### WEBSITE VERSION

<table>
<thead>
<tr>
<th>Respondent Name</th>
<th>Site being referred to by respondent (if applicable)</th>
<th>Site(s) and Monuments Record reference number (if applicable)</th>
<th>Summary of Representation</th>
<th>Council Response</th>
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<tbody>
<tr>
<td>Bethel Chapel</td>
<td>Bethel Chapel</td>
<td>4613</td>
<td>Supporting Comments states: You’ve read the proposed criteria we feel they appear to be a fair method of assessment. Goes on to set out how the Bethel Chapel building satisfies the proposed assessment criteria and should thus remain locally listed.</td>
<td>The Bethel Chapel’s support is welcomed and will be taken into consideration in preparing a final version of the local listing assessment criteria. Re-assessing Dudley’s locally listed buildings and structures will take place at a later stage.</td>
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<td>Hill Street</td>
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<td>Brerley Hill</td>
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**Brerley Hill Civic Society (Tim Sunter - Chair)**

- Commented on the proposed criteria in relation to Brerley Hill: giving general support to the proposed criteria but with a number of suggested wording changes, additions and deletions. 1/ Recommends changing ‘Architectural Merit’ to ‘Architectural Interest’. 2/ The Society expressed concern as to the need additionally to criteria to remove entries from the Local List where they are within a designated Conservation Area. 3/ The Society sought deletion of the ‘Art Additionally’ criteria as to: The value of buildings should be considered within the context of wider regeneration opportunities and the benefits or otherwise heritage assets can bring. 4/ No Architectural Merit second criterion states. We think it would be preferable not to restrict the qualitative characteristics only to reflect similar local characteristics. 5/ Recommends the ‘Art Additionally’ heading be replaced with ‘Additional Criteria’ and puts forward a quantity of further suggested criteria as to: Age, Aesthetic value, c/ Physical integrity, d/ Rarity, e/ Social significance and group value, f/ Local identity, 6/ Additionally suggests that references to buildings and structures ‘be expanded to include ‘designed landscapes’ such as memorial parks. 7/ Seeks the inclusion of a photo and description of each entry in the revised Local List, and that this revised List be made available online and at libraries.

- Brerley Hill Civic Society’s support and further comments/suggestions are welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria. Re-assessing Dudley’s locally listed buildings and structures will take place at a later stage.

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1/ We will amend the ‘Architectural Merit’ heading to read ‘Architectural Interest’ and note that Historic England and Ms Joan Kendrick recommends this too - see their representations below.

2/ We remain of the view that buildings and structures are better protected by Conservation Area status/policies, and thus need not additionally remain locally listed. We will give thought to the idea of producing a publicly available list of those buildings etc removed from the Local List due to their Conservation Area status/protection - possibly as an annex/appendix to the Local list itself (as the BH Civic Society suggests).

3/ We consider that the historic environment has an important role to play in regeneration terms, and therefore that the ‘regeneration opportunities’ assessment criterion should remain but with the phrase ‘or otherwise’ deleted since appears too negative - the criterion (now 16) will thus be amended to read: The value of buildings should be considered within the context of wider regeneration opportunities and the benefits heritage assets could bring.

4/ Agree - we will amend criterion 3 to read: Has it important qualities of age, style, materials, plan or other distinctive characteristics significant to the local area? We will also make further changes to the assessment criteria as to reflecting other historic buildings in the area - notably an additional criterion under ‘Architectural Merit’ (new Architectural Interest) to ‘group value’ as called for by Historic England (see its representation below) stating: Does it have group value – is it part of a group of assets with a clear visual, design, architectural or historic relationship?

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5/ Agree - we will amend criterion 5 to read: Does it have physical integrity – is it largely complete or in a near to original condition? Careful consideration will be given to the merits or otherwise of buildings or structures which have been extensively altered, extended and or modernised.

6/ ‘Rarity’ is specifically mentioned at criterion 3 in terms of construction and materials. However informed by the Society’s representation and that from Historic England (the latter stating to consider a range of criteria set out at page 16 Table 1 of its then English Heritage May 2012 ‘Good Practice Guide for Local Heritage Listing’) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?

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5a/ Agree - ‘Age’ is included in our intended amendment to criterion 3 set out above.

5b/ Although aesthetic value is partly covered in amended criterion 2 (see above) and also proposed amended criterion 6 (see point 6 of Ms Joan Kendrick’s representation below), informed by the Society’s representation and that from Historic England (the latter stating to consider a range of criteria set out at page 16 Table 1 of its then English Heritage May 2012 ‘Good Practice Guide for Local Heritage Listing’) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?

5c/ Agree - proposed criterion 11 with a criterion under ‘Additional Criteria’ stating: Does it have physical integrity – is it largely complete or in a near to original condition? Careful consideration will be given to the merits or otherwise of buildings or structures which have been extensively altered, extended and or modernised.

5d/ ‘Social significance’ is partly catered for at criterion 5 and additionally 6 - However informed also by Historic England’s representation (see below) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?

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6/ ‘Social significance’ is partly catered for at criterion 5 and additionally 6 - However informed also by Historic England’s representation (see below) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?

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6a/ ‘Group value’ is partly catered for at criterion 5 and additionally 6 - However informed also by Historic England’s representation (see below) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?

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6b/ ‘Group value’ is partly catered for at criterion 5 and additionally 6 - However informed also by Historic England’s representation (see below) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?

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6c/ ‘Group value’ is partly catered for at criterion 5 and additionally 6 - However informed also by Historic England’s representation (see below) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?
Supporting Comments state that Appendix 1 to the consultation letter (i.e. the proposed assessment criteria) ‘seems very comprehensive’. States the need for an additional criterion to protect locally listed buildings from ‘unsympathetic surrounding development’ if they are to be retained as a visual and historic amenity. States that his property should remain on the Local List.

Roger Staphnill

1/ Supports the criteria should be updated to expand on the simplicity of the original 1996 ones.
2/ Considers the new proposed criteria to be similarly subjective in their application and thus that Dudley heritage asset property owners be involved in the process.
3/ States that Dudley Council should clarify the insurance ambiguity that arises because most insurance companies don’t show the difference between local listing and National Listing - the latter having insurance cost repercussions. Further states that Dudley Council should issue a statement to owners of locally listed buildings (for them to produce to their insurance companies) in this regard.

1/ Mr Staphnill’s support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria.

Alun Payne

Supporting comments on the proposed updated set of assessment criteria states: it seems to me to be very comprehensive in its coverage criteria. Far more so than in 1996 and therefore more searching in spec.

1/ Supports that the criteria should be updated to expand on the simplicity of the original 1996 ones.
2/ Considers the proposed updated set of assessment criteria to be subjective in their application - they are purposely more detailed than the original 1996 criteria in order to better define and identify what should be a locally listed building or structure and to better justify and defend them from inappropriate development proposals.

3/ We will add suitable text to Dudley Council’s Locally Listed Buildings webpage in order to set out that local listing is distinct from and differs to listing buildings/structures under statute (and will add similar wording to Dudley Council responses to Search enquiries in those instances where a locally listed building/structure is involved). Please note that buildings/structures that are locally listed by Dudley Council should not be confused with those that are statutorily listed by the UK Government’s Secretary of State – the latter being afforded a higher level of policy protection and significantly requiring listed building consent from Dudley Council where such as demolition, alteration, extension or change of use is being proposed. That said, development proposals likely to affect locally listed buildings/structures in Dudley Borough must satisfy the various policy requirements set out in Dudley Council’s Local Plan and the UK Government’s March 2012 National Planning Policy Framework (NPPF – specifically Chapter 12 ‘Conserving and enhancing the historic environment’).

Ralph Homer

5f/ Agree – informed also by Historic England’s representation (see below) we will add an additional assessment criterion under ‘Additional Criteria’ as to Dudley’s identity – stating: ‘Does the building contribute towards Dudley’s identity – is it important to the identity or character of the borough or a particular part of it? Does it have aesthetic, evidential, social or communal value?’

2/ Designed landscapes (such as memorial parks) are identified in Dudley’s Historic Environment Record (HER) and are separately safeguarded under differing Dudley Local Plan Policy to that for locally listed buildings/structures – inclusion of ‘designed landscapes’ within the Dudley Local List assessment criteria is therefore not necessary.

3/ ‘The inclusion of a photo and description for each entry in the revised local list would result in a large unreadable document – this information is available on Dudley’s Historic Environment Record available via the Heritage Gateway (see http://www.dudley.gov.uk/resident/planning/historic-environment/). The revised Local List will be made available online and (likely) at main Dudley Borough Libraries.

Ralph Homer 54 Cot Lane Wordsley 7081
(Cot Farm / The Old Cot.)

Roger Staphnill

1/ Considers the the original 1996 assessment criteria to be simpler to understand and more flexible. 2/ Considers that a building be retained on the list under proposed criterion 11 if the building’s alteration ‘demonstrate key changes in the area’s historical and industrial development’. 3/ Would like to see ‘Industrial’ included under criterion 5 (relating Dudley and Stourbridge’s ‘Industrial significance’), 4/ Considers the ‘Architectural Merit’ criteria to be quite specific and to potentially not cover for buildings that are ‘just generally typical of their time, buildings that together are good surviving examples of an historic architectural style’. 5/ Questions use of the heading ‘Architectural Merit’. 6/ Questions the meaning/definition of criterion 4 ‘landmark quality’ and suggests that buildings/structures of ‘landmark quality’ would be statutorily listed and thus need not be locally listed. States the assessment criteria do not give mention to townscapes appearance or to buildings that are a focal point of social or visual interest. 7/ States: the term ‘structures’ is used in (and Additional) but there is no real reference throughout to street furniture or other structures that might be on a local list! (gives examples). 8/ Supports Dudley MBC’s efforts in safeguarding the Borough’s local heritage.

2/ We agree it is important that an altered building should potentially be retained on the local list if it reflects key changes in the area’s historical and industrial development’, and consider this to partly be answered for under criterion 5 [displaying an important aspect of the area’s social, economic or cultural history]. However and informed also by Brierley Hill Civic Society and Historic England representations, we will replace current proposed criterion 11 with a new assessment criterion under ‘Additional Criteria’ stating: ‘Does it have physical integrity - is it largely complete or in a near to original condition? Careful consideration will be given to the merits or otherwise of buildings or structures which have been extensively altered, extended and/or modernised.’

3/ We agree that the industrial significance of an area should be recognised under criterion 5, but consider that this is already covered by this criterion’s reference to ‘economic’ activity, and that the additional proposed criterion under the ‘Additional Criteria’ heading as to ‘Dudley’s identity’ adds further to this (Brierley Hill Civic Society and Historic England representations refer).

Mr Payne’s support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria.
The suite of criteria under the 'Architectural Merit' heading are purposely detailed in order to best identify and safeguard locally-listed buildings and structures - and we are amending/add to them in response to the various consultation representations received. Buildings typical of their time or when taken together are good surviving examples of an historic architectural style are covered by such as criteria 2, 5 and 9 - and are further covered under the additional proposed criteria under the 'Additional Criteria' heading as to 'Dudley's identity'.

We will amend the 'Architectural Merit' heading to read: Architectural Interest (and noting that Historic England recommends this too)

It cannot be assumed that all buildings/structures of landmark quality are statutorily listed, and 'landmark status' is identified as a commonly applied local listing criterion at page 16 Table 1 of Historic England's May 2012 'Good Practice Guide for Local Heritage Lists'. A building/structure's contribution towards local townscape can be recognised under various of the criteria including 2, 4, 5 and 9. Townscape is considered under Black Country Strategy Policy EN2 (Historic Character and Local Distinctiveness) and is specifically addressed in our emerging Dudley Borough Development Strategy (January 2016 Publication) under proposed Policy 512 'Areas of High Historic Townscape Value (APHTV)'. Buildings as focal points of social or visual interest essentially 'have landmark status' as described in the May 2012 Historic England guidance (Table 2) - further justifying assessment criterion 4. In order to better define criterion 4 and reflecting the Historic England guidance, we will amend it to read: Does it have landmark quality in terms of striking aesthetic value or a strong communal or historical association?

We will amend the list of assessment criteria to generally be couched in terms of 'buildings and structures' (rather than simply 'buildings')

The support of the owner/occupier of 7 Hill Street, Upper Gornal is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria.

In order to better define criterion 4 and reflecting the Historic England guidance, we will amend it to read:

'Does it have landmark quality in terms of striking aesthetic value or a strong communal or historical association?'

We will amend the 'Architectural Merit' heading to read: Architectural Interest

We have amended various of our proposed assessment criteria and added new ones where necessary. In particular, we have added new criteria as to group value (under 'Architectural Merit'), rarity (under 'Historical Interest') and communal value (under 'Architectural Merit').

We have very few comments as consider that the selection criteria is very detailed, with only minor omissions at this stage; 1/ Consider amending 'Architectural Merit' to 'Architectural Interest'; 2/ Historic England recommended we make use of its then English Heritage May 2012 'Good Practice Guide for Local Heritage Lists' - in particular the variously applied selection criteria set out at page 16 Table 1 of this guidance; 3/ Historic England states that the following assessment criteria could suitably be included: 3a/ 'Group value' is to some extent implicit under criterions 2 and 9. However, we agree that 'group value' should feature more prominently and will include a new criterion under 'Architectural Merit' to read: 'Does it have group value - is it part of a group of assets with a clear visual, design, architectural or historic relationship?'

We have amended various of our proposed assessment criteria and added new ones where necessary. In particular, we have added new criteria as to group value (under 'Architectural Merit'), rarity (under 'Historical Interest') and communal value (under 'Architectural Merit').

3b/ Known archaeological assets are identified in Dudley's Historic Environment Record (HER) and are separately safeguarded under differing Dudley Local Plan Policy to that for locally listed buildings/structures - a Dudley Local List criterion for archaeology is therefore not necessary.

3c/ We have amended various of our proposed assessment criteria and added new ones where necessary. In particular, we have added new criteria as to group value (under 'Architectural Merit'), rarity (under 'Historical Interest') and communal value (under 'Architectural Merit'). 3d/ 'Communal value' is to an extent covered by criterions 5 and 8. However, we agree that communal value should be better addressed and will thus be included under 'Additional Criteria' within a new criterion 11 'could be re-focussed to look at integrity and what remains rather than what is lost'.

3e/ We will amend the 'Architectural Merit' heading to read: Architectural Interest

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3c/ 'Communal value' is to an extent covered by criterions 5 and 8. However, we agree that communal value should be better addressed and will thus be included under 'Additional Criteria' within a new criterion 11 'could be re-focussed to look at integrity and what remains rather than what is lost'.

4/ Agree that criterion 11 should be re-focussed towards integrity and that which remains rather than what is lost - we will delete criterion 11 and replace it with a new one under 'Additional Criteria' to read: Does it have physical integrity - it is largely complete or in a near to original condition? Careful consideration will be given to the merits or otherwise of buildings or structures which have been extensively altered, extended and or modernised.

6/ It cannot be assumed that all buildings/structures of landmark quality are statutorily listed, and 'landmark status' is identified as a commonly applied local listing criterion at page 16 Table 1 of Historic England's May 2012 'Good Practice Guide for Local Heritage Lists'. A building/structure's contribution towards local townscape can be recognised under various of the criteria including 2, 4, 5 and 9. Townscape is considered under Black Country Strategy Policy EN2 (Historic Character and Local Distinctiveness) and is specifically addressed in our emerging Dudley Borough Development Strategy (January 2016 Publication) under proposed Policy 512 'Areas of High Historic Townscape Value (APHTV)'. Buildings as focal points of social or visual interest essentially 'have landmark status' as described in the May 2012 Historic England guidance (Table 2) - further justifying assessment criterion 4. In order to better define criterion 4 and reflecting the Historic England guidance, we will amend it to read: Does it have landmark quality in terms of striking aesthetic value or a strong communal or historical association?

We will amend the list of assessment criteria to generally be couched in terms of 'buildings and structures' (rather than simply 'buildings')

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Ian and Marion Kemp's support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria.

M and R Wilkinson provide information on 111 High Street, Amblecote as to its historic value in local listing terms.

M and R Wilkinson's support for Dudley Borough's historic environment is welcomed.

Ron Williams provides information as to his property's historic value and why it should be (or remain) on the local list.

Mr Williams' support for Dudley Borough's historic environment is welcomed.

Historic England's support is welcomed.
Mike Westwood  Ivyhouse Cottage  7514
63 Ivy House Lane  Coseley
Mr Westwood's support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria. Re-assessing Dudley's locally listed buildings and structures will take place at a later stage.

B and LP Harris  St. George's Cottage, 112 Sandyfields Road, Sedgley
B and LP Harris' support for Dudley Borough's historic environment is welcomed. Re-assessing Dudley's locally listed buildings and structures will take place at a later stage.

Lye and Wollescote Historic Society (Colin Woolridge - Archivist)
Did not make comment on the proposed assessment criteria, or on the Local List more generally - was recommending a collection of (historic?) bricks in his possession for possible re-use at a public site for the benefit of the local community.

The Fatherhood Institute (Jeszemma Garratt - Head of Training and Development)
Supports - states: We believe the new assessment criteria (at Appendix 2 to your letter dated 13 May 15) is a far more appropriate way of assessing whether a structure should appear on the local listing. We would therefore approve of your suggested changes as shown at Appendix 1.

The Mary Stevens Hospice (Gerry Crowe - Business Development Officer)
Supports - states: All looks good to me. Maybe criteria which looks at the building adding to the attractiveness of the area would be good. Suggests the Locally Listed Buildings webpage could be improved by: Adding more detail on the site as to why the building is locally listed and what the listing means for Dudley and for the owners of the building. That information would be useful when selling and buying listed property.

The Tipton Civic Society (Keith Hodgkins - Chairman)
The Tipton Civic Society's support for Dudley Borough's historic environment is welcomed. Re-assessing Dudley's locally listed buildings and structures will take place at a later stage. Have noted the Society's 2 proposed new additions to the List for future consideration.

Cora Turner-Collis  108 & 110 Sandyfields Road, Sedgley
The Society's support for Dudley Borough's historic environment is welcomed.

B and LP Harris provide information as to their property's historic value and why it should remain on the Local List.

The Fatherhood Institute's support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria. The revised Local List will be made available online and (likely) at main Dudley Borough libraries.

The Mary Stevens Hospice's support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria.

Cora Turner-Collis made no comment on the proposed assessment criteria - instead setting forward 2 buildings for Dudley Council to consider for local listing.

Mr Hodgkins made no comment on the proposed assessment criteria - instead setting forward 2 buildings for Dudley Council to consider for local listing.

E-mail responded to Ms Turner-Collis (16 Jun 2015) - setting out the purpose of the consultation and that it is as to local rather than statutory listing, and that assessing buildings for their retention, removal or addition to the Local List will take place at a later stage.

The Mary Stevens Hospice (Gerry Crowe - Business Development Officer)

Supports - states: All looks good to me. Maybe criteria which looks at the building adding to the attractiveness of the area would be good. Suggests the Locally Listed Buildings webpage could be improved by: Adding more detail on the site as to why the building is locally listed and what the listing means for Dudley and for the owners of the building. That information would be useful when selling and buying listed property.

The Fatherhood Institute's support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria. The revised Local List will be made available online and (likely) at main Dudley Borough libraries.

The Tipton Civic Society's support for Dudley Borough's historic environment is welcomed. Re-assessing Dudley's locally listed buildings and structures will take place at a later stage. Have noted the Society's 2 proposed new additions to the List for future consideration.

Tipton Civic Society
Keith Hodgkins - Chairman

Mr Hodgkins made no comment on the proposed assessment criteria - instead setting forward 2 buildings for Dudley Council to consider for local listing.

The Tipton Civic Society's support for Dudley Borough's historic environment is welcomed. Re-assessing Dudley's locally listed buildings and structures will take place at a later stage. Have noted the Society's 2 proposed new additions to the List for future consideration.

The Mary Stevens Hospice's support is welcomed and will be taken into consideration in preparing a final version set of local listing assessment criteria. The revised Local List will be made available online and (likely) at main Dudley Borough libraries.

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