

10 December 2021

Delivered by email

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Dear Ed

SOUTH STAFFORDSHIRE LOCAL PLAN REVIEW: PREFERRED OPTIONS CONSULTATION (BELLWAY HOMES LTD – LAND EAST OF DUNSLEY DRIVE, KINVER)

These representations are submitted on behalf of Bellway Homes Limited (Bellway) in response to the South Staffordshire Local Plan Review (LPR) preferred options consultation paper (November 2021). These representations have also been submitted online via the Council's consultation portal.

Bellway is promoting land east of Dunsley Drive, Kinver. It represents a sustainable and deliverable residential opportunity for up to 36 new homes, and public open space and associated infrastructure.

The site is proposed to be released from the Green Belt and allocated for a minimum 22 new homes (site 272 under draft policy SA5).

The site and its surroundings

The site is located to the eastern edge of Kinver, within walking distance of the village centre. The site comprises agricultural land which gently slopes from east to west.

It is bound by existing residential development to the north, south and west, and open agricultural land to the east. The site's western boundary is formed of existing hedgerow interspersed with trees, beyond which lies Dunsley Drive from which the site gains its access. Northern and southern boundaries are formed of existing residential properties and their associated curtilage. The site's eastern boundary is formed of a post and wire fence with some boundary tree and hedgerow planting.

The site benefits from good access to a wide variety of services and facilities located within the village centre, including a primary and secondary school, a Co-op convenience store, post office, butchers, bank, bakery, dental practice, doctor's surgery, opticians, community centre and a range of public houses and restaurants.

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The site is within 200m of a bus stop served by the 228 route (on Dunsley Road), which provides an hourly service (Monday to Saturday) to Stourbridge, the Merry Hill Shopping Centre and Russell's Hall Hospital. Further services, including a railway station with high frequency services to Birmingham and Kidderminster, are offered in Stourbridge, a larger town 5km to the east of the site.

The site is considered in South Staffordshire's 2018 Strategic Housing and Employment Land Availability Assessment (Site ref: 272). The site is identified as 'suitable' and that it should be considered further as part of the LPR.

The Historic England online register indicates that there are no listed buildings or scheduled ancient monuments within the site. The nearest listed building is the grade II Rockmount House 590m to the south, separated by intervening development and the River Stour and associated floodplains. The Kinver Hillfort scheduled ancient monument is 1.6km to the west. The site's southern boundary adjoins the Kinver Conservation Area, and the Kinver Canal Conservation Area is 330m at its closest point.

Initial feasibility work indicates that a satisfactory access can be achieved off Dunsley Drive. Further work is being undertaken to demonstrate this. The site is not constrained by any existing infrastructure such as utilities, pylons or public rights of way.

History of promotion and evidence base

We first made representations promoting the site to the Spatial Housing Strategy and Infrastructure Delivery (October 2019) consultation. Before then the site had been assessed by the Council's 2018 Strategic Housing and Employment Land Availability Assessment (site ref: 272). A feasibility layout was submitted with these representations, along with landscape and visual, and heritage technical notes (appendices 3 and 4 respectively of our previous representations).

We are now preparing a detailed evidence base, which will inform an updated masterplan for the proposed allocation. In addition to the landscape and heritage work already undertaken the following documents are being prepared and will be submitted to the Council once complete:

- Topographical survey
- Highways technical note
- Ecology technical note
- Drainage technical note
- Opportunities and constraints plan
- Updated masterplan

Representations to questions

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the new Local Plan?

The scope of the evidence base prepared to inform the emerging plan is generally robust and proportionate. However, it is noted that the transport modelling work has yet to be published (expected in 2022). This will be critical to informing the new plan and may require changes to the preferred options consultation plan to reflect its findings.

Notwithstanding the wider, general robustness of the evidence base, there are a number of site specific inconsistencies regarding the evidence base and the conclusions that have been drawn from it, as summarised below.

Landscape and visual

The Landscape Study (2019) assesses the site as part of a much wider parcel comprising 74.77ha of land to the east of Kinver as being of a 'moderate-high' sensitivity. Paragraph B.14.4.4 of the Sustainability Appraisal (SA) (2021) concludes that the site's location within this parcel and its associated landscape sensitivity justifies a 'major negative' score for the land east of Dunsley Drive (site 272) in the scoring matrix. No justification for this score is provided beyond its location with the parcel.

The development area proposed by Bellway in the feasibility layout for land east of Dunsley Drive submitted with our previous representations (which is to be updated) is 0.9ha. This represents a very insignificant proportion of the wider area assessed (**1.2%**). The Council should undertake further assessment work to assess the specific parcels proposed for allocation.

EDP's Landscape Position Paper (Appendix 3 of our previous representations) summarises that the site has limited features of value that if appropriately designed can be a well-integrated and contiguous area of the village. Visually the site is enclosed through the combination of landform and mature landscape features surrounding it. Additionally, the adjoining residential development sandwiches the site within built form, enclosing it and limiting direct views from Kinver. From the wider countryside views are limited to the site's immediate geographical area, there are no long distance views.

It is therefore the case that any land to be developed based on any of the options proposed would have 'moderate' landscape sensitivity at most. Combined with any landscaping that could be provided, post mitigation development at the site is capable of scoring 'neutral' in terms of landscape and townscape.

Question 2: Do you agree that the correct infrastructure to be delivered alongside proposed site allocations been identified in the IDP?

Is there any other infrastructure not covered in this consultation document or the IDP that the Local Plan should seek to deliver?

We have no objection to the potential junction improvements at White Hill / Meddins Lane and Meddins Lane / Enville Road, indeed the need for these improvements were first identified as part of the adopted Site Allocation Plan. Land east of Dunsley Drive could make a proportionate contribution to these off-site highway improvements.

Beyond the above, no further infrastructure requirements are identified for Kinver.

Question 3: Have the correct vision and strategic objectives been identified?

Do you agree that the draft policies (Chapters 4 and 5) and the policy directions (Chapter 6) will deliver these objectives?

The objectives rightly reflect the District's need for new homes, as well as the contribution to the unmet needs of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA), and that new development should be focused in sustainable locations either in or around the District's key villages, or through urban extensions.

However, there is no explanation as to which settlements constitute 'key villages'. It has to be presumed that Tier 2 settlements are included within this definition.

In terms of strategic objective 9 it should acknowledge that new development will also maintain and enhance the vitality of South Staffordshire's rural communities, as recognised by NPPF paragraph 79.

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside? If no, please explain how these policies should be amended?

We have no comment on these policies, which deal with non-strategic residential development on land remaining in the Green Belt and open countryside.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038? If no, please explain how this policy should be amended?

Overall spatial strategy and need

South Staffordshire's overall spatial strategy to 2038 is supported insofar as it seeks to deliver a minimum of 4,881 dwellings for the district's own needs, plus a contribution of 4,000 dwellings towards meeting the GBBCHMA shortfall. This is appropriate and reasonable given that South Staffordshire has a clear and strong relationship with the GBHMA, with significant proportion of South Staffordshire's residents commuting to elsewhere within the GBBCHMA (61%¹ in total).

The key strand underpinning the spatial strategy that growth is distributed to the South Staffordshire's most sustainable locations to avoid a disproportionate level of growth in the less sustainable settlements is also supported. This reflects the requirements of the NPPF.

Plan period

South Staffordshire's needs are based on a plan period of 2018-2038. NPPF paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. To achieve this the plan would have to be adopted by 31 March 2023. The current schedule for this review is that the plan will be adopted in winter 2023, on this basis the plan would not meet the requirements of NPPF paragraph 22. The plan period should therefore be extended to reflect this.

Question 6: Do you support the policy approach in and Policy DS4 –Longer Term Growth Aspirations for a New Settlement? If no, please explain how this policy should be amended?

We have no comment on the approach to a new settlement given it is understood this will address needs in future plan reviews and not meet any need arising in this plan.

Question 8: Do you support the proposed housing allocations in Policy SA5?

We wholly support the principle of the proposed release of land east of Dunsley Drive, Kinver (site 272) from the Green Belt and allocation for housing growth. The Council's evidence base is clear it performs better than other options at Kinver. Bellway is now preparing a detailed site specific evidence base for the site which will inform an updated masterplan. This will be submitted to the Council in due course, once complete.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6? If no, then please provide details setting out what changes are needed, referencing the Policy Reference number (e.g HC1 - Housing Mix).

We provide our response to the relevant draft policies below:

¹ Staffordshire Rural Economy Evidence Base Final Report (July 2015)

- **Policy HC1 (housing mix)** – we have no objection to any housing mix reflecting that in the latest Housing Market Assessment. Any policy should however allow for some flexibility in the mix should evidence be submitted demonstrating that demand in that location requires a different mix to that prescribed by the Housing Market Assessment.
- **Policy HC2 (housing density)** – as set out in our representations to the Preferred Options consultation, whilst seeking for new development to achieve 35 dwellings per hectare, any policy should include sufficient flexibility as when determining factors specific to each site at the development management stage, such as character, appearance and neighbouring land use, it may be that a lower density is appropriate.
- **Policy HC17 (open space)** – whilst there is no objection in principle to open space being provided centrally, the policy should allow some flexibility if the design rationale for a site justifies locating it elsewhere.

Question 12: It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree these are strategic policies?

Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies? If yes, then please provide details including the Policy Reference (e.g HC1 – Housing Mix)

Policies DS1 – DS4 and SA1 – SA7 represent policies which are limited to those necessary to address the strategic priorities of the area, providing a starting point for any non-strategic policies that are needed as defined by NPPF paragraph 21.

Summary

Bellway welcomes the opportunity to engage with the South Staffordshire Local Plan Review.

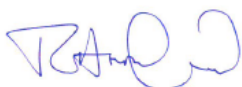
Overall we broadly support the plan's vision, objectives and spatial strategy, including the proposed release of land east of Dunsley Drive, Kinver from the Green Belt and allocation for housing growth.

There are also some concerns regarding the application of the plan's evidence base. Bellway's proposals for land east of Dunsley Drive represents less than 2% of the total area assessed in terms of landscape sensitivity, which has been used to inform the SA's scoring matrix. The Council should undertake a more detailed assessment of the proposed allocation areas to provide more accurate scores.

Bellway is currently preparing a more detailed site specific evidence base for land east of Dunsley Drive, including an updated masterplan. This will be submitted to the Council in due course.

We would welcome the opportunity to discuss the site and these representations with officers further.

Yours sincerely



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