

Appendix 2 to the minutes of the Planning Committee held on the 14<sup>th</sup> December 2022.

### **Paragraph 1.7 - Local Plan Tackling Climate Change**

Alongside South Staffs Council Kinver has declared a climate emergency. While we welcome the ambitious plans the Council has for mitigating the impact of new developments on climate change, we feel the plans could go further still, especially regarding the carbon reduction targets in new build housing.

### **Paragraph 3.5 – Neighbourhood Planning**

We feel the Local Plan should place greater emphasis on the role of Neighbourhood Development Plans in helping local communities shape how their settlements will grow and develop in future years, and the influence of these plans in shaping the look, feel and composition of new developments. We would welcome greater encouragement towards communities developing their own Neighbourhood Development Plans. South Staffordshire currently has no Neighbourhood Development Plans in place although several are likely to come forward to be adopted, including Kinver Parish Council (submitted for adoption).

### **Section 5 Policy DS1 – Green Belt**

We believe the policy underestimates the economic benefits of the Green Belt. Historically Kinver has been a recreational destination for residents of the conurbation and the contribution these visitors make to the local economy have a demonstrable benefit towards maintaining a vibrant High Street and local services.

We are certainly the most visited destination in South Staffordshire and the National Trust have estimated 250,000 visitors per year visit its countryside site alone.

We feel the local plan underestimates the social and environmental benefits of the Green Belt on the local area, including the nearby conurbation.

We have concerns regarding the loss of agricultural land to housing and its impact on national food security.

### **Section 5 Policy DS2 – Green Belt Compensatory Improvements**

Kinver has a mosaic of landscapes, including areas of heathland and dry acid grassland habitats, many of which have become fragmented and consequently isolated and vulnerable. We welcome the proposals for Green Belt compensatory improvements but urge that the local plan enshrines a collaborative approach with local conservation organisations to ensure the best possible outcomes from any proposals.

Staffordshire Wildlife trust and the National Trust are already collaborating on initiatives to identify wildlife corridors and wildlife recovery opportunities and therefore make ideal partners for local Green Belt Compensatory initiatives.

### **Section 5 Policy DS3 – Open Countryside**

In a similar way to Policy DS1 the provision of open countryside brings an economic benefit to areas such as Kinver. Kinver Edge offers a superb vantage point and attracts numerous recreational visitors, many of whom contribute to the local economy. Identifying and protecting landscapes which can be shown to have direct economic and social value should be more strongly articulated in the policy. Kinver Parish Council remains concerned about the impact of site 274 on the view from Kinver Edge, and developments on this site must take the impact on the open countryside into consideration.

### **Paragraph 5.17 Additional housing to contribute towards the unmet needs of the GBBCHMA**

We have every sympathy with the authority in trying to establish what contribution, if any, it should make to the wider housing market area under the duty to co-operate. It is our interpretation that the 4000 dwellings identified to meet the wider housing market exactly equates to the number of new dwellings planned on land being released from the Green Belt. We do not see the evidence to support this number of new homes being built on the Green Belt. Given the apparent political imperative from central government to protect the Green Belt, reduce target driven house building, and the implication of the removal of the duty to cooperate, alongside the collapse of the Black Country local plan review, we feel that while the local plan has identified sites where future releases could be made, the necessity to safeguard them for building is not met at this time. It would be helpful to identify which sites in the Local Plan are proposed as part of the duty to cooperate, and which are to meet local housing requirements. We eagerly await confirmation of new government proposals and feel the plan should include provision for how it can be updated if required.

### **Paragraph 5.45 Housing Growth in Locality 5**

Locality 5 represents the 'pan handle' of the South Staffordshire district. The plan correctly identifies that there is little unmet housing need in the adjacent metropolitan authority (Dudley). The presumption must be therefore that Green Belt releases in this locality will be servicing the Wolverhampton area to the north. Traffic congestion on the A449 trunk road is a significant feature of the district. The additional traffic implications of housing being allocated to the locality, alongside developments in neighbouring authorities, does not appear to have been fully assessed. We would expect to see greater consideration of the health and environmental implications of increased traffic congestion on the A449 to and from Wolverhampton in the plan. At peak times the traffic already queues on the A458 through Wollaston all the way to the Stewpony traffic lights, a 2-mile stretch. Similarly, from the other direction on the A458 from The Fox at Stourton to the Stewpony Traffic Lights. This is unacceptable.

The A449 already represents a significant physical barrier preventing connectivity and effectively dividing the Parish in two. We feel the plan should go further to identify how the challenges presented by an increasingly busy road can be overcome, especially within the context of promoting active travel.

### **Paragraph 5.65 Policy DS5 – Spatial Strategy**

Kinver is identified as a tier 2 settlement. The original description presented of Kinver was not accurate and many of the facilities are no longer available in the Parish. Currently Kinver does not have many of the services usually attributed to a tier 2 settlement. A newly built leisure centre is currently only available for use by the local High School, with no community use agreement in place (this is under consultation). The village has a community run library, and a small health centre – however many appointments are arranged for the clinic in Kingswinford, which is difficult to access especially by public transport. The public transport links are poor with infrequent direct services to Kidderminster and Stourbridge only. There are no designated safe cycling routes to or from the village. We would expect the local plan to identify how tier 2 villages can be brought up to and maintained at a common standard of local facilities.

### **Paragraph 5.66 Policy DS6 – Longer Term Growth Aspirations**

We welcome the Local Plans emphasis on longer term objectives. We feel too little emphasis is being placed on regional collaboration to identify suitable new settlement sites, especially given the changing infrastructure opportunities arising from HS2 and the Midlands Metro extension. We would particularly welcome collaboration at a county-wide level to identify where future development can achieve the most economic and social benefit.

## **Paragraph 6.4**

### **Kinver development site – 274**

This site was released from Green Belt under a previous plan and is now land safeguarded for building. The current site consists of two meadow fields, the slightly northern one fronting White Hill has received outline planning consent for 38 dwellings (20/00621/OUT). The plan identifies a proposal to allocate a minimum of 82 dwellings on the southern of the two fields. Both fields are of similar sizes, the southern field is particularly sensitive; it shares a long boundary with the National Trust Kinver Edge nature reserve and is bisected west to east by a public right of way which forms part of the iconic Staffordshire Way.

It is our view that the housing allocation for the second phase of a minimum of 82 dwellings is too high for this site. We would seek assurances that the landscape character of the Staffordshire Way is not jeopardised by this development and the environmental impact on the adjacent nature reserve is carefully mitigated. We have mentioned elsewhere the landscape value of this site in the open countryside views to and from Kinver Edge and seek careful mitigation of the impact of the development of this site.

Kinver Parish Council would not want to see the loss of the public right of way crossing the site but would be willing to consider some realignment/diversion of the Staffordshire Way within the parish utilising other existing rights of way to help maintain Kinver as a popular walking destination.

There remain significant concerns regarding the development of both phases of site 274 and its impact on traffic movements at the White Hill-Potters Cross junction. This junction is especially important for school traffic using the nearby Kinver High and Brindley schools, and we hope that any proposed scheme for the second phase of the development includes plans for how traffic to and from the site can be managed.

### **Kinver Development site – 576**

We refer to our previous observations on the necessity test for Green Belt releases not being met.

Site 576 offers a small development with an identified area of 'Green Infrastructure'. We refer to our previous observations regarding Green Belt Compensatory Improvements and that any proposals should be designed in collaboration with local conservation bodies.

In many respects we recognise that this site creates a more consistent settlement boundary. We would seek to understand the future of the small triangle of land to the West of the development. This small area is excluded from both house building and green infrastructure, but due to its size and shape will be unmanageable for farming.

Currently this site is in continuous use for agriculture, and we remain concerned about the loss of productive farming land on national food security.

This site, like most in or around Kinver will require careful consideration of its impact on the Mill Brook/River Stour flood risks.

We recognise that much of the vehicular traffic from this development will exit the village towards the Hyde Lane/Bridgnorth Road junction. This junction may require improvements if the traffic flows through the junction continue to increase.