Stourbridge' CA, 'Stourbridge Medieval Town Centre' APA, and the 'Stourbridge Town Centre' HHTV. The policy should provide wording to ensure that both the assets and their settings will be conserved and enhanced alongside the proposed development. Overall, a minor negative impact would be expected for cultural heritage (SA Objective 1) and a negligible impact on the local landscape, assuming the proposed development remains in keeping with the local landscape character (SA Objective 2).
- E.4.11.7 The site is located beyond 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The policy would benefit from stronger wording in relation to the accessibility to healthcare infrastructure and potentially cross referencing to the relevant DLP policies, including DLP9. Overall, the policy could potentially have a minor negative impact on health (SA Objective 12).
- E.4.11.8 The site is located within Dudley AQMA and is located within 200m of the A491 (New Road). Measures to avoid or minimise the impacts on air quality could be secured by consideration of the measures and requirements of other relevant policies within the DLP

- such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of enhanced green cover to provide ecosystem services such as carbon sequestration. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).
- E.4.11.9 The policy proposes the development of 50 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.4.11.10 The site is located within Flood Zone 1 and is not located on areas of surface water flood risk. The policy would however benefit from including measures that ensure green cover and the implementation of adaptive technologies such as passive heating and cooling systems, ensuring that the impacts of climate change are considered including retrofitting of existing buildings on site to be more energy efficient; therefore, cross referencing to Policies DLP43 and DLP46 would be beneficial. Overall, the policy could potentially have a minor positive impact on climate change adaptation (SA Objective 5).
- E.4.11.11 The site currently comprises the Ryemarket Shopping Centre, which is expected to contain a range of employment floorspace. It is uncertain whether there would be a net change in employment land and job opportunities as a result of the proposed redevelopment of the site as a result of this policy (SA Objective 13).
- E.4.11.12 The site is surrounded by strong transport infrastructure and is located within a sustainable distance to primary and secondary schools. The location of the site would be expected to provide good accessibility to education facilities and therefore lead to a major positive impact on education (SA Objective 14).

E.5 Halesowen Town Centre

E.5.1 Policy DLPH1 – Halesowen Town Centre and Town Centre Core Area

Policy DLPH1 – Halesowen Town Centre and Town Centre Core Area

The Halesowen Town Centre and Town Centre Core Area boundaries is identified on the Halesowen Town Centre Inset Policies Map.

In line with national and local planning policy, any new retail developments will be directed towards the Town Centre Core Area. Dudley Council will consider the application of planning conditions to any planning permissions granted to ensure the retention of the retail use, where necessary, relevant, and reasonable in terms of the strategic importance of the development.

Local Plan Policy DLP24 sets out the policy context for appropriate uses within Halesowen Town Centre (Tier Two Centre). The diversification and repurposing of Halesowen town centre in general will be supported by approving development that enhances the vitality and viability of the centre.

The provision of additional residential development, particularly the re-use of upper floors of premises, will be encouraged through flexibility in the application of guidance and standards relating to parking provision and amenity (Local Plan Policy DLP28). All residential development must comply with the most up to date residential design guidance.

In the case of any edge-of-centre or out-of-centre proposals, unless identified as a preferred use in the Opportunity Sites, these will only be considered favourably if a sequential test and impact assessment are satisfied (Local Plan Policy DLP26 and DLP27).

Proposals that add to or improve Halesowen Town Centre’s evening and night-time economy will be encouraged by Dudley Council.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH1	0	0	0	+	0	+	0	0	+	0	+	+	+	0

E.5.1.1 Policy DLPH1 aims to direct the appropriate development to Halesowen Town Centre and the Town Centre Core Area (Tier Two Centre) as identified under Policy DLP24.

E.5.1.2 The policy promotes residential development through the re-use of upper floor premises, drawing from the requirements of other DLP policies such as DLP24 and DLP28. The policy also draws from the requirements of Policy DLP27 regarding requirements of out-of-centre proposals. Overall, in line with the requirements of other Centres policies (see **Appendix D, Chapter D.7**), Policy DLPH1 would be expected to have a minor positive impact on climate change associated with transport emissions, natural resources, sustainable transport methods, equality, public health (SA Objectives 4, 6, 9, 11 and 12).

E.5.1.3 The policy would provide opportunities to improve access to local services and boost the local economy through supporting “*the diversification and repurposing*” of the town centre.

In addition, Policy DLPH1 states encouragement will be given to proposals that would improve Halesowen Town Centre’s evening and night-time economy. Therefore, the policy would be expected to have a minor positive impact on the local economy (SA Objective 13).

E.5.2 Policy DLPH2 – Education in Halesowen

Policy DLPH2 – Education in Halesowen														
Existing education facilities in Halesowen Town Centre will be safeguarded where there is a recognised need for them.														
Any additionally proposed education facilities will be supported in principle where appropriate within the Town Centre. Within the Town Centre Core Area, this should generally be above the ground floor (and mainly retail) frontages.														
Dudley Council will also give in principle support where appropriate to proposals for further facilities and transport infrastructure to meet student need.														

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH2	0	0	0	0	0	+	0	0	+	0	0	0	0	+

- E.5.2.1 Policy DLPH2 aims to safeguard and provide new education facilities within Halesowen. Several schools and education facilities can be found in the Halesowen area including Halesowen College, The Earls High School, Windsor High School and Sixth Form, and several primary schools.
- E.5.2.2 The policy will support further facilities and transport infrastructure to meet the student need where it is appropriate, therefore potentially improving sustainable access to education. The policy states that educational facilities within the Town Centre Core Area should generally be developed above the ground floor and those within the Town Centre will be supported where appropriate. Utilising previously developed spaces would help to prevent the use of greenfield land and positively impact material assets within the borough through promoting an efficient use of land.
- E.5.2.3 Overall, the policy would be expected to have a positive impact on natural resources, transport, and education (SA Objectives 6, 9 and 14).

E.5.3 Policy DLPH3 – Urban Character and Appearance in Halesowen

Policy DLPH3 – Urban Character and Appearance in Halesowen
All new development within the plan area shall:

Policy DLPH3 – Urban Character and Appearance in Halesowen

- Respect and respond to the local distinctiveness and existing context of established built form, scale, and massing that presents the broad urban townscape of the Inset Plan area. This includes locally distinctive plot widths, building heights, building proportion, roofscapes, form, materials, distinctive style, and historical relationship of the pattern of building in its enclosure of the streets on which it stands.
- Provide for, and take opportunities to, enhance active frontages at the interface between public and private spaces, in particular those fronting the ring road and River Stour, reduce the physical and visual impact of vehicles and service areas, and enable a clear distinction between public and private spaces.

The choice of which locally distinctive elements are incorporated into the design of a development, and the degree to which they are incorporated, depends upon the location of the proposal, and the function the building serves in the townscape as described by other Policies in this Plan:

- In the High Street/Hagley Street Character Area, developments will incorporate a high degree of locally distinctive elements.
- Outside of this area, developments have the option of using a smaller choice and degree of locally distinctive elements provided that the overall character of the Town Centre is not prejudiced.

Developments can incorporate elements not described as 'locally distinctive' or be of a more contemporary style provided that the overall design of the development does not harm the achievement of a locally distinctive Town Centre.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH3	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.5.3.1 Policy DLPH3 seeks to conserve and enhance Halesowen’s local distinctiveness, and seeks to ensure that all development proposals within the town consider the scale, appearance and design of buildings to reflect this. The policy would be likely to result in a minor positive impact on the local landscape (SA Objective 2), and could potentially result in an indirect minor positive effect on cultural heritage through conserving and enhancing the historic character of the town (SA Objective 1).

E.5.4 Policy DLPH4 – Halesowen Town Design – Landmarks, Views, Vistas and Gateways

Policy DLPH4 – Halesowen Town Design – Landmarks, Views, Vistas and Gateways

All new development should have regard to Policy DLP4, Policy DLP39 and Policy DLP55 to deliver high quality design.

New development and proposed alterations to existing buildings should:

Policy DLP4 – Halesowen Town Design – Landmarks, Views, Vistas and Gateways

- Enhance the sense of arrival by improving existing gateways and where appropriate create new ones that reinforce principal routes and spaces (see also Policy DLP4).
- Create architectural corner features and new landmark features to improve the understanding of the town where appropriate;
- Safeguard and enhance local and important views, vistas, landmarks and gateways within and at the edges of the town centre.
- Protect key gateway buildings that give the town character and respect building lines, where appropriate, to assist the continuity of the town's heritage and help secure and improve views and vistas.
- Respect the height and mass and visibility of existing Halesowen landmarks. Such landmarks should not be overwhelmed by new development nor their setting compromised. Consideration of the effect on setting has regard to the importance of the landmark, the extent of any harm, and the benefit arising from development.
- Ensure that new buildings have a scale, mass, height and impact that is responsive to its context and sensitive to its roofscape/skyline.
- Create variations in roofscape that will respect important local and strategic views.
- Ensure that larger development facades and rooflines should reduce their scale and massing by subdividing into smaller architectural elements.

Where new development is likely to have an impact on an identified view, skyline or landmark, accurate visual representations will be required as part of any development proposals. Choice of materials and finishes need careful consideration in order to protect and enhance the existing design context.

The following landmarks, gateways, views, and vistas should be protected and enhanced where possible in accordance with the above Policy considerations:

Strategic Landmark (Positive):

- SLP1- Church of St. John the Baptist

Local Landmarks (Positive):

- LLP1- Somers Square (Hagley Street/Great Cornbow)
- LLP2- Hobbs, 27 Great Cornbow - office of Halesowen BID
- LLP3- The Lyttleton Arms (former) & 87-89 High Street (*no. 15 Halesowen Architectural Heritage Trail*)
- LLP4- Former Methodist Church, Birmingham Street (*no. 16 Halesowen Architectural Heritage Trail*) – known locally as Benjamins after a former occupier (now vacant)
- LLP5- Whitefriars, 6-8 Church Lane (*no. 19 Halesowen Architectural Heritage Trail*)
- LLP6- 32 High Street (currently Little Acorns)
- LLP7- The George Inn, 16 High Street (*no. 28 Halesowen Architectural Heritage Trail*)
- LLP8- Church of St. John the Baptist Mortuary Chapel, Hales Road (*no. 31 Halesowen Architectural Heritage Trail*)
- LLP9- Cornbow Bridge (*no. 9 Halesowen Architectural Heritage Trail - start of walking routes from Halesowen Town Centre to either The Leasowes; or to Old Hill Station, Hawne Basin/Dudley No. 2 Canal Walks and Coombeswood Walks*)
- LLP10- Meriden House, 6 Great Cornbow (former Fox Inn) (*no. 11 Halesowen Architectural Heritage Trail*)
- LLP11- 1 Summer Hill, former bank (currently Jordans Solicitors)

Edge Gateway:

Policy DLP4 – Halesowen Town Design – Landmarks, Views, Vistas and Gateways

- EG1- Halesowen bus station
- EG2- A458 Stourbridge Road / Furnace Lane / Grammar School Lane / A458 Earls Way island
- EG3- Rumbow (from A458)
- EG4- Grange Road junction with the Queensway (pedestrian entrance via subway link under the Queensway & vehicular entrance via primary roads)
- EG5- A459 Queensway / B4183 Hagley Road island
- EG6- Laurel Lane (pedestrian entrance via subway link under the Queensway)
- EG7- Summer Hill (pedestrian entrance via controlled crossing point over the Queensway)

Inner Gateway:

- IG1- Bull Ring

Development should have regard to and respect the following important views and vistas:

Panoramic Views (View Cone) in/out of Halesowen:

- PV1- From Hagley Road to St. John the Baptist’s Church
- PV2- From Bundle Hill looking eastwards over Highfields Estate to The Queensway/Bromsgrove Road
- PV3- From Furnace Lane to St. John the Baptist’s Church
- PV4- From Earls Way to St. John the Baptist’s Church

Strategic View:

- SV1- From Highfields Park, looking northeast over Highfields Estate to St. John the Baptist’s Church
- SV2- From Stourbridge Road to St. John the Baptist’s Church
- SV3- From Furnace Lane to St. John the Baptist’s Church
- SV4- From the junction of Siviter Street/Cobham Road looking southwest to St. John the Baptist’s Church

9) Vista:

- V1- Laurel Lane to Queensway
- V2- Cornbow Bridge to Little Cornbow
- V3- White Friars to St. John the Baptist’s Church

10) Local View:

- LV1- Summer Hill to High Street (in both directions)
- LV2- Rumbow to St. John the Baptist’s Church
- LV3- Bull Ring to St. John the Baptist’s Church
- LV4- Cobham Road, looking northwest over the River Stour to St. John the Baptist’s Church
- LV5- Birmingham Street to St. John the Baptist’s Church
- LV6- Centre Lane to St. John the Baptist’s Church
- LV7- Cornbow Bridge to Little Cornbow/Bull Ring

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLP4	+	+	0	0	0	0	0	0	0	0	0	0	0	0

- E.5.4.1 Policy DLP4 aims to protect the identity and character of Halesowen Town Centre through identifying key landmarks that should be protected and enhanced and provides requirements on the design of development proposals.
- E.5.4.2 The policy provides requirements for development proposals to be of *"high quality design"* aiming to *"safeguard and enhance local and important views, vistas, landmarks and gateways"*. The policy also requires developments to be in keeping with the town character and respect landmarks, with careful consideration of design including building materials, that will help to protect the visual amenity of the town centre. Therefore, the policy can be expected to have a minor positive impact on the local character of the town centre (SA Objective 2).
- E.5.4.3 The policy states that *"landmarks should not be overwhelmed by new development, nor their setting compromised"*, and identifies a range of specific views and landmarks to consider, some of which relate to Listed Buildings. Therefore, the policy would be expected to have a minor positive impact on cultural heritage (SA Objective 1). However, the policy would benefit from stronger wording, referring to *"heritage assets"* and their settings where applicable in relation to the identified landmarks, in accordance with the NPPF. Stronger referencing to cultural heritage throughout the policy would be beneficial and ensure that cultural heritage is being pursued throughout strategic objectives within the Local Plan.

E.5.5 Policy DLP5 – Public Realm in Halesowen

Policy DLP5 – Public Realm in Halesowen

The quality of streets and open spaces will be improved through development proposals or local initiatives having regard to the following measures:

- The provision of high-quality hard landscape, street furniture, lighting, signage and public art to help create a clear identity for Halesowen Town Centre. Developers are encouraged to prepare strategies to coordinate the choice and location of these features, including their role in linking places.
- Mature tree planting and other landscape elements to assist the 'greening' and ecological enhancement of the Town Centre.
- Streets and spaces will be designed so that pedestrians, cyclists, people with disabilities and vehicles can mix safely.
- Landscape proposals should create a safe, attractive and comfortable external environment for all to enjoy, where the safety and security of people and properties is not compromised.
- All new development and townscape and landscape enhancements are required to be designed with ease of access for all users as a prime consideration at the outset. Proposals should be in accordance with Dudley Council's Access for All Supplementary Planning Document and are required to incorporate an Access Statement that shows how the principles of inclusive design have been integrated.
- Existing landscape features will be protected where they make a significant contribution to the street scene.
- Development in the vicinity of the various green spaces and features that already exist and those identified for improvement or enhancement on the Policies Map will be required to preserve their landscape character.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH5	0	+	+	0	0	0	0	0	+	0	+	+	0	0

E.5.5.1 Policy DLPH5 aims to provide uplift to the public realm of Halesowen Town Centre through enhancing the visual appeal and improving accessibility.

E.5.5.2 The policy encourages improvements to the public realm which will create a clear identity for Halesowen Town Centre, through requiring *"high-quality hard landscape, street furniture, lighting, signage and public art"*. The policy requires development proposals and local initiatives to *"preserve"* the landscape and townscape character and therefore a minor positive impact on the landscape would be expected (SA Objective 2).

E.5.5.3 Through the *"greening and ecological advancement of the Town Centre"*, the biodiversity value including BNG uplift associated with new developments could be improved, alongside promoting habitat connectivity. Therefore, the policy can be expected to have a minor positive impact on local biodiversity (SA Objective 3).

E.5.5.4 The public realm will be improved in regard to accessibility and creating a *"safe, attractive and comfortable external environment for all to enjoy"*. The policy aims to ensure that active modes of transport can be present alongside vehicle use, whilst ensuring people with disabilities can also benefit from street spaces in line with the Access for All SPD. Public health would benefit from the improvements to spaces that would encourage active transport by promoting active lifestyles. Overall, the policy would be likely to have a minor positive impact on transport, equality and health (SA Objective 9, 11 and 12).

E.5.6 Policy DLPH6 – Landscape and Public Realm/Open Space Network in Halesowen

Policy DLPH6 – Landscape and Public Realm/Open Space Network in Halesowen

Development should safeguard existing open space provision from loss or harm and provide new spaces to create a hierarchy of inspiring landscape and public realm projects to form a unique selling point for and improve the image of Halesowen Town Centre.

Development proposals should:

- a. Consider and provide ways of increasing the amount of on-site amenity green space and publicly accessible natural and semi-natural green space within the Town Centre (in particular at the north-eastern area of the Town Centre). Dudley Council's 'Open Space, Sport and Recreation' Supplementary Planning Document gives further guidance.
- b. Provide a hierarchy of external spaces that have clarity of purpose and function, demonstrating an understanding of the need for the retention of existing or creation of new landscape elements and spaces.

Policy DLPH6 – Landscape and Public Realm/Open Space Network in Halesowen

- c. Provide a range for choice and opportunity for children’s play, including for children with disabilities where appropriate.
- d. Reflect and enhance the local identity of parks, open spaces and the public realm.
- e. Make the most of past heritage by retaining and integrating structures that can become the focus and setting for newly created or re-invigorated landscapes and public realm.
- f. Integrate green infrastructure within the building design as an intrinsic part of the scheme's landscape strategy and enhancement of biodiversity. Green infrastructure includes such things as green roof and wall technology, and sustainable drainage.
- g. Be adaptable and flexible to changing social, physical and environmental needs.
- h. Provide spaces that help link communities together and reduce severance, seek opportunities for environmental enhancement of the connections, create connections where sections are missing, encourage public use or enhance their value for biodiversity as appropriate.
- i. Employ remediation techniques where possible to bring contaminated and lower quality land back into use.

The following public open spaces, as shown on the Landscape and Public Realm Map, will be protected, enhanced or created as part of development proposals and other initiatives:

- Queensway south of St. John the Baptist's Church (enhanced space)
- The River Stour (created and enhanced space) as part of a new bridge connection gateway space
- Summer Hill (created space)
- Great Cornbow, Little Cornbow and Bull Ring (enhanced space)
- Rumbow/Fingerpost Gardens (enhanced)
- Hagley Road (enhanced space)
- Birmingham Road (enhanced space)
- St John the Baptist Church and wider cemetery/graveyard (protected space)
- White Friars and environs (protected space)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH6	+	+	+	0	0	+	0	0	0	0	+	+	0	0

E.5.6.1 Policy DLPH6 sets out requirements of development proposals in regard to improving the open spaces and public realm within Halesowen Town Centre.

E.5.6.2 The policy states that development proposals should "*reflect and enhance the local identity of parks, open spaces and the public realm*" and make use of the material assets within the area, utilising lower quality or contaminated land within the area. The policy also identifies public open spaces to be protected and where possible enhanced. Therefore, the policy can be expected to have a minor positive impact on the landscape and natural resources within the area (SA Objectives 2 and 6).

- E.5.6.3 The policy states that developments should “*make the most of past heritage by retaining and integrating structures that can become the focus and setting for newly created or re-invigorated landscapes and public realm*”; this could therefore help to better reveal or improve understanding of heritage assets and the historic environment, with potential to achieve a minor positive impact on cultural heritage (SA Objective 1).
- E.5.6.4 The policy requires development proposals to incorporate green spaces within the town centre, alongside integrating green infrastructure within design elements, including “*green roof, wall technology, and sustainable drainage*”. These requirements can positively impact the local biodiversity within the area through BNG uplift, creating GI networks and improving habitat connectivity. Therefore, the policy would be expected to have a minor positive impact on local biodiversity (SA Objective 3).
- E.5.6.5 Providing green and open space can have positive effects on public health, where it would be likely to facilitate healthy lifestyles, through promoting outdoor exercise and leading to benefits for the mental wellbeing of residents. The policy also promotes incorporation of amenity open space in line with the Open Space, Sport and Recreation SPD, providing opportunities for recreation and exercise. Therefore, the policy can be expected to have a minor positive impact on public health (SA Objective 12).
- E.5.6.6 The policy requires spaces to “*link communities together*” which could potentially improve the overall social cohesion of the area. Spaces are to be adaptive to certain needs, such as meeting the needs of children with disabilities where appropriate. The policy would therefore be expected to have a minor positive impact on social cohesion and equal opportunities to enjoy open space within the area (SA Objective 11).

E.5.7 Policy DLP7 – Conservation and Enhancement of Local Character and Distinctiveness in Halesowen

Policy DLP7 – Conservation and Enhancement of Local Character and Distinctiveness in Halesowen

All development proposals should take account of the locally distinctive character of the area in which they are to be sited, including its historic character, and should respect and respond to its positive attributes. Physical assets (buildings, sites or areas together with their settings) whether man-made or natural that positively contribute to the local character and distinctiveness of Halesowen’s landscape and townscape should be retained and wherever possible enhanced and their settings be respected.

New development in Halesowen should be designed so as to reinforce and enhance local distinctiveness and full reference should be made in Design and Access Statements accompanying planning applications to the Halesowen Urban Historic Landscape Characterisation. Design and Access Statements should clearly set out the steps that have been taken to achieve locally responsive outcomes through either traditional or more contemporary design solutions.

In respect of major individual developments or in relation to particularly environmentally sensitive areas, developers may in future themselves be required to commission more detailed “Local Area Character Appraisals” (as defined in the Dudley Historic Environment supplementary planning document, SPD) in order to inform specific land use proposals more fully.

In cases where changes of character or demolition are unavoidable Dudley Council will seek to ensure that provision is made for an appropriate level of archaeological recording to take place prior to the alteration of the features concerned.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH7	+	+	0	0	0	0	0	0	0	0	0	0	0	0

E.5.7.1 Policy DLPH7 provides requirements for development proposals within Halesowen to ensure the local character and distinctiveness of the area are respected and where possible enhanced.

E.5.7.2 The policy states that *"Halesowen's landscape and townscape should be retained and wherever possible enhanced and their settings be respected"*. Development proposals will then be required to protect and enhance the character of the landscape and will also protect visual amenity through retaining and enhancing physical assets and their settings. Therefore, the policy can be expected to have a minor positive impact on the landscape of the area (SA Objective 2).

E.5.7.3 Furthermore, under the policy, development proposals would be required to make reference to the UHLC information to demonstrate how the design has responded to the locality. As such, a minor positive impact could be achieved regarding cultural heritage (SA Objective 1). However, stronger wording on *"physical assets"* and providing clarification on what these assets are would benefit the policy, including whether this encompasses heritage assets. It is recommended to use the term "heritage assets" which reflects the wording in the NPPF¹⁶. Cross-reference could be made to historic environment policies within the DLP.

E.5.8 Policy DLPH8 – Access and Movement in Halesowen

Policy DLPH8 – Access and Movement in Halesowen

All development should retain and improve all useful, safe and appropriate vehicular and pedestrian routes. Development should provide new routes that make access and movement easier, safer, more attractive and visually varied through and within built up areas.

Development should ensure that:

- Streets link up and layouts are designed to encourage safer walking, cycling, use by people with disabilities, and access to public transport.
- Direct, convenient and safe access is provided for pedestrians, cyclists and people with disabilities.
- In new areas of residential development, new streets should be designed to prioritise pedestrians, cyclists and people with disabilities.
- All development and townscape and landscape enhancements should seek to incorporate measures for the ease of access of everybody. This will ensure unhindered movement for everyone to and within Halesowen Town Centre and also along the River Stour corridor pathways. It will enable people with disabilities, the elderly and the infirm to have ease of access to, and avail themselves of, the

¹⁶ DLUHC (2023) National Planning Policy Framework. Available at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 20/09/23]

Policy DLPH8 – Access and Movement in Halesowen

facilities provided within the Town Centre. Proposals should be in accordance with Dudley Council's Access for All Supplementary Planning Document and are required to incorporate an Access Statement that shows how the principles of inclusive design have been integrated.

- In some instances, a proposal may have substantial benefits to the wider local community but may not be able to achieve full accessibility due to heritage assets status and therefore a considered pragmatic approach may be adopted.
- A riverside walk should be delivered along the River Stour from Great Cornbow to Rumbow. The implementation of this route may be in phases as and when redevelopment opportunities occur.

Additionally, carriageway and river crossing points will be improved in the locations listed below that will help to improve pedestrian access and movement. Dudley Council will require that proposed development schemes contribute towards the delivery of these improvements where appropriate:

- Birmingham Street north of Great Cornbow/Bull Ring;
- Rumbow between Church Lane and Siviter Street;
- Linkage between Birmingham Street and Cobham Road/Centre Lane across the River Stour;
- Queensway/Summer Hill crossing point and ramped access and Laurel Lane/Pool Road connections to be improved in conjunction with the redevelopment of Pool Road Car Park opportunity site;
- Queensway/Grange Road junction to improve access to the southern stretch of the River Stour

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPH8	0	+	0	0	0	0	0	0	++	0	+	+	0	0

E.5.8.1 Policy DLPH8 aims to create accessible spaces and encourage the use of sustainable methods of transport within Halesowen, meeting the needs of residents. The design of development proposals will encourage *"safer walking, cycling, use by people with disabilities and access to public transport"*. The policy focuses on supporting unhindered movement that provides access to all residents, *"enabling people with disabilities, the elderly and the infirm to have ease of access"*. Development proposals are to prioritise pedestrians, cyclists, and people with disabilities, enabling a more active lifestyle and greater opportunity to reach public services. The policy can therefore be expected to have a major positive impact on transport and accessibility within the area (SA Objective 9) and a minor positive impact on equality and public health (SA Objective 11 and 12).

E.5.8.2 The policy includes measures that will improve access to the River Stour through the addition of a riverside walk and river crossing points. These measures will be likely to provide indirect benefits to the public realm and enhance the appearance and visual amenity of the area. Therefore, a minor positive impact on landscape would be expected (SA Objective 2).

E.5.9 Policy DLPHOS1 – Development Opportunity Site 1: Trinity Point

Policy DLPHOS1 – Development Opportunity Site 1: Trinity Point

Acceptable Land Uses

- Class E- Commercial, Business and Service uses excluding uses falling within Class E (g) (ii) and (iii) uses in line with Policy DLP24.
- Residential developments (Class C3) with an indicative capacity of 87 dwellings, but this capacity may vary as part of any mixed use development on the site.
- Local Community and Learning uses (class F1&F2).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPHOS1	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++

E.5.9.1 Policy DLPHOS1 sets out the preferred allocation for the Site 'Trinity Point and High Street Car Park' which has been assessed within the SA process as a reasonable alternative site known as Site DLPHOS1. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.5.9.2 The site has a residential capacity of 87 homes and would be expected to have a positive impact on housing provision within the borough and provide accessible homes, located in close proximity to local services and public transport networks. Overall, the site would be expected to have a minor positive impact on housing provision (SA Objective 10) and a minor positive impact on equality (SA Objective 11).

E.5.9.3 The site is located on brownfield land that is within a highly urbanised area; therefore, it does not contain any BMV land. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).

E.5.9.4 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. Furthermore, the site identifies "*local community and learning (F1&F2)*" as acceptable uses and would result in additional educational facilities. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond the sustainable distance of 2km from the nearest railway station. The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. Overall, the policy would be expected to have a major positive impact on access to education (SA Objective 14), a negligible on climate change mitigation (SA Objective 4), and a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with

- the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.5.9.5 The site is located beyond 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The policy would benefit from stronger wording in relation to the accessibility to healthcare infrastructure and would benefit from cross referencing to the relevant DLP policies, including DLP9. The policy could potentially have a minor negative impact on health (SA Objective 12).
- E.5.9.6 The site coincides and is within close proximity to several heritage assets, located approximately 50m from the Grade I Listed Building 'St John the Baptist Church', adjacent to the Grade II Listed Building 'Ivy House' and coinciding with the Halesowen Medieval Town Centre APA. These heritage assets would be expected to contribute to the local landscape character. The policy should provide wording to ensure that both the assets and their settings will be conserved and enhanced alongside the proposed development. Overall, the proposed development could potentially lead to a minor negative impact on cultural heritage (SA Objective 1) and a negligible impact on the local landscape (SA Objective 2).
- E.5.9.7 The site is adjacent to the 'Stour Valley' SLINC. Whilst a non-statutory designation, the habitats within these should be safeguarded and the habitat corridors and networks they support should be enhanced. The policy would benefit from stronger wording relating to the consideration of local biodiversity, and cross referencing to relevant DLP policies would be beneficial, such as DLP31 and DLP32. Overall, the proposed development could potentially have a minor negative impact on local biodiversity (SA Objective 3).
- E.5.9.8 The policy states that acceptable uses would comprise "*commercial, business and service*" which could increase job provision and employment floorspace. However, the residential development at this site could result in a loss of current employment floorspace at the site. Therefore, the overall net change in employment floorspace is uncertain (SA Objective 13).
- E.5.9.9 The site is located within Dudley AQMA, is located within 200m of New Road (A458) and proposes an indicative capacity of 87 residential homes that would be expected to have a minor negative impact on air quality. Additionally, the site is within 10m of the River Stour, which could lead to negative impacts on water quality through contamination and runoff during both construction and occupation. Measures to avoid or minimise the impacts on air quality and water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and water purification. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).
- E.5.9.10 The site contains some areas of low surface water flood risk. The policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial.

Overall, the proposed development could potentially have a minor negative impact on climate change adaptation (SA Objective 5).

E.5.9.11 The policy proposes the development of 87 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.5.10 Policy DLPHOS2 – Development Opportunity Site 2: Link House and Pioneer House

Policy DLPHOS2 - Development Opportunity Site 2: Link House and Pioneer House

Acceptable Land Uses

Mixed Use Development including:

- a. Class E- Commercial, Business and Service uses, excluding uses falling within Class E (g) (ii) and (iii) uses.
- b. Residential developments (class C2/C3) with an indicative capacity of 20 dwellings, but this capacity may vary as part of any mixed use developments on the site.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPHOS2	-	0	-	0	--	-	-	0	0	+	+	-	+/-	++

E.5.10.1 Policy DLPHOS2 sets out the preferred allocation for the Site 'Link House and Pioneer House' which has been assessed within the SA process as a reasonable alternative site known as DLPHOS2. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.5.10.2 The site has an indicative residential capacity of 20 homes and would be expected to have a positive impact on housing provision within the borough and provide accessible homes, located in close proximity to local services and public transport networks. The site would be expected to have a minor positive impact on housing provision (SA Objective 10) and equality (SA Objective 11).

E.5.10.3 The site is located primarily on previously developed land although there are some areas of undeveloped land to the north east edges of the site. Therefore, the proposed development could potentially result in the loss of environmentally valuable soil, to some extent. A minor negative impact on natural resources would be expected (SA Objective 6).

E.5.10.4 The site coincides within the 'Halesowen Medieval Town Centre' APA, which would be expected to contribute to the local landscape character. The policy should provide wording

to ensure that the historic character of the APA is conserved and enhanced alongside the proposed development. The proposed development could potentially result in a minor negative impact on cultural heritage (SA Objective 1) and a negligible impact on the local landscape (SA Objective 2).

- E.5.10.5 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. The site is located within sustainable walking distance and public transport distance to primary and secondary schools. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond the sustainable distance of 2km from the nearest railway station. Overall, the policy would be expected to have a major positive impact on education (SA Objective 14), and a negligible impact on climate change mitigation (SA Objective 4). The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.5.10.6 The site is adjacent to the 'Stour Valley' SLINC. Whilst a non-statutory designation, the habitats within these should be safeguarded and the habitat corridors and networks they support should be enhanced. The policy would benefit from stronger wording relating to the consideration of local biodiversity, whereby cross referencing to relevant DLP policies would be beneficial, such as DLP31 and DLP32. The proposed development could potentially have a minor negative impact on local biodiversity (SA Objective 3).
- E.5.10.7 The site is located beyond 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The policy would benefit from stronger wording in relation to the accessibility to healthcare infrastructure and would benefit from cross referencing to the relevant DLP policies, including DLP9. Therefore, the policy would be expected to have a minor negative impact on health (SA Objective 12).
- E.5.10.8 The site is located within Dudley AQMA, is located within 200m of Queensway (A459) and proposes an indicative capacity of 20 residential homes that would be expected to have a minor negative impact on air quality. Additionally, the site is within 10m of the River Stour, which could lead to negative impacts on water quality through contamination and runoff during both construction and occupation. Measures to avoid or minimise the impacts on air quality and water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and water purification. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).
- E.5.10.9 The site contains some areas of medium and low surface water flood risk. Furthermore, the site is partially located within Flood Zones 2 and 3 and could potentially locate some residents in areas at risk of flooding. The policy would benefit from stronger wording on

how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, the policy would be expected to have a major negative impact on climate change adaptation (SA Objective 5).

E.5.10.10 The policy proposes the development of 20 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.5.10.11 The policy states that acceptable uses alongside residential are "commercial, business and service". The site currently comprises employment land, however, it is unknown whether the land is active employment land, and it is uncertain whether there would be a net change in employment land and job opportunities (SA Objective 13).

E.5.11 Policy DLPHOS3 – Development Opportunity Site 3: Little Cornbow

Policy DLPHOS3 - Development Opportunity Site 3: Little Cornbow

Acceptable Land Uses

Mixed Use Development:

- a. Class E – Commercial, Business and service uses, excluding uses falling within Class E (g) (ii) and (iii) uses.
- b. Residential developments (Class C3) with an indicative capacity of 43 dwellings, but this capacity may vary as part of any mixed use developments on the site
- c. Local Community and Learning uses (F1 and F2).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPHOS3	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++

E.5.11.1 Policy DLPHOS3 sets out the preferred allocation for the Site 'Little Cornbow' which has been assessed within the SA process as a reasonable alternative site known as Site DLPHOS3. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.

E.5.11.2 The site has an indicative residential capacity of 43 homes and would be expected to have a positive impact on housing provision within the borough and provide accessible homes, located in close proximity to local services and public transport networks. A minor positive impact on housing provision (SA Objective 10) and equality (SA Objective 11) would be likely.

- E.5.11.3 The site is located on brownfield land that is within a highly urbanised area. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.5.11.4 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. Furthermore, the policy identifies "*local community and learning (F1&F2)*" as acceptable uses and would result in additional educational facilities. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond 2km from the nearest railway station. Overall, the policy would be expected to have a major positive impact on education (SA Objective 14), and a negligible impact on climate change mitigation (SA Objective 4). The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.5.11.5 The site coincides within the 'Halesowen Medieval Town Centre' APA, which would be expected to contribute to the local landscape character. The policy should provide wording to ensure that the historic character of the APA is conserved and enhanced alongside the proposed development. The proposed development could potentially have a minor negative impact on cultural heritage (SA Objective 1) and a negligible impact on the local landscape (SA Objective 2).
- E.5.11.6 The site is adjacent to the 'Stour Valley' SLINC. Whilst a non-statutory designation, the habitats within these should be safeguarded and the habitat corridors and networks they support should be enhanced. The policy would benefit from stronger wording relating to the consideration of local biodiversity, whereby cross referencing to relevant DLP policies would be beneficial, such as DLP31 and DLP32. Overall, the proposed development could potentially have a minor negative impact on local biodiversity (SA Objective 3).
- E.5.11.7 The site is located beyond 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital, although the site is located within a sustainable travel time to GP surgeries. The policy would benefit from stronger wording in relation to the accessibility to healthcare infrastructure and would benefit from cross referencing to the relevant DLP policies, including DLP9. Overall, the proposed development could potentially have a minor negative impact on health (SA Objective 12).
- E.5.11.8 The site is located within Dudley AQMA, is located within 200m of Queensway (A459) and proposes an indicative capacity of 43 residential homes that would be expected to have a minor negative impact on air quality. Additionally, the site is within 10m of the River Stour, which could lead to negative impacts on water quality through contamination and runoff during both construction and occupation. Measures to avoid or minimise the impacts on air quality and water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies

mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and water purification. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).

E.5.11.9 The policy proposes the development of 43 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.

E.5.11.10 The site is located within areas of low and medium surface water flood risk and could potentially locate some residents in areas at risk of flooding. The policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, the policy could potentially have a minor negative impact on climate change adaptation (SA Objective 5).

E.5.11.11 The policy states that acceptable uses alongside residential and local community and learning are "*commercial, business and service*". The site currently comprises employment land, however, it is uncertain whether the land is active employment land, and it is uncertain whether there would be a net change in employment land and job opportunities (SA Objective 13).

E.5.12 Policy DLPHOS4 – Development Opportunity Site 4: Fountain House

Policy DLPHOS4 - Development Opportunity Site 4: Fountain House

Acceptable Land Uses

Mixed use development including:

- a. Class E – Commercial, Business and service uses, excluding uses falling within Class E (g) (ii) and (iii) uses.
- b. Residential developments (Class C3) with an indicative capacity of 60 dwellings, but this capacity may vary as part of any mixed use developments on the site
- c. Local Community and Learning uses (F1 and F2).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPHOS4	-	0	-	0	-	+	-	0	0	+	+	-	+/-	++

- E.5.12.1 Policy DLPHOS4 sets out the preferred allocation for the Site 'Fountain House', which has been assessed within the SA process as a reasonable alternative site known as DLPHOS4. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.5.12.2 The site has an indicative residential capacity of 60 homes and would be expected to have a positive impact on housing provision within the borough and provide accessible homes, located in close proximity to local services and public transport networks. The site would be expected to have a minor positive impact on housing provision (SA Objective 10) and a minor positive impact on equality (SA Objective 11).
- E.5.12.3 The site is located on brownfield land that is within a highly urbanised area. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.5.12.4 The site is located adjacent to the 'Halesowen Medieval Town Centre' APA, which would be expected to contribute to the local landscape character. The policy should provide wording to ensure that the historic character of the APA is conserved and enhanced alongside the proposed development. The proposed development could potentially lead to a minor negative impact on cultural heritage (SA Objective 1) and a negligible impact on the local landscape (SA Objective 2).
- E.5.12.5 The site is adjacent to the 'Stour Valley' SLINC. Whilst a non-statutory designation, the habitats within SLINCs should be safeguarded and the habitat corridors and networks they support should be enhanced. The policy would benefit from stronger wording relating to the consideration of local biodiversity, whereby cross referencing to relevant DLP policies would be beneficial, such as DLP31 and DLP32. Overall, the proposed development could potentially have a minor negative impact on local biodiversity (SA Objective 3).
- E.5.12.6 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond the sustainable distance of 2km from the nearest railway station. Furthermore, the site identifies "*local community and learning (F1&F2)*" as an acceptable use and would result in additional educational facilities. Overall, the policy would be expected to have a major positive impact on education (SA Objective 14), and a negligible impact on climate change mitigation (SA Objective 4). The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.5.12.7 The site is located beyond 5km of the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The policy would benefit from stronger wording in relation to the accessibility to healthcare infrastructure and would benefit from cross referencing to the relevant DLP policies, including DLP9. Therefore, the policy would be expected to have a minor negative impact on health (SA Objective 12).

- E.5.12.8 The site is located within Dudley AQMA, is located within 200m of Queensway (A459) and proposes an indicative capacity of 60 residential homes that would be expected to have a minor negative impact on air quality. Additionally, the site is within 10m of the River Stour, and so the proposed development at this site could lead to negative impacts on water quality through contamination and runoff during both construction and occupation. Measures to avoid or minimise the impacts on air quality and water contamination could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of enhanced green cover to provide ecosystem services such as carbon sequestration and water purification. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).
- E.5.12.9 The site has low proportions of surface water flood risk and could be expected to locate some residents in areas of flood risk. The policy would benefit from stronger wording on how the proposed development can adapt to the impacts of climate change. The policy would benefit from including measures that ensure green cover and the implementation of adaptive technologies such as SuDS and passive heating and cooling systems. Cross reference to Policies DLP43 and DLP46 would be beneficial. Overall, the policy would be expected to have a minor negative impact on climate change adaptation (SA Objective 5).
- E.5.12.10 The policy proposes the development of 60 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.5.12.11 The policy states that acceptable uses alongside residential and local community and learning are "*commercial, business and service*". The site currently comprises employment land, and it is uncertain whether there would be a net change in employment land and job opportunities as a result of the proposed allocation (SA Objective 13).

E.5.13 Policy DLPHOS5 – Development Opportunity Site 5: Pool Road Car Park

Policy DLPHOS5 – Development Opportunity Site 5: Pool Road Car Park

Acceptable Land Uses

Mixed use development including:

- a. Class E – Commercial, Business and service uses, excluding uses falling within Class E (g) (ii) and (iii) uses.
- b. Residential developments (Class C3) with an indicative capacity of 30 dwellings, but this capacity may vary as part of any mixed use developments on the site
- c. Local Community and Learning uses (F1 and F2)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPHOS5	0	+	+	0	+	+	-	0	0	+	+	-	++	++

- E.5.13.1 Policy DLPHOS5 sets out the preferred allocation for the Site 'Pool Road Car Park', which has been assessed within the SA process as a reasonable alternative site known as DLPHOS5. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.5.13.2 The site has an indicative residential capacity of 30 homes and would be expected to have a positive impact on housing provision within the borough and provide accessible homes, located in close proximity to local services and public transport networks. The site would be expected to have a minor positive impact on housing provision (SA Objective 10) and a minor positive impact on equality (SA Objective 11).
- E.5.13.3 The site is located on brownfield land that is within a highly urbanised area; therefore, it does not contain any BMV land. The use of previously developed land would protect the undeveloped land in the borough and represent an efficient use of land. Therefore, a minor positive impact on natural resources would be expected (SA Objective 6).
- E.5.13.4 Site DLPHOS5 does not coincide with local biodiversity assets or impact any surrounding biodiversity assets. BNG would be expected to apply and measures under Policy DLP32 would be considered and applied where necessary. Therefore, Policy DLPHOS5 could potentially have a minor positive impact on local biodiversity (SA Objective 3). The policy would however benefit from stronger wording on how the proposed development would protect and enhance biodiversity, through referencing relevant DLP policies such as DLP31 and DLP32.
- E.5.13.5 A negligible impact would be expected for cultural heritage (SA Objective 1), as the site is not located in close proximity to any heritage assets. The proposed redevelopment of the current multi-storey car park on site could potentially improve the appearance and character of the local area, leading to a minor positive impact on landscape (SA Objective 2).
- E.5.13.6 The centralised location of the site ensures strong links to local services (including education facilities), public transport, active modes of travel such as walking and cycling, and therefore development at this location would support reduced reliance on private car use. Whilst the site is located in close proximity to public transport and is accessible to local services by foot, the site is however located beyond 2km from the nearest railway station. Furthermore, the site identifies "*local community and learning (F1&F2)*" as an acceptable use and could therefore result in additional educational facilities. Overall, the policy would be expected to have a major positive impact on education (SA Objective 14), and a negligible impact on climate change mitigation (SA Objective 4). The policy would benefit from stronger wording regarding transport and accessibility, and/or cross-reference to the relevant DLP policies such as DLP67. The policy would be expected to

- have a negligible impact on transport (SA Objective 9) assuming that the proposed development is in accordance with the measures to improve sustainable transport and access outlined within the relevant DLP policies such as DLP67.
- E.5.13.7 The site is located beyond the sustainable distance of 5km to the nearest NHS Hospital, with the nearest being Russells Hall Hospital. The policy would benefit from including wording in relation to the accessibility to healthcare infrastructure and would benefit from cross referencing to the relevant DLP policies, including DLP9. Overall, the policy would be expected to have a minor negative impact on health (SA Objective 12).
- E.5.13.8 The site is located within Dudley AQMA, is located within 200m of Queensway (A459) and proposes an indicative capacity of 30 residential homes that would be expected to have a minor negative impact on air quality. Measures to avoid or minimise the impacts on air quality would be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP4, DLP41 and DLP44. The policy would be strengthened from referring to the relevant policies mentioned and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration. Overall, a minor negative impact would be expected on air and water quality (SA Objective 7).
- E.5.13.9 The site is located within Flood Zone 1 and is not located on areas of surface water flood risk. The policy would however benefit from including measures that ensure green cover and the implementation of adaptive technologies such as passive heating and cooling systems, ensuring that the impacts of climate change are considered and opportunities are sought to improve energy efficiency; therefore, cross referencing to Policies DLP43 and DLP46 would be beneficial. Overall, the policy could potentially have a minor positive impact on climate change adaptation (SA Objective 5).
- E.5.13.10 The policy proposes 30 residential homes and would be expected to have a negligible impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.5.13.11 The policy states that acceptable uses alongside residential and local community and learning are "*commercial, business and service*". The site is located on previously developed land, comprising a multi-storey car park, and as such the proposed development would be likely to result in a net gain in employment floorspace resulting in a major positive impact on employment land and job opportunities (SA Objective 13).

E.6 Housing Allocations

E.6.1 Policy DLPKQH1 – Land at Ketley Quarry, Kingswinford

Policy DLPKQH1 - Land at Ketley Quarry, Kingswinford

[See DLP for sites plan]

- 1) Land at Ketley Quarry, Kingswinford will be allocated for new residential growth. The site's gross area is 21.37ha of which 14.90ha developable for up to 600 dwellings based on 40-45dph.
- 2) The estimated phasing of delivery is:
 - 2025/26 – 40 units
 - 2026/27 – 40 units
 - 2027/28 – 40 Units
 - 2028/33 – 240 units
 - 2033/38 – 240 units
 - 2038/41 – 50 units
- 3) There will be a requirement for the development of the site to deliver homes and infrastructure of the highest quality design and functionality, and to accommodate the required infrastructure provision in appropriate locations. The key planning requirements for the Ketley Quarry priority site are set out below. Other standard policy requirements, as set out in the DLP, other local plan documents and SPD's, will also apply.
- 4) The cumulative impact of Ketley Quarry and other nearby allocations (housing and employment) will need to be considered, in terms of:
 - School place impacts;
 - Highways impacts;
 - Delivery of biodiversity net gain;
 - Delivery of recreational open space improvements
- 5) Once the DLP has been adopted, the allocation should be developed in accordance with the criteria identified in respect of all other relevant general policy requirements, including any necessary developer contributions.
- 6) **School Place Requirements**
 - a. It is currently anticipated that both primary and secondary school place requirements arising from housing developments in the northwest of Dudley over the Plan period will be capable of being met through extensions to existing primary and secondary schools. Pedestrian and public transport improvements to increase accessibility to local primary and secondary schools may be required in accordance with Policy DLP11.
- 7) **Highways Requirements**
 - a. Highway infrastructure is necessary for any development to function effectively and to minimise impacts on surrounding road junctions. It is considered that there should be vehicular access. The number of access points required, and their precise location should be subject to further detailed transport assessment. A cycling and walking network which includes active travel routes around priority sites should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres.
- 8) **Nature Conservation and Net Biodiversity Gain Requirements**
 - a. There is a statutory designation for features of geological significance (SSSI) at the north of the site. The SSSI designation is a geological outcrop of the Etruria Formation, created during the

Policy DLPKQH1 - Land at Ketley Quarry, Kingswinford

Carboniferous Period (359-299 million years ago). The wider site is designated as a SLINC. The vast majority of the site is a disused quarry and is made up of bare ground and large mounds of quarry spoil. Parts of the quarry have become vegetated with early successional species and tall ruderal vegetation.

- b. The disused Tansey Green branch railway line runs to the east of the site, providing a further link to Fens Pools Nature Reserve to the south. Dawley Brook to the east of the site is designated as a SINC. The site also contains three distinct areas of woodland, with the belt to the east and southwest of the site acting as a boundary feature.
- c. Bat and bird surveys, including for barn owls, will need to be carried out in the abandoned farmhouse and surrounding buildings. Other surveys such as reptile and badger surveys may also be required.
- d. Policy DLP32- Nature Recovery Network and Biodiversity Net Gain will apply to this site.

9) Historic Environment Requirements

- a. This allocation is the site of the former Ketley Colliery (HER 7963) recorded as being mostly abandoned by the production of the first edition OS in 1884. It also contains the site of Ketley Quarry (also recorded on the first edition OS), which is one of the 'Geo-sites' located within the Black Country Geopark, (see Policy DLP35)
- b. Located in the north-west corner of this allocation, adjacent to the road, is the site of a weighbridge and its associated Weights and Measures building (HER15424). The buildings first appeared on the Fourth Edition OS (1937-1948). Any proposed development should seek to incorporate these heritage assets into any future proposals for this part of the site along with suitable interpretation information.
- c. Located in the southern part of the allocation is the site of Stourbridge Extension Canal (HER 7385), built during the 1830s and opened in 1840. Proposals for the site should seek to include sympathetic ways of revealing the significance of this heritage asset.

10) Recreational Open Space Requirements

- a. It will be necessary to provide good-quality walking and cycle routes within the developments, which can provide easy, quick and safe access to nearby open spaces and the countryside.

11) Sustainable Drainage Requirements

- a. Naturalised sustainable drainage systems that are sufficient to retain greenfield runoff rates should be provided for the site, in accordance with Policy DLP46. An allowance for the space necessary to accommodate these systems has been made when defining the indicative net developable area. This allowance may be adjusted when the site is subject to a more detailed planning application.

12) Local Wastewater Treatment Capacity

- a. This site is served by Roundhill WwTW and it is not anticipated that there are any issues with the site handling additional flow during the Plan period.

13) Design principles

- a. New development will have a density of no more than 40-45dph and will also retain a network of public open space across the site. Any proposed development should create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. Layouts should incorporate 'back to back garden' housing and avoid the rear or sides of gardens facing the streets and public realm. Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts. These assets should form part of the

Policy DLPKQH1 - Land at Ketley Quarry, Kingswinford

publicly accessible open space and should not be located within any private plots, except in exceptional circumstance. Corner plots should be designed to address both aspects e.g. consider and propose a dual building frontage to minimise blank/dead frontages. All public open space should be overlooked by housing.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPKQH1	0	-	+/-	+	0	-	-	-	+	++	+	+	+	+

- E.6.1.1 Site 'Land at Ketley Quarry, Kingswinford' has been assessed within the SA process as a reasonable alternative site known as DLPKQH1. **Appendix C** of this R18 SA Report includes the assessment of this site pre-mitigation.
- E.6.1.2 Site DLPKQH1 is proposed to be allocated for new residential growth and will form part of the North West Regeneration Core Area. Approximately 600 homes are proposed for development at an average net density of 40-45 dph, providing accessible homes located in close proximity to local services, public transport and employment sites. Overall, a major positive impact on housing and equality (SA Objectives 10 and 11) and minor positive impact on equality and the economy (SA Objectives 12 and 13) would be expected as a result of the proposed development at this strategic location.
- E.6.1.3 No designated heritage assets are located in the immediate vicinity of the site, however as noted in the policy text the site comprises the former Ketley Colliery and contains several features noted on the HER, including the Ketley Quarry Geosite. With considerate planning, it is likely that there would be sufficient scope within this allocation to direct development towards locations that would minimise effects on heritage resources. Overall, a negligible impact on cultural heritage is expected (SA Objective 1).
- E.6.1.4 Policy DLPKQH1 states that public open space will be integrated into the development, and will *"create a permeable layout by connecting the surrounding vehicle roads and pedestrian routes with a network of public open space and tree-lined streets. ... Existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts"*. Subject to clarification on trees and woodland and assuming measures such as this are taken into account, it is considered that on balance there would be potential to minimise impacts on landscape and visual receptors at this strategic location. A residual minor adverse impact is identified in respect to landscape (SA Objective 2), pending further details to be specified in the pre-submission plan.
- E.6.1.5 Potential major adverse effects in relation to biodiversity were identified in the pre-mitigation SA assessment due to Ketley Claypit SSSI being located almost wholly within the north-eastern site area, which is designated for its geological interest. Ketley Quarry SINC, SLINC and geological site also lies within the site area along with deciduous

woodland which is identified as a habitat of principal importance under the NERC Act 2006¹⁷. It is recommended that developers should be encouraged to carry out a biodiversity metric calculation early in the master-planning process (e.g. once Phase 1 Habitat Survey information, other ecological survey or records centre data and indicative surface water drainage arrangements are available) to help inform the distribution of different land uses and iterative design on the site, alongside potential for mitigation as well as enhancements. The policy text also states that “*existing trees and on-site biodiversity value (according to the outcome of robust surveys) must be safeguarded and incorporated into the proposed layouts*”. At this stage impacts on biodiversity (SA Objective 3) are uncertain, based on the information available to date and that development within a proportion of the site has the potential to result in adverse impacts on the geological features for which this SSSI has been designated, as well as potentially direct and indirect impacts on biodiversity assets.

- E.6.1.6 It is noted that the site forms a former quarry. Sites which would include development of less than 20ha of undeveloped land have been assessed as having a potential minor negative on Natural Resources (SA Objective 6) in the pre-mitigation SA assessment. It should be noted that the SA assessment adheres to a precautionary approach to the definition of previously developed land in the glossary of the NPPF¹⁸.
- E.6.1.7 The site is located within Flood Zone 1. There are scattered areas of low, medium and high surface water flood risk throughout the site, focussed in the eastern area. It is anticipated that SuDS “*sufficient to retain greenfield runoff rates will be provided for the site, in accordance with Policy DLP46*”, which would be expected to minimise the extent of surface water flooding. Appropriate allowances should be put in place for climate change. Assuming that these measures are put in place, this would lead to an overall negligible impact on flooding and climate change adaptation (SA Objective 5).
- E.6.1.8 The site is located within an AQMA and within 200m of Dudley Road (A4101). The policy proposes 600 homes for development which would be expected to have a major negative impact on air pollution. Measures to avoid or minimise the impacts on air quality during construction and operation could be secured by consideration of the measures and requirements of other relevant policies within the DLP such as DLP44. The policy would be strengthened from referring to this and other relevant policies and including measures that would seek to reduce associated air pollutants from development, including the provision of green cover to provide ecosystem services such as carbon sequestration and storage. Overall, a minor negative impact would be expected on air pollution (SA Objective 7).

¹⁷ Natural Environment and Rural Communities Act 2006. Available at:
<https://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 14/08/23]

¹⁸ NPPF definition of Previously developed land “*Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*”

- E.6.1.9 Minor positive impacts in relation to proximity to bus stops, site pedestrian access, site road access and public transport access to local services were identified in the SA assessment at the pre-mitigation stage. Minor adverse impacts were identified in relation to access to a railway station and pedestrian access to food and local services. The policy text states that *"the number of access points required, and their precise location should be subject to further detailed transport assessment. Pedestrian and cycle infrastructure should form a key part of the site layout providing connections to all nearby local amenities, including local primary schools and local centres"*. On balance, a positive impact is identified in relation to transport (SA Objective 9), health (SA Objective 12) and climate change mitigation (SA Objective 4).
- E.6.1.10 The policy proposes the development of 600 residential homes and would be expected to have a minor negative impact on waste (SA Objective 8). Measures to avoid or minimise the impacts on waste management and waste generation could be secured through reference to other relevant policies such as DLP75.
- E.6.1.11 Minor positive impacts were identified at the pre-mitigation stage of the SA assessment process for pedestrian access to primary schools, pedestrian access to secondary schools and public transport access to secondary schools; therefore, a minor positive impact would be expected (SA Objective 14).

E.7 Local Green Space

E.7.1 Policy DLPLGS1 – Corbett Meadow Local Green Space

Policy DLPLGS1 - Corbett Meadow Local Green Space

The area shown on the Proposals Map is allocated as Corbett Meadow Local Green Space. In line with national policy the site will be protected from inappropriate development, unless there are very special circumstances that outweigh the harm to the site.

The views of the local community will also need to be taken into account when considering any development proposals on the site.

Designation of land as Local Green Space is set out in the NPPF, allowing communities to identify and protect green areas of particular importance to them. It has been demonstrated that Corbett Meadow meets the criteria set out in the NPPF. The site of the meadow was purchased by local philanthropist John Corbett in 1892 to provide a hospital and the gardens and public grounds were to be used for the purposes of a public park. The site supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DLPLGS1	0	0	+	0	0	+	0	0	0	0	0	+	0	0

- E.7.1.1 Policy DLPLGS1 identifies Corbett Meadow as a Local Green Spaces (LGS) of importance to the local community which should be conserved for the use of present and future residents.
- E.7.1.2 LGSs can help to provide important wildlife habitats and corridors within built-up areas and form part of the local GI network. The policy text notes that the site “*supports a variety of wildlife and is made up of flower-rich lowland meadow pasture, many wooded areas of veteran age and natural ponds*” which are likely to be particularly valuable in terms of local biodiversity. Protecting green spaces through LGSs would be likely to result in a minor positive impact on biodiversity (SA Objective 3).
- E.7.1.3 Policy DLPLGS1 seeks to ensure that Corbett Meadow LGS is “*protected from inappropriate development*”. This would be anticipated to have a minor positive impact on natural resources (SA Objective 6). The NPPF recognises the benefits of open space in terms of its contribution to creating sustainable patterns of urban and rural development, its role in maintaining strong and vibrant communities and the associated promotion of health and wellbeing. Allocating Corbett Meadow LGS as a “*public park*” would be anticipated to help contribute to this and therefore a minor positive impact on health (SA Objective 12) could be expected.

- E.7.1.4 This policy could be strengthened in some areas. Consideration could be given to ensure that where “*there are very special circumstances that outweigh the harm to the site*”, alternative and appropriate green space should be provided. Specification could be provided of the types of criteria that may need to be met in order to demonstrate exceptional circumstances. Proposals for the enhancement and long-term management of the LGS as part of the GI network could also be more explicitly set out within this policy or supporting text.



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