

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

**South Staffordshire Council
Local Plan 2023 - 2041**

Please return to South Staffordshire Council by 12 noon Friday 31 May 2024

This form has two parts –
 Part A – Personal Details: need only be completed once.
 Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal 2. Agent's Details (if Details* applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Personal - Mrs Jennifer Cree, Parish Clerk, Kinver Parish Council, 95 High Street, Kinver, DY7 6HD. 01384873878 clerk@kinver-pc.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation: Kinver Parish Council

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
(3) Complies with the Duty to co-operate	<input type="text"/>	<input type="text"/>	No	<input type="text"/>
Yes				

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Data Protection

Your details will be added to our Local Plans Consultation database so that we can contact you as the review progresses. South Staffordshire Council will process your personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Our Privacy Notice can be viewed at [Data Protection \(Strategic Planning\) | South Staffordshire District Council \(sstaffs.gov.uk\)](#)



Please return the form via email to localplans@sstaffs.gov.uk or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX