

**From:** [REDACTED]  
**To:** [Karen Richards](#)  
**Subject:** Updated submission  
**Date:** 07 December 2022 09:37:06  
**Attachments:** [REDACTED]

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Hi Karen,

**Re Support for Policy AS5 in its current format**

Can you please replace my consultation submission with the attached updated version. Apologies for any inconvenience. Can you please let me know this arrived.

Many thanks,  
Martin

Martin Hollinshead  
Dunsley Drive Resident's Committee

[REDACTED]  
[REDACTED]  
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Email: [REDACTED]

### **Support for Policy AS5 in its current format**

Dunsley Drive Resident's Committee would like to express support for Policy AS5 in its current format, this now **not including** the rejected Site 272 at Dunsley Drive.

In rejecting Site 272 for residential housing, South Staffordshire Council has clearly taken on board public comments and re-examined this former Preferred Option, concluding that it does not perform nearly as well as the initial assessment indicated. This revised assessment supports an independent evaluation by AJM Planning Associates, commissioned by Dunsley area residents for the Preferred Options consultation.

Key points against Site 272, as highlighted by Dunsley Drive residents, were:

- It is elevated and highly visible
- Is in an area of particularly sensitive Green Belt
- There would be no 'defensible' boundary
- There would be significant damage to the Historic Environment and Conservation Area
- Vehicular access is not possible given the current site boundary
- A hazardous road crossing for pedestrians

Martin Hollinshead, 7 December 2022.

Appendix 1: Response by Residents from the Dunsley area of Kinver in consideration of Preferred Option 272 Land East of Dunsley Drive proposed by South Staffs District Council

# **APPENDIX 1**

**RESPONSE BY RESIDENTS**  
**FROM THE DUNSLEY AREA OF KINVER**  
**IN CONSIDERATION OF**  
**PREFERRED OPTION 272 LAND EAST OF DUNSLEY DRIVE**  
**PROPOSED BY SOUTH STAFFS DISTRICT COUNCIL**

**SUBMITTED TO SOUTH STAFFS DISTRICT COUNCIL BY:**

1. Mr M & Mrs T Hollinshead,
2. Mr L & Mrs H Smith,
3. Mr B & Mrs S Loverock,
4. Mr M & Ms L Bache,
5. Mr B & Mrs S Capon,
6. Mr A Jones,
7. Mr G & Mrs L Docherty,
8. Mr M D Macefield,
9. Miss D Bird & Mr B Biddle,
10. Mr M & Mrs A Waites,
11. Mr T C Wood, Lonicera,
12. Mr D & Mrs J Emery,
13. Mr P & Mrs M Stokes,
14. Mr G & Mrs L Taylor,
15. Mr A & Mrs V Windridge,
16. Mr M & Mrs J Lindon-Jones,
17. Mr T Mathers,
18. Mr S & Mrs K Denison,
19. Mr J Clarke,
20. Mr P London,
21. Mr S & Mrs C Russell-Lacy,
22. Mr A & Mrs J Clifton-Coles,
23. Mr A Bradley,
24. Dr J Thompson,
25. The Occupier,
26. Mr N & Mrs J Kelford,
27. Mr A Walker,
28. Mr. J & Mrs M Rhead,
29. Mr S & Mrs C Groucutt,
30. Mrs S Harris,
31. Mr I Burchess & Ms J Steer,

**Contact to be used for correspondence**

Martin Hollinshead,

Email:

## Preferred Option Site 272. Land East of Dunsley Drive, Kinver. 22 Houses (minimum).

### Location

Site 272 forms part of a particularly attractive area of Dunsley, an elevated, open reach of land, home to the historically important properties of Dunsley Manor and Dunsley House, and boasting a former vineyard.



Site 272 and its surroundings seen from Kinver Edge. Beyond the green sheep-grazed field, the land falls away to the A449. The distant ploughed field and woodland are on the other side of this road.

This Preferred Option site has a history of planning applications and development proposals, all refused for reasons that remain relevant today:

1. The site forms part of an all-too-narrow ribbon of Green Belt separating Kinver from the A449 and the adjoining conurbation of the West Midlands. In addition, Dunsley Drive itself forms a clear boundary between the developed area of Kinver and this vital ribbon. In South Staffordshire Council's Green Belt Review of 2014, the assessment of this area was: '**Makes a considerable contribution to Green Belt purposes**'. Indeed, so valuable is this ribbon of green, a previous planning judgement felt the site should be kept '**sacrosanct and inviolable**' and that the proposed development would '**entirely alter the rural character of the appeal area**'.
2. The site is elevated, close to the top of a ridge, and is prominent when viewed from many parts of Kinver village. The site also sits clear and attractive from higher surrounding viewpoints (examples being St Peter's Church, Kinver Edge and the Sheepwalks). Any building on this site would have a profound impact on the skyline and totally alter the flow of the landscape. Any development might also be seen from higher ground on the other side of the A449, which, to quote from an earlier planning application refusal, '**would be most unfortunate, because it would seriously diminish the visual continuity of the green belt in an area where it is quite close to the built up area of the conurbation**'.





Site 272 (beyond fence line) looking over houses on Dunsley Drive. This is an elevated and highly visible site. This photo also illustrates how far below the site existing properties lie (see later comment).



In the opposite direction, the rear of Site 272 (fence line) is dangerously close to the skyline.

3. Site 272 is the perfect stepping stone to the development of the land beyond, dragging Kinver still closer to the A449. Again, this has always been a worry and has been commented on during past planning discussions. Today a big swathe of the land beyond is owned by Barratt Homes – who have put it forward for housing. This land, Site 550, Land South of Dunsley Road, was dismissed (SHELAA table of sites) as unsuitable because it was **'disassociated from any village development borders'**. Poor access was also discussed. But if Site 272 went ahead, this land would not be disassociated from the village border.

Better access might also be possible. A stable block, physically part of the field that Site 272 is being taken from, would, if the site went ahead, be left undeveloped: it would be a separate parcel of land that has its access on Dunsley Drive. This land, could, conceivably, provide access to the ground beyond.

4. To preserve the integrity of this site, any development would have to be of such low level that any benefits would be negligible and far outweighed by the negative impact. Certainly the 22 houses (minimum) suggested would be very difficult to imagine on this site.

In addition, more recent observations would include:

5. The site lies within HEA area of particular sensitivity, and borders a Conservation Area.
6. The site lies on the wrong side of Kinver for school access. All school traffic would have to negotiate the already congested high street.

### **Defensible Boundary?**

Having noted the long-established worry of development creeping beyond Site 272, the role Dunsley Drive plays in terms of the Green Belt boundary needs emphasising.

When Green belt is being considered for development an important issue is whether or not the new boundary will be 'defensible', will provide a feeling of 'permanence' that will check further expansion. Defensible, clear boundaries would include: railway lines, woodland, established hedgerows and roads. Dunsley Drive has always been viewed as the clear and obvious Green Belt boundary in this part of Kinver. It has been referred to over and over again in planning discussions; it is a bold and physical line. Beyond Dunsley Drive, on the opposite side of Site 272, there is no defensible boundary, potential development facing nothing more substantial than a time-weary post and wire fence. To move the boundary to this feeble line from such a well-defined barrier for the sake of such a small development, and put the area at risk of further development, would surely be very difficult to justify.

### **Conservation Area Buffer Zone**

Extract from South Staffs Planning Policy:

*The revised Conservation Areas with Management Plans and Appraisals included Buffer Zones. These are areas in which inappropriate development would have an adverse effect upon the character and integrity of the buildings and land within conservation areas. Almost all of the newly designated conservation areas have Buffer Zones. The Council will seek to ensure that development within Buffer Zones preserves or enhances the special interest of the conservation area and causes no harm to that special interest. Buffer Zones are also seen as being important in protecting accustomed views into and out from conservation areas by ensuring that they remain protected from inappropriate forms of development, and seeing that due regard is paid to accustomed views in the formulation of public realm works or enhancement schemes.*

To the south, Site 272 shares a boundary with Kinver Conservation Area. If the site were developed, the approach to this Conservation Area would be severely damaged. Dunsley House, sitting in the Conservation Area, [https://www.sstaffs.gov.uk/doc/171770/name/Kinver\\_rs.pdf/](https://www.sstaffs.gov.uk/doc/171770/name/Kinver_rs.pdf/) would be totally obliterated, altering a view that has been enjoyed for hundreds of years (Dunsley House is often referred to as dating from the early 19th century, but there are elements in the fabric of this building that suggest a much earlier period). This proud house has a rich history and is an integral feature of Dunsley. Indeed, with a highly popular footpath running along Dunsley Drive from Dunsley Road,



this house and its adjoining woodland, which the footpath runs through, has always been the gateway to the walks and unique cottages of the Conservation Area. Site 272 is this gateway's priceless Buffer Zone.



Looking across Site 272 to Dunsley House in the Kinver Conservation Area

When exiting the Conservation Area, the Buffer Zone is important again; this due to a group of immediately-visible buildings that add significantly to this area's appeal. These buildings are Dunsley Manor and its barns. This group, lying to the east across Site 272 and dating to the 16th century, work with Dunsley House to frame this high corner. Dunsley Manor is not in the Conservation Area, but it requires consideration when assessing the Buffer Zone. If Site 272 were developed it would be hidden when leaving the Conservation Area.

Dunsley House and Dunsley Manor are not listed buildings. However, they are considered Key Non-Designated Heritage Assets, Dunsley House, HER MST 17983; Dunsley Manor, HER MST 17980.



Dunsley Manor and barns

### **The wider heritage picture**

Even if the Buffer Zone argument were removed, Site 272 could still demonstrate huge importance to this area. Without it this whole reach of Dunsley becomes fragmented, historic buildings that have shared an association for centuries, suddenly becoming isolated and of diminished cultural value. And here, another Non-Designated Heritage Asset comes into play – the barns of Dunsley Farm, HER MST 17982. These barns sit opposite Dunsley House, across Site 272, and work with Dunsley House and Dunsley Manor to give this area a feeling of age and value – to help the observer visualise a past working landscape.



Dunsley Farm barns

And this landscape is accessible. The Dunsley Drive footpath (which also forms part of a bridleway) has been noted, but a second footpath climbs up to this area from the A449. The rambler on this route breasts the ridge to suddenly enter this old landscape and take in the massive views right over Kinver. It's very difficult to imagine blending a new housing development into all of this.

### **Impact on Existing Properties in Dunsley Drive**

#### **Tower block effect**

The development of Site 272 would have a considerable impact on existing properties. All the properties along Dunsley Drive sit well below the level of the road, but Site 272 sits considerably higher than the road. With Dunsley Drive being so narrow, the overpowering impact of any new development is immediately obvious. Even if the rear gardens of new properties abutted the road, a development would be massively overbearing.





All the existing properties along Dunsley Drive sit well below Site 272.

### **The Great Wall of Dunsley**

The bank boundary along Dunsley Drive also needs to be considered in another way. Without a sufficiently wide buffer zone, any solid (2m) fencing would sit at a massive height above the road. Such fencing, be it to mark the boundary of the new development or to enclose gardens, would run along Dunsley Drive like some Great Wall. In this gentle and mature landscape, where solid fencing is conspicuous by its absence, the result would be catastrophic. Even with a wide buffer strip, and careful planting, the Dunsley Drive boundary has the potential to create a huge ugly scar on the landscape and totally ruin the approach to the Conservation Area.

### **Flood risk to existing properties**

The bulk of Dunsley Drive (all of the narrow section) is a non-porous surface without a single road drain along its length. With all the properties sitting below the road, it is only through a collective effort that the flooding of homes is avoided. Even so, a considerable amount of water runs down this road, pooling, and under exceptional rainfall, running in a torrent down some driveways.

Because Site 272 is higher than the road and runs slightly uphill, there is a worry that any loss of the land's highly porous surface will cause surface water to run onto the road. This would have disastrous consequences. Also important is that the land behind Site 272 continues to run uphill, and so the risk is compounded.

### **Landslip**

With the topography of this site and its surroundings outlined, another very real concern is the possibility of landslip caused by SUDS drainage on any new development. The whole area Site 272 sits in is one huge bank running down to Dunsley Road.

### **Vehicular access**

If a new development were to go ahead, access will be off the wider (previously altered) section of Dunsley Drive, just before it narrows to the single lane. This will exacerbate what is already a massive problem.

Fifteen households (fourteen along the road; one on the canal side) are served by the single-lane section of Dunsley Drive. There are no passing places; the elevated field bank boundary contains trees and shrubs; and the road itself has a marked curve. The result is a one-vehicle-wide road with poor visibility. It is an everyday, many-times-daily occurrence that vehicles meet head on and one has to reverse all the way back along the road.

Larger vehicles, once committed from the wider end of the drive, often find themselves wedged in a section of road they cannot progress along due to the curve and narrowness. Even if they do manage to force their way to the end, often they cannot turn. Because of this it has become standard practice to have large vehicles reverse in slowly with someone guiding them. In such cases the vehicle begins this difficult approach by turning and readying itself right where Site 272 has its proposed access.

And with this another consideration. Five properties sit opposite the proposed access to Site 272. These properties were built in 1981 and occupy a short cul-de-sac that does not have a turning area for larger vehicles. As with the narrow section of Dunsley Drive, large vehicles turn and reverse down. Often, as in the case of refuse and recycling collections, the vehicle does not even attempt to reverse down, but remains half in, half out, protruding onto Dunsley Drive opposite Site 272's proposed access.

In 1974 The County Surveyor recommended planning refusal on highway grounds for the following reasons: ***'Dunsley Drive is of insufficient capacity to accommodate the additional traffic which the proposed development would generate.'*** Since this recommendation, the 1981 properties have been built and more houses have been added along the narrow main section of the road. As noted, alterations have made the beginning of the road a little wider, but the plain fact is, Dunsley Drive is vastly overdeveloped already. Originally a dirt-track access to Dunsley House, and a footpath, the decades have past to see it slowly carrying an ever increasing burden. That so much development has been allowed is astonishing. Dunsley Drive is totally overwhelmed by traffic. A development on Site 272 would, in one stroke, give it twice as much! There would be utter chaos. South Staffs Council and Highways need to consider this issue very carefully indeed.



The narrow section of Dunsley Drive lies straight ahead.  
Proposed access to Site 272 on left. To the right, access to a cluster of 5 properties.





Exiting the narrow length of Dunsley Drive onto the wider section.



The entrance to the properties opposite the proposed access to Site 272.

### **Private road**

Dunsley Drive is a private road. The owners of Site 272 (Basterfield Group Ltd.) control some, but not all, of the road in the area of the proposed access. Some sections lie beyond their jurisdiction. Also, the bank running all along the narrow part of Dunsley Drive, beginning immediately where the road narrows, is not under the control of Site 272. If to gain access to the site and/or meet Highway requirements, alterations to land not under the control of the site owners were required, this including signs and road markings, residents would vigorously oppose the actions.



It is also worth noting that any sewer pipework from a new development would have to use Dunsley Drive to connect to the public sewer along Dunsley Road, which would almost certainly require excavating sections of the private road that are not controlled by the owners of Site 272. Foul water sewers from all the existing properties along Dunsley Drive connect to Dunsley Road through rear gardens. There is no foul water sewer along Dunsley Drive.

### **Pedestrian Access: Issues with Dunsley Road**

There is a pavement on the wider section of Dunsley Drive that leads to Dunsley Road. However, at present, this pavement takes its users over a long section of grass verge and to several steep steps at the roadside, where Dunsley Road has to be crossed. Even for the fleet of foot, this crossing, with its poor visibility and the junction to Hampton Grove right opposite, is an unsettling experience. For the elderly, those with mobility problems or those with pushchairs, this is a dangerous piece of road.

The steep climb down/up could of course be modified. What would be more difficult to alter would be the crossing point: further down Dunsley Road and the already poor visibility gets worse; further up Dunsley Road and the opposite footpath sits atop an embankment. And with all of this, unless changed, the highway here, as it enters Kinver, has an open speed limit almost right up to the crossing point.

With massive verge and highway changes – and perhaps a 'zebra crossing' – an acceptable pedestrian crossing point might be achievable. But such a crossing, with its signs and road markings, would look very out of place on this attractive approach to Kinver.

*Note: The need to cross Dunsley Road was not mentioned in the Preferred Options documents.*



The current crossing point for Dunsley Drive pedestrians.



## **The Long Climb**

An important focus with new developments is promoting less reliance on the car. And here, as soon as Dunsley Road is crossed, another point against Site 272 shows itself – the gradient! From the village, the long climb back up to Dunsley Drive will make the car very tempting every time a loaf of bread or carton of milk is needed. Add this to the already mentioned school run traffic, and Site 272 would hardly be flying the green flag.

## **An Alternative Option: Site 576 Land off Hyde Lane (west)**

Even this brief examination of Site 272 raises serious questions about its suitability. If there were no other choice, necessity might explain it being selected. But there is another choice: Site 576 Land off Hyde Lane (west), also a Preferred Option. This site is vast (8.49 hectares) compared to Site 272 (0.98 hectares) and could easily swallow the entire housing requirement for both sites. In the South Staffs SHELAA table of site suggestions, Site 576 is given a capacity of 163 houses. And yet it is only being put forward for 22 (minimum).

Like Site 272, Hyde Lane has been assessed (2014) as making a considerable contribution to the Green Belt. However, the argument for development here is far, far stronger:

1. It is far less prominent on the landscape and abuts more developed areas, thus allowing a much better visual integration of any new houses.
2. It allows immediate and trouble-free vehicular and pedestrian access (onto Hyde Lane).
3. When viewed from high points, the landscape beyond shows no vast urban expanse (as with Site 272), but continuing countryside.
4. There is no Conservation Area to consider, as there is with Site 272.
5. There are no nearby Designated or Non-Designated Buildings, unlike site 272.
6. No footpaths run through or alongside it. Thus there is no impact on rambling and walking, unlike Site 272.
7. And, of huge significance, it is the correct side of the village for schooling, Potters Cross Pre-School Playgroup, Brindley Heath Junior School and Kinver High School all being a short walk away.

It is also worth noting that Site 576 allows easy pedestrian access to near-by Kinver Edge, lies opposite a public footpath leading to the canal system, and is also a short (level) walk from a cluster of useful businesses, including Potters Cross post office and general store, a veterinary practice, a physiotherapy clinic, a hairdressers, a beauty clinic and, a little further, a dentist. Indeed, historically, Potters Cross has always enjoyed its own identity and been something of a free-standing little community. It might be argued that development on this side of Kinver could create more business opportunities.

Road access is good too: this whole area is easily accessed from the A458, with no congested High Street to negotiate.

## **Unacceptable sacrifice**

There appears to be only one argument against letting the Hyde Lane site incorporate the 22 Dunsley site houses: South Staffordshire Council has a desire to use some smaller sites, plots of less than one hectare. This is not a requirement they have to meet: if they are not available, they are not available. Indeed, Site 272 is, in its original entirety, a little larger than one hectare. A chunk has

been removed (the already mentioned stable block) to make it fit. And of course Site 576, in its original form is, as noted, vast. So, two oversized sites on opposite sides of the village have been cut down to meet a desire to submit two small sites.

In 2019 a development vision for Site 272 was submitted to South Staffs Council by Bellway Homes. This submission shows the plot in its entirety (including the stable block) and with a much wider road frontage than the current site. With less of the plot now fronting Dunsley Drive, would access still be achievable? If not, and more of the original site were needed (stable block), then the main argument for Site 272, that it is a small site of less than one hectare, fails.

If smaller sites are the focus, two sites could easily be moulded at Site 576. This whole area of land was originally submitted as two separate sites: 576 and 271. Why not separate them again and have a site in each? But far more logical and far less destructive to the landscape, would be to simply abandon the plan for two small sites and have 44 houses on Site 576. They would be absorbed easily. Instead, Site 272, a massively valuable area of Green Belt is being considered for sacrifice.

## **In Conclusion**

Key points against Site 272:

- **It is elevated and highly visible**
- **Is in an area of particularly sensitive Green Belt**
- **There would be no 'defensible' boundary**
- **There would be significant damage to the Historic Environment and Conservation Area**
- **There are huge vehicular access issues**
- **For pedestrians, a hazardous road crossing**
- **It would promote car use**

In our considered view, there are no 'evidenced' or 'justified' exceptional circumstances (required by National Policy) for altering the existing and well-established Green Belt boundary formed by Dunsley Drive. The choice of Site 272 cannot demonstrate, cannot come anywhere near to demonstrating exceptional circumstances. There is simply no argument for its selection. There is no logic to it. No sense. And there is NO need. South Staffordshire Council should look again at the very sound arguments against development of this site and honour the decades-long protection this area has been afforded.

## **ADDITIONAL DOCUMENTS**

Tony McGlue of AJM Planning Associates Ltd. has been commissioned to evaluate the justification for the allocation of Site 272 by reference to both the Council's documentation and National Planning Policy. A copy of this evaluation is attached at Appendix A.



**Martin Hollinshead**  
**30 November 2021**

# **Appendix A**

## **AJM Planning Report**



PLANNING AND DEVELOPMENT CONSULTANTS

**A New Development Strategy for South Staffordshire 2018-2038**

**The Local Plan Review**

**Preferred Options - November 2021**

**ANALYSIS OF**

**Site proposal 272 – Land East of Dunsley Drive, KINVER, DY7 6NB**

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## **A New Development Strategy for South Staffordshire 2018-2038**

### **The Local Plan Review**

#### **Preferred Options - November 2021**

#### **Site proposal 272 – Land East of Dunsley Drive, KINVER, DY7 6NB**

From the **Forward to the Council’s publication** above, the “...consultation sets out preferred sites based on robust planning evidence ***with infrastructure at its heart.***” (my emphasis).

**From the publication itself**, the **Council’s Site Selection criteria** provide for:

- i) achieving sustainable development by locating new housing where there is greater access to facilities and public transport, thus reducing car dependency (para. 1.10); in a way that improves infrastructure, services and facilities for existing and new households (para. 1.17) and in locations with better access to existing infrastructure and services or where new development could facilitate new infrastructure delivery (para. 4.15)
- ii) the enhancement of the natural environment through sympathetic new development and via biodiversity net gain/green belt compensatory measures etc. (paras. 1.17; 3.49 – Strategic Objective 1; para. 4.4; Policy NB2) with a need also to protect and enhance landscapes (policy NB4)
- iii) Green Belt only being released where necessary and fully justified. (Para 4.2)

In addition, the preferred strategy seeks to provide 10% of new housing on sites less than 1 ha. in extent in order to accord with National Planning Policy (para. 4.15) and also seeks to achieve a minimum density target of 35 dwellings/ha. (Para. 6.7 and Policy HC2).

The basis of the proposals for Kinver is described in **Para. 4.46**, as follows:

*“Housing growth in the village will be delivered through additional small site allocations of less than one hectare alongside the delivery of the safeguarded land identified adjacent to the village. This approach balances the historic character of the village, the extent of Green Belt land in this area and the relative level of services and facilities in Kinver compared to other settlements in the district. **It also has regard to the opportunities for smaller villages in the district to help the Council meet its duty to allocate a certain proportion of growth on sites of less than one hectare**“.* – (my emphasis)

From the **Housing Site Selection Topic Paper**, **Site 272** is described thus:

*Land East of Dunsley Drive*

*“Unlike some of the other potential Green Belt sites around the village, **the site is free from significant constraints** (my emphasis) (e.g. Highways Authority concerns, potentially significant impact upon the historic environment). The site is of a similar landscape sensitivity to most other land around the village, but is of lesser Green Belt harm than other sites in this area. As the site is only one hectare, allocation of the full site would also deliver growth that is of a scale that reflects the Council’s preferred spatial housing strategy”*  
(Para. 5.7.8)

**The Council’s supporting SUSTAINABILITY APPRAISAL** concludes that the development of site 272:

- i) Has a minor negative impact re harm to green belt
- ii) Has potentially a major negative impact to landscape sensitivity
- iii) Has a minor negative impact on the local landscape character
- iv) Is within the target distance of the GP surgery
- v) Has a minor negative impact on the local landscape due to the proximity of a public footpath
- vi) Has a minor negative impact on the local landscape since it would alter the views experienced by local residents
- vii) Could potentially alter the character or setting of the Conservation Area and, as a result, have a minor negative impact on the historic environment.
- viii) Could potentially have a minor negative impact on historic character.
- ix) Would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape
- x) Would be likely to have a minor positive impact on site end users’ access to bus services.



- xi) Would be expected to have a minor positive impact on site end users' opportunities to travel by foot because of proximity to public footpath
- xii) Would be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility
- xiii) Is located wholly or partially outside the target distance to local service and so could potentially have a minor negative impact on the access of site end users to local services.
- xiv) Locates new housing wholly or partially outside the target distance to schools providing education for all primary ages, and therefore, the proposed development would be expected to have a minor negative impact on the access of new residents to primary education
- xv) Would be expected to situate new residents in locations with good access to secondary education, and therefore, a minor positive impact would be expected
- xvi) Locates new housing in or adjacent to areas with 'poor' sustainable access to employment opportunities, and therefore, the proposed development would be expected to have a minor negative impact on site end users' access to employment.

**From the COUNCIL's SITE PROFORMA within the supporting Housing Site Selection Topic Paper Appendix 3, Site 272 will:**

- i) Have a major negative effect re landscape criteria
- ii) Contribute to the delivery of 10% of sites less than 1 ha..
- iii) Be 210m from bus stop; 960m from nearest village/neighbourhood centre; 1.8km from nearest education facility
- iv) Score "green" for harm to historic environment
- v) Have lower green belt harm than majority of land around the village
- vi) Perform better than other site options re site assessment factors

This is in the context that there are ***"Insufficient non-green belt opportunities to deliver the infrastructure led strategy identified for Kinver, so that additional growth is required above existing level of safeguarded land and allocations in the settlement"***. (my emphasis)

**From the Council’s Infrastructure Delivery Plan 2021, Appendix A, the only potential infrastructure improvements identified for Kinver are:**

*“Potential junction improvements at White Hill/Meddins Lane and Meddins Lane/Enville Road, Kinver; alongside measures to increase sustainable travel to school.”* It is stated that there is no preferred design, funding or business case approved for any of the above and that they are expected to be provided with contributions from developers of consented housing sites.

**From the Preferred Options Publication:**

The overall housing target for the District is set at 8,881 (Table 8) – *“In total, this distribution of growth **exceeds the minimum amount of land release required to meet the district’s 8,881 dwellings housing target.** (my emphasis). This will help the plan to meet the national policy requirement to respond to changing circumstances in the plan period.”* (Para 4.18)

Para. 5.7 and Policy SA5 refer to the estimated capacity of each site proposal as *“minimum”*.

**Material National Policy (NPPF) in relation to Site Selection and the green belt, emphasise:**

- i) Sustainability and locating new development where it will enhance or maintain the vitality of rural communities and support local services (NPPF 79)
- ii) Where land is removed from the Green Belt (GB) to accommodate new development, there is a need for compensatory measures re other GB to enhance opportunities for access; for outdoor sport and recreation; enhancing landscapes , visual amenity and biodiversity etc.(NPPF 143)
- iii) New green belt boundaries should be clear, using physical features that are readily recognisable and so unlikely to be altered within plan period (NPPF 143)
- iv) 10% of housing requirement on small sites (less than one hectare) unless strong reasons why it cannot be achieved (NPPF 69)
- v) that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans (NPPF 136)

**In relation to all the above considerations, Site 272**

- \* is a significant distance from local services, the GP surgery and schools and this is compounded by the fact the site is in an elevated position relative to these facilities, reducing the potential of travelling by foot**
- \* provides no mechanism to protect or enhance the natural environment or provide any compensatory measures re other areas of green belt**
- \* will result in various harms to the local landscape resulting in more than “minor” harm overall**
- \* will result in various harms to historic character resulting in more than “minor” harm overall (in contrast to statement in the Site Proforma)**
- \* is not supported by any evidence that it will enhance or maintain the vitality of Kinver’s community or contribute to any improvement to infrastructure, services or facilities which would rely upon the proposed development to be sustainable**
- \* is not in a location which could legitimately contribute to the new infrastructure needs identified for Kinver – it does not, therefore, “*..deliver the infrastructure led strategy identified for Kinver*”**
- \* as put forward (minimum 22 dwellings), fails to meet the density target and applying this target to Site 272 would be inappropriate in view of site characteristics and character of locality**
- \* proposes a new green belt boundary formed principally by a post and wire/rail fence with one or two trees/bushes**
- \* meets the small site criteria but the site promotor sought an enlarged area of 1.2has.**
- \* is not proven to be “*..free from significant constraints..*” In particular, there has been no detailed assessment of highway considerations and, as above, there is potentially a significant impact upon the historic environment etc.**

Moreover, although the Council's documentation assesses the proposed development of Site 272 to have a "*minor negative impact re harm to green belt*", previous professional assessments have considered the site and its context in the following terms:

*"There is no doubt in my mind that this two-mile gap between the built-up area of Wollaston, the western limit of the West Midland Conurbation and the built-up area of Kinver is a most important one and a most vulnerable one. It is the first section of more or less open countryside which west bound traffic meets and for that reason above it should be kept sacrosanct and inviolable"* - Source -1960 Appeal Inspector

*"I consider that the site would detract from the rural appearance of the area* - Source - 1976 Appeal Inspector

- Development would have to be at a low density to respect the adjacent housing (12 units)
- Development would to some degree be prominent in the landscape particularly when viewed from the south-west
- Move dangerously close to the important ridgeline to the east leading to pressure for skyline development
- Development would detract from the rural appearance of the area despite presence of existing buildings to the north and Dunsley House to the south
- Dunsley Drive forms clear boundary to the village at this point
- The development would be an unnecessary intrusion into the green belt in this sensitive and vulnerable area in the narrow gap between Kinver and the conurbation

Source -Summary of Council representation to Local Plan Inquiry in 1980

**From all the above, it is considered that the selection of Site 272 for housing development is:**

- \* INCONSISTENT IN PART WITH SITE SELECTION CONSIDERATIONS WITHIN BOTH THE COUNCIL'S DRAFT STRATEGY & ALSO NATIONAL POLICY**
- \* NOT JUSTIFIED AT ALL BY REFERENCE TO IDENTIFIED INFRASTRUCTURE NEEDS FOR KINVER**
- \* NOT JUSTIFIED BY ANY OVERRIDING HOUSING NEED THAT CANNOT BE MET ELSEWHERE IN A SITUATION WHERE THERE IS BOTH A PROPOSED OVERSUPPLY AND ALSO, POTENTIALLY, UNDERESTIMATED SITE CAPACITIES**
- \* ONLY APPARENTLY JUSTIFIED BY THE NEED TO FIND SITES BELOW 1Ha IN SIZE. THIS IS NOT CONSIDERED, IN ITSELF, TO BE AN EXCEPTIONAL CIRCUMSTANCE JUSTIFYING THE REMOVAL OF THIS LAND FROM THE GREEN BELT**

**Moreover, it is considered that the detrimental impact and the harm to Green Belt has been underestimated by the Council. Dunsley Drive currently forms a clear physically identifiable boundary to the Green Belt beyond. The new Green Belt boundary proposed is formed principally by a post and wire/rail fence which is considered to be inappropriate as a secure long-term boundary.**