

## Appendix 7

### Summary of Main Issues Raised by Regulation 18 Consultation (Draft Black Country Plan) for Dudley Borough and the Council's Response

| <i>Sub-Areas and Site Allocations</i>                                      |                 |                |                 |
|--|-----------------|----------------|-----------------|
| <i>A. Dudley</i>   |                 |                |                 |
| <b>Policy, site allocation or main heading</b>                             | <b>Support*</b> | <b>Object*</b> | <b>Comment*</b> |
| Policy DSA1 Land South of Holbeache Lane                                   | 1               | 10,273         | 18              |
| Policy DSA2 Land at Swindon Road, (The Triangle)                           | 2               | 10,411         | 27              |
| Policy DSA3 – Land at Ketley Quarry, Kingswinford                          | 3               | 125            | 701             |
| Policy DSA4 – Corbett Meadow Local Green Space                             | 316             | 2              | 29              |
| Table 14 – Dudley Housing Allocations in the Black Country Plan            | 14              | 18,358         | 97              |
| BCP Site Ref: DUH217 – Grazing Land Wollaston Farm, Wollaston, Stourbridge | 0               | 5,424          | 19              |
| BCP Site Ref: DUH206, 207, 209 – Worcester Lane, Stourbridge               | 2               | 5,797          | 22              |
| BCP Site Ref: DUH222 – Corbyns Hall Open Space, Severn Drive, Pensnett     | 0               | 1,927          | 13              |
| BCP Site Ref: DUH216 – Bryce Road, Pensnett                                | 0               | 1,413          | 6               |
| BCP Site Ref: DUH213 – Lapwood Avenue, Kingswinford                        | 0               | 906            | 1               |
| BCP Site Ref: DUH221 – Standhills Road, Kingswinford South                 | 0               | 92             | 4               |
| BCP Site Ref: DUH218 – Lower Guys Lane, Lower Gornal                       | 0               | 132            | 3               |
| BCP Site Ref: DUH210 – Viewfield Crescent, Dudley                          | 0               | 276            | 4               |
| BCP Site Ref: DUH059 – Former New Hawne Colliery, Hayseech Road, Halesowen | 3               | 371            | 0               |
| BCP Site Ref: DUH031 – The straits, Lower Gornal                           | 0               | 18             | 0               |
| BCP Site Ref: DUH041 – Land rear of Two Gates Lane, Cradley                | 1               | 378            | 0               |
| BCP Site Ref: DUH214 – Seymour Road, Wollescote                            | 1               | 378            | 0               |
| BCP Site Ref: DUH212 – Lewis Road, Lye                                     | 0               | 30             | 0               |

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| BCP Site Ref: DUH215 – Bent Street, Brierley Hill | 0   | 33  | 0   |
| Unallocated: Halesowen Green Belt                 | 432 | 0   | 24  |
| Unallocated: Flint Fields Local Green Space       | 0   | 4   | 344 |
| Unallocated: Three Fields Local Green Space       | 0   | 116 | 6   |

\*Approximate

| Policy, Proposal or Main Heading  | Key Issues Raised by the Representations<br><i>(type of respondents which raised these issues)</i>  | Councils' Response | Proposed Change  |
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| <p>Greenbelt Release Sites</p> <ul style="list-style-type: none"> <li>• Policy DSA1 – Land South of Holbeache Lane/ Wolverhampton Road, Kingswinford</li> <li>• Policy DSA2 – Land at Swindon Road, Wall Heath, Kingswinford (The Triangle)</li> <li>• DUH217 – Grazing land Wollaston Farm, Wollaston</li> <li>• DUH206,207 &amp; 209 – Worcester Lane , Stourbridge</li> <li>• DUH214 – Seymour Road, Wollecote</li> <li>• DUH218 - Guys Lane, Lower Gornal</li> <li>• DUH210 – Viewfield Crescent, Dudley</li> </ul> | <p><b>Objections</b></p> <p>A number of objections were received against the proposed allocations of Greenbelt sites which included the following issues.</p> <ul style="list-style-type: none"> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services/ schools/ youth services/ sewage and waste/ emergency services (fear of increased crime).</li> <li>• Concerns about the impact on the existing road network, including increased congestion, accidents and lack of public transport.</li> <li>• Loss of Greenbelt (GB) land, this included that there is currently not enough open space and GB, building on this site would set a precedent for building on GB and objections over the loss of recreational and amenity value of GB/ Greenspace, including the loss of outlook/views, impact on health and loss of amenity space for walking/exercising.</li> <li>• Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release and Paragraph 175.</li> <li>• Detrimental impact on the ecology and biodiversity of the site, including loss of wildlife, habitats and flora, the impact of the hedgerows (in some sites these are designated as SLINC), loss of trees and impacts on surrounding nature conservation sites. Concerns were raised regarding the lack of ecology surveys as part of the assessment process</li> </ul> |                    | <p>The sites are not being taken forward for allocation in the Dudley Local Plan</p> |

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|  | <ul style="list-style-type: none"><li>• Development would result in the loss of Grade 2 and 3 good quality agricultural land.</li><li>• Development would result in increased pollution (air/noise/light) and have a negative impact on air quality. Concerns were raised regarding the impact on the area during constructions (e.g. dust/ air and water pollution/ increased traffic/ visuals and smells during construction)</li><li>• No economic benefit to the area, house prices of existing properties will be reduced and the new homes wont be affordable, they will be high value homes.</li><li>• Cumulative impact of other developments in the areas. For the sites located in the Kingswinford/Wall Heath ares this included comments regarding there being more developments in Kingswinford area than any other part of the borough, and result in the loss of the village feel/ change the nature of the area.</li><li>• A brownfield first approach should be taken, as its part of local and national government manifesto and CBRE have stated that there is space for a million homes on brownfield land across the country. There are still other Brownfield sites available, more building in town centres or using the existing empty dwellings including council houses, using disused commercial buildings (e.g. shops, warehouses, offices and pubs) and higher density developments on proposed brownfield site. The Midlands Mayor opposes building on GB, stating there is plenty of brownfield sites.</li><li>• Other issues raised include, concerns regarding flood risk, global warming, impact on Heritage in the areas and the surrounding landscape, impact on existing residents such as loss of privacy, existing coal mining and subsidence in the area, the site is close to an existing Gypsy and Travellers site, the designation is contrary to the Governments 25 Year Plan to protect land and that the Governments housing targets are too high and Dudley council shouldn't aim to meet them and the data used to calculate the housing need should be reviewed post Brexit and the pandemic.</li></ul> |  |  |
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| <ul style="list-style-type: none"> <li>• DUH222 – Corbyns Hall Open Space, Severn Drive, Pensnett</li> <li>• DUH 216 – Bryce Road, Pensnett</li> <li>• DUH213 – Lapwood Avenue, Kingswinford</li> <li>• DUH 221 – Standhills Road, Kingswinford South</li> <li>• DUH 212 – Lewis Road, Lye</li> <li>• DUH 215 – Bent Street, Brierley Hill</li> <li>• DUH012 – Summit Place, Gornal Wood</li> </ul> | <p><b>Objections</b><br/>A number of objections were received against the proposed allocations of these Green field sites which included the following issues.</p> <ul style="list-style-type: none"> <li>• Loss of open/amenity green space, this included that there is currently not enough open space available, building on this site would set a precedent for building on amenity greenspace and objections over the loss of recreational and amenity value of Greenspace, including the loss of outlook/views, change the existing landscape of the area, impact on health and loss of amenity space for walking/exercising.</li> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services/ schools/ sewage/ emergency services (fear of increased crime).</li> <li>• Concerns about the impact on the existing road network, including increased congestion, accidents and lack of public transport and parking.</li> <li>• Detrimental impact on the ecology and biodiversity of the site, including loss of wildlife, habitats and flora, loss of trees and impacts on surrounding nature conservation sites. Concerns were raised regarding the lack of ecology surveys as part of the assessment process.</li> <li>• A brownfield first approach should be taken, there are still other Brownfield sites available, more building in town centres or using the existing empty dwellings including council houses, using disused commercial buildings (e.g. shops, warehouses, offices and pubs) and higher density developments on proposed brownfield site. The Midlands Mayor opposes building on GB, stating there is plenty of brownfield sites. Duty to Cooperate should be used to ensure that developments in Dudley do not occur on Greenfield sites</li> </ul> |  | <p>The sites are not being taken forward for allocation in the Dudley Local Plan</p> |
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|                                     | <ul style="list-style-type: none"> <li>• Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release and Paragraph 175. In addition the data used to calculate the housing need should be reviewed post Brexit and the pandemic.</li> <li>• Other issues raised include developments would leave to overcrowding and need to consider the cumulative impact of other developments in the areas, Increased air and noise pollution as well as flooding, impacts on climate change, new dwellings wont be affordable and the Green Space Assessments which were undertaken were not fairly assessed as assessed small sites against the same criteria as large parks such as Mary Stevens.</li> <li>• In regards to DUH212 (Lewis Road, Lye) there is additional concerns in regards to land contamination issues as the site used to be a refuse site.</li> </ul>  |  |  |
| Policy DSA3 – Land at Ketley Quarry | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Concerns about the impact on the existing road network, including increased congestion, accidents, lack of public transport, no road infrastructure improvements, parking issues. Additional concerns were raised regarding a proposed new road from Lapwood Avenue would cause increase traffic and highway safety issues through the Crestwood Estate and access onto the site from Dalwey Brook.</li> <li>• Existing infrastructure and amenities cannot cope with additional dwellings from the cumulative developments within the area, this includes, health services/ schools/ emergency services</li> <li>• Detrimental impact on the ecology and biodiversity of the site, including the loss of biodiversity and that no biodiversity assessments or wildlife impact assessments had been undertaken and no tree audits have been undertaken to assess valuable trees</li> <li>• Loss of Green space, this included that there is currently not enough open space , objections over the loss of recreational and amenity value of GB/ Greenspace, including the loss of</li> </ul> | <p>Details regarding access and through roads will be dealt with as part of the ongoing planning application</p> <p>Ketley Quarry is a brownfield site and</p> | <p>This site is allocated in the DLP for residential development (DLP KQ H1)</p> |

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|                                     | <p>outlook/views, impact on health and loss of amenity space for walking/exercising (including the loss of the right of way).</p> <ul style="list-style-type: none"> <li>• Brownfield sites should be used first, and there are still other Brownfield sites available including empty properties including council houses, higher density flatted developments. GB is being proposed as its more financially desirable.</li> <li>• Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release and Paragraph 175.</li> <li>• The site includes Ketley Claypit SSSI (a designated geological interest feature) is a site of significant significance and these features should be protected and a geologists should be involved in the process and consult natural England as part of any planning process.</li> <li>• Other issues raised include, increase air pollution, negative impact the development would have on the environment and climate change, increased flooding, the development would change the nature of the area, area is already overcrowded, housing wont be affordable, Governments housing targets are too high and Dudley council shouldn't aim to meet them and the data used to calculate the housing need should be reviewed post Brexit and the pandemic.</li> </ul> | is not designated greenbelt. |   |
| Policy DSA3 – Land at Ketley Quarry | <p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Development of the site would decrease the anti-social behaviour on the Quarry currently and remove an eyesore from the landscape</li> <li>• Support building on a brownfield site</li> </ul>  |                              | This site is allocated in the DLP for residential development (DLP KQ H1) |
| Policy DSA3 – Land at Ketley Quarry | <p><b>Comment</b></p> <ul style="list-style-type: none"> <li>• Support the use of brownfield sites for residential development, however do not support the proposed number of housing on the site and the impact this will have on local infrastructure and amenities, including schools, health services and accessible public open space .</li> </ul>   |                              | This site is allocated in the DLP for residential development (DLP KQ H1) |

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|  | <ul style="list-style-type: none"> <li>Concerns were raised regarding highway safety particularly in regard to potential through road from Lapwood Avenue to the development site.</li> </ul>  |  |  |
| Policy DSA4 – Corbett Meadow Local Green Space | <p><b>Comments</b></p> <ul style="list-style-type: none"> <li>The site has historical significance and potential for high ecological value, however no habitat survey has been undertaken since 1992 and the site should be kept as a nature reserve as has an abundance of wildlife and ecology,</li> <li>The site should not have been selected and should be protected from all development in future and designated as Local Green Space and is an Area of High Historic Landscape Value.</li> <li>Its an important area of Greenspace, which is limited within the wider location which provides health and wellbeing benefits to the community.</li> <li>Other comments raised included, opening the site to the public, potential traffic issues associated with the site being developed for housing and that brownfield land should be used for housing.</li> <li></li> </ul> | <ul style="list-style-type: none"> <li>An updated habitat survey was undertaken in 2023 and the site was upgraded to a SINC</li> <li>Misunderstanding regarding the proposed designation is for Local Green Space Protection and not for housing.</li> </ul> | Site has been allocated for Local Green Space in the Dudley Local Plan |
| Policy DSA4 – Corbett Meadow Local Green Space | <p><b>Support</b></p> <ul style="list-style-type: none"> <li>The designation for the site was supported as would protect a greenfield site from being developed and the site should be preserved as green space due to its important landscape, value to the community (including health and wellbeing benefits), Historical significance and the ecological and wildlife on the site.</li> <li>The site shouldn't be built on as it is donated as a gift to the people and a new development on the site would put pressure on local infrastructure and traffic.</li> <li></li> </ul>   |  | Site has been allocated for Local Green Space in the Dudley Local Plan |

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| <p>BCP Site Ref DUH031 – The Straits, Lower Gornal</p>    | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Concerns about the impact on the existing road network, including increased congestion, accidents, lack of public transport and increase in pollution</li> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services/ schools/ emergency services.</li> <li>• A brownfield first approach should be taken, there are still other Brownfield sites available and Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release.</li> <li>• Detrimental impact on the ecology and biodiversity of the site, including the loss of wildlife and habitats, loss of trees and impact on surrounding nature conservation sites.</li> <li>• Other concerns raised included, issues relating to flooding, the cumulative impact of other developments in the area and the loss of the village feeling of the area, the health benefits of green spaces, the impact on existing residents including the loss of views, there is currently not enough open space available and impact on climate change.</li> </ul> | <p>In regards to GB release whilst the site is a greenfield site it is not designated GB which exceptional circumstances applies to.</p> | <p>This site is allocated in the DLP for residential development (DLP021)</p>           |
| <p>BCP Site REF DUH008 – 116-120 Colley Gate, Cradley</p> | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services/ schools/ emergency services.</li> <li>• Allocation includes prospering businesses and not derelict buildings. Concerns of what will happen to the existing occupied retail units , these should not be lost, due to the importance of the existing commercial units for community.</li> <li>• Concerns about the impact on Road Network</li> </ul>  | <p>The proposed site for housing did not intend to lose the occupied retail units</p>  | <p>The site is not being allocated in the DLP due to being under the site threshold</p> |
| <p>BCP Site REF DUH008 – 116-120 Colley Gate, Cradley</p> | <p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Improve a run down area</li> <li>• Derelict shops redevelopment should be a priority</li> </ul>   |  | <p>The site is not being allocated in the DLP due to being under the site threshold</p> |



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| <p>BCP Site Ref: DUH041 – Land rear of Two Gates Lane, Cradley</p>                | <ul style="list-style-type: none"> <li>• Importance of retaining the car park</li> </ul> <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Detrimental impact on the ecology and biodiversity of the site, including the loss of wildlife and habitats, loss of trees and no ecological assessments undertaken</li> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services/ schools/ emergency services.</li> <li>• Concerns about the impact on the existing road network, including increased congestion and parking issues</li> <li>• A brownfield first approach should be taken, there are still other Brownfield sites available and Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release data used to calculate the housing need should be reviewed post Brexit and the pandemic.</li> <li>• Other concerns raised included, issues relating to the cumulative impact of other developments in the area, the loss of green space and the health benefits of green spaces, the impact on existing residents, impact on climate change and that new dwellings on the site would not be affordable.</li> </ul> |  | <p>This site is allocated in the DLP for residential development (DLPH039)</p> |
| <p>BCP Site Ref: DUH059 – Former New Hawne Colliery, Hayseech Road, Halesowen</p> | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Concerns about the impact on the existing road network, including increased congestion.</li> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services/ schools/ emergency services</li> <li>• A brownfield first approach should be taken, there are still other Brownfield sites available and Allocation of this site is contrary to National Policy (NPPF) as no exceptional circumstances for GB release.</li> <li>• Detrimental impact on the ecology and biodiversity of the site, including the loss of wildlife and habitats and trees.</li> </ul>   | <p>In regards to GB release whilst the site is a greenfield site it is not designated GB which exceptional</p> | <p>This site is allocated in the DLP for residential development (DLPH046)</p> |

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|   | <ul style="list-style-type: none"> <li>• Impact on the heritage, the site includes Grade II and Grade II* Listed buildings which would be affected.</li> <li>• Concerns were also raised in regards to the loss of the area as green space and the impact on the existing residents</li> </ul>  | circumstances applies to.  |  |
| BCP Site Ref DUH045 – Former Factory Site, Park Lane, Cradley | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Existing infrastructure and amenities cannot cope with additional dwellings, this includes, health services and schools</li> <li>• Concerns about the impact on the existing road network, including increased congestion.</li> <li>• Impact on ecology and biodiversity, this includes the loss of wildlife, and impact on the designated SLINCS which should be retained. The NPPF states Local Plans should safeguard ecological sites</li> <li>• Impact on climate change with loss of trees</li> </ul> |  | The site is not being allocated in the DLP due to being under the site threshold |
| BCP Site Ref DUH045 – Former Factory Site, Park Lane, Cradley | <p><b>Comments</b></p> <ul style="list-style-type: none"> <li>• The site must have certain number of affordable units and properties should be affordable for local people</li> <li>• There should be space for a small retail property</li> <li>• The site is an eyesore, and this would improve the area, however we shouldn't wait till 2024 to develop the site</li> <li>• Support the use of brownfield sites</li> </ul>   | <p>Local plan policy will set out the number of affordable units which should be provided on sites.</p> <p>The Local Plan does not set what year a development will take place</p> | The site is not being allocated in the DLP due to being under the site threshold |
| BCP Site Ref DUH205 – National Works, Hall Street, Dudley     | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Concerns about the impact on the existing road network, including increased congestion and parking.</li> <li>• The impact a new development would have on air quality</li> <li>• Cumulative impact from other developments such as the Leisure Centre and the site is too Close to the Town Centre</li> </ul>   |  | This site is allocated in the DLP for residential development (DLPH050)          |

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|   | <ul style="list-style-type: none"> <li>Diverse community in the area, Mosque application was refused on Car Parking, infrastructure, and design issues, how would Hall Street approval address these measures and community tension alleviated</li> </ul>  |  |  |
| BCP Site Ref DUH002 – Land at Old Wharf Road, Stourbridge     | <b>Objections</b> <ul style="list-style-type: none"> <li>Pressure on amenities and infrastructure, including roads, schools, health and sport infrastructure.</li> </ul>   |  | This site is allocated in the DLP for residential development (DLPH002)                              |
| BCP Site Ref DUH004 – Long Lane/ Malt Mill Lane, Shell Corner | <b>Support</b> <ul style="list-style-type: none"> <li>Welcomes the use of Brownfield site</li> </ul>   |  | This site is allocated in the DLP for residential development (DLPH003)                              |
| BCP Site Ref DUH006 – Caledonia Sewage Works, Lye             | <b>Objections</b> <ul style="list-style-type: none"> <li>Impact on ecology and biodiversity, the site is Part SLINC/ SINC and adjoins a SINC, and is part Potential Site of Importance (PSI). The site is adjacent to the River Stour with potential for priority habitats and species and no wildlife assessment have been undertaken</li> <li>The site is located within Area of High Historic Landscape Value</li> </ul>  |  | This site is allocated in the DLP for residential development (DLPH004)                              |
| BCP Site Ref DUH009 – Land off Delph Lane, Brierley Hill      | <b>Objections</b> <ul style="list-style-type: none"> <li>Listed as Brownfield but is a Significant area of Semi-natural habitat, therefore queries the designation as brownfield site as only a small area of ‘brownness’ most of the site is ‘green’, which should be left</li> <li>Impact on ecology and biodiversity, the site is currently home to lots of wildlife, and no wildlife assessment has been undertaken. Space should be left for the foxes but the site does have potential for ongoing ecological recovery restoration. There are also a number of mature trees on the site includes TPO’s around the perimeter</li> <li>The site should remain as a pedestrian ‘cut-through’ and a wildlife corridor</li> <li>Concerns regarding highway safety, this includes pedestrian safety due to no pavements and accidents around Amblecote road</li> </ul> | The site was reassessed and noted that it is a Greenfield site | This site is not being allocated in the DLP due to the restricted access and Loss of protected trees |

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|   | <ul style="list-style-type: none"> <li>• Delph Lane should be considered a Historic Landscape and any housing needs to be designed with consideration to the character of Withymoor Village (e.g. not 3 storey town houses)</li> <li>• Highway Safety</li> <li>• Delph Lane would be better considered a Historic landscape,</li> </ul>   |  |  |
| BCP Site Ref DUH010 – Land Off Ruiton Stret/ Colwall Road, Lower Gornal | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• The site is a significant area of Semi-natural habitat and is more beneficial left as greenfield than residential as the space is valuable to the community and there is a lack of alternative of Greenspace in Dudley. There are other more suitable sites which could be used.</li> <li>• Impact on the Wildlife</li> </ul>   |  | This site is allocated in the DLP for residential development (DLP006)           |
| BCP Site Ref DUH011 – Bourne Street, Coseley                            | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• The site is a designated SLINC and development would impact the wildlife on the site.</li> <li>• The site is not Brownfield or Greenfield it's a landfill site which is not safe for development due to containing mine shafts and toxic waste. There are concerns about the impact on residents health (Gas explosions, other examples of developments on Tips)</li> </ul> |  | This site is allocated in the DLP for residential development (DLP007)           |
| All sites within Coseley  | <p><b>Objection</b></p> <ul style="list-style-type: none"> <li>• Infrastructure cant cope with current level of development</li> <li>• Proposals will result in the loss of green spaces in the area</li> <li>• Roads are already congested.</li> </ul>   |  |  |
| BCP Site Ref DUH012 – Summit Place, Gornal Wood                         | <p><b>Objections</b></p> <ul style="list-style-type: none"> <li>• Potential Highway safety issues relating to increased traffic.</li> <li>• Development would put a strain on infrastructure including schools and health services.</li> <li>• Don't need as much retail space developments should be alternatively located in the Town Centres.</li> </ul>   |  | The site is not being allocated in the DLP due to being under the site threshold |

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| BCP Site Ref DUH015 – Land at Plant Street, Mill Street and Bridge Street, Wordsley | <b>Objections</b> <ul style="list-style-type: none"> <li>The site adjoins the canal conservation area with some historic buildings and is part of the regions industrial heritage.</li> </ul>  |  | This site is allocated in the DLP for residential development (DLPH010)                                |
| BCP Site Ref DUH019 – Rufford Road  | <b>Objection</b> <ul style="list-style-type: none"> <li>Current business does not intend to develop the site</li> </ul>  | The objectors site is not within the Housing allocation and is intended to be retained as employment | This site is not within the proposed housing allocation (DLPH014)                                      |
| BCP Site Ref DUH020 – Lyde Green/ Cradley Road, Cradley                             | <b>Objections</b> <ul style="list-style-type: none"> <li>The site is adjacent to the River Stour and acts as a wildlife corridor with riverside access. There is potential for investment in ecological recovery (Key river corridor and river bank habitat)</li> </ul>  |  | This site is allocated in the DLP for residential development (DLPH015)                                |
| BCP Site Ref DUH022 – Land off Thorns Road, Lye (North)                             | <b>Objections</b> <ul style="list-style-type: none"> <li>The site is adjacent to Mears Coppice which is an ancient semi-natural woodland which is a protected habitat and vulnerable to damage from inappropriate adjacent land uses.</li> <li>This site is a buffer between residential areas and the protected woodland and there is opportunities for ongoing ecological recovery and restoration.</li> </ul> |  | This site is allocated in the DLP for residential development (DLPH017)                                |
| BCP Site Ref DUH023 – Land off Engine Lane  | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of development on a brownfield site subject to well designed schemes which includes greenspace</li> </ul>  |  | This site is not being allocated in the DLP for residential development following landowner engagement |
| BCP Site Ref DUH024 – East of Engine Lane   | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of development on a brownfield site subject to well designed schemes which includes greenspace</li> </ul>  |  | This site is not being allocated in the DLP for residential development following landowner engagement |

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| BCP Site Ref DUH025 – Bott Lane/<br>Dudley Road                   | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of development on a brownfield site subject to well designed schemes which includes greenspace</li> </ul>  |  | This site is not being allocated in the DLP for residential development following landowner engagement   |
| BCP Site Ref DUH033 – Former<br>Hospital Site, Ridge Hill         | <b>Objections</b> <ul style="list-style-type: none"> <li>The site is noted as brownfield, but is greenspace adjacent to an area of mature tree cover.</li> <li>No ecological or habitat surveys were undertaken and there is potential for ecological recovery and restoration.</li> </ul> |  | This site is allocated in the DLP for residential development (DLP022)                                   |
| BCP Site Ref DUH035 – Hayes Lane,<br>Stour Valley Road            | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of a Brownfield site</li> </ul>  |  | This site is allocated in the DLP for residential development (DLP024)                                   |
| BCP Site Ref DUH035 – Hayes Lane,<br>Stour Valley Road            | <b>Objections</b> <ul style="list-style-type: none"> <li>The site is a heritage asset and includes an Area of High Historic Townscape Value</li> </ul>   |  | This site is allocated in the DLP for residential development (DLP024)                                   |
| BCP Site Ref DUH036 – Leona<br>Industrial Estate                  | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of a Brownfield site</li> </ul>  |  | This site is not being allocated in the DLP for residential development due to continued employment use. |
| BCP Site Ref DUH038 – Land<br>Between Heath Road and Cope<br>Road | <b>Objections</b> <ul style="list-style-type: none"> <li>The site has been incorrectly designated as brownfield when it is public amenity greenspace.</li> </ul>   | In the DLP it is now noted as currently a Greenfield site  | This site is allocated in the DLP for residential development (DLP037)                                   |
| BCP Site Ref DUH043 – Woodman<br>Inn                              | <b>Objections</b> <ul style="list-style-type: none"> <li>To the use of greenfield site allocated for residential development due to the importance of green space to residents including recreational value, health benefits and impact on the environment and climate change</li> </ul>   | This site is not a greenfield site as it is previously developed land and therefore a brownfield site. | Site is not allocated in the DLP due to being under the site threshold                                   |
| BCP Site Ref DUH046 – Former MEB<br>Headquarters                  | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of a Brownfield Site</li> </ul>  |  | This site is allocated in the DLP for residential development (DLP028)                                   |

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| BCP Site Ref DUH049 – Former Mons Hill Campus               | <b>Objections</b> <ul style="list-style-type: none"> <li>The site adjoins a SLINC, the site provides an opportunity to create a buffer of appropriate habitat as defined Draft Black Country Local Nature Recovery Strategy, as part of the provision o high-quality accessible natural greenspace.</li> </ul>  |   | The site is not allocated in the DLP or residential development due to proposed alternative use |
| BCP Site Ref DUH052 – Land rear of 294-364 Stourbridge Road | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of a Brownfield Site.</li> </ul>  |   | This site is allocated in the DLP for residential development (DLPH042)                         |
| BCP Site Ref DUH052 – Land rear of 294-364 Stourbridge Road | <b>Objections</b> <ul style="list-style-type: none"> <li>The site is currently grazing land and the access to the site is unsuitable for residential development and alternative access would not be viable.</li> <li>The site forms part of a green/wildlife corridor between Hawne Park and Lutley Gutter. The designation should be amended from residential to local Greenspace</li> </ul>  | This site was not submitted for assessment as Local Green Space for designation.    | This site is allocated in the DLP for residential development (DLPH052)                         |
| BCP Site Ref DUH060 – Foredraft Street                      | <b>Objections</b> <ul style="list-style-type: none"> <li>The site is not suitable for housing due to the lack of parking for new dwellings, and concerns regarding highway safety with Foredraft street being closed to traffic, and current level of traffic restricts access for emergency vehicles</li> <li>Proposals for developments on this site have already been rejected have the previously raised issues of parking, pollution, traffic, loss of greenspace and natural habitat, impact on residents (e.g. loss of natural light) and impact on business been resolved</li> <li>Concerns regarding the impact on existing infrastructure such as schools and health services.</li> </ul> | Any new housing development would be required to meet the adopted parking standards | This site is allocated in the DLP for residential development (DLPH029)                         |
| BCP Site Ref DUH066 – Sandvik Ltd., Manor Way               | <b>Support</b> <ul style="list-style-type: none"> <li>Support the use of a Brownfield Site</li> </ul>   |   | This site is allocated in the DLP for residential development (DLPH048)                         |
| BCP Site Ref DUGT01 – Delph Lane                            | <b>Objection</b> <ul style="list-style-type: none"> <li>The access to the site is not suitable due to it being a narrow land with poor visibility</li> </ul>  |   | This site is allocated in the DLP (GT05)  |

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| Unallocated: Halesowen Green Belt           | <p><b>Support/ Comment</b></p> <ul style="list-style-type: none"> <li>• Support the retention of the GB designation for the Halesowen countryside due to: <ul style="list-style-type: none"> <li>○ Its historical importance/ heritage of the area which is important to the character and identity of the area. This includes the siting of Scheduled Ancient Monuments, Listed Buildings and Conservation Areas</li> <li>○ The physical and mental health benefits for residents having access to the GB Land</li> <li>○ Protecting the sites/ areas for future generations</li> <li>○ The area is an important amenity asset for residents, providing areas for recreation, including walking.</li> </ul> </li> </ul> | These site are remaining unallocated in the DLP  | These site are remaining unallocated in the DLP |
| Unallocated: Flint Fields Local Green Space | <p><b>Comment/ Object</b></p> <ul style="list-style-type: none"> <li>• Support the application for Flint Field to be designated as Local Green Space (LGS) due to the sites significance. Site is different in size and character to the surrounding Green Belt. The site is used for walking with views across the Black Country</li> </ul>   | The site is designated as Green Belt, the LGS designation provides sites with the same protection as Green Belt, therefore the LGS designation would not have given the site any additional protection than it currently has as Green Belt | The site is remaining unallocated in the DLP    |
| Unallocated: Three Fields Local Green Space | <p><b>Comment/ Object</b></p> <ul style="list-style-type: none"> <li>• Object to the site not being designated as Local Green Space (LGS). The site meets the part a criteria for the LGS assessment and the site is used by the community demonstrating recreational value as the site is used by walkers and cyclists. The site forms part of a wider green corridor. As well as the site having beauty significant due to</li> </ul>  | The site is designated as Green Belt, the LGS designation provides sites with the same protection as Green Belt, therefore the LGS designation   | The site is remaining unallocated in the DLP    |



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|                                   | <p>the views and contributes to the local identity and character of the area.</p> <ul style="list-style-type: none"> <li>• A LGS designation would demonstrate the importance of the community value of the land which the Green Belt designation does not do</li> <li>• The Green Belt designation is not enough to protect the site from development</li> </ul>  | would not have given the site any additional protection than it currently has as Green Belt    |  |
| Unallocated: Bromwich Lane Field  | <p><b>Objection</b></p> <ul style="list-style-type: none"> <li>• The site is not being proposed for allocation but wants to raise objections to why it should not be developed regarding: <ul style="list-style-type: none"> <li>○ Protection of Green Belt land</li> <li>○ Protection of the land for public enjoyment and amenity</li> <li>○ Drainage and flood risk</li> <li>○ Pressure on amenities and infrastructure (doctors, dentists and schools).</li> </ul> </li> </ul> | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
| Unallocated: Land at Junction 3   | <p><b>Objection</b></p> <ul style="list-style-type: none"> <li>• Objecting to the inclusion of this site which has previously been campaigned against on many grounds, including it being a greenfield site and congestion</li> </ul>  | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
| Unallocated: North of Himley Road | <p><b>Objection</b></p> <ul style="list-style-type: none"> <li>• The site is Green Belt land and proposed development on the site would have a detrimental impact on the existing residents due to: <ul style="list-style-type: none"> <li>○ Increased traffic</li> <li>○ Pressure on amenities and infrastructure</li> <li>○ Impact on ecology and nature conservation</li> </ul> </li> <li>• Brownfield sites should be found and used for regeneration</li> </ul>               | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
| Unallocated: Racecourse Lane      | <p><b>Objection</b></p>  | The site was assessed as   | The site is remaining unallocated in the DLP |

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|                                      | <ul style="list-style-type: none"> <li>• The site is the main underground storage facilities used by Severn Trent</li> <li>• There is enough Brownfield sites to meet future requirements</li> <li>• Need to retain sporting facilities</li> <li>• Development would put a strain on existing amenities and infrastructure</li> </ul> | unsuitable for a housing allocation and was not allocated in the Plan                          |  |
| Unallocated: Clockfields Open Space  | <b>Objection</b> <ul style="list-style-type: none"> <li>• This green space should be protected from development.</li> </ul>   | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
| Unallocated: Stourbridge Golf Course | <b>Objection</b> <ul style="list-style-type: none"> <li>• Site should not be developed due to the types of habitats on the site</li> <li>• The impact on the health and wellbeing of residents who use the site for recreation</li> </ul>   | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
| Unallocated: Land off Lutley Lane    | <b>Objection</b> <ul style="list-style-type: none"> <li>• Oppose development on this site due to the amenity value of the land for residents</li> <li>• Access to the site would not be suitable for larger vehicles</li> </ul>   | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
| Unallocated: Russels Hall Area       | <b>Objection</b> <ul style="list-style-type: none"> <li>• Impact on ecology and residents, and already development in the area</li> </ul>   | The site was assessed as unsuitable for a housing allocation and was not allocated in the Plan | The site is remaining unallocated in the DLP |
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| Other                                | <b>Objection</b>  |  |  |

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|  | <p>A number of additional objections were received which were not regarding a specific site, these include:</p> <ul style="list-style-type: none"><li>• Residents had not been consulted about removing the Green Belt designations and Dudley Council did not notify residents. Green Belt should not be developed and Brownfield use should be used first.</li><li>• Dudley should put its residents needs first as Stourbridge has few connections to the other areas of the Black Country.</li><li>• Plan should make provision for a new sports facility to house local sports teams, in particular Cradley Heathens Speedway Team</li><li>• Plan does not meet the housing need</li><li>• Dudley Borough should not be expected to hit the housing target due to being largely built on.</li></ul> |  |  |
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