

KINVER PARISH COUNCIL

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Dear Local Plans Team,

Planning and Compulsory Purchase Act 2004

Town and Country Planning (Local Planning) Regulations 2012

South Staffordshire Local Plan Regulation 19 Pre-submission draft

Response on behalf of Kinver Parish Council

This response has been prepared by Kinver Parish Council to the Draft South Staffordshire Local Plan, Regulation 19 consultation.

General Comments

We welcome the updating of the Local Plan. It is clearly important to have an up-to-date plan for the District.

We support the reduction in the overall housing figure. This is reflective of our own area, with a decrease in Kinver's population since 2011. This reduction has clearly translated into the continued protection of green belt, a key asset of South Staffordshire, preserving the separation of our rural district from the urban conurbation of Birmingham and the Black Country. We note there is no further green belt release proposed in Kinver Parish and the renewed emphasis on protecting our Green Belt and open countryside; and use of brownfield sites where possible, is welcomed.

We also welcome the greater emphasis on accessibility of new homes, and the push towards net-zero new homes, this is also strongly supported in our 'made' Neighbourhood Plan.

Part A: Context and Development Strategy

Evidence Base:

The SHELAA updated in 2023 references site 274 (a) and (b). Site A has an extant permission and the appendix acknowledges this. It also states in the summary for site B that it is 'within HEA area of particular

sensitivity'. It is unclear how this would be mitigated should the site be released from safeguarded. This is clearly at odds with National Planning Policy and guidance, with particular reference to biodiversity.

Site A is rated green and site B is marked as amber due to the policy constraints. i.e not currently developable.

The constraints listed are:

- Within HEA area of particular sensitivity
- PROW runs through the site

To these we would add

- Important green infrastructure site, accessible to local community and a linking corridor between Kinver Edge/National Trust land and the rural surroundings.
- The site is crossed by the long-distance Staffordshire Way, as it descends from its origin on Kinver Edge.
- Adjoins National Trust land, and is closely connected by woodland to the SSSI of Kinver Edge.
- Habitat corridor between areas of lowland heath, a rare habitat. The Sandscapes project led by the National Trust aims to regenerate and link areas of lowland heath, and this site is within an area of strategic importance to strengthen habitat links between Kinver Edge and Highgate Common.
- The HEA assessment regarding views to and from Kinver Edge (NT); and historic Potter's Cross Farm
- Issues of access and impact on road/pedestrian safety due to the increase in population.

Policy DS5 – The Spatial Strategy to 2041

Settlement Hierarchy

It is noted that Kinver is a proposed Tier 2 settlement. Its current services are limited. Its rural nature and distance to other service centres, together with poor public transport connections and timings and a lack of infrastructure facilities, results in very high car dependency, and restricts access of the young or those of limited means to jobs, education and services. The build-out of site 274 will put additional strain on services and cause a substantial increase in car travel. We consider that this site is not sustainable without addressing these issues.

- Connectivity – Kinver is one of the most isolated settlements in South Staffordshire, with long journey times, necessarily by private vehicles, to nearby facilities (supermarkets, hospitals etc). Public transport is limited with only a rural bus service. The timings are unsuitable for commuting or access to post-secondary education. Access to most South Staffordshire Council services is not practicable by public transport. Car ownership is essential, making Kinver an unsustainable location for growth.
- Associated infrastructure: The doctors' surgery is already close to capacity. Residents often have to travel to the main surgery at Kingswinford, which requires 3 bus journeys and over an hour to reach, and is too far for patients to walk to (6 miles).
- The sports and outdoor recreation facilities are limited, there is no swimming pool and the community use of the sports centre has limited opening hours and facilities.

Housing Need:

The population of Kinver has fallen since 2011. The Neighbourhood Plan caters for growth within the Neighbourhood Area. The rate of windfall developments is substantial relative to the district average (8-12 per annum in recent years) and the settlement is entirely within the green belt. The proposed Safeguarded land for new homes is unsustainable for the reasons outlined previously.

We consider that the method of arriving at 'housing need' in the proposed Local Plan undervalues windfall developments. It also does not indicate how actual build-out and windfall during the life of the Plan, will affect the calculation of need and the rate of bringing sites forward.

The Housing Needs Assessment for the Kinver Neighbourhood Plan identified specialist provision for the rising elderly population as an important need, given the lack of such provision within the area. Such provision could release housing for younger people and families. We believe that a creative approach to such development, with multi-level, flexible care provision and on-site facilities could provide a complement to existing provision, and bring employment.

The district's wider rural area:

We welcome the emphasis on use of brownfield sites, and would welcome further clarification of the approach to redevelopment and repurposing of redundant buildings and brownfield sites outside the settlement boundary, which may be overwashed by greenbelt but provide potentially useful sites.

Part B: Site Allocations p52:

Policy SA3 Housing Allocations and Housing Site Selection Topic Paper 2024

RE site 274 : Land South of White Hill

Comparing site assessments in the area, we note that this site is listed as 'no major negative or positive effects are predicted' where for other, less prominently visible, less locally important sites, in less sensitive positions, the assessment admits to landscape damage. Several other factors, listed below, indicate that when applying the criteria consistently the proposed site would not have been considered favourable for development.

Furthermore, if the site is developed, these factors would require careful attention and mitigation to minimise damage. These factors include:

Heritage and Landscape damage.

- The land lies just below Kinver Edge, and is prominently visible from the toposcope viewpoint. It provides the only green/rural foreground to views of the Kinver Edge escarpment.
- Biodiversity and wildlife damage:
 - The Sandscapes project led by the National Trust and Staffordshire Wildlife Trust, to link areas of lowland heath, seeks to re-establish, protect and link areas of the rare lowland heath mosaic habitat. This site is within an area of strategic importance to strengthen links between Kinver Edge and Highgate Common.
 - The Kinver Neighbourhood Plan Nature Recovery Report by Staffordshire Wildlife Trust identifies this site as being on one of the narrower parts of the Heathland Habitat Connectivity Opportunity Area identified in this report. Restoration and creation of heathland mosaic is stated as a priority. Establishment of heathland mosaic on or adjacent to this land would greatly contribute to the value of this corridor.
 - Protection of hedgerows, trees, and the boundary with adjacent green spaces is vital
- Amenity loss or damage
 - The site includes an early section of the Staffordshire Way long distance footpath. The proposed development would create urban surroundings for this beautiful path.
 - The site has for long been used as a recreational / walking area for local people, being readily accessible, on foot and without climbing a steep ascent. Loss of this amenity has not been taken into account in the assessment, nor is it clear how such usage would be protected at this location, for local people. We note that policy HC19 of the proposed Local Plan seeks to protect such sites.
- Access to facilities and Active travel:
 - Such a large increase in housing will cause a corresponding increase in car journeys given the limited public transport and facilities. This is counter to current policies.
 - Provision for walking and cycling is currently poor (narrow roads and pavements, and the only reasonable exit from the site being via a congested and potentially dangerous junction by local schools, at Potter's Cross).

- The scale of proposed development would not result in improvements or additional infrastructure, making the settlement unsustainable in a rural location.

We also note that during previous consultations on both the Kinver Neighbourhood Plan and the Local Plan 2022, there was substantial local opposition to development of site 274, both with respect to site location and scale.

One recurring local concern is the ability of the nearby White Hill/Meddins Lane/Enville Road junctions to absorb the additional vehicular traffic from this site, especially during the pick-up/drop-off times at the adjacent Brindley and Kinver High schools. This junction will be on the primary route to and from the development. Within the last 12 months one child has been injured by a moving car as they negotiated cars obstructing the pavement and we would expect to see any proposal for the development of this site to be accompanied by proposals to safeguard pedestrian, especially school age pedestrian, safety at this junction.

274a is currently being developed, and the impact of this on the local area has not yet had chance to be monitored / observed. Once 274a has been completed the capacity of the local area to cope with the additional traffic and surface water run off needs to be tested / re-assessed before any further development takes place especially 274b.

Part C: Homes and Communities

Policy HC2: Housing Density

As a tier 2 settlement housing should fit the local semi-rural character. The AECOM design codes developed for the Kinver Neighbourhood Plan make clear that typical housing density locally to the site is at most 20 dwellings/ha, and lower towards the village fringes. Policy HC2 should make reference to the design policies in the Kinver Neighbourhood Plan which refer to degree of set back, pattern of place and other characteristics that are reflective of typical housing density design in the area. To vary this in a rural settlement would create the sense of urbanising a rural historic village.

Policy HC4: Homes for Older People and others with special housing requirements and Policy HC5: Specialist Housing

The HNA prepared for the Kinver Neighbourhood Plan points up the increasing need for specialist housing, given the ageing demographic, and lack of such specialist support within Kinver. We welcome the Local Plan emphasis on M4(2) accessibility in new housing. However there is a need for housing with additional support and flexibility, providing different tiers and types of care provision, on-site facilities, and transport, to cater for greater dependency.

Large brownfield sites suitable for such multifaceted provision are rarely within the settlement boundary. The proposed Local Plan supports redevelopment of brownfield sites, to reduce the pressure on Green Belt, and it is consistent with Policy EC4. The rural exceptions policy does not apply to such site-specific opportunities, partly because of location. However with suitable on-site provision and flexibility of design, plus services, as is current best practice, such a site could overcome the disadvantages of developments away from village centres for the target clientele, and provide local employment. The issues are very different to those regarding location of housing for young families.

HC17 Open Space

We are concerned that the provision of open space in new developments should be on-site, since contributions for off-site facilities are unlikely to be sufficient to purchase land and create such facilities, nor is there normally appropriate space available in the immediate vicinity of developments. Any offsite provision will therefore be inaccessible to the new communities created, and inadequate.

Policy HC19: Green Infrastructure

We welcome the support for green infrastructure laid out in this policy, but feel that this could be strengthened and made more specific. We note there is no mention of Local Green Spaces anywhere in the Plan.

While the Local Green Spaces Topic Paper 2024 presents a useful overview of legislation, we feel it fails to clarify the special and complementary nature of LGS designation compared to other protections:

- *Based on value to local people*: LGS is the only protection which takes account of the value local people attach to a site.
- *Specific to location*: LGS is the only protection which is truly site-specific. (Green Belt sites are assessed only against the purposes of Green Belt, such as separating towns, making it possible to argue that an individual parcel is not very important. Wildlife and sports/amenity sites can be set aside if, in the judgement of the planning authority, similar habitats or amenities are available nearby).

This is clearly a missed opportunity, and policy enhancement should be linked to Biodiversity Net Gain projects.

Part D: Economic Prosperity

Policy EC12: Sustainable transport

While we welcome this policy, we believe it should contain explicit reference to cooperation with adjacent authorities, notably the Combined Authority, since so many settlements (including Kinver) have their main or only public transport links to the conurbation, rather than to other parts of Staffordshire. Arranging that some of the bus services continued beyond the first depot, to additional popular destinations (hospitals, shopping malls etc) as they did in the past, would reduce journey times and simplify transport for rural residents.

We also consider that the LCWIP should include more focus on smaller settlements, for whom good cycling routes could provide a credible alternative to car travel when public transport is inadequate – particularly with the availability of electric bikes. Many of these settlements, including Kinver, are also the focus of much of the rural tourism in the area, so that good non-car transport routes from the conurbation could provide active-travel access to green spaces for urban residents.

Part E: The Natural and Built Environment

Policy NB2: Biodiversity

It is disappointing that BNG has not been set beyond the minimum, for example to 20%.

Policy NB5: Renewable and low carbon energy generation

We welcome the support expressed for renewable and sustainable energy. We are however surprised that there is no mention of specific support and encouragement of rooftop solar, which is less hampered by infrastructure inadequacies.

Policy NB6A: Net zero new build residential development (operational energy)

We welcome this policy.

Off-site contributions/ offsetting: We would encourage the council to consider whether additional support for energy-saving retrofit and rooftop solar and would be a suitable target for offsetting options.

Conversely, we urge the council to review scientific carbon-balance evidence before including planting of trees among offsetting options. Plantations often have little or even negative longterm carbon reduction impact, compared to the pre-existing permanent vegetation. It's not the same as turning back the clock on deforestation. Planting trees onto arable land takes land out of food production, thereby increasing the need to import food. Solar panels would be far more effective than trees, per unit area, at reducing CO2 (See eg news.climate.columbia.edu/2022/10/26/solar). Furthermore, considerable funding is already available for tree planting. Priority should be given to reduction of fossil fuel use and expansion of renewable energy.

Policy NB6C: Embodied carbon and waste

Item Ca, we consider that the whole life carbon assessment (RICS) should be compulsory.

Policy NB7: Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality

We welcome this policy, while noting that the Flood Zones currently in use may not fully represent the true risk, given that globally, climate change mitigation measures are lagging far behind the commitments made, on which original modelling has been based.

The statement 'Discharge should not be made into the combined sewer system' should be strengthened to 'must not'. Discharges into the sewer system increase the risk of raw sewage discharges to rivers due to storm overflow, which is already documented as a serious problem in this area. (Mill Lane Sps, in the centre of Kinver, overspilled sewage 43 times into the River Stour in 2023: <https://theriverstrust.org/key-issues/sewage-in-rivers>).

Summary

We hope that the above comments are constructive and helpful. The Local Plan could be strengthened further in key areas, especially around Climate Change mitigation measures, biodiversity and nature, and transport.

We do have real concerns over the inclusion of site 274b. Kinver Parish Council considers the proposed allocation of site 274b would result in unsustainable development, harm to the green belt and would be contrary to the current emphasis in national and local policy on protection of green belt. If the site goes ahead, major adaptations to minimise the damage to the site, its heritage, amenity, community, PROW, biodiversity and landscape value are needed.

Yours Faithfully



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Parish Clerk - Kinver Parish Council