

South Staffordshire Regulation 19 Publication Document

Statement of Representations

Land off Hyde Lane (west) and Land at Dunsley Drive,
Kinver

Submitted on behalf of Bellway Homes Ltd

May 2024

Contents

South Staffordshire Regulation 19 Publication Document	1
1. Introduction	1
2. Soundness of the Publication Plan 2024	3
3. Response to Draft Strategic Policies	5
4. Response to Draft Development Management Policies	13
5. Summary	15
Appendix 1: South Staffordshire Regulation 19 Publication Document, Statement of Representations- December 2022	17
Appendix 2: Land off Hyde Lane, Kinver – Site Location Plan	18
Appendix 3: Land off Hyde Lane, Kinver – Vision Document	19
Appendix 4: Land east of Dunsley Drive, Kinver – Site Location Plan	20
Appendix 5: Land east of Dunsley Drive, Kinver – Evidence Base documents (Heritage, Landscape, Drainage, Ecology and Highways)	21
Appendix 6: Counsel Advice Note	23
Appendix 7: Turley Falling Even Shorter Report	24
Appendix 8: EDP Heritage and Landscape Technical Note	25
Appendix 9: Kinver Parish Council’s minutes of the meeting held on 14 December 2022	26
Appendix 10: Representations to Policy NB6A: Net Zero New Built Residential Development (Operational Energy) and Policy NB6C: Embodied Carbon and Waste	27

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Client

Bellway Homes Limited

Our reference

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1. Introduction

- 1.1 These representations are submitted on behalf of Bellway Homes Limited (“Bellway”), in response to the South Staffordshire Local Plan Review (“LPR”) Regulation 19 consultation.
- 1.2 Bellway welcome the opportunity to make representations on the final draft version of the Local Plan in terms of soundness and legal compliance. For completeness, our representations to the Regulation 19 public consultation held in December 2022 can be found at **Appendix 1**.

The Sites

- 1.3 Bellway is promoting two sites at Kinver:

- Land west of Hyde Lane, Kinver
- Land east of Dunsley Drive, Kinver

Land west of Hyde Lane, Kinver

- 1.4 Land off Hyde Lane is a 8.49ha site to the north of Kinver, a site location plan is enclosed at **Appendix 2**. It represents a sustainable and deliverable residential opportunity for between 45 and 200 dwellings, alongside public open space, and associated infrastructure. The site had previously been released from the Green Belt and proposed for allocation for up to 44 new homes in the 2022 Publication Plan (Site Ref: 576) and has since been omitted from the current Publication Plan (2024).
- 1.5 The site has capacity to accommodate up to 200 dwellings, although the previous allocation of the site in the 2022 Publication Plan included 44 dwellings on the southern part of the site. This is detailed in the updated Vision Document at **Appendix 3** of this Statement. It is therefore capable of making a greater contribution to Kinver’s housing needs should it be necessary to reduce the size of the White Hill proposed allocation, or the needs of the wider District given that the anticipated delivery rates on strategic sites are ambitious (as discussed in our previous representation at **Appendix 1**) and to meet the needs of the District, or additional needs from the Greater Birmingham and Black Country Housing Market Areas (GBBCHMA) as detailed in these representations.

Land east of Dunsley Drive, Kinver

- 1.6 Land east of Dunsley Drive has also been promoted through the Local Plan Review, a site location plan is enclosed at **Appendix 4**. It represents a sustainable and deliverable residential opportunity for up to 36 new homes, public open space, and associated infrastructure.
- 1.7 This site was proposed by the LPR preferred options paper (November 2021) to be released from the Green Belt and allocated for a minimum of 22 new homes (previously site 272), however, the site has been omitted from the Publication Plan. Notwithstanding this, it remains a suitable and deliverable option to meet Kinver and South Staffordshire’s wider housing needs. Updated detailed information for the site is included at **Appendix 5** which has informed the initial illustrative plans for the site.

- 1.8 We first made representations promoting the site to the call for sites in 2017 (SHLAA ref: 272). Since then, the site has been promoted through the different stages of the LPR and is supported by a comprehensive evidence base, as summarised in **Appendix 1**, and updated at **Appendix 5**.

Bellway Homes

- 1.9 Evolving from a local family business to a FTSE 250 major PLC, Bellway builds exceptional quality new homes throughout the UK, delivering almost 11,000 new homes across the UK in the last year. They are an established five-star housebuilder as a result of their emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.
- 1.10 Bellway, with their consultant team, have and will continue to seek to work closely with the Council, statutory consultees, and other stakeholders through the development plan process, and as the housebuilder for the site with a strong track record for delivery, will ensure careful attention is given to viability and costs in plan making.
- 1.11 Bellway welcome the opportunity to further engage with the LPR through the Regulation 19 consultation. We respond to the Publication Plan at **Section 2, 3 and 4** of these representations and provide a summary at **Section 5**. The statement provides further context to responses set out in the consultation forms which are also submitted on behalf of Bellway Homes.

2. Soundness of the Publication Plan 2024

Compliance with the National Planning Policy Framework (“NPPF”) (December 2023)

- 2.1 Please refer to the Counsel Advice Note at **Appendix 6** alongside the below.
- 2.2 The plan sets out the approach to growth for South Staffordshire over the plan period, including the spatial strategy and approach to development in the Green Belt and Open Countryside. The previous Publication Plan (November 2022) was planning for 9,089 homes, including a 4,000-home contribution of unmet needs to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).
- 2.3 Towards the end of the consultation in December 2022, the government launched a consultation on a revised NPPF, which proposed no requirement to review Green Belt boundaries to meet housing needs. Since the 2022 iteration of the Publication Plan included significant Green Belt release, to meet the needs of South Staffordshire but also to provide contributions to the GBBCHMA unmet needs, the submission of the plan was postponed until the NPPF was updated.
- 2.4 The revised NPPF was published in December 2023, paragraph 145 sets out that: *“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*
- 2.5 The updated 2024 Publication Plan now being consulted upon revises the strategy for growth, specifically reducing the proportion of Green Belt release. The emerging Plan now sets out a housing need over the Plan period of 4,086 to 2041, with a minimum 227 dwellings to be delivered per annum, a substantial decrease from that which was proposed in the 2022 Publication Plan. The contribution to the unmet needs of the GBBCHMA have also been substantially reduced from 4,000 dwellings in the November 2022 Publication Plan to just 640 dwellings (a total reduction of 3,360 homes), 16% of what was previously being planned for.
- 2.6 As a result, several previously proposed housing allocations on sites to be released from the Green Belt, including the Land off Hyde Lane, Kinver (Site ref: 576), have been removed from the Plan.
- 2.7 Paragraph 230 of the most recent 2023 NPPF sets out that:
“The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre- submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements.”
- 2.8 As set out in the Counsel Advice Note at **Appendix 6**, Regulation 19 consultation on the Publication Plan was undertaken in November – December 2022 and therefore the Plan

will be examined in accordance with the previous provisions of the NPPF. Removing allocations requiring the release of Green Belt land from the emerging plan to align with the December 2023 NPPF does not therefore accord with this paragraph and as such, the strategy upon which the amended Publication Plan 2024 is based is unsound and does not accord with the NPPF.

3. Response to Draft Strategic Policies

Cross boundary issues and the duty to cooperate, and Strategic Objectives

- 3.1 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.2 There are a number of plans across the HMA intending to be submitted before the government's likely deadline of 30 June 2025 for being examined under the current system, rather than that contained in the Levelling Up and Regeneration Act. In particular this includes Dudley, Sandwell and Wolverhampton. All three of these authorities have published draft plans with proposed allocations for regulation 18 consultation. In all cases, none propose to meet their own need, in doing so none intend to release any Green Belt for new homes. For Dudley and Wolverhampton, this represents a change to their approach in the now abandoned Black Country Plan.
- 3.3 Irrespective of the relevant NPPF which applies, both the 2021 and 2023 versions include a requirement to comply with the duty to cooperate (it is also a legal requirement). The duty should not be used as a 'race to the bottom' to disregard the scale of housing need across the HMA up to 2031, which the Turley "Falling Even Shorter" report (enclosed at **Appendix 7**) demonstrates stands at **40,676 homes up to 2031**. It should be used as a way to strategically plan and meet the HMA's total needs.
- 3.4 Ultimately it is not clear how the HMA authorities intending to submit before June 2025 can meet the duty to cooperate when leaving such a significant scale of unmet need. All HMA authorities, including South Staffordshire, should be working together to agree how the unmet need up to 2031, as a minimum, is going to be met. This unmet need represents real people in need of a home, now. This will require difficult decisions to be made in terms of Green Belt release. The previous Publication Plan (2022) demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 additional homes which can contribute to the GBBCHMA unmet need.
- 3.5 It is noted that Wolverhampton City Council Cabinet agreed to submit representations to the South Staffordshire Publication Plan 2024 at their meeting on the 22nd May responding that, of the 640-home contribution provided by the emerging plan, 464 homes (72.5%) should specifically be allocated to Wolverhampton. This notwithstanding, should the majority of the contribution be allocated to Wolverhampton, it is unclear what proportion would be allocated to the other Black Country authorities and further underlines the uncertainty over how the HMA authorities collectively will demonstrate that they have met the DtC requirements.
- 3.6 The reduced contribution of unmet needs the Publication Plan (2024) now proposes is also not reflective of the functional links between South Staffordshire and the Black Country and the wider HMA. The needs of the Black Country should be met in locations as close as possible to where the need arises, as such, South Staffordshire is encouraged to revisit the contributions proposed and reengage with the wider HMA authorities, particularly given other authorities are also not providing sufficient contributions to meet the growing unmet needs of the Black Country.

Policy DS1: Green Belt

- 3.7 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.8 As set out in Section 2 of this Statement, the core theme of the Publication Plan is focussed on protecting the Green Belt, which forms strategic objective no. 1 of the Publication Plan (2024). This theme has been emphasised in this revised Publication Plan through the removal of many proposed Green Belt allocations previously proposed by the 2022 Publication Plan. This is based on a fundamental misinterpretation of Paragraph 145 and 230 of the NPPF. It is noted that 80% of South Staffordshire is designated as Green Belt, whilst 14% is Open Countryside, and brownfield land is limited with most large sites already developed (as set out in Paragraph 5.3 of the Plan), which severely restricts where development can be located in the District, and which has become even more challenged given the omission of Green Belt release from the emerging plan.
- 3.9 This notwithstanding, we have no in principle concern in respect of the wording of draft policy DS1 itself and support the plan as a whole, however we emphasise the importance of reconsidering the approach to reviewing the Green Belt given the provisions of the NPPF and how the Plan will be examined, and also to ensure South Staffordshire is able to meet its own needs, whilst also providing a proportionate contribution to the GBBCHMA unmet needs befitting its functional links to the Black Country.

Policy DS2: Green Belt Compensatory Improvements

- 3.10 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.11 The policy is considered to align with NPPF paragraph 147 which states that the removal of land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Planning practice guidance clarifies that this could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity and habitats, new or enhanced walking and cycling routes, and improved access to new or existing recreational and playing field provision. Sufficient flexibility is provided by the policy where contributions could be provided in lieu of a specific scheme being identified, which is supported. As such, it is considered to be sound.

Policy DS4: Development Needs

- 3.12 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.
- 3.13 South Staffordshire's housing need (using the standard method), as set out by the Publication Plan 2024, over the plan period requires delivery of 4,086 homes by 2041, whilst an additional 640 dwellings over the plan period are to be delivered to contribute to the unmet needs of the GBBCHMA. Combined, the total need planned for by the emerging plan is 4,726 dwellings over the plan period.
- 3.14 By contrast, the Publication Plan 2022 set out a need in the district of 5,089 dwellings to 2039 and planned for a 4,000-dwelling contribution to the unmet needs of the GBBCHMA. The total number of dwellings planned for totalled 9,089 over the plan period.

- 3.15 This change is predicated on the basis that the changes to the NPPF (December 2023) no longer require Green Belt review to meet housing needs, and the subsequent allocation of sites for development currently designated as Green Belt have been omitted from this iteration of the Plan. As set out in response to policy DS1 and in Section 2 of this Statement, this is not justified in the context of Paragraph 230 of the NPPF, and this cannot therefore be relied upon as justification for not reviewing the Green Belt in South Staffordshire.
- 3.16 This change represents a substantial decrease in the number of dwellings being planned for in South Staffordshire, to meet the district's needs as well as providing a contribution to the GBBCHMA. As set out in response to duty to cooperate above, all HMA authorities, including South Staffordshire, should be working together to agree how the unmet need up to 2031, as a minimum, is going to be met. This unmet need represents real people in need of a home, now. This will require difficult decisions to be made in terms of Green Belt release. The previous Publication Plan (2022) demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 additional homes which can contribute to the GBBCHMA unmet need.
- 3.17 The above should therefore be reflected in the plan's overall housing need and accordingly policy DS4.
- 3.18 The Publication Plan 2024 substantially decreases the number of dwellings being planned for in South Staffordshire, to meet the district's needs as well as providing a contribution to the GBBCHMA. Having regard to the Housing Market Assessment (2022) a housing need of 241 dwellings per year was established using the Standard Method, which has been updated by the Strategic Housing Market Assessment Partial Update (2024), reducing the need to 227 dwellings per year. As such, 4,086 dwellings are currently being planned for to meet South Staffordshire's needs over an 18-year plan period alongside a contribution of 640 dwellings to the GBBCHMA.
- 3.19 As noted by Policy DS4, approximately 10% additional homes will be provided to "*ensure plan flexibility*", this is not however reflected in the housing target, which would increase the need by 473 dwellings. It is assumed the District intend to provide for this allowance through windfall sites, however, to plan positively and to ensure sustainable development comes forward, additional sites should be allocated to meet this need, particularly since the updated Housing Assessment also projects an increase in the number of working age people moving to the District over the plan period, accommodating these people will be key to the long term economic growth and social sustainability of the District. These sites could be drawn from the pool of omitted sites, which have been assessed as deliverable and available, for instance Hyde Lane, Kinver, which has already been considered appropriate for development having previously comprised a proposed allocation in the 2022 Publication Plan. This approach would accord with the provisions of the NPPF which sets out at paragraph 35a) that for a plan to be considered positively prepared it should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

Policy DS5: Spatial Strategy to 2041

- 3.20 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

- 3.21 Strategic objective 2 reflects the change in approach towards the location of new housing since the Publication Plan 2022, focussing development in in Tier 1 settlements as opposed to locations *“either within or adjacent to the district’s key villages or through urban extensions adjacent to neighbouring towns and cities”* as set out by the 2022 Publication Plan (objective 2), which would have required Green Belt release.
- 3.22 The policy sets out that growth will be directed towards the most accessible and sustainable locations, whilst also ensuring that the natural and historic environment is maintained and enhanced to protect local distinctiveness.
- 3.23 Kinver is identified as a ‘Tier 2 Settlement’ within the policy. The village benefits from several bus services providing routes to Kidderminster, Stourbridge, Hagley, Wolverhampton, and some local routes. These settlements also include a number of train stations providing regional, as well as national connections. Stourbridge Junction station is the nearest, located approximately 7km to the east of Kinver. This station provides direct and regular rail services to Birmingham, Kidderminster, Solihull, and London. As such, Kinver is considered be highly accessible and is well served by good public transport links.
- 3.24 The village also benefits from a range of local facilities, for instance, a infants, primary and secondary school, public houses and restaurants, shops, and services, including a GP and dental surgery, further limiting the need for residents to travel for their day-to-day needs. On this basis, Kinver is considered to be a highly sustainable and accessible ‘Tier 2 Village’, capable of accommodating further growth.
- 3.25 Notwithstanding this, the Spatial Strategy limits the growth of Tier 2 settlements to delivery of appropriate allocations identified through the Local Plan, comprising *“suitable and deliverable non-Green Belt site allocations”*. This is not considered to be reflective of the inherent sustainability of Tier 2 settlements such as Kinver, which have been disproportionately restricted by the updated Publication Plan (2024). Furthermore, distributing growth to Tier 2 settlements would avoid placing undue pressure on higher Tier 1 settlements whilst also allowing for smaller settlements to benefit from investment, support for economic growth, and footfall from new residents using local services and businesses.
- 3.26 The omission of the Land off Hyde Lane, Kinver (Site Ref: 576) in the Publication Plan (2024) is in part a result of a misinterpretation of the NPPF (as set out in Section 2 of this statement). In addition, Paragraph 5.16 of the draft Plan also sets out that the Spatial Strategy of directing growth to Tier 1 settlements is based on the accessibility of these settlements by public transport. However, as set out above, Kinver benefits from a range of services and is highly accessible, adjoining the village edge and would provide much needed housing for the district. It is noted that there are proposed allocations in Kinver, including at White Hill, and in other Tier 2 settlements, including Wombourne, whilst these allocations are on safeguarded land and do not therefore require the release of Green Belt land, these settlements have been identified as sustainable locations for development. Therefore, it is considered that these settlements could provide further growth for the district to meet the needs set out in response to Policy DS4 and additional unmet needs from the GBBCHMA.

Policy SA3: Housing Allocations

3.27 As set out above, the revision to the Council strategy has resulted in the omission of several proposed allocations, previously included in the 2022 iteration of the Publication Plan, which would have required the removal of Green Belt land. Included in this, Bellway's site "Land off Hyde Lane (west)" (Housing Allocation 576 in the Publication Plan 2022) and "Land East of Dunsley Drive" (Site 272) have been omitted. The safeguarded "Land south of White Hill" (Housing Allocation 274) has been retained as the sole proposed allocation in Kinver.

Land off Hyde Lane (west) (Omitted site, Publication Plan 2022 Housing Allocation 576)

3.28 Notwithstanding the Council's revised strategy for growth, the Council's evidence base is clear this site performs better than other options at Kinver. The Housing Site Selection Topic Paper (2021) established that the Hyde Lane and Dunsley Drive sites performed well, being "*free from significant constraints*" and of "*lesser Green Belt harm than other sites*". It should be noted that the Hyde Lane Site Proforma at Appendix 3 of the Topic Paper (2021) scores the site very similarly to that of Land south of White Hill.

3.29 The southern and western edges of Kinver are significantly constrained by the Canal Conservation Area; Kinver Hillfort scheduled ancient monument and the Rock houses, as well as Flood Zones 2 and 3. Land to the northwest is constrained by highway capacity and access. In this context, land west of Hyde Lane (as well as land to the east of Dunsley Drive) represents a sustainable location for accommodating future growth in Kinver village. **Appendix 3** of this Statement provides an updated Vision Document for the site, which sets out that between 45 and 200 dwellings could be accommodated on site. The site was previously proposed for allocation of 44 dwellings by the Publication Plan 2022. However, Bellway present several options for the site, which establish that it is capable of accommodating a greater scale of growth.

3.30 Bellway have concerns regarding the scale of delivery at the proposed land south of White Hill. As demonstrated by the enclosed Vision Document (**Appendix 3**), the Hyde Lane site is capable of accommodating a greater scale of growth on the land available to the north, whilst the evidence demonstrates that the site is a sustainable location for growth with no constraints which cannot be overcome. The evidence base assesses it as having the same impacts as the majority of other proposed allocations in the plan, including those within Kinver:

- The Strategic Housing and Employment Land Availability Assessment (SEHLAA) (2022) identifies the site as potentially suitable.
- The LUC Landscape Study (2019) identifies the site as being of 'moderate-high' landscape sensitivity.
- The LUC Green Belt Review (2019) identifies that the loss of the site would represent 'moderate' Green Belt harm.

3.31 It would provide a similar response to Hyde Lane, creating a positive interface between Kinver and the surrounding countryside, and creating a "a more consistent settlement boundary", a significant benefit acknowledged by Kinver Parish Council in the minutes of their meeting held on 14 December 2022 (**Appendix 9**). It would also deliver a

significant benefit by increasing the area of Green Infrastructure proposed, as shown in option 2 of the Vision Document (**Appendix 3**).

Land south of White Hill (Housing Allocation 274, minimum capacity 120 dwellings)

- 3.32 Bellway has concerns regarding the likely impacts of developing this site.
- 3.33 As demonstrated by the updated EDP Heritage and Landscape Technical Note enclosed at **Appendix 8**, in terms of heritage impact, although the site's 'less than substantial harm' to the Kinver Camp Scheduled Monument is not an in-principle issue, NPPF paragraph 205 requires the Council to afford 'greatest weight' to the conservation of the monument as a designated heritage asset of the highest significance. NPPF paragraph 206 states that 'clear and convincing' justification should be provided for that harm, public benefits notwithstanding. As such, as set out by **Appendix 8**, *"the Council should look carefully for alternative sites at Kinver, which could come forward and deliver the same public benefits (in terms of delivering much needed housing) with less harm to designated heritage assets, before pushing ahead with the proposed allocation of a site where its promoters themselves acknowledge there would be "less than substantial harm" caused to a designated heritage asset."*
- 3.34 There are other sites available in Kinver such as the now omitted, land to the north of the Hyde Lane, or the de-allocated Dunsley Drive site which do not result in this level of harm and should therefore be preferable in the site selection process.
- 3.35 In landscape terms, EDP's note states that to accord with the local planning authority's evidence base and the prevailing landscape and visual character of the site, the extent of residential development currently illustrated is deemed to be an *"over-estimation of the sites development capacity in landscape and visual terms."* The design response to the Staffordshire Way would result in a major permanent and irreversible adverse effect, a point reiterated in Kinver Parish Council's minutes of the meeting held on 14 December 2022 (as **Appendix 9**). The development proposals do not provide a sufficient off-set space to the western boundary, which includes trees subject to Tree Preservation Orders. It should also include a far stronger link north south to link the phases together.
- 3.36 The Council should therefore carefully consider alternative sites at Kinver such as land at Hyde Lane (west) discussed above and land east of Dunsley Drive discussed below which could come forward and deliver the same public benefits, by providing much needed housing, with less harm to designated heritage assets and which will provide a better landscape and visual response, as demonstrated by the updated Heritage Appraisal and Landscape Position Statement for Hyde Lane appended to the Vision Document at **Appendix 3** and the updated evidence base for Dunsley Drive at **Appendix 5**.

Land east of Dunsley Drive (Omitted site, Preferred Options site 272)

- 3.37 Land east of Dunsley Drive was initially included as an allocation in the Preferred Option Plan, as housing site allocation 272.
- 3.38 The allocation was for a minimum of 22 dwellings on a site featuring good access and a natural extension to Kinver. The 2021 Housing Site Selection Topic Paper stated that,

unlike some of the other potential Green Belt sites around Kinver, the Dunsley Drive site is free from 'significant constraints' (e.g. Highways Authority concerns, potentially significant impact upon the historic environment). Paragraph 5.7.8 noted that 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.

- 3.39 The November 2022 Housing Site Selection Topic Paper discounts the site from the proposed housing allocations. The reasoning provided for this is the Stage 2 Historic Environment Site Assessment (HESA) (2022), which revised the scoring of the site from Green to Red. The basis of this is the predicted impact of development on the contribution that the site makes to the significance of the Kinver Conservation Area. The HESA states that development on the site would not in itself compromise the cultural heritage value of the overall Conservation Area to the extent that the values that led to its designation would be diminished. The Assessment contends however, that it would inevitably compromise the setting of the small character zone within the Conservation Area that is defined by Dunsley House and its hilltop position, as well as the setting of the non-designated asset itself. The HESA states that mitigation is unlikely to be possible and therefore a high (red) impact is predicted.
- 3.40 Nevertheless, the HESA also concludes that: *"The predicted level of effect upon both the setting of the non-designated house and the character of the Dunsley component of the Conservation Area would not be of such a level as to constitute 'Substantial Harm' in terms of the NPPF."*
- 3.41 The site does adjoin the Conservation Area in the far east (where it extends to include Dunsley House – a 'positive' building within the Conservation Area). The site does form part of Dunsley House's setting, however in the context of the Conservation Area as a whole, its contribution to Dunsley House's significance (the Conservation Area's special interest) is likely to be very small and so the 'harm' arising from its development would also be 'very small.' In terms of the NPPF this harm would, at worst, be less than substantial harm towards the lowest end of that broad spectrum.
- 3.42 Beyond heritage, Dunsley Drive scores similar to other proposed allocations at Kinver:
- The Strategic Housing and Employment Land Availability Assessment (SEHLAA) (2022) identifies the site as potentially suitable.
 - The LUC Landscape Study (2019) identifies the site as being of 'moderate-high' landscape sensitivity.
 - The LUC Green Belt Review (2019) identifies that the loss of the site would represent 'moderate' Green Belt harm.
- 3.43 The updated evidence base enclosed with these representations at **Appendix 5**, also demonstrates the site is not subject to any constraints which cannot be overcome. As such the evidence base does not justify the omission of land east of Dunsley Drive as a proposed allocation.
- 3.44 Policy SA5 should therefore be modified to reduce the capacity of land south of White Hill or delete it completely, to reflect its constraints (in particular heritage) and the

additional land north of the proposed Hyde Lane allocation and / or the omitted Dunsley Drive site should be added into the policy for a minimum capacity of around 40 homes each.

- 3.45 Bellway has concerns regarding the likely impacts of developing the site at White Hill. Updated Heritage and Landscape Technical Notes are included at **Appendix 8** of this Statement and set out the impact of development of the Hyde Lane site on the Kinver Camp Scheduled Monument, impact on landscape character considered to be unacceptable.
- 3.46 Based on the above, Policy SA5 should therefore be modified to reduce the capacity of land south of White Hill, or delete it completely, to reflect its constraints (in particular heritage). In addition, the allocations at Hyde Lane and Dunsley Drive should be reinstated to accommodate for the reduced capacity at White Hill. These sites could come forward early in the plan, given they do not require any major infrastructure for delivery and are otherwise unconstrained. They would deliver the same public benefits (in terms of delivering much needed housing) with less harm to designated heritage assets and will provide a better landscape and visual response than that at White Hill.

4. Response to Draft Development Management Policies

Policy HC1: Housing Mix

4.1 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy HC2: Housing Density

4.2 The policy sets out minimum density requirements for development, including 35 dwellings per hectares in Tier 1-3 settlements, which includes Kinver, this can be varied where this would have an adverse impact on the historic environment, settlement pattern and/or character. As set out in **Appendix 8**, the land at White Hill, Kinver, proposed allocation is constrained by heritage designations and landscape sensitivity, as such, the minimum 120 dwelling capacity set out by Policy SA3 will likely be reduced and would not achieve the minimum density required. Comparatively, as set out in respect of Policy SA3, the Hyde Lane and Dunsley Drive sites are unconstrained and would be capable of achieving higher densities required by the policy.

Policy HC3: Affordable Housing

4.3 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy HC4: Homes for Older People

4.4 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy HC12: Space about dwellings and internal space standards

4.5 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy HC13: Parking provision

4.6 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy HC17: Open Space

4.7 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy HC19: Green Infrastructure

4.8 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy EC13: Broadband

4.9 Please refer to our previous representations made in December 2022 on this matter at **Appendix 1**.

Policy NB2: Biodiversity

- 4.10 The policy requires that professional ecological reports be provided where impacts to biodiversity are anticipated to demonstrate how the mitigation hierarchy has been applied.
- 4.11 Bellway are supportive of the policy requirement to provide *“measures to assist with halting the decline of species and to address biodiversity loss”* however this should be proportionate and reflected as such in the policy. We suggest including the wording *“proportionate measures....”*
- 4.12 The policy also includes a list of potential enhancements including bat and bird boxes, hedgehog highways and bee bricks. These should be presented as examples of measures that could be provided through development and should not act as an exclusive and closed list. Wording should be included to acknowledge that these are examples and others may be proposed to allow flexibility and ensure measures are appropriate for the type and location of development.

Policy NB6A: Net Zero New Built Residential Development (Operational Energy) AND Policy NB6C: Embodied Carbon and Waste

- 4.13 Please refer to **Appendix 10** for our representations in respect of these policies.

5. Summary

5.1 Bellway welcome the opportunity to engage with the South Staffordshire Local Plan Review Publication Plan Regulation 19 pre -submission.

5.2 Bellway have the following concerns regarding the plan, which require remedy:

- Paragraph 230 of the NPPF sets out that: *“The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre- submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements.”* Regulation 19 consultation on the Publication Plan was undertaken in November – December 2022 and therefore the Plan will be examined in accordance with the previous provisions of the NPPF. As emphasised by the Counsel Advice Note at **Appendix 6**, removing allocations from the emerging plan to align with the December 2023 NPPF does not therefore accord with this paragraph and the approach South Staffordshire have taken is fundamentally wrong in principle and in the context of the NPPF.
- There are a number of plans across the HMA intending to be submitted over the next year, ahead of the government’s likely deadline of 30 June 2025 for examination under the current system, including Dudley, Sandwell and Wolverhampton. These authorities have published draft plans with proposed allocations for regulation 18 consultation. Of note, none of the emerging plans propose to meet their own need, and as a result, they make no release of Green Belt for new homes. The NPPF, irrespective of it being the 2021 or 2023 version, sets out a requirement to comply with the duty to cooperate, which is also a legal requirement. The duty should not be used as a ‘race to the bottom’ to disregard the scale of housing need across the HMA up to 2031, which the Turley “Falling Even Shorter” report (enclosed at **Appendix 7**) demonstrates stands at 40,676 homes up to 2031. It should be used as a way to strategically plan and meet the HMA’s total needs. It is unclear how the HMA authorities will demonstrate they have met the duty to cooperate when leaving such a significant scale of unmet need unaddressed. We emphasise in this submission that all HMA authorities, including South Staffordshire, should be working together to agree how the unmet need up to 2031, as a minimum, is going to be met. This unmet need represents real people in need of a home, now. This will require difficult decisions to be made in terms of Green Belt release. The previous Publication Plan (2022) demonstrates that South Staffordshire has suitable and deliverable capacity to deliver at least 4,000 additional homes which can contribute to the GBBCHMA unmet need.
- The reduced contribution of unmet needs the Publication Plan (2024) proposes is not reflective of the functional links between South Staffordshire and the Black Country and the wider HMA. The needs of the Black Country should be met in locations as close as possible to where the need arises, as such, South Staffordshire is encouraged to revisit the contributions proposed and reengage

with the wider HMA authorities, particularly given other authorities are also not providing sufficient contributions to meet the growing unmet needs of the Black Country.

- The Publication Plan 2024 substantially decreases the number of dwellings being planned for in South Staffordshire, to meet the district's needs as well as providing a contribution to the GBBCHMA. Having regard to the Housing Market Assessment (2022) a housing need of 241 dwellings per year was established using the Standard Method, which has been updated by the Strategic Housing Market Assessment Partial Update (2024), reducing the need to 227 dwellings per year. To provide flexibility in the plan, an additional 10% buffer should be provided, increasing the need by 473 dwellings. Although the Council may assume this will be met by windfall development, to plan positively and to ensure sustainable development comes forward, additional sites should be allocated to meet this need. These sites could be drawn from the pool of omitted sites, which have been assessed as deliverable and available, for instance Hyde Lane, Kinver, which has already been considered appropriate for development having previously comprised a proposed allocation in the 2022 Publication Plan. This approach would accord with the provisions of the NPPF which sets out at paragraph 35a) that for a plan to be considered positively prepared it should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.
- For the Council to fulfil its duty to afford the 'greatest weight' to the conservation of Kinver Camp Scheduled Monument as a designated heritage asset of the highest significance, before allocating further land at White Hill, Kinver, it should first look to alternative sites at Kinver, which could come forward and deliver the same public benefits, before proceeding with the proposed allocation of a site which Historic England and the promoters themselves identify as generating 'harm' to a nationally important archaeological site. Sites such as Hyde Lane and Dunsley Drive, Kinver, are less constrained, sustainable and would be available for development early in the plan period.
- As demonstrated by the enclosed Vision Document and updated evidence base, the Hyde Lane and Dunsley Drive sites are sustainable, unconstrained, and capable of accommodating substantial growth. The sites, particularly that off Hyde Lane, would provide a positive interface between Kinver and the surrounding countryside, repairing the current exposed edge presented by the domestic gardens along the site's southwestern boundary.

5.3 We would welcome the opportunity to discuss the contents of these representations further with Officers and reserve the right to attend any future examination hearing sessions.

**Appendix 1: South Staffordshire Regulation 19
Publication Document, Statement
of Representations- December 2022**

South Staffordshire Regulation 19 Publication Document

Statement of Representations

Land off Hyde Lane (west) and land at Dunsley Drive, Kinver

Submitted on behalf of Bellway Homes Ltd

Contents

1.	Introduction	3
2.	Response to Draft Strategic Policies	6
3.	Response to Draft Development Management Policies	13
4.	Summary	17
Appendix 1: Hyde Lane, Kinver Vision Framework		19
Appendix 2: EDP Hyde Lane Heritage Technical Note		20
Appendix 3: EDP Hyde Lane Landscape Position Paper		21
Appendix 4: EDP Dunsley Drive Heritage Appraisal		22
Appendix 5: EDP Dunsley Drive Landscape Position Paper		23
Appendix 6: PJA Access Appraisal Technical Note		24
Appendix 7: Link Flood Risk Appraisal		25
Appendix 8: CSA Preliminary Ecological Appraisal		26
Appendix 9: Barton Hyett Associates / CSA Arboriculture Survey		27
Appendix 10: Turley Constraints Plan		28
Appendix 11: Turley Illustrative Masterplan		29

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Client
Bellway Homes Ltd

Our reference
BELQ3007

December 2022

1. Introduction

- 1.1 These representations are made on behalf of Bellway Homes Limited (Bellway), in response to the South Staffordshire Local Plan Review (LPR) Regulation 19 consultation.
- 1.2 Bellway welcome the opportunity to make representations on the final draft version of the Local Plan in terms of soundness and legal compliance.
- 1.3 These representations have been prepared with input from EDP on matters including heritage.

The Sites

- 1.4 Bellway is promoting two sites at Kinver:
 - Land to the west of Hyde Lane, Kinver
 - Land east of Dunsley Drive, Kinver

Land west of Hyde Lane, Kinver

- 1.5 Land west of Hyde Lane is an 8.49ha site to the north of Kinver. It represents a sustainable and deliverable residential opportunity for between 45 and 200 dwellings, alongside public open space and associated infrastructure. The site is proposed to be released from the Green Belt and allocated for a minimum 44 new homes (site 576 under draft policy SA5, where it is referred to as 'Hyde Lane (west)').
- 1.6 The draft allocation broadly reflects the most compact of the three options for development presented in the enclosed Vision Framework (**Appendix 1**). This option comprises approximately 45 dwellings with a significant area of green open space located to the east.
- 1.7 Beyond the proposed allocation, the site has greater capacity to accommodate new homes to the north, as shown in option 2 of the enclosed Vision Framework. It is therefore capable of making a greater contribution to Kinver's housing needs should it be necessary to reduce the size of the White Hill proposed allocation, or the needs of the wider District given that the anticipated delivery rates on strategic sites are ambitious (as we discuss further later).
- 1.8 Reflecting the *Spatial Housing and Infrastructure Delivery (October 2019)* consultation document, option 3 of the Vision Framework proposes a layout focused on the parts of the site least visible from the surrounding countryside, in particular along the lowest part of the site's south-western boundary either side of the ridge which runs centrally through the site's southern field. The proposed option also allows for the creation of a positive interface between Kinver and the surrounding countryside, repairing the current exposed edge presented by the domestic gardens along the site's south western boundary.
- 1.9 The following evidence base is submitted for the Hyde Lane, Kinver site:

Document	Date	Author	Appendix No.
Vision Framework	March 2021	Turley	1.
Heritage Appraisal	December 2021	EDP	2.
Landscape Position Paper	December 2021	EDP	3.

Land east of Dunsley Drive, Kinver

- 1.10 Land east of Dunsley Drive has also been promoted through the Local Plan Review. It represents a sustainable and deliverable residential opportunity for up to 36 new homes, and public open space and associated infrastructure.
- 1.11 This site was proposed by the *LPR preferred options paper (November 2021)* to be released from the Green Belt and allocated for a minimum 22 new homes (site 272 under draft policy SA5), however, the site is no longer an allocation within the publication version of the Plan. Notwithstanding this, it remains a suitable and deliverable option to meet Kinver and South Staffordshire's wider housing needs, as we discuss further at section 2 of these representations.
- 1.12 We first made representations promoting the site to the call for sites in 2017 (SHLAA ref: 272). Since then the site has been promoted through the different stages of the plan and is supported by a comprehensive evidence base, as summarised below:

Document	Date	Author	Appendix No.
Heritage Appraisal	December 2019	EDP	4.
Landscape Position Paper	December 2019	EDP	5.
Access Appraisal Technical Note	March 2022	PJA	6.
Flood Risk Appraisal	January 2022	Link	7.
Preliminary Ecological Appraisal	December 2021	CSA	8.
Arboriculture Survey	March 2021	Barton Hyett Associates / CSA	9.
Constraints Plan	March 2022	Turley	10.
Illustrative Masterplan	March 2022	Turley	11.

Bellway Homes

- 1.13 Evolving from a local family business to a FTSE 250 major PLC, Bellway builds exceptional quality new homes throughout the UK, delivering almost 11,000 new

homes across the UK in the last year. They are an established five star housebuilder as a result of their emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

- 1.14 Bellway, with their consultant team, have and will continue to seek to work closely with the Council, statutory consultees and other stakeholders through the development plan process, and as the housebuilder for the site with a strong track record for delivery, will ensure careful attention is given to viability and costs in plan-making.
- 1.15 Bellway welcome the opportunity to further engage with the LPR through the Regulation 19 consultation. We respond to the Publication Plan at **Section 2** of these representations and provide a summary at **Section 3**. The statement provides further context to responses set out in the consultation forms which are also submitted on behalf of Bellway Homes.

Support for the Plan

- 1.16 Bellway support the inclusion of the land west of Hyde Lane and its form as proposed in the draft plan, including the provision of green infrastructure to the east, which will enable the delivery of significant biodiversity enhancements and Green Belt compensatory improvements.
- 1.17 Bellway do however have concerns regarding the anticipated delivery rates for Cross Green (though do not disagree with its principle) and the principle of the proposed allocation on land south of White Hill, Kinver given the impact this will have on heritage assets in the vicinity of the site. The plan should anticipate less delivery from both sites before 2039 to de-risk the plan and to remedy this identify land elsewhere to ensure the District's needs are met in full, including additional land to the north of the proposed land west of Hyde Lane, Kinver allocation, or if necessary re-allocation of land at Dunsley Drive, Kinver.

2. Response to Draft Strategic Policies

Cross boundary issues and the duty to cooperate, and Strategic Objectives

- 2.1 It is welcomed that the LPR acknowledges from the outset and at paragraph 3.6-3.7, the opportunities section of Table 2 SWOT analysis, and the strategic objectives, and a theme throughout the plan, that unmet housing needs from the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is a 'key cross boundary issue' to be addressed through the plan.
- 2.2 Bellway support the vision and strategic objectives set out. Strategic Objective 2 in particular references the need to meet the housing and employment needs of the District whilst making a proportionate contribution towards the unmet needs of the GBBCHMA.
- 2.3 The objectives for high quality housing to meet a wide range of needs and provide beautiful and sustainable places where people want to live are welcomed. The LPR notes the lack of brownfield development sites available within the District, and the requirement for a careful release of suitable Green Belt land to meet housing need.
- 2.4 The strategic objectives of the LPR are sound.

Policy DS1: Green Belt

- 2.5 Whilst we have no in principle concern with draft policy DS1, the LPR should be drafted as though it is being read once the plan is adopted. The fifth paragraph may therefore need amendment to reflect that the Green Belt boundaries have already been altered, rather than 'will be'.
- 2.6 We would recommend the following modification at draft policy DS1 paragraph 5 to reflect this:

*"The Green Belt boundary ~~will be~~ **has been** altered through this Plan to accommodate development allocations set out in Policies SA1, SA2, SA3, SA5 and SA7" ...*

Policy DS2: Green Belt Compensatory Improvements

- 2.7 NPPF paragraph 142 states that the removal of land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. Planning practice guidance clarifies that this could include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity and habitats, new or enhanced walking and cycling routes, and improved access to new or existing recreational and playing field provision.
- 2.8 Policy DS2 reflects this approach and provides sufficient flexibility to agree a contribution if no specific scheme can be identified.

- 2.9 Bellway intend to engage with Kinver Parish Council to agree a suitable compensatory scheme for the land identified as part of the Hyde Lane (west) proposed allocation.

Policy DS4: Development Needs

- 2.10 The development needs of South Staffordshire include a proportion of the unmet housing need of the GBBCHMA. The GBBCHMA is made up of 14 different authorities, including Birmingham and the four Black Country authorities. There is no question that there is a significant unmet need arising from the GBBCHMA:

- There is a remaining unmet need of **6,302 homes up to 2031** from the adopted Birmingham Development Plan (January 2017), as per the *GBBCHMA fourth position statement addendum (December 2021)*.
- Based on their own assumptions the Black Country has an unmet need of **36,819 homes up to 2039** (the Black Country Urban Capacity Review Update (May 2021)). The previous draft of the Black Country Plan proposed allocations to reduce this to circa 28,000 homes, however the plan has now been abandoned and each authority will be preparing its own plan.
- Birmingham has now commenced a review of its plan. The Issues and Options version is currently published for consultation – that indicates there is a substantial shortfall from the city of circa **78,000 homes up to 2042**.

- 2.11 Given the significant remaining shortfall arising in the GBBCHMA and South Staffordshire's clear functional relationship with the wider HMA (demonstrated by its travel to work patterns, and transport links with Birmingham and the Black Country), Bellway are therefore supportive of the plan's proposed contribution to the GBBCHMA's unmet need. The scale of the contribution and the Council's approach is justified by the *Greater Birmingham and Black Country Strategic Growth Study (February 2018)*.

- 2.12 Nearly all of South Staffordshire's villages are surrounded by Green Belt, therefore it is inevitable that the District will need to release Green Belt to meet its needs and those of the wider GBBCHMA. As such exceptional circumstances have been clearly demonstrated to alter Green Belt boundaries through the draft plan, in accordance with NPPF paragraph 140.

- 2.13 The ongoing work with neighbouring authorities to agree the contribution to the shortfall is well evidenced, as such the Council has satisfied the duty to cooperate.

- 2.14 The approach to making a contribution to the wider GBBCHMA unmet needs is therefore positively prepared, based on effective joint working, and is consistent with national policy.

Policy DS5: The Spatial Strategy to 2039

- 2.15 The policy sets out that growth will be directed towards the most accessible and sustainable locations, whilst also ensuring that the natural and historic environment is maintained and enhanced to protect local distinctiveness.

- 2.16 Kinver is identified as a 'Tier 2 Settlement' within the policy. The village benefits from several bus services providing routes to Kidderminster, Stourbridge, Hagley, Wolverhampton and some local routes. These settlements also include a number of train stations providing regional, as well as national connections. Stourbridge Junction station is the nearest, located approximately 7km to the east of Kinver. This station provides direct and regular rail services to Birmingham, Kidderminster, Solihull and London.
- 2.17 As such, there are options available to reduce car use for residents. The village also benefits from a range of local facilities, for instance, a infants, primary and secondary school, public houses and restaurants, shops and services, including a GP and dental surgery, further limiting the need for residents to travel for their day to day needs. On this basis, Kinver is considered to be a highly sustainable and accessible 'Tier 2 Village'.
- 2.18 Bellway do however have some concerns regarding the spatial strategy's reliance on land at Cross Green, which we comment on in response to draft policy SA2. There are also concerns regarding the locations of where growth in Kinver is proposed, which we comment on in response to draft policy SA5.

Policy SA2: Cross Green

- 2.19 We have no objection in principle to the proposed allocation at Cross Green, however we have some concerns regarding the scale of delivery anticipated for the proposed plan period given infrastructure delivery.
- 2.20 Firstly, there are concerns regarding the access road to ROF Featherstone and the associate costs and the potential impacts on Cross Green's viability and delivery trajectory. The IDP now estimates the cost of delivering the access road at £14.4m-£19m, to be funded via Staffordshire County Council and developer contributions. Evidence should be provided as to how this will be funded. The only funding evidence to date is reference to £1.5m of Growth Deal funding being made available via the Stoke-on-Trent and Staffordshire Local Enterprise Partnership.
- 2.21 Secondly, mindful of the scale of infrastructure delivery at the site, no detailed evidence has been provided to support the site's proposed quantum of housing growth (1,200 new homes).
- 2.22 With the expectation set out in the LDS that the plan will be adopted in December 2023, it is assumed an application will be submitted by summer 2024, at the earliest. *Lichfields' Start to Finish report (February 2020)* identifies that the average lead in time for applications of Cross Green's scale from validation of an application to first delivery is **8.4 years**. This would see the first completion in **winter 2033**.
- 2.23 The Lichfield's report indicates it is reasonable to assume 160 dwellings per annum (dpa) to be delivered on sites of Cross Green's scale. This is qualified by *Stafford Borough's Lead-in Times and Built Rate Assumptions Topic Paper (October 2022)*, which provides evidence for lead in times for sites in Stafford's neighbouring authorities. Stafford's only neighbouring authority to provide evidence to the topic paper for sites of 501 homes or more, Lichfield District (who are also a neighbour to South

Staffordshire), indicate it is reasonable to assume a ceiling of 150dpa on sites of that scale.

2.24 Based on the above assumptions the below delivery is anticipated:

2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	Total
40	160	160	160	160	160	160	1,000

2.25 In total, it is therefore assumed that Cross Green will only deliver **around 1,000 new homes** before the end of the plan period, 200 less than the policy assumes.

2.26 The Council should therefore consider preparing further evidence to justify the scale of growth proposed for Cross Green, or if this is not possible reduce the anticipated delivery before 2039 to 1,200 homes and identify other sustainable locations for this growth to be delivered elsewhere in the District (such as additional land available at the land off Hyde Lane (west) and Dunsley Drive, both at Kinver).

2.27 If the delivery rates cannot be evidenced than the following modification to draft policy SA2 at part a) will be necessary:

2.28 “a) A minimum of ~~1,200~~ **1,000** homes”

Policy SA5: Housing Allocations

Land off Hyde Lane (west) (Housing Allocation 576)

2.29 We continue to support the principle of the proposed release of land at Hyde Lane (west) from the Green Belt and allocation for housing growth. The Council’s evidence base is clear it performs better than other options at Kinver.

2.30 The southern and western edges of Kinver are significantly constrained by the Canal Conservation Area; Kinver Hillfort scheduled ancient monument and the Rock houses, as well as Flood Zones 2 and 3. Land to the north west is constrained by highway capacity and access. In this context, land west of Hyde Lane (as well as land to the east of Dunsley Drive) represents a sustainable location for accommodating future growth in Kinver village.

2.31 The increase in the minimum housing allocation to 44 homes and the associated amended allocation boundary is welcomed, it reflects Option 3 of the Vision Document.

2.32 Bellway also support the provision of green infrastructure to the east, which will allow the provision of new open space, biodiversity enhancements and Green Belt compensatory improvements.

2.33 Elsewhere we have raised concerns regarding the scale of delivery at the proposed Cross Green site and land south of White Hill. As demonstrated by the enclosed Vision Framework (**Appendix 1**), the Hyde Lane site is capable of accommodating a greater scale of growth on the land available to the north of the currently proposed allocation.

The evidence demonstrates the land to the north of the Hyde Lane allocation is a sustainable location for growth with no constraints which cannot be overcome. The evidence base assesses it as having the same impacts as the majority of other proposed allocations in the plan, including those within Kinver:

- The *Strategic Housing and Employment Land Availability Assessment (SEHLAA) (2022)* identifies the site as potentially suitable
- The *LUC Landscape Study (2019)* identifies the site as being of ‘moderate-high’ landscape sensitivity
- The *LUC Green Belt Review (2019)* identifies that the loss of the site would represent ‘moderate’ Green Belt harm

- 2.34 It would provide a similar response to the proposed Hyde Lane allocation, creating a positive interface between Kinver and the surrounding countryside, repairing the current exposed edge presented by the domestic gardens along the site’s south western boundary, a significant benefit acknowledged by Kinver Parish Council in the minutes of their meeting held on 14 December 2022. It would also deliver a significant benefit by increasing the area of Green Infrastructure proposed as part of the Hyde Lane (west) allocation, as shown in option 2 of the Vision Framework (**Appendix 1**).

Land south of White Hill (Housing Allocation 274)

- 2.35 Bellway has concerns regarding the likely impacts of developing this site.
- 2.36 As demonstrated by the *EDP Heritage and Landscape Technical Note* enclosed at **Appendix 2**, in terms of heritage impact, although the site’s ‘less than substantial harm’ to the Kinver Camp Scheduled Monument is not an in-principle issue, NPPF paragraph 199 requires the Council to afford the ‘greatest weight’ to the conservation of the monument as a designated heritage asset of the highest significance. NPPF paragraph 200 states that ‘clear and convincing’ justification should be provided for that harm, public benefits notwithstanding. There are other sites available in Kinver such as the additional land to the north of the Hyde Lane proposed allocation or the de-allocated Dunsley Drive site which do not result in this level of harm and should therefore be preferable in the site selection process.
- 2.37 In landscape terms, EDP’s note states that to accord with the local planning authority’s evidence base and the prevailing landscape and visual character of the site, the extent of residential development currently illustrated is deemed to be unacceptable. It is considered to represent an over-estimation of the site’s development capacity in landscape and visual terms. The design response to the Staffordshire Way would result in a major permanent and irreversible adverse effect, a point reiterated in Kinver Parish Council’s minutes of the meeting held on 14 December 2022. The development proposals do not provide a sufficient off-set space to the western boundary, which includes trees subject to Tree Preservation Orders. It should also include a far stronger link north south to link the phases together.
- 2.38 The Council should therefore carefully consider alternative sites at Kinver such as Bellway’s additional land at Hyde Lane (west) discussed above and land east of Dunsley

Drive discussed below which could come forward and deliver the same public benefits (in terms of delivering much needed housing) with less harm to designated heritage assets and which will provide a better landscape and visual response.

Land east of Dunsley Drive (Omitted site)

- 2.39 Land east of Dunsley Drive was initially included proposed to be removed from the Green Belt and allocated for development up to an including the Preferred Options stage of the Local Plan Review, as housing site allocation 272 (Figure 2).
- 2.40 The allocation was for a minimum of 22 dwellings on a site featuring good access and a natural extension to Kinver. The *2021 Housing Site Selection Topic Paper* stated that, unlike some of the other potential Green Belt sites around Kinver, the Dunsley Drive site is free from 'significant constraints' (e.g. Highways Authority concerns, potentially significant impact upon the historic environment). Paragraph 5.7.8 noted that 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.
- 2.41 The November *2022 Housing Site Selection Topic Paper* discounts the site from the proposed housing allocations. The reasoning provided for this is the *Stage 2 Historic Environment Site Assessment (HESA) (2022)*, which revised the scoring of the site from Green to Red. The basis of this is the predicted impact of development on the contribution that the site makes to the significance of the Kinver Conservation Area. The *HESA* states that development on the site would **not in itself compromise the cultural heritage value of the overall Conservation Area** to the extent that the values that led to its designation would be diminished. The Assessment contends however, that it would inevitably compromise the setting of the small character zone within the Conservation Area that is defined by Dunsley House and its hilltop position, as well as the setting of the non-designated asset itself. The *HESA* states that mitigation is unlikely to be possible and therefore a high (red) impact is predicted.
- 2.42 Nevertheless, the *HESA* also concludes that:
- “The predicted level of effect upon both the setting of the non-designated house and the character of the Dunsley component of the Conservation Area would not be of such a level as to constitute ‘Substantial Harm’ in terms of the NPPF.”*
- 2.43 The site does adjoin the Conservation Area in the far east (where it extends to include Dunsley House – a ‘positive’ building within the Conservation Area). The site does form part of Dunsley House’s setting, however in the context of the Conservation Area as a whole, its contribution to Dunsley House’s significance (the Conservation Area’s special interest) is likely to be very small and so the ‘harm’ arising from its development would also be ‘very small’. In terms of the NPPF this harm would, at worst, be less than substantial harm towards the lowest end of that broad spectrum.
- 2.44 Beyond heritage, Dunsley Drive scores similar to other proposed allocations at Kinver:
- The Strategic Housing and Employment Land Availability Assessment (SEHLAA) (2022) identifies the site as potentially suitable

- The *LUC Landscape Study (2019)* identifies the site as being of ‘moderate-high’ landscape sensitivity
- The *LUC Green Belt Review (2019)* identifies that the loss of the site would represent ‘moderate’ Green Belt harm

2.45 The evidence base enclosed with these representations also demonstrates the site is not subject to any constraints which cannot be overcome. As such the evidence base does not justify the omission of land east of Dunsley Drive as a proposed allocation.

2.46 Policy SA5 should therefore be modified to reduce the capacity of land south of White Hill or delete it completely, to reflect its constraints (in particular heritage) and the additional land north of the proposed Hyde Lane allocation and / or the omitted Dunsley Drive site should be added into the policy for a minimum capacity of around 40 homes each.

3. Response to Draft Development Management Policies

Policy HC1: Housing Mix

- 3.1 Bellway support the core principle of these policies, to create ‘mixed, sustainable and inclusive communities’. However, the prescriptive minimum housing requirements may risk providing the wrong type of housing for Kinver residents and potentially impact on development viability and delivery.
- 3.2 As such, the policy should be reconsidered to ensure it accords with paragraph 82 of the NPPF and the need for policies to “*be flexible enough to accommodate needs not anticipated in the plan*” and to “*enable a rapid response to changes in economic circumstances.*”
- 3.3 The policy should take a more flexible approach on housing mix to ensure it is consistent with NPPF paragraph 82’s need for policies to “*be flexible enough to accommodate needs not anticipated in the plan*” and to “*enable a rapid response to changes in economic circumstances.*” It also needs to recognise that housing needs vary within different areas and on a site-by-site basis. The policy must ensure that the viability of development proposals is protected whilst providing an appropriate housing mix for the site location and local market. In addition to evidence such as the latest Housing Market Assessment, it would be appropriate for the Council to refer to other evidence including current demand.
- 3.4 We would recommend the following modifications to the third paragraph of policy HC1 to ensure it is consistent with NPPF paragraph 82:

*“On major development housing sites (excluding sites exclusively provided for self-build or custom housebuilding), the market housing ~~must~~ **should** include a minimum of 70% of properties with 3 bedrooms or less, with the specific mix breakdown to be determined on a site-by-site basis and reflective of need identified in the council’s latest Housing Market Assessment, **unless evidence is submitted to demonstrate otherwise**”.*

Policy HC3: Affordable Housing

- 3.5 The latest *Housing Market Assessment Update (2022)* identifies a net affordable housing need of between 67 dpa and 156 dpa, dependent on the proportion of household income used spent on housing costs. The *Viability Study (2022)* clearly highlights the challenges in delivering the 30% affordable housing requirement, and highlights that without higher sales values the sites would not necessarily be viable. As such, affordable housing policy should take full account of all evidence in terms of both affordable housing need and viability, and ensure that sufficient flexibility remains.
- 3.6 PPG states that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. The NPPF states that planning policies should expect at least 10% of the total number of homes to be available for affordable home ownership. The proposed policy is consistent with these requirements.

- 3.7 However, in relation to affordable housing tenure, existing Core Strategy policy H2 states that the precise proportion of affordable housing tenure split will be agreed with the Council *“having regard to local housing needs within the locality of the development, exceptional circumstances and the effects on the viability of a scheme.”*
- 3.8 The proposed policy should be less prescriptive in terms of tenure mix, to allow sites to best respond to current housing needs with a location and site-specific approach. Impact on scheme viability is referenced in the existing policy H2, and there should also be an allowance for a consideration of site viability, including whether there is a need for new infrastructure etc. which could impact on delivery of the allocated sites. The proposed tenure split for affordable housing is broadly in line with the need evidenced in the *Housing Market Assessment Update 2022*. However, this may change over time and location-specific flexibility should be provided.

Policy HC4: Homes for older people and others with special housing requirements

- 3.9 Bellway support the provision of accessible homes that are suitable to meet the needs of older people and others with special housing requirements. However, if the Council is to adopt the higher optional standards within the Building Regulations (Part M4(2) Category 2) for accessible and adaptable homes, it should only do so by applying the criteria set out in PPG.
- 3.10 The PPG identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The Council should provide localised evidence making the specific case for South Staffordshire which justifies the inclusion of **optional** higher standards for accessible and adaptable homes in this policy. If the Council can provide the appropriate evidence and this policy is to be included, then Bellway would support a transition period included within the policy, as appropriate.
- 3.11 The Council should also note that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
- 3.12 There is a need for policy to be consistent with national standards unless a specific evidenced reason exists for a higher standard to be applied in South Staffordshire.

Policy HC12: Space about dwellings and internal space

- 3.13 The requirement to meet the Nationally Described Space Standard is considered reasonable. External space standards and amenity spaces should not be explicitly stated within the policy. Whilst there are caveats contained within which state an allowance for flexibility *“depending upon the site orientation and the individual merits of the development proposal”*, planning judgement on a case-by-case basis with reference to the distance/size criteria as guidance rather than policy would suffice to achieve suitable quality residential environments. It must be ensured that specific

criteria do not result in 'planning by numbers' and an unintentional lack of flexibility in assessing future planning applications.

Policy HC13: Parking Provision

- 3.14 Part (e) of the Policy references Appendix I of the Plan which sets out parking standards, in relation to electric vehicles. Bellway support the Council's endeavours to encourage electric vehicle uptake.
- 3.15 Part S of the Building Regulations 'Infrastructure for the charging of electric vehicles' has now taken effect and provides guidance on the installation and location of electric vehicle charge points (EVCPs). It states that a new residential building with associated parking must have access to EVCPs and that their total number must be equal to the number of parking spaces if there are fewer parking spaces than dwellings, or the equal to the number of dwellings where there are more parking spaces. The Regulations also set technical requirements for the charging points these include having a nominal output of 7kW and being fitted with a universal socket.
- 3.16 The policy should avoid repeating electric vehicle requirements which are otherwise secured through Building Regulations and which may risk a lack of accordance with the Regulations should requirements change during the lifetime of the Plan.

Policy HC17: Open Space

- 3.17 The approach of this policy is welcomed, which provides flexibility in terms of the location of any open space – to respond to a site's characteristics to ensure any development maximises recreational use. This is a more appropriate approach than being specific about the potential location of open space, as had been previously proposed by the preferred options consultation.

Policy HC19: Green Infrastructure

- 3.18 The policy will require that all development proposals maximise on-site green infrastructure. The aim of the policy and for the maximisation of on-site green infrastructure is to enhance biodiversity, improve connectivity to existing habitats and enhance the quality of the area for the benefit of residents.
- 3.19 An enhancement in the provision of green infrastructure can be achieved on both sites with buffers to the Green Belt to the north and west.
- 3.20 Whilst the broad themes of the policy are understood and achievable, the policy is not clear on whether this requirement will be triggered where sites are also providing compensatory green infrastructure on sites which have been taken out of the Green Belt. There is uncertainty over whether green infrastructure requirements can be combined with the compensatory measures and be provided off site. This should be clarified within the policy or supporting text.
- 3.21 In this regard, there is a need for the policy wording to be revised to ensure that it is unambiguous (as required by NPPF paragraph 16) so that it is evident how a decision maker should react to development proposals.

Policy NB6: Sustainable Construction

- 3.22 The proposed policy approach represents repetition of the 2021 Part L Interim Uplift and the Future Homes Standard. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard negate any need for local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.
- 3.23 The policy states that all residential schemes must also show compliance with a water efficiency standard of 110 litres/person/day. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person. The higher standard proposed within the draft policy has not been justified in accordance with the standard required by the NPPF. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, it should justify doing so by applying the criteria set out in the PPG.
- 3.24 Given the above the policy does not serve a clear purpose. Whilst the policy will require the calculation of the whole life cycle carbon emissions and actions to reduce life cycle carbon emissions, it is not clear how determination will be made as to what is an appropriate level of emissions or reductions. There are also concerns in relation to the elements of the policy regarding performance and monitoring. It is not clear what the Council would do with the information in relation to performance information or the monitoring information once the development is completed.
- 3.25 For the above reasons the policy is not considered to be justified and should be deleted.

EC13: Broadband

- 3.26 Bellway will work to provide modern and future-proof infrastructure provision within sites to be delivered, including broadband connectivity. This reflects Bellway's ambition to provide contemporary, attractive places to live which provide a high-level of connectivity.

4. Summary

- 4.1 Bellway welcome the opportunity to engage with the South Staffordshire Local Plan Review (LPR) publication plan regulation 19 consultation.
- 4.2 Bellway are broadly supportive of the publication plan, in particular the overall housing need, the contribution to the Greater Birmingham and Black Country Housing Market Area which is completely justified, and the proposed allocation of land off Hyde Lane (west) (housing allocation 576), supported by the plan's evidence base.
- 4.3 Bellway however have the following concerns regarding the plan, which may require remedy:
- Whilst not objecting to principle of Cross Green, **the proposed delivery trajectory is ambitious based on lead in times for significant infrastructure.** On this basis the Council should consider whether further evidence can be provided to justify the scale of growth proposed for Cross Green, or if not then its anticipated delivery before 2039 should be reduced and the associated growth delivered elsewhere in the district, such as Bellway's additional land to the north of Hyde Lane (west) or land east of Dunsley Drive.
 - **For the Council to fulfil its duty to afford the 'greatest weight' to the conservation of Kinver Camp Scheduled Monument as a designated heritage asset of the highest significance, before allocating further land at White Hill, Kinver, it should first look to alternative sites at Kinver,** which could come forward and deliver the same public benefits, before proceeding with the proposed allocation of a site which Historic England and the promoters themselves identify as generating 'harm' to a nationally important archaeological site.
 - As demonstrated by the enclosed vision document, **the Hyde Lane site is capable of accommodating a greater scale of growth on the land to the north of the currently proposed allocation.** The evidence demonstrates the land to the north of the Hyde Lane allocation is a sustainable location for growth with no constraints which cannot be overcome. Indeed it would provide a similar response to the proposed Hyde Lane allocation, creating a positive interface between Kinver and the surrounding countryside, repairing the current exposed edge presented by the domestic gardens along the site's south western boundary.
 - The **evidence base does not justify the omission of land east of Dunsley Drive** as a proposed allocation. Any harm to the Kinver Conservation Area would be, at worst, less than substantial harm towards the lowest end of that broad spectrum. The site represents similar impacts in terms of landscape sensitivity and Green Belt harm as other proposed allocations in the plan. The site is therefore capable of meeting any residual housing need in the event the anticipated delivery for Cross Green before 2039 is reduced or land at White Hill has to be removed from the plan.

- Other policies, outlined in Section 3 of this statement, are overly prescriptive and therefore not consistent with national policy in terms of ensuring that the policies are sufficiently flexible to meet changing requirements.

4.4 We would welcome the opportunity to discuss the contents of these representations further with officers and reserve the right to attend any future examination hearing sessions.

Appendix 1: Hyde Lane, Kinver Vision Framework

Hyde Lane, Kinver

Vision Framework

Prepared on behalf of Bellway Homes Ltd.

March 2021

On behalf of
Bellway

Prepared by
Turley

Introduction

This Vision Framework document has been prepared on behalf of the Bellway Homes Ltd (Bellway) in response to the growing housing requirements of Kinver and the wider area. It also supports the need for South Staffordshire Council to plan strategically for sustainable housing growth to help meet the needs of future generations.

It seeks to demonstrate that land at Hyde Lane, Kinver is a suitable, sustainable and deliverable site for future development and is the most logical location for future housing.

This document presents three separate options for development at the site and is intended to be flexible, so it can respond to the requirements of the emerging South Staffordshire Local Plan Review. All three options represent landscape-led proposals which reflect the site's characteristics and the surrounding context.



The site

The site is located on the northern edge of Kinver, South Staffordshire. Defined by Hyde Lane to the east, an existing hedgerow to the north, and residential properties bounding Cedar Gardens, Hillboro Rise and Hyde Close to the south and west, the site comprises of 8.5 Ha of land currently used for agricultural purposes.

Beyond the sites immediate boundaries, the village of Kinver extends outwards both south and west of the site with open farmland extending outwards to the north and east.

The site is well defined and contained by its existing boundaries and is not known to contain and inhibitive constraints which would limit its future development potential.



Site
aerial
photograph

Bellway

At Bellway our aim is not just to build new houses, it is to create attractive and sustainable communities that leave a positive legacy for residents and the wider society. Our commitment to this is demonstrated by being awarded the coveted five star housebuilder award by the House Builders Federation as a result of emphasis on build quality, customer care and health and safety.

Bellway recognise that successful developments must meet the needs of not just potential residents, but also of existing neighbouring communities. We therefore consult on new developments through tailored engagement with local communities and stakeholders, incorporating feedback into our plans to ensure local people have the opportunity to help shape developments within their community.

As the fourth largest housebuilder in the UK, Bellway are well placed to deliver much needed market and affordable homes to address the country's ongoing housing shortage. Since our beginning as a family business over 70 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables our divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are well-suited to the local area.

Bellway are promoting this highly sustainable Site in Kinver for the delivery of much needed market and affordable homes, and we are fully committed to working with the Council and the community to make this happen.



The team

This document has been prepared in collaboration with an experienced range of specialist consultants to ensure the proposals represent the highest quality development that is most suitable for the site and its surrounding context.

The consultant team instructed to advise as part of this project is as follows:

Turley

Turley

Planning and urban design



PHIL JONES ASSOCIATES
transport planning consultants

Phil Jones Associates

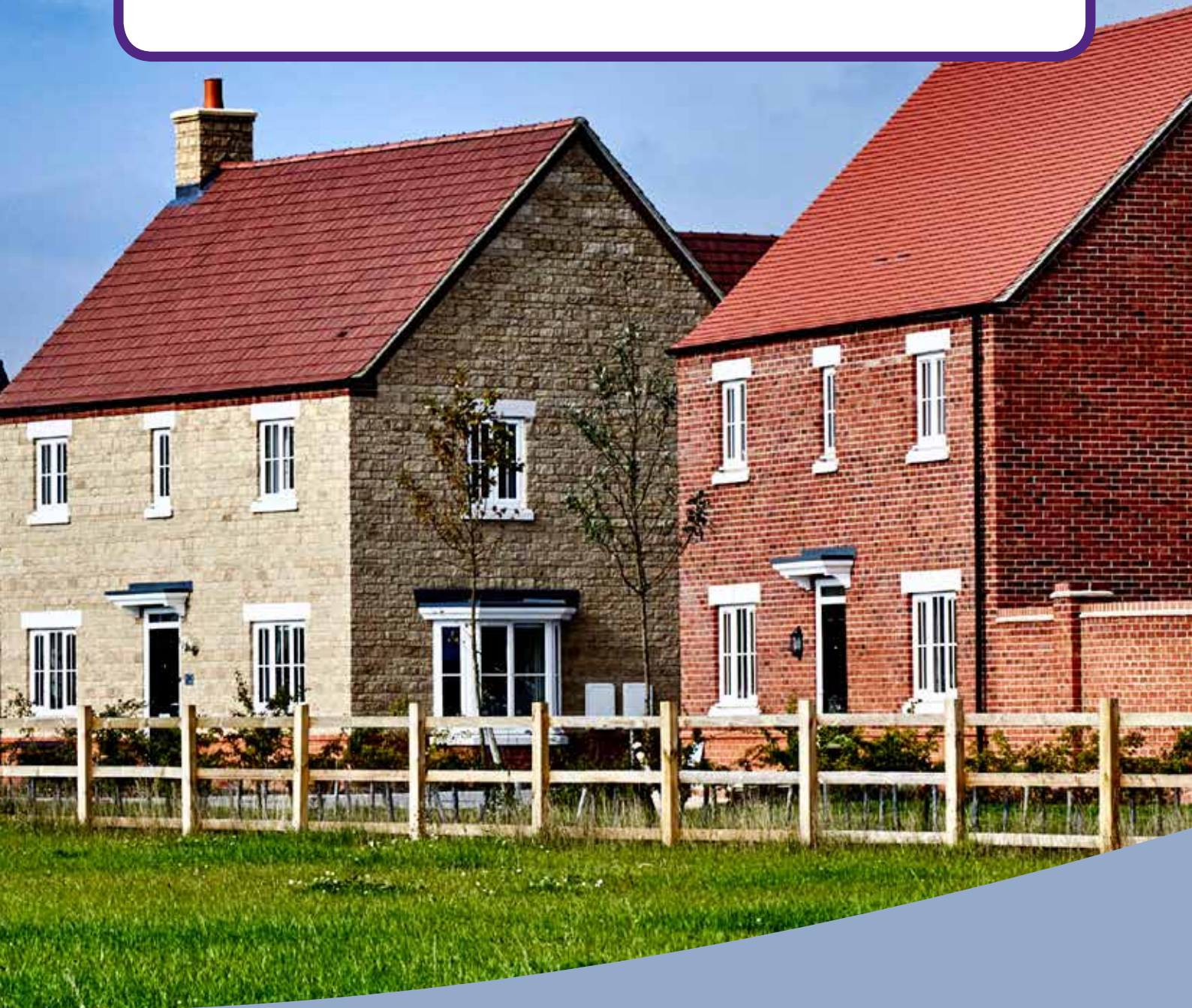
Highways and drainage



edp | the environmental
dimension partnership

edp

Heritage and landscape

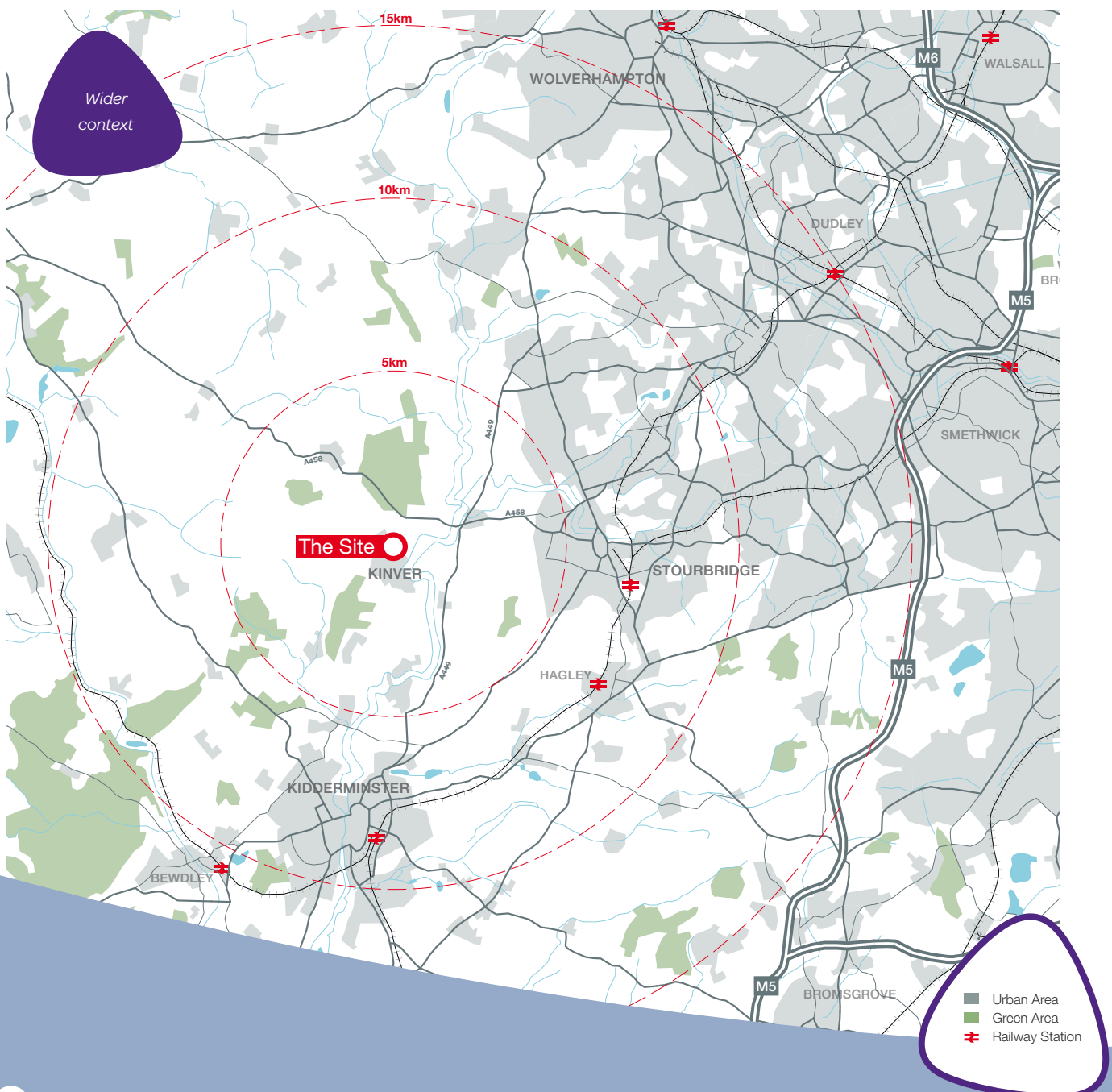


Strategic context

Kinver is a key service village of nearly 7,500 residents located to the west of Stourbridge. A historic rural settlement, the village is popular with commuters and families alike and hosts a range of service such as schools, doctors and a vibrant high street.

Located along the A449, Kinver has good connections with Stourbridge to the east and Kidderminster to the south. The local road network links the site to the M5, approximately 20 km to the east (a 30 minutes drive) and provides good connections to surrounding urban centres such as Birmingham, Wolverhampton and with wider Greater Birmingham and Black Country areas.

With regard to public transport, a number of bus services provide regular connections to the surrounding settlements of Stourbridge, Hagley, Kidderminster and Wolverhampton. These settlements also include a number of train stations providing regional, as well as national connections, with Stourbridge Town and Stourbridge Junction stations being the nearest, located approximately 9 km to the east (16 minute car drive) from Kinver. These stations provide direct and regular rail services to Birmingham, Kidderminster, Solihull and London.



Immediate context

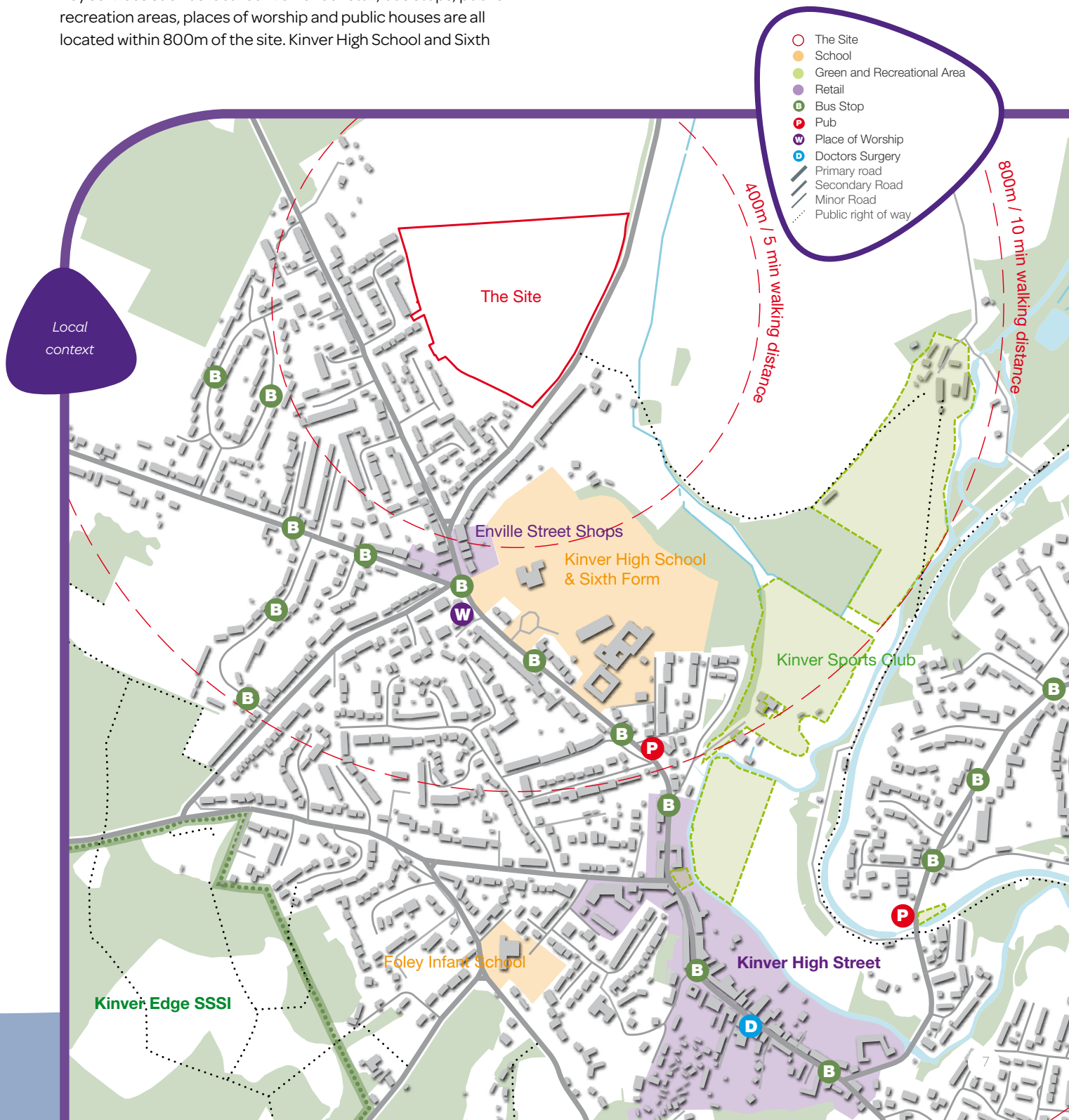
The site is located along the northern edge of Kinver adjacent to a number of residential streets.

Kinver has been identified within local planning policy as a Main Service Village which serves the needs of the wider area and hosts a range of high quality services which are key to supporting future residential growth.

Key services such as local convenience retail, bus stops, public recreation areas, places of worship and public houses are all located within 800m of the site. Kinver High School and Sixth

Form, the main secondary school which serves both Kinver and the surrounding area is also located less than 800m from the site.

Beyond but still within a short walk of the site is Foyle Infant School as well as Kinver High Street which plays host to a range of key local services including a doctors surgery, pharmacy and dentist, a library community hall as well as a number of leisure uses.



The strategic choice for housing

The Council has commenced preparation of its Local Plan Review and the associated evidence base. As part of the review the Council published its Spatial Housing Strategy and Infrastructure Delivery paper in October 2019 for consultation. That paper identified the Council's preferred spatial strategy for meeting the district's housing needs, as well as a contribution to the neighbouring emerging Black Country Plan's housing shortfall, includes delivering at least 35 dwellings in Kinver on land not currently allocated or safeguarded in an adopted plan.

The plan is supported by an extensive evidence base, including a Green Belt Review (DATE). This demonstrates that development at the site would have a moderate impact on the Green Belt given the absence of a strong settlement edge and the presence of woodland blocks which contain the land, limiting impact on the wider Green Belt, reducing harm.

Going forward the Council intends to publish the preferred options paper for consultation in July 2021, before publishing its publication plan in July 2022 and then submitting it for examination in December 2022. The Council anticipates adopting the plan in December 2023.

Planning constraints

The site represents the most sustainable location for growth at Kinver. It is located wholly within Flood Zone 1, representing a low risk of flooding (less than 0.1%/1 in 1,000 years). There are no heritage assets located within or adjacent to the site. The Kinver Camp scheduled monument is 1.1km to the south and the edge of the Kinver Conservation Area is 550m to the south of the site at its nearest point. Furthermore, the site is not constrained by any environmental designations, such as Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas or Ramsar sites.

It will be accessed from Hyde Lane, a principal 6m wide single carriageway, which connects Kinver with the A458 (Bridgnorth Road) towards Stourbridge and Kidderminster via the A449. There is an opportunity to extend the existing footway to provide pedestrian access to the site.

Beyond land to the west of Hyde Lane, there are limited opportunities for growth around Kinver. The southern and western edges of the village are significantly constrained by the Canal Conservation Areas and Kinver Camp scheduled monument. Land to the east and south east is dominated by Kinver Edge (which contains the Kinver Hillfort) and forms part of the Merican Forest. Land to the north west is constrained by accessibility, given White Lane comprises a narrow carriageway 4.5m in width and the unconventional layout of the junction between White Hill, Meddins Lane and Enville Road which is prone to on street parking.

There are also large areas to the south east of Kinver which are within Flood Zones 2 and 3 and so unsuitable for residential development.

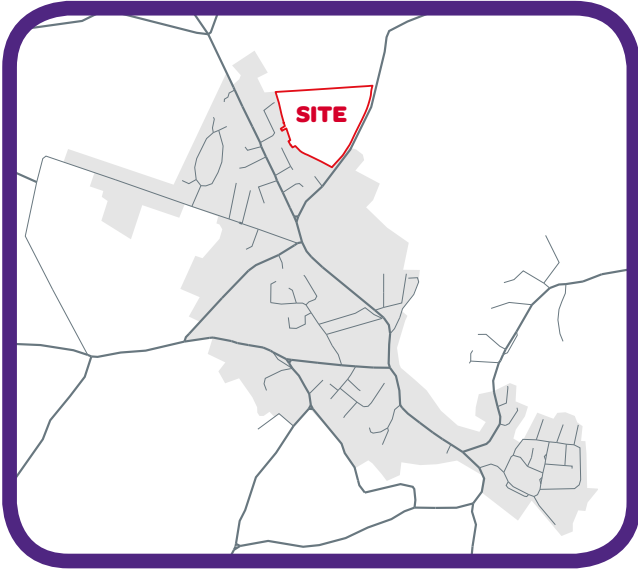
The plan below demonstrates the nature of Kinver and that land to the west of Hyde Lane represents the most sustainable location for housing growth.

Ideal for future development

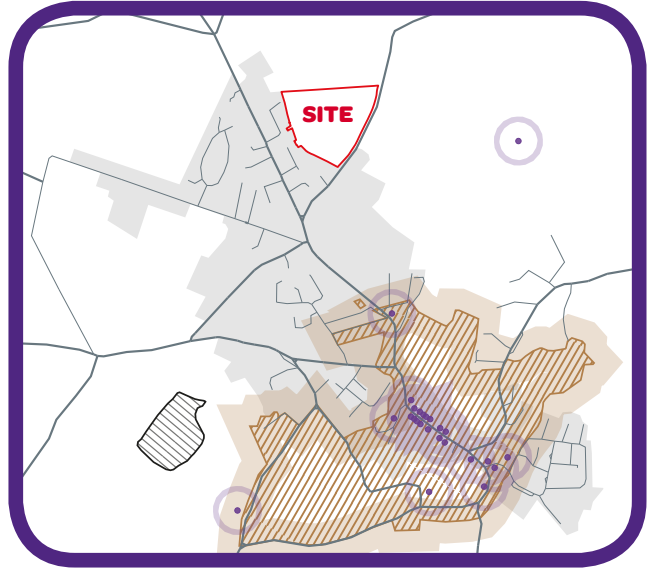
The constraints plans opposite clearly demonstrate how the site is ideally located for future housing growth:

- away from any heritage constraints including listed buildings and conservation areas
- away from any landscape constraints including the Kinver Edge SSSI
- outside any areas identified at risk of flooding or allocated flood plain, and
- along a route (Hyde Lane) which is capable of handling additional traffic needs.

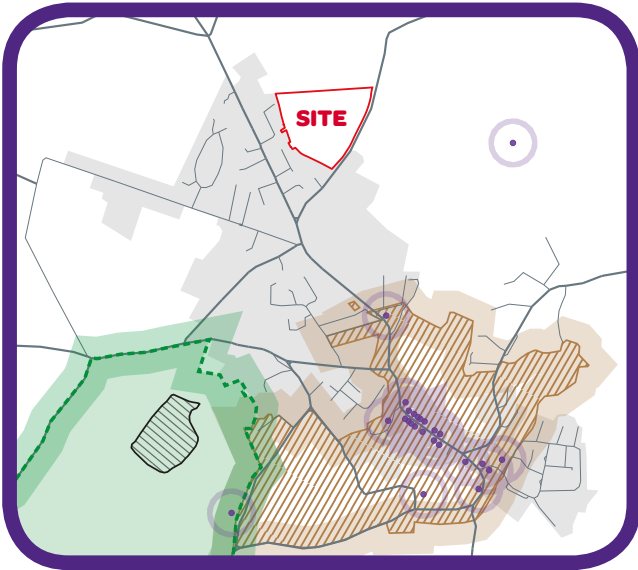
The site



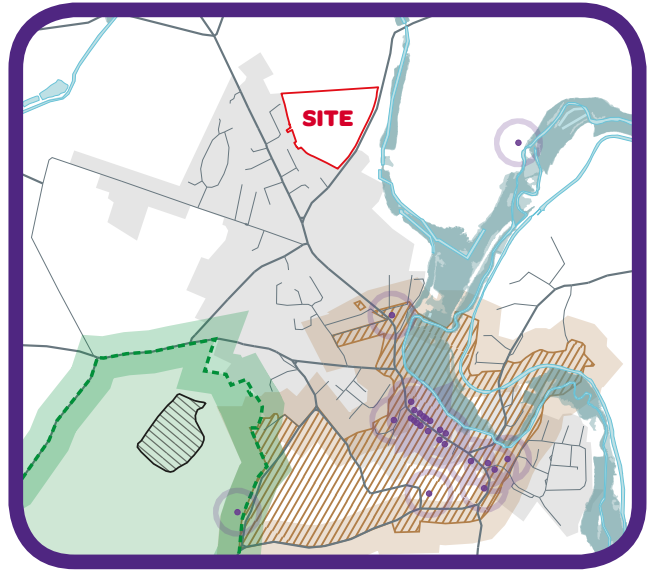
- away from heritage constraints



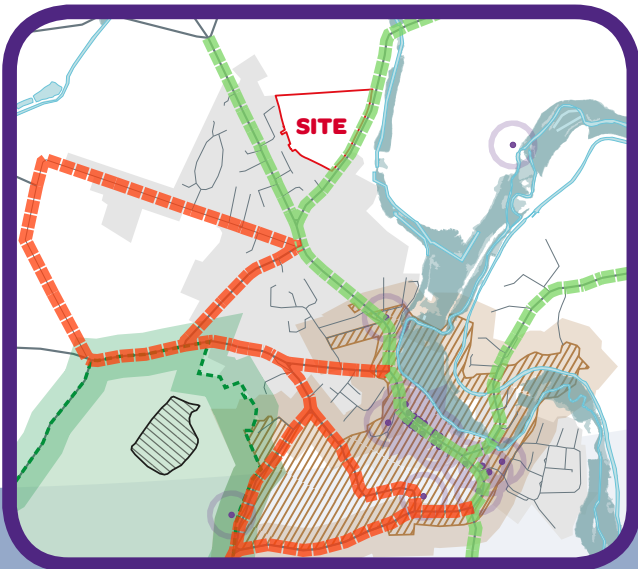
- away from landscape constraints



- away from flood risk areas



- with suitable highway capacity



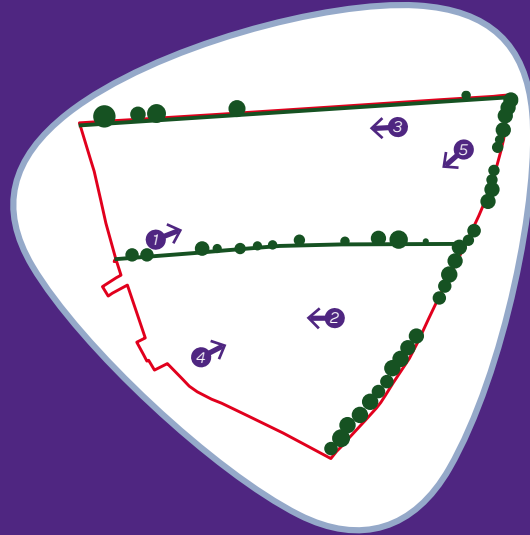
 A legend box containing the following items:

- The site (red outline)
- Listed building (purple circle)
- Conservation area (brown hatched area)
- Kinver Edge SSSI (green shaded area)
- Kinver Camp SAM (hatched area)
- Flood risk area (blue shaded area)
- Highway with spare capacity (green dashed line)
- Highway with restricted capacity (red dashed line)

Site context

The images below and on the adjacent page offer an insight into the site characters and setting as well as an understanding of the sites wide context.

Whilst currently used as farmland, the site is bound along its western and southern edges by the existing urban footprint of Kinver and represents an ideal opportunity to provide much needed housing land in a sensitive manner with minimal impacts on its setting.





Access and movement

Sustainable Travel Opportunities

The nearest bus stops to the site are located on Enville Road 400m south of the site and are accessible using existing pedestrian infrastructure.

From the southern extent of the site, there are footways along both sides of Hyde Lane with a minimum width of 1.5m. The majority of the footway is segregated from the carriageway with a grass verge. The footway continues along Enville Road towards the amenities within Kinver. Street lighting is provided on Hyde Lane and throughout Kinver. A zebra crossing is provided on Enville Road in the vicinity of the school, church and bus stops.

Accessibility

The site is well located in relation to all the basic amenities and services on offer in Kinver village. Schools covering all age groups, a dentist, convenience store and post office are all located within an acceptable walking distance of the site.

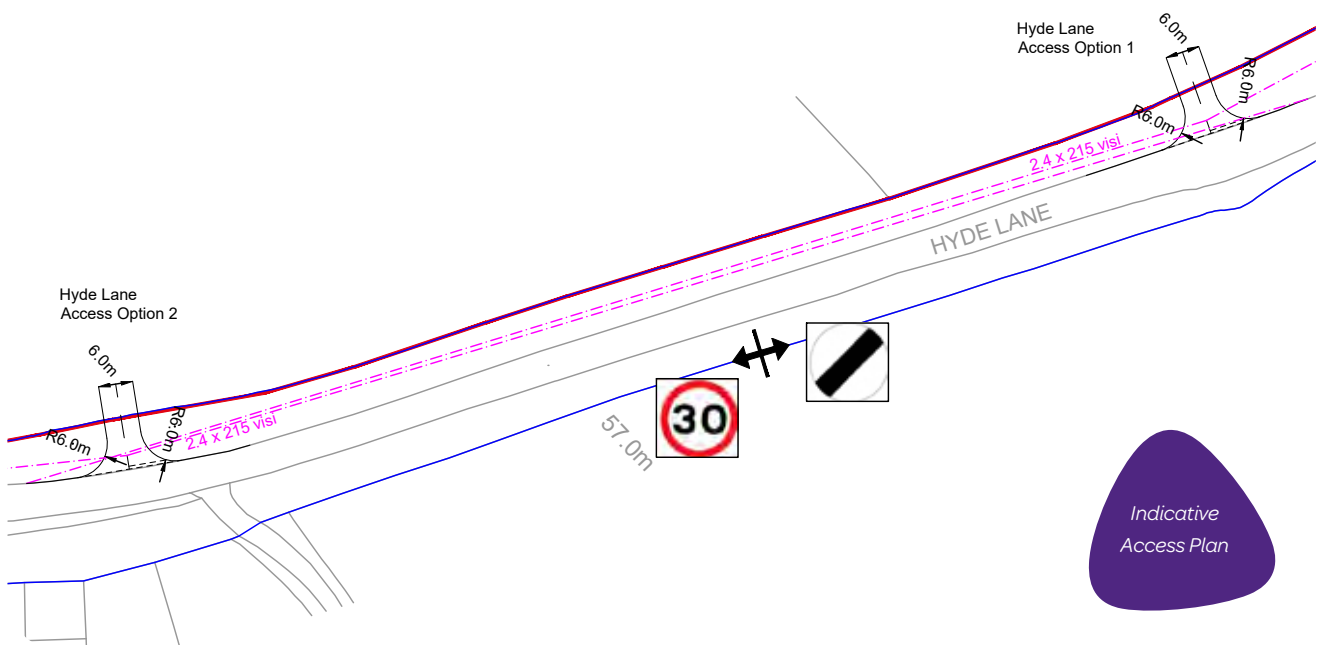
Vehicle Access Strategy

The site benefits from 370m of direct frontage with Hyde Lane, and this provides numerous opportunities to provide vehicular access to the site. The site has capacity for around 200 dwellings and this will require one, or two access points depending on the final number of dwellings that come forward.

Two potential access positions are shown on the plan below with the locations chosen identified as being optimal to reduce earthworks and the removal of vegetation:

- At the existing agricultural access to the northern field; and
- Opposite the existing dwellings on Hyde Lane.

The access points have been designed in accordance with DMRB and are deliverable within land under the control of Bellway. The access strategy has also been developed in consideration of the new access that will be provided to the housing allocation to the east of Hyde Lane. Both site of the site access points would be at least 100m from the access to housing allocation, and this is more than adequate in terms of junction spacing.



Pedestrian Access Strategy

The existing provision for pedestrians along Hyde Lane is of a good standard and this will be extended to the boundary of the site, all infrastructure can be provided within the site boundary or highway land.

There is an opportunity to provide an additional pedestrian and cycle access onto Cedar Gardens to provide increased connectivity particularly for the north western extent of the site. This infrastructure can also be provided within land under the control of Bellway and within highway land.

Summary

- There is a network of pedestrian routes providing direct access to local amenities within Kinver.
- The site is located within 400m of a bus stop which is served by all bus services within Kinver including regular bus services are provided between Kinver and Stourbridge and less frequent services to Kidderminster;
- The site is well located in relation to its accessibility of all the basic amenities within Kinver village. Schools, a dentist, convenience store and post office are all located within an acceptable walking distance of the site and a doctor's surgery is available within the preferred maximum walking distance.
- Given the existing transport infrastructure and proximity to local amenities, the site is well located for journeys to be undertaken by modes other than private car.
- Preliminary access designs for two options have been prepared which demonstrate that access can be provided which accords with the relevant design standards and there is flexibility in the access location.



Landscape

The site lies to the immediate west of Hyde Lane, on the north side of the village and has a predominantly easterly aspect with the north-western corner lying at around 76m AOD and the north eastern corner at around 56m AOD. The southern tip of the site lies at circa 60m AOD.

The site is bounded to the east by Hyde Lane which is defined by a slight bank with trees and outgrown hedgerow, to the west by rear boundaries of neighbouring properties located off Cedar Gardens and Hillboro Rise, to the north by an earth embankment topped with a poor quality, gappy hedgerow and to the south by the rear/side boundaries of residential properties off Hyde Lane.

The site itself comprises two field parcels separated by a dilapidated hedgerow with a sparse line of deciduous Larch trees. The most notable feature of the fields is their topography with the broadly easterly aspect complicated by more localised undulations aligned in an east-west alignment causing a 'ripple' effect moving southwards through the site.

Overall, the site does not demonstrate any landscape features worthy of absolute protection and retention other than the trees/hedges at its boundaries, many of which would benefit from improved management.



Kinver

Enville Lane

Visual amenity

The site's location to the northern side of the village, adjacent to well established modern development (latter half of the 20th Century) to the west means that it has the potential to integrate well with the existing settlement when seen in wider views.

Holy Austin Rock (St Peter's Church) is located to the south of the site, occupying the area with the greatest degree of elevation above the village (164m AOD). It provides expansive panoramic views over the village and the landscape beyond. Within views towards the site from this location the site appears well integrated with the existing settlement, appearing as a natural 'rounding off' of the northern edge.

Overall, the site's easterly aspect and the topography of the local landscape results in a relatively limited visual envelope which integrates the site with the existing village form. This means that the site is perceived as a logical extension of the village rather than an incoherent, disconnected addition.



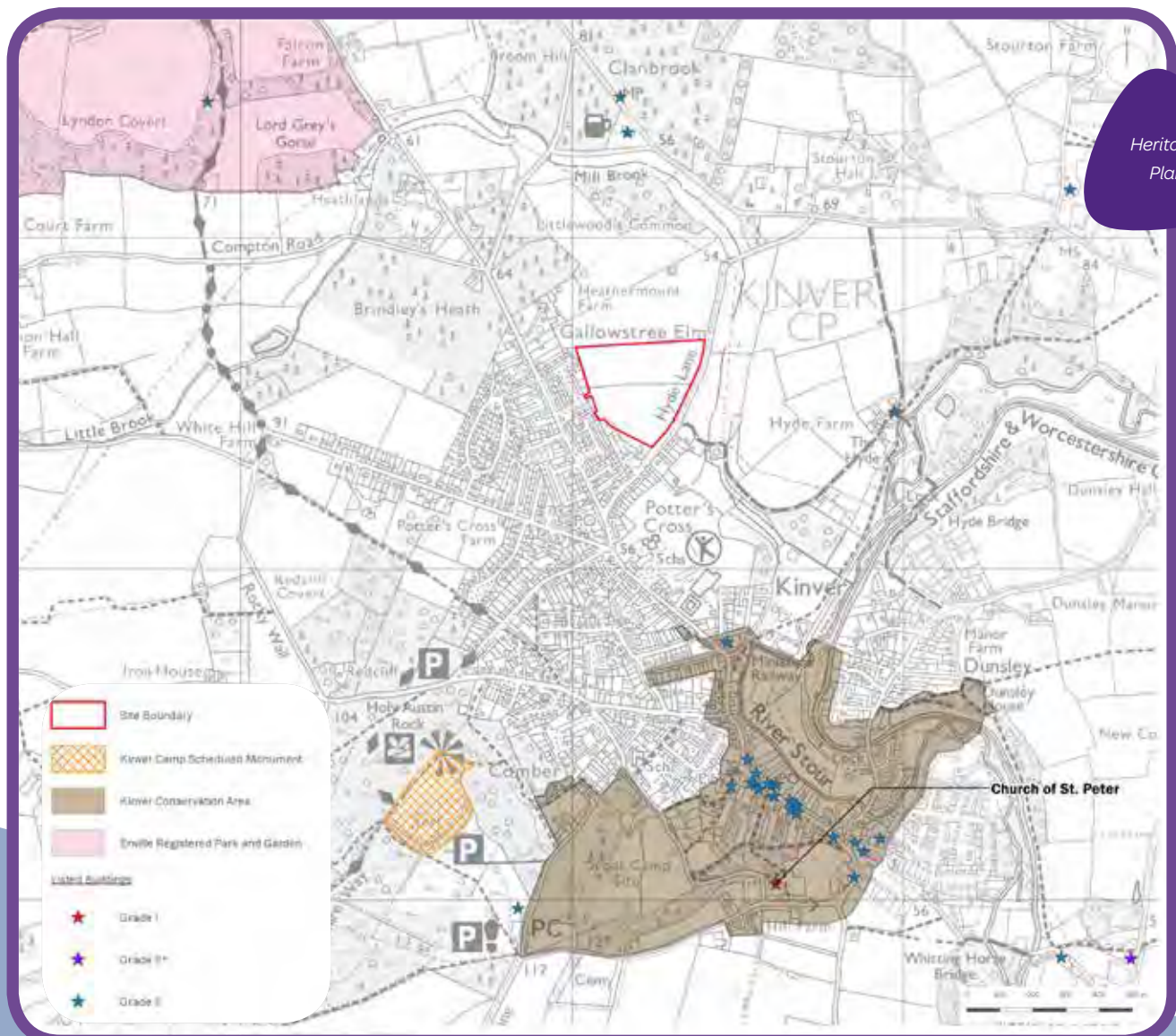
Heritage

The site does not contain any 'designated heritage assets' and neither is it located within the boundary of such an asset. There are no heritage constraints to the delivery of the site for development or in respect of its capacity to accommodate development.

The site is situated 1.3 km north of the Church of St. Peter Grade I listed building and 1.1 km north-north east of the Kinver Camp Iron Age hillfort Scheduled Monument, which both occupy the prominent ridge overlooking Kinver, and characterise the settlement's historic villagescape. It is located 550 m to the north of the Kinver Conservation Area.

The site is distant, and, whilst it is visible, there is nothing significant about it which contributes positively to the setting or the significance of these designated heritage assets. It is joined by 20th century housing estates accessed along a series of cul-de-sacs on the east side of Enville Road and the properties fronting the sides of Hyde Lane, to the west and east respectively.

It is concluded to be very unlikely that these designated heritage assets would be harmed by development within the site, in large part because of the intervening distance and land use.



Drainage

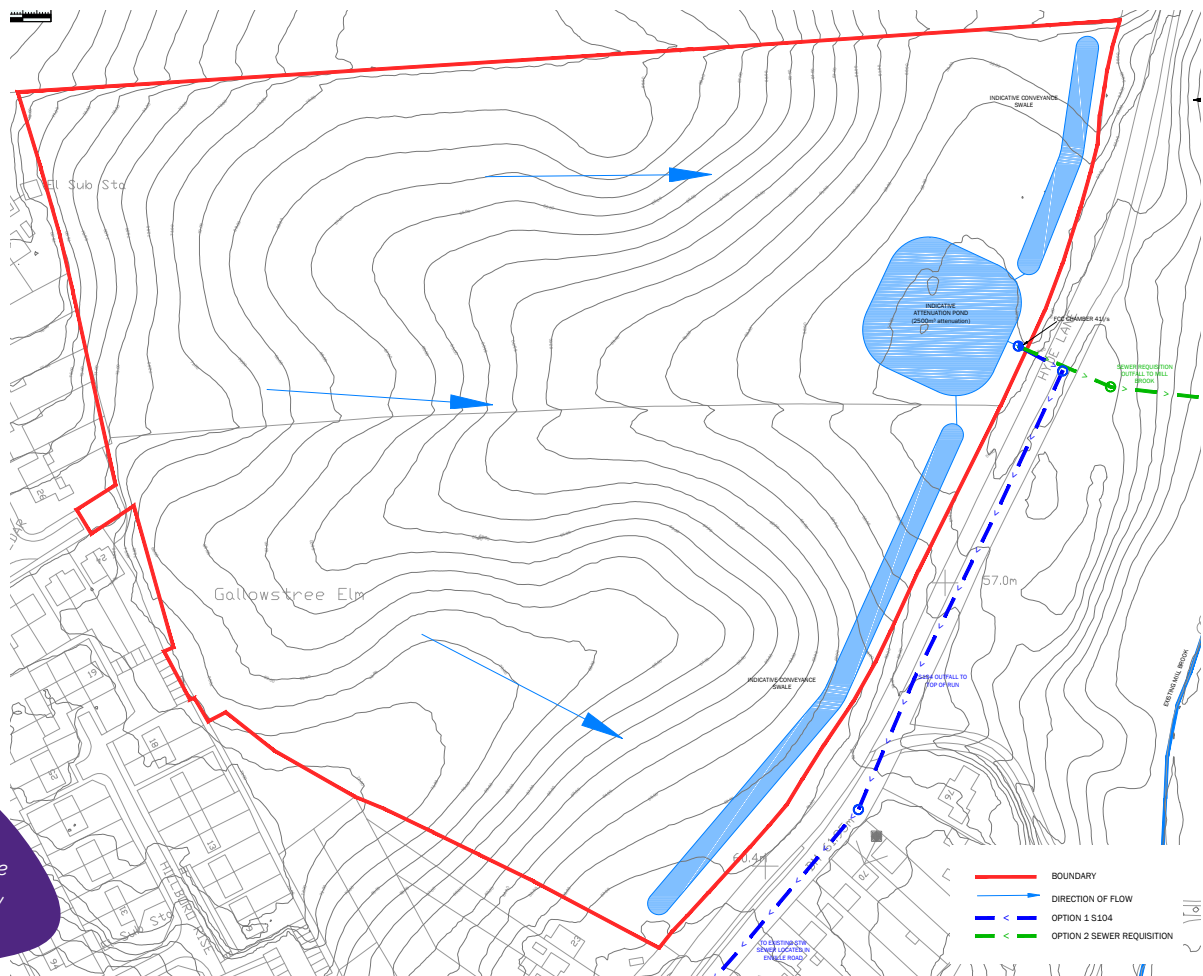
Fluvial flooding, occurs when a river or stream is unable to take on water draining in to it from surrounding land. The additional water causes the water to rise above its banks or retaining structures and subsequently flows onto the land.

The Environment Agency Indicative Flood Zone Mapping shows that the proposed development site falls within Flood Zones 1 (Low risk), meaning the site is not considered at risk of flooding from a watercourse or river.

Pluvial flooding refers to flooding from rainfall and the associated runoff. Surface water flooding is defined as flooding caused by rainfall generated overland flow before the runoff enters a watercourse or sewer. In such events, sewerage and drainage systems and surface watercourses may be entirely overwhelmed.

Surface water (pluvial) flooding will usually be a result of extreme rainfall events, though may also occur when lesser amounts of rain falls on land which has low permeability and/or is already saturated, frozen or developed. In such cases overland flow and 'ponding' in topographical depressions may occur.

It is understood that run off from Cedar Gardens to the West flows across the site in a low channel indicated from a comparison of EA data and LIDAR data, as shown on the plan below. This low and medium flood risk strip turns to a high risk when Hyde road is reached, due to a low spot in the topography. The pluvial flood route will be taken into account and considered as part of any future development layout.



Drainage strategy

Option 1 – Approximately 200 dwellings

This option proposes approximately 200 dwellings and associated open space, and has the potential to deliver a new doctor's surgery / community building.

As well as much needed new family homes, the proposal includes significant levels of Public Open Space along Hyde Lane resulting in a development set back, helping to retain the rural character of this rural route. With the exception of two new access points off Hyde Lane, all existing trees along the site boundary and existing hedgerows will be retained and enhanced, ensuring development has minimal impact on the surrounding character of the area.

Other features include naturalised attenuation in the form of SUDs and swales helping to support local biodiversity and mitigate impacts of flooding, as well as new native tree/shrub planning to help support local wildlife and act as a meaningful amenity to local residents. Proposals also include a new Local Equipped Area of Play (LEAP) for use by new and existing residents of the village.

Whilst representing the option containing the largest quantum of development, this option represents a sensitive and considered design solution to fulfilling long-term housing need.

Key

1. Access points
2. Main roads
3. Share streets
4. Lanes
5. Parking spaces
6. Rear gardens
7. Share surfaces
8. Pedestrian paths
9. LEAP (Local Equipped Area of Play)
10. Existing vegetation (trees and hedgerows)
11. Proposed trees
12. Attenuation basin
13. Public Open Space



Option 1 –
Approximately
200 dwellings



Hyde Lane

Option 2 – Approximately 110 dwellings

This option would respond to the scenario whereby the Local Plan Review needed to allocate circa 110 dwellings at Kinver. Similarly to Option 1, this option responds to the surrounding landscape and topography of the site, and includes the potential for a doctor's surgery / community building.

Key

1. Access points
2. Main roads
3. Share streets
4. Lanes
5. Parking spaces
6. Rear gardens
7. Pedestrian paths
8. LEAP (Local Equipped Area of Play)
9. Existing vegetation (trees and hedgerows)
10. Proposed trees
11. Attenuation basin
12. Public Open Space



Option 2 –
Approximately
110 dwellings



Option 3 – Approximately 45 dwellings

The most compact scale of development being considered, this option comprises around 45 new homes seeks to meet Kinver’s housing needs in a modest form.

This option proposes containing development to only the southern of the two fields which make up the Hyde Lane site, retaining the remainder of the southern field as Public Open Space and meadow grassland. Development is focused on the parts of the site least visible from the surrounding countryside, in particular along the lowest parts of site’s south-western boundary either side of the ridge which runs centrally through the site’s southern field. The proposals also allow for the creation of a positive interface between Kinver and the surrounding countryside.

The remainder of the southern field will be utilised as natural and meadowed Public Open Space including naturalised attenuation in the form of SUDs and swales helping to support local biodiversity and mitigate impact of flooding, as well as new native tree/shrub planting to help support local wildlife and act as a meaningful amenity to local residents. Proposals also include a new LEAP for use by new and existing residents of the village. With the exception of trees removed to allow for the single point of access being proposed, all existing trees and hedgerows will be retained and enhance with nature species.

Limited to around 45 residential units, this modest proposal not only meets the short-term housing need for the village, it does so in a way which ensures impact on the character of the village are kept to a minimum whilst ensure the rest of the site is made available to new and existing residents as a valuable wildlife and recreation amenity.

Key

1. Access points
2. Main road
3. Shared streets
4. Lanes/shared driveways
5. Parking spaces
6. Rear gardens
7. Pedestrian paths
8. LEAP (Local Equipped Area of Play)
9. Existing vegetation (trees and hedgerows)
10. Proposed trees
11. Attenuation basin
12. Public Open Space
13. Public footpath



Option 3 –
Approximately
45 dwellings



Hyde Lane



A vision for a new sustainable community within a relaxed landscape setting for Kinver.

Summary and conclusions

This Vision Framework document has been prepared on behalf of Bellway, in response to the growing housing requirements of Kinver and the wider area, and the need for South Staffordshire Council to plan strategically for sustainable housing growth to help meet the needs of future generations.

It seeks to demonstrate that land at Hyde Lane, Kinver is a suitable, sustainable and deliverable site for future development and is the most logical location for future housing.

Through a robust assessment of the site's spatial and environmental context, it has been demonstrated that the land at Hyde Lane is both suitable and appropriate for a sustainable and high quality future residential development.

As demonstrated by this Vision Document and the three options presented, the site has inherent flexibility to deliver a range of development options which can respond to Kinver's housing needs to be identified in the emerging South Staffordshire Local Plan Review. Bellway is keen to work with South Staffordshire Council, Kinver Parish Council, and the local community to evolve its proposals for Hyde Lane further.

It is concluded that the site is the most logical and sustainable location for future development to meet the housing needs of Kinver, as well as South Staffordshire as a whole.





For further information contact

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Turley

turley.co.uk

Appendix 2: EDP Hyde Lane Heritage Technical Note

Land off Dunsley Drive, Kinver, Staffordshire

Landscape Position Paper

edp4711_r007

1. Introduction, Purpose and Approach

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Bellway Homes ('the promotor') to prepare a Landscape Position Paper, which examines the prospect of future development on Land off Dunsley Drive, Kinver, Staffordshire ('the site').
- 1.2 The site is situated in Staffordshire, within the administrative area of South Staffordshire District Council, which acts as the statutory planning authority. South Staffordshire District Council has commenced a District Plan Review to identify land to accommodate the remainder of the adopted South Staffordshire District Plan (SSDP) housing requirement.
- 1.3 This Landscape Position Paper provides a preliminary appraisal of the site to inform the early consideration of its design and its promotion in the planning process. The Position Paper has been informed by a desk-based review of available data, policy, landscape character publications and mapping and by a site visit undertaken by an experienced Chartered Landscape Architect during early December 2019.
- 1.4 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The Practice operates throughout the UK from offices in Cirencester, Cardiff, Cheltenham and Shrewsbury. Details can be obtained at (www.edp-uk.co.uk).

2. Site Location and Site Description

- 2.1 The existing site comprises a parcel of land roughly triangular in shape. The site is located at Ordnance Survey Grid Reference (OSGR): SO 85195 83756 (centre of the site).
- 2.2 The site is within the West Midlands Green Belt. However, there are no National or Local landscape designations situated within or adjoining the quantum of the site.
- 2.3 The site lies to the immediate east of Dunsley Drive, on the eastern side of the village and has a predominantly western aspect with the south-eastern side edge sloping to the north-western corner, see **Image EDP 2.1** overleaf.



Image EDP 2.1: View from within the site looking south-easterly across rising landform. Photograph taken at OSGR: SO 85202 83807 (during December 2019)

- 2.4 The site is made up of two interconnecting fields, both of which are managed for equestrian grazing. There is a single-storey equestrian stable type building in the north-western corner of the site, with an existing gated access at this boundary from Dunsley Drive, see **Image EDP 2.2** below.



Image EDP 2.2: View from within the site looking north-west to an existing stable block on the northern site boundary. Photograph taken at OSGR: SO 85207 83828 (during December 2019)

2.5 The site is bounded:

- To the north, the site is bounded by existing two-storey residential dwellings situated off an associated private amenity space. These dwellings are accessed off Dunsley Drive and are arranged oblique to the site (looking east to west). The private amenity space is enclosed by low timber post and wire fencing with occasional trees, see **Image EDP 2.3** below;
- The eastern edge of the site is defined by a timber post and wire fence, beyond which there is an open pastoral field. Landform gently rises to the east to a landform, beyond which there is no visibility as landform drops away to the north-east towards the Kidderminster/Wolverhampton Road (A449). A number of existing residential dwellings arranged in a complex, are discernible from the site, see **Image EDP 2.4** overleaf;
- To the south, the site is bounded by an existing timber post and wire fence, with a private driveway and a collection of existing residential dwellings set with private amenity space with mature landscape features, see **Image EDP 2.5** overleaf; and
- The western site boundary is bounded by a timber post and wire fence, beyond which is a private driveway leading a number of two-storey residential dwellings set within private amenity space with mature landscape features. The north-western edge of the site is enclosed by Dunsley Drive, public roadway and with two-storey residential dwellings beyond, see **Image EDP 2.6** overleaf. The site is situated above the level of Dunsley Drive, which in places is approximately 1.25m overall.



Image EDP 2.3: View from within the site looking north towards the adjoining dwelling situated on Dunsley Drive. Photograph taken at OSGR: SO 85202 83807 (during December 2019)



Image EDP 2.4: View from within the site looking north-east towards the existing residential dwellings arranged in a complex. These dwellings are accessed from Dunsley Road. Photograph taken at OSGR: SO 85202 83807 (during December 2019)



Image EDP 2.5: View from within the site looking south towards the existing residential dwellings situated off a private drive from Dunsley Drive. Photograph taken at OSGR: SO 85202 83807 (during December 2019)



Image EDP 2.6: View from within the site looking north-west along the private driveway which encloses the western site boundary, with existing residential dwellings situated off. N.B. Many of these dwellings are two-storey and the Finished Floor Level (FFL) is below the ground level of the site. Photograph taken at OSGR: SO 85187 83703 (during December 2019)

2.6 There is no public access available to the site and no Public Rights of Way (PRoW) which pass through the quantum of the site. PRoW Public Footpath Kinver 94 is situated outside of the site, immediate to its southern boundary see **Image EDP 2.7** and **2.8**. However, there are no themed, promoted or long-distance walking routes which pass the site within its immediate environment.

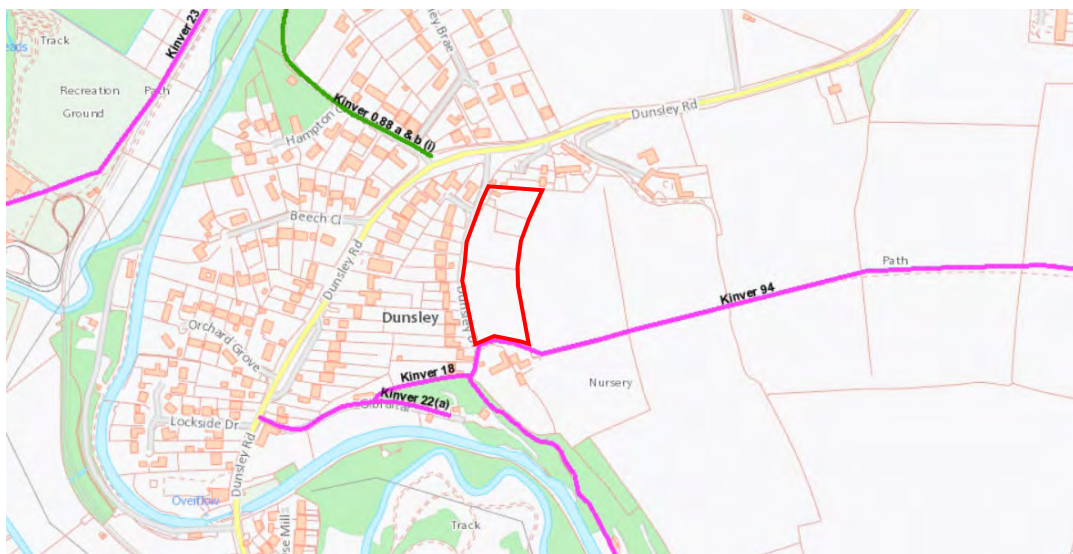


Image EDP 2.7: Extract from the Staffordshire County Council's online Countryside Access and PRoW Map. N.B. EDP has highlighted the site with a solid red line



Image EDP 2.8: View from outside of the site looking north-east from PRow (Public Footpath 94). Photograph taken at OSGR: SO 85187 83703 (during December 2019)

- 2.7 Overall, the site does not demonstrate any landscape features worthy of absolute protection and retention other than the trees/hedges at its boundaries, many of which would benefit from improved management. The site's topography is an interesting characteristic and could inform the layout of any future development.

3. Landscape Character

- 3.1 The site is situated within a landscape that has been characterised at National and County level. At National level, the site is located within National Character Area (NCA) 66: Mid Severn Sandstone Plateau, see **Image EDP 3.1** overleaf.

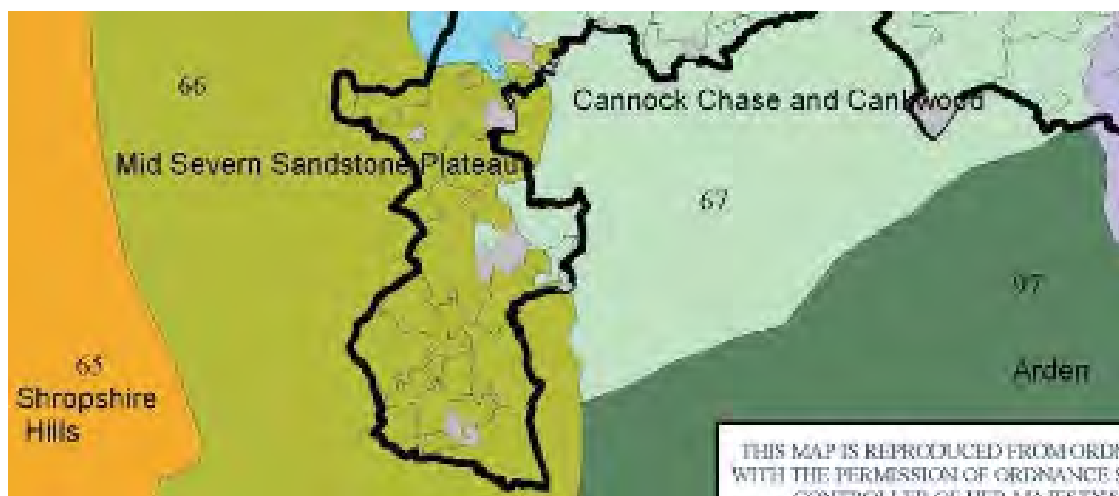


Image EDP 3.1: Extract from Map 2 of the Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011'

3.2 The County-wide landscape character assessment comprises the 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011', which remains current at the time of writing this Landscape Position Paper. The County Council find the site within the Sandstone Estate Lands Landscape Character Area, see **Image EDP 3.2** below.

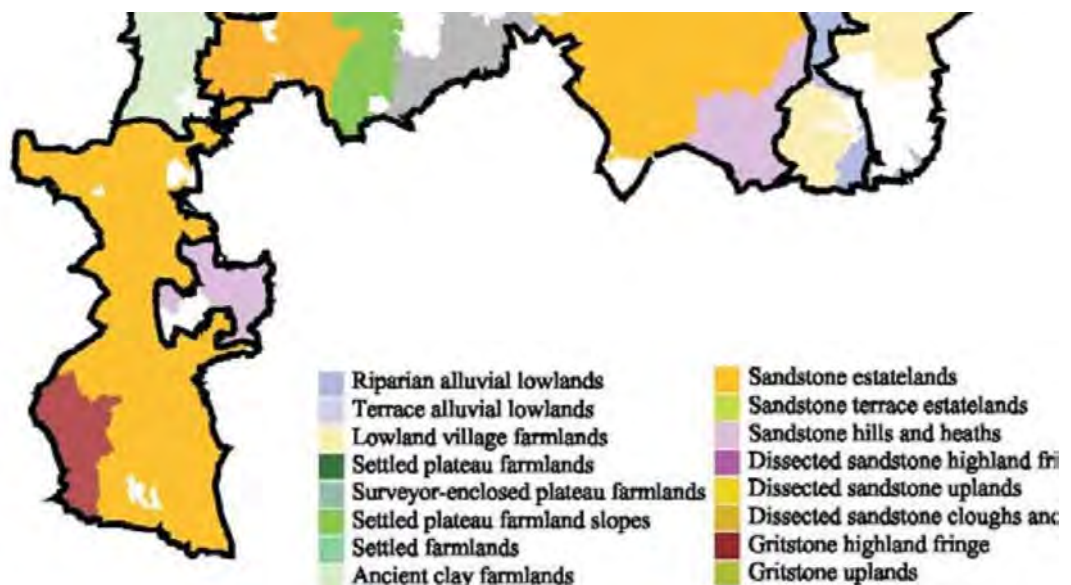


Image EDP 3.2: Extract from Map 4 of the Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011'. N.B. The site is situated within the Sandstone Estate Lands Landscape Character Area

3.3 The character of the Sandstone Estate Lands Landscape Character Area is described as follows:



“The woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type...Settlement is sparse, and characterised by expanded hamlets and wayside cottages...This is a landscape that appears far more wooded than it actually is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places. The slopes in turn give way to well-treed valleys...”

3.4 The County Council continue:

“Villages are expanding with the increase in commuter dwellings and small lanes show the obvious signs of becoming well used rat-runs. Where farmland abuts the conurbation the landscape reflects this influence, hedgerow deterioration being more evident and horsey culture becoming frequent.”

3.5 The County Council’s assessment notes, the following landscape features common to this landscape character area. EDP notes the underlined as common to the site and its immediate setting:

- *“Estate Plantations;*
- *Heathy ridge woodlands;*
- *Hedgerow oaks;*
- *Well tree’d stream valleys;*
- *Smooth rolling landform with scarp slopes;*
- *Red brick farmsteads and estate cottages;*
- *Mixed intensive arable and pasture farming;*
- *Large hedged fields;*
- *Halls and associated parkland; and*
- *Canal.”*

3.6 Further to this, under the heading of ‘Incongruous Landscape Features’, the County Council raises the following points relative to this landscape character area. EDP notes the underlined as common to the site and its immediate setting:

- *“Power lines;*
- *Village expansion;*



- *Urban edge;*
- *Modern farm buildings;*
- *Deteriorating hedgerows;*
- *Commuter dwellings; and*
- *Busy roads.*

3.7 Naturally, the degrading effect of such factors vary across the Sandstone Estatelands landscape character area with such factors, as aforementioned, having a greater or lesser effect on the intactness of the landscape character. In their assessment, the County Council asserts that the “*landscape character type is locally sensitive to the impacts of development and land use change.*”

3.8 A site visit was undertaken by a Chartered Landscape Architect during December 2019, at which, the character of the site was appraised. With reference to the key characteristics listed (above) for the Sandstone Estatelands landscape character area, this review found that there are a number of key differences within the site, including:

- No representation of “*...Estate Plantation*”, which is more reflective of land practice further north of the site within the wider open countryside beyond nearby estate plantations associated with the Enville and Stallybridge Estate (i.e. ‘The Million woodland’). There is a small parkland remnant around Dunsley Hall, off Dunsley Road which is approximately 0.75km north-east of the site. Consequently, the presence of “*Halls and associated parkland*” are outlying to Kinver and not within the environment of the site:
- No representation of “*...Commuter dwellings and urban edge*”, albeit, the site is situated on the village edge adjacent to well established modern development (latter half of the 20th century). Dunsley Drive is a quiet residential road, leading to Dunsley Road. Whilst traffic on Dunsley Drive is infrequent and Dunsley Road is one of a number of routes into Kinver;
- No representation of “*large hedged fields*” with the site situated in a field pattern of small to medium scale and hedgerows are commonly gappy in this location through either age, being outgrown or degraded or previously removed. The site is predominantly enclosed by timber post and wire fencing, with the probability of previous hedgerow extraction within the site;
- No representation of “*Red brick farmsteads and estate cottages*” as the site does not contain development, and that development surrounding the site is modern day, ‘sub-urban’ style built form; and



- No representation of “*well tree’d stream valleys*” at the site, or within its vicinity. Albeit, these features can be found in the wider landscape area.

3.9 EDP considers that the site makes only a limited contribution to the key characteristics of the landscape of the Sandstone Estatelands. Additionally, there are a number of landscape detractors discernible from the site. These detractors are predominantly associated with the position of the site on the village edge of Kinver and the perception of existing residential development from within the site, see **Section 2, Image EDP 2.3** and **Image EDP 2.4** above.

4. Visual Amenity

4.1 The site’s location to the eastern side of the village, adjacent to well established modern development (latter half of the 20th century) to the west means that it has the potential to integrate well with the existing settlement when seen in wider views. During the site visit, the Zone of Visual Influence of the site (i.e. those areas of the surrounding landscape which had potential views of the site) was established and then these areas were visited to establish whether ground level views were accessible and if so, how the site appeared.

4.2 **Image EDP 4.1** overleaf, illustrates the location of PRoW within the wider environment of Kinver and the open countryside which surrounds the village. This extract from Staffordshire County Council’s PRoW map demonstrates that PRoW are found to the east (Public Footpath Kinver 94) which progresses through open countryside away from the site on the settlement edge.

4.3 The route for Public Footpath 18 (adjoining the southern site edge and to the south-west) progresses through existing dwellings within the urban setting. Public Footpath 22a and 22b lead down to Staffordshire and Worcestershire canal (south of the site) and so are situated within a valley’d landscape that is well tree’d.

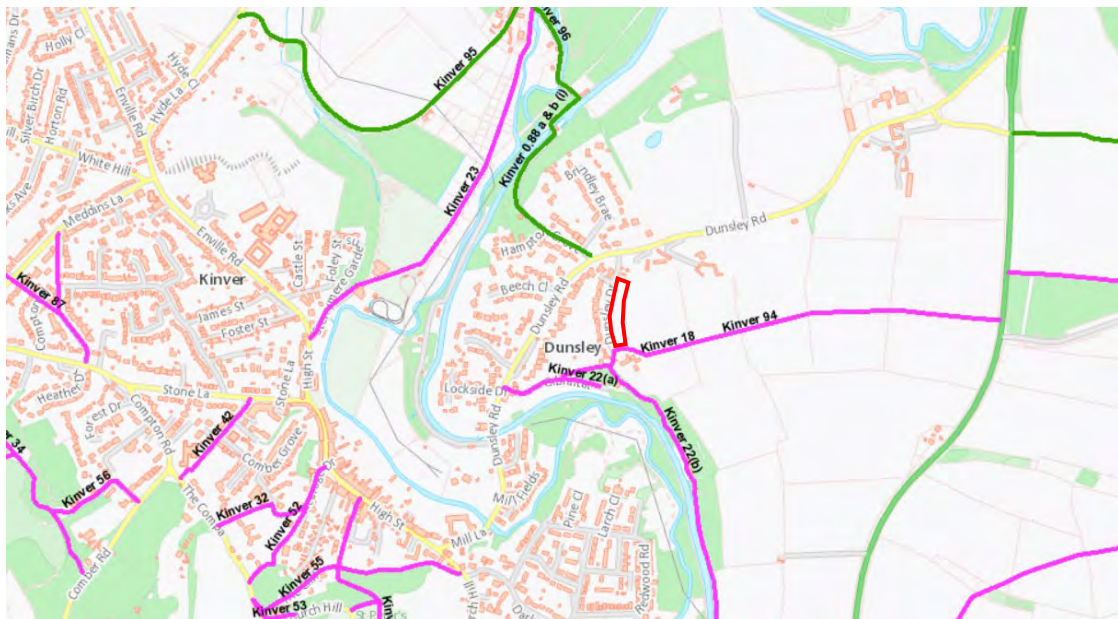


Image EDP 4.1: Extract from the Staffordshire County Council's online Countryside Access and PRow Map. N.B. EDP has highlighted the site with a solid red line

4.4 The broad extent of the view available from each of these areas is described below:

- To the north, the site is enclosed by the existing residential dwellings adjoining the site, and the combination of landform adjoining the site and the verge of Dunsley Drive and mature landscape features within private amenity space, see **Image EDP 4.2** below and **Section 2, Image EDP 2.6** above.



Image EDP 4.2: View from outside of the site looking south down Dunsley Drive towards the western site boundary. Photograph taken at OSGR: SO 85192 83866 (during December 2019)



- To the east, landform rises toward a Local ridgeline, beyond which landform falls easterly away towards the Kidderminster/Wolverhampton Road (A449), see **Section 2, Image EDP 2.4** and **Image EDP 2.8**. There are a small number of residential dwellings to the north-east which overlook the site. In the wider landscape, any vantage point for seeing the site would be well over 1km east;
- To the south, the site is overlooked a small collection of residential dwellings, with the PRoW Public Footpath 94 and 18 passing the site, see **Section 2, Image 2.5** and **Image EDP 2.8** above. Views from these Public Footpaths are already influenced by the settlement edge location. Beyond this, views of the site are substantially filtered, if not screened, by existing built form and mature landscape features;
- To the west, the site is bounded by either a public roadway or private driveway, with residential dwellings situated on, see **Section 2, Image EDP 2.6** above; and
- There is a network of PRoW situated south and south-west of the site on elevated landform above the village. With the greatest degree of elevation above the village these routes, including those around Holy Austin Rock and St Peter's Church, provide expansive panoramic views over the village and the landscape beyond. Within views towards the site from this the junction of Public Footpath 54 and 89 (see **Image EDP 4.3** below) the site appears well integrated with the existing settlement, with existing, long established development to either side (on Dunsley Drive), and development beyond the site (off Dunsley Drive). The site appears to be on the existing edge of the settlement but situated adjoining existing development and not situated on a prominent ridgeline where development may appear detached from the village and incongruous.



Image EDP 4.3: View from Public Footpath 54 and 89 on elevated landform around St Peter's Church, approximately 0.8km south-west of the site (at its closest point). Photograph taken at OSGR: SO 84711 83068 (during December 2019)

- From the residential properties situated off Dunsley Drive (primarily) and north-east of the site off Dunsley Road (see **Section 2** above), it is clear that these dwellings have advantage of the view over the site to the countryside beyond with several having 'picture windows' to enjoy this aspect. Though such views are not protected in planning policy terms, the design of any scheme here would benefit from being sensitive to these adjacent residents, ensuring their residential amenity is not significantly degraded.

5. Landscape Sensitivity

- 5.1 In July 2019, South Staffordshire District Council published their 'South Staffordshire Landscape Sensitivity Assessment' (Final Report). This assessment forms an important evidence base for the preparation of the South Staffordshire Local Plan.
- 5.2 The purpose of this study was to provide an assessment as to the extent of which 'the character and quality of landscape abutting is in principle susceptible to change as a result of introducing new built form.'
- 5.3 This study specifically considers new residential development. The settlement of Kinver is defined by this study as a 'Main Service Village' and therefore, a Tier 4 settlement in this study.

- 5.4 In terms of scope, this study considers the landscape sensitivity of land within the West Midlands Green Belt which is: *“immediately adjacent to selected South Staffordshire settlements (Tier 1-4 settlements) ... encompassing locations identified through the South Staffordshire ‘Call for Sites’ exercises, and land adjacent without promoted sites.”*
- 5.5 South Staffordshire District Council define landscape sensitivity as: *“the relative extent to which the character and quality of an area (including its vital attributes) is likely to change as a result of introducing a particular type of development.”*
- 5.6 This study appraises parcels of land, some of which are large and expansive tracts of land, the study includes the site within a wider parcel of land (identified by the South Staffordshire District Council as SL2), see **Image EDP 5.1**.

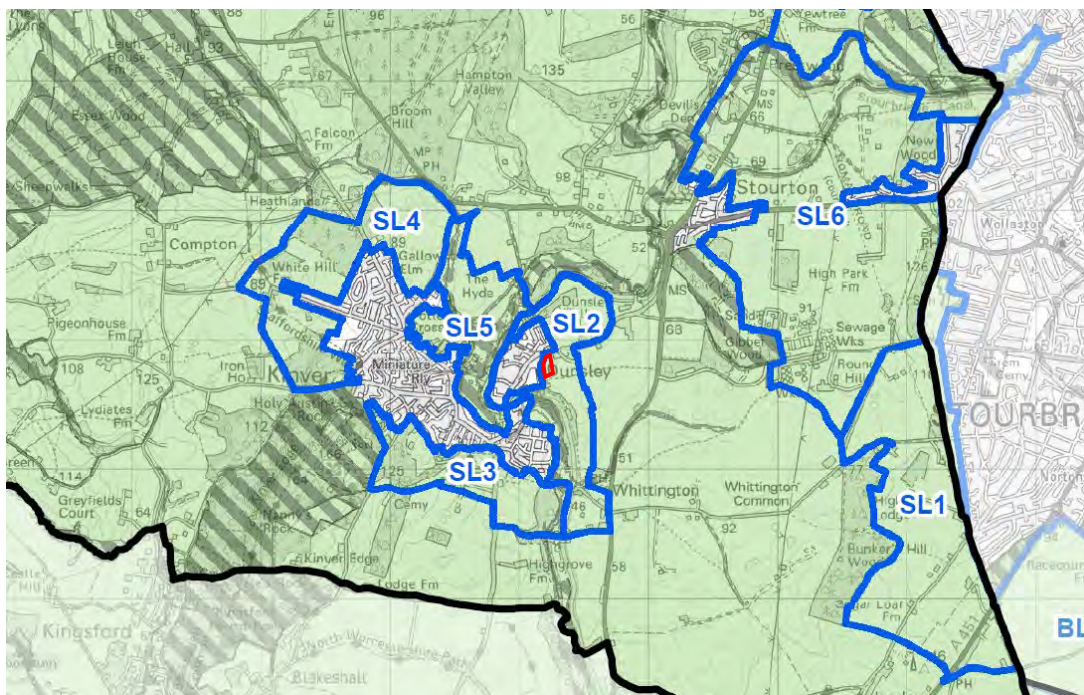


Image EDP 5.1: Extract from the South Staffordshire District Council’s South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019). N.B. EDP has highlighted the site with a solid red line

- 5.7 With reference to Table 4.1 of the South Staffordshire District Councils, South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019), the land parcel SL2 has an overall quantum of nearly 75ha, of which the site is less than 2ha and so is less than 2.5% of the overall land parcel. Staffordshire District Council assess land parcel SL2 as having an overall landscape sensitivity of Moderate – High.
- 5.8 With Chapter 3 of South Staffordshire District Councils, South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019), the rating of Moderate – High is not defined specifically by South Staffordshire District Council. Instead, the South Staffordshire



District Council directly defines only Low, Moderate and High. None the less, the South Staffordshire District Council consider that the land parcel has a relatively high landscape sensitivity and susceptibility to change, as this land parcel having some distinct, if not strong, character and qualities.

5.9 With consideration of the published methodology for this study and our own field-based assessment during December 2019, EDP considers that a site-specific assessment of the site would most definitely yield a lower landscape sensitivity than the wider land parcel, for the following reasons:

- The site has very limited features of value with previously extracted hedgerows replaced with timber post and wire fencing, limited native tree cover and poorly managed internal vegetation. The site's topography is probably the most interesting aspect. Consequently, the site makes a very limited, if any contribution to the key characteristics of the landscape of the Sandstone Estatelands; and
- There are a number of landscape detractors discernible from the site, which are predominantly associated with the position of the site on the village edge of Kinver. The perception of existing residential development enclosing the site to the north, south and western edges, which in some situations, overlooks the site's interior.

5.10 Landform continues to rise eastwards from the site towards a Local ridgeline, which is situated within open countryside beyond the village settlement and within the typical 'mixed intensive arable and pasture farmland' common to the Sandstone Estatelands landscape character area, see **Image EDP 5.2** below, as well as **Section 2, Image EDP 2.4** and **Image EDP 2.8** above.



Image EDP 5.2: View from within the site looking east towards the ridgeline outside of the site, beyond which landform falls easterly downwards to the Kidderminster/Wolverhampton Road A449). Photograph taken at OSGR: SO 85187 83703 (during December 2019)

- 5.11 The combination of this Local ridgeline, the settlement edge and roadway enclose the site and act as physical constraints. Consequently, the site is within these features which limit and contain the site. The site is experienced as being within the settlement edge of Kinver, and its domestic land use and character. When on site, especially in winter, one is aware of the presence of the surrounding village related land use, albeit, on the edge of the village rather feeling divorced from it, in the open countryside, like aspects of the wider land parcel SL2.
- 5.12 From a landscape and village character perspective, the domestic curtilages discernible from the site most definitely contribute to the perception of the site as village edge (see **Section 2, Images 2.3, 2.5 and 2.6** above).
- 5.13 The wider land parcel SL2 is situated further out to the village and through its combination of elevated landform and mature woodland blocks along the course of the canal and around Horse Bridge Lane. The site is more related to the settlement edge than the wider open countryside of the land parcel. Hence, the wider land parcel is experienced as divorced and poorly related to Kinver.
- 5.14 EDP considers that residential development in the wider land parcel SL2 would be subject to a greater landscape sensitivity than those areas on the periphery of Kinver, such as the site. Consequently, given the above factors, EDP would most definitely conclude that the site has only a Moderate landscape sensitivity at most.



6. Implications for Masterplanning

6.1 Any future development of the site should be informed by a Landscape and Visual Impact Assessment, the findings of which should help shape the scheme design. At this early stage, the preliminary landscape and visual appraisal has identified a series of key principles for the design of future development, which would assist in mitigating its landscape and visual effects and ensure it integrates effectively with the existing village form. These are:

- The existing external field boundaries to the site are weak, presenting an opportunity to establish new native hedgerows with tree planting and strengthen the landscape fabric of the site;
- The site will drain naturally to the western edge, with the north-eastern corner being the lowest point. On this basis, the western edge of the site should be utilised for sustainable drainage attenuation features designed as attractive landscape components. This initiative has the potential to provide an attractive focal point in this part of the village, set within a compact 'village green' style open space. This would help connect the new development with the existing settlement;
- The layout of the site should seek to work with and reflect the site topography;
- There is an opportunity to create a central route which capitalizes new landscape fabric to aid the 'sense of place' of the development;
- Existing dwellings to the northern edge (situated off Dunsley Lane) should be 'backed' with new development, but length of garden and height of building should be carefully considered to try to mitigate effects on residential views and amenity;
- Development should be stepped back from the southern boundary and carefully considered to try to mitigate effects on residential views and amenity on neighbouring dwellings; and
- Architectural proposals should seek to reflect the vernacular of the older parts of the village.

7. Conclusions

7.1 The site to the east of Dunsley Drive, Kinver lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed. In elevated views from Holy Austin Rock, to the south of the village, the site is not seen. However, might the proposal be discernible from elevated landform at Kinver Edge, the site appears to be on the existing edge of the settlement, but



situated adjoining existing development and not situated on a prominent ridgeline, where development may appear detached from the village and incongruous.

7.2 Furthermore, as the site is sandwiched between existing development on the eastern edge of Dunsley Drive and inside, and below topographically, the extent of ribbon development along Dunsley Road, the development of the site would avoid any perception of 'sprawl' into the countryside beyond.

7.3 The following main matters have been identified within this Position Paper and are summarised below.

Relevant Designations:

- The site is situated within West Midlands Green Belt however, the site does not lie within, or adjoin any Nationally or Locally designated landscape; and
- Whilst there are a number of PRoW within the wider open countryside and adjoining the southern site edge, there is no public access into the site.

Visual Amenity:

- Visually, the site is enclosed through the combination of landform and mature landscape features in the open countryside surrounding the site. Additionally, the adjoining residential development sandwich the site within built form, enclosing the site and limit direct views from the adjoining village settlement;
- Views of the site are limited to the immediate geographical area to the western and north-western edge of the site, with no long-distance views identified. In addition, there are limited views available from the Public Footpath Kinver 18 and 94 to the south-west of the site, which pass through open countryside. Furthermore, it is unlikely the development of the site is likely to be seen from Public Footpath 22a and 22b, which pass through a well tree'd valley landscape; and
- The site is overlooked by a number of residential dwellings, see **Section 2** above. These receptors are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity is protected however and, as such, the scheme design should be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high quality development in architectural terms.

Landscape Character:

- Heathy, wooded ridgeline, mature hedgerow oak trees within extensive hedgerows are characteristic of the landscape, but these features are not present within the site, or



its immediate setting. Therefore, there is an opportunity to strengthen local landscape character through new landscape planting, including new hedgerow and tree planting; and

- The site makes only a very limited contribution to the key characteristics of the landscape character area of the Sandstone Estatelands, with typical landscape features appearing more intact in the wider open countryside surrounding Kinver village.

7.4 Overall, this Position Paper has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.

7.5 The over-arching landscape strategy should look to integrate the site with Kinver, incorporating the existing trees and hedgerows and facilitating green infrastructure through the site, breaking up the mass of the development and offering new recreation links.

7.6 In conclusion, the site to the east of Dunsley Drive, Kinver, lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed.

7.7 Subject to these considerations, further technical studies and development of a well-designed masterplan and landscape strategy, there is no in-principle reason to prevent development of the site in landscape and visual terms. In conclusion, therefore, this preliminary appraisal has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.

Appendix 3: EDP Hyde Lane Landscape Position Paper

Land at Dunsley Drive, Kinver, Staffordshire

Heritage Appraisal

edp4711_r006

1. Introduction

1.1 This Heritage Appraisal provides a preliminary appraisal of the Dunsley Drive site at Kinver, Staffordshire, the aim of which is to inform the early consideration of its design and promotion in the planning process. This Heritage Appraisal has been informed by a desk-based review of data relating to heritage assets and is supported by a visit to the site and its immediate environs. This Heritage Appraisal should be read in conjunction with the preliminary Landscape and Visual Appraisal (LVA), which sets out the character of the site and establishes, in basic terms, its visual envelope.

2. Site Description

2.1 The site is to the east of the village of Kinver, South Staffordshire. It is approximately 1.16 hectares (ha) and comprises agricultural land which gently slopes from east to west. It is bounded to the north, south and west by existing residential development and open agricultural land to the east. The site's western boundary is formed of an existing hedgerow interspersed with trees, beyond which lies Dunsley Drive, from which the site will gain 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 trees and hedgerow planting.

2.2 The LVA establishes that the topography of the Local landscape results in a relatively limited visual envelope. To the east, intermittent views of the site are available from the immediately adjacent fields, but not further than the ridgeline c.200m distant. To the west, north and south, the existing residential development on the Dunsley Drive screens the site from any short or mid-distance views (i.e. from Dunsley Road or beyond). The tree belts to the south/south-east of the site are an additional screening element within the Local landscape, particularly in terms of blocking views to/from the Kinver Conservation Area (CA) and in the direction of the canal.

2.3 There are no views of the historic core of the settlement of Kinver, but there is intervisibility with Kinver Edge, c.1km to the south-west. As described below, Kinver Edge and the heritage sites located there (notably the church, Rock Houses and Iron Age Hillfort) have panoramic views to the north and north-east, over the village of Kinver and the landscape beyond.

3. Legislation and Policy Review

National Planning Policy Framework

- 3.1 The National Planning Policy Framework (NPPF) sets out the government's approach to the Conservation and Management of the historic environment, including both listed buildings and CAs, through the planning process (Section 16). The opening paragraph 184, recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Subsequent paragraphs stress the desirability of preserving heritage assets and applies a test of 'substantial' or 'less than substantial' harm for those assets which are affected by development.

Legislation

- 3.2 The relevant legislation concerning the treatment of scheduled monuments is the *Ancient Monuments and Archaeological Areas Act 1979*. This act details the designation, care, and management of scheduled monuments, as well as detailing the procedures needed to obtain permission for works which would directly impact upon their preservation. The act does not confer any statutory protection on the setting of scheduled monuments although this is considered as a policy matter in Paragraph 193 of the NPPF.
- 3.3 Sections 66(1) and 72(1) of the (*Planning Listed Buildings and Conservation Areas Act 1990*) set out the duties of Local Planning Authorities (LPAs) in respect of the treatment of listed buildings and CAs through the planning process. Section 66(1) of the 1990 Act sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting. In respect of CAs, Section 72(1) of the 1990 Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

South Staffordshire Local Plan

- 3.4 The South Staffordshire Local Plan contains a range of policies and land allocations and is made up of the Core Strategy and Site Allocations Document (SAD). These replace the 1996 Local Plan and together deliver the Local Planning Strategy for South Staffordshire. The Core Strategy was adopted in 2012 and the SAD in September 2018.
- 3.5 Under Environmental Quality, Strategic Objective 5 is as follows: "*To protect, conserve and enhance the historic environment and heritage assets and ensure that the character and appearance of the District's Conservation Areas is sustained and enhanced through management plans and high-quality design.*"
- 3.6 Within Core Policy 2 (Protecting and Enhancing the Natural and Historic Environment), the salient policy is EQ3: "*Conservation, Preservation and Protection of Heritage Assets.*" This

sets out a number of means by which the preservation of South Staffordshire's historic environment will be achieved. Those relevant to this Appraisal are as follow:

- c. *"The Council will ensure that development which affects a heritage asset or its setting will be informed by a proportionate assessment of the significance of the asset, including its setting, which is likely to be affected by the proposals. These will be judged by considering the extent to which an asset's archaeological, architectural, historic or artistic interest will be harmed, including its conservation, in the interest of present and future generations.*
- d. *In the case of development in a conservation area, proposals will be considered against any management plan and appraisal adopted for that area.*

Development proposals should be consistent with the NPPF, the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions) and other local planning policies."

Kinver Conservation Area Management Plan (2011)

3.7 Most of the Management Plan concerns the boundary and buffer of the CA, and development within this defined zone. As such, these do not apply to the proposed development of the site. However, section 3.2 concerns the protection of the broader landscape setting and views and are therefore relevant to this Appraisal. The management plan states that:

3.2.1 *"The landscape setting of the Kinver Conservation Area is very important. It has been established that new development on the edges of the conservation area affects views into and out of the conservation area, and can adversely affect the area's special architectural or historic interest ...*

3.2.3 *Views across the Kinver Conservation Area are very important given the dramatic topography and river- and canal-side location. The unique qualities of the conservation area rely on the continued protection of these views.*

3.2.5 *Action: The Council will also seek to ensure that these views remain protected from inappropriate forms of development and that due regard is paid to them in the formulation of public realm works or enhancement schemes."*

4. Heritage Baseline

4.1 The site does not contain any 'designated heritage assets' (as defined in Annex 2 of the NPPF), nor is it located (either wholly or in part) within the boundary of such an asset. As such, there are no 'in principle' heritage constraints to the delivery of the site for development, or in respect of its capacity to accommodate development.

- 4.2 In respect of non-designated sites, an informal examination of data from the Staffordshire Historic Environment Record (HER) does not indicate any known archaeological features or finds within the site. (As a caveat, this search was undertaken via the Heritage Gateway portal, as opposed to a formal request to the HER. Consequently, the data obtained may be neither up-to-date nor comprehensive. It is also the case that the site has never been subject to archaeological investigation, so this apparently 'blank' area in the HER dataset may simply reflect an absence of evidence).
- 4.3 Abutting the site to the north, the HER records the former Dunsley Farm (MST17982). This was a farmstead on a courtyard arrangement: the farmhouse has been demolished but other 18th and 19th century buildings still remain, converted to dwellings. The farm is suspected to have earlier origins. A related HER entry for an area immediately to the east, relates to Dunsley Manor Farm (MST 17981). To the south of the site is Dunsley House, an un-listed historic house which dates to the early 19th century.
- 4.4 Turning to the wider locality of the site, the baseline data indicates several assets that require consideration by this Appraisal. These are discussed in turn below, and are as follow:
- Enville Registered Park and Garden (Grade II*) and its component listed buildings;
 - Church of St Peter, Kinver (Grade I listed building);
 - Kinver CA;
 - Staffordshire and Worcestershire Canal CA;
 - Kinver Camp Iron Age Hillfort (scheduled monument); and
 - Holy Austin Rock Houses, Kinver Edge (non-designated asset).

Enville Registered Park and Garden (NHLE Ref. 1000114)

- 4.5 The manor of Enville was held from the early 16th century by a minor branch of the Grey family, which survived the aftermath of Lady Jane Grey's brief assumption of English rule in 1553. A new house was built on the estate in the mid-16th century and forms the core of the present Grade II listed Enville Hall (NHLE Ref. 1230636). The house was enlarged by stages in the late 17th and early 18th centuries, and again in the 1770s. Various alterations were also made in the early 20th century. The park itself was a creation of the mid-18th century, completed by the 1770s, extending to the south of the Hall over 750 acres with a variety of buildings, lakes, cascades and bridges. It declined in the early 19th century before new gardens were developed to the north of the Hall in the Victorian period. The early 20th century once again saw decline, before restoration in recent decades.

4.6 The site and the registered park are separated by 2.5km. Immediately to the north-west of the site, the existing housing on Dunsley Road/Dunsley Drive precludes views towards the park, beyond which is a landscape of farmland with mature hedges, woodland blocks and further areas of residential development. There is no intervisibility between the site and the park, nor any historical connection between the land occupied by the park and that of the site. The site therefore does not contribute to the setting of the park, or its character, key views and visitor experience. The site's development would therefore not affect either the significance of the park or the significance of the listed buildings it contains.

Church of St Peter (NHLE Ref. 1230950)

4.7 The Church of St Peter, Kinver, is a Grade I listed building. The main body of the structure, including the tower, is mainly early- to mid-14th century in date, incorporating some 12th century fragments of an earlier church and with substantial mid-15th century extensions. It was restored in 1884 - 85. The church lies at the summit of a steep sided ridge, above and to the south of the historic core of the village, these attributes providing its setting and historic context.

4.8 The church is separated from the site by c.1.3km. Immediately below the church is the historic core of Kinver, focused on the curvilinear course of High Street running into Church Hill. Modern housing developments along Dunsley Road, Public Open Space (POS), pastoral farmland and woodland occupy the remainder of the intervening ground.

4.9 Looking outwards from the church, the site is a distant element in the view from the north-eastern edge of the churchyard. Looking through the mature woodland that fringes the churchyard, the site is partially visible, albeit partially obscured by existing houses on Dunsley Drive and by the trees near the site's southern margins. In the opposite direction, outwards from the site, the church tower is a prominent feature on the skyline.

4.10 The site does not make a positive contribution to the church's setting. Arguably the outward views *from* the church are less significant than views of and *including* the church. It is a prominent structure, clearly intended to be seen from a distance, the present gap in the woodland on Kinver Edge emphasises this situation.

4.11 The extent to which outward views from the churchyard are relevant to the building's *historic* setting (as opposed to a more general visitor amenity) is more questionable. The windows on the north side of the church are narrow (both in the original structure and the modern extension) and in any case, church windows are intended to allow light into the structure, as opposed to facilitating outward views. The churchyard clearly affords extensive north and eastward views of Kinver and its surroundings and provides the landscape context, but the extent to which these views contribute to the historic setting of the church is questionable. The sightline to the church of St Mary at Enville (NHLE 1230632) is perhaps more significant.

4.12 These abstract points aside, the practical reality is that the site merely forms part of the backdrop of both the church and the village's historic core. In terms of changes to the existing view, if developed for housing, the site will appear as a very minor extension of the 20th century housing estates that are already present on either side of Dunsley Road around this location. The extent of visual change will be minimal, and the significance of the church unaltered.

Kinver Conservation Area

4.13 The Kinver Conservation Area Management Plan (adopted 11 November 2011) sets out a mid-to long-term strategy in the form of a series of recommendations and guidelines. The extent and composition of the CA is set out in paragraph 2.1.1 of the document, as follows:

"The Conservation Area covers the historic High Street, with its shops, banks and other commercial premises; the green fields and woods which lie up steeply rising hills to the south west, forming Kinver Edge; Church Hill and the historic St. Peter's Church, visible on the crown of the hill from many vantage points in the conservation area; and, lastly, the sinuous curves of the River Stour and the adjoining Staffordshire and Worcestershire Canal, between which lie open fields and areas of woodland."

4.14 Paragraph 3.1.2 subsequently observes that:

"Despite mainly late 20th century housing, which lies in closely defined areas to the west, north and east of the conservation area, Kinver retains a village quality, which is reinforced by the rural setting and waterside location."

4.15 Paragraph 3.2.1 further adds that:

"Kinver is notable for the high sandstone ridge which forms the southern and western part of the conservation area, and which lies about 50 metres above the High Street. This forms a backdrop in views from the High Street and beyond, punctuated by the outline of St. Peter's Church on the skyline."

4.16 The CA presents the most significant heritage-based constraint to growth around the village because of its location, extent, integrity and coherence, and setting. The gently falling, open agricultural landscape to the south of Church Hill makes a strong positive contribution to the special interest of the CA, illustrating and emphasising its rural origins and context, as well as representing a striking contrast with the prominent ridgeline sheltering the historic core of Kinver on the north side. This represents a clear argument against settlement growth in this direction. The mosaic of woodland and farmland west of Kinver and the rolling agricultural fields to the east, similarly serve to restrict growth in these directions because these aspects of the landscape form key aspects of the setting of the CA. They contribute positively to its special interest by maintaining the village's character as a historic rural settlement and

connecting it to its wider agricultural hinterland, despite its substantial growth to the north during the 20th century.

- 4.17 The site abuts the north-east corner of the CA. At the boundary is Dunsley House and its garden (early 19th century, noted above as HER record MST 17983). Beyond the house to the south and west, the CA is characterised by woodland, particularly along the corridors of the Staffordshire and Worcestershire Canal and the River Stour, and POS. The closest housing estate is that on the lane named Kernose Mill, 500m south-west of the site boundary.
- 4.18 There is little intervisibility between the site and the adjacent parts of the CA. Dunsley House and the properties at the southern end of Dunsley Drive (West Point House, Elsfield) block much of the view, while the woodland within 100m of the site boundary precludes views further into, or outwards from, the CA. The 'positive views' in this locality identified by the Conservation Management Plan's Townscape Appraisal map, including that northwards from the canal, will not be altered. These comments are reiterated below in respect of the Staffordshire and Worcestershire Canal CA.
- 4.19 Where the more elevated parts of the CA are concerned (i.e. Kinver Edge) the same comments apply as for the church – namely that the site is visible as a small open area immediately beyond the modern urban fringe. It contributes to the setting of the CA to the same extent as other agricultural land on its margins, but its development for housing will bring minimal change.
- 4.20 Given the importance afforded to the 'green' and open spaces within the CA set out by the Management Plan, it is obvious that future residential growth should be focused away from this designated heritage asset, in order to avoid or minimise harm to its character and appearance. As set out above, in physical terms the proposed development of the site will achieve this aim, avoiding land-take within the CA boundary. Equally, development here will not significantly affect the visual setting of the CA, bringing only negligible changes in views from relatively distant viewpoints on Kinver Edge.

Staffordshire and Worcestershire Canal Conservation Area

- 4.21 The Staffordshire and Worcestershire Canal passes to the east of Kinver. Where it falls within the Kinver CA, it is not separately designated. To the south and north-east (i.e. beyond the Kinver CA boundary), the canal is afforded its own separate CA designation.
- 4.22 To the south of the site, the canal comes within 190m of the site, before turning to follow a sinuous course west. It then turns north and north-east, such that it wraps around the north of the site, at a closest distance of c.300m.
- 4.23 To the north, the site and the canal CA are separated by the existing housing estates on the north side of Dunsley Road. There would be no intervisibility between the site and CA in this direction, while intervisibility with the canal further to the north-east are also precluded by housing and the natural landform. On the south/south-west side, the comprehensive

screening effect of Dunsley House, the modern housing on Dunsley Drive and of woodland on the canal fringe is as described above for the Kinver CA.

- 4.24 In physical terms, therefore, the proposed development will have no effect on the special interest of the CA for the canal. In setting terms, it will bring no change to the canal's visual environment. It will, however, contribute in a small way to the general cumulative effect of modern development, in which the canal's originally rural course to the east of Kinver, well-separated from the town, now contains more suburban elements. Despite this, no significant impact on the CAs character and appearance is predicted.

Kinver Camp Iron Age Hillfort (NHLE Ref. 1015432)

- 4.25 This scheduled monument is situated at the north-west corner and highest point of the Kinver escarpment, on the south-west outskirts of Kinver village. It includes the earthwork and buried remains of a univallate Iron Age fort. The Hillfort's earthworks are sub-rectangular in plan with external dimensions of c.210m by 300m, enclosing an area of approximately 3.75ha.
- 4.26 In respect of its setting, the Hillfort's position on the Kinver escarpment is critical to an understanding of its function, intended both as a defensive site and also one which dominated the surrounding landscape. The earthworks have intrinsic visual interest, whilst from Kinver and its environs the site of the fort is a prominent landmark.
- 4.27 The site lies 2.5km east of the scheduled monument. The summit location of the Hillfort must once have afforded it broad landscape views in all directions, but the mature woodland on its west and north sides now mean that its primary vistas are now to the south and east, only becoming partially open in other directions during winter. The site does not make a positive contribution to the monument's setting. Its development for housing will bring negligible visual change, if any, and will not affect the setting of, or views from, the monument.

Kinver Edge Rock Houses

- 4.28 This non-designated asset comprises a series of six houses cut into the cliffs at Holy Austin Rock (Staffordshire Historic Environment Record Ref. MST 1158). These are of possible 17th century date, although the name may indicate that the dwellings were occupied as a hermitage prior to the Reformation. The houses were inhabited as domestic dwellings until the mid-20th century. The core element of their setting is, self-evidently, Kinver Edge, of which these houses are an integral part. The village below provides their broader context.
- 4.29 The Rock Houses and the site are separated by 2.5km. As with the Hillfort, the site is visible but is an inconsequential element in the view and does not make a positive contribution to the setting of this asset. Views of and including the Rock Houses are southward-looking, obtained from Compton Road and the adjacent woodland, and do not include the site. If developed for housing, the site will appear as a very minor extension of the 20th century

housing estates that extend in this direction. The significance of these assets will be unaffected.

South Staffordshire Historic Environment Assessment

- 4.30 The Historic Environment Assessment (HEA) divides South Staffordshire into 13 project areas and aims to establish the potential for the historic environment of each to absorb new development and housing in particular. This has been carried out by dividing each of the project areas into 'Historic Environment Character Zones' (HECZs) and assessing the significance of the heritage assets of each zone.
- 4.31 The site falls within two Kinver (KV) project areas: the greater part within character area KVHECZ 2 – East of Kinver and Dunsley, with the small fenced enclosure in the north of the site within KVHECZ 3 – Dunsley (HEA, Appendix 4).
- 4.32 KVHECZ 2 (including the site) is almost entirely characterised by a landscape created by piecemeal enclosure. This is suggested to have originated in the medieval period as part of an open-field system, subsequently divided into fields that pre-date the formal enclosure process of the 18th to mid-19th century. There are no historic boundaries within the site, which comprises a single coherent land parcel. A cursory inspection of modern aerial photographs does not indicate any relict elements of the open field system, but this does not preclude these existing, either as faint earthwork elements or as below-ground archaeology.
- 4.33 The relevant part of the HEA recommendations for KVHECZ 2 are therefore as follow:
- “Should land within the zone be allocated ... any proposed development should seek to complement the low settlement density and the conservation and fabric and legibility of the historic landscape character ... Any such development should also be designed to enhance the local vernacular in terms of its scale and architectural form.”*
- 4.34 KVHECZ 3 is dominated by the built environment, which essentially comprises the modern extent of Dunsley. The small parcel of open ground within the site that is included in this character area therefore, appears slightly anomalous. The recommendations made by the HEA for KVHECZ 3 largely apply to the preservation of the small number of historic buildings and their settings. These do not apply to the site.

5. Conclusion

- 5.1 As described in the baseline section of this Appraisal, development of the site would not physically affect any scheduled monument or listed building, nor would any scheduled monument or listed building's setting be affected.



- 5.2 In terms of CAs, the site is outside the boundaries of those designated for both Kinver and the Staffordshire and Worcestershire Canal. The actions within the Kinver Management Plan which solely concern development within the CA therefore do not apply. On the other hand, those which concern protection of the broad landscape views that include the CA are relevant. However, as discussed above, the site is in an appropriate location in respect of the CA, while its placement and design are not in conflict with the actions set out in section 3.2 of its Management Plan. The same comments apply to the Canal CA.
- 5.3 No known, non-designated heritage asset would be physically affected by development of the site, nor would the setting of any be likely to be significantly affected.
- 5.4 In the light of the above, the development of the site would not result in any heritage asset being subject to 'substantial harm' as defined by NPPF, while the development as a whole would not be in conflict with relevant heritage legislation or policy.
- 5.5 As such, there is no reason why, in terms of effects on the historic environment, the site should not be promoted for future development.

Appendix 4: EDP Dunsley Drive Heritage Appraisal

Land at Dunsley Drive, Kinver, Staffordshire

Heritage Appraisal

edp4711_r006

1. Introduction

1.1 This Heritage Appraisal provides a preliminary appraisal of the Dunsley Drive site at Kinver, Staffordshire, the aim of which is to inform the early consideration of its design and promotion in the planning process. This Heritage Appraisal has been informed by a desk-based review of data relating to heritage assets and is supported by a visit to the site and its immediate environs. This Heritage Appraisal should be read in conjunction with the preliminary Landscape and Visual Appraisal (LVA), which sets out the character of the site and establishes, in basic terms, its visual envelope.

2. Site Description

2.1 The site is to the east of the village of Kinver, South Staffordshire. It is approximately 1.16 hectares (ha) and comprises agricultural land which gently slopes from east to west. It is bounded to the north, south and west by existing residential development and open agricultural land to the east. The site's western boundary is formed of an existing hedgerow interspersed with trees, beyond which lies Dunsley Drive, from which the site will gain 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 trees and hedgerow planting.

2.2 The LVA establishes that the topography of the Local landscape results in a relatively limited visual envelope. To the east, intermittent views of the site are available from the immediately adjacent fields, but not further than the ridgeline c.200m distant. To the west, north and south, the existing residential development on the Dunsley Drive screens the site from any short or mid-distance views (i.e. from Dunsley Road or beyond). The tree belts to the south/south-east of the site are an additional screening element within the Local landscape, particularly in terms of blocking views to/from the Kinver Conservation Area (CA) and in the direction of the canal.

2.3 There are no views of the historic core of the settlement of Kinver, but there is intervisibility with Kinver Edge, c.1km to the south-west. As described below, Kinver Edge and the heritage sites located there (notably the church, Rock Houses and Iron Age Hillfort) have panoramic views to the north and north-east, over the village of Kinver and the landscape beyond.

3. Legislation and Policy Review

National Planning Policy Framework

- 3.1 The National Planning Policy Framework (NPPF) sets out the government's approach to the Conservation and Management of the historic environment, including both listed buildings and CAs, through the planning process (Section 16). The opening paragraph 184, recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Subsequent paragraphs stress the desirability of preserving heritage assets and applies a test of 'substantial' or 'less than substantial' harm for those assets which are affected by development.

Legislation

- 3.2 The relevant legislation concerning the treatment of scheduled monuments is the *Ancient Monuments and Archaeological Areas Act 1979*. This act details the designation, care, and management of scheduled monuments, as well as detailing the procedures needed to obtain permission for works which would directly impact upon their preservation. The act does not confer any statutory protection on the setting of scheduled monuments although this is considered as a policy matter in Paragraph 193 of the NPPF.
- 3.3 Sections 66(1) and 72(1) of the (*Planning Listed Buildings and Conservation Areas Act 1990*) set out the duties of Local Planning Authorities (LPAs) in respect of the treatment of listed buildings and CAs through the planning process. Section 66(1) of the 1990 Act sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting. In respect of CAs, Section 72(1) of the 1990 Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

South Staffordshire Local Plan

- 3.4 The South Staffordshire Local Plan contains a range of policies and land allocations and is made up of the Core Strategy and Site Allocations Document (SAD). These replace the 1996 Local Plan and together deliver the Local Planning Strategy for South Staffordshire. The Core Strategy was adopted in 2012 and the SAD in September 2018.
- 3.5 Under Environmental Quality, Strategic Objective 5 is as follows: "*To protect, conserve and enhance the historic environment and heritage assets and ensure that the character and appearance of the District's Conservation Areas is sustained and enhanced through management plans and high-quality design.*"
- 3.6 Within Core Policy 2 (Protecting and Enhancing the Natural and Historic Environment), the salient policy is EQ3: "*Conservation, Preservation and Protection of Heritage Assets.*" This

sets out a number of means by which the preservation of South Staffordshire's historic environment will be achieved. Those relevant to this Appraisal are as follow:

- c. *"The Council will ensure that development which affects a heritage asset or its setting will be informed by a proportionate assessment of the significance of the asset, including its setting, which is likely to be affected by the proposals. These will be judged by considering the extent to which an asset's archaeological, architectural, historic or artistic interest will be harmed, including its conservation, in the interest of present and future generations.*
- d. *In the case of development in a conservation area, proposals will be considered against any management plan and appraisal adopted for that area.*

Development proposals should be consistent with the NPPF, the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions) and other local planning policies."

Kinver Conservation Area Management Plan (2011)

3.7 Most of the Management Plan concerns the boundary and buffer of the CA, and development within this defined zone. As such, these do not apply to the proposed development of the site. However, section 3.2 concerns the protection of the broader landscape setting and views and are therefore relevant to this Appraisal. The management plan states that:

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4. Heritage Baseline

4.1 The site does not contain any 'designated heritage assets' (as defined in Annex 2 of the NPPF), nor is it located (either wholly or in part) within the boundary of such an asset. As such, there are no 'in principle' heritage constraints to the delivery of the site for development, or in respect of its capacity to accommodate development.



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- 4.18 There is little intervisibility between the site and the adjacent parts of the CA. Dunsley House and the properties at the southern end of Dunsley Drive (West Point House, Elsfield) block much of the view, while the woodland within 100m of the site boundary precludes views further into, or outwards from, the CA. The 'positive views' in this locality identified by the Conservation Management Plan's Townscape Appraisal map, including that northwards from the canal, will not be altered. These comments are reiterated below in respect of the Staffordshire and Worcestershire Canal CA.
- 4.19 Where the more elevated parts of the CA are concerned (i.e. Kinver Edge) the same comments apply as for the church – namely that the site is visible as a small open area immediately beyond the modern urban fringe. It contributes to the setting of the CA to the same extent as other agricultural land on its margins, but its development for housing will bring minimal change.
- 4.20 Given the importance afforded to the 'green' and open spaces within the CA set out by the Management Plan, it is obvious that future residential growth should be focused away from this designated heritage asset, in order to avoid or minimise harm to its character and appearance. As set out above, in physical terms the proposed development of the site will achieve this aim, avoiding land-take within the CA boundary. Equally, development here will not significantly affect the visual setting of the CA, bringing only negligible changes in views from relatively distant viewpoints on Kinver Edge.

Staffordshire and Worcestershire Canal Conservation Area

- 4.21 The Staffordshire and Worcestershire Canal passes to the east of Kinver. Where it falls within the Kinver CA, it is not separately designated. To the south and north-east (i.e. beyond the Kinver CA boundary), the canal is afforded its own separate CA designation.
- 4.22 To the south of the site, the canal comes within 190m of the site, before turning to follow a sinuous course west. It then turns north and north-east, such that it wraps around the north of the site, at a closest distance of c.300m.
- 4.23 To the north, the site and the canal CA are separated by the existing housing estates on the north side of Dunsley Road. There would be no intervisibility between the site and CA in this direction, while intervisibility with the canal further to the north-east are also precluded by housing and the natural landform. On the south/south-west side, the comprehensive

screening effect of Dunsley House, the modern housing on Dunsley Drive and of woodland on the canal fringe is as described above for the Kinver CA.

- 4.24 In physical terms, therefore, the proposed development will have no effect on the special interest of the CA for the canal. In setting terms, it will bring no change to the canal's visual environment. It will, however, contribute in a small way to the general cumulative effect of modern development, in which the canal's originally rural course to the east of Kinver, well-separated from the town, now contains more suburban elements. Despite this, no significant impact on the CAs character and appearance is predicted.

Kinver Camp Iron Age Hillfort (NHLE Ref. 1015432)

- 4.25 This scheduled monument is situated at the north-west corner and highest point of the Kinver escarpment, on the south-west outskirts of Kinver village. It includes the earthwork and buried remains of a univallate Iron Age fort. The Hillfort's earthworks are sub-rectangular in plan with external dimensions of c.210m by 300m, enclosing an area of approximately 3.75ha.
- 4.26 In respect of its setting, the Hillfort's position on the Kinver escarpment is critical to an understanding of its function, intended both as a defensive site and also one which dominated the surrounding landscape. The earthworks have intrinsic visual interest, whilst from Kinver and its environs the site of the fort is a prominent landmark.
- 4.27 The site lies 2.5km east of the scheduled monument. The summit location of the Hillfort must once have afforded it broad landscape views in all directions, but the mature woodland on its west and north sides now mean that its primary vistas are now to the south and east, only becoming partially open in other directions during winter. The site does not make a positive contribution to the monument's setting. Its development for housing will bring negligible visual change, if any, and will not affect the setting of, or views from, the monument.

Kinver Edge Rock Houses

- 4.28 This non-designated asset comprises a series of six houses cut into the cliffs at Holy Austin Rock (Staffordshire Historic Environment Record Ref. MST 1158). These are of possible 17th century date, although the name may indicate that the dwellings were occupied as a hermitage prior to the Reformation. The houses were inhabited as domestic dwellings until the mid-20th century. The core element of their setting is, self-evidently, Kinver Edge, of which these houses are an integral part. The village below provides their broader context.
- 4.29 The Rock Houses and the site are separated by 2.5km. As with the Hillfort, the site is visible but is an inconsequential element in the view and does not make a positive contribution to the setting of this asset. Views of and including the Rock Houses are southward-looking, obtained from Compton Road and the adjacent woodland, and do not include the site. If developed for housing, the site will appear as a very minor extension of the 20th century

housing estates that extend in this direction. The significance of these assets will be unaffected.

South Staffordshire Historic Environment Assessment

- 4.30 The Historic Environment Assessment (HEA) divides South Staffordshire into 13 project areas and aims to establish the potential for the historic environment of each to absorb new development and housing in particular. This has been carried out by dividing each of the project areas into 'Historic Environment Character Zones' (HECZs) and assessing the significance of the heritage assets of each zone.
- 4.31 The site falls within two Kinver (KV) project areas: the greater part within character area KVHECZ 2 – East of Kinver and Dunsley, with the small fenced enclosure in the north of the site within KVHECZ 3 – Dunsley (HEA, Appendix 4).
- 4.32 KVHECZ 2 (including the site) is almost entirely characterised by a landscape created by piecemeal enclosure. This is suggested to have originated in the medieval period as part of an open-field system, subsequently divided into fields that pre-date the formal enclosure process of the 18th to mid-19th century. There are no historic boundaries within the site, which comprises a single coherent land parcel. A cursory inspection of modern aerial photographs does not indicate any relict elements of the open field system, but this does not preclude these existing, either as faint earthwork elements or as below-ground archaeology.
- 4.33 The relevant part of the HEA recommendations for KVHECZ 2 are therefore as follow:
- “Should land within the zone be allocated ... any proposed development should seek to complement the low settlement density and the conservation and fabric and legibility of the historic landscape character ... Any such development should also be designed to enhance the local vernacular in terms of its scale and architectural form.”*
- 4.34 KVHECZ 3 is dominated by the built environment, which essentially comprises the modern extent of Dunsley. The small parcel of open ground within the site that is included in this character area therefore, appears slightly anomalous. The recommendations made by the HEA for KVHECZ 3 largely apply to the preservation of the small number of historic buildings and their settings. These do not apply to the site.

5. Conclusion

- 5.1 As described in the baseline section of this Appraisal, development of the site would not physically affect any scheduled monument or listed building, nor would any scheduled monument or listed building's setting be affected.



- 5.2 In terms of CAs, the site is outside the boundaries of those designated for both Kinver and the Staffordshire and Worcestershire Canal. The actions within the Kinver Management Plan which solely concern development within the CA therefore do not apply. On the other hand, those which concern protection of the broad landscape views that include the CA are relevant. However, as discussed above, the site is in an appropriate location in respect of the CA, while its placement and design are not in conflict with the actions set out in section 3.2 of its Management Plan. The same comments apply to the Canal CA.
- 5.3 No known, non-designated heritage asset would be physically affected by development of the site, nor would the setting of any be likely to be significantly affected.
- 5.4 In the light of the above, the development of the site would not result in any heritage asset being subject to 'substantial harm' as defined by NPPF, while the development as a whole would not be in conflict with relevant heritage legislation or policy.
- 5.5 As such, there is no reason why, in terms of effects on the historic environment, the site should not be promoted for future development.

**Appendix 5: EDP Dunsley Drive Landscape
Position Paper**

Land off Dunsley Drive, Kinver, Staffordshire

Landscape Position Paper

edp4711_r007

1. Introduction, Purpose and Approach

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Bellway Homes ('the promotor') to prepare a Landscape Position Paper, which examines the prospect of future development on Land off Dunsley Drive, Kinver, Staffordshire ('the site').
- 1.2 The site is situated in Staffordshire, within the administrative area of South Staffordshire District Council, which acts as the statutory planning authority. South Staffordshire District Council has commenced a District Plan Review to identify land to accommodate the remainder of the adopted South Staffordshire District Plan (SSDP) housing requirement.
- 1.3 This Landscape Position Paper provides a preliminary appraisal of the site to inform the early consideration of its design and its promotion in the planning process. The Position Paper has been informed by a desk-based review of available data, policy, landscape character publications and mapping and by a site visit undertaken by an experienced Chartered Landscape Architect during early December 2019.
- 1.4 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The Practice operates throughout the UK from offices in Cirencester, Cardiff, Cheltenham and Shrewsbury. Details can be obtained at (www.edp-uk.co.uk).

2. Site Location and Site Description

- 2.1 The existing site comprises a parcel of land roughly triangular in shape. The site is located at Ordnance Survey Grid Reference (OSGR): SO 85195 83756 (centre of the site).
- 2.2 The site is within the West Midlands Green Belt. However, there are no National or Local landscape designations situated within or adjoining the quantum of the site.
- 2.3 The site lies to the immediate east of Dunsley Drive, on the eastern side of the village and has a predominantly western aspect with the south-eastern side edge sloping to the north-western corner, see **Image EDP 2.1** overleaf.



Image EDP 2.1: View from within the site looking south-easterly across rising landform. Photograph taken at OSGR: SO 85202 83807 (during December 2019)

- 2.4 The site is made up of two interconnecting fields, both of which are managed for equestrian grazing. There is a single-storey equestrian stable type building in the north-western corner of the site, with an existing gated access at this boundary from Dunsley Drive, see **Image EDP 2.2** below.



Image EDP 2.2: View from within the site looking north-west to an existing stable block on the northern site boundary. Photograph taken at OSGR: SO 85207 83828 (during December 2019)

2.5 The site is bounded:

- To the north, the site is bounded by existing two-storey residential dwellings situated off an associated private amenity space. These dwellings are accessed off Dunsley Drive and are arranged oblique to the site (looking east to west). The private amenity space is enclosed by low timber post and wire fencing with occasional trees, see **Image EDP 2.3** below;
- The eastern edge of the site is defined by a timber post and wire fence, beyond which there is an open pastoral field. Landform gently rises to the east to a landform, beyond which there is no visibility as landform drops away to the north-east towards the Kidderminster/Wolverhampton Road (A449). A number of existing residential dwellings arranged in a complex, are discernible from the site, see **Image EDP 2.4** overleaf;
- To the south, the site is bounded by an existing timber post and wire fence, with a private driveway and a collection of existing residential dwellings set with private amenity space with mature landscape features, see **Image EDP 2.5** overleaf; and
- The western site boundary is bounded by a timber post and wire fence, beyond which is a private driveway leading a number of two-storey residential dwellings set within private amenity space with mature landscape features. The north-western edge of the site is enclosed by Dunsley Drive, public roadway and with two-storey residential dwellings beyond, see **Image EDP 2.6** overleaf. The site is situated above the level of Dunsley Drive, which in places is approximately 1.25m overall.



Image EDP 2.3: View from within the site looking north towards the adjoining dwelling situated on Dunsley Drive. Photograph taken at OSGR: SO 85202 83807 (during December 2019)



Image EDP 2.4: View from within the site looking north-east towards the existing residential dwellings arranged in a complex. These dwellings are accessed from Dunsley Road. Photograph taken at OSGR: SO 85202 83807 (during December 2019)



Image EDP 2.5: View from within the site looking south towards the existing residential dwellings situated off a private drive from Dunsley Drive. Photograph taken at OSGR: SO 85202 83807 (during December 2019)



Image EDP 2.6: View from within the site looking north-west along the private driveway which encloses the western site boundary, with existing residential dwellings situated off. N.B. Many of these dwellings are two-storey and the Finished Floor Level (FFL) is below the ground level of the site. Photograph taken at OSGR: SO 85187 83703 (during December 2019)

2.6 There is no public access available to the site and no Public Rights of Way (PRoW) which pass through the quantum of the site. PRoW Public Footpath Kinver 94 is situated outside of the site, immediate to its southern boundary see **Image EDP 2.7** and **2.8**. However, there are no themed, promoted or long-distance walking routes which pass the site within its immediate environment.

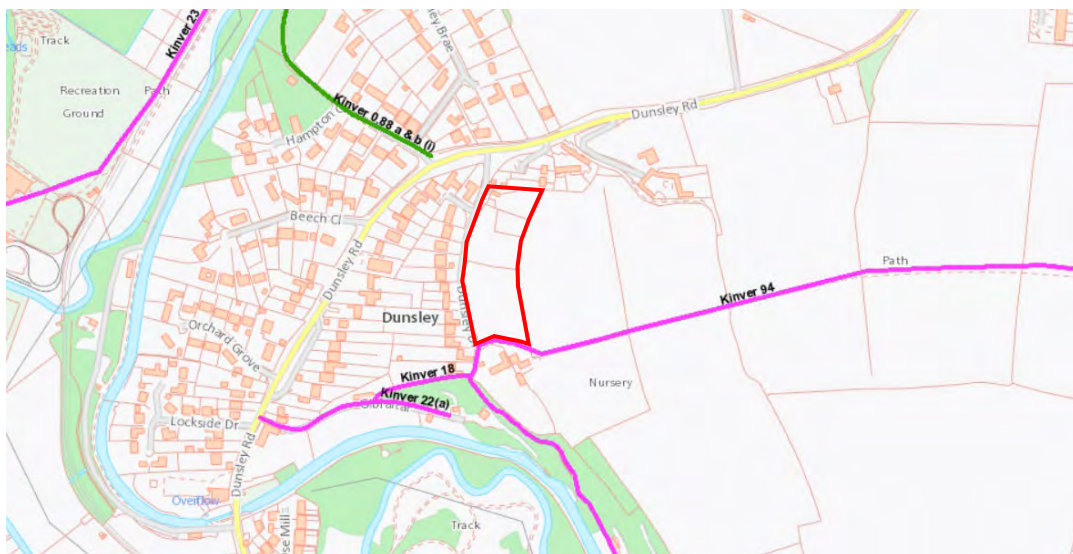


Image EDP 2.7: Extract from the Staffordshire County Council's online Countryside Access and PRoW Map. N.B. EDP has highlighted the site with a solid red line



Image EDP 2.8: View from outside of the site looking north-east from PRow (Public Footpath 94). Photograph taken at OSGR: SO 85187 83703 (during December 2019)

- 2.7 Overall, the site does not demonstrate any landscape features worthy of absolute protection and retention other than the trees/hedges at its boundaries, many of which would benefit from improved management. The site's topography is an interesting characteristic and could inform the layout of any future development.

3. Landscape Character

- 3.1 The site is situated within a landscape that has been characterised at National and County level. At National level, the site is located within National Character Area (NCA) 66: Mid Severn Sandstone Plateau, see **Image EDP 3.1** overleaf.

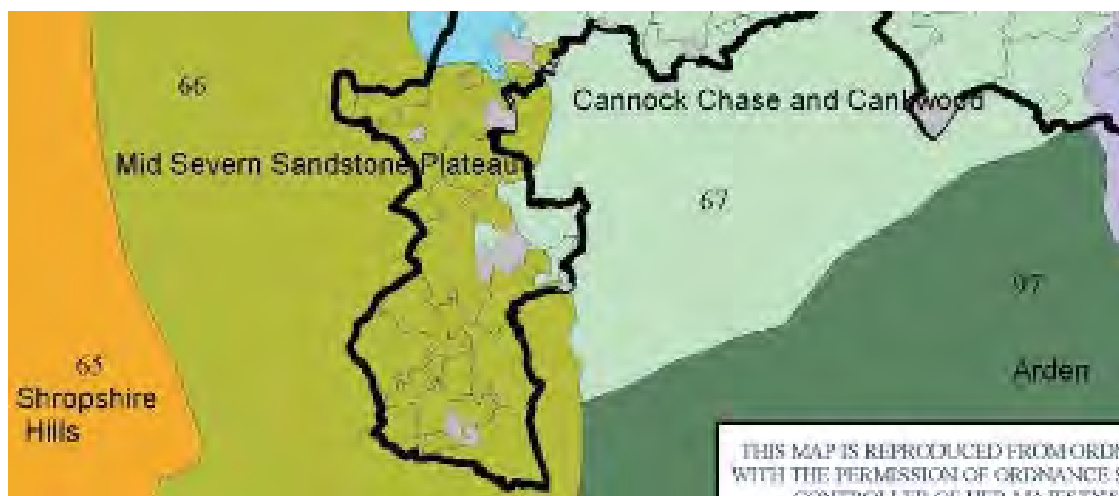


Image EDP 3.1: Extract from Map 2 of the Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011'

3.2 The County-wide landscape character assessment comprises the 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011', which remains current at the time of writing this Landscape Position Paper. The County Council find the site within the Sandstone Estatelands Landscape Character Area, see **Image EDP 3.2** below.

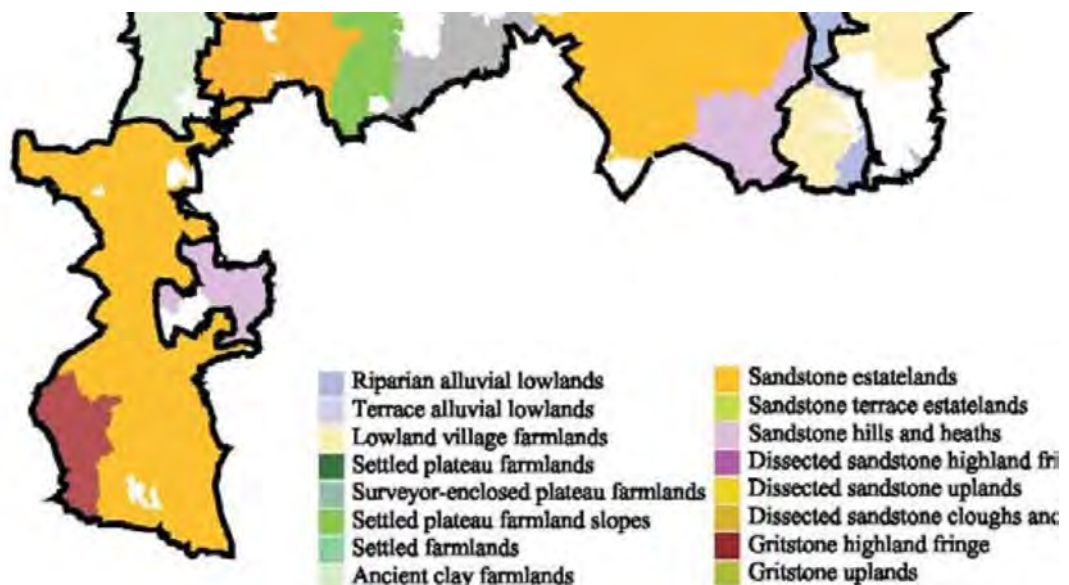


Image EDP 3.2: Extract from Map 4 of the Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011'. N.B. The site is situated within the Sandstone Estatelands Landscape Character Area

3.3 The character of the Sandstone Estatelands Landscape Character Area is described as follows:



“The woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type...Settlement is sparse, and characterised by expanded hamlets and wayside cottages...This is a landscape that appears far more wooded than it actually is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places. The slopes in turn give way to well-treed valleys...”

3.4 The County Council continue:

“Villages are expanding with the increase in commuter dwellings and small lanes show the obvious signs of becoming well used rat-runs. Where farmland abuts the conurbation the landscape reflects this influence, hedgerow deterioration being more evident and horsey culture becoming frequent.”

3.5 The County Council’s assessment notes, the following landscape features common to this landscape character area. EDP notes the underlined as common to the site and its immediate setting:

- *“Estate Plantations;*
- *Heathy ridge woodlands;*
- *Hedgerow oaks;*
- *Well tree’d stream valleys;*
- *Smooth rolling landform with scarp slopes;*
- *Red brick farmsteads and estate cottages;*
- *Mixed intensive arable and pasture farming;*
- *Large hedged fields;*
- *Halls and associated parkland; and*
- *Canal.”*

3.6 Further to this, under the heading of ‘Incongruous Landscape Features’, the County Council raises the following points relative to this landscape character area. EDP notes the underlined as common to the site and its immediate setting:

- *“Power lines;*
- *Village expansion;*



- *Urban edge;*
- *Modern farm buildings;*
- *Deteriorating hedgerows;*
- *Commuter dwellings; and*
- *Busy roads.*

3.7 Naturally, the degrading effect of such factors vary across the Sandstone Estatelands landscape character area with such factors, as aforementioned, having a greater or lesser effect on the intactness of the landscape character. In their assessment, the County Council asserts that the “*landscape character type is locally sensitive to the impacts of development and land use change.*”

3.8 A site visit was undertaken by a Chartered Landscape Architect during December 2019, at which, the character of the site was appraised. With reference to the key characteristics listed (above) for the Sandstone Estatelands landscape character area, this review found that there are a number of key differences within the site, including:

- No representation of “*...Estate Plantation*”, which is more reflective of land practice further north of the site within the wider open countryside beyond nearby estate plantations associated with the Enville and Stallybridge Estate (i.e. ‘The Million woodland’). There is a small parkland remnant around Dunsley Hall, off Dunsley Road which is approximately 0.75km north-east of the site. Consequently, the presence of “*Halls and associated parkland*” are outlying to Kinver and not within the environment of the site:
- No representation of “*...Commuter dwellings and urban edge*”, albeit, the site is situated on the village edge adjacent to well established modern development (latter half of the 20th century). Dunsley Drive is a quiet residential road, leading to Dunsley Road. Whilst traffic on Dunsley Drive is infrequent and Dunsley Road is one of a number of routes into Kinver;
- No representation of “*large hedged fields*” with the site situated in a field pattern of small to medium scale and hedgerows are commonly gappy in this location through either age, being outgrown or degraded or previously removed. The site is predominantly enclosed by timber post and wire fencing, with the probability of previous hedgerow extraction within the site;
- No representation of “*Red brick farmsteads and estate cottages*” as the site does not contain development, and that development surrounding the site is modern day, ‘sub-urban’ style built form; and



- No representation of “*well tree’d stream valleys*” at the site, or within its vicinity. Albeit, these features can be found in the wider landscape area.

3.9 EDP considers that the site makes only a limited contribution to the key characteristics of the landscape of the Sandstone Estatelands. Additionally, there are a number of landscape detractors discernible from the site. These detractors are predominantly associated with the position of the site on the village edge of Kinver and the perception of existing residential development from within the site, see **Section 2, Image EDP 2.3** and **Image EDP 2.4** above.

4. Visual Amenity

4.1 The site’s location to the eastern side of the village, adjacent to well established modern development (latter half of the 20th century) to the west means that it has the potential to integrate well with the existing settlement when seen in wider views. During the site visit, the Zone of Visual Influence of the site (i.e. those areas of the surrounding landscape which had potential views of the site) was established and then these areas were visited to establish whether ground level views were accessible and if so, how the site appeared.

4.2 **Image EDP 4.1** overleaf, illustrates the location of PRoW within the wider environment of Kinver and the open countryside which surrounds the village. This extract from Staffordshire County Council’s PRoW map demonstrates that PRoW are found to the east (Public Footpath Kinver 94) which progresses through open countryside away from the site on the settlement edge.

4.3 The route for Public Footpath 18 (adjoining the southern site edge and to the south-west) progresses through existing dwellings within the urban setting. Public Footpath 22a and 22b lead down to Staffordshire and Worcestershire canal (south of the site) and so are situated within a valley’d landscape that is well tree’d.

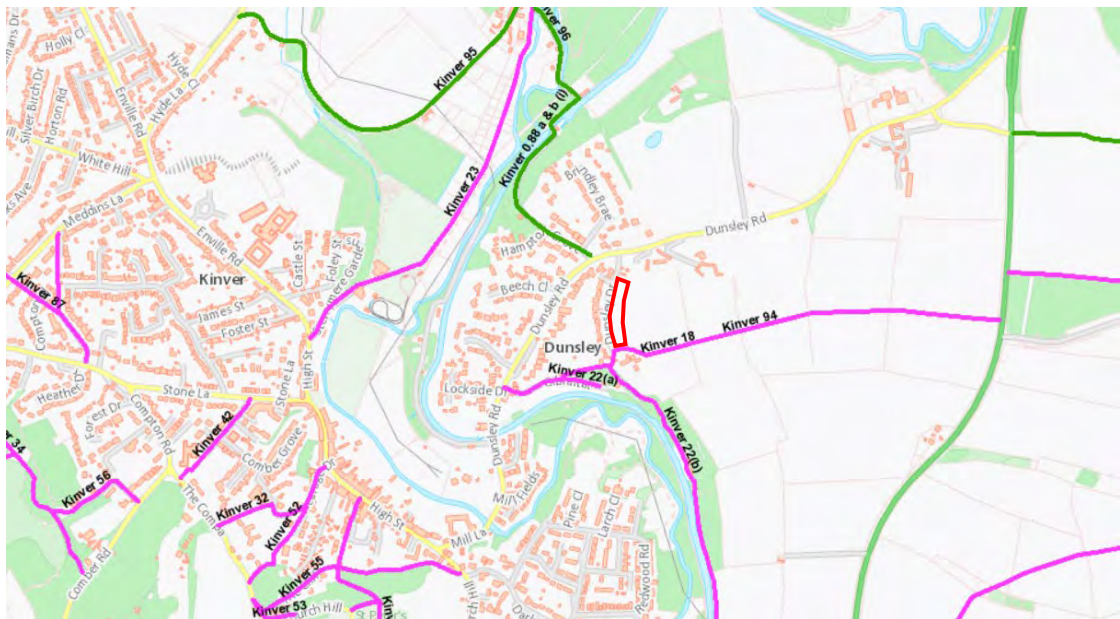


Image EDP 4.1: Extract from the Staffordshire County Council's online Countryside Access and PRow Map. N.B. EDP has highlighted the site with a solid red line

4.4 The broad extent of the view available from each of these areas is described below:

- To the north, the site is enclosed by the existing residential dwellings adjoining the site, and the combination of landform adjoining the site and the verge of Dunsley Drive and mature landscape features within private amenity space, see **Image EDP 4.2** below and **Section 2, Image EDP 2.6** above.



Image EDP 4.2: View from outside of the site looking south down Dunsley Drive towards the western site boundary. Photograph taken at OSGR: SO 85192 83866 (during December 2019)



- To the east, landform rises toward a Local ridgeline, beyond which landform falls easterly away towards the Kidderminster/Wolverhampton Road (A449), see **Section 2, Image EDP 2.4** and **Image EDP 2.8**. There are a small number of residential dwellings to the north-east which overlook the site. In the wider landscape, any vantage point for seeing the site would be well over 1km east;
- To the south, the site is overlooked a small collection of residential dwellings, with the PRoW Public Footpath 94 and 18 passing the site, see **Section 2, Image 2.5** and **Image EDP 2.8** above. Views from these Public Footpaths are already influenced by the settlement edge location. Beyond this, views of the site are substantially filtered, if not screened, by existing built form and mature landscape features;
- To the west, the site is bounded by either a public roadway or private driveway, with residential dwellings situated on, see **Section 2, Image EDP 2.6** above; and
- There is a network of PRoW situated south and south-west of the site on elevated landform above the village. With the greatest degree of elevation above the village these routes, including those around Holy Austin Rock and St Peter's Church, provide expansive panoramic views over the village and the landscape beyond. Within views towards the site from this the junction of Public Footpath 54 and 89 (see **Image EDP 4.3** below) the site appears well integrated with the existing settlement, with existing, long established development to either side (on Dunsley Drive), and development beyond the site (off Dunsley Drive). The site appears to be on the existing edge of the settlement but situated adjoining existing development and not situated on a prominent ridgeline where development may appear detached from the village and incongruous.



Image EDP 4.3: View from Public Footpath 54 and 89 on elevated landform around St Peter's Church, approximately 0.8km south-west of the site (at its closest point). Photograph taken at OSGR: SO 84711 83068 (during December 2019)

- From the residential properties situated off Dunsley Drive (primarily) and north-east of the site off Dunsley Road (see **Section 2** above), it is clear that these dwellings have advantage of the view over the site to the countryside beyond with several having 'picture windows' to enjoy this aspect. Though such views are not protected in planning policy terms, the design of any scheme here would benefit from being sensitive to these adjacent residents, ensuring their residential amenity is not significantly degraded.

5. Landscape Sensitivity

- 5.1 In July 2019, South Staffordshire District Council published their 'South Staffordshire Landscape Sensitivity Assessment' (Final Report). This assessment forms an important evidence base for the preparation of the South Staffordshire Local Plan.
- 5.2 The purpose of this study was to provide an assessment as to the extent of which 'the character and quality of landscape abutting is in principle susceptible to change as a result of introducing new built form.'
- 5.3 This study specifically considers new residential development. The settlement of Kinver is defined by this study as a 'Main Service Village' and therefore, a Tier 4 settlement in this study.

- 5.4 In terms of scope, this study considers the landscape sensitivity of land within the West Midlands Green Belt which is: *“immediately adjacent to selected South Staffordshire settlements (Tier 1-4 settlements) ... encompassing locations identified through the South Staffordshire ‘Call for Sites’ exercises, and land adjacent without promoted sites.”*
- 5.5 South Staffordshire District Council define landscape sensitivity as: *“the relative extent to which the character and quality of an area (including its vital attributes) is likely to change as a result of introducing a particular type of development.”*
- 5.6 This study appraises parcels of land, some of which are large and expansive tracts of land, the study includes the site within a wider parcel of land (identified by the South Staffordshire District Council as SL2), see **Image EDP 5.1**.

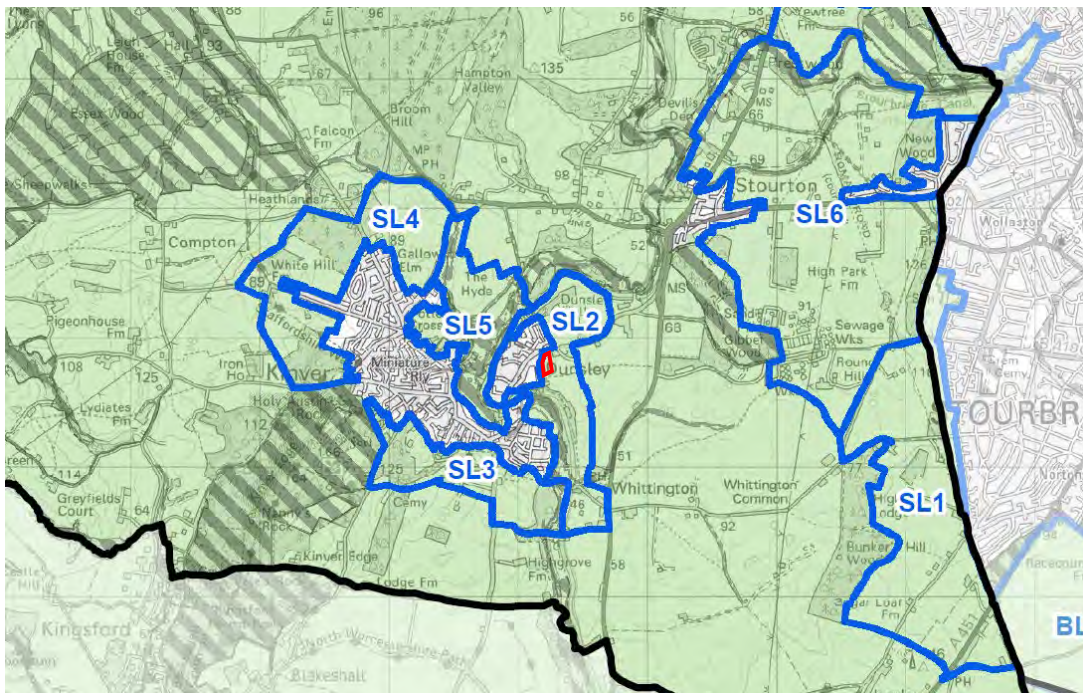


Image EDP 5.1: Extract from the South Staffordshire District Council’s South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019). N.B. EDP has highlighted the site with a solid red line

- 5.7 With reference to Table 4.1 of the South Staffordshire District Councils, South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019), the land parcel SL2 has an overall quantum of nearly 75ha, of which the site is less than 2ha and so is less than 2.5% of the overall land parcel. Staffordshire District Council assess land parcel SL2 as having an overall landscape sensitivity of Moderate – High.
- 5.8 With Chapter 3 of South Staffordshire District Councils, South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019), the rating of Moderate – High is not defined specifically by South Staffordshire District Council. Instead, the South Staffordshire



District Council directly defines only Low, Moderate and High. None the less, the South Staffordshire District Council consider that the land parcel has a relatively high landscape sensitivity and susceptibility to change, as this land parcel having some distinct, if not strong, character and qualities.

5.9 With consideration of the published methodology for this study and our own field-based assessment during December 2019, EDP considers that a site-specific assessment of the site would most definitely yield a lower landscape sensitivity than the wider land parcel, for the following reasons:

- The site has very limited features of value with previously extracted hedgerows replaced with timber post and wire fencing, limited native tree cover and poorly managed internal vegetation. The site's topography is probably the most interesting aspect. Consequently, the site makes a very limited, if any contribution to the key characteristics of the landscape of the Sandstone Estatelands; and
- There are a number of landscape detractors discernible from the site, which are predominantly associated with the position of the site on the village edge of Kinver. The perception of existing residential development enclosing the site to the north, south and western edges, which in some situations, overlooks the site's interior.

5.10 Landform continues to rise eastwards from the site towards a Local ridgeline, which is situated within open countryside beyond the village settlement and within the typical 'mixed intensive arable and pasture farmland' common to the Sandstone Estatelands landscape character area, see **Image EDP 5.2** below, as well as **Section 2, Image EDP 2.4** and **Image EDP 2.8** above.



Image EDP 5.2: View from within the site looking east towards the ridgeline outside of the site, beyond which landform falls easterly downwards to the Kidderminster/Wolverhampton Road A449). Photograph taken at OSGR: SO 85187 83703 (during December 2019)

- 5.11 The combination of this Local ridgeline, the settlement edge and roadway enclose the site and act as physical constraints. Consequently, the site is within these features which limit and contain the site. The site is experienced as being within the settlement edge of Kinver, and its domestic land use and character. When on site, especially in winter, one is aware of the presence of the surrounding village related land use, albeit, on the edge of the village rather feeling divorced from it, in the open countryside, like aspects of the wider land parcel SL2.
- 5.12 From a landscape and village character perspective, the domestic curtilages discernible from the site most definitely contribute to the perception of the site as village edge (see **Section 2, Images 2.3, 2.5 and 2.6** above).
- 5.13 The wider land parcel SL2 is situated further out to the village and through its combination of elevated landform and mature woodland blocks along the course of the canal and around Horse Bridge Lane. The site is more related to the settlement edge than the wider open countryside of the land parcel. Hence, the wider land parcel is experienced as divorced and poorly related to Kinver.
- 5.14 EDP considers that residential development in the wider land parcel SL2 would be subject to a greater landscape sensitivity than those areas on the periphery of Kinver, such as the site. Consequently, given the above factors, EDP would most definitely conclude that the site has only a Moderate landscape sensitivity at most.



6. Implications for Masterplanning

6.1 Any future development of the site should be informed by a Landscape and Visual Impact Assessment, the findings of which should help shape the scheme design. At this early stage, the preliminary landscape and visual appraisal has identified a series of key principles for the design of future development, which would assist in mitigating its landscape and visual effects and ensure it integrates effectively with the existing village form. These are:

- The existing external field boundaries to the site are weak, presenting an opportunity to establish new native hedgerows with tree planting and strengthen the landscape fabric of the site;
- The site will drain naturally to the western edge, with the north-eastern corner being the lowest point. On this basis, the western edge of the site should be utilised for sustainable drainage attenuation features designed as attractive landscape components. This initiative has the potential to provide an attractive focal point in this part of the village, set within a compact 'village green' style open space. This would help connect the new development with the existing settlement;
- The layout of the site should seek to work with and reflect the site topography;
- There is an opportunity to create a central route which capitalizes new landscape fabric to aid the 'sense of place' of the development;
- Existing dwellings to the northern edge (situated off Dunsley Lane) should be 'backed' with new development, but length of garden and height of building should be carefully considered to try to mitigate effects on residential views and amenity;
- Development should be stepped back from the southern boundary and carefully considered to try to mitigate effects on residential views and amenity on neighbouring dwellings; and
- Architectural proposals should seek to reflect the vernacular of the older parts of the village.

7. Conclusions

7.1 The site to the east of Dunsley Drive, Kinver lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed. In elevated views from Holy Austin Rock, to the south of the village, the site is not seen. However, might the proposal be discernible from elevated landform at Kinver Edge, the site appears to be on the existing edge of the settlement, but



situated adjoining existing development and not situated on a prominent ridgeline, where development may appear detached from the village and incongruous.

7.2 Furthermore, as the site is sandwiched between existing development on the eastern edge of Dunsley Drive and inside, and below topographically, the extent of ribbon development along Dunsley Road, the development of the site would avoid any perception of 'sprawl' into the countryside beyond.

7.3 The following main matters have been identified within this Position Paper and are summarised below.

Relevant Designations:

- The site is situated within West Midlands Green Belt however, the site does not lie within, or adjoin any Nationally or Locally designated landscape; and
- Whilst there are a number of PRoW within the wider open countryside and adjoining the southern site edge, there is no public access into the site.

Visual Amenity:

- Visually, the site is enclosed through the combination of landform and mature landscape features in the open countryside surrounding the site. Additionally, the adjoining residential development sandwich the site within built form, enclosing the site and limit direct views from the adjoining village settlement;
- Views of the site are limited to the immediate geographical area to the western and north-western edge of the site, with no long-distance views identified. In addition, there are limited views available from the Public Footpath Kinver 18 and 94 to the south-west of the site, which pass through open countryside. Furthermore, it is unlikely the development of the site is likely to be seen from Public Footpath 22a and 22b, which pass through a well tree'd valley landscape; and
- The site is overlooked by a number of residential dwellings, see **Section 2** above. These receptors are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity is protected however and, as such, the scheme design should be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high quality development in architectural terms.

Landscape Character:

- Heathy, wooded ridgeline, mature hedgerow oak trees within extensive hedgerows are characteristic of the landscape, but these features are not present within the site, or



its immediate setting. Therefore, there is an opportunity to strengthen local landscape character through new landscape planting, including new hedgerow and tree planting; and

- The site makes only a very limited contribution to the key characteristics of the landscape character area of the Sandstone Estatelands, with typical landscape features appearing more intact in the wider open countryside surrounding Kinver village.

7.4 Overall, this Position Paper has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.

7.5 The over-arching landscape strategy should look to integrate the site with Kinver, incorporating the existing trees and hedgerows and facilitating green infrastructure through the site, breaking up the mass of the development and offering new recreation links.

7.6 In conclusion, the site to the east of Dunsley Drive, Kinver, lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed.

7.7 Subject to these considerations, further technical studies and development of a well-designed masterplan and landscape strategy, there is no in-principle reason to prevent development of the site in landscape and visual terms. In conclusion, therefore, this preliminary appraisal has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.

Appendix 6: PJA Access Appraisal Technical Note

Technical Note

Project: Land at Dunsley Drive, Kinver

Subject: Access Appraisal

Client:	Bellway Homes Limited	Version:	C
Project No:	06024	Author:	DB
Date:	20/04/2022	Approved:	CS

I Introduction

I.1 Overview

1.1.1 PJA has been commissioned by Bellway Homes Limited to prepare a Transport and Access Appraisal to assess the potential residential development of land off Dunsley Drive, Kinver.

1.1.2 This note provides a review of the site's accessibility and identifies an access strategy.

I.2 Purpose of Report

1.2.1 The remainder of this document is structured as follows:

- Section 2 outlines the existing transport conditions;
- Section 3 details the proposed access strategy;
- Section 4 sets out the travel demand; and
- Section 5 summarises the key findings from the note.

I.3 Proposed Development

1.3.1 As noted above, the potential of the site for residential development has been considered. It is estimated that the site could accommodate approximately 35 dwellings and therefore the assessment in this Technical Note has been based on this quantum.

2 Baseline Conditions

2.1 Site Location

2.1.1 The site is located on the north-eastern edge of Kinver. It is bound by Dunsley Drive to the west, residential properties to the north and south and open fields to the east. The site location is presented in Figure 1.

Figure 1: Site Location



2.2 Local Highway Network

Dunsley Drive

2.2.1 Dunsley Drive is a quiet residential cul-de-sac, which measures 5.5m in width in the vicinity of the site and is subject to a 30mph speed limit. In the vicinity of the site, Dunsley Drive is unmarked, with a footway on the western side of the carriageway measuring 2m in width.

2.2.2 Dunsley Drive meets Dunsley Road via a simple priority junction, approximately 50m to the north of the site boundary.

Dunsley Road

2.2.3 Dunsley Road is a single-carriageway road which measures 7.8m in width. In the vicinity of the junction with Dunsley Drive, Dunsley Road is subject to national speed limit (60mph), which reduces to 30mph approximately 40m to the west of the Dunsley Drive / Dunsley Road junction.

2.2.4 There is a footway on the northern side of the carriageway measuring circa 1m in width, separated from the carriageway by a steep grass verge.

2.2.5 Dunsley Road runs from a priority junction with the A49 north-east of the site, to a priority junction with High Street and Church Hill in Kinver, to the south-west of the site.

2.3 Pedestrian and Cycle Infrastructure

Pedestrian Infrastructure

2.3.1 There is a footway on the western side of Dunsley Drive, which measures 2m in width. However, at present, this footway ends at the junction with Dunsley Road meaning there is no connection to the existing infrastructure on the northern side of the Dunsley Road carriageway. There is an unsurfaced footpath which connects Dunsley Drive to the southbound bus stop, east of the junction with Dunsley Road.

2.3.2 The footway on the northern side of Dunsley Road continues south-west, providing access to the northbound bus stop and to Kinver village centre. Alternatively, there is an unsurfaced public right of way which connects the southern end of Dunsley Drive to Dunsley Road in the vicinity of the Lockside Drive junction (Figure 2).

Cycling Infrastructure

2.3.3 There is no dedicated cycling infrastructure in the vicinity of the site. To the south of the site, the Staffordshire Canal towpath is suitable for cyclists (Figure 2). This route can be accessed by cycling 550m south on Dunsley Road and provides access to Kidderminster to the south via the River Stour.

Figure 2: Pedestrian and Cycle Infrastructure



2.4 Public Transport

Bus

2.4.1 The closest bus stops to the site are located on Dunsley Road. The stop for southbound services is located approximately 100m (one minute) walking distance from the site to the east of the Dunsley Road / Dunsley Drive junction. The stop for northbound services is located approximately 150m (two minutes) walking distance from the site, adjacent to the Dunsley Road / Hampton Grove junction.

2.4.2 The bus services accessible from these stops are summarised in Table 1.

Table 1: Bus Services

Service No.	Operator	Route	Weekday Hours of Operation	Weekday Frequency	Days of Operation
242	Select Bus Services	Stourbridge – Kinver via Wollaston, Stourton	10:23 – 17:28	1 per hour	Monday - Saturday
742	Select Bus Services	Stourbridge – Kinver High School	08:24 (southbound) 15:44 (northbound)	1 per day	Monday – Friday (school term time only)

2.4.3 Table 1 demonstrates that there is a regular bus service accessible from within a short walking distance of the site.

Rail

2.4.4 The closest railway station to the site is Stourbridge Junction, which is located 8km to the east of the site.

2.4.5 Stourbridge Junction is situated on the Birmingham to Worcester via Kidderminster Line which is served by West Midlands Railway trains. This station can be accessed by the 242 Bus from Dunsley Road, a journey time of approximately 21 minutes. The station offers services to Birmingham Snow Hill (at least every 20 minutes), Kidderminster (at least every 20 minutes) as well as Whitlock's End, Dorridge, Stratford-upon-Avon and Leamington Spa.

2.4.6 There are 90 cycle storage spaces and 797 car parking spaces available at Stourbridge Junction.

2.5 Accessibility

2.5.1 Guidance provided by the Institute of Highways and Transportation (IHT) in their publication 'Guidelines for Providing for Journeys on Foot' (2000) suggests that in terms of commuting, walking to school and recreational journeys; walk distances of up to 2,000m can be considered as a preferred maximum, with 'desirable' and 'acceptable' distances being 500m and 1,000m respectively. It should, however, be noted that journeys of a longer length are often undertaken.

2.5.2 For non-commuter journeys, the Guidance suggests that walk distances of up to 1,200m can be considered as a preferred maximum, with the 'desirable' and 'acceptable' distances being 400 and 800m respectively. Again, it should be noted that journeys of a longer length are often undertaken.

2.5.3 Assuming a typical walking speed of approximately 1.4m/s, Table 2 summarises the broad walk journey times that can fall under each category.

Table 2: IHT Walkng Standards

IHT Standard	Distance		Walk Time	
	Commuting and Walking to School	Other non-commuter journeys	Commuting and Walking to School	Other, non-commuter journeys
Desirable	500	400	6	5
Acceptable	1,000	800	12	10
Preferred Maximum	2,000	1,200	24	14

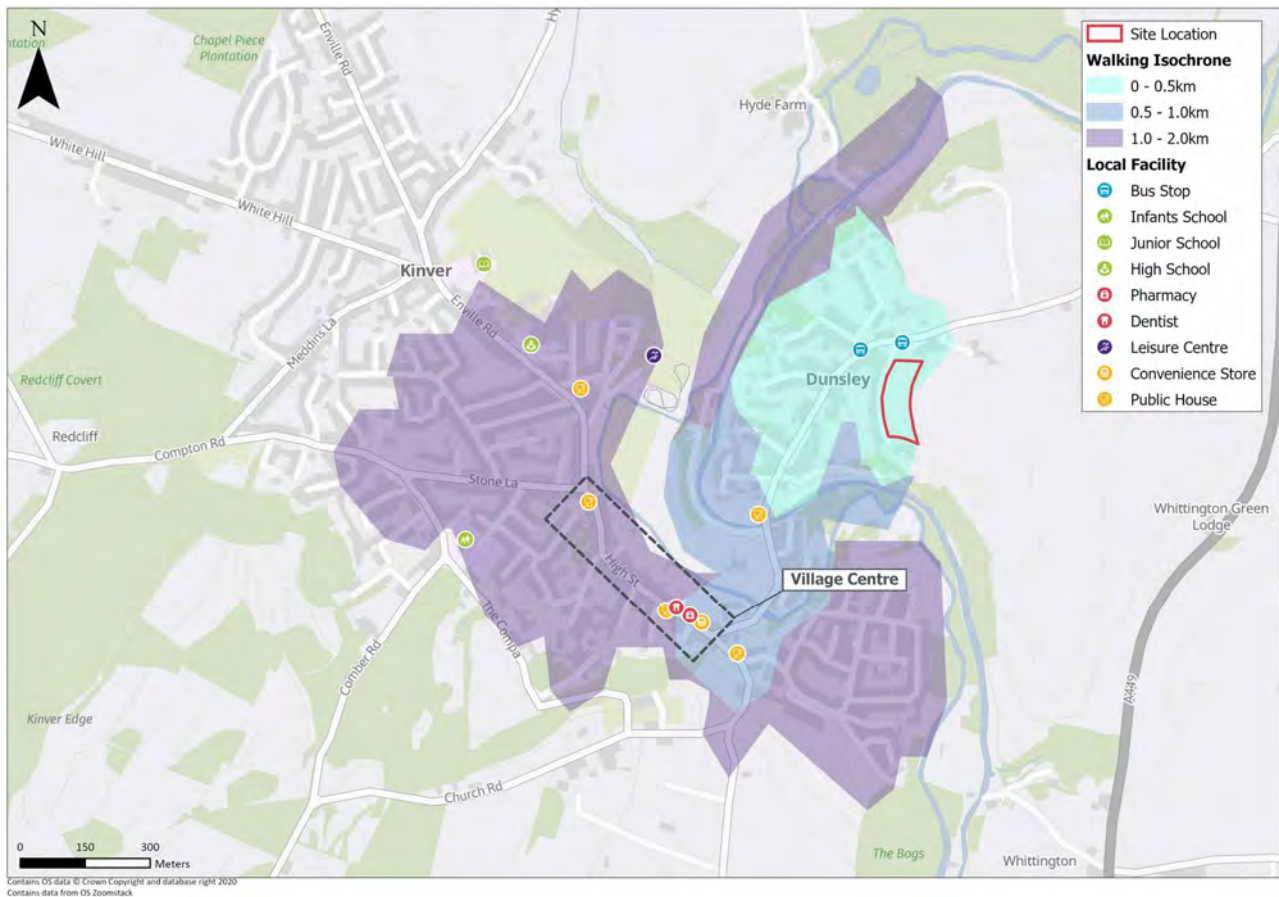
2.5.4 Local amenities within walking distance of the site are presented in Table 3. Distances are measured from the western boundary of the site, from which an access could be provided.

Table 3: Local Amenity Accessibility

Local Facility	Location	Distance from Site Access (m)	Walking Time (Minutes)	Within IHT Standard
The Vine Inn (Public House)	Dunsley Road	600	6	Acceptable
The Cross Inn (Public House)	Church Hill	1100m	12	Preferred Maximum
Kinver High Street	High Street	1200m	13	Preferred Maximum
Co-op Food (Convenience Store)	High Street	1200m	13	Preferred Maximum
Kinver Post Office	High Street	1200m	13	Preferred Maximum
Bills Pharmacy	High Street	1200m	14	Preferred Maximum
White Harte (Public House)	High Street	1200m	14	Preferred Maximum
Kinver Village Dental Practice	High Street	1200m	14	Preferred Maximum
Foley Infant Academy	Fairfield Drive	1800m	21	Preferred Maximum
Kinver High School	Enville Road	1800m	22	Preferred Maximum
Kinver Dental Surgery	Enville Road	1800m	22	Preferred Maximum
Kinver Sports and Community Association	Sterrymere Gardens	1800m	22	-
Brindley Heath Junior School	Enville Road	2000m	25	Preferred Maximum

2.5.5 Figure 3 shows the location of each amenity in relation to the site.

Figure 3: Local Amenities



2.5.6 Figure 3 demonstrates that there are several amenities accessible within walking distance of the site. This includes Kinver village centre, which provides numerous shops, eateries and medical facilities.

2.6 Highway Safety

2.6.1 In order to establish whether there are any safety concerns on the local highway network that might be exacerbated by the development of the site, publicly available collision records have been obtained from the crashmap.co.uk website for the most recent five-year period (01/01/2016 - 31/12/2020). Consideration has been given to junctions with Dunsley Road, between the A449 and High Street.

2.6.2 The recorded collisions are presented in Figure 4.

Figure 4: Collision Data



- 2.6.3 A total of five collisions have occurred within the most recent five-year period, all of which were slight in severity. As demonstrated by Figure 4, these collisions were spread across the study area, with no more than one collision recorded at any one location.
- 2.6.4 At the junction between Dunsley Road and Dunsley Drive there has been just one collision, which involved one vehicle. Within the study area as a whole, there have been no collisions involving pedestrians or cyclists.
- 2.6.5 Therefore, based on the information provided above, it is concluded that there are no existing highway safety issues which would be exacerbated by the residential development of the site.

3 Access Strategy

3.1 Overview

3.1.1 Access to the site can be provided via Dunsley Drive. The junction would be positioned approximately 60m south of the junction with Dunsley Road.

3.1.2 A 3D access design has been prepared for two access options, which are included in **Appendix A and B** respectively. Both options have been designed in accordance with the Staffordshire Residential Design Guide (2000).

Option 1

3.1.3 Option 1 comprises a 5.0m wide priority junction from Dunsley Drive with 10m kerb radii. At the junction, a footway is provided on the northern side of the carriageway, measuring 1.8m width. Along the main spine road within the site, footways measuring 1.8m in width are provided on both sides of the carriageway. At the mouth of the access junction, a dropped kerb crossing with tactile paving is provided to accommodate north to south pedestrian movements.

3.1.4 Within the site, a second priority junction from the main spine road will be provided to provide access to the plots in the northern section of the site. This would also measure 5.0m in width, with 6m kerb radii. Footways measuring 1.8m in width are provided on either side of the carriageway.

3.1.5 A drawing is provided in **Appendix A**.

Option 2

3.1.6 In Option 2, the priority at the site access junction has been reversed to give priority to vehicles accessing the site. As per Option 1, a 5.0m access road is provided with a 1.8m footway on the northern side of the carriageway. Within the site, 1.8m footways are provided on both sides of the carriageway.

3.1.7 As per Option 1 a secondary priority junction is provided from the spine road within the site, measuring 5.0m in width with 6m kerb radii. Again, footways of 1.8m are provided on either side of the carriageway.

3.1.8 A drawing is provided in **Appendix B**.

Swept Path Analysis

3.1.9 Swept Path Analysis drawings have been prepared for both access options, showing the movements of a 10.2m refuse vehicle, 5.08m large car and 7.2m van. These are included in the drawings in **Appendix A** and **Appendix B**. The swept path analysis demonstrates that each vehicle can manoeuvre into and out of the site.

3.2 Pedestrian Infrastructure

3.2.1 An uncontrolled pedestrian crossing with dropped kerbs and tactile paving would be provided just north of the proposed site access, to connect the footway on the northern side of the carriageway to the existing provision on the western side of Dunsley Drive.

3.2.2 As previously described, the existing footway on Dunsley Drive does not extend further than the junction with Dunsley Road. Therefore, a new 2m wide footway connection will be provided from Dunsley Drive, extending west. Opposite the junction with Hampton Grove, an uncontrolled pedestrian crossing with dropped kerbs and tactile paving would be provided to connect the proposed footway with the bus stop and existing footway provision on the northern side of Dunsley Road. To accommodate this, the bank on the southern side of Dunsley Road would need to be re-graded.

4 Travel Demand

4.1 Introduction

4.1.1 This section provides a summary of the travel demand calculations that have been used to determine the impact of the development proposals.

4.2 Trip Generation

4.2.1 The vehicular trip generation for the proposed residential site has been derived from the TRICS database. The following criteria has been used:

- Land Use 03/A – Houses privately owned;
- Great Britain (excluding sites within Greater London and Irish planning regions);
- Sites within an 'Edge of Town' location and
- Sites comprising 10 – 50 dwellings
- Removing sites surveyed during Covid-19 restrictions and any sites including flats.

- 4.2.2 As previously noted, it is estimated that approximately 35 dwellings could be accommodated on the site.
- 4.2.3 The resultant trip generation for 35 dwellings is presented in Table 4. Full TRICS output reports are provided within **Appendix C**.

Table 4: Trip Generation

	AM Peak (08:00 – 09:00)			PM Peak (15:00 – 16:00)		
	Arrive	Depart	Two-Way	Arrive	Depart	Two-Way
Trip Rate (per dwelling)	0.157	0.349	0.506	0.331	0.172	0.503
Trip Generation (35 dwellings)	5	12	18	12	6	18

- 4.2.4 Table 4 demonstrates that the proposed development would generate a total of 18 two-way trips during the AM and PM peaks. This is equivalent to fewer than one trip every three minutes.

4.3 Trip Distribution

- 4.3.1 Census 2011 Journey to Work data for the South Staffordshire 014 MSOA has been used to estimate vehicular trip distribution. ArcGIS has been used as a tool to assign trips to the local highway network. This shows that 92% leaving the site via Dunsley Drive turn right and travel east on Dunsley Road and 8% of trips turn left and travel west on Dunsley Road.

4.4 Highway Impact

- 4.4.1 Based on the above, there will be an impact of no more than 17 two-way trips at any junction beyond the Dunsley Drive / Dunsley Road junction. This equates to an increase of just one trip every 3-4 minutes, which would be imperceptible from day-to-day fluctuations in traffic levels.
- 4.4.2 The residential development of the site would therefore not have a severe impact on the highway network, and no junction capacity assessments would be required as part of any planning application.

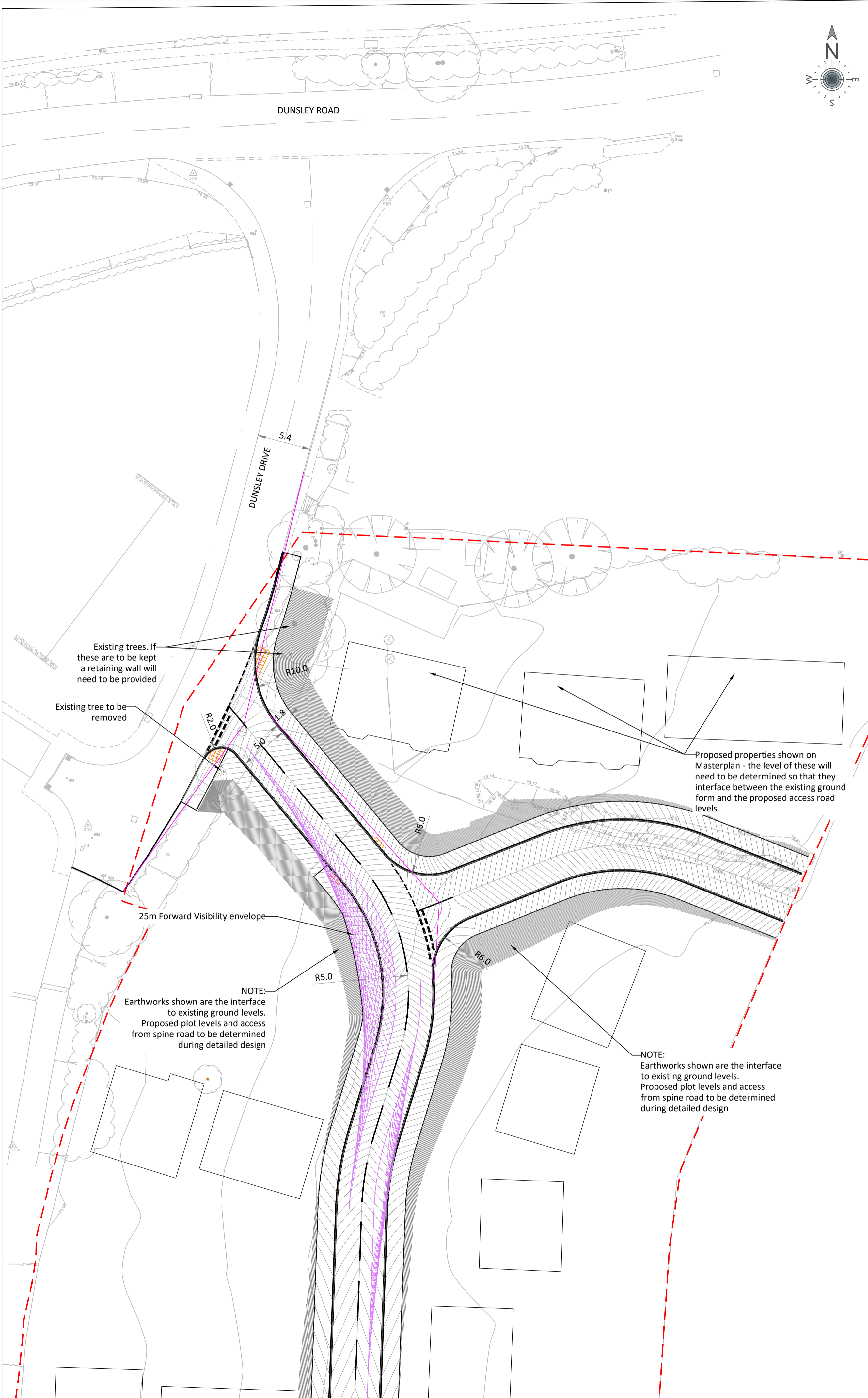
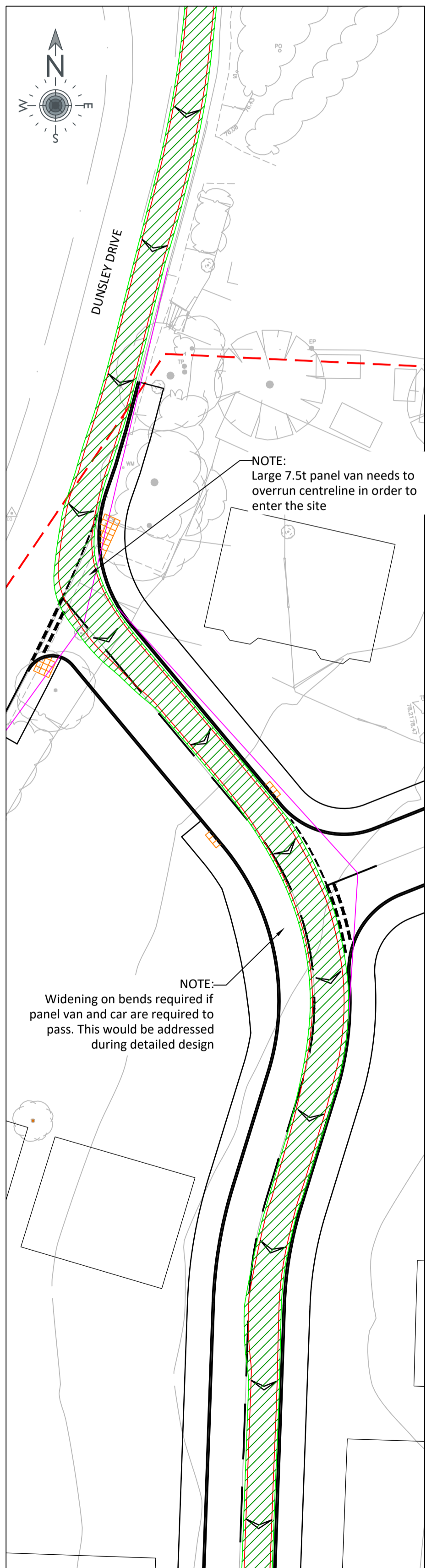
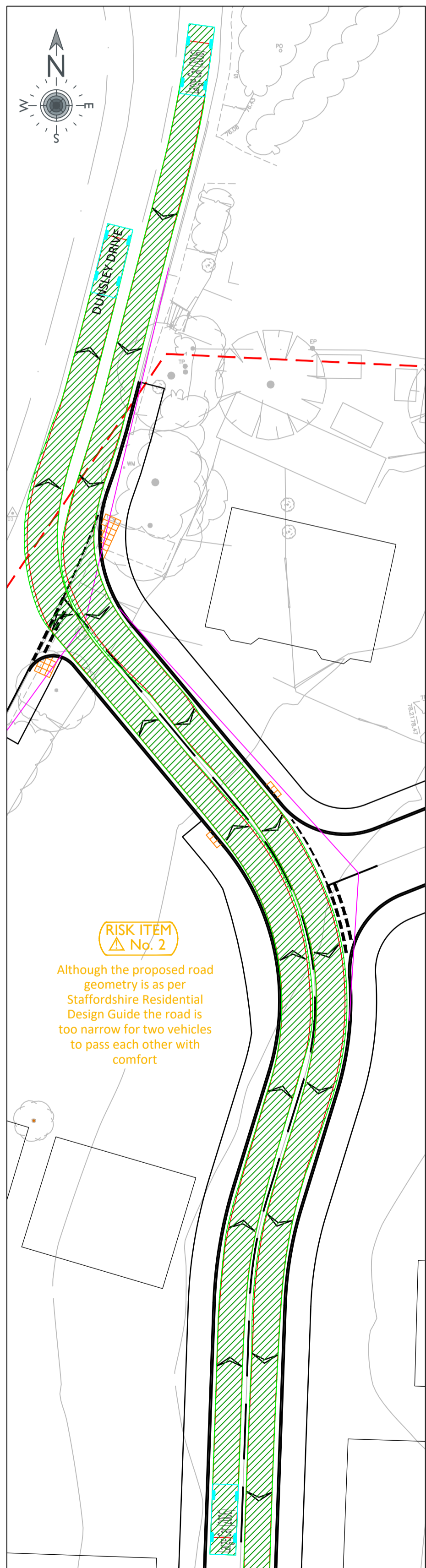
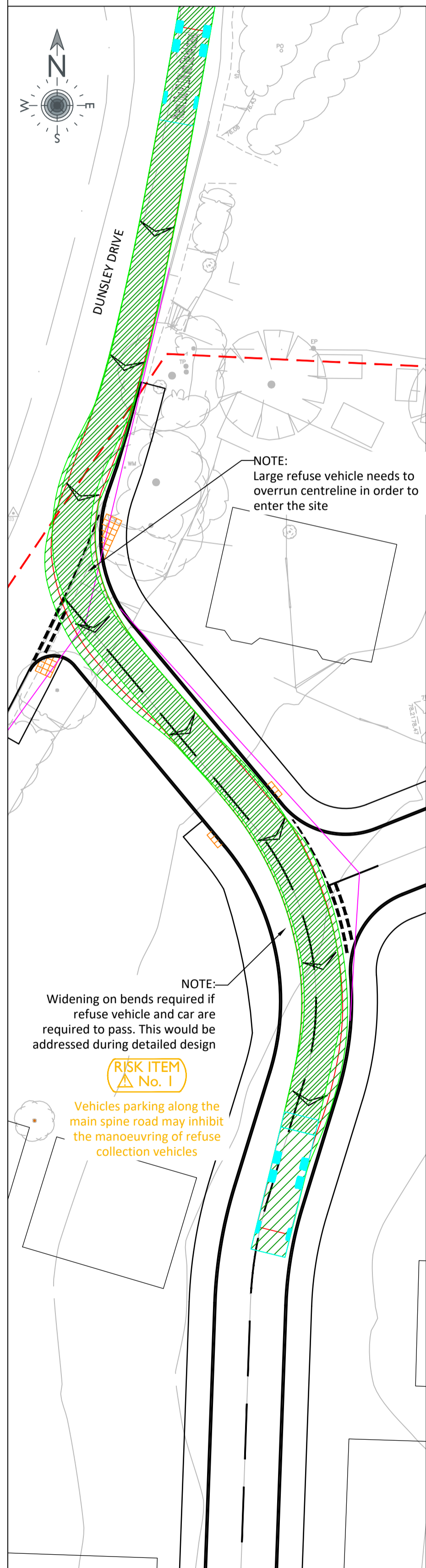
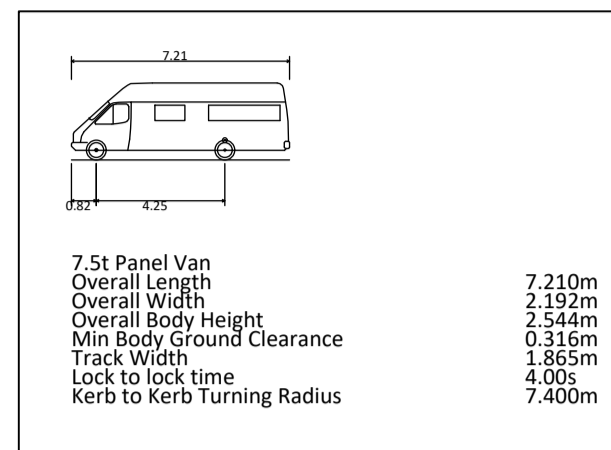
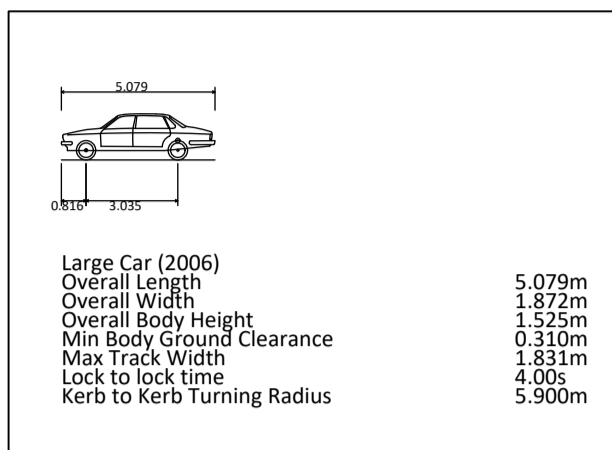
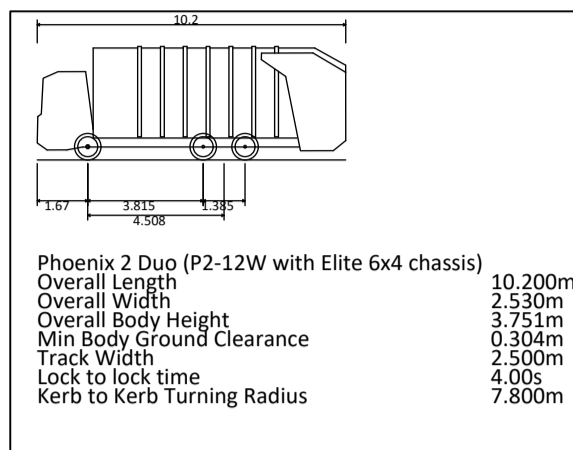
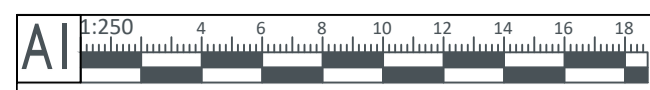
5 Summary

- 5.1.1 This technical note sets out the transport considerations and suitability of access for a potential residential development on land off Dunsley Drive, Kinver and demonstrates the following:
 - The site is accessible via sustainable modes of transport and there are a variety of amenities within IHT guidelines for walking distances;
 - A safe and suitable means of access can be achieved via Dunsley Drive;

- A footway will be provided on the northern side of the access road, with a new pedestrian crossing on Dunsley Drive to connect into the existing provision. A new footway can also be provided along Dunsley Road, connecting the site to the existing provision on Dunsley Road;
- The trip generation has been estimated based on 35 dwellings being developed on the site. It is forecast that the site would generate a total of 18 two-way trips during the AM and PM peaks, equating to approximately one trip every 3-4 minutes; and
- The traffic generated by the development would result in an imperceptible increase in vehicular trips and would therefore not constitute a severe impact on the local highway network.



Appendix A Site Access Drawing – Option I



NOTES

These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

- KEY**
- Proposed Contour 50mm Interval
 - Junction Visibility Splay (2.4m x 25m)
 - Forward Visibility Splay (25m)
 - Approximate Site Boundary

- This drawing is to be read in conjunction with all other relevant Engineering and Architect's details.
- The purpose of this drawing is to display the various design vehicle swept paths manoeuvring through the proposed junction. The drawing is for discussion purposes only, with the design subject to further design development, modelling assessment, data collection and consideration of constraints.
- The concept design is based on topographical survey data and design information for surrounding roads:
 - Topographical Survey (filename: 38125NG15-01-02.dwg)
 - Internal development layout (filename: BEL13007 Feasibility Layout KW 240119.pdf)
- The highway boundary extents will need to be confirmed. All works are proposed to be within the highway boundary or Developer owned land, it is assumed that the highway and site boundary abut each other.
- The concept alignment and junction has been based on DMRB CD100, CD123, M5 and local authority design standards, existing road conditions and the vehicle swept paths presented have informed/validated the proposed geometry of the layout.
- The design vehicles that have been considered in the swept path analysis have been listed below and the relevant vehicle profiles are included to highlight the vehicle dimensions. The vehicle profiles selected below are the most frequent vehicles expected to access the site.
 - Small Sized Vehicles
 - Large Car (2006)
 - Medium Sized Vehicles
 - 7.5t Panel Van
 - Large Sized Vehicles
 - Refuse vehicle - Phoenix 2 Duo 2 Recycler (P2-15W with Elite 6x4 chassis)*

*design vehicles to be confirmed with the client and local authority and alternative vehicles may need to be used.
- The speeds at which vehicle swept paths have been tracked have been summarised below, subject to approving authority agreement:
 - Large Car 20mph (dropping to 10mph at site access)
 - Panel Van 10mph
 - Refuse Vehicle 10mph
- Offsets to the channel and centre line of the proposed road alignments have been maintained where possible for all vehicle manoeuvres and these are listed as follows, subject to approving authority agreement:
 - Small and medium sized vehicles
 - Channel line clearance 0.25m
 - Centre line clearance 0.25m
 - Large vehicles
 - Channel line clearance 0.50m

PO	07/01/2022	Initial Issue	RAH
REV	DATE	REVISION NOTE	BY

PJA Seven House - High Street
Longbridge - Birmingham
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Birmingham - Bristol
Exeter - London - Reading
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CLIENT
Bellway Homes Limited

PROJECT
**Land at Dunsley Drive
Dunsley
Kinver**

DRAWING TITLE
**Site Access
Priority Junction**

DRAWING ISSUE STATUS
INFORMATION

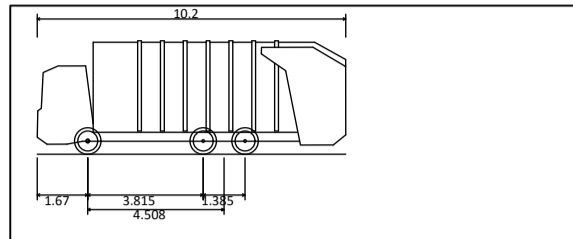
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06024	- A -	100	- P0

Revision Letter : P - Prelim / A - Approval / T - Tender / C - Construction
BIM DRAWING REFERENCE

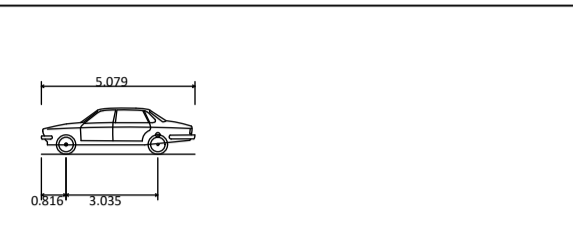
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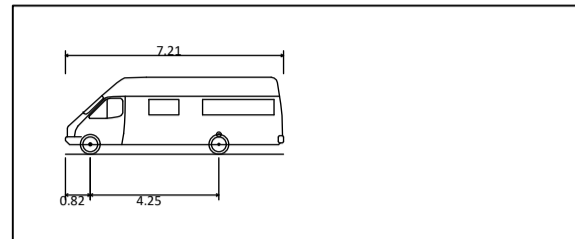
Appendix B Site Access Drawing – Option 2



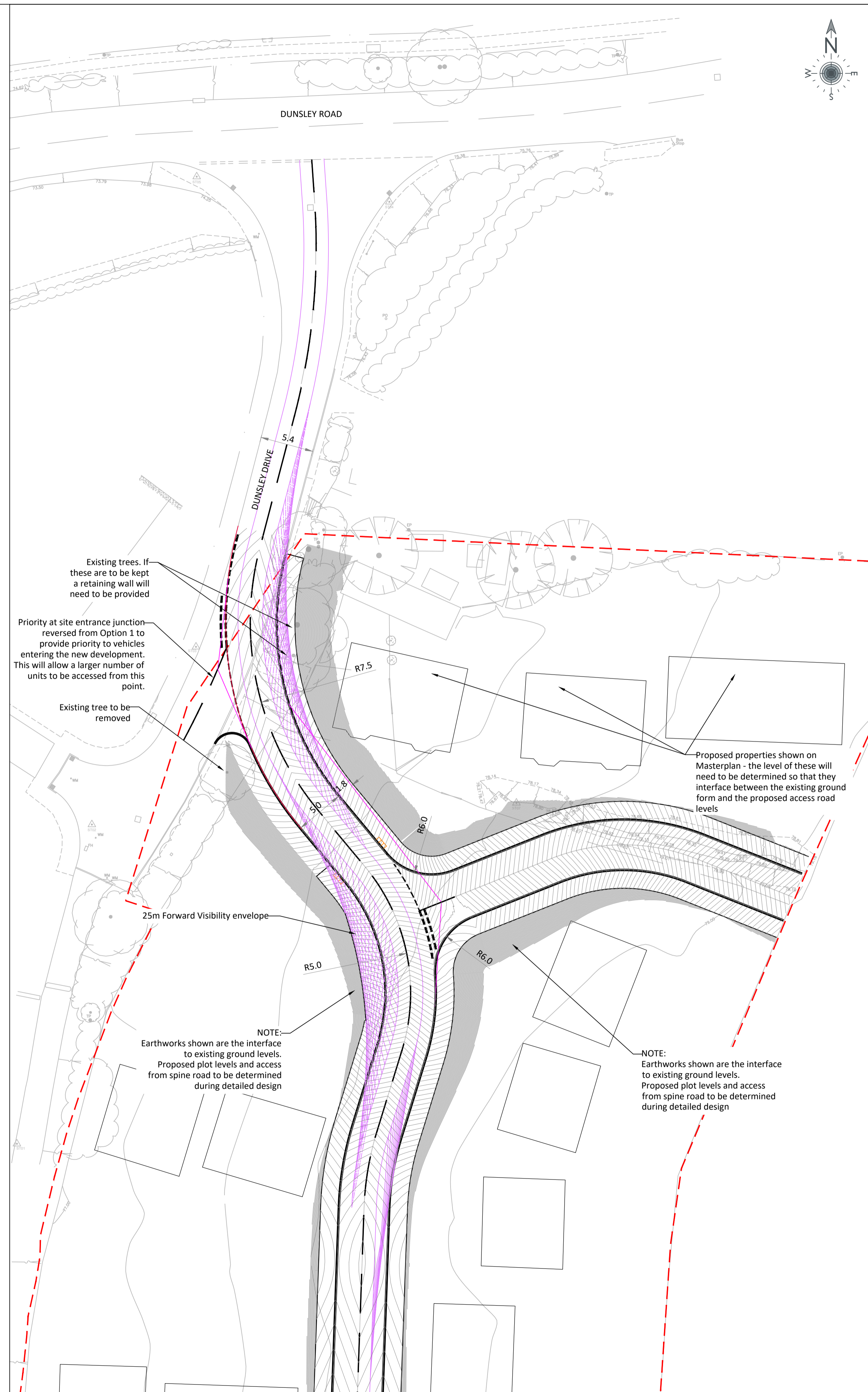
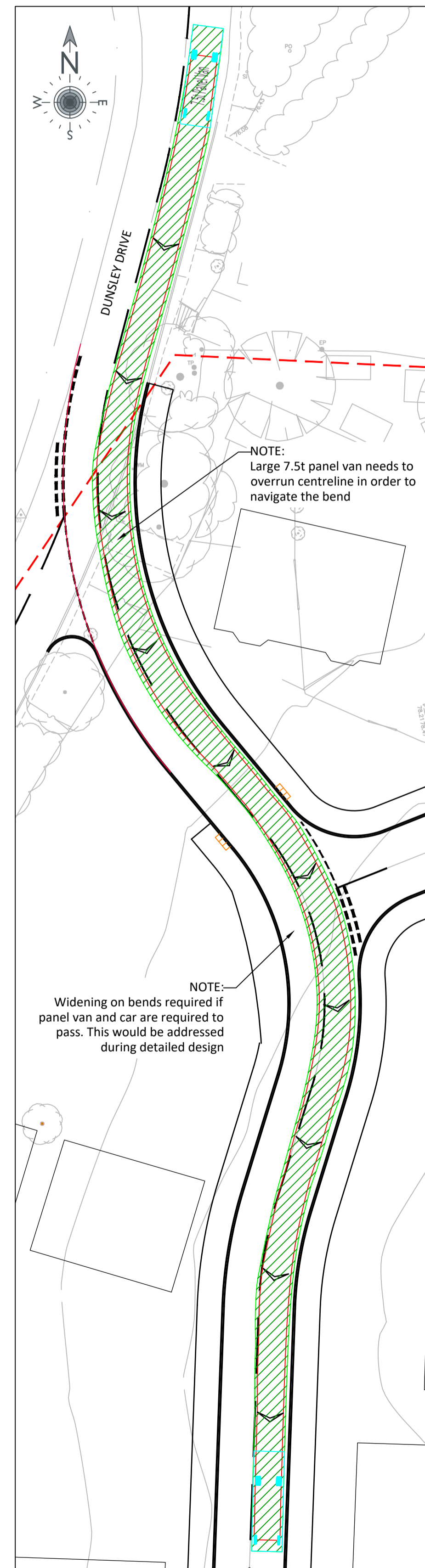
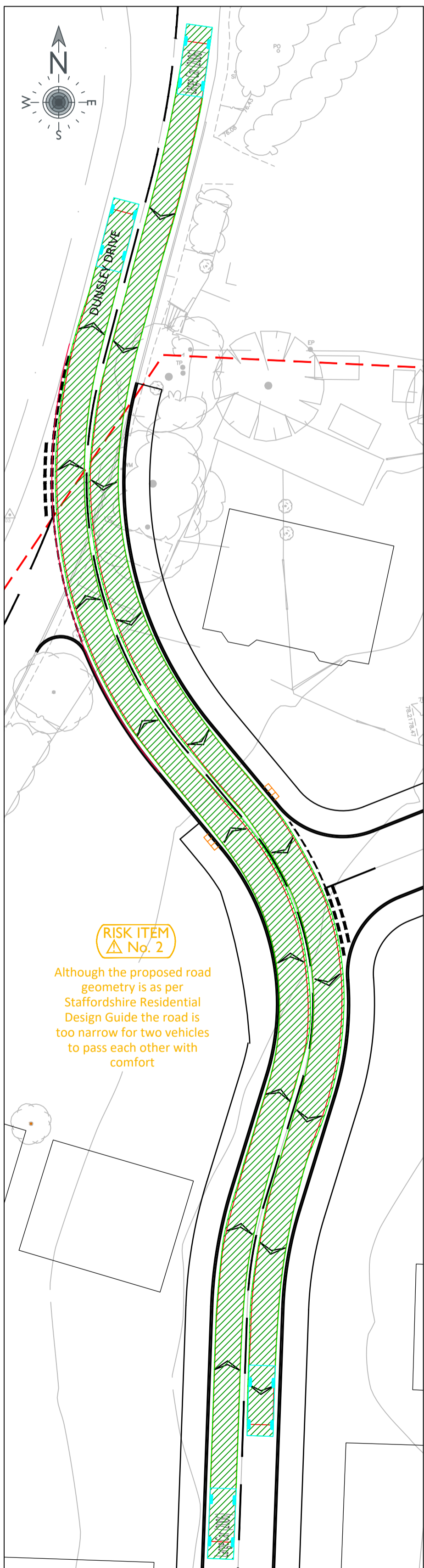
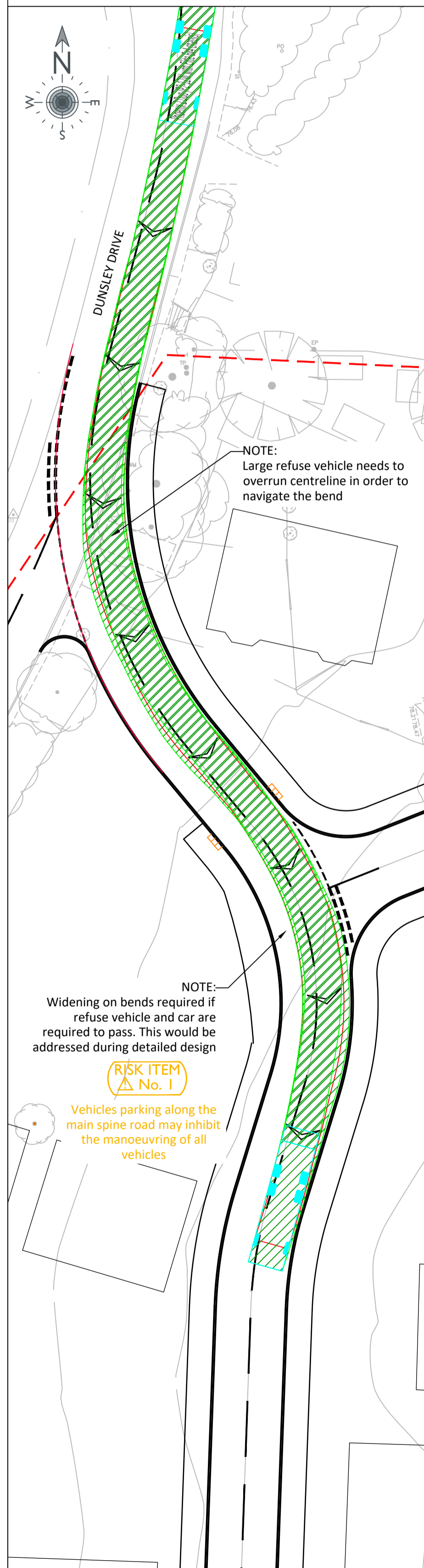
Phoenix 2 Duo (P2-12W with Elite 6x4 chassis)
 Overall Length 10.200m
 Overall Width 2.530m
 Overall Body Height 3.751m
 Min Body Ground Clearance 0.304m
 Track Width 2.500m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 7.800m



Large Car (2006)
 Overall Length 5.079m
 Overall Width 1.872m
 Overall Body Height 1.525m
 Min Body Ground Clearance 0.310m
 Max Track Width 1.831m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 5.900m



7.5t Panel Van
 Overall Length 7.210m
 Overall Width 2.192m
 Overall Body Height 2.544m
 Min Body Ground Clearance 0.316m
 Track Width 1.865m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 7.400m



NOTES
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KEY

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 - Large Sized Vehicles
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*design vehicles to be confirmed with the client and local authority and alternative vehicles may need to be used.

- The speeds at which vehicle swept paths have been tracked have been summarised below, subject to approving authority agreement:
 - Large Car 20mph (dropping to 10mph at site access)
 - Panel Van 10mph
 - Refuse Vehicle 10mph
- Offsets to the channel and centre line of the proposed road alignments have been maintained where possible for all vehicle manoeuvres and these are listed as follows, subject to approving authority agreement:
 - Small and medium sized vehicles Channel line clearance 0.25m Centre line clearance 0.25m
 - Large vehicles Channel line clearance 0.50m

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Bellway Homes Limited

PROJECT
 Land at Dunsley Drive
 Dunsley
 Kinver

DRAWING TITLE
 Site Access
 Option 2
 Through Junction

DRAWING ISSUE STATUS
INFORMATION

PJA JOB No. SUB-CODE DRAWING NO. REVISION
 06024 - A - 200 - PO

Revision Letter: P - Prelim / A - Approval / T - Tender / C - Construction
 BIM DRAWING REFERENCE

SCALE	DRAWN	REVIEWED	DATE
AI@1:500	RAH	AN	Jan-22

Appendix C TRICS Outputs

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

TOTAL VEHICLESSelected regions and areas:

02	SOUTH EAST	
	HC HAMPSHIRE	2 days
03	SOUTH WEST	
	DC DORSET	1 days
	SM SOMERSET	1 days
04	EAST ANGLIA	
	NF NORFOLK	2 days
	SF SUFFOLK	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
	ST STAFFORDSHIRE	1 days
	WK WARWICKSHIRE	2 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days
08	NORTH WEST	
	CH CHESHIRE	2 days
	LC LANCASHIRE	1 days
10	WALES	
	VG VALE OF GLAMORGAN	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 10 to 49 (units:)
 Range Selected by User: 10 to 50 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/13 to 27/05/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	2 days
Wednesday	5 days
Thursday	4 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	16 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone 16

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 16 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,001 to 5,000	2 days
5,001 to 10,000	3 days
10,001 to 15,000	5 days
15,001 to 20,000	3 days
20,001 to 25,000	2 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	1 days
50,001 to 75,000	3 days
75,001 to 100,000	3 days
125,001 to 250,000	4 days
250,001 to 500,000	3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	12 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	4 days
No	12 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 16 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CH-03-A-09	TERRACED HOUSES	CHESHIRE
	GREYSTOKE ROAD		
	MACCLESFIELD		
	HURDSFIELD		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	24	
	Survey date: MONDAY	24/11/14	Survey Type: MANUAL
2	CH-03-A-10	SEMI-DETACHED & TERRACED	CHESHIRE
	MEADOW DRIVE		
	NORTHWICH		
	BARNTON		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40	
	Survey date: TUESDAY	04/06/19	Survey Type: MANUAL
3	DC-03-A-08	BUNGALOWS	DORSET
	HURSTDENE ROAD		
	BOURNEMOUTH		
	CASTLE LANE WEST		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	28	
	Survey date: MONDAY	24/03/14	Survey Type: MANUAL
4	HC-03-A-21	TERRACED & SEMI-DETACHED	HAMPSHIRE
	PRIESTLEY ROAD		
	BASINGSTOKE		
	HOUNDMILLS		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	39	
	Survey date: TUESDAY	13/11/18	Survey Type: MANUAL
5	HC-03-A-22	MIXED HOUSES	HAMPSHIRE
	BOW LAKE GARDENS		
	NEAR EASTLEIGH		
	BISHOPSTOKE		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40	
	Survey date: WEDNESDAY	31/10/18	Survey Type: MANUAL
6	LC-03-A-31	DETACHED HOUSES	LANCASHIRE
	GREENSIDE		
	PRESTON		
	COTTAM		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	32	
	Survey date: FRIDAY	17/11/17	Survey Type: MANUAL
7	NF-03-A-03	DETACHED HOUSES	NORFOLK
	HALING WAY		
	THETFORD		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	10	
	Survey date: WEDNESDAY	16/09/15	Survey Type: MANUAL
8	NF-03-A-05	MIXED HOUSES	NORFOLK
	HEATH DRIVE		
	HOLT		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40	
	Survey date: THURSDAY	19/09/19	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

9	NY-03-A-11 HORSEFAIR BOROUGHBRIDGE	PRIVATE HOUSING		NORTH YORKSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		23	
	Survey date: WEDNESDAY		18/09/13	Survey Type: MANUAL
10	SF-03-A-05 VALE LANE BURY ST EDMUNDS	DETACHED HOUSES		SUFFOLK
	Edge of Town Residential Zone Total No of Dwellings:		18	
	Survey date: WEDNESDAY		09/09/15	Survey Type: MANUAL
11	SH-03-A-06 ELLESMERE ROAD SHREWSBURY	BUNGALOWS		SHROPSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		16	
	Survey date: THURSDAY		22/05/14	Survey Type: MANUAL
12	SM-03-A-01 WEMBDON ROAD BRIDGWATER NORTHFIELD	DETACHED & SEMI		SOMERSET
	Edge of Town Residential Zone Total No of Dwellings:		33	
	Survey date: THURSDAY		24/09/15	Survey Type: MANUAL
13	ST-03-A-08 SILKMORE CRESCENT STAFFORD MEADOWCROFT PARK	DETACHED HOUSES		STAFFORDSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		26	
	Survey date: WEDNESDAY		22/11/17	Survey Type: MANUAL
14	VG-03-A-01 ARTHUR STREET BARRY	SEMI-DETACHED & TERRACED		VALE OF GLAMORGAN
	Edge of Town Residential Zone Total No of Dwellings:		12	
	Survey date: MONDAY		08/05/17	Survey Type: MANUAL
15	WK-03-A-02 NARBERTH WAY COVENTRY POTTERS GREEN	BUNGALOWS		WARWICKSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		17	
	Survey date: THURSDAY		17/10/13	Survey Type: MANUAL
16	WK-03-A-04 DALEHOUSE LANE KENILWORTH	DETACHED HOUSES		WARWICKSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		49	
	Survey date: FRIDAY		27/09/19	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
BD-03-A-03	Covid
WO-03-A-07	Covid

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

TOTAL VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	28	0.083	16	28	0.302	16	28	0.385
08:00 - 09:00	16	28	0.157	16	28	0.349	16	28	0.506
09:00 - 10:00	16	28	0.150	16	28	0.230	16	28	0.380
10:00 - 11:00	16	28	0.166	16	28	0.174	16	28	0.340
11:00 - 12:00	16	28	0.170	16	28	0.201	16	28	0.371
12:00 - 13:00	16	28	0.166	16	28	0.199	16	28	0.365
13:00 - 14:00	16	28	0.190	16	28	0.161	16	28	0.351
14:00 - 15:00	16	28	0.174	16	28	0.199	16	28	0.373
15:00 - 16:00	16	28	0.302	16	28	0.237	16	28	0.539
16:00 - 17:00	16	28	0.291	16	28	0.154	16	28	0.445
17:00 - 18:00	16	28	0.331	16	28	0.172	16	28	0.503
18:00 - 19:00	16	28	0.246	16	28	0.136	16	28	0.382
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.426			2.514			4.940

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	10 - 49 (units:)
Survey date range:	01/01/13 - 27/05/21
Number of weekdays (Monday-Friday):	16
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	1
Surveys manually removed from selection:	2

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix 7: Link Flood Risk Appraisal



Bellway Homes Limited

Dunsley Drive, Kinver

Flood Risk Appraisal

LE20150- DD-LE-GEN-XX-RP-CE-FRA01-P1-Flood Risk Appraisal

April 2022





Bellway Homes Limited

Dunsley Drive, Kinver

Flood Risk Appraisal

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-P1-Flood Risk Appraisal

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LE21550

DATE:

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1

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KL

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NHM

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KL

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3

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KL

Updated to reflect client comments

Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

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CONTENTS

1	INTRODUCTION	1
1.1	Background	1
1.2	Site Location	1
1.3	Topography	1
1.4	Ground conditions	1
1.5	Watercourses	2
1.6	Drainage	2
1.7	Flood Zones and Vulnerability Classification	2
1.8	National Planning Flood Risk Policies Relevant to this Development	3
1.9	Local Policy Guidance	5
2	FLOOD RISK	8
2.1	Flood Risk from Rivers and Watercourses	8
2.2	Flooding from the Sea	8
2.3	Flooding from Land	8
2.4	Flooding from Groundwater	9
2.5	Flooding from Sewers	9
2.6	Flooding from Reservoirs, Canals and Other Artificial Sources	10
3	MITIGATION	11
3.1	Flood Risk Management	11
3.2	Residual Risks	11
4	PROPOSED DRAINAGE STRATEGY	12
4.1	Outfall Assessment	12
4.2	SuDS Assessment	12
4.3	Proposed Surface Water Drainage Strategy	13
4.4	Foul Water Drainage Strategy	14
5	DRAINAGE MANAGEMENT PLAN	15
5.1	Responsibility	15
5.2	Maintenance of Pipe Networks	15
5.3	Maintenance of SuDS Features	15
6	CONCLUSION	17
APPENDICES		
APPENDIX A – SITE LOCATION PLAN		

Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDIX B – SEVERN TRENT WATER CORRESPONDENCE AND SEWER RECORDS

APPENDIX C – HYDRAULIC CALCULATIONS

1 INTRODUCTION

1.1 Background

- 1.1.1 Link was commissioned by Bellway Homes Limited to prepare a Flood Risk Appraisal (FRA) and associated Drainage Strategy in respect to a proposed development at Dunsley Drive, Kinver. This report has been prepared to support the promotion of the site for approximately 35 new homes through the emerging South Staffordshire Local Plan Review.
- 1.1.2 The exact number of dwellings that can be constructed depends on the extent of developable land on the site, which will be influenced by the flood risk posed to the site. A particular aim of this FRA is to inform this extent of developable land. The overall extent of the site is included in a site location plan provide in **Appendix A**.

1.2 Site Location

- 1.2.1 The site is located along the eastern edge of Dunsley Drive in Kinver, Staffordshire. The site is enclosed by Dunsley Drive to the west and Dunsley Road to the north.

1.3 Topography

- 1.3.1 The existing site level range has been found to range from approximately 77.3mAOD on its western edge to 79.9mAOD on its southern extent and generally falls in a north-westerly direction. The site consists primarily of empty field land with no distinguishing features or structures.

1.4 Ground conditions

- 1.4.1 A review of the British Geological Survey's geological mapping has been undertaken to determine the likely ground conditions on the site. Geological maps on the British Geological Survey online tools identify the Chester Formation as the bedrock geology, which consists of sandstone and conglomerate. No superficial deposits were recorded for this location.
- 1.4.2 Furthermore, publicly available boreholes in the proximity of the site have been reviewed. It should be noted that whilst there are records of borehole scans within a few hundred metres of the site, these lie on a different formation and thus are not representative of the ground conditions on site. A borehole scan taken on the same formation approximately 2km to the north of Dunsley Drive indicates a strata composition of red clays and cobbles to a depth of 1.5m, then a large stratum of soft red sandstone to a great depth (85m+).
- 1.4.3 Given the location of this borehole scan in relation to the site, it is recommended that a site investigation be carried out to determine the true ground conditions on site. As suggested by the Geological Survey and the borehole scan, the soil strata are likely to be granular in nature which could facilitate infiltration drainage for surface water. A site investigation and subsequent infiltration testing would need to be conducted in order to confirm this (see Section 4.1 for further details).

1.5 Watercourses

1.5.1 As part of this report, a review of the existing watercourses in close proximity to the site has been completed. The nearest watercourse is the River Stour, which encircles the site on its northern, western and southern edges. The river is located at 120m to the south of the site, approximately 380m to the west and north-west, and 440m to the north. Given the proximity of the River Stour to the proposed development, it is essential that the flood risk posed to the site by this body of water is assessed. This associated flood risk is discussed further in Section 1.7 and Section 2.1.

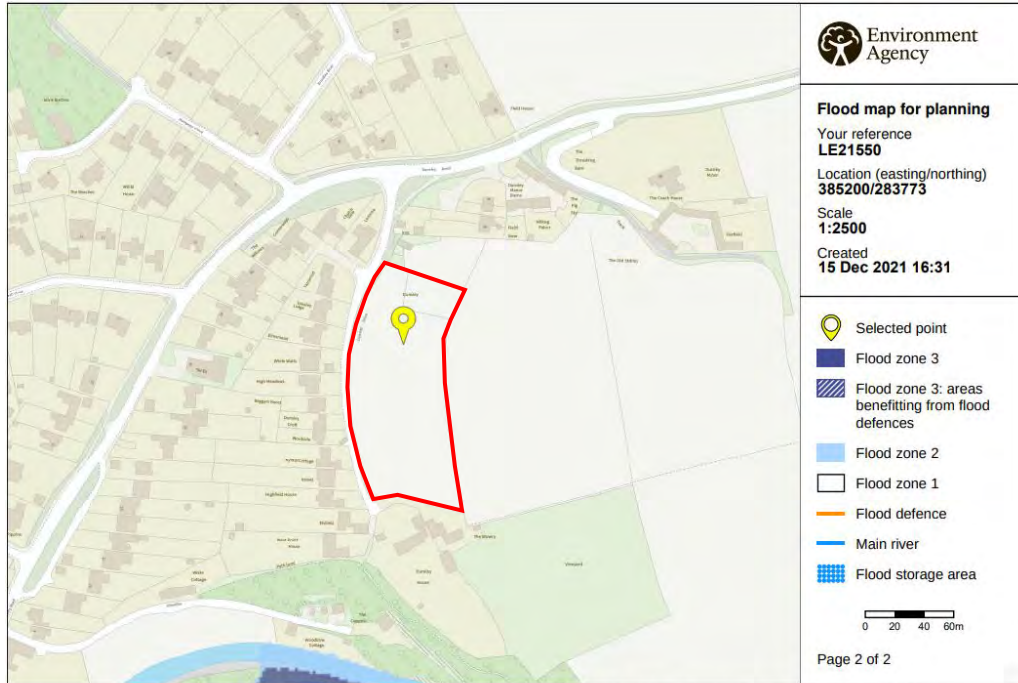
1.6 Drainage

1.6.1 A developer's enquiry was submitted to Severn Trent Water (STW), the local water authority, to determine whether there are any existing sewers within or in the vicinity of the site. The correspondence and accompanying sewer record provided by STW is included in **Appendix B**, which indicates the presence of a single foul sewer in Dunsley Road to the north of the site, which follows the profile of the road and falls in a south-westerly direction.

1.6.2 It is anticipated that the foul drainage for this proposed development shall outfall into this existing sewer, given its proximity to the site. Since no surface water sewers have been identified in the vicinity of the site and the River Stour is at a minimum distance of 120m from the site, it is anticipated that the surface water strategy for the site shall outfall via infiltration drainage, as suggested in Section 1.4.

1.7 Flood Zones and Vulnerability Classification

1.7.1 The formal flood zone mapping approved by the government and prepared for use in the planning process, identifies areas potentially at risk of flooding from fluvial or tidal sources without taking into account the presence of flood defences or structures such as culverts or minor watercourses. An extract from the mapping is included in Figure 1 below; the yellow marker denotes the site location.



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Figure 1: Flooding from Rivers and Watercourses

1.7.2 The formal flood zone mapping shows the site to be located entirely within Flood Zone 1, which implies an annual probability of flooding of less than 0.1% (corresponding to a 1 in 1000 year storm or less frequent), and therefore can be considered to be at a very low risk of flooding from nearby watercourses. Table 1 overleaf indicates what uses of land are appropriate for each flood zone, as set out within Table 3 – Flood risk vulnerability and flood zone ‘compatibility’ in the National Planning Policy Framework (NPPF). The proposed use would be defined as ‘More Vulnerable’, hence the proposed use is deemed acceptable.

	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test	✓	✓	✓
Zone 3a	Exception Test	✗	Exception Test	✓	✓
Zone 3b	Exception Test	✗	✗	✗	✓

Table 1 - Flood risk vulnerability and flood zone ‘compatibility’

1.8 National Planning Flood Risk Policies Relevant to this Development

1.8.1 The NPPF last revised by the Department for Levelling Up, Housing and Communities (DLUHC) on 20th July 2021, took immediate effect on that date. The document Technical Guidance on the National Policy Framework (TGNPPF) also published by the Department for Levelling Up, Housing and Communities,

has now been withdrawn and superseded by the Planning Practice Guidance (PPG), published on 6 March 2014.

1.8.2 The requirement for conducting a FRA as part of a planning application is set out in Footnote 55 on page 48 of the NPPF, which states:

“A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.”

1.8.3 Essential content of a site specific FRA is explained in the NPPG, paragraph 30 as follows:

“A site-specific flood risk assessment is carried out by (or on behalf of) a developer to assess the flood risk to and from a development site. Where necessary (see footnote 5 in the National Planning Policy Framework), the assessment should accompany a planning application submitted to the local planning authority. The assessment should demonstrate to the decision-maker how flood risk will be managed now and over the development’s lifetime, taking climate change into account, and with regard to the vulnerability of its users (see Table 2 – Flood Risk Vulnerability).

- The objectives of a site-specific flood risk assessment are to establish:
- whether a proposed development is likely to be affected by current or future flooding from any source;
- whether it will increase flood risk elsewhere;
- whether the measures proposed to deal with these effects and risks are appropriate;
- The evidence for the local planning authority to apply (if necessary) the Sequential Test, and;
- Whether the development will be safe and pass the Exception Test, if applicable.”

1.8.4 For certain types of flood sensitive development, NPPF describes how the Local Planning Authority (LPA) should check that the site proposed has the lowest frequency of flooding of those available for the development. This check is called the “Sequential Test”. All development that is identified in the LPA’s Local Development Framework Development Plan (LDFDP) has been Sequentially Tested using the LPA’s Strategic Flood Risk Assessment (SFRA). When a test is required, and the development is not identified in the Development Plan, NPPF advises that the site-specific FRA includes the Test. NPPF also requires that the FRA includes an “Exception Test” for flood sensitive development proposed in areas with high frequency of flooding. The reason is to demonstrate that flood risk will be safely managed for the lifetime of the development.

1.8.5 According to the latest relevant Planning Practice Guidance, updated in February 2017, present day rainfall rates should be increased by 20% for design and by 40% to investigate the potential impact on flood risk of the current central expectation of climate change occurring in the anticipated 50 year lifetime of the development.

- 1.8.6 "Non-Statutory Technical Standards for Sustainable Drainage Systems" published by Department for Environment, Food and Rural Affairs in March 2015 sets out Government expectations for surface water drainage systems serving major developments to restrict discharges to green field rates. The standards do not address the quality of surface water discharges and state circumstances when the discharge rate can be higher than green field, up to the existing flow in the case of redevelopment of brown field sites.

1.9 Local Policy Guidance

- 1.9.1 The South Staffordshire core strategy, adopted in December 2012, outlines the requirements and considerations developers should follow as part of their proposals. As part of this report, the adopted policies have been reviewed, and the proposal has been developed to comply with their requirements. The relevant planning policies within the district plan, Core Policy 3: Sustainable Development and Climate Change, and Policy EQ7: Water Quality, are outlined below.

- 1.9.2 Core Policy 3: Sustainable Development and Climate Change

"The Council will require development to be designed to cater for the effects of climate change, making prudent use of natural resources, enabling opportunities for renewable energy and energy efficiency and helping to minimise any environmental impacts. This will be achieved by:

a) giving preference to development on previously developed land (brownfield land) in sustainable locations, provided it is not of high environmental value; and supporting and encouraging the reuse of buildings as a sustainable option;

b) supporting and encouraging development which facilitates sustainable modes of transport, including the transport of materials and recycling products, by requiring travel plans for developments which would have significant transport implications;

c) ensuring that development on brownfield land affected by contamination or land instability is remediated in accordance with the NPPF;

d) ensuring that all new development and conversion schemes, are located and designed to maximise energy efficiency, and incorporate the best environmental practice and sustainable construction techniques appropriate to the size and type of development; and minimises the consumption and extraction of minerals by making the greatest possible reuse and recycling of materials in new construction;

e) ensuring that building design is flexible to future needs and users, and reduces energy consumption by appropriate methods, such as high standards of insulation, layout, orientation, using natural lighting and ventilation, and capturing the sun's heat where appropriate;

f) minimising and managing waste in a sustainable way, particularly through re-use and recycling;

- g) protecting and enhancing South Staffordshire's natural and historic assets including natural habitats, the character and quality of the landscape and valued historic landscapes and the wider countryside, mitigation against the worst effects of climate change and pursuing biodiversity enhancement schemes and historic environment management proposals;*
- h) protecting and enhancing the character, local distinctiveness and setting of villages;*
- i) protecting and enhancing essential community facilities and services including sole facilities, buildings and open spaces, primary care and healthcare facilities;*
- j) guiding development away from known areas of flood risk as identified in the Strategic Flood Risk Assessment, Surface Water Management Plan and consistent with NPPF;*
- k) ensuring the use of sustainable drainage (Sustainable Drainage Systems) in all new development and promoting the retrofitting of SUDs where possible;*
- l) ensuring that all development includes pollution prevention measures where appropriate to prevent risk of pollution to controlled waters;*
- m) protecting the amenities of our residents and seeking to improve their overall quality of life through the provision of appropriate infrastructure, facilities and services.*
- n) consideration of the impact that development will have on the sterilisation of mineral resources and the potential for future extraction of these minerals*

Development proposals should be consistent with the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions), the Supplementary Planning Document on Sustainable Development and other local planning policies."

1.9.3 Policy EQ7: Water Quality

"Development will be permitted where proposals do not have a negative impact on water quality, either directly through pollution of surface or groundwater or indirectly through overloading of Wastewater Treatment Works. Consultation must be held with Severn Trent Water ahead of the progression of any potential development to ensure appropriate wastewater infrastructure is in place in sufficient time, particularly where potential development will depend on Codsall, Penkridge and Wombourne Wastewater Treatment Works where there is a known capacity restriction.

Further site specific analysis of any development proposals located in proximity or upstream of environmentally significant sites, including Sites of Special Scientific Interest (SSSIs), and European Sites including Motte Meadows Special Area of Conservation (SAC) will be required in order to validate any relevant planning application to demonstrate that the development will have no adverse effect on environmentally significant sites. Non mains drainage will not be permitted where it is likely to cause adverse effects at sensitive ecological sites. In line with objectives of the Water Framework Directive (WFD), development proposals must not adversely affect the water quality of waterbodies in the District and wherever possible take measures to improve it.

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

All planning applications must include a suitable Sustainable Drainage (SUDs) scheme, and greater detail will be considered in a Sustainable Development Supplementary Planning Document. Developers are advised to refer to the guidance on SUDs contained in section 4.3 of the Southern Staffordshire Outline Water Cycle Study.

Development proposals should be consistent with other local planning policies.”

the Council is looking to replace the adopted plan with its emerging Local Plan Review. Its policies will be considered when they are published.

2 FLOOD RISK

2.1 Flood Risk from Rivers and Watercourses

2.1.1 As shown in Figure 1, the site is shown to be entirely within Flood Zone 1 and as such has a probability of flooding by rivers and watercourses of less than 0.1%. Therefore, the site is not considered to be at risk of flooding from rivers and watercourses.

2.2 Flooding from the Sea

2.2.1 The site is located within Kinver, at a minimum elevation above sea level of 77.3m and at a distance of 98.1km from the sea. Therefore, it can be concluded that the site is not at risk of flooding from the sea.

2.3 Flooding from Land

2.3.1 A source of flood risk to the site is from surface water flooding created by the site itself or adjacent areas. Based on the Surface Water Maps available, see Figure 2 below, the flood risk to the site and the nearby Dunsley Drive is very low from this particular source.

2.3.2 At the time of writing, a site masterplan (and corresponding proposed levels) is currently being developed and this FRA is being prepared to inform it, but it is anticipated that the levels on site are designed such that any potential overland flows generated by the site and the surrounding areas are directed towards the adjacent Dunsley Drive and away from the site.

2.3.3 Therefore, the proposed development will not be affected by surface water flooding and any potential overland flood flows.

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

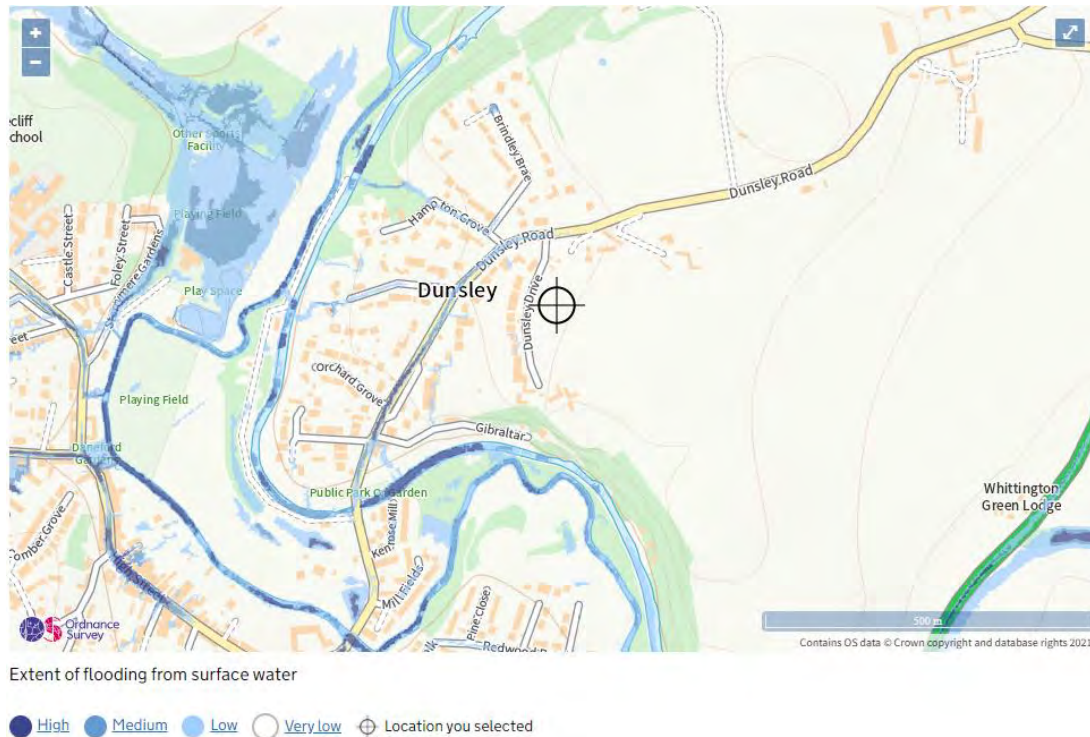


Figure 2: Flooding from Surface Water

2.4 Flooding from Groundwater

2.4.1 The Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment (SFRA), adopted in October 2019 provides an overview of the groundwater flood risk in Southern Staffordshire. It notes there is very little evidence to suggest that groundwater flooding is a major problem in South Staffordshire and that the majority of the region is considered to be at low flood risk from this source. Furthermore, there are no references in the SFRA to historic flooding from groundwater in Kinver.

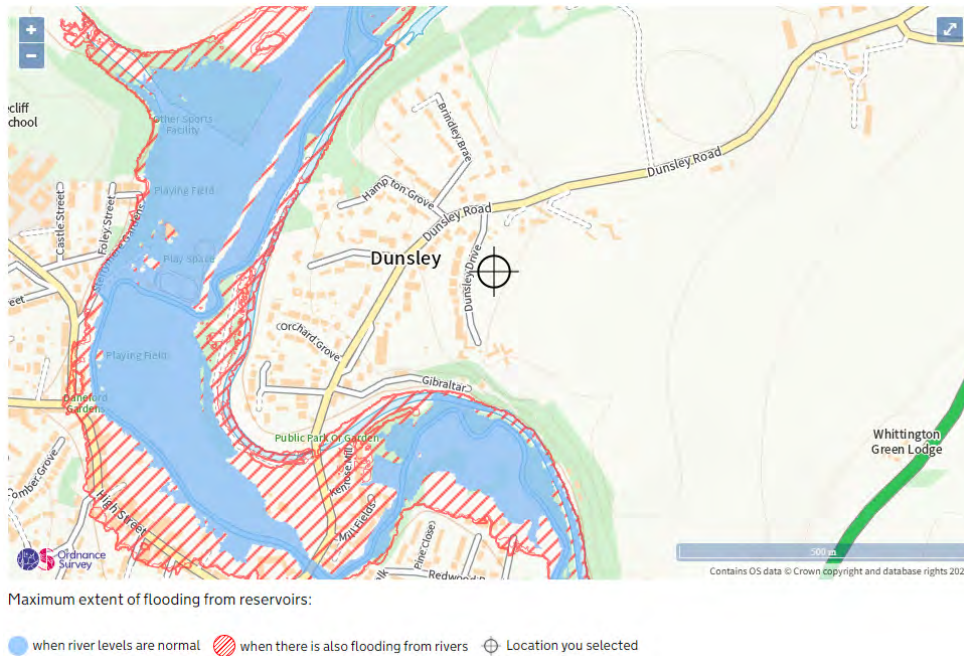
2.4.2 Therefore, it can be concluded that the proposed development is at low risk from flooding by groundwater.

2.5 Flooding from Sewers

2.5.1 Flooding can occur from other sources such as blocked drains and sewers. As mentioned previously in Section 1.6, there is a single foul sewer in the vicinity of the site within Dunsley Road as identified in the correspondence with STW in **Appendix B**. The site is located approximately 3m above Dunsley Road and as such would be protected from flooding caused by the failure of the foul sewer. Additionally, the foul sewer would be adopted by STW, and it can be safely assumed that it is regularly maintained by STW, therefore reducing the risk of flooding by this source. Therefore, the proposed development is at low risk from flooding by blocked drains and sewers.

2.6 Flooding from Reservoirs, Canals and Other Artificial Sources

2.6.1 The reservoir flood map shown in Figure 3 shows the extent of flooding should a canal, reservoir, or other artificial source breach upstream of the development. This shows that the site would not be at risk of flooding from this source and as such this source of flooding is not considered a risk.



3 MITIGATION

3.1 Flood Risk Management

3.1.1 It is recommended that the following flood risk management measures are considered to mitigate the risks identified above:

- The development finished floor levels are set above the existing levels and at least 150mm above the proposed surrounding external levels.
- Wherever possible, the external ground profile in the development will ensure that surface water is directed away from the residential dwellings.
- The proposed development incorporates a positive surface water drainage system, (elaborated on in Section 4), which will intercept runoff from roofs and paved areas before discharging flows into the underlying geology using infiltration SuDS techniques at a rate no higher than the existing infiltration rate.

3.2 Residual Risks

3.2.1 Residual risks are the risks that remain once the flood risk management measures described above have been implemented. These are typically associated with extreme events that overwhelm drainage systems exceeding the flood levels used to design any mitigation measures. The primary residual risks that will affect this development are:

- An extreme rainfall event which exceeds the capacity of the proposed surface water drainage system to both intercept and convey the flows. During such an event, water that is unable to enter the formal drainage system will flow over the ground through the development. The risk can be reduced by designing site levels to direct any runoff towards the highways or other corridors running through the site.
- A rainfall event that exceeds the capacity of surrounding off-site drainage networks could also result in runoff entering the site via routes other than the highways.

4 PROPOSED DRAINAGE STRATEGY

4.1 Outfall Assessment

4.1.1 As required by Part H of Building Regulations and the paragraph 7-080 in Planning Policy Guidance of the NPPF, the required Drainage Hierarchy has been considered in the development of this strategy as summarised below.

Outfall Option	Available Option	Comment
Infiltration Drainage	✓	The use of infiltration outfall is proposed due to the anticipated permeable geology on site, the location of the site within Flood Zone 1 and the apparent absence of groundwater related issues.
Watercourse	n/a	The nearest watercourse, the River Stour is at a great distance of >120m from the site and thus is not a viable option.
Surface Water Sewer	n/a	Not considered. None exist in the vicinity of the site.
Combined Sewer	n/a	Not considered. None exist in the vicinity of the site.

Table 2 – Outfall Assessment

4.1.2 A suitable discharge consent will need to be agreed with the approving body by the contractor prior to completing the connection to the watercourse.

4.2 SuDS Assessment

4.2.1 As part of the surface water drainage strategy for the site a number of Sustainable Drainage Systems were considered. Table 3 below provides a list of the options considered and a justification for their inclusion or omission.

SuDS System	Used	Justification
Rainwater Harvesting System	No	The use of rainwater harvesting is not considered economically viable on this site considering installation and operational costs.
Green Roofs	No	Green roofs have not been proposed for this site as there is insufficient access to roof areas for maintenance and as such the system could not be effectively maintained to ensure long term performance.
Infiltration Systems	Yes	The use of soakaways are feasible on this site due the anticipated geology.

SuDS System	Used	Justification
Proprietary Treatment Systems	No	The use of proprietary treatment systems are not considered economically viable or required on this site considering installation and operational costs.
Filter Strips	No	Filter strips have not been considered the most effective proposal for this site due to the anticipated site layout.
Filter Drains	No	Filter Drains have not been considered the most effective proposal for this site due to the anticipated site layout.
Swales	No	Swales are not suitable for this scheme due to available space and proposed land use.
Bioretention Systems	No	Bioretention Systems have not been considered the most effective proposal for this site due to the lack of available landscape areas.
Porous Pavements	Yes	Porous paving could potentially be employed to treat the most likely source of site contaminates from the residential parking bays and/or private roads. All surface works from the parking areas shall drain via a voided sub-base offering the required treatment. The available storage within the voided sub-base shall provide the required interception.
Attenuation Storage Tanks (oversized pipes)	No	Attenuation tanks or oversized pipes have not been considered for this site due to the available space.
Detention Basins	No	There is insufficient space for a detention basin on this site.
Ponds and Wetlands	No	There is insufficient space for a pond or wetland on this site.

Table 3 – SuDS Assessment

- 4.2.2 This site will be promoted through emerging Local Plan Review seeking its release from Green Belt and proposed allocation for residential development. It is proposed that suitable features will be provided to support both flood risk and water quality as defined by industry standards and local policies.
- 4.2.3 The outline proposals for the drainage system include private storm and foul pipes combined with infiltration systems such as soakaways and porous paving.

4.3 Proposed Surface Water Drainage Strategy

- 4.3.1 It is anticipated that a new drainage system will comprise gutters, down pipes channels, gullies, pipes, and infiltration systems such as soakaways and porous paving. These drainage features will collect runoff from hardstanding areas such as roofs, roads and car parking, before outfalling via infiltration into the surrounding geology by means of soakaways.
- 4.3.2 In accordance with Core Policy 3: Sustainable Development and Climate Change and the Strategic Flood Risk Assessment for the area, it is proposed that the infiltration system is designed for a 100 year

storm plus 40% allowance for climate change. As mentioned previously, at the time of writing a masterplan for the site is being prepared with this report informing the masterplan and a site investigation to determine the soil composition and properties has not been undertaken. Therefore, for the purposes of design it has been assumed that the percentage impermeability of the site is 65% and the design infiltration rate is $1 \times 10^{-5} \text{m/s}$ (0.036m/hr). This design infiltration rate is recommended for loamy soils (assumed for the sandstone bedrock identified in Section 1.4) in Table 25.1 in the SuDS Manual C753. Furthermore, the required total cellular storage volume for the soakaway(s) on site has been found to be approximately 520m^3 . A calculation extract for this required volume and proposed infiltration rate is included in **Appendix C**, which demonstrates the system's performance.

4.4 Foul Water Drainage Strategy

- 4.4.1 In order to establish a foul outfall a developer enquiry was made to STW, the local water authority. As mentioned previously in Section 1.6, there is an existing foul sewer within Dunsley Road which falls in a south-westerly direction. The response to this developer enquiry application confirmed that this foul sewer has sufficient capacity to accept the foul flows from the proposed development and STW would be willing to accept a connection to their network at a preferred location subject to a formal S106 application being made ahead of connection. STW have recommended a connection into Manhole Ref: SO85831803, located to the north west of the site in Dunsley Road, as shown on the STW sewer map included in **Appendix B**.
- 4.4.2 The foul drainage strategy for the site is to convey all foul flows from the development to the proposed connection point in Manhole Ref SO85831803. As discussed above, STW agree with the principal of this connection subject to a formal S106 application. However, if a connection into this manhole is not feasible, a lateral connection into the foul pipe immediately upstream of it may need to be considered.

5 Drainage Management Plan

5.1 Responsibility

5.1.1 For all drainage elements that will be private, the maintenance responsibility shall be with the developer, or a nominated third party, where private assets serve multiple properties. The maintenance requirements are outlined below.

5.2 Maintenance of Pipe Networks

5.2.1 Maintenance and management of main storm sewers and chambers inclusive of pipework from paved areas and buildings (but excluding internal building drainage) should be visually inspected and jetted/cleaned as required. As a minimum, this should be carried out every 5 years. Methods of inspection to give indications of blockages etc. may include:

- Pulling a mandrel through the pipe to identify physical faults (e.g. disjointed pipes).
- Flushing/jetting.
- CCTV.
- Measurement of water depths in pipe entries, catchpits or interceptors along a drain run may identify potentially blocked pipes.

5.2.2 Gully gratings, manhole gratings and channel gratings shall be visually inspected at least once every year and replaced or re-set if damaged or dislodged. Gullies should be inspected at least once every year, ideally during spring time as the autumn and winter seasons produce the most detritus build up in the form of leaves, litter and silt. This material should be removed from the channels and disposed of at a licensed tip. This material should not be tipped in other areas of the development as it may pose a pollution threat to the surrounding drainage system.

5.2.3 Jetting should only be carried out after removal of the silt and debris, as jetting alone will simply wash the debris further downstream without removing the problem.

5.3 Maintenance of SuDS Features

5.3.1 The regular and correct maintenance of the SuDS feature is essential to the continued performance. The SuDS Manual C753 provides advice on the management of the system. The recommended maintenance

regimes for the soakaways and porous paving are given in Table 13.1 and Table 20.15 in the SuDS Manual C753 respectively, which will form the basis of the strategy for the provided development.

TABLE 13.1 Operation and maintenance requirements for soakaways		
Maintenance schedule	Required action	Typical frequency
Regular maintenance	Inspect for sediment and debris in pre-treatment components and floor of inspection tube or chamber and inside of concrete manhole rings	Annually
	Cleaning of gutters and any filters on downpipes	Annually (or as required based on inspections)
	Trimming any roots that may be causing blockages	Annually (or as required)
Occasional maintenance	Remove sediment and debris from pre-treatment components and floor of inspection tube or chamber and inside of concrete manhole rings	As required, based on inspections
Remedial actions	Reconstruct soakaway and/or replace or clean void fill, if performance deteriorates or failure occurs	As required
	Replacement of clogged geotextile (will require reconstruction of soakaway)	As required
Monitoring	Inspect silt traps and note rate of sediment accumulation	Monthly in the first year and then annually
	Check soakaway to ensure emptying is occurring	Annually

Table 5 – Table 13.1 of CIRIA 753

TABLE 20.15 Operation and maintenance requirements for pervious pavements		
Maintenance schedule	Required action	Typical frequency
Regular maintenance	Brushing and vacuuming (standard cosmetic sweep over whole surface)	Once a year, after autumn leaf fall, or reduced frequency as required, based on site-specific observations of clogging or manufacturer's recommendations – pay particular attention to areas where water runs onto pervious surface from adjacent impermeable areas as this area is most likely to collect the most sediment
Occasional maintenance	Stabilise and mow contributing and adjacent areas	As required
	Removal of weeds or management using glyphosate applied directly into the weeds by an applicator rather than spraying	As required – once per year on less frequently used pavements
Remedial Actions	Remediate any landscaping which, through vegetation maintenance or soil slip, has been raised to within 50 mm of the level of the paving	As required
	Remedial work to any depressions, rutting and cracked or broken blocks considered detrimental to the structural performance or a hazard to users, and replace lost jointing material	As required
	Rehabilitation of surface and upper substructure by remedial sweeping	Every 10 to 15 years or as required (if infiltration performance is reduced due to significant clogging)
Monitoring	Initial inspection	Monthly for three months after installation
	Inspect for evidence of poor operation and/or weed growth – if required, take remedial action	Three-monthly, 48 h after large storms in first six months
	Inspect silt accumulation rates and establish appropriate brushing frequencies	Annually
	Monitor inspection chambers	Annually

Table 6 – Table 20.15 of CIRIA 753

5.3.2 It should be noted that maintenance regimes detailed above are initial recommendations and the actual maintenance work undertaken should be adapted to suit the system performance by the maintenance provider.

6 CONCLUSION

- 6.1.1 This site specific Flood Risk Appraisal has been prepared in accordance with NPPF guidance and local policy on Flood Risk. The government approved flood mapping shows the site to be located entirely within Flood Zone 1 and as such is at a very low risk from flood risk from both fluvial and pluvial sources on the site. Further to this, the proposed levels on the site shall be set such that in the unlikely event of these systems failing the development on the site will remain protected.
- 6.1.2 The drainage strategy demonstrated that an appropriate drainage system for both foul and surface water can be provided on the site which discharges to a suitable outfall. Subject to the mitigation measures proposed, the development may proceed without being subject to significant flood risk. Moreover, the development will not significantly increase flood risk to the wider catchment area.

Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDICES



Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDIX A – Site Location Plan



GENERAL NOTES

1. THIS DRAWING SHOULD NOT BE REPRODUCED IN WHOLE OR PART WITHOUT THE WRITTEN CONSENT OF LINK ENGINEERING.
2. DO NOT SCALE FROM THIS DRAWING. UNITS ARE IN METRES UNLESS OTHERWISE SPECIFIED.
3. THE CONTRACTOR IS TO CHECK ALL INFORMATION PROVIDED PRIOR TO COMMENCING WORKS AND SEEK CLARIFICATION FROM THE ENGINEER IN RESPECT TO ANY AMBIGUITIES FOUND.
4. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER SCHEME SPECIFIC DRAWINGS.

KEY

— DEVELOPMENT BOUNDARY

Rev.	Amendments	Date	By
-	INITIAL ISSUE	05.01.22	WJT

Revisions

Client		PROJECT INFORMATION (S2)	
			
 <small>Find us @ www.linkeng.co.uk</small>		PROJECT INFORMATION (S2)	
Project LE21550 - DUNSLEY DRIVE, KINVER			
Drawing LOCATION PLAN			
Scale @ A1 1:1000	Drawn WJT	Checked KL	Rev -

Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDIX B – Severn Trent Water Correspondence and Sewer Records

WONDERFUL ON TAP



Link Engineering
145 LOMBARD HOUSE
GREAT CHARLES STREET
QUEENSWAY
BIRMINGHAM
B3 3LP

Severn Trent Water Ltd
Leicester Water Centre
Gorse Hill
Anstey
Leicester
LE7 7GU

Tel: 0345 266 7930
www.stwater.co.uk

Email:
Network.Solutions@SevernTrent.co.uk

Our ref: 1023952

FAO: James Hall

6th December 2021

Dear Sir/Madam,

Proposed Development: (30 dwellings) – Land off Dunsley Drive, Kinver, Staffordshire, DY7 6NB - 385162, 283759

I refer to your 'Development Enquiry Request' in respect of the above named site. Please find enclosed the sewer records that are included in the fee together with the Supplementary Guidance Notes (SGN) which refer to surface water disposal from development sites.

Protective Strip

No Public sewers within site boundary.

Due to a change in legislation on 1 October 2011 there may be former private sewers on the site which have transferred to the responsibility of Severn Trent Water Ltd, which are not shown on the statutory sewer records, but are located in your client's land. These sewers would require protective strips of 3 metres either side of the sewer's centreline that we will not allow to be built over. If such sewers are identified to be present on the site, please contact us for further guidance.

Foul Water Drainage

Records show closest public sewers are to the north of site boundary, MH SO85831803. Foul flows generated from 40

dwelling around .41 l/s (2xDWF) will have little impact and can be accommodated in the foul network. A gravity connection is therefore acceptable subject to S106 submission.

Note, if the site requires a pump solution then modelling will be required to understand wider impact to downstream network.

Surface Water Drainage

Under the terms of Section H of the Building Regulations 2000, the disposal of surface water by means of soakaways should be considered as the primary method. If these are found to be unsuitable, satisfactory evidence will need to be submitted. The evidence should be either percolation test results or by the submission of a statement from the SI consultant (extract or a supplementary letter).

Note, STW will not allow surface water discharge to the foul network.

Subject to above, Severn Trent Water expects all surface water from the development to be drained in a sustainable way to the nearest watercourse or land drainage channel, subject to the developer discussing all aspects of the developments surface water drainage with the Local Lead Flood Authority (LLFA). Any discharge rate to a watercourse or drainage ditch will be determined by the LLFA / EA.

Connections

For any new connections (including the re-use of existing connections) to the public sewerage system, the developer will need to submit a Section 106 application form. Our Developer Services department are responsible for handling all new connections enquiries and applications. To contact them for an application form and associated guidance notes please call 0800 7076600 or download from www.stwater.co.uk.

Please quote the above reference in any future correspondence (including e-mails) with STW Limited. Please note that Developer Enquiry responses are only valid for 6 months from the date of this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Belal Ali', is centered below the text 'Yours sincerely'. The signature is fluid and cursive, with the first name 'Belal' and the last name 'Ali' clearly distinguishable.

Belal Ali
Network Solutions
Developer Services



Reference	Cover Level	Invert Level Upstream	Invert Level Downstream	Purpose	Material	Pipe Shape	Max Size	Min Size	Gradient	Year Laid
SO84839905	<UNK>	<UNK>	64.3	F	<UNK>	<UNK>	<UNK>	<UNK>	0	31/12/1899 00:00:00
SO85830802	65	<UNK>	64.3	F	VC	C	150	<UNK>	0	31/12/1899 00:00:00
SO85831802	71.46	70.25	69.37	F	VC	C	<UNK>	<UNK>	34.35	31/12/1899 00:00:00
SO85830901	69.41	68.14	<UNK>	F	VC	C	150	<UNK>	0	31/12/1899 00:00:00
SO85831902	77.68	72.58	71.8	F	VC	C	<UNK>	<UNK>	66.92	31/12/1899 00:00:00
SO85831901	74.48	71.79	70.26	F	VC	C	<UNK>	<UNK>	27.97	31/12/1899 00:00:00
SO85830902	70	68.47	73.54	F	VC	C	<UNK>	<UNK>	<UNK>	31/12/1899 00:00:00
SO85833901	79.73	77.99	76.54	F	VC	C	225	<UNK>	20.7	31/12/1899 00:00:00
SO85832901	78.5199	76.53	74.91	F	VC	C	225	<UNK>	23.97	31/12/1899 00:00:00
SO85834901	86.44	83.86	78	F	VC	C	225	<UNK>	23.6	31/12/1899 00:00:00
SO85830701	63.69	61.78	56.17	F	VC	C	<UNK>	<UNK>	15.38	31/12/1899 00:00:00
SO84839902	76	73.53	71.48	F	VC	C	<UNK>	<UNK>	20.15	31/12/1899 00:00:00
SO85831803	72.55	70.8	69.31	F	VC	C	225	<UNK>	21.61	31/12/1899 00:00:00
SO85832801	76.66	74.9	70.85	F	VC	C	225	<UNK>	20.86	31/12/1899 00:00:00
SO85830801	67.49	65.54	61.79	F	VC	C	<UNK>	<UNK>	23.75	31/12/1899 00:00:00
SO84839602	63.51	62.25	56.56	F	VC	C	<UNK>	<UNK>	12.84	31/12/1899 00:00:00
SO85831801	71.1299	69.29	65.55	F	VC	C	<UNK>	<UNK>	26.85	31/12/1899 00:00:00
SO84839900	<UNK>	<UNK>	<UNK>	F	VC	U	150	<UNK>	<UNK>	31/12/1899 00:00:00
<UNK>	<UNK>	<UNK>	<UNK>	F	VC	<UNK>	<UNK>	<UNK>	<UNK>	31/12/1899 00:00:00

LEGEND

<ul style="list-style-type: none"> Ancillary Balancing Lagoon Grease Trap Interceptor Screen Chamber Flushing Chamber Scalway Overflow Fitting Blind Shaft Facility Connector Head Node Lamphole Sewerage Air Valve Sewerage Chemical Injection Point Sewerage Hatch Box Sewerage Pressure Washout Vent Column Waste Water Outfall Control Valve Hydrobrake Penstock 	<ul style="list-style-type: none"> Sewerage Isolation Valve Sewerage Non Return Valve Manhole Foul Bifurcation Manhole Combined Bifurcation Manhole Surface Water Bifurcation Manhole Dual Manhole Foul Single Manhole Combined Single Manhole Surface Water Single Manhole Twin Manhole Foul Adopted Manhole Combined Adopted Manhole Surface Adopted Manhole Transfered Manhole Unsurveyed Manhole Operational Site Waste Water Pump S104 Transfered Asset S102 Null STW Adopted Sewer 	<ul style="list-style-type: none"> None Highway Drain Null Private S24 Storage Disposal Site Off-Line Waste Water Storage On-Line Waste Water Storage Weir Well Waste Water Process Structure S11F Sewage Treatment Point S11F Sewage Treatment Structure S11F Sludge Treatment Point S11F Sludge Treatment Structure Gravily Sewer Pipe Foul Gravity Sewer Combined Gravity Sewer Surface Water Gravity Sewer S104 Surface Water Gravity Sewer S104 Combined Gravity Sewer S104 Foul Gravity Sewer Private Surface Water Gravity Sewer Private Combined Gravity Sewer 	<ul style="list-style-type: none"> Private Foul Gravity Sewer Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Transfered Surface Water Sewer Transfered Combined Sewer Transfered Foul Sewer Disposal Pipe Overflow Pipe Culverted Water Course Waste Internal Site Pipe Sewer Service Connection Gravily Sewer Others Pressure Sewer Pipe Surface Water Pressure Sewer Combined Pressure Sewer Foul Pressure Sewer S104 Surface Water Pressure Sewer S104 Combined Pressure Sewer S104 Foul Pressure Sewer Private Surface Water Pressure Sewer Private Combined Pressure Sewer Private Foul Pressure Sewer Service Pipe 	<ul style="list-style-type: none"> Surface Water Vacuum Sewer Foul Vacuum Sewer Combined Vacuum Sewer S104 Surface Water Vacuum Sewer S104 Combined Vacuum Sewer S104 Foul Vacuum Sewer Private Surface Water Vacuum Sewer Private Combined Vacuum Sewer Private Foul Vacuum Sewer Surface Water Siphon Combined Siphon Foul Siphon Private Surface Water Siphon Private Combined Siphon Private Foul Siphon S104 Surface Water Siphon S104 Combined Siphon S104 Foul Siphon Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Disposal Pipe 	<ul style="list-style-type: none"> Surface Water Lateral Drain Combined Lateral Drain Foul Lateral Drain S104 Surface Water Lateral Drain S104 Combined Lateral Drain S104 Foul Lateral Drain Private Surface Water Lateral Drain Private Combined Lateral Drain Private Foul Lateral Drain Transfered Surface Water Lateral Drain Transfered Combined Lateral Drain Transfered Foul Lateral Drain Print200mLine
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MATERIALS

- NONE
- AC - ASBESTOS CEME
- BR - BRICK
- CC - CONCRETE BOX CULVERT
- CI - CAST IRON
- CO - CONCRETE
- CSB - CONCRETE SEGMENTS (BOLTED)
- CSU - CONCRETE SEGMENTS (UNBOLTED)
- DI - DUCTILE IRON
- GRP - GLASS REINFORCED PLASTIC
- MAC - MASONRY IN REGULAR COURSES
- MAR - MASONRY RANDOMLY COURSED
- PE - POLYETHYLENE
- PF - PITCH
- PP - POLYPROPYLENE
- PSC - POLYVINYL CHLORIDE
- PVC - POLYVINYL CHLORIDE
- RPM - REINFORCED PLASTIC MATRIX
- SI - SPUN (GREY) IRON
- ST - STEEL
- U - UNKNOWN
- VC - VITRIFIED CLAY
- XXX - OTHER

CATEGORIES

- W - WEIR
- C - CASCADE
- DB - DAMBOARD
- SE - SIDE ENTRY
- FV - FLAP VALVE
- BD - BACK DROP
- S - SIPHON
- D - HIGHWAY DRAIN
- S104 - SECTION 104

SHAPE

- C - CIRCULAR
- E - EGG SHAPED
- O - OTHER
- R - RECTANGLE
- S - SQUARE
- T - TRAPEZOIDAL
- U - UNKNOWN

PURPOSE

- C - COMBINED
- E - FINAL EFFLUENT
- F - FOUL
- L - SLUDGE
- S - SURFACE WATER



Severn Trent Water Limited
 Asset Data Management
 PO Box 5344
 Coventry
 CV3 9FT
 Telephone: 0345 601 6616

SEWER RECORD (Tabular)

O/S Map Scale: 1:2,500 This map is centred upon:
 Date of Issue: 06-12-21 X: 385227.07 Y: 283766.10

Disclaimer Statement

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Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDIX C – Hydraulic Calculations


Link Engineering		Page 1
Lombard House 145 Great Charles Street Birmingham, B3 3LP	Dunsley Drive Kinver	
Date 04/01/2022 15:30 File	Designed by WJT Checked by KL	
Innovyze	Source Control 2018.1.1	

Summary of Results for 100 year Return Period (+40%)

Half Drain Time : 1516 minutes.

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m ³)	Status
15 min Summer	0.342	0.342	2.8	178.8	O K
30 min Summer	0.448	0.448	2.8	234.1	O K
60 min Summer	0.556	0.556	2.8	290.4	O K
120 min Summer	0.661	0.661	2.8	345.2	O K
180 min Summer	0.717	0.717	2.8	374.4	O K
240 min Summer	0.751	0.751	2.8	392.5	O K
360 min Summer	0.790	0.790	2.8	412.5	O K
480 min Summer	0.811	0.811	2.8	423.9	O K
600 min Summer	0.822	0.822	2.8	429.6	O K
720 min Summer	0.826	0.826	2.8	431.7	O K
960 min Summer	0.821	0.821	2.8	428.8	O K
1440 min Summer	0.785	0.785	2.8	410.3	O K


Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Time-Peak (mins)
15 min Summer	130.597	0.0	27
30 min Summer	85.825	0.0	41
60 min Summer	53.779	0.0	70
120 min Summer	32.595	0.0	130
180 min Summer	24.012	0.0	190
240 min Summer	19.224	0.0	248
360 min Summer	13.954	0.0	368
480 min Summer	11.125	0.0	486
600 min Summer	9.325	0.0	604
720 min Summer	8.069	0.0	724
960 min Summer	6.417	0.0	962
1440 min Summer	4.640	0.0	1262

Link Engineering		Page 2
Lombard House 145 Great Charles Street Birmingham, B3 3LP	Dunsley Drive Kinver	
Date 04/01/2022 15:30 File	Designed by WJT Checked by KL	
Innovyze	Source Control 2018.1.1	

Summary of Results for 100 year Return Period (+40%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m ³)	Status
2160 min Summer	0.735	0.735	2.8	383.8	O K
2880 min Summer	0.690	0.690	2.8	360.8	O K
4320 min Summer	0.610	0.610	2.8	318.5	O K
5760 min Summer	0.535	0.535	2.8	279.4	O K
7200 min Summer	0.465	0.465	2.8	242.9	O K
8640 min Summer	0.400	0.400	2.8	209.1	O K
10080 min Summer	0.341	0.341	2.8	178.0	O K
15 min Winter	0.384	0.384	2.8	200.6	O K
30 min Winter	0.503	0.503	2.8	262.8	O K
60 min Winter	0.625	0.625	2.8	326.5	O K
120 min Winter	0.745	0.745	2.8	389.1	O K
180 min Winter	0.810	0.810	2.8	423.0	O K
240 min Winter	0.851	0.851	2.8	444.5	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Time-Peak (mins)
2160 min Summer	3.350	0.0	1628
2880 min Summer	2.656	0.0	2020
4320 min Summer	1.912	0.0	2816
5760 min Summer	1.513	0.0	3632
7200 min Summer	1.261	0.0	4400
8640 min Summer	1.086	0.0	5192
10080 min Summer	0.957	0.0	5944
15 min Winter	130.597	0.0	26
30 min Winter	85.825	0.0	41
60 min Winter	53.779	0.0	70
120 min Winter	32.595	0.0	128
180 min Winter	24.012	0.0	186
240 min Winter	19.224	0.0	244

Link Engineering		Page 3
Lombard House 145 Great Charles Street Birmingham, B3 3LP	Dunsley Drive Kinver	
Date 04/01/2022 15:30 File	Designed by WJT Checked by KL	
Innovyze	Source Control 2018.1.1	

Summary of Results for 100 year Return Period (+40%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m ³)	Status
360 min Winter	0.899	0.899	2.8	469.5	O K
480 min Winter	0.928	0.928	2.8	484.7	O K
600 min Winter	0.944	0.944	2.8	493.5	O K
720 min Winter	0.953	0.953	2.8	498.2	O K
960 min Winter	0.956	0.956	2.8	499.7	O K
1440 min Winter	0.929	0.929	2.8	485.6	O K
2160 min Winter	0.862	0.862	2.8	450.4	O K
2880 min Winter	0.803	0.803	2.8	419.8	O K
4320 min Winter	0.686	0.686	2.8	358.3	O K
5760 min Winter	0.572	0.572	2.8	298.9	O K
7200 min Winter	0.466	0.466	2.8	243.3	O K
8640 min Winter	0.369	0.369	2.8	192.6	O K
10080 min Winter	0.282	0.282	2.8	147.3	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Time-Peak (mins)
360 min Winter	13.954	0.0	362
480 min Winter	11.125	0.0	478
600 min Winter	9.325	0.0	594
720 min Winter	8.069	0.0	708
960 min Winter	6.417	0.0	936
1440 min Winter	4.640	0.0	1374
2160 min Winter	3.350	0.0	1740
2880 min Winter	2.656	0.0	2192
4320 min Winter	1.912	0.0	3076
5760 min Winter	1.513	0.0	3928
7200 min Winter	1.261	0.0	4760
8640 min Winter	1.086	0.0	5528
10080 min Winter	0.957	0.0	6248

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Appendix 8: CSA Preliminary Ecological Appraisal



Land at Dunsley Drive,
Kinver

Preliminary Ecological Appraisal

Prepared by
CSA Environmental

on behalf of
Bellway Homes

Report Ref: CSA/5849/01

December 2021

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

Report Reference	Date	Revision	Prepared by	Approved by	Comments
CSA/5849/01	15/12/2021	-	AP	KC	First issue
CSA/5849/01	21/12/2021	A	AP	KC	Final issue.



CONTENTS Page

Executive Summary	1
1.0 Introduction	2
2.0 Legislation, Planning Policy & Standing Advice	3
3.0 Methods	4
Desk Study	4
Field Survey	5
Limitations	5
Evaluation and Assessment	5
4.0 Baseline Ecological Conditions	7
Nature Conservation Designations	7
Habitats and Flora	9
Fauna	11
5.0 Discussion and Recommendations	15
Nature Conservation Designations	15
Habitats and Flora	15
Fauna	16
Summary of Recommendations	16
Opportunities for Ecological Enhancement	16
6.0 Conclusions	18
7.0 References	19

Appendices

Appendix A: Habitats Plan & Photographs

Appendix B: Legislation, Planning Policy and Standing Advice

Appendix C: Desk Study Information

Appendix D: Habitats and Flora Species List

EXECUTIVE SUMMARY

Land at Dunsley Drive, Kinver is to be promoted for new residential development.

CSA Environmental was instructed by Bellway Homes to undertake a Preliminary Ecological Appraisal (PEA) of the Site to identify ecological constraints to development, inform recommendations for design, highlight opportunities for ecological enhancement and determine any additional investigation/survey work necessary.

As part of this PEA, a desk study and extended Phase 1 Habitat survey of the Site were undertaken in September 2021. The Site is comprised of a horse grazed grassland field divided into paddocks, with short, isolated sections of vegetation and shrubs.

No international statutory designations are located within 10km of the Site. One national and one local statutory designation are present within 3km of the Site. The Site lies in close proximity to a number of non-statutory nature designations, including Staffordshire and Worcestershire Canal Biodiversity Action Site (BAS), which is c. 50m south. Potential effects of an increase in visitors to this designation will need to be considered as part of proposals.

Habitats currently present within the Site are generally common and widespread, with the greatest ecological interest associated with the short stretches of boundary vegetation and native semi-mature trees. On-site vegetation and trees should be retained, protected and buffered from development edge effects.

Retention of habitats of higher ecological value, and the delivery of new habitats will help to contribute towards delivering a net gain in biodiversity on-site. Habitat condition assessments should be undertaken to inform baseline information used within the Biodiversity Net Gain calculation.

It is recommended that discussions be opened with the Local Planning Authority to discuss survey scope, namely the need for bat activity surveys, which are not considered to be necessary. A nesting bird check of the on-site stable block should also be undertaken pre-commencement.

There are not anticipated to be any overriding constraints to the principle of development.

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Bellway Homes. It sets out the findings of a Preliminary Ecological Appraisal (PEA) of Land at Dunsley Drive, Kinver (hereafter referred to as 'the Site'). The Site is to be promoted for residential development.
- 1.2 The scope of this appraisal has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017), and to the *Biodiversity: Code of practice for planning and development* (BS 42020:2013) published by the British Standards Institution (2013).
- 1.3 The Site occupies an area of c. 1ha and is located around central grid reference SO 8519 8375, to the east of Kinver. It consists of a single horse-grazed semi-improved grassland field separated into paddocks and bounded by fencing and short stretches of hedge/shrubs (see Habitats Plan in Appendix A).
- 1.4 A desk study and extended Phase 1 Habitat survey were undertaken of the Site, the findings of which are presented herein.
- 1.5 This PEA aims to:
- Identify any ecological constraints to the principle of residential development of the Site
 - Highlight opportunities for ecological enhancements that could be secured through development and to achieve Biodiversity Net Gain
 - Inform illustrative design/spatial planning at the site level
 - Identify further ecological surveys and assessments that may be required to inform a full Ecological Impact Assessment (EclA) of any future proposals.
 - Highlight opportunities for ecological enhancement and Biodiversity Net Gain (BNG)
- 1.6 The scope of this appraisal has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017), and to the *Biodiversity: Code of practice for planning and development* (BS 42020:2013) published by the British Standards Institution (2013).

2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

Legislation

2.1 Legislation relating to wildlife and biodiversity of particular relevance to this PEA includes:

- The Conservation of Habitats and Species Regulations 2017 (as amended)
- The Wildlife and Countryside Act 1981 (as amended)
- The Natural Environment and Rural Communities (NERC) Act 2006
- The Protection of Badgers Act 1992

2.2 This above legislation has been addressed, as appropriate, in the production of this report. Further information on the above legislation is provided in Appendix B.

National Planning Policy

2.3 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government, 2021) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Further details are provided in Appendix B.

2.4 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their effects within the planning system.

Local Planning Policy

2.5 A number of local planning policies relate to ecology, biodiversity and/or nature conservation. These are summarised in Table 1 of Appendix B. These policies have been addressed, as appropriate, in the production of this report.

Standing Advice

2.6 Natural England and Defra's Standing Advice (Natural England & Defra, 2014) regarding habitats and protected species aims to support local authorities and forms a material consideration in determining applications in the same way as any individual response received from Natural England following consultation. Standing advice has therefore been given due consideration, alongside other detailed guidance documents, in the production of this report.

3.0 METHODS

Desk Study

- 3.1 The Multi-Agency Geographic Information for the Countryside (MAGIC) online database was reviewed in November 2021 to identify nature conservation designations within the following search radii:
 - Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites within 10km of the Site (including possible/proposed sites)
 - Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Local Nature Reserves (LNR) within 3km of the Site
 - Other relevant data e.g. Ancient Woodland Inventory within 1km of the Site
- 3.2 A review was undertaken of the location of any such designations, their distance from and connectivity with the Site, and the reasons for their designation. This information was used to determine whether they may be within the Site's zone of influence.
- 3.3 Staffordshire Ecological Record Centre (SER) was contacted for details of any non-statutory nature conservation designations and records of protected/notable habitats and species. This information was requested for an area encompassing the Site and adjacent land within c. 2km of its central grid reference. This search area was selected to include the likely zone of influence upon non-statutory designations and protected or notable habitats and species.
- 3.4 Further online resources were reviewed for information which may aid the identification of important ecological features. The Woodland Trust's online Ancient Tree Inventory was reviewed for known ancient or veteran trees within the Site and adjacent land. Interactive online mapping provided by the charity 'Buglife' was used to determine whether the Site falls within an Important Invertebrate Area.
- 3.5 In accordance with Natural England's Great Crested Newt Mitigation Guidelines (2001), a desktop search was undertaken to identify ponds within 500m of the Site which may have potential to support breeding great crested newts *Triturus cristatus*, using Ordnance Survey (OS) mapping, the MAGIC database and aerial photography.
- 3.6 Where possible under the terms of the data provider, relevant desk study data are presented in Appendix C.

Field Survey

Extended Phase 1 Habitat Survey

- 3.7 An extended Phase 1 Habitat survey was carried out in fine and dry weather conditions on 22 November 2021 by Alex Perry ACIEEM and Lucy Moorhouse, encompassing the Site and immediately adjacent habitats that could be viewed.
- 3.8 Phase 1 Habitat survey is a method of classification and mapping wildlife habitats in Great Britain. It was originally intended to provide "...*relatively rapidly, a record of the semi-natural vegetation and wildlife habitat over large areas of countryside.*" The Phase 1 Habitat survey method has been widely 'extended' beyond its original purpose to allow the capture of information at an intermediate level between Phase 1 and Phase 2 Habitat surveys, and here includes the following:
- More detailed floral species lists for each identified habitat
 - Descriptions of habitat structure, the evidence of management and a broad assessment of habitat condition
 - Mapping of additional habitat types (e.g. hardstanding)
 - Identification of Habitats of Principal Importance in respect of Section 41 (S41) of the NERC Act 2006
 - Identification of Habitats Directive Annex I habitat types
 - Evidence of, or potential for, European Protected Species (EPS) (including bats, great crested newt, dormouse and otter)
 - Evidence of, or potential for, other protected species (including birds, reptiles, water vole, badger and certain invertebrates)
 - Evidence of, or potential for, other notable species (including S41 Species of Principal Importance as well as notable, rare, protected or controlled plants and invertebrates)
- 3.9 Results of the extended Phase 1 Habitat survey are presented on the Habitats Plan in Appendix A. Appendix D provides a list of floral species recorded in each habitat.

Limitations

- 3.10 There were no specific limitations to the desktop study. The extended Phase 1 Habitat survey was undertaken in November, which is outside of the core flowering period for many plant species. As such, some species may have been undetectable.

Evaluation and Assessment

- 3.11 The evaluation and assessment of ecological features is beyond the scope of a PEA and has therefore not been undertaken here. Formal evaluation and assessment of any identified important ecological features should be undertaken as part of either a full EclA, or receptor-

specific survey and assessment in accordance with the published CIEEM method (CIEEM, 2018).

4.0 BASELINE ECOLOGICAL CONDITIONS

Nature Conservation Designations

Statutory

- 4.1 There are no statutory designations covering any part of the Site.
- 4.2 One international statutory designation was identified within 10km of the Site; Fens Pools SAC (c. 7.7km north-east).
- 4.3 One national statutory designations were identified within 3km of the Site; Kinver Edge SSSI (c. 1.3km south-west).
- 4.4 One local statutory designation was identified within 3km of the Site; Kingsford Forest Park LNR (c. 2.1km south-west).
- 4.5 These statutory designations are described in Table 1 below. Based on the reasons for designation of Fens Pool SAC, aquatic bodies noted for amphibian interest, and the distance from the Site, potential impacts to the qualifying features are not anticipated, hence not considered to pose a constraint to the proposed development.
- 4.6 It is likely that residents of the new development will utilise both Kinver Edge SSSI and/or Kingsford Forest Park LNR for recreational opportunities, given their size and proximity to the designation however due to the small scale of the Site, only a small increase in residents and recreation trips is anticipated. The majority of Kinver Edge SSSI is currently in favourable condition, with only southernmost parcels (and further from the Site) in unfavourable recovering (as shown on MAGIC online mapping). The Impact Risk Zones for SSSI's as shown on MAGIC online mapping does not include residential development within the Site area as a potential impact. Similarly, Kingsford Forest Park LNR is managed in such a way to accommodate visitors, and due to the small scale of the Site, the increase in recreational visitors is anticipated to be small. Neither of these designations anticipated to pose a constraint to the principle of development.

Non-Statutory

- 4.7 A total of eight non-statutory designations were identified within 1km of the Site. The nearest of these is Staffordshire and Worcestershire Canal Biodiversity Action Site (BAS), located c. 50m south. These non-statutory designations are described in Table 1 below.
- 4.8 A number of the nearest records are located adjacent to the Staffordshire and Worcestershire Canal, and a small increase in visitors to this designation for recreation may occur as a result of the proposed development. Although the number of dwellings planned at the Site is

small, (up to 35), consideration should be given to the potential impacts relating to an increase in recreation at these designations.

4.9 There are good footpath connections from the Site into Kinver and the canal, and to the east. There is potential that residents of the new dwellings will utilise local designations for recreation, although the total number of new trips is anticipated to be small and dispersed throughout the local area at a range of different designations. The remaining non-statutory designations are not anticipated to pose a constraint to the principle of development.

Table 1. Statutory and Non-Statutory Designations within search radii

Site Name & Designation	Distance & Direction from Survey Area	Special Interests or Qualifying Features
International Designations within 10km		
Fens Pool SAC	c. 7.7km north-east	This site comprises three canal feeder reservoirs and a series of smaller pools supporting an important assemblage of amphibians, including great crested newt <i>Triturus cristatus</i> .
National Designations within 3km		
Kinver Edge SSSI	c. 1.3km south-west	A site supporting a mosaic of heathland, grassland and woodland. A number of notable flora species are present including grey-hair grass <i>Corynephorus canescens</i> . Adder <i>Vipera berus</i> and common lizard <i>Zootoca vivipara</i> are known to persist on the heathland.
Local Designations within 3km		
Kingsford Forest Park LNR	c. 2.1km south-west	Kingsford is located on the edge of a sandstone ridge, supporting open heathland, sandy tracks, pine forests and broadleaved woodland.
Non-Statutory Designations within 2km		
Staffordshire and Worcestershire Canal, Kinver BAS	c. 50m south	The canal has little emergent vegetation, and what there is may have been planted by neighbouring homeowners. There is little floating vegetation. The western bank of the canal beyond the towpath is generally wooded.
Hyde Lock BAS	c. 0.3km west	An area comprising some fields alongside the canal with the River Stour running through the middle. To the north and north west are areas of broad-leaved woodland
The Hyde BAS	c. 0.4km north	A broad-leaved woodland, an area of ruderal vegetation adjacent to the river and a former pond site.
The Hyde (south-west of) BAS	c. 0.4km west	An alder carr woodland (now dried out) with some areas of poor semi-improved grassland. The site is low-lying and has been invaded by Himalayan Balsam which dominates the ground flora, as well as bramble.

Potters Cross (east of) BAS	c. 0.5km west	A young regenerating woodland, a ruderal habitat and a remnant neutral grassland area.
Penhole Coppice and the Bogs, Kinver BAS	c. 0.8km south	This large woodland west of the River Stour and the Staffs and Worcs Canal at Kinver is overgrown and dense with nettles and Himalayan Balsam throughout on the lower section next to the river.
Caunsall (north of) BAS	c. 0.8km south	The area consists mainly of hawthorn, with some dog's mercury, nettle and butterbur along the canal. The withy bed on the east side of the canal has been largely destroyed.
Comber Copse BAS	c. 0.9km south-west	This was probably originally part of the Kinver Edge complex of habitats which adjoins the site to its west. It now consists of an open mixed woodland with little undergrowth in most places.

Ancient Woodland

- 4.10 There is no ancient woodland covering any part of the Site or immediately adjacent land. No trees on or adjacent to Site are listed on the Ancient Tree Inventory.

Habitats and Flora

- 4.11 Habitats recorded on-site were classified in line with current Phase 1 Habitat survey guidance (JNCC, 1990), as illustrated in Appendix A. Detailed species lists for each habitat are provided in Appendix D.

Notable Flora Records

- 4.12 The SER provided 61 records of 14 notable plant species from within the search area. Those of potential relevance to the Site include two records of bluebell *Hyacinthoides non-scripta*, which were located closest to the Site (c. 0.3km north and 0.3km south).
- 4.13 No notable flora was recorded on-site during the field survey.

Semi Improved Grassland

- 4.14 The Site is dominated by short grazed semi-improved grassland. At the time of the field survey, three horses were present.
- 4.15 Post and wire fencing divides the field into various sized paddocks but the floral diversity was found to be consistent throughout. Gates between each of paddocks was open, allowing the horses to graze all areas of the Site.
- 4.16 Due to the sward height and time of year, the number of identifiable plant species recorded within the fields was low, with most species recorded along taller field edges. Species recorded include false oat-grass *Arrhenatherum elatius*, cock's-foot *Dactylis glomerata*, perennial rye *Lolium perenne*, yarrow *Achillea millefolium*, cleavers *Galium*

aparine, dove's-foot cranesbill *Geranium molle*, ragwort *Jacobaea vulgaris*, ribwort plantain *Plantago lanceolata*, greater plantain *Plantago major*, creeping buttercup *Ranunculus repens*, dock *Rumex* sp., chickweed *Stellaria media*, dandelion *Taraxacum officinale* agg., clover *Trifolium* sp., nettle *Urtica dioica*, germander speedwell *Veronica chamaedrys* and periwinkle *Vinca* sp.

Hedges and Trees

- 4.17 Mature, intact hedgerows are generally absent from the Site. For the most part, boundaries comprise short stretches of unmanaged shrubs or small trees.
- 4.18 Boundary B1 lies adjacent to Dunsley Drive and supports short stretches of vegetation and semi-mature trees in places. Species recorded along this boundary include field maple *Acer campestre*, sycamore *Acer pseudoplatanus*, silver birch *Betula pendula*, hawthorn *Crataegus monogyna*, holly *Ilex aquifolium*, blackthorn *Prunus spinosa*, *Prunus* sp., oak *Quercus robur*, bramble *Rubus fruticosus* agg, elder *Sambucus nigra*, snowberry *Symphoricarpos albus* and elm *Ulmus* sp.
- 4.19 Boundary B2 comprises a short stretch of snowberry with small patches of bramble and blackthorn planted as part of an ornamental garden hedge for the dwelling to the south. A semi-mature silver birch tree (c. 8m tall) is located at the easternmost end of the boundary.
- 4.20 The eastern boundary (Boundary B3) comprises a double post and wire fenceline and supports very little vegetation. Small, isolated stands of hawthorn and holly are present along the boundary.
- 4.21 Boundary B4 lies adjacent to a residential garden to the north. A managed ornamental laurel *Laurus* sp. hedge is present in the north-eastern corner. A small off-site tree group is also present in the north-western corner and contains bramble, hawthorn, *Cupressus* sp. and silver birch.
- 4.22 A small tree group comprising yew *Taxus baccata* and holly is present centrally along Boundary B4.

Scrub

- 4.23 A short stretch of scattered bramble scrub is present along Boundary B1 and has begun to colonise into the field through lack of management, with dense bramble scrub also forms part of this boundary.

Other Habitats

- 4.24 Bare ground is present on the Site, predominantly within gateways in the northern paddocks, likely to have been caused by grazing livestock.
- 4.25 A small corrugated-metal stable (S1) is located in the north of the Site; it has three stable doors on the southern side, and is in use by the on-site

horses. The inside of the building is lined with plywood; gaps in the roof and along the top of the plywood are extremely cobwebbed.

- 4.26 A small area in the north-western corner of the Site is currently used as storage for horseboxes, although at the time of the survey it appeared that this area had not been recently accessed.

Fauna

Bats

- 4.27 A total of 279 bat records were identified within the search area, dating from 1988 to 2019. They include the following species: common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula*, brown long-eared *Plecotus auritus*, **Leisler's bat** *Nyctalus leisleri*, serotine *Eptesicus serotinus*, **Natterer's bat** *Myotis natterii*, **Daubenton's bat** *Myotis daubentonii*, *Myotis* sp. and lesser horseshoe *Rhinolophus hipposideros* bats. The closest records are of common pipistrelle, soprano pipistrelle, noctule and serotine bat species within a four-figure grid square, located c. 0.2km north-west at its closest point.
- 4.28 Suitable habitat on-site for bats is limited, with well vegetated dispersal corridors generally absent, with the short grazed grassland on-site providing limited foraging opportunities.
- 4.29 The on-site building (S1) was assessed for its potential to support roosting bats. The high internal light levels from open doors, metal construction of the building and regular use reduces the suitability of the structure for use by day roosting bats. In addition, high levels of cobwebs were recorded around the ceiling and walls, indicating lack of activity in these areas by bats. A systematic search was undertaken to look for evidence of feeding by bats, with none recorded. On balance of the above, the building was found to have negligible potential for roosting bats.
- 4.30 As stated above, the structure on-site offers limited potential for day roosting bats and trees with bat roosting potential are absent from the Site.

Badger

- 4.31 The SER have provided 20 records of badger *Meles meles* from within the search area, dating from 1998 to 2018, the closest of which are c. 1km south-west from the Site and comprise road casualties along the A449.
- 4.32 Vegetation on-site has limited potential to support to support sett-building activity, with suitable habitat limited to dense scrub on the western boundary. No setts, latrines or other evidence of badger was recorded during the survey.

Dormouse

- 4.33 No records of dormouse *Muscardinus avellanarius* were returned in the data search.
- 4.34 Woody vegetation on the Site comprises short, isolated sections. Connectivity between the Site and areas of suitable high quality habitat such as parcels of woodland is generally absent. The nearest woodland parcel is located adjacent to the canal corridor but separated from the Site by housing and residential development. On the basis of the absence of biological records in the area, and the sub-optimal habitats on-site, this species is not anticipated to pose a constraint to the principle of development.

Riparian Mammals

- 4.35 No records of water vole *Arvicola amphibius* were returned in the data search.
- 4.36 A total of 17 records of otter *Lutra lutra* were identified within the search area, dating from 1998 to 2017. Of the records returned, 11 relate to locations along the Staffordshire and Worcestershire Canal, with the nearest records c. 0.2km south of the Site.
- 4.37 Despite the nearby canal corridor, no suitable aquatic or terrestrial habitats are present on-site for water vole, who rely on vegetated streams and ditches for dispersal and sheltering. Whilst otters are known to deviate from canal corridors onto nearby terrestrial land, on-site habitat offers a closely grazed grassland sward with no significant dense vegetation sufficient to provide shelter. Whilst otters may rarely disperse across the Site if in the area, the Site is not likely to form a significant part of their territory. Riparian mammals are not considered to pose a constraint to the principle of development.

Other Mammals

- 4.38 No records of brown hare *Lepus europaeus* or harvest mouse *Micromys minutus* were returned in the data search.
- 4.39 Brown hare rely on open areas of habitat, such as large arable fields. Open farmland is present to the east of the Site, with only the fence line separating the Site from the open landscape. As such, it is possible that brown hare may use on-site habitats, but a notable population is not likely to be present.
- 4.40 Harvest mouse typically utilises tall grassland or reedbed habitats, which are absent from the Site.
- 4.41 The data search returned eight records of hedgehog *Erinaceus europaeus* from within the search area. All records are located within the residential area of Kinver on the opposing side of the Staffordshire

and Worcestershire Canal. The nearest record is located c.0.9km south-west.

- 4.42 Hedgehogs may use the short stretches of on-site vegetation for dispersal and grassland for foraging. A notable assemblage of hedgehogs is not thought to be present due to the lack of cover available for sheltering and limited foraging opportunities within short-sward grassland.
- 4.43 The above species are not anticipated to pose a constraint to the principle of development

Birds

- 4.44 A total of 3020 records of 71 bird species were identified within the search area, dating from 1948 to 2019. Most of the bird records returned in the data search are for four-figure grid references rather than specific locations. Those of potential relevance to the Site include skylark *Alauda arvensis*, mallard *Anas platyrhynchos*, black-headed gull *Chroicocephalus ridibundus*, lesser black-backed gull *Larus fuscus*, grey wagtail *Motacilla cinerea*, house sparrow *Passer domesticus*, dunnock *Prunella modularis* and mistle thrush *Turdus viscivorus* located within a km grid square, c. 0.2km north at the closest point.
- 4.45 The short grazed grassland and small sections of vegetation offer limited opportunities for birds. It is likely that breeding generalists will utilise on-site vegetation but a notable assemblage is not likely to be present.
- 4.46 The building was inspected for evidence of nesting swallow/swift/house martin activity, with none recorded. It is possible that the stable offers nesting habitat for these species.

Reptiles

- 4.47 A total of 21 records of three reptile species were identified within the search area including slow worm *Anguis fragilis*, adder *Vipera berus* and common lizard *Zootoca vivipara*. The majority of records are located at Kinver Edge, c. 1.5km west and on the opposite site of the canal, with most of the remaining records recorded at Million Plantation, c. 1.7km north.
- 4.48 Habitats on-site are well maintained through grazing and as such sward height at the grassland is low. The habitat mosaic required by reptiles is generally absent. Reptiles are not anticipated to pose a constraint to development.

Amphibians

- 4.49 A total of two records common toad *Bufo bufo* were returned in the data search, both records are located at Kinver Edge, with the nearest c. 1.6km west. There were no records of great crested newt.

- 4.50 A more detailed appraisal of the Site in respect of great crested newt is provided below.

Great Crested Newt

- 4.51 On-site habitats are mostly unsuitable for terrestrial great crested newts, with short-grazed grassland dominating the Site. Whilst short sections of hedge and scrub may support this species, opportunities are limited.
- 4.52 Despite spending much of their annual lifecycle within the terrestrial environment, great crested newts are dependent upon the presence of suitable aquatic breeding habitat in order for a population to persist. No potential breeding ponds were identified on-site during the site survey, while one appears to be present within a dispersible range of the Site, based on OS mapping, c. 0.3km north.
- 4.53 Given that the pond is located over 250m from the Site (typical dispersal distance for great crested newts), and well-connected, good quality terrestrial habitat is absent from the Site, this species is not likely to pose a constraint to the principle of development.

Invertebrates

- 4.54 A total of 417 records of 159 invertebrate species were identified within the search area. The nearest record is for small heath *Coenonympha pamphilus*, located c. 0.2k north. The majority of records relate to surveys undertaken at designated sites such as Kinver Edges and Gibbetts Wood. As such, invertebrates recorded within these designations will likely rely on specific habitats which are not present on-site. The Site is not situated within an Important Invertebrate Area (IIA).
- 4.55 The closely grazed habitats and short stretches of vegetation are likely to support a range of generalist invertebrate species, therefore it is unlikely that a notable assemblage is present and as such, invertebrates are not considered to pose a constraint to the principle of development.

5.0 DISCUSSION AND RECOMMENDATIONS

Nature Conservation Designations

Non-Statutory

Staffordshire and Worcestershire Canal BAS

- 5.1 The Staffordshire and Worcestershire Canal BAS is located close to the Site and it is possible that there may be an increase in recreation visits as a result of the proposed development. Although the number of new dwellings is low and the number of additional visits is considered to be low, measures should be considered to maximise on-site recreational opportunities within the development thereby reducing the number of visitors to the canal path.

Other Non-Statutory Designations

- 5.2 Although the remaining designations are not anticipated to pose a constraint to development, measures should be taken on-site to provide local alternative recreational opportunities for new residents, to further minimise the number of additional trips to nearby non-statutory designations.

Habitats and Flora

- 5.3 Emerging legislative frameworks and policy seeks to leave biodiversity in a better state than prior to development, i.e. development should deliver a Biodiversity Net Gain (BNG).
- 5.4 The Site is dominated by habitats of limited ecological interest. Development of the Site would present opportunities to deliver measurable ecological enhancement through habitat restoration or creation alongside proposals, i.e. as part of the Site's green infrastructure provision. Subject to scheme design, it is considered that such measures are likely to be capable of delivering BNG on-site.
- 5.5 It is recommended that the scheme design be informed by the application of a 'Biodiversity Impact Assessment Calculation', making use of the latest Biodiversity Metric (Version 3.0 at the time of writing) published by Natural England, to provide a quantitative assessment of losses or gains in biodiversity. This will enable future planning applications to be made in-line with emerging legislative frameworks and policy.

Hedges and Trees

Short stretches of vegetation and occasional semi-mature trees are present on-site. Hedges present along Boundary B2 and the east of Boundary B4 comprise ornamental features, offering lower ecological value than unmanaged, native features. Existing gaps in vegetation

should be subject to infill planting to create intact, species-rich features and increase connectivity to the wider landscape.

- 5.6 Where possible, trees on and adjacent to the Site should be retained and protected as part of proposals. New tree planting should be provided as part of on-site landscaping to provide habitat diversity and in time, mature features.

Fauna

Bats

- 5.7 Due to the unsuitability of the on-site stable for roosting, and the absence of suitable foraging and dispersal habitats on-site for bats, further survey work has not been recommended. Discussions should be opened with the LPA to confirm whether they are in agreement

Breeding Birds

- 5.8 The on-site stable has potential to support nesting swallow/swift or house martin. A pre-commencement check should be undertaken to determine whether the building is in use by nesting birds. If nesting birds are present, a Construction Exclusion Zone should be implemented around the building until checks have fledged.

Summary of Recommendations

- 5.9 Based on the ecological constraints identified above, Table 2 summarises recommendations for further work necessary to determine the need for, and scope of, any avoidance, mitigation and/or compensation measures to address potential adverse effects of development.

Table 2. Recommendations for further investigation/survey

Ecological Feature	Further Work	Applicable Timescales
Biodiversity Net Gain	Habitat condition assessments in the suitable season	April - July
	Production of Metric	Pre-planning
LPA Consultation	To discuss survey scope and confirm that bat surveys are not anticipated.	Pre-planning
Breeding Birds	Nesting bird check of stable block	Pre-commencement

Opportunities for Ecological Enhancement

- 5.10 To promote adherence to the NPPF and Core Policy 2 of the South Staffordshire Core Strategy 2012 the following opportunities for ecological enhancement have been identified:

- Aquatic habitat creation to provide new aquatic opportunities and increase biodiversity, potentially to the south of the Site where the land drops away towards the canal.
- Incorporation of native plants and those of wildlife importance in to landscaping scheme to provide foraging opportunities for birds, invertebrates and bats
- Improved connectivity of green infrastructure with new hedgerow planting and infill planting along existing boundaries, particularly along the eastern boundary
- New tree planting along boundaries and within the Site to offer habitat diversity and increased tree cover
- Delivery of new thicket and wildflower planting at the Site, along boundaries if possible, to provide habitat diversity and increase connectivity to the wider landscape
- Provision of new bat roosting opportunities within new buildings
- Provision of bird nesting opportunities within new buildings, including swallow cups to account for the loss of potential nesting habitat within the stable block
- Provision of hedgehog gaps in new fencing to promote habitat connectivity across and within the Site

6.0 CONCLUSIONS

- 6.1 Confirmed ecological constraints to development at the Site have been identified as the presence of:
- Worcestershire and Staffordshire Canal BAS
 - Hedges and Trees
- 6.2 It is recommended that habitat condition assessments be undertaken in the suitable season, and Biodiversity Net Gain calculation undertaken using the latest Metric.
- 6.3 Discussions should be opened with the Local Planning Authority to discuss the conclusions of this report.
- 6.4 Recommendations for ecological enhancement measures that could be delivered as part of development at the Site have been provided here-in, which will aid accordance with the South Staffordshire Core Strategy.
- 6.5 No overriding constraints to development have been identified subject to the implementation of appropriate mitigation measures in respect of confirmed ecological constraints, and further recommended survey work.

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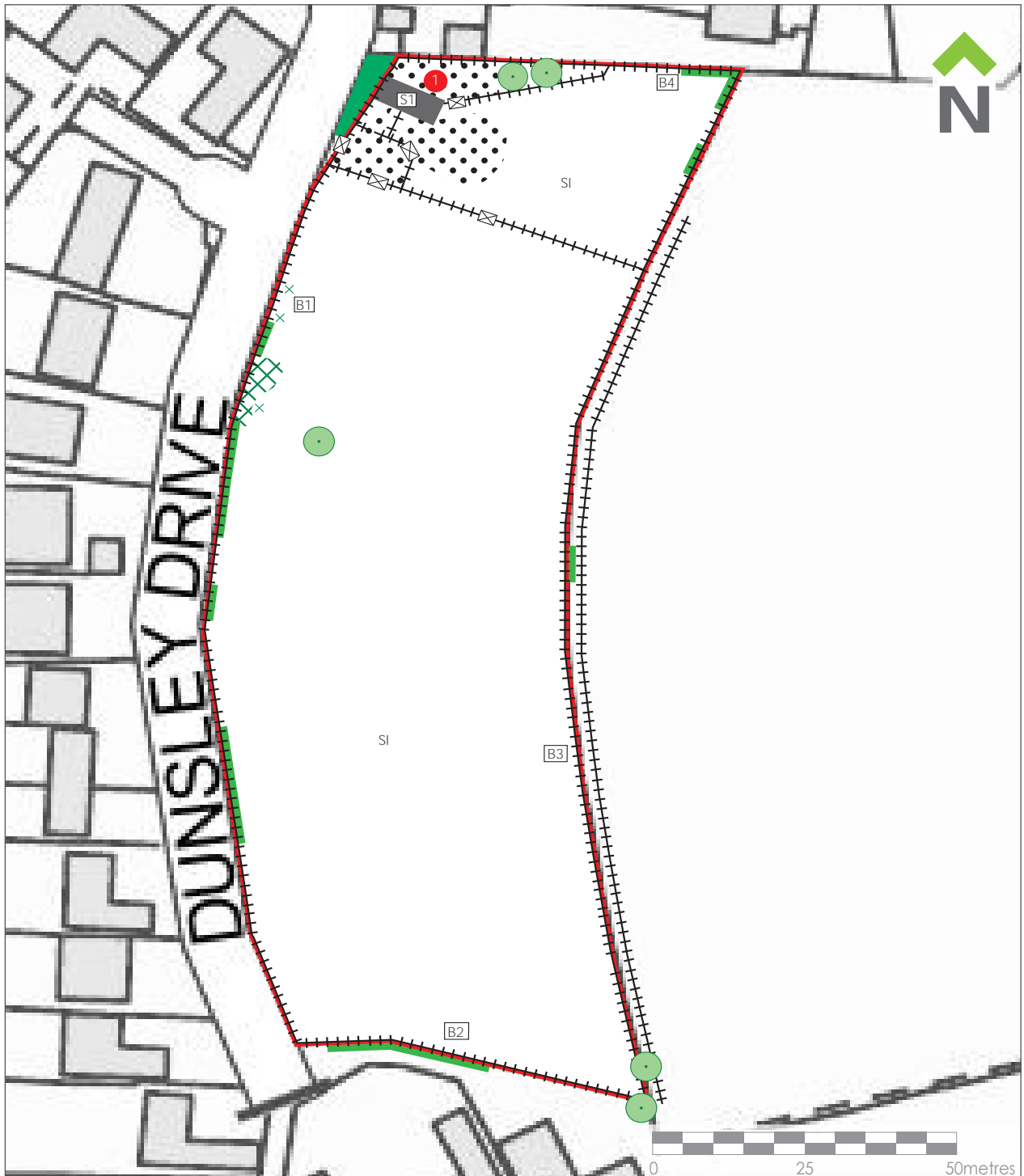
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Appendix A
Habitats Plan & Photographs



	Site boundary		Hedge/woody vegetation		Gate
	Semi-improved grassland		Individual tree (Indicative location)		Boundary reference
	Native tree group		Bare ground		Structure reference
	Dense scrub		Building		Target note: 1. Horsebox storage area
	Scattered scrub		Fence		

<p>Suite 1, Deer Park Business Centre, Eckington, Pershore WR10 3DN</p> <p>t 01386 751100 e pershore@csaenvironmental.co.uk w csaenvironmental.co.uk</p>	<p>Project Land at Dunsley Drive, Kinver</p>	<p>Drawing No. CSA/5849/100</p>	<p>Rev -</p>
	<p>Drawing Title Habitats Plan</p>	<p>Scale Refer to scale</p>	<p>Drawn LM</p>
	<p>Client Bellway Homes</p>	<p>Date December 2021</p>	<p>Checked AP</p>



Photograph 1. View of the Site, looking south.



Photograph 2. On-site storage area to north.



Photograph 3. Boundary B1.



Photograph 4. Boundary B3.



Photograph 5. View of on-site structure, looking north



Photograph 6. View of the Site, looking north.

Appendix B

Legislation and Planning Policy

- 1.1. The Conservation of Habitats and Species Regulations 2017 (as amended) make prescriptions for the designation and protection of Sites of Community Importance ('European sites', i.e. Special Areas of Conservation and Special Protection Areas) and European Protected Species (EPS). The latter include all native bats, great crested newts, dormice, otters and certain reptiles, listed under Annex II of the Regulations. Following the UK's departure from the European Union, the provisions of the Regulations have been retained through enactment of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which came into force on 31 December 2020.
- 1.2. The Wildlife and Countryside Act 1981 (as amended, principally by the Countryside and Rights of Way Act 2000) forms the basis for protection of statutory designated sites of national importance (e.g. Sites of Special Scientific Interest; SSSIs) and native species that are rare and vulnerable in a national context. Additionally, badgers are protected under the Protection of Badgers Act 1992.
- 1.3. Section 40(1) of the Natural Environment and Rural Communities (NERC) Act 2006 states that each public authority, "must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity." This legislation makes it clear that planning authorities should consider impacts to biodiversity when determining planning applications, with particular regard to the Section 41 (S41) lists of 56 habitats and 943 species of principal importance. The UK Biodiversity Action Plan (BAP) has been superseded by the Biodiversity 2020 Strategy, however Local BAPs continue to influence biodiversity management and conservation effort, including through the spatial planning system, at the local scale.
- 1.4. The National Planning Policy Framework (2021) (NPPF) sets out government planning policies for England and how they should be applied. With regards to ecology and biodiversity, Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 174, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 1.5. Paragraph 180 sets out the principles that local planning authorities should apply when determining planning applications:
 - If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts).
 - Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the

development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.

- Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

1.6. The Government Circular 06/2005, which is referred to within the NPPF, defines statutory nature conservation sites and protected species as a material consideration in the planning process.

1.7. Local planning policies of relevance to ecology, biodiversity and/or nature conservation have been set out in Table 1 below.

Table 1. Summary of regional and local planning policy relating to ecology

Policy	Summary
South Staffordshire Core Strategy Adopted 2012	
Core Policy 2: Protecting and Enhancing the Natural and Historic Environment	<p>The Council will support development or other initiatives where they protect, conserve and enhance the District's natural and heritage assets including ecological networks internationally, nationally and locally important designations. Particular support will be given to initiatives to improve the natural environment where it is poor and increase the overall biodiversity of the District including the development of green infrastructure links and to improve the historic environment where it is identified as at risk.</p> <p>Development or initiatives will generally be supported which:</p> <ul style="list-style-type: none"> a) will not have a detrimental impact upon the interests and significance of a natural or heritage asset; b) are not contrary to the control of development within internationally, nationally or locally designated areas including the Green Belt and Open Countryside, Cannock Chase Area of Outstanding Natural Beauty and Motte Meadows Special Area of Conservation, and contribute to the conservation and enhancement of the character of the landscape and local distinctiveness; c) are consistent with the sustainable management of the asset including the repair and reuse of historic buildings; d) protect and improve water and air quality; e) provide mitigation or compensatory measures to address any potential harmful implications and supporting enhancement measures.

Policy	Summary
	<p>Development proposals should be consistent with the NPPF, the Supplementary Planning Documents on the Historic Environment and Biodiversity and other local planning policies.</p> <p>Development proposals should have regard to and support the actions and objectives of the Severn and Humber River Basin Management Plans (RBMPs) and also have regard to the River Severn and River Trent Catchment Flood Management Plans (CFMPs).</p>
<p>Policy EQ1: Protecting, Enhancing and Expanding Natural Assets</p>	<p>Permission will be granted for development (alone or in combination) which would not cause significant harm to sites and/or habitats of nature conservation, geological or geomorphological value, including ancient woodlands and hedgerows, together with species that are protected or under threat. Support will be given to proposals which enhance and increase the number of sites and habitats of nature conservation value, and to meeting the objectives of the Staffordshire Biodiversity Action Plan (SBAP).</p> <p>In line with the objectives of the Water Framework Directive (WFD), development proposals must not adversely affect the ecological status of a water body and wherever possible take measures to improve ecological value in order to help meet the required status.</p> <p>International Sites Any proposed development that could have an adverse affect on the integrity of an international wildlife, geodiversity or landscape site (e.g. Natura 2000 or Ramsar site, Special Area of Conservation) or on ground water flows to those sites, alone or in combination with other plans or projects, will not be permitted unless it can be demonstrated that the legislative provisions to protect such sites can be fully met.</p> <p>National Sites Protected wildlife, geodiversity and landscape sites designated under national legislation are shown on the Policies Map [e.g. Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs)] and will be protected under the terms of that legislation.</p> <p>Local Sites Locally important sites are also identified [e.g. Sites of Biological Importance (SBIs), Regionally Important Geological Sites (RIGs), Local Nature Reserves (LNRs)] and will be protected and enhanced. Outside the areas designated, the interests of nature conservation must be taken into account in accordance with national guidance.</p> <p>The restoration or creation of new habitats and the expansion of habitats in South Staffordshire will be supported where these contribute to priorities in the UK Biodiversity Action Plan and the Staffordshire Biodiversity Action Plan including priority habitats such as native woodland, hedgerows, and lowland heathland. Areas or sites for the restoration or creation of biodiversity priority</p>

Policy	Summary
	<p>habitats will be identified through Biodiversity Opportunity Mapping working in partnership with Natural England, Staffordshire Wildlife Trust and Staffordshire County Council.</p> <p>Wherever possible, development proposals should build in biodiversity by incorporating ecologically sensitive design and features for biodiversity within the development scheme. Development proposals should be consistent with the Supplementary Planning Document.</p>

Appendix C

Desk Study Information



Legend

-  Ramsar Sites (England)
-  Proposed Ramsar Sites (England)
-  Special Areas of Conservation (England)
-  Possible Special Areas of Conservation (England)
-  Special Protection Areas (England)
-  Potential Special Protection Areas (England)

Projection = OSGB36

xmin = 353000

ymin = 268000

xmax = 416500

ymax = 299000



Map produced by MAGiC on 15 November, 2021.
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Site Check Report Report generated on Mon Nov 15 2021
You selected the location: Centroid Grid Ref: SO85218375
The following features have been found in your search area:

Special Areas of Conservation (England)

Name	FENS POOLS
Reference	UK0030150
Hectares	20.24
Hyperlink	http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?euocode=UK0030150

Ramsar Sites (England)

No Features found

Proposed Ramsar Sites (England)

No Features found

Possible Special Areas of Conservation (England)

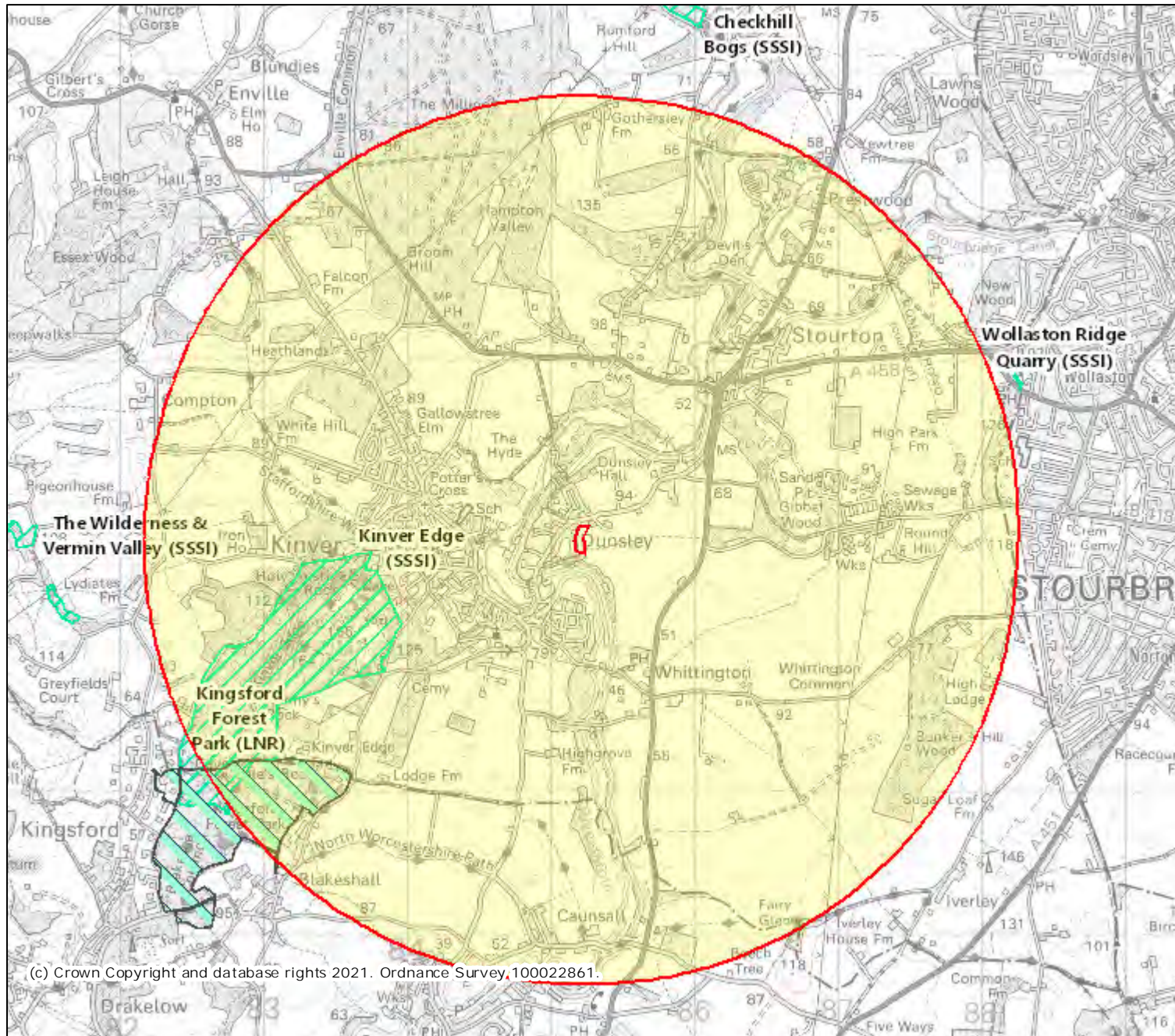
No Features found

Special Protection Areas (England)

No Features found

Potential Special Protection Areas (England)

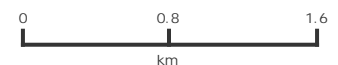
No Features found



Legend

-  Local Nature Reserves (England)
-  National Nature Reserves (England)
-  Sites of Special Scientific Interest (England)

Projection = OSGB36
 xmin = 377000
 ymin = 280000
 xmax = 393600
 ymax = 287800



Map produced by MAGiC on 3 December, 2021.
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Site Check Report Report generated on Fri Dec 03 2021
You selected the location: Centroid Grid Ref: SO85218375
The following features have been found in your search area:

Local Nature Reserves (England)

Reference	1082915
Name	KINGSFORD FOREST PARK
Hectares	80.76
Hyperlink	https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1082915

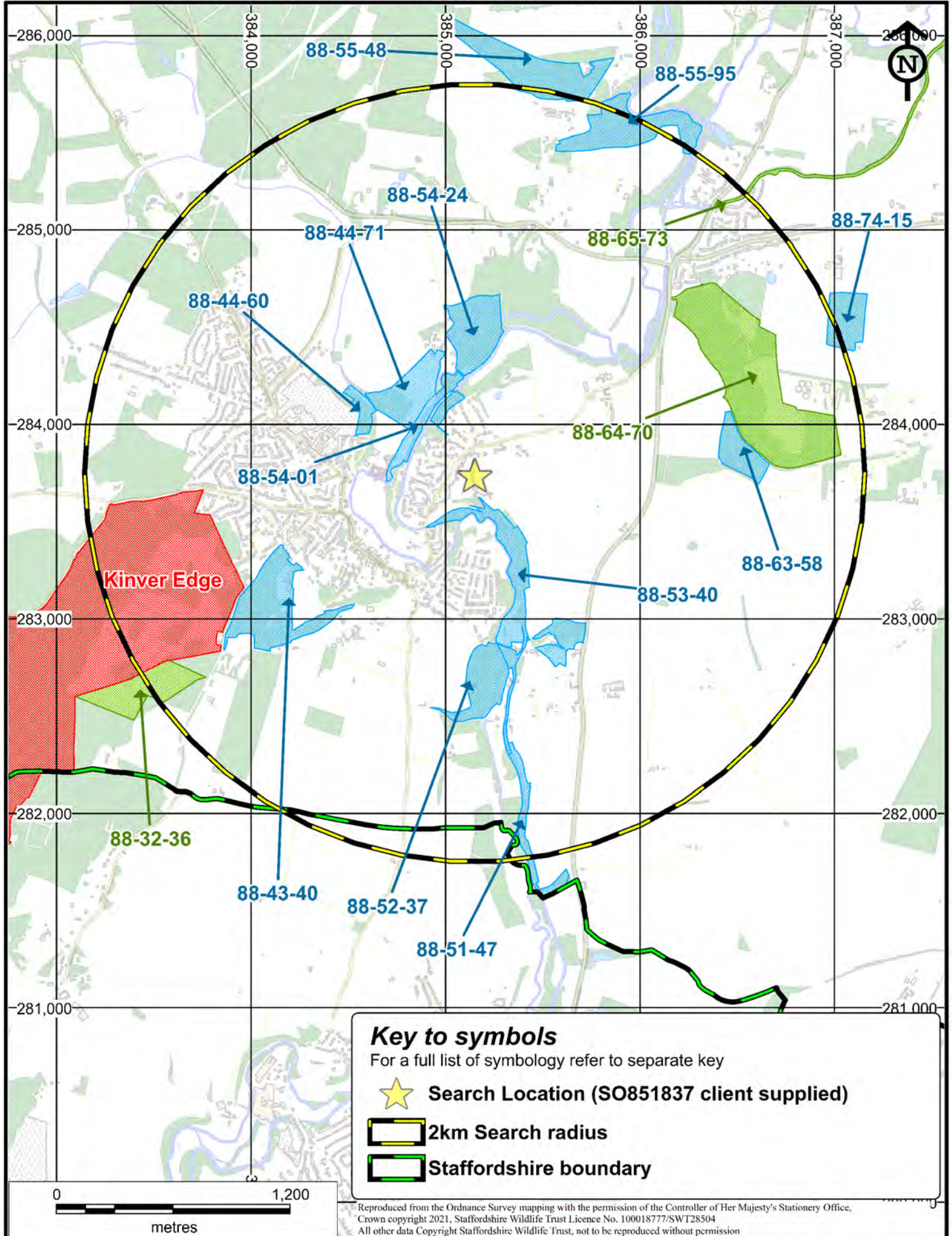
Sites of Special Scientific Interest (England)

Name	Kinver Edge SSSI
Reference	1002238
Natural England Contact	Area Team West Midlands
Natural England Phone Number	0845 600 3078
Hectares	124.2
Citation	1000202
Hyperlink	http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1000202

National Nature Reserves (England)

No Features found

**Nature Conservation Sites
 within 2km of Dunsley Drive, Kinver (SO851837)**



Appendix D

Habitats and Flora Species List

Table D. Habitats and Flora Species List							
Site name	Land at Dunsley Drive, Kinver						
Survey date and surveyor	22/11/2021 AP/LM						
Scientific name	Common name	Habitat Type					
		F1	F2	B1	B2	B3	B4
Herb species							
<i>Achillea millefolium</i>	Yarrow	X	X				
<i>Galium aparine</i>	Cleavers	X	X				
<i>Geranium molle</i>	Dove's-foot cranesbill	X	X				
<i>Jacobaea vulgaris</i>	Common ragwort	X	X				
<i>Plantago lanceolata</i>	Ribwort plantain	X	X				
<i>Plantago major</i>	Greater plantain	X	X				
<i>Ranunculus repens</i>	Creeping buttercup	X	X				
<i>Rumex</i> sp.	Dock	X	X				
<i>Stellaria media</i>	Common chickweed		X				
<i>Taraxacum officinale</i> agg.	Dandelion	X					
<i>Trifolium</i> sp.	Clover	X	X				
<i>Urtica dioica</i>	Common nettle	X	X				
<i>Veronica chamaedrys</i>	Germander speedwell		X				
<i>Vinca</i> sp.	Periwinkle	X					
Grasses							
<i>Arrhenatherum elatius</i>	False oat-grass	X					
<i>Dactylis glomerata</i>	Cock's-foot	X	X				
<i>Lolium perenne</i>	Perennial rye grass	X	X				
Woody species							
Coniferous							
<i>Cupressus</i> sp.	Cypress sp.						X
<i>Taxus baccata</i>	Yew						X
Broadleaved							
<i>Acer campestre</i>	Field maple			X			
<i>Acer pseudoplatanus</i>	Sycamore			X			
<i>Betula pendula</i>	Silver birch			X	X		X
<i>Crataegus monogyna</i>	Hawthorn			X		X	
<i>Ilex aquifolium</i>	Holly			X		X	X
<i>Ilex</i> sp.	<i>Ilex</i> sp.			X			
<i>Laurus</i> sp.	Laurel						X
<i>Prunus spinosa</i>	Blackthorn			X	X		
<i>Prunus</i> spp.	Prunus (domesticated)						X
<i>Quercus</i> sp.	Oak			X			
<i>Rubus fruticosus</i> agg.	Bramble			X	X		
<i>Sambucus nigra</i>	Elder			X			X
<i>Symphoricarpos albus</i>	Snowberry			X	X		
<i>Ulmus</i> spp.	Elm			X			



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**Appendix 9: Barton Hyett Associates / CSA
Arboriculture Survey**

ARBORICULTURAL SURVEY REPORT

Land off Dunsley Drive,
Kinver

March 2022



Barton Hyett Associates

Arboricultural Consultants

In association with

CSA
environmental

Summary table		
Site Name:	Land off Dunsley Drive, Kinver	
Project reference:	4927	
Site Address:	Dunsley Drive, Kinver, Stourton, South Staffordshire,	
Nearest Postcode:	DY7 6NB	
Central Grid reference:	<u>SO 85199 83759</u>	
Local Planning Authority:	South Staffordshire Council	
Relevant planning policies:	South Staffordshire Core Strategy 2012 - 2028 - CS7 Environmental Quality; CS4 Vision for South Staffordshire; CS6 The Spatial Strategy	
Statutory Controls:	Tree Preservation Order	Conservation Area
	None	No
Soil Type: (Source: BGS online soils map © NERC 2022)	Superficial/Drift	Bedrock
	No superficial deposits recorded	Chester Formation - Sandstone and conglomerate, interbedded
Topographical Survey:	Drawing No: 38125NGLS-02, dated: 06-12-2021	
Notes:	No ancient or veteran trees recorded.	
Report author:	David Holmes <i>FdSc, MArborA</i>	
Checked by:	Paul Barton MSc, BSc (Hons), MArborA, RCarborA	
Date of issue:	30th March 2022	

REPORT CONTENTS:

SECTION 1:	SUMMARY, SITE DETAILS & SURVEY FINDINGS
SECTION 2:	TREE SURVEY & CONSTRAINTS PLAN
SECTION 3:	TREE SURVEY SCHEDULE & SITE IMAGES
SECTION 4:	METHODOLOGY
SECTION 5:	DESIGN GUIDANCE AND GENERIC ADVICE

THIS REPORT HAS BEEN PREPARED TO PROVIDE ADVICE AND GUIDANCE ON THE POTENTIAL FOR DEVELOPMENT OF LAND IN RELATION TO TREES. IT IS THEREFORE INTENDED FOR 'INTERNAL USE' ONLY BY THE NAMED CLIENT AND DESIGN TEAM. IT MAY NOT THEREFORE BE SUITABLE FOR SUBMISSION TO A PLANNING AUTHORITY WITH A PLANNING APPLICATION.

1. INSTRUCTION

- 1.1. I am David Holmes, an arboriculturist with 13 years of experience, and a professional member of the Arboricultural Association.
- 1.2. Barton Hyett Associates Ltd have been instructed to survey trees located at land east of Dunsley Drive, Kinver ('the site') in accordance with the recommendations of British Standard 5837:2012 'Trees in relation to design, demolition and construction - recommendations'.
- 1.3. The scope of the instruction was to inspect trees at the site and provide written advice on how they inform feasibility and design options for the site.

2. SITE DESCRIPTION

- 2.1. The site is a small paddock demarcated by post and mesh fencing, located to the east of a residential area and is presently used for grazing horses. To the north-west corner of the site is a collection of stables and outbuildings.



Figure 1: aerial photo (Google Maps) showing the site in its local context.

- 2.2. The site is approximately 1.2 hectares in size and situated at the western edge of the hamlet of Tarmfield. The site boundaries to the north and south abut residential sites. There is agricultural land to the east and the site is parallel with the residential street of Dunsley Drive to the west.
- 2.3. The site is relatively flat throughout and access is via a field gate from Dunsley Drive at the north-west corner via a sloping ramp leading upwards from Dunsley Drive. The site itself is elevated above the level of Dunsley

Drive by approximately 4m, the boundary to the west has a sloping verge down to Dunsley Drive. There are overhead telecomm lines running along the western boundary.

3. TREE SURVEY FINDINGS

- 3.1. A total of 15 trees, 4 group features and 3 hedgerows were surveyed. These are summarised in terms of their quality in accordance with the recommendations of BS5837 below, and shown in more detail on the Tree Survey and Constraints Plan (**Section 2**) and within the Tree Survey Schedule (**Section 3**).

	Total	A - High quality trees whose retention is most desirable.	B - Moderate quality trees whose retention is desirable.	C - Low quality trees which could be retained but should not significantly constrain the proposal.	U - Very poor quality trees that should be removed unless they have high conservation value.
Trees	15	-	12	3	-
Groups	4	-	3	1	-
Hedgerows	3	-	1	2	-
Total	22	-	16	6	-

Table 1: Summary of arboricultural features of each BS5837 quality category

4. KEY ARBORICULTURAL FEATURES

- 4.1. There are no veteran or ancient trees located within the site nor Ancient Woodland associated to the site.
- 4.2. There is an area of woodland outside the survey area, located approximately 130m to the south of the site listed as broadleaved woodland on the '2014 National Forestry Inventory' and as deciduous woodland on the '2021 Priority Habitat Inventory' hosted by DEFRA.

5. CONSTRAINTS AND OPPORTUNITIES

- 5.1. Trees recorded as offsite (T1 - T5; T10 - T15; G3; G4 and H3) will have an influence on the developable area of the site. The Root Protection Areas (RPA) of these trees encroach into the site and these areas should be free from construction wherever possible.
- 5.2. It is feasible that the Leylandii T1 could be retained in the short to mid-term, however, in the long-term, the tree may require pruning; as the tree gains height this will cause shading across the site and there is an increased risk of limb failure. Post-development resentment of the tree would create a perceived need to prune T1 or eventually fell the tree. Conifers of this species are difficult to prune in a safe and sustainable manner.
- 5.3. The opportunities for new planting on a site such as this are plentiful. The boundaries would benefit from being demarcated with hedgerows to offer screening and resilience to strong winds. Where new planting is proposed, attention is drawn to allowing space for future growth of the tree(s).

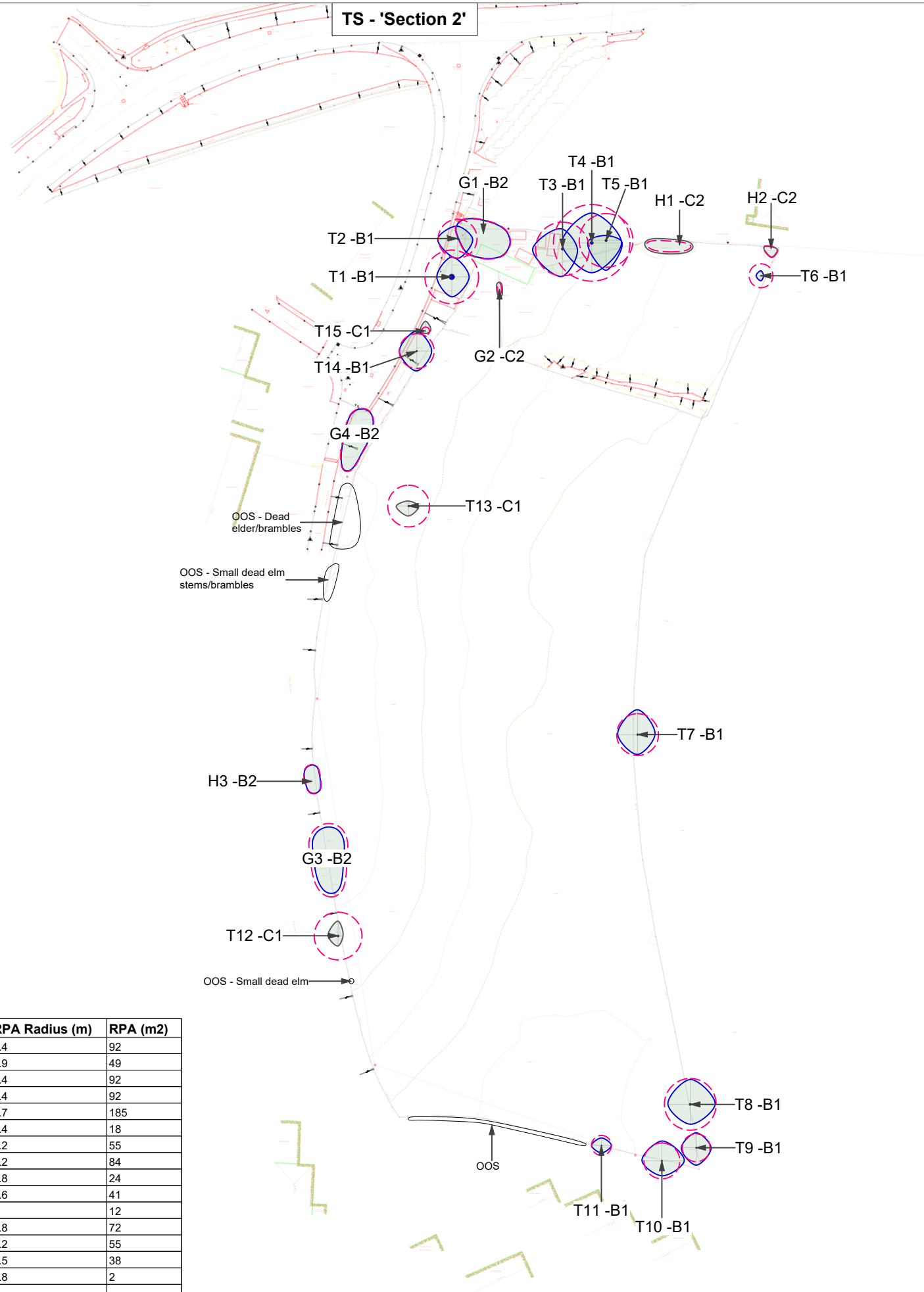
5.4. Please see **Section 5** for further advice and guidance on designing new developments near to trees.

6. RECOMMENDATIONS AND CONCLUSION

- 6.1. The information contained within this report should be used in the preparation of design proposals for the site, in order to minimise negative arboricultural impacts.
- 6.2. The potential provision of new tree planting could enhance the surrounding tree stock and help further improve the habitat value across the site.
- 6.3. Once the design proposal has been agreed, an Arboricultural Impacts Assessment report should be prepared for submission to the LPA in order for the planning application to be validated and to provide the LPA with sufficient information in order to determine the application.



David Holmes *FdSc, MArborA*, Arboriculturist



- KEY**
- Category A Tree - High quality (Retention highly desirable)
 - Category A - Hedgerow, Group, Woodland - High quality (Retention highly desirable)
 - Category B Tree - Moderate quality (Retention desirable)
 - Category B - Hedgerow, Group, Woodland - Moderate quality (Retention desirable)
 - Category C Tree - Low quality (May be retained but should not constrain development)
 - Category C - Hedgerow, Group, Woodland - Low quality (May be retained but should not constrain development)
 - Category U Tree - Very low quality (Mostly unsuitable for retention)
 - Category U - Hedgerow, Group, Woodland - Very low quality (Mostly unsuitable for retention)
 - Root Protection Area (RPA) - Layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and soil volume to maintain the tree's viability
 - Shrub mass/offsite tree/out of scope (OOS)

Note: The original of this drawing was produced in colour – a monochrome copy should not be relied upon. This drawing should be interpreted with reference to the accompanying tree schedule and written advice



Ref	Species	Height (m)	Life Stage	RPA Radius (m)	RPA (m2)
T1	Cypress (Leyland)	11	EM	5.4	92
T2	Birch (Silver)	10	EM	3.9	49
T3	Yew (Common)	7	SM	5.4	92
T5	Yew (Common)	6	SM	5.4	92
T4	Birch (Silver)	10	SM	7.7	185
T6	Holly	3	SM	2.4	18
T7	Hawthorn	5.5	M	4.2	55
T8	Hawthorn	6.5	M	5.2	84
T9	Hawthorn	4.5	EM	2.8	24
T10	Birch (Silver)	9	EM	3.6	41
T11	Birch (Silver)	6	EM	2	12
T12	Sycamore	6	EM	4.8	72
T13	Elder	5.5	EM	4.2	55
T14	Apple	5	EM	3.5	38
T15	Hawthorn	2.5	Y	0.8	2
G1	Holly; elder	6	EM	3	-
G2	Elder	2.5	SM	1	-
G3	Oak; birch; elm; goat willow	11	EM	5.2	-
G4	Holly	7	EM	3	-
H1	Laurel	2.5	Y	0.8	-
H2	Laurel	1	Y	0.6	-
H3	Hawthorn	5.5	M	1.5	-

PROJECT TITLE
Dunsley Drive, Kinver

DRAWING TITLE
Tree Survey & Constraints Plan

SCALE: **1:1000 @ A3** DRAWING NUMBER: **BHA_4927_01**

DRAWN BY: **DV** APPROVED BY: **DH** REVISION: **-** SHEET: **-** DATE: **24/02/2022**

LAYOUT USED WITHIN DRAWING: **xxxxxxxxxx**

CLIENT: **CSA Environmental**

COORDINATE SYSTEM / DATUM: **British National Grid / Newlyn Datum (AOD)**

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INDIVIDUAL TREES

Ref	Species	On/off site	Top Height (m)	No. of Stems	Est diam?	Calc. / Actual Stem Dia. (mm)	Crown radii (m) N-E-S-W	Avg. low crown height (m)	1st branch ht (m)	1st branch dir.	Life Stage	Special importance	General Observations	Health & vitality	Structural condition	Estimated Remaining Contribution (Years)	BS5837 Category	RPA Radius (m)	RPA m ²
T1	Cypress (Leyland)	Off	11.0	8	Yes	450	4-3-4-3	0.0	0.0	-	EM	None	Typical for species; telecoms overhead lines passing through crown	Good	Fair	20+	B1	5.4	92.0
T2	Birch (Silver)	Off	10.0	1	None	330	2-3-4-4	1.0	1.0	W	EM	None	Adjacent to telecoms pole with overhead lines passing through crown	Good	Fair	20+	B1	3.9	49.0
T3	Yew (Common)	Off	7.0	4	Yes	450	4-3-5-6	0.0	0.0	-	SM	None	Bonfire lit to east of tree causing minor damage to lower limbs	Good	Fair	20+	B1	5.4	92.0
T4	Birch (Silver)	Off	10.0	2	Yes	640	6-6-6-6	2.0	2.0	S	SM	None	Bonfire lit to west of tree causing minor damage to lower limbs; small branches removed to north for overhead power line clearance	Good	Fair	20+	B1	7.7	185.0
T5	Yew (Common)	Off	6.0	5	Yes	450	1-3-6-3	0.0	0.0	-	SM	None	Bonfire lit to west of tree causing minor damage to lower limbs; heavily reduced to north for overhead power line clearance	Good	Fair	20+	B1	5.4	92.0
T6	Holly	On	3.0	6	Yes	200	1-0-1-1	0.0	0.0	-	SM	None	Typical for species	Good	Fair	20+	B1	2.4	18.0
T7	Hawthorn	On	5.5	2	Yes	350	5-3-4-4	0.0	0.25	W	M	None	Remnant part of hedge; growing between 2 fences	Good	Fair	20+	B1	4.2	55.0
T8	Hawthorn	On	6.5	3	Yes	430	5-5-4-4	0.0	0.0	-	M	None	Remnant part of hedge; growing between 2 fences	Good	Fair	20+	B1	5.2	84.0
T9	Hawthorn	On	4.5	3	Yes	230	3-3-3-3	0.0	0.0	-	EM	None	Remnant part of hedge; growing between 2 fences	Good	Fair	20+	B1	2.8	24.0
T10	Birch (Silver)	Off	9.0	3	None	300.0	4-4-3-4	1.5	1.5	E	EM	None	Typical for species	Good	Fair	20+	B1	3.6	41.0
T11	Birch (Silver)	Off	6.0	2	None	160.0	1-2-1-2	1.0	1.0	E	EM	None	Typical for species	Good	Fair	20+	B1	2.0	12.0
T12	Sycamore	Off	6.0	20	None	400.0	3-1-2-2	0.0	0.0	-	EM	None	Prolific young re-gen from early-mature stump; telecoms overhead lines passing crown to east	Fair	Fair	10+	C1	4.8	72.0

Ref	Species	On/off site	Top Height (m)	No. of Stems	Est diam?	Calc. / Actual Stem Dia. (mm)	Crown radii (m) N-E-S-W	Avg. low crown height (m)	1st branch ht (m)	1st branch dir.	Life Stage	Special importance	General Observations	Health & vitality	Structural condition	Estimated Remaining Contribution (Years)	BS5837 Category	RPA Radius (m)	RPA m ²
T13	Elder	Off	5.5	10	None	350.0	1-2-2-2	0.0	0.0	-	EM	None	Decay to main stems with associated decay; mild dieback to upper crown; prolific basal shoots	Fair	Fair	10+	C1	4.2	55.0
T14	Apple	Off	5.0	2	Yes	290.0	4-3-4-3	0.0	0.0	NW	EM	None	Telecoms overhead lines passing above crown	Good	Fair	20+	B1	3.5	38.0
T15	Hawthorn	Off	2.5	2	None	70.0	2-1-0-1	0.0	0.0	-	Y	None	Self-seeded within verge	Good	Fair	10+	C1	0.8	2.0

GROUPS OF TREES

Ref	Species	On/off site	Height range (m)	No. of trees	Est diam?	Max stem diam (mm)	Av. Crown radius (m)	Avg. low crown height (m)	Life Stage	Special importance	General Observations	Health & vitality	Structural condition	Estimated Remaining Contribution (Years)	BS5837 Category	RPA Radius (m)
G1	Holly; elder	On	6	3	Yes	250.0	3.0	0.0	EM	None	Typical for species; 3x holly & 1x elder	Good	Fair	20+	B2	3.0
G2	Elder	On	2.5	2	None	80.0	1.25	0.0	SM	None	Typical for species; self-seeded growing through fence	Fair	Fair	10+	C2	1.0
G3	Oak; birch; elm; goat willow	Off	11	7	None	430.0	4.5	0.0	EM	None	1x oak; 1x goat willow; 2x birch; 3x elm; elm stems in decline, telecoms overhead lines passing through crowns, mild ivy cover to lower stems	Good	Fair	20+	B2	5.2
G4	Holly	Off	7	3	Yes	250.0	3.0	0.0	EM	None	Telecoms overhead lines passing through crowns	Good	Fair	20+	B2	3.0

HEDGES

Ref	Species	On/off site	Av. Height (m)	Av. width (m)	Av. Stem diam (mm)	Avg. low crown height (m)	Life Stage	General Observations	Health & vitality	Structural condition	Estimated Remaining Contribution (Years)	BS5837 Category	RPA Radius (m)
H1	Laurel	On	2.5	2.5	70	0.0	Y	Topped @ approx 2.5m; plot becoming colonised by brambles	Good	Fair	10+	C2	0.8
H2	Laurel	On	1.0	1	50	0.0	Y	Small maintained section	Good	Fair	10+	C2	0.6
H3	Hawthorn	Off	5.5	3	120	0.0	M	Remnant part of hedge; mild ivy cover to stems & scaffold limbs	Good	Fair	20+	B2	1.5



IMAGE 1: A view looking east at the entrance into the site, taken from Dunsley Drive.



IMAGE 2: A view looking north-east, taken from the site entrance looking at the offsite boundary features.



IMAGE 3: A general view of the site looking north, with the boundary trees labelled for reference.



IMAGE 4: a view looking north along the boundary fence, showing an older intermittent metal fence and newer post & mesh fencing.



IMAGE 5: A view looking north-west, at the boundary of the site with Dunsley Drive.



IMAGE 6: A view looking south-west, showing the boundary group G3 and the in-field self-seeded elder T13.

- The tree survey was carried out with reference to the methodology set out in BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations'.
- Trees were surveyed individually or as groups where it was considered that they had grown together to form cohesive arboricultural features either aerodynamically (trees that provide companion shelter), visually (e.g. avenues or screens) or culturally (including for biodiversity). However, where it was considered that there was an arboricultural need to differentiate between attributes trees within groups and / or woodlands were also surveyed as individuals.
- The full tree survey findings are recorded in the following tree survey schedule.
- Within the tree survey schedule, each surveyed TREE (T), GROUP (G), HEDGEROW (H), WOODLAND (W) or SHRUB MASS on or adjacent to the site is given a reference number which refers to its position on the tree survey and constraints plan.
- TREE SPECIES are listed by common name.

The **DIMENSIONS** taken are:

- STEM-No. Indicates the number of main stems (i.e. whether the trunk divides at or below 1.5m; (Used in the calculation of RPA.) "m-s" = Multi-stemmed.
- STEM DIAMETER (measured in millimetres), obtained from the girth measured at approx. 1.5m. For trees with 2 to 5 sub-stems a notional figure is derived from the sum of their cross-sectional areas. For multi-stemmed trees, the notional diameter may be estimated on the basis of the average stem size x the number of stems. (A notional diameter may be estimated where measurement is not possible.)
- HEIGHT (measured in metres), recorded to the nearest half metre for dimensions up to 10m and to the nearest whole metre for dimensions over 10m.
- The CROWN SPREAD, taken at the four cardinal points to derive an accurate representation of the tree crown, recorded up to the nearest half metre for dimensions up to 10m and to up the nearest whole metre for dimensions over 10m.
- CROWN CLEARANCES are expressed both as existing height above ground level of first significant branch along with its direction of growth (e.g. 2.5m-N), and also in terms of the overall crown e.g. the average height of the crown above ground level. Measurements are recorded to the nearest half metre for dimensions up to 10m and to the nearest whole metre for dimensions over 10m.
- ESTIMATES. Where any measurement has had to be estimated, due to inaccessibility for example, this is indicated by a "#" suffix to the measurement as shown in the tree survey schedule.

LIFE STAGE is defined as follows:

- Y Young: Normally stake dependent, establishing trees. Should be growing fast, usually primarily increasing in height more than spread but as yet making limited impact upon the landscape.
- SM Semi-mature: Established young trees, normally of good vigour and still increasing in height but beginning to spread laterally. Beginning to make an impact upon the local landscape and environment. Semi-Mature (still capable of being transplanted without preparation, up to 30cm girth and not yet sexually mature).

- EM Early-mature: Not yet having reached 75% of expected mature size. Established young trees, normally of good vigour and still increasing in height but beginning to spread laterally. Beginning to make an impact upon the local landscape and environment.
- M Mature: Well-established trees, still growing with some vigour but tending to fill out and increase spread. Bark may be beginning to crack and fissure. In the middle half of their safe, useful life expectancies.
- LM Late-Mature: In full maturity but possibly beyond mature and in a state of natural decline). Still retaining some vigour but any growth is slowing.
- A Ancient: A tree that has passed beyond maturity and is old/aged compared with other trees of the same species. Typically having a very wide trunk and a small canopy.

PHYSIOLOGICAL CONDITION (HEALTH & VITALITY):

Essentially a snapshot of the general health of the tree based upon its general appearance, it's apparent vigour and the presence or absence of symptoms associated with poor health, physiological stress etc. (Fungal infections may be recorded here but decay giving rise to structural weakness would be recorded under 'Structural Condition' – see next parameter):

Good: No significant health issues.

Fair: Indications of slight stress or minor disease (e.g. the presence of minor dieback/deadwood or of epicormic shoot growth).

Poor: Significant stress or disease noted; larger areas of dieback than above.

Dead: (or Moribund).

STRUCTURAL CONDITION:

Defects affecting the structural stability of the tree including decay, significant dead wood, root-plate instability or significant damage to structural roots, weak forks (e.g. those where bark is included between the members) etc.

Classified as:

Good: No obvious structural defects: basically sound.

Fair: Minor, potential or incipient defects.

Poor: Significant defect(s) likely to lead to actual failure in the medium to long-term.

Dead: (or Moribund).

ESTIMATED REMAINING CONTRIBUTION:

An estimate of the length of time in years that a tree might be expected to continue to make a useful contribution to the locality at an acceptable level of risk (based on an assumption of continued routine maintenance):

- Less than 10 years
- 10+ years
- 20+ years
- 40+ years

SPECIAL IMPORTANCE:

Trees that are particularly notable as high value trees such as ancient trees/woodland or veteran trees. Such trees may be regarded as the principal arboricultural features of a site and pose a significant constraint to potential development.

An *ancient* tree is one that has passed beyond maturity and is very old compared with other trees of the same species. Very few trees reach the ancient life-stage.

Veteran trees are often very old but not necessarily so; they may be regarded as ‘survivors’ that have developed some of the characteristic features of an ancient tree but have not necessarily lived as long. All ancient trees are veterans but not all veteran trees are ancient.

An ancient woodland is an area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland (ASNW), plantations on ancient woodland sites (PAWS) and ancient replanted woodland (ARW)

QUALITY CATEGORY:

Trees are classed as category U, A, B or C, based on criteria given in BS5837:2012; summary definitions as follows (see BS5837 for further details). Categories A, B and C are further characterised by the use of sub-categories, which attempt to identify what aspect of the tree is the main source of its perceived value, These are:

- (1) arboricultural qualities
- (2) landscape qualities, and
- (3) cultural, historic or ecological/conservation qualities.

Examples of these qualities for each of the three categories are given below, although these are indicative only.

Note: This is NOT a health and safety classification; the classification does not take into account any requirement for remedial tree care or ongoing maintenance apart from that which may affect the trees’ general suitability for retention.

CATEGORY A: HIGH QUALITY:

Trees or groups whose retention should be given a particularly high priority within the design process. Normally with an expected useful life expectancy of at least 40 years.

- A1: Notably fine specimens; rare or unusual specimens; essential component trees within groups, semi-formal or formal plantings (e.g. dominant trees within an avenue etc.).
- A2: Trees, groups or woodlands of particular visual importance as landscape features.
- A3: Trees, groups or woodlands of particular significance by virtue of their conservation, historical, commemorative or other value (e.g. veteran trees or wood pasture.)

CATEGORY B: MODERATE QUALITY:

Trees or groups of some importance with a likely useful life expectancy in excess of 20 years. Their retention would be desirable; selective removal of certain individuals may be acceptable but only after full consideration of all alternative courses of action.

- B1: Fair quality but not exceptional; good specimens showing some impairment (e.g. remediable defects, minor storm damage or poor past management.)
- B2: Acceptable trees situated such as to have little visual impact within the wider locality. Also numbers of trees, perhaps in groups or woodlands, whose value as landscape features is greater collectively than would warrant as individuals (such that the selective removal of an individual would not impact greatly upon the trees’ overall, collective value).
- B3: Trees, groups or woodlands with clearly identifiable conservation or other cultural benefits.

CATEGORY C: LOW QUALITY:

Trees or groups of rather low quality, although potentially capable of retention for at least approx. 10 years. Also small trees with stems below 15cm diameter.

Potentially retainable, but not of sufficient value to be regarded as a significant planning constraint.

- C1: Unremarkable trees of very limited merit or of significantly impaired condition.
- C2: Trees offering only low or short-term landscape benefits; also secondary specimens within groups or woodlands whose loss would not significantly diminish their landscape value.
- C3: Trees with extremely limited conservation or other cultural benefit.

CATEGORY U:

Trees likely to prove to be unsuitable for retention for longer than 10 years should any significant increase in site usage arise as a result of development.

E.g. dead or moribund trees; those at risk of collapse or in terminal decline; trees that will be left unstable by other essential works such as the removal of nearby category U trees; trees infected by pathogens that could materially affect other trees; low quality trees that are suppressing better specimens.

(Category U trees may have conservation values that it might be desirable to preserve. This category may also include trees that should be removed irrespective of any development proposals.)

ROOT PROTECTION AREA (RPA):

These are normally represented as a circle centred on the base of each tree stem with a radius of 12 times stem diameter, measured at 1.5m above ground level. The shape of the RPA may be altered where site conditions dictate that there are sound reasons to do so.

VETERAN OR ANCIENT TREE BUFFER (VTB/ATB)

In line with the Standing Advice produced by the Forestry Commission and Natural England this is a buffer zone (in metres) around an ancient or veteran tree that should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree’s canopy if that area is larger than 15 times the tree’s stem diameter.

ANCIENT WOODLAND BUFFER (FOR ASNW, PAWS OR ARW)

In line with the Standing Advice produced by the Forestry Commission and Natural England this is a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, a larger buffer zone may be required.

THE IMPORTANCE OF TREES

Wider benefits:

There is a growing body of evidence that trees bring a wide range of benefits to the places people live.

Some *Economic* benefits of trees include:

- Trees can increase property values
- As trees grow larger, the lift they give to property values grows proportionately
- They can improve the environmental performance of buildings by reducing heating and cooling costs, thereby cutting bills
- Mature landscapes with trees can be worth more as development sites
- Trees create a positive perception of a place for potential property buyers
- Urban trees improve the health of local populations, reducing healthcare costs

Some *Social* benefits of trees include:

- Trees help create a sense of place and local identity
- They benefit communities by increasing pride in the local area
- They can create focal points and landmarks
- They have a positive impact on people's physical and mental health
- They can have a positive impact on crime reduction

Some *Environmental* benefits of trees include:

- Urban trees reduce the 'urban heat island effect' of localised temperature extremes
- They provide shade, making streets and buildings cooler in summer
- They help remove dust and particulates from the air
- They help to reduce traffic noise by absorbing and deflecting sound
- They help to reduce wind speeds
- By providing food and shelter for wildlife, they help increase biodiversity
- They can reduce the effects of flash flooding by slowing the rate at which rainfall reaches the ground
- They can help remediate contaminated soil

On new development sites:

Trees bring many benefits to new development. Where retained successfully they can form important and sustainable elements of green infrastructure, contribute to urban cooling and reduce energy demands in buildings. Their importance is acknowledged in relation to adaptation to the effects of climate change. Other benefits brought by trees include:

- Increasing property values
- Visual amenity
- Softening, complementing and adding maturity to built form
- Displaying seasonal change
- Increasing wildlife opportunities in built-up areas
- Contributing to screening and shade
- Reducing wind speed and turbulence

NATIONAL PLANNING POLICY

The National Planning Policy Framework 2021 (NPPF paragraph 180) states that, when determining planning applications, local planning authorities should apply the following principle:

c) 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.'

In this respect the following definitions apply:

'Ancient woodland: An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)', and

'Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.'

Note: Further information from the National Planning Policy Guidance Suite and Standing Advice is provided in the design guidance section.

Other paragraphs of the NPPF 2021 of relevance to this report are:

Paragraph 131: *'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'*

Paragraph 174: *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'

STATUTORY CONTROLS

Statutory tree protection

Works to trees which are covered by Tree Preservation Orders (TPOs) or are within a Conservation Area (CA) require permission or consent from the Local Planning Authority. Where information is available on any Statutory designations such as this they are identified within the summary table in Section 1 and on the Tree Survey and Constraints Plan at Section 2.

Notwithstanding specific exceptions and in general terms, a TPO prevents the cutting down, uprooting, topping, lopping, wilful damage or wilful destruction of protected trees or woodlands without the prior written consent of the LPA.

Penalties for contravention of a TPO tend to reflect the extent of damage caused but can, in the event of a tree being destroyed, result in a fine of up to £20,000 if convicted in a Magistrates' Court, or an unlimited fine if the matter is determined by the Crown Court.

Similarly, and again notwithstanding specific exceptions, it is an offence to carry out any works to a tree in a Conservation Area with a trunk diameter greater than 75mm diameter at 1.5 height without having first provided the LPA with 6 weeks written notification of intent to carry out the works.

On many non-residential sites (excluding specific exemptions) there is also a statutory restriction relating to tree felling that relates to quantities of timber that can be removed within set time periods. In basic

terms, it is an offence to remove more than 5 cubic metres of timber in any one calendar quarter without having first obtained a felling licence from the Forestry Commission.

Any proposed tree works that are planned to be carried out on site must be carried out in accordance with the statutory controls outlined.

Statutory Wildlife Protection

Although preliminary visual checks from ground level of likely wildlife habitats are made at the time of surveying, detailed ecological assessments of wildlife habitats are not made by the arboriculturist and fall outside of the scope for this report.

Trees which contain holes, splits, cracks and cavities could potentially provide a habitat for protected species such as bats in addition to birds and small mammals. It is advised that in some instances specialist ecological advice may be required. This may result in tree works being carried out following a detailed climbing inspection to the tree to ensure that protected species or their nests/roosts are not disturbed. If any are found, the site manager, site owner or consulting arboriculturist should be informed and appropriate action taken as recommended by the appointed Ecologist or the relevant Statutory Nature Conservation Organisation (SNCO): Natural England, Scottish Natural Heritage or Natural Resources Wales.

It is advised that tree/hedgerow works are carried out with the understanding that birds will generally nest in trees, hedges and shrubs between March and August. This time period only provides an indication of likely nesting times and as such diligence is required when undertaking tree works at all times.

Irrespective of the time of year and other than any actions approved under General Licence, it is an offence to intentionally kill, injure or take any wild bird or to intentionally take, damage or destroy the nest or eggs of any wild bird. Ideally, tree operations should be avoided during the likely bird nesting period. However, any tree works should always only be carried out following a preliminary visual check of the vegetation.

For information, the Wildlife and Countryside Act 1981 (as amended), The Countryside and Rights of Way Act 2000 (as amended) and the Conservation of Habitat and Species Regulations 2010, form the basis of the statutory legislation for flora and fauna in England and Wales. A different legislative framework applies in Scotland and Northern Ireland.

Any proposed tree works that are planned to be carried out on site must be carried out in accordance with any relevant statutory controls, outlined above.

DESIGN GUIDANCE

Approach

The approach adopts the guidelines set out in the British Standard BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. The process is broken down to coordinate with the key elements within both the RIBA Plan of Work (2013) and British Standard 5837:2012 as set out in the table below:

Information Stage	RIBA Stage	BS5837:2012
Stage A – Tree Survey	2: Concept	4: Feasibility
Stage B – Arboricultural Impact Assessment	3: Developed design	5: Proposals
Stage C – Arboricultural Method Statement	4: Technical design	6: Technical Design
Stage D – Arboricultural Site Supervision	5: Construction	7: Demolition and construction

A hierarchical approach is adopted in order to achieve optimum use of the site and location of built structures. This is set out below:

Avoid

The starting point of Site layout design should be to avoid the RPA of retained trees and provide suitable clearance from above ground constraints [tree canopies]. Where possible building lines should be at least 2m outside the RPA to provide working space for construction. However, protection measures can be taken if such clearance is not achievable.

Mitigate

Where intrusion within the RPA is unavoidable then its impact on the tree can be mitigated by specialist measures:

Foundations that avoid trenching e.g. screw piles, suspended floor slabs or casting at ground level for lightweight structures such as bin and cycle stores.

Limited use may be made for parking, drives or hard surfaces within the root protection areas, subject to advice from a qualified arboriculturist. Cellular confinement systems that enable hard surfaces to be built above existing soil levels are acceptable methods subject to site-specific soil conditions.

Service runs that cannot be routed outside the RPA(s) can be installed by, for example, thrust boring, directional drilling, air excavation or hand digging. These operations often require supervision by the project arboriculturist.

Compensate

Replacement planting can ensure the continuity of tree cover where tree removal is unavoidable or desirable. Off-site provision may be considered in some circumstances but this will require negotiation with the local planning authority.

Considerations:

For proposed residential developments, consideration must be given to numerous factors future tree growth and orientation.

Tree constraints

Root Protection Areas:

With reference to BS5837:2012, a root protection area (RPA) is defined as “a layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree’s viability, and where the protection of the roots and soil structure should be treated as a priority”. **“The default position [when considering design layout in relation to RPAs] should be that structures are located outside the RPAs of trees to be retained”.**

BS5837:2012 states (4.6.2) that, “where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced.” The BS goes on to state that, “modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution,” and that any deviation from the original circular plot should take into account:

- Morphology and disposition of roots;
- topography and drainage;
- soil type and structure;
- the likely tolerance of the tree to root damage/disturbance.

Additional buffer zones beyond the RPA:

The following text is taken from the Standing Advice produced by the Forestry Commission and Natural England as included in the National Planning Policy Guidance:

'A buffer zone's purpose is to protect ancient woodland and individual ancient or veteran trees. The size and type of buffer zone should vary depending on the scale, type and impact of the development'.

Ancient woodland buffer:

'For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic'.

Ancient and veteran tree buffer:

'A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter'.

Above ground:

Above ground constraints posed by trees describe the capacity for trees to have an overbearing or dominating effect on new developments; usually post occupancy. Typical above ground constraints include a number or combination of inconveniences including shading, branch spread, movement of trees during strong winds and so on. If not adequately considered, above ground constraints can lead to repeated requests to fell or heavily prune retained and protected trees.

Shade:

Adverse shading and blocked views from windows raise concerns for incoming residents, which may lead to pressure to fell or remove trees in the future. Wherever possible it is advisable to arrange fenestration away from tree canopies to lessen the conflict, or increase window size to accommodate ambient light. Conversely, appropriate designed development can use existing or new trees to create necessary and welcome shade and screening.

As part of the adopted approach the above considerations and constraints are assessed cumulatively in order to provide clear and site-specific advice on the areas of a site most suitable for the location of development.

Dependent on the site and nature of the proposed development, the Tree Survey and Constraints Plans may show the following:

Recommended Developable area - an advisory area defined in order to minimise arboricultural impacts using standard approaches to construction. Restricting proposed development to this area will limit the risk of harm to retained trees and of the Local Planning Authority objecting to the proposed development. It may be possible to propose development outside of this area but specific 'low impact' construction techniques may be needed recommended.










Recommended Buffer to development - similar to the Recommended Developable Area but defined as a line marking a suitable buffer to retained trees. More commonly used on large sites or sites where the presence of trees is localised.

Tree Opportunities

Depending on the scale of developments existing trees can often provide opportunities to enhance the existing arboricultural resource of a site by bringing it into good management or by putting in place remedial measures e.g. soil amelioration.

Appropriately designed new tree planting is extremely important in maintaining healthy and sustainable tree populations. For the reasons highlighted, new trees can bring many benefits to new developments. It is critical to the establishment of new tree planting that the locations, species and specification of new trees is appropriate. Subsequently the sourcing of high-quality stock, suitable planting and the provision of post planting maintenance are essential to allow new trees to establish and to allow them to mature.

Appendix 10: Turley Constraints Plan

-  Site boundary
-  Approximate alignment of Public Right of Way
-  Highway Boundary
-  Topography (MAOD)
-  Vehicle Access
-  Existing Tree
-  Existing Hedgerow
-  Dense Scrub
-  Existing Building



CLIENT: Bellway Homes

PROJECT: Dunsley Drive, Kinver

DRAWING: Constraints Plan

PROJECT NUMBER: BELQ3007

DRAWING NUMBER: 10_03 CHECKED BY: NW

REVISION: 01 STATUS: Final

DATE: March 2022 SCALE: 1:500 @ A1

Appendix 11: Turley Illustrative Masterplan



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KEY

 Site boundary

AREAS

Site Area: 1.17 Ha (2.89 Acres)
Developable Area: 0.97 Ha (2.40 Acres)
Public Open Space: 0.20 Ha (0.49 Acres)

CLIENT:

Bellway Homes

PROJECT:

Dunsley Drive, Kinver

DRAWING:

Development Framework

PROJECT NUMBER:

BELQ3007

DRAWING NUMBER:

10_06

CHECKED BY:

NW

REVISION:

01

STATUS:

Final

DATE:

April 2022

SCALE:

1:500 @ A3

Turley Office
9 Colmore Row
Birmingham
B3 2BJ

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Appendix 2: Land off Hyde Lane, Kinver – Site Location Plan



In

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 Application boundary

CLIENT Bellway Homes
PROJECT Hyde Lane, Kinver
DRAWING: Site Location Plan

PROJECT NO. BELQ3007	STATUS Final
DRAWING NO. 10_1	SCALE 1:2,500 @ A3
REVISION 00	DATE May 2024
	CHECKED BY TJ

Turley

Appendix 3: Land off Hyde Lane, Kinver – Vision Document

Hyde Lane, Kinver

Vision Document

Prepared on behalf of Bellway Homes Ltd.

May 2024

On behalf of
Bellway

Prepared by
Turley

Introduction

This Vision Framework document has been prepared on behalf of the Bellway Homes Ltd (Bellway) in response to the growing housing requirements of Kinver and the wider area. It also supports the need for South Staffordshire Council to plan strategically for sustainable housing growth to help meet the needs of future generations.

It seeks to demonstrate that land at Hyde Lane, Kinver is a suitable, sustainable and deliverable site for future development and is the most logical location for future housing.

This document presents three separate options for development at the site and is intended to be flexible, so it can respond to the requirements of the emerging South Staffordshire Local Plan Review. All three options represent landscape-led proposals which reflect the site's characteristics and the surrounding context.



The site

The site is located on the northern edge of Kinver, South Staffordshire. Defined by Hyde Lane to the east, an existing hedgerow to the north, and residential properties bounding Cedar Gardens, Hillboro Rise and Hyde Close to the south and west, the site comprises of 8.5 Ha of land currently used for agricultural purposes.

Beyond the sites immediate boundaries, the village of Kinver extends outwards both south and west of the site with open farmland extending outwards to the north and east.

The site is well defined and contained by its existing boundaries and is not known to contain and inhibitive constraints which would limit its future development potential.



Site
aerial
photograph

Bellway

At Bellway our aim is not just to build new houses, it is to create attractive and sustainable communities that leave a positive legacy for residents and the wider society. Our commitment to this is demonstrated by being awarded the coveted five star housebuilder award by the House Builders Federation as a result of emphasis on build quality, customer care and health and safety.

Bellway recognise that successful developments must meet the needs of not just potential residents, but also of existing neighbouring communities. We therefore consult on new developments through tailored engagement with local communities and stakeholders, incorporating feedback into our plans to ensure local people have the opportunity to help shape developments within their community.

As the fourth largest housebuilder in the UK, Bellway are well placed to deliver much needed market and affordable homes to address the country's ongoing housing shortage. Since our beginning as a family business over 70 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables our divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are well-suited to the local area.

Bellway are promoting this highly sustainable Site in Kinver for the delivery of much needed market and affordable homes, and we are fully committed to working with the Council and the community to make this happen.



The team

This document has been prepared in collaboration with an experienced range of specialist consultants to ensure the proposals represent the highest quality development that is most suitable for the site and its surrounding context.

The consultant team instructed to advise as part of this project is as follows:

Turley

Turley

Planning and urban design



PHIL JONES ASSOCIATES
Highway planning consultants

Phil Jones Associates

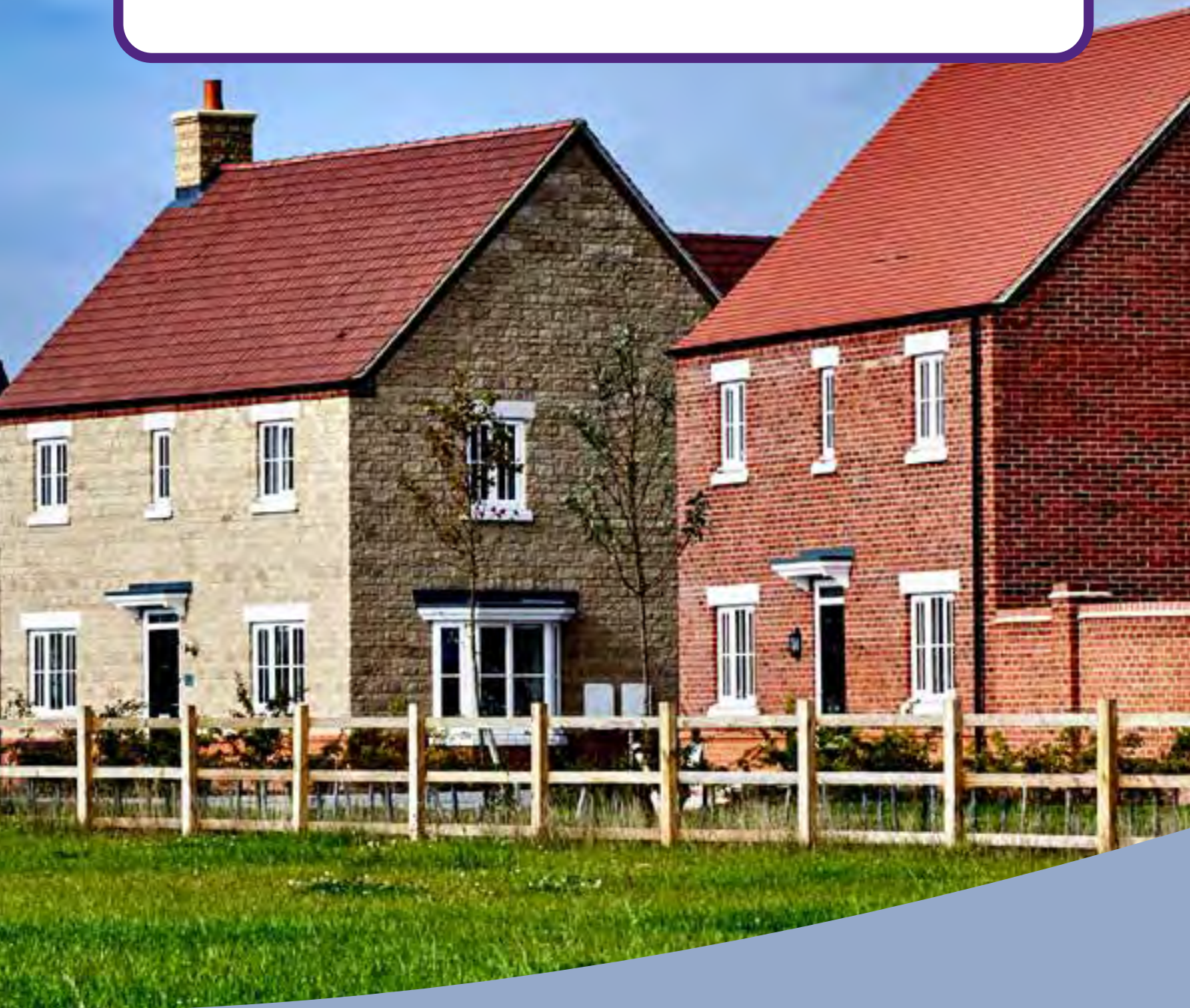
Highways and drainage



edp the environmental
dimension partnership

edp

Heritage and landscape

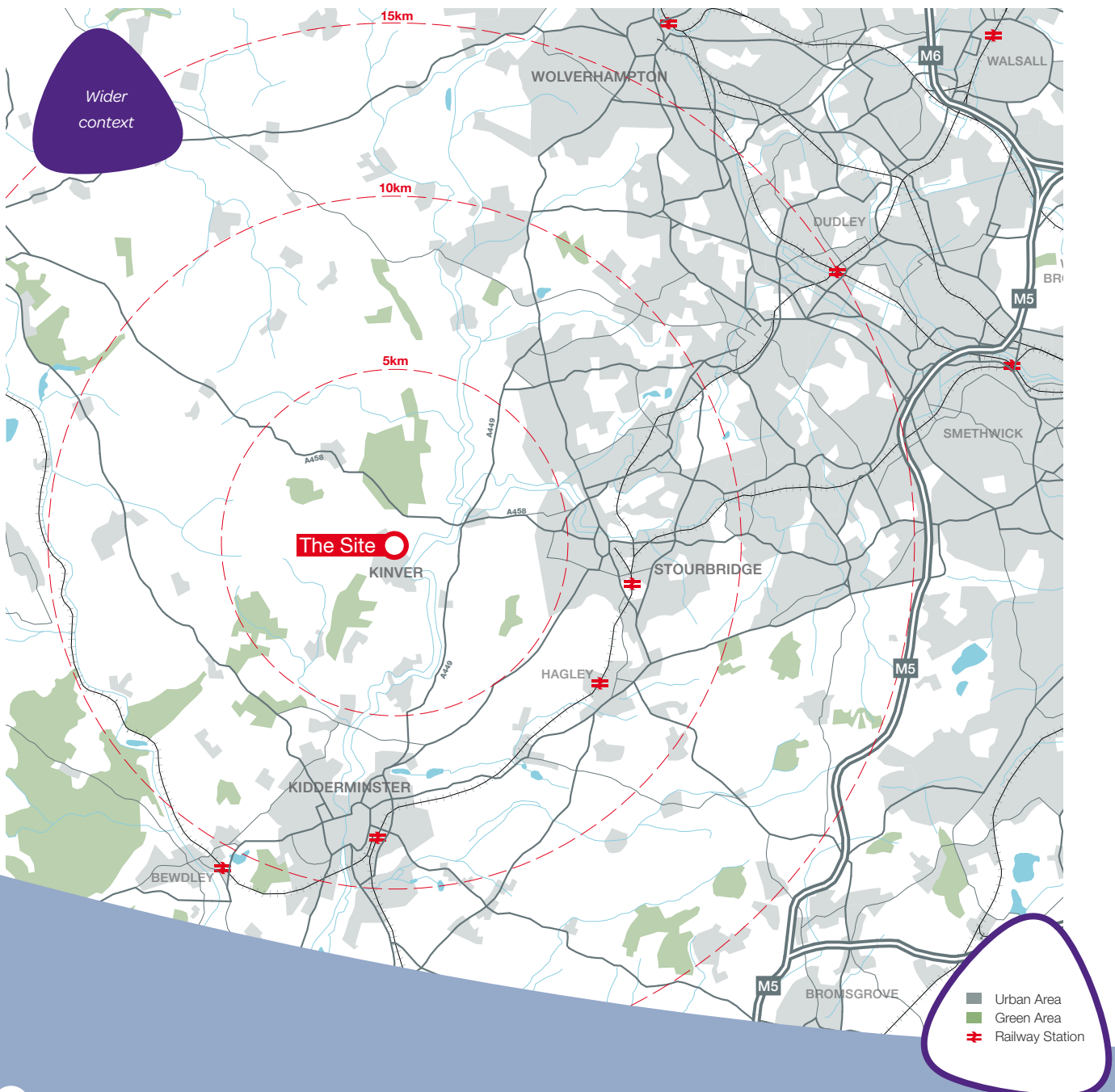


Strategic context

Kinver is a key service village of nearly 7,500 residents located to the west of Stourbridge. A historic rural settlement, the village is popular with commuters and families alike and hosts a range of service such as schools, doctors and a vibrant high street.

Located along the A449, Kinver has good connections with Stourbridge to the east and Kidderminster to the south. The local road network links the site to the M5, approximately 20 km to the east (a 30 minutes drive) and provides good connections to surrounding urban centres such as Birmingham, Wolverhampton and with wider Greater Birmingham and Black Country areas.

With regard to public transport, a number of bus services provide regular connections to the surrounding settlements of Stourbridge, Hagley, Kidderminster and Wolverhampton. These settlements also include a number of train stations providing regional, as well as national connections, with Stourbridge Town and Stourbridge Junction stations being the nearest, located approximately 9 km to the east (16 minute car drive) from Kinver. These stations provide direct and regular rail services to Birmingham, Kidderminster, Solihull and London.



Immediate context

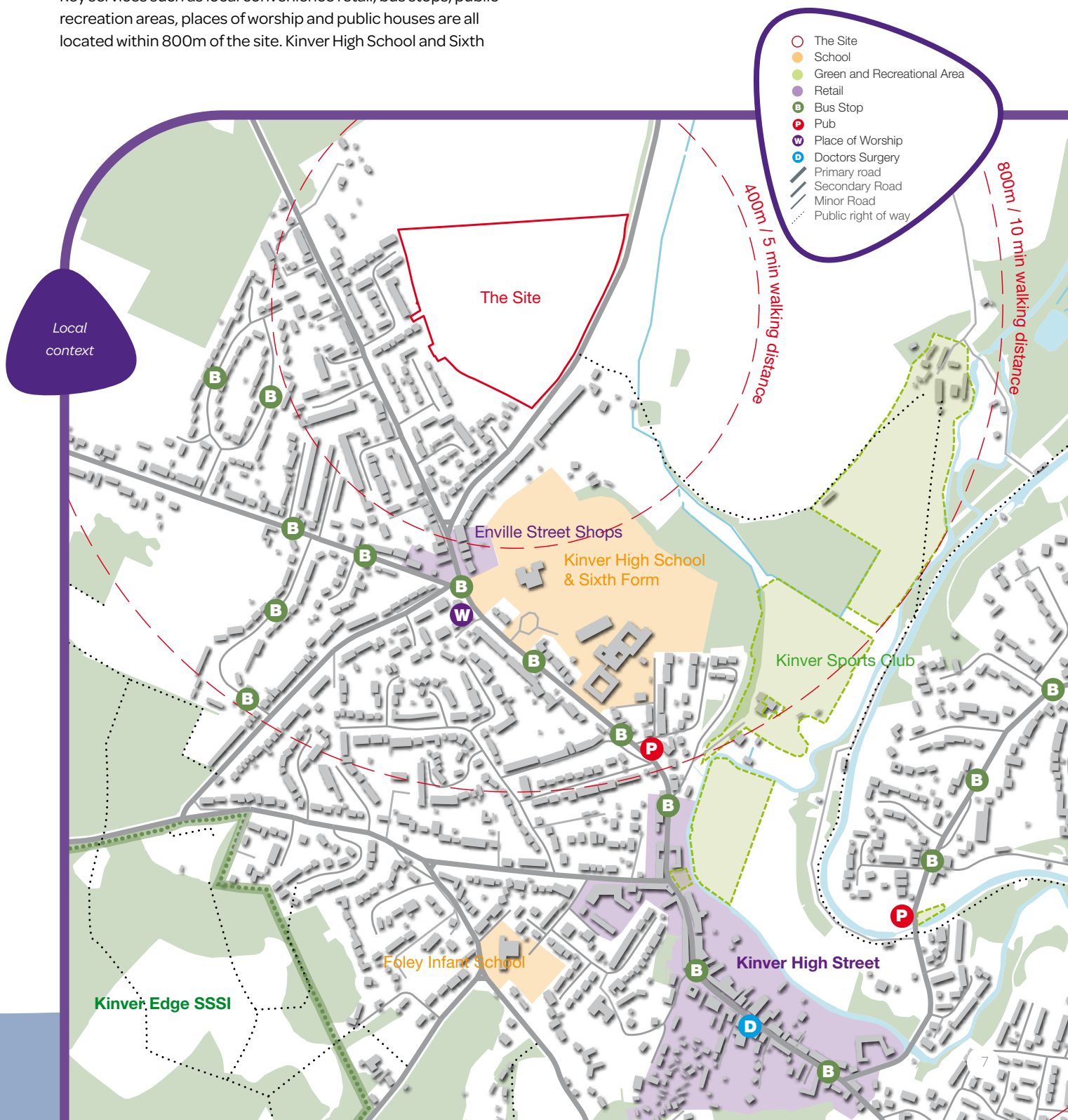
The site is located along the northern edge of Kinver adjacent to a number of residential streets.

Kinver has been identified within local planning policy as a Main Service Village which serves the needs of the wider area and hosts a range of high quality services which are key to supporting future residential growth.

Key services such as local convenience retail, bus stops, public recreation areas, places of worship and public houses are all located within 800m of the site. Kinver High School and Sixth

Form, the main secondary school which serves both Kinver and the surrounding area is also located less than 800m from the site.

Beyond but still within a short walk of the site is Foyle Infant School as well as Kinver High Street which plays host to a range of key local services including a doctors surgery, pharmacy and dentist, a library community hall as well as a number of leisure uses.



Strategic choice for housing

The Council has commenced preparation of its Local Plan Review and the associated evidence base. The Housing Site Selection Topic Paper (2021) established that the site at Hyde Lane performed well, being “free from significant constraints” and of “lesser Green Belt harm than other sites”. In addition, the Strategic Housing and Employment Land Availability Assessment (SHELAA) (2022) identified the site as potentially suitable.

Subsequently, the site formed a proposed allocation for 44 dwellings (Housing Allocation 576) in the Publication Plan 2022. This notwithstanding, this Vision Document presents several options for the site, which establish that it is capable of accommodating a greater scale of growth.

The updated 2024 Publication Plan revises the strategy for growth, specifically reducing the proportion of Green Belt release and contributions the plan makes to the Greater Birmingham and Black Country unmet housing needs. The site at Hyde Lane has consequently been omitted from the Plan. This notwithstanding, the site has previously been considered deliverable and a sustainable location for growth in Kinver by earlier iterations of the Plan.

Planning constraints

The site represents the most sustainable location for growth at Kinver. It is located wholly within Flood Zone 1, representing a low risk of flooding (less than 0.1%/1 in 1,000 years). There are no heritage assets located within or adjacent to the site. The Kinver Camp scheduled monument is 1.1km to the south and the edge of the Kinver Conservation Area is 550m to the south of the site at its nearest point. Furthermore, the site is not constrained by any environmental designations, such as Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas or Ramsar sites.

It will be accessed from Hyde Lane, a principal 6m wide single carriageway, which connects Kinver with the A458 (Bridgnorth Road) towards Stourbridge and Kidderminster via the A449. There is an opportunity to extend the existing footway to provide pedestrian access to the site.

Beyond land to the west of Hyde Lane, there are limited opportunities for growth around Kinver. The southern and western edges of the village are significantly constrained by the Canal Conservation Areas and Kinver Camp scheduled monument. Land to the east and south east is dominated by Kinver Edge (which contains the Kinver Hillfort) and forms part of the Merican Forest. Land to the north west is constrained by accessibility, given White Lane comprises a narrow carriageway 4.5m in width and the unconventional layout of the junction between White Hill, Meddins Lane and Enville Road which is prone to on street parking.

There are also large areas to the south east of Kinver which are within Flood Zones 2 and 3 and so unsuitable for residential development.

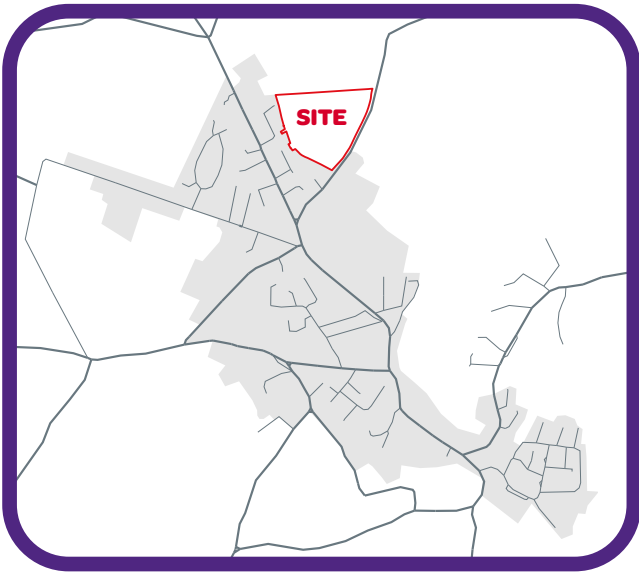
The plan below demonstrates the nature of Kinver and that land to the west of Hyde Lane represents the most sustainable location for housing growth.

Ideal for future development

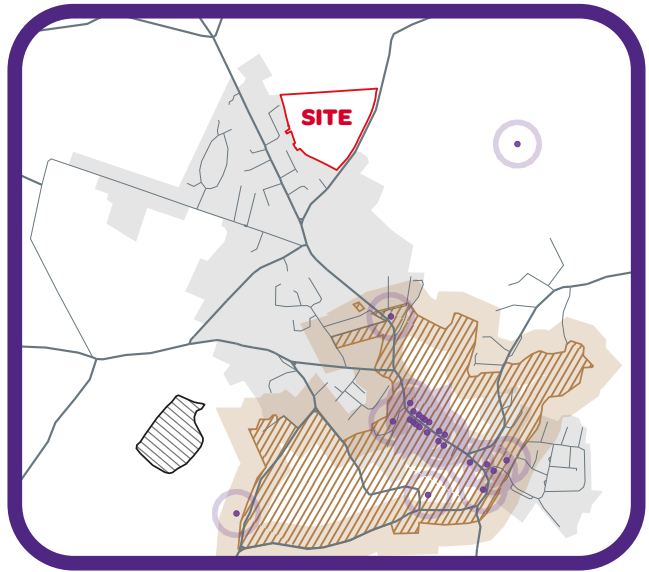
The constraints plans opposite clearly demonstrate how the site is ideally located for future housing growth:

- away from any heritage constraints including listed buildings and conservation areas
- away from any landscape constraints including the Kinver Edge SSSI
- outside any areas identified at risk of flooding or allocated flood plain, and
- along a route (Hyde Lane) which is capable of handling additional traffic needs.

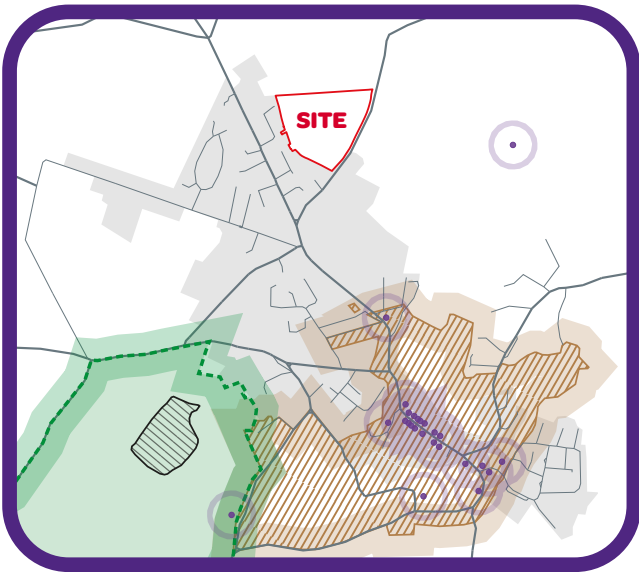
The site



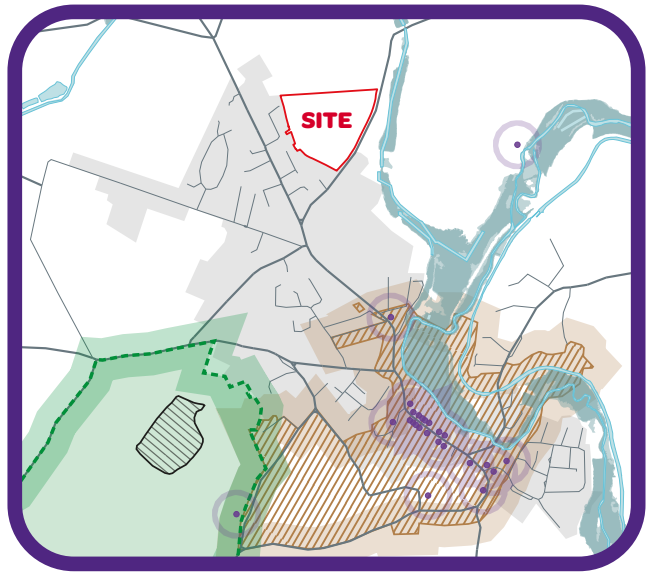
- away from heritage constraints



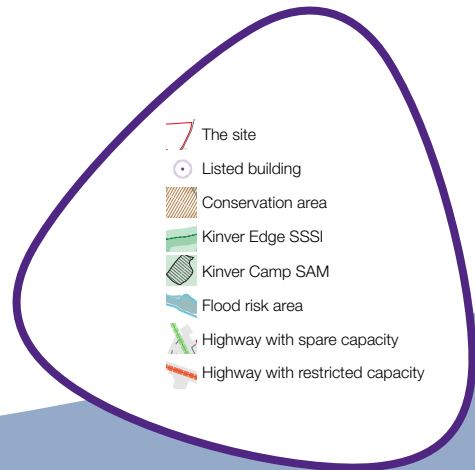
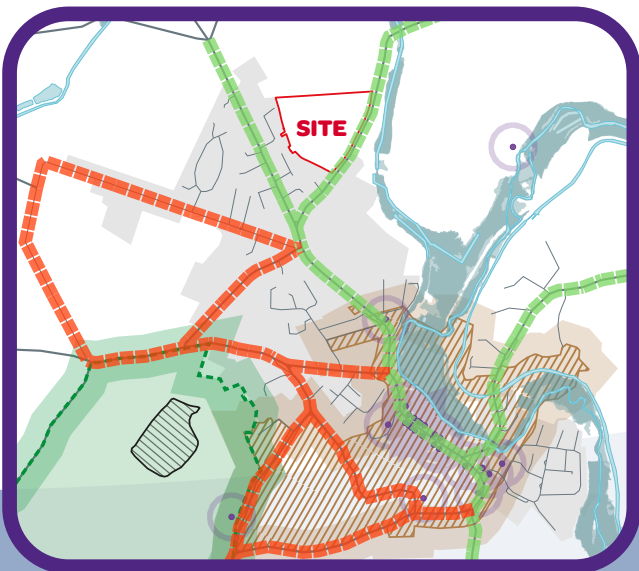
- away from landscape constraints



- away from flood risk areas



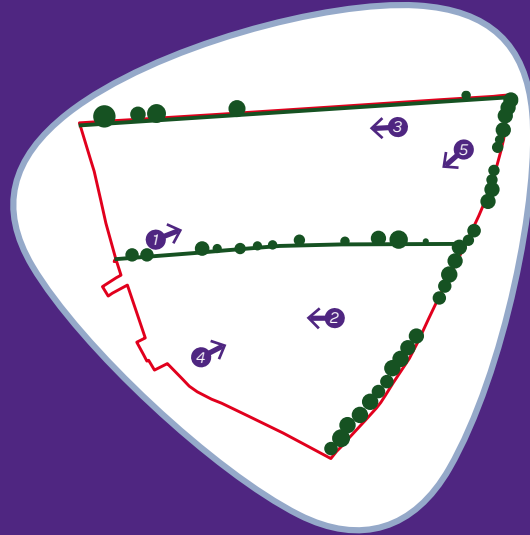
- with suitable highway capacity



Site context

The images below and on the adjacent page offer an insight into the site characters and setting as well as an understanding of the sites wide context.

Whilst currently used as farmland, the site is bound along its western and southern edges by the existing urban footprint of Kinver and represents an ideal opportunity to provide much needed housing land in a sensitive manner with minimal impacts on its setting.





Access and movement

Sustainable Travel Opportunities

The nearest bus stops to the site are located on Enville Road 400m south of the site and are accessible using existing pedestrian infrastructure.

From the southern extent of the site, there are footways along both sides of Hyde Lane with a minimum width of 1.5m. The majority of the footway is segregated from the carriageway with a grass verge. The footway continues along Enville Road towards the amenities within Kinver. Street lighting is provided on Hyde Lane and throughout Kinver. A zebra crossing is provided on Enville Road in the vicinity of the school, church and bus stops.

Accessibility

The site is well located in relation to all the basic amenities and services on offer in Kinver village. Schools covering all age groups, a dentist, convenience store and post office are all located within an acceptable walking distance of the site.

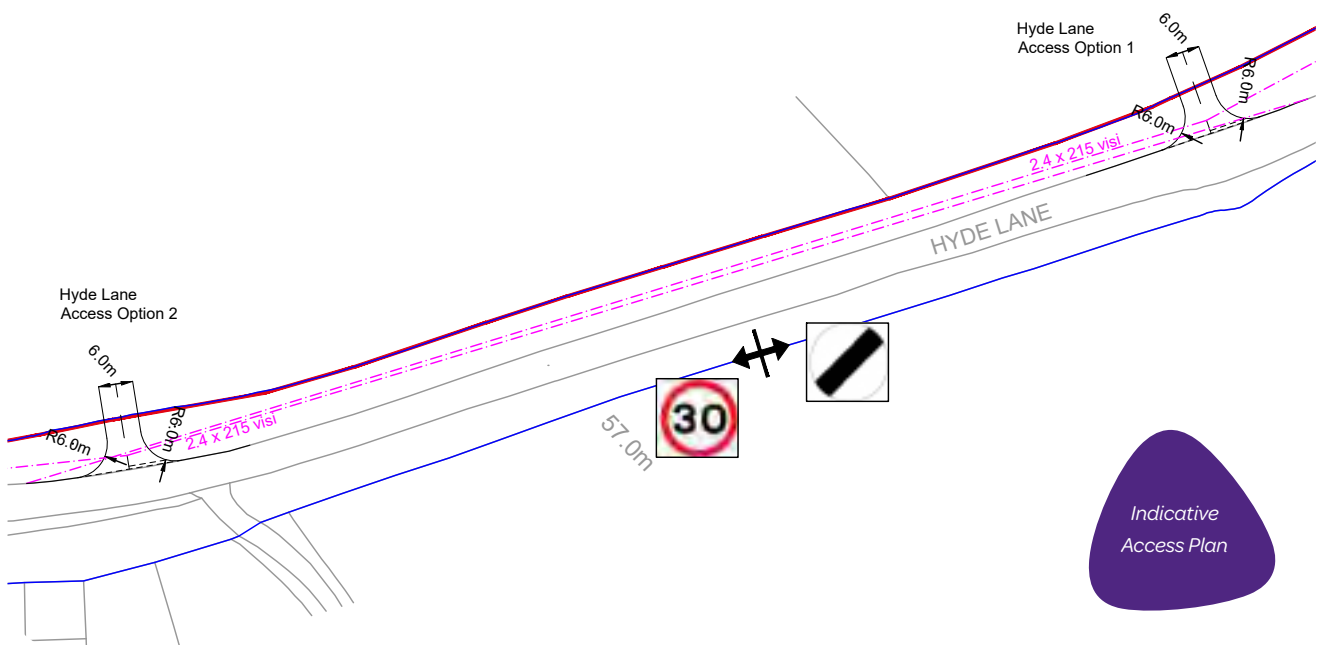
Vehicle Access Strategy

The site benefits from 370m of direct frontage with Hyde Lane, and this provides numerous opportunities to provide vehicular access to the site. The site has capacity for around 200 dwellings and this will require one, or two access points depending on the final number of dwellings that come forward.

Two potential access positions are shown on the plan below with the locations chosen identified as being optimal to reduce earthworks and the removal of vegetation:

- At the existing agricultural access to the northern field; and
- Opposite the existing dwellings on Hyde Lane.

The access points have been designed in accordance with DMRB and are deliverable within land under the control of Bellway. The access strategy has also been developed in consideration of the new access that will be provided to the housing allocation to the east of Hyde Lane. Both site of the site access points would be at least 100m from the access to housing allocation, and this is more than adequate in terms of junction spacing.



Pedestrian Access Strategy

The existing provision for pedestrians along Hyde Lane is of a good standard and this will be extended to the boundary of the site, all infrastructure can be provided within the site boundary or highway land.

There is an opportunity to provide an additional pedestrian and cycle access onto Cedar Gardens to provide increased connectivity particularly for the north western extent of the site. This infrastructure can also be provided within land under the control of Bellway and within highway land.

Summary

- There is a network of pedestrian routes providing direct access to local amenities within Kinver.
- The site is located within 400m of a bus stop which is served by all bus services within Kinver including regular bus services are provided between Kinver and Stourbridge and less frequent services to Kidderminster;
- The site is well located in relation to its accessibility of all the basic amenities within Kinver village. Schools, a dentist, convenience store and post office are all located within an acceptable walking distance of the site and a doctor's surgery is available within the preferred maximum walking distance.
- Given the existing transport infrastructure and proximity to local amenities, the site is well located for journeys to be undertaken by modes other than private car.
- Preliminary access designs for two options have been prepared which demonstrate that access can be provided which accords with the relevant design standards and there is flexibility in the access location.



Landscape

The site lies to the immediate west of Hyde Lane, on the north side of the village and has a predominantly easterly aspect with the north-western corner lying at around 76m AOD and the north eastern corner at around 56m AOD. The southern tip of the site lies at circa 60m AOD.

The site is bounded to the east by Hyde Lane which is defined by a slight bank with trees and outgrown hedgerow, to the west by rear boundaries of neighbouring properties located off Cedar Gardens and Hillboro Rise, to the north by an earth embankment topped with a poor quality, gappy hedgerow and to the south by the rear/side boundaries of residential properties off Hyde Lane.

The site itself comprises two field parcels separated by a dilapidated hedgerow with a sparse line of deciduous Larch trees. The most notable feature of the fields is their topography with the broadly easterly aspect complicated by more localised undulations aligned in an east-west alignment causing a 'ripple' effect moving southwards through the site.

Overall, the site does not demonstrate any landscape features worthy of absolute protection and retention other than the trees/hedges at its boundaries, many of which would benefit from improved management.

Please refer to Appendix 1 of the Vision Document for the Site Landscape Position Paper.



Kinver

Enville Lane

Visual amenity

The site's location to the northern side of the village, adjacent to well established modern development (latter half of the 20th Century) to the west means that it has the potential to integrate well with the existing settlement when seen in wider views.

Holy Austin Rock (St Peter's Church) is located to the south of the site, occupying the area with the greatest degree of elevation above the village (164m AOD). It provides expansive panoramic views over the village and the landscape beyond. Within views towards the site from this location the site appears well integrated with the existing settlement, appearing as a natural 'rounding off' of the northern edge.

Overall, the site's easterly aspect and the topography of the local landscape results in a relatively limited visual envelope which integrates the site with the existing village form. This means that the site is perceived as a logical extension of the village rather than an incoherent, disconnected addition.



Heritage

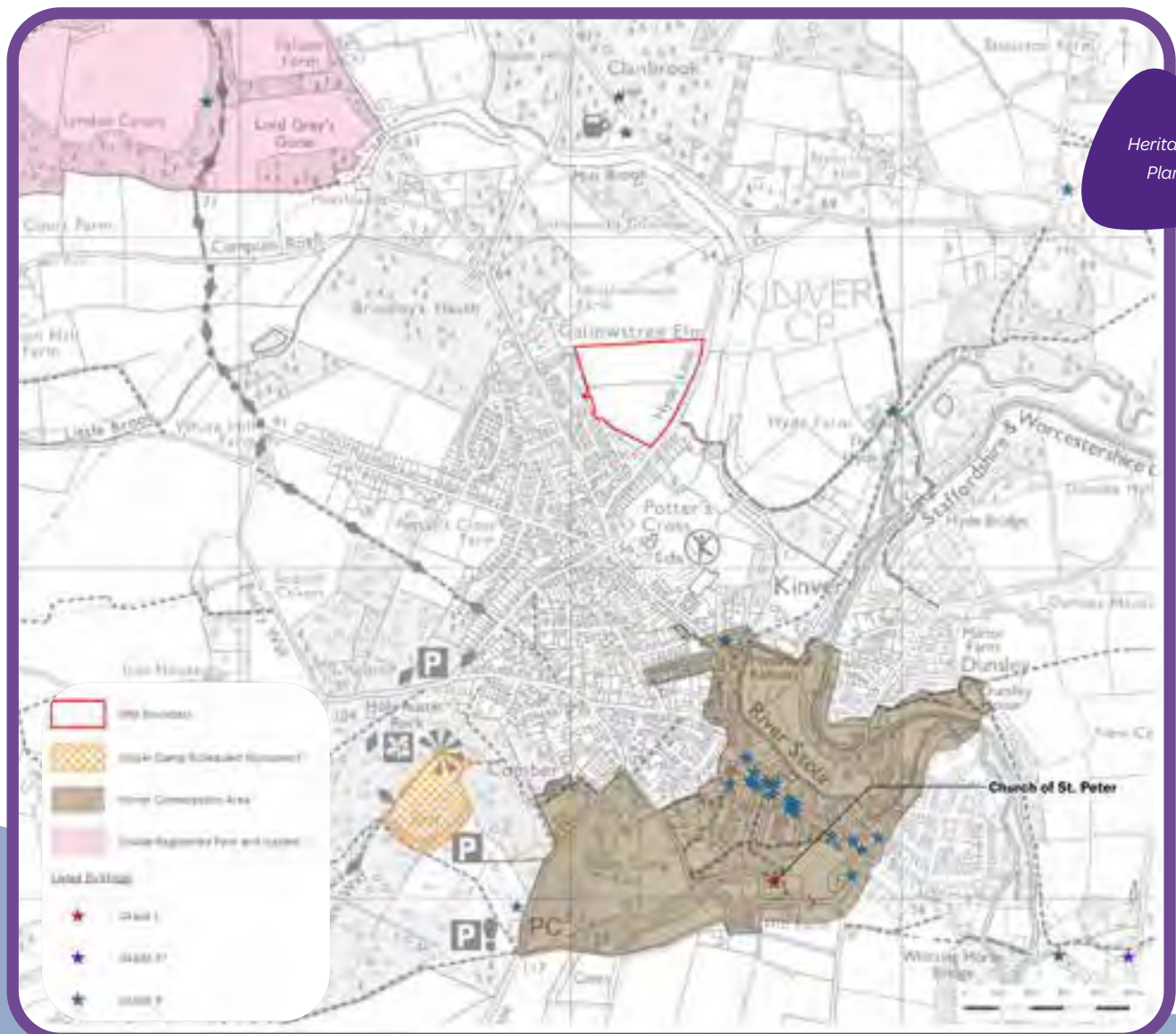
The site does not contain any 'designated heritage assets' and neither is it located within the boundary of such an asset. There are no heritage constraints to the delivery of the site for development or in respect of its capacity to accommodate development.

The site is situated 1.3 km north of the Church of St. Peter Grade I listed building and 1.1 km north-north east of the Kinver Camp Iron Age hillfort Scheduled Monument, which both occupy the prominent ridge overlooking Kinver, and characterise the settlement's historic villagescape. It is located 550 m to the north of the Kinver Conservation Area.

The site is distant, and, whilst it is visible, there is nothing significant about it which contributes positively to the setting or the significance of these designated heritage assets. It is joined by 20th century housing estates accessed along a series of cul-de-sacs on the east side of Enville Road and the properties fronting the sides of Hyde Lane, to the west and east respectively.

It is concluded to be very unlikely that these designated heritage assets would be harmed by development within the site, in large part because of the intervening distance and land use.

Please refer to Appendix 2 of the Vision Document for the Site Heritage Appraisal.



Drainage

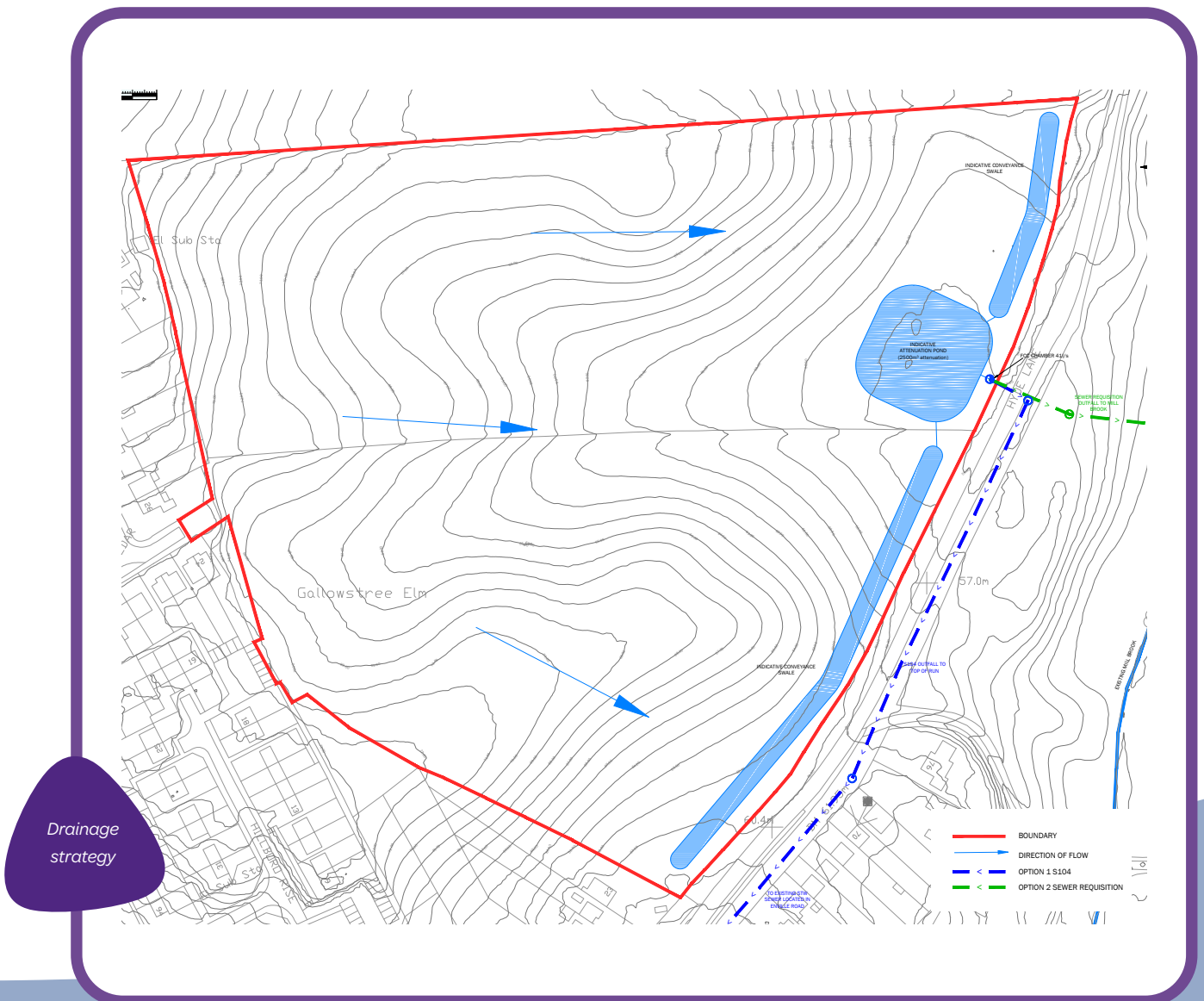
Fluvial flooding, occurs when a river or stream is unable to take on water draining in to it from surrounding land. The additional water causes the water to rise above its banks or retaining structures and subsequently flows onto the land.

The Environment Agency Indicative Flood Zone Mapping shows that the proposed development site falls within Flood Zones 1 (Low risk), meaning the site is not considered at risk of flooding from a watercourse or river.

Pluvial flooding refers to flooding from rainfall and the associated runoff. Surface water flooding is defined as flooding caused by rainfall generated overland flow before the runoff enters a watercourse or sewer. In such events, sewerage and drainage systems and surface watercourses may be entirely overwhelmed.

Surface water (pluvial) flooding will usually be a result of extreme rainfall events, though may also occur when lesser amounts of rain falls on land which has low permeability and/or is already saturated, frozen or developed. In such cases overland flow and 'ponding' in topographical depressions may occur.

It is understood that run off from Cedar Gardens to the West flows across the site in a low channel indicated from a comparison of EA data and LIDAR data, as shown on the plan below. This low and medium flood risk strip turns to a high risk when Hyde road is reached, due to a low spot in the topography. The pluvial flood route will be taken into account and considered as part of any future development layout.



Option 1 – Approximately 200 dwellings

This option proposes approximately 200 dwellings and associated open space, and has the potential to deliver a new doctor's surgery / community building.

As well as much needed new family homes, the proposal includes significant levels of Public Open Space along Hyde Lane resulting in a development set back, helping to retain the rural character of this rural route. With the exception of two new access points off Hyde Lane, all existing trees along the site boundary and existing hedgerows will be retained and enhanced, ensuring development has minimal impact on the surrounding character of the area.

Other features include naturalised attenuation in the form of SUDs and swales helping to support local biodiversity and mitigate impacts of flooding, as well as new native tree/shrub planning to help support local wildlife and act as a meaningful amenity to local residents. Proposals also include a new Local Equipped Area of Play (LEAP) for use by new and existing residents of the village.

Whilst representing the option containing the largest quantum of development, this option represents a sensitive and considered design solution to fulfilling long-term housing need.

Key

1. Access points
2. Main roads
3. Share streets
4. Lanes
5. Parking spaces
6. Rear gardens
7. Share surfaces
8. Pedestrian paths
9. LEAP (Local Equipped Area of Play)
10. Existing vegetation (trees and hedgerows)
11. Proposed trees
12. Attenuation basin
13. Public Open Space



Option 1 –
Approximately
200 dwellings



Hyde Lane

Option 2 – Approximately 110 dwellings

This option would respond to the scenario whereby the Local Plan Review needed to allocate circa 110 dwellings at Kinver. Similarly to Option 1, this option responds to the surrounding landscape and topography of the site, and includes the potential for a doctor's surgery / community building.

Key

1. Access points
2. Main roads
3. Share streets
4. Lanes
5. Parking spaces
6. Rear gardens
7. Pedestrian paths
8. LEAP (Local Equipped Area of Play)
9. Existing vegetation (trees and hedgerows)
10. Proposed trees
11. Attenuation basin
12. Public Open Space



Option 2 –
Approximately
110 dwellings



Option 3 – Approximately 45 dwellings

The most compact scale of development being considered, this option comprises around 45 new homes seeks to meet Kinver’s housing needs in a modest form.

This option proposes containing development to only the southern of the two fields which make up the Hyde Lane site, retaining the remainder of the southern field as Public Open Space and meadow grassland. Development is focused on the parts of the site least visible from the surrounding countryside, in particular along the lowest parts of site’s south-western boundary either side of the ridge which runs centrally through the site’s southern field. The proposals also allow for the creation of a positive interface between Kinver and the surrounding countryside.

The remainder of the southern field will be utilised as natural and meadowed Public Open Space including naturalised attenuation in the form of SUDs and swales helping to support local biodiversity and mitigate impact of flooding, as well as new native tree/shrub planting to help support local wildlife and act as a meaningful amenity to local residents. Proposals also include a new LEAP for use by new and existing residents of the village. With the exception of trees removed to allow for the single point of access being proposed, all existing trees and hedgerows will be retained and enhance with nature species.

Limited to around 45 residential units, this modest proposal not only meets the short-term housing need for the village, it does so in a way which ensures impact on the character of the village are kept to a minimum whilst ensure the rest of the site is made available to new and existing residents as a valuable wildlife and recreation amenity.

Key

1. Access points
2. Main road
3. Shared streets
4. Lanes/ shared driveways
5. Parking spaces
6. Rear gardens
7. Pedestrian paths
8. LEAP (Local Equipped Area of Play)
9. Existing vegetation (trees and hedgerows)
10. Proposed trees
11. Attenuation basin
12. Public Open Space
13. Public footpath



Option 3 –
Approximately
45 dwellings



Hyde Lane



A vision for a new sustainable community within a relaxed landscape setting for Kinver.

Summary and conclusions

This Vision Framework document has been prepared on behalf of Bellway, in response to the growing housing requirements of Kinver and the wider area, and the need for South Staffordshire Council to plan strategically for sustainable housing growth to help meet the needs of future generations.

It seeks to demonstrate that land at Hyde Lane, Kinver is a suitable, sustainable and deliverable site for future development and is the most logical location for future housing.

Through a robust assessment of the site's spatial and environmental context, it has been demonstrated that the land at Hyde Lane is both suitable and appropriate for a sustainable and high quality future residential development.

As demonstrated by this Vision Document and the three options presented, the site has inherent flexibility to deliver a range of development options which can respond to Kinver's housing needs to be identified in the emerging South Staffordshire Local Plan Review. Bellway is keen to work with South Staffordshire Council, Kinver Parish Council, and the local community to evolve its proposals for Hyde Lane further.

It is concluded that the site is the most logical and sustainable location for future development to meet the housing needs of Kinver, as well as South Staffordshire as a whole.





APPENDIX 1

Landscape Position Paper



Land West of Hyde Lane, Kinver

Landscape Position Paper

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1 INTRODUCTION, PURPOSE AND APPROACH

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Bellway Homes (hereafter referred to as 'the promotor') to prepare a Landscape Position Paper, which examines the prospect of future development situated on Land West of Hyde Lane, Kinver (hereafter referred to as 'the site').
- 1.2 The site is situated in Staffordshire, within the administrative area of South Staffordshire District Council, which acts as the statutory planning authority. South Staffordshire District Council has commenced a District Plan Review to identify land to accommodate the remainder of the adopted South Staffordshire District Plan housing requirement.
- 1.3 This Landscape Position Paper provides a preliminary appraisal of the site to inform the early consideration of its design and its promotion in the planning process. The Position Paper has been informed by a desk-based review of available data, policy, landscape character publications, mapping and by a site visit undertaken by an experienced Chartered Landscape Architect during June and November 2019 and May 2024.
- 1.4 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute¹ specialising in the assessment of the effects of proposed development on the landscape.

2 SITE LOCATION AND SITE DESCRIPTION

- 2.1 The existing site comprises a parcel of land roughly triangular in shape. The site is located at Ordnance Survey Grid Reference (OSGR): SO 84233 84561 (centre of the site).
- 2.2 The site is within the West Midlands Green Belt. However, there are no National or Local landscape designations situated within or adjoining the site.
- 2.3 The site lies to the immediate west of Hyde Lane, on the northern side of the village and has a predominantly easterly aspect with the north-western corner of the site lying at around

¹ LI Practice Number 1010

76m above Ordnance Datum (aOD) and the north-eastern corner at around 56m aOD. The southern tip of the site lies at circa.60m aOD, see **Image EDP 2.1**.



Image EDP 2.1: View within the site looking west across landform rising upwards towards the western site boundary. Photograph taken at OSGR: SO 84397 84688 (during May 2024).

2.4 The site boundaries comprise the following:

- To the east, the site is bound by Hyde Lane which is defined by a slight bank with trees and an outgrown hedgerow. The boundary has gaps (more noticeable in wintertime) which allow regular open views from the road corridor across the site, see **Image EDP 2.2** overleaf;
- To the west, the site is bound by rear boundaries of neighbouring properties located off Cedar Gardens and Hillboro Rise. Several of these properties have rear elevations or raised decks which seek to take advantage of the expansive views available to the east. The physical boundary to the site here is therefore an untidy, unmitigated sequence of rear garden fences of various types and open views into domestic rear gardens with all the associated features and paraphernalia, see **Image EDP 2.3** overleaf;
- To the north, the boundary comprises an earth embankment topped with a poor quality, gappy hedgerow. At its western end, the hedge contains a number of mature trees, see **Image EDP 2.4** overleaf; and
- To the south, the boundary comprises the rear/side boundaries of residential properties off Hyde Lane. These properties have substantial rear gardens and their boundaries are defined by hedges/planting and fences, see **Image EDP 2.5** overleaf.



Image EDP 2.2: View at Hyde Lane along the site's eastern boundary. The view is looking northwards along the road. Photograph taken at OSGR: SO 84403 84603 (during May 2024).



Image EDP 2.3: View along western site boundary which borders Cedar Gardens. The view is looking northwards. Photograph taken at OSGR: SO 84085 84479 (during May 2024).



Image EDP 2.4: View along the existing field hedgerow along the northern site boundary. The view is looking north-east towards Hyde Lane. Photograph taken at OSGR: SO 84170 84675 (during May 2024).



Image EDP 2.5: View from within the site looking south/south-east towards the site boundary with Hyde Lane and rear of existing residential development on Hyde Close. Photograph taken at OSGR: SO 84137 84428 (during May 2024).



Image EDP 2.6: View from within the site on the north-western edge of the site. This view is looking south-west across the site and the existing residential development situated off Enville Road. Photograph taken at OSGR: SO 84397 84688 (during May 2024).

- 2.4 The site itself comprises two field parcels separated by a dilapidated hedgerow with a sparse line of deciduous Larch trees, see **Image EDP 2.6** above. The latter appear overly mature and in relatively poor condition.
- 2.5 The most notable feature of the fields is their topography, with the broadly easterly aspect complicated by more localised undulations aligned in an east-west alignment, causing a 'ripple' effect moving southwards through the site.
- 2.6 There is no public access available to the site and no Public Rights of Way (PRoW) which pass through or adjoin the site. Additionally, there are no themed, promoted, or long-distance walking routes which pass the site within its immediate environment, see **Image EDP 2.7** overleaf.

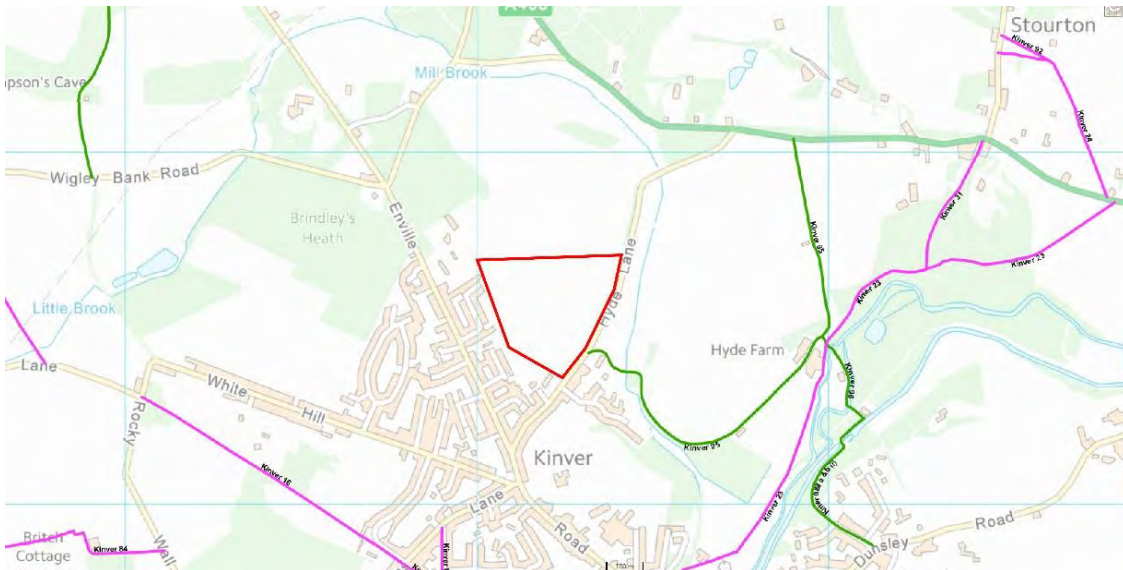


Image EDP 2.7: Extract from the Staffordshire County Council's online Countryside Access and PRoW Map. The site is outlined with a solid red line.

- 2.7 Overall, the site does not demonstrate any landscape features worthy of protection and retention other than the trees/hedgerows at its boundaries, many of which would benefit from improved management. The site's topography is an interesting characteristic and should inform the layout of any future development.

3 LANDSCAPE CHARACTER

- 3.1 The site is situated within a landscape that has been characterised at National and County level. At National level, the site is located within National Character Area (NCA) 66: Mid Severn Sandstone Plateau, see **Image EDP 3.1** below.

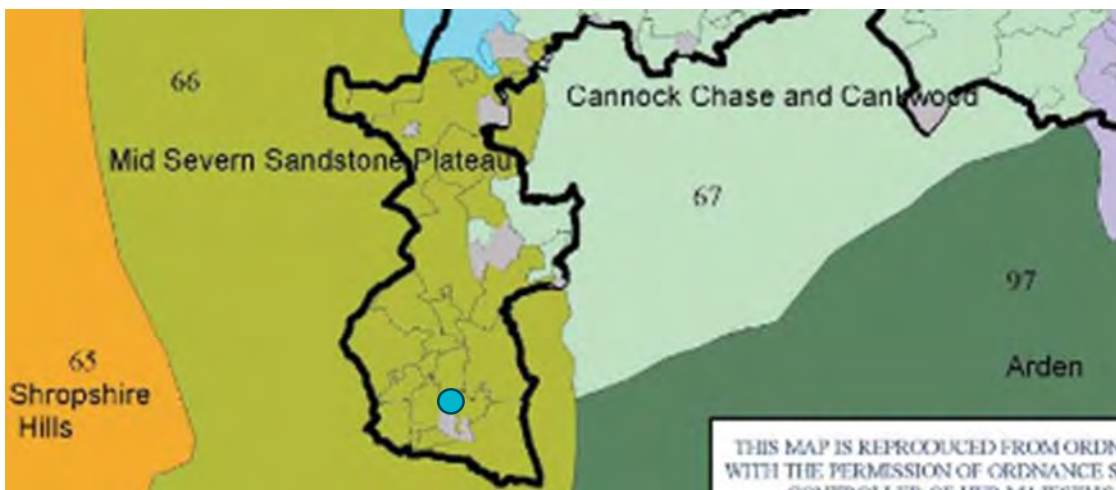


Image EDP 3.1: Extract from Map 2 of the Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011'. Site broadly indicated with a blue circle.

- 3.2 The County-wide landscape character assessment comprises the 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011', which remains current at

the time of writing this Position Paper. The County Council identify the site within the Sandstone Estatelands Landscape Character Areas, see **Image EDP 3.2** below.

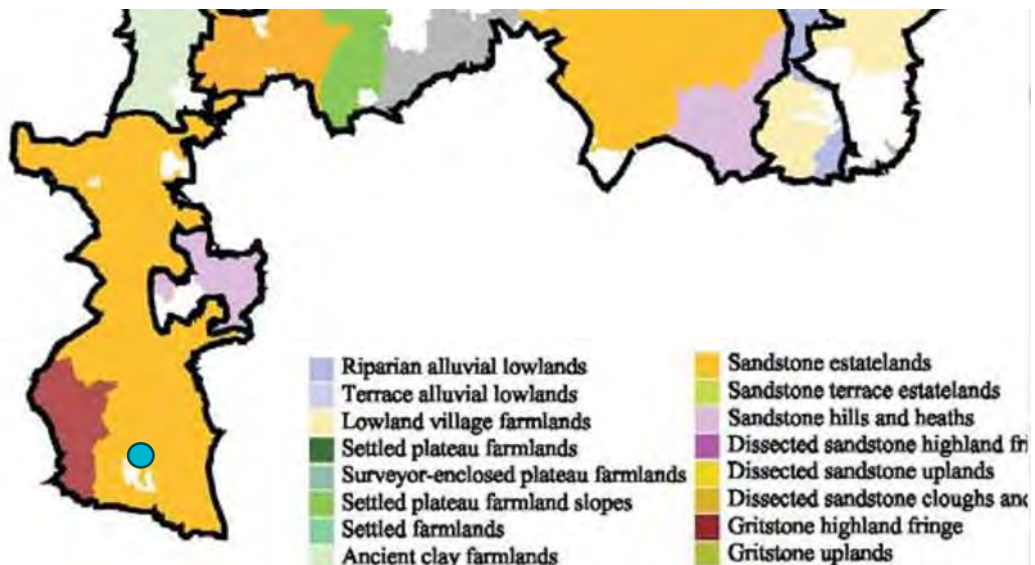


Image EDP 3.2: Extract from Map 4 of Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 - 2011'. The site is situated within the NCA 66: Mid Severn Sandstone Plateau, which is in the southern part of the County. Site broadly indicated with a blue circle.

3.3 The character of the Sandstone Estatelands is described as follows:

"The woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type...Settlement is sparse, and characterised by expanded hamlets and wayside cottages....This is a landscape that appears far more wooded than it actually is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places. The slopes in turn give way to well-treed valleys..."

3.4 The County Council continue:

"Villages are expanding with the increase in commuter dwellings and small lanes show the obvious signs of becoming well used rat-runs. Where farmland abuts the conurbation the landscape reflects this influence, hedgerow deterioration being more evident and horsey culture becoming frequent."

3.5 The assessment notes the following landscape features common to this landscape character area. The underlined features are common to the site and its immediate surroundings:

- "Estate Plantations;
- Heathy ridge woodlands;
- Hedgerow oaks;
- Well tree'd stream valleys;

- Smooth rolling landform with scarp slopes;
- Red brick farmsteads and estate cottages;
- Mixed intensive arable and pasture farming;
- Large hedged fields;
- Halls and associated parkland; and
- Canal.”

3.6 Further to this, under the heading of ‘Incongruous Landscape Features’, the County Council raises the following points relative to this landscape character area. The underlined features are common to the site and its immediate surroundings:

- “Power lines;
- Village expansion;
- Urban edge;
- Modern farm buildings;
- Deteriorating hedgerows;
- Commuter dwellings; and
- Busy roads.”

3.7 Naturally, the degrading effect of such factors varies across the Sandstone Estatelands landscape character area, with such factors, as aforementioned, having a greater, or lesser, effect on the intactness of the landscape character. In their assessment, the County Council asserts that the “*landscape character type is locally sensitive to the impacts of development and land use change*”.

3.8 A site visit was undertaken by a Chartered Landscape Architect during both summer and winter time, in June and November 2019 and May 2024. During all site visits, the character of the site was appraised. With reference to the key characteristics listed above for the Sandstone Estatelands, a review finds that there are a number of key differences within the site, including:

- No representation of: “...*Mixed intensive arable and pasture farming*”, which is more reflective of land practices further north of the site within the wider open countryside, beyond nearby estate plantations associated with the Enville and Stallybridge Estate (i.e. ‘The Million woodland’). Consequently, the presence of ‘Halls and associated parkland’ are outlying to Kinver, and not within proximity of the site;
- No representation of: “...*Commuter dwellings and urban edge*”, albeit the site is situated on the village edge, adjacent to well established modern development (latter

half of the 20th century). Traffic along Hyde Lane is frequent, with this route being one of over half a dozen routes into Kinver. Consequently, whilst Hyde Lane is a well-used route, it is not considered to be a main arterial route, like the A458 Bridgnorth Road (approximately 0.5km north of the site);

- No representation of “*Large hedged fields*”, with the site situated in a field pattern of small to medium scale, and hedgerows being commonly gappy in this location due to either age, being outgrown, or being degraded;
- No representation of “*Red brick farmsteads and estate cottages*” as the site does not contain development, and development surrounding the site is modern day, ‘suburban’ style-built form; and
- No representation of ‘Canals’ and ‘Well tree’d stream valleys’ at the site, or within its vicinity, albeit these features can be found in the wider landscape.

3.9 In addition to this, the field assessment noted that there is limited visibility towards the site where the perception of the area is of an urban edge or modern farm buildings.

3.10 It is considered that the site makes only a limited contribution to the key characteristics of the landscape of the Sandstone Estatelands Landscape Character Area (LCA). Additionally, there are a number of landscape detractors discernible from the site. These detractors are predominantly associated with the position of the site on the village edge of Kinver and the perception of existing residential development within the site, see **Section 2**, **Image EDP 2.3** and **Image EDP 2.5** above.

4 VISUAL AMENITY

4.1 The site’s location to the northern side of the village, adjacent to well established modern development (latter half of the 20th century) to the west, means that it has the potential to integrate well with the existing settlement when seen in wider views. During the site visit, the Zone of Visual Influence of the site (i.e. those areas of the surrounding landscape which have potential views of the site) was established, and these areas were visited to establish whether ground level views were accessible and if so, how the site appeared.

4.2 **Image EDP 4.1** overleaf illustrates the location of PRoW within the wider environment of Kinver and the open countryside which surrounds the village. This extract from Staffordshire County Council’s PRoW map demonstrates that PRoW are found to the east (closest to the site), and most abundantly, at Kinver Edge and Holy Auston Rock Cottage (south of the village settlement).

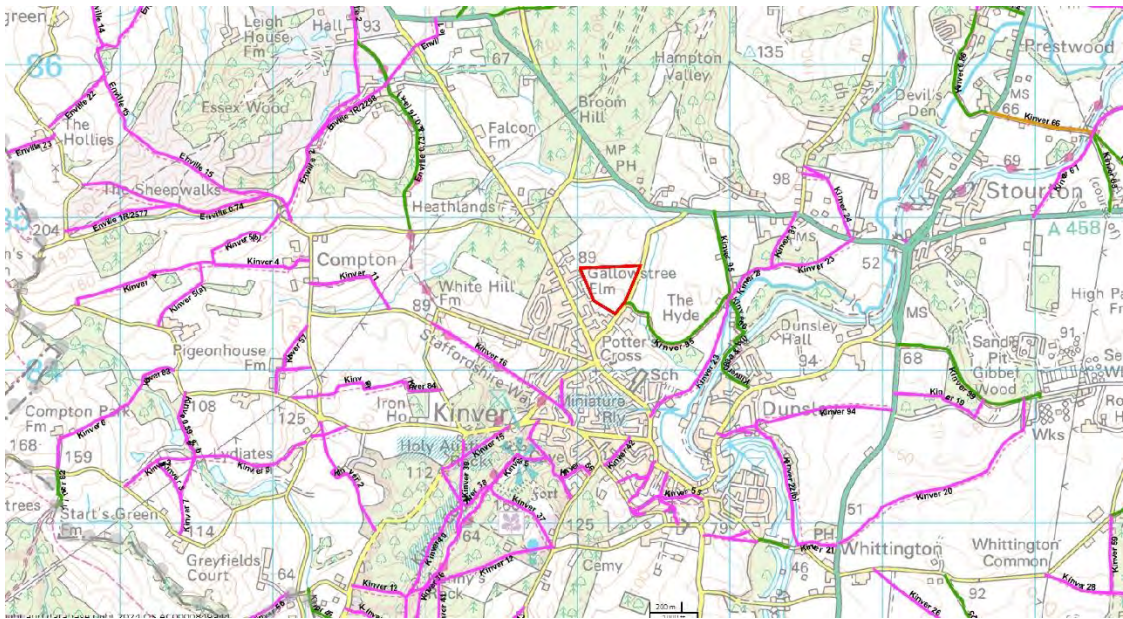


Image EDP 4.1: Extract from the Staffordshire County Council's online Countryside Access and PRow Map. The site is defined with a solid red line.

4.3 The broad extent of the view available from each of these areas is described below:

- To the east of the site, the landscape is criss-crossed by a number of public footpaths. However, the topography of the landscape, coupled with existing vegetation, means that it is only the northern section of the path between Hyde Farm and the A458 from where there is any visibility of the site. Even here the view is heavily filtered by intervening vegetation (see **Image EDP 4.2** below);



Image EDP 4.2: View from Public Bridleway Kinver 95 looking west towards the site. Photograph taken at OSGR: SO 84945 84804 (during May 2024). There is limited opportunity to see the site from those PRow within the Local area due to the combined effect of landform and mature landscape features.

- From the adjacent Hyde Lane road corridor there are intermittent clear views across much of the site between the roadside trees and vegetation (see **Section 2, Image EDP 2.2** above);
- With the greatest degree of elevation above the village (164m aOD) Holy Austin Rock provides expansive panoramic views over the village and the landscape beyond. Within views towards the site from this location (see **Image EDP 4.2** below), the site appears well integrated with the existing settlement, appearing as a natural ‘rounding off’ of the northern edge; and



Image EDP 4.3: View from the junction of Public Footpaths Kinver 34 and Kinver 56 looking across Kinver village towards the site, which is approximately 1.1km north-east. Site extent broadly indicated by red line. Photograph taken at OSGR: SO 83608 83452 (during May 2024). The site is only discernible along its northern boundary, with the wider parts screened by intervening residential dwellings.

- From the residential properties off Cedar Gardens, Hillboro Rise and Hyde Lane which front or back onto the site, there are open views (see **Section 2, Image EDP 2.2** above). It is clear that the elevated properties off Cedar Gardens and Hillboro Rise to the north or west respectively have a particularly open view over the site to the countryside beyond. Although such views are not protected in planning policy terms, any future application should take this into consideration.

4.4 Overall, the site’s easterly aspect and the topography of the local landscape results in a relatively limited visual envelope which integrates the site with the existing village form. The sloped orientation of the site and the mature landscaping (in part) along the eastern and

southern boundaries, as well as local landform and mature landscape features east and west in the wider open countryside around Kinver, mean that the site sits in a bowl visually with views filtered, if not screened entirely, by the adjoining village settlement.

- 4.5 That said, there are views across the site (PRoW from elevated landform predominantly) and from the adjacent Hyde Lane roadway (east of the site), but at all times the site is visible in the context of the existing village edge.

5 LANDSCAPE SENSITIVITY

- 5.1 In July 2019, South Staffordshire District Council published their 'South Staffordshire Landscape Sensitivity Assessment' (Final Report) (the sensitivity assessment). This assessment forms an important evidence base for the preparation of the South Staffordshire Local Plan.
- 5.2 The purpose of this study was to provide an assessment as to the extent to which "*the character and quality of landscape abutting is in principle susceptible to change as a result of introducing new built form*".
- 5.3 This study specifically considers new residential development. The settlement of Kinver is defined by this study as a 'Main Service Village' and therefore, a Tier 4 settlement in this study.
- 5.4 In terms of scope, this study considers the landscape sensitivity of land within the West Midlands Green Belt which is "*immediately adjacent to selected South Staffordshire settlements (Tier 1 - 4 settlements) encompassing locations identified through the South Staffordshire 'Call for Sites' exercises, and land adjacent without promoted sites*".
- 5.5 The report defines landscape sensitivity as "*the relative extent to which the character and quality of an area (including its vital attributes) is likely to change as a result of introducing a particular type of development*".
- 5.6 This study appraises parcels of land, some of which are large and expansive tracts of land, and the study includes the site within a wider parcel of land (identified by the report as SL4), see **Image EDP 5.1** below.

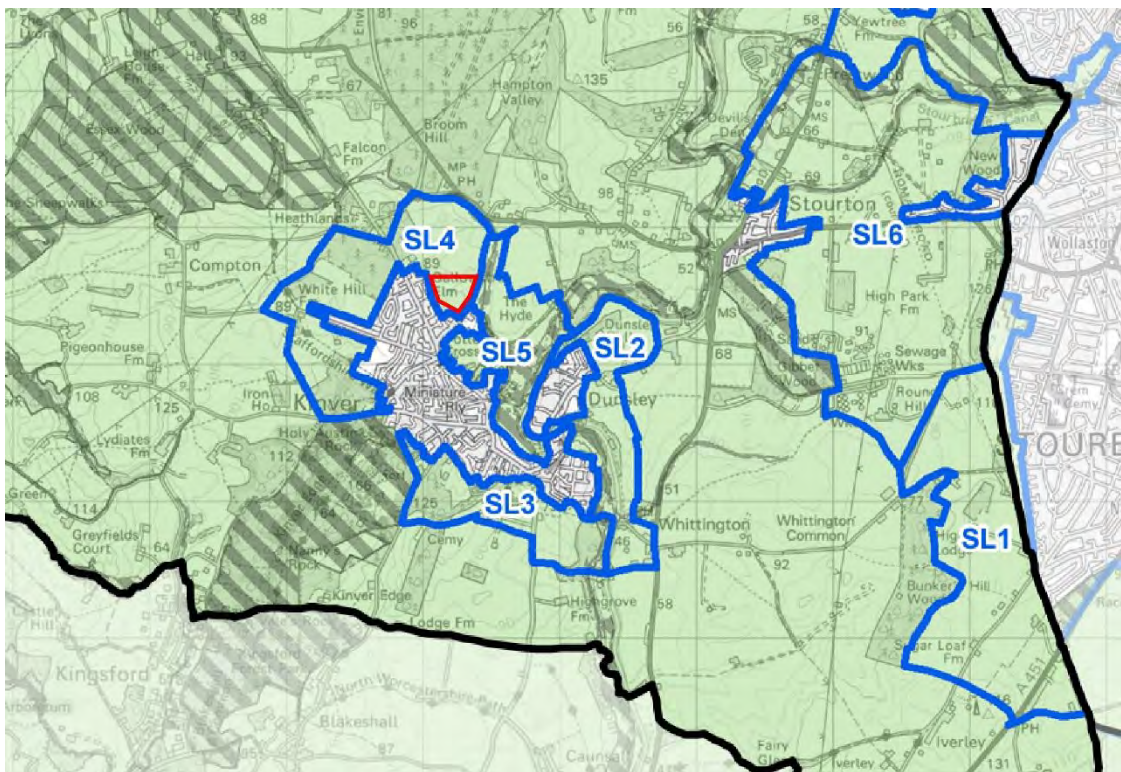


Image EDP 5.1: Extract from the South Staffordshire District Council's South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019). The site is defined with a solid red line.

- 5.7 With reference to Table 4.1 of the study, land parcel SL4 has an overall quantum of nearly 120 hectares (ha), of which the site forms only a minor proportion. The report assesses land parcel SL4 as having an overall landscape sensitivity of Moderate - High.
- 5.8 Within Chapter 3 of this study, the rating of Moderate – High is not defined specifically. The report instead defines only Low, Moderate and High. Nonetheless, the Council consider that the land parcel has a relatively high landscape sensitivity and susceptibility to change, with this land parcel having some distinct, if not strong, character and qualities.
- 5.9 With consideration of the published methodology for this study, and EDP's own field-based assessment, EDP considers that the site has a lower landscape sensitivity than the wider land parcel for the following reasons:
- The site has limited features of value, with its topography being its most interesting aspect. It's existing boundary and internal vegetation is poorly managed;
 - The site makes only a limited contribution to the key characteristics of the landscape of the Sandstone Estatelands LCA, with degrading and gappy hedgerows with a lack of hedgerow Oaks; and
 - There are a number of landscape detractors discernible from the site, which are predominantly associated with the position of the site on the village edge of Kinver, and the perception of existing residential development within the site, which overlooks the site from the western edge.

- 5.10 Further to the above, landform within the site rises from the east to the north-western corner, with the site being enclosed by existing residential development to its western edge. Landform beyond the northern site boundary, and the western village edge continues to rise; see **Section 4, Image EDP 4.3** above.
- 5.11 Beyond these physical constraints to the site, the landform is enclosed by ridgelines with mature woodland, similar to estate plantations and heathy ridge woodlands typical of the host LCA, Sandstone Estatelands; see **Section 3**.
- 5.12 Consequently, the site is experienced at a lower level to these landscape features and surrounding built form, both of which limit and contain the site. For these reasons, the site is experienced as being within the settlement edge of Kinver and influenced by its domestic land use and character. When on-site, especially in winter, one is aware of the presence of the surrounding village related land use, albeit on the edge of the village, rather than feeling divorced from it, in the open countryside, like aspects of the wider land parcel SL4.
- 5.13 From a landscape and village character perspective, the domestic curtilages discernible from the site contribute to the perception of the site as village edge (see **Section 2, Images EDP 2.1, 2.3, 2.5 and 2.6** above).
- 5.14 The wider land parcel SL4 is situated further out of the village, and through its combination of elevated landform and mature woodland blocks around White Hill Farm, White Hill and Wigley Bank Road, the wider land parcel is experienced as divorced, and poorly related to Kinver. As a result, these locations are considered to have a greater landscape sensitivity than those areas on the periphery of Kinver.
- 5.15 Consequently, given the above factors, it is concluded that the site has only a Moderate landscape sensitivity, at most.

6 IMPLICATIONS FOR MASTERPLANNING

- 6.1 Any future development of the site should be informed by a Landscape and Visual Impact Assessment, the findings of which should help shape the scheme design. At this early stage, the preliminary landscape and visual appraisal has identified a series of key principles for the design of future development which would assist in mitigating its landscape and visual effects and ensure it integrates effectively with the existing village form. These are:
- The existing external field boundaries to the north, south and east should be strengthened with additional tree and hedgerow planting. The development should provide (via suitable planning conditions) a long-term management plan for the tree and hedgerow stock to ensure its long term health and vigour;
 - The site will drain naturally to the eastern edge, with the north-eastern corner being the lowest point. On this basis, the eastern edge of the site should be utilised for sustainable drainage attenuation features designed as attractive landscape components. In the southernmost corner of the site, a permanently wet feature (with freeboard to allow for attenuation) could provide an attractive focal point in this part of the village, set within a compact 'village green' style open space. This would help

connect the new development with the existing settlement. Further north on the eastern edge, seasonally wet attenuation features could provide a useful 'soft' buffer to Hyde Lane and the countryside beyond, as well as providing biodiversity enhancement in this part of the site;

- Irrespective of how vehicular access is provided (whether from Hyde Lane or from Cedar Gardens/Hillboro Rise) a strong green link should be provided (if land ownership allows) from within the southern part of the site to the centre of the village via Hyde Lane;
- The layout of the site should seek to work with and reflect the existing site topography;
- There is an opportunity to create a central nodal space which capitalizes on the distant views available to aid the 'sense of place' of the development;
- Existing rear gardens to Cedar Rise, Hillboro Rise and Hyde Lane should be 'backed' with new development, but garden lengths and building heights should be carefully considered to try to mitigate effects on residential views and amenity. Single or one-and-a-half-storey dwellings might be considered on the upper edge of the development if appropriate/viable; and
- Architectural proposals should seek to reflect the vernacular of the older parts of the village.

7 CONCLUSIONS

7.1 The site to the west of Hyde Lane, Kinver, lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed. In elevated views from Holy Austin Rock to the south of the village, the site would appear as a 'rounding off' of the existing settlement, avoiding any perception of 'sprawl' into the countryside beyond.

7.2 The following main matters have been identified within this report.

Relevant Designations:

- The site is situated within West Midlands Green Belt; however, the site does not lie within, or adjoin any Nationally or Locally designated landscape; and
- Whilst there are a number of PRoW within the wider open countryside, and around the adjoining settlement of Kinver; there is no public access into or adjoining the site.

Visual Amenity:

- Visually, the site is enclosed through the combination of landform and mature landscape features in the open countryside surrounding the site. Additionally, the adjoining residential development along the south-east to western site boundary, encloses the site and limits direct views from the adjoining village;

- Views of the site are limited to a small number of locations around the village itself, with no long-distance views identified. In addition to the view from Holy Austin Rock to the south, there are limited views available from Hyde Lane, from the footpaths to the east of the site and from existing properties which surround it;
- In many situations, the site is enclosed through the combination of landform and mature landscape features in the open countryside surrounding the site. Additionally, the adjoining residential development along the south-east to western site boundary, encloses the site and limits direct views from the adjoining village settlement; and
- Generally, EDP finds that where the site is visible, it is experienced as well integrated with the existing settlement, appearing enclosed in part by existing development, public roads, and views are filtered by mature landscape features in the wider landscape. For instance:
 - The elevated landform to the northern site edge can be discernible from the wider surroundings of the site. However, views from PRow are filtered by intervening mature landscape features, see **Section 4, Image EDP 4.2**; and
 - There is opportunity to view the site from the elevated landform south-west of Kinver from along PRow around Kinver Edge and Holy Austin Rock. These Local landmarks provide expansive panoramic views. However, the site is partially screened by intervening residential built form and situated within landform which rises northwards beyond the quantum of the site, **Section 4, Image EDP 4.3**.
- The site is overlooked by several residential dwellings, see **Section 2, Image EDP 2.3**. These receptors are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity is protected, however, and as such, the scheme design should be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high quality development in architectural terms.

Landscape Character:

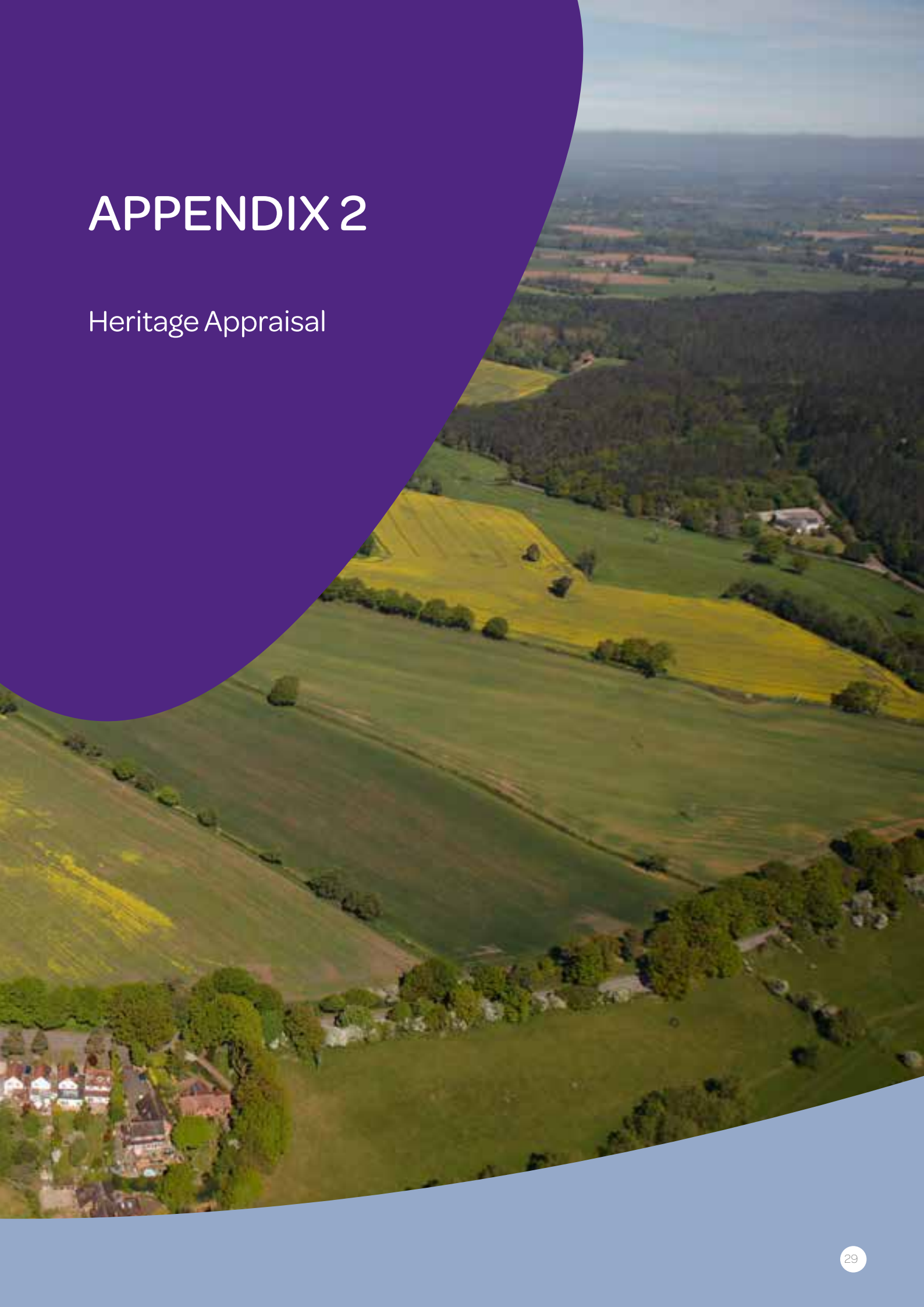
- Heathy, wooded ridgeline, undulating sloped landform and mature hedgerow oak trees within extensive hedgerows are characteristic of the landscape, but these features have limited representation within the site, which is more open than the wider open countryside (especially to the north of the site). Therefore, there is an opportunity to strengthen local landscape character through new landscape planting, hedgerow retention and enhancement;
- The site makes only a limited contribution to the key characteristics of the landscape of the Sandstone Estatelands, with typical landscape features appearing more intact in the wider open countryside surrounding Kinver village; and
- The mature tree groups along the eastern edge and the rising landform to the northern and western site edges (bounded by existing residential development) considerably reduces the perceptual relationship of the character of the site with the wider Sandstone Estatelands.

- 7.3 In conclusion, the site to the west of Hyde Lane, Kinver, Staffordshire lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed. In elevated views from Kinver Edge and Holy Austin Rock to the south of the village, the site would appear as a 'rounding off' of the existing settlement, avoiding any perception of 'sprawl' into the countryside beyond.
- 7.4 With respect to landscape character, the site has limited features of value, with its topography being its most interesting aspect. Its existing boundary and internal vegetation is relatively sparse and poorly managed. Development of the site would provide an opportunity to improve the tree stock of the site and to bring all vegetation into long term management.
- 7.5 Views of the site are limited to a small number of locations around the village itself, with no long-distance views identified. In addition to the view from Holy Austin Rock to the south, there are limited views available from Hyde Lane, from the footpaths to the east of the site and from existing properties which surround it.
- 7.6 The over-arching landscape strategy should look to integrate the site with Kinver, incorporating the existing trees and hedgerows and facilitating green infrastructure through the site, breaking up the mass of the development and offering new recreation links.
- 7.7 Subject to these considerations, further technical studies and development of a well-designed masterplan and landscape strategy, there is no in-principle reason to prevent development of the site in landscape and visual terms. In conclusion, this Position Paper has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.



APPENDIX 2

Heritage Appraisal



Land to the West of Hyde Lane, Kinver

Heritage Appraisal

edp4711_r004b

QA: CJo/ACr_GLe/NHa_220524

1 INTRODUCTION

- 1.1 This report has been researched and prepared for Bellway Homes by The Environmental Dimension Partnership Ltd (EDP) and sets out an archaeology and heritage appraisal of Land to the West of Hyde Lane, Kinver, with the aims being to (1) confirm its deliverability and capacity for development and (2) provide early guidance on the design of the proposals, to avoid or minimise adverse impacts from development and hence support its promotion for residential development.
- 1.2 The site is situated in Staffordshire, within the administrative area of South Staffordshire District Council, which acts as the statutory planning authority. South Staffordshire District Council has commenced a District Plan Review to identify land to accommodate the remainder of the adopted South Staffordshire District Plan (SSDP) housing requirement.
- 1.3 This Appraisal has been informed by a desk-based review of data relating to heritage assets and is supported by a visit to the site and its immediate environs, undertaken in June and November 2019 and May 2024. This Appraisal should be read in conjunction with the preliminary Landscape Position Paper (report reference: edp4711_r005), which sets out the character of the site and establishes, in basic terms, its visual envelope.

2 SITE DESCRIPTION

- 2.1 The site lies on the northern edge of the village of Kinver, South Staffordshire, is centred approximately on National Grid Reference (NGR) 384206, 284563 and covers 8.4 hectares (ha) of farmland west of Hyde Lane.
- 2.2 To the west, it is bounded by the rear boundaries of residential properties on Cedar Gardens and Hillboro Rise, and to the south, by the rear and side boundaries of properties on Hyde Lane. To the north, the land within the site is separated from adjacent farmland by an earth embankment and hedgerow.
- 2.3 The site comprises two agricultural fields that are separated by a dilapidated hedgerow with a sparse alignment of larch trees.

- 2.4 The site has a predominantly easterly aspect. Its north-western corner lies at 76m above Ordnance Datum (aOD) and its north-eastern and southern corners lie at 56m aOD and 60m aOD respectively.
- 2.5 The LVA establishes that the site's easterly aspect, combined with the topography of the local landscape, results in a relatively limited visual envelope. To the east, intermittent views into and outwards from the site are available along Hyde Lane, through the existing roadside trees and vegetation.
- 2.6 On its west side, views outwards are restricted by the existing properties on Cedar Gardens and Hillboro Rise. Northward views are available through the gappy hedge, across farmland as far as a tree-lined local ridge c.300m distant.
- 2.7 To the south, there are outward views from the site across modern houses on Hyde Lane towards Kinver's village centre, where the parish Church of St Peter is discernible against the skyline through a break in the trees that line Kinver Edge.
- 2.8 Kinver Edge itself, including the local high point of Holy Austin Rock (164m aOD), forms a prominent feature as viewed from the site. There are panoramic views from Kinver Edge to the north, across the village of Kinver and the landscape beyond and, where relevant, these will be considered in the paragraphs below.

3 LEGISLATION AND POLICY REVIEW

Legislation

- 3.1 The relevant legislation concerning the treatment of scheduled monuments is the *Ancient Monuments and Archaeological Areas Act 1979*. This Act details the designation, care and management of scheduled monuments, as well as detailing the procedures that are needed to obtain permission for works that would directly impact upon their preservation.
- 3.2 The Act does not confer any statutory protection on the setting of scheduled monuments, although this is considered as a policy matter in the relevant paragraphs of the *National Planning Policy Framework (NPPF; DLUHC, 2023)*.
- 3.3 S66(1) and 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* set out the statutory duties of Local Planning Authorities (LPAs) in respect of the treatment of listed buildings and conservation areas (CAs) through the planning process.
- 3.4 Section 66(1) of the 1990 Act sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting.
- 3.5 Section 72(1) of the 1990 Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (NPPF)

3.6 The NPPF sets out the government’s approach to the conservation and management of the historic environment, including both listed buildings and conservation areas, through the planning process (Section 16).

3.7 The opening paragraph, 200, recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

3.8 Paragraph 206 concerns planning applications, stating that:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

3.9 NPPF paragraph 203 is relevant when it states that:

“In determining applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. the desirability of new development making a positive contribution to local character and distinctiveness.”*

3.10 Paragraph 205 considers the weighting given within the planning decision, with regard to impacts on designated heritage assets, stating that:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

3.11 Paragraph 206 considers the level of harmful effects on designated heritage assets and states that:

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional; and*
- b. Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional¹.”*

3.12 With regard to the decision-making process, paragraphs 207 and 208 are of relevance.

3.13 Paragraph 207 states that:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. The nature of the heritage asset prevents all reasonable uses of the site;*
- b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. The harm or loss is outweighed by the benefit of bringing the site back into use.”*

3.14 Paragraph 208 states that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

3.15 The threshold between ‘substantial’ and ‘less than substantial’ harm has been clarified in the Courts. Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847 are of relevance here, in the way they outline the assessment of ‘harm’ for heritage assets:

“What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.

Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to

¹ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether [i.e. destroyed] or very much reduced.”

3.16 In other words, for the ‘harm’ to be ‘substantial’, and therefore require consideration against the more stringent requirements of paragraph 207 of the NPPF compared with paragraph 202, the proposal would need to result in the asset’s significance either being “*vitiated altogether or very much reduced.*”

3.17 Paragraph 209 refers to non-designated heritage assets, identifying that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly effect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

3.18 In relation to non-designated heritage assets, footnote 72 explains the exemption to the ‘balanced judgement’ exercise outlined in paragraph 209, in cases where:

“Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”

3.19 Paragraph 212 of the NPPF sets out that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

South Staffordshire Local Plan

3.20 The South Staffordshire Publication Plan 2024 is currently under review and will contain updated and detailed development management policies. Whilst this is under review, the policies of the South Staffordshire Local Plan Core Strategy adopted in 2012, and the Site Allocations Document (SAD) adopted in September 2018, remain in place until their replacement by the new adopted plan.

3.21 Under Environmental Quality, Strategic Objective 5 is as follows: “*To protect, conserve and enhance the historic environment and heritage assets and ensure that the character and appearance of the District’s Conservation Areas is sustained and enhanced through management plans and high-quality design.*”

3.22 Within Core Policy 2 (Protecting and Enhancing the Natural and Historic Environment), the salient policy is EQ3 Conservation, Preservation and Protection of Heritage Assets. This policy sets out a number of means by which the preservation of South Staffordshire’s historic environment will be achieved. Those relevant to this Appraisal are as follows:

- “c The Council will ensure that development which affects a heritage asset or its setting will be informed by a proportionate assessment of the significance of the asset, including its setting, which is likely to be affected by the proposals. These will be judged by considering the extent to which an asset’s archaeological, architectural, historic or artistic interest will be harmed, including its conservation, in the interest of present and future generations; and*
- d In the case of development in a conservation area, proposals will be considered against any management plan and appraisal adopted for that area.*

Development proposals should be consistent with the NPPF, the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions) and other local planning policies.”

Kinver Neighbourhood Development Plan 2023-2038

- 3.23 The Kinver Neighbourhood Development Plan 2023-2038 was made in 2023. It includes the heritage related policies below.

Policy KN08: Historic Environment

- 1. “The layout of development must preserve or enhance evidence of burgage plots and avoid compromising the open character of gardens based on the burgage plot layout.*
- 2. Rock cottages and other rock cut structures and their settings should be preserved or enhanced.*
- 3. Where demolition of an historic building is justified, the replacement building should:*
 - a. Reinforce the predominant townscape character, including height, massing and setback from the road;*
 - b. Demonstrate exceptional design quality, to make up for the loss of historic fabric and character;*
 - c. Incorporate features to reduce carbon emissions, to compensate for the loss of embodied energy involved in demolition.*
- 4. Support will be given to works to upgrade the environmental performance of historic buildings, provided the works preserve or enhance the character of the historic building.*
- 5. Development should enhance the character and appearance of the Staffordshire and Worcestershire Canal Conservation Area or Stourbridge Canal Conservation Area, including waterway, towpath, other features and setting.”*

Policy KN09: Kinver Conservation Area

1. *“Buildings that contribute to the special architectural or historic interest and character of the Conservation Area should be preserved and sensitively reused, retaining their original architectural or historic features, as part of any development proposal.*
2. *Development within the High Street should complement the key townscape characteristics of the Conservation Area, including:*
 - a. *the predominant two or three storey height of buildings;*
 - b. *rear-of-the-pavement frontages;*
 - c. *layout and open gardens reflecting burgage plots.*
3. *Development within High Street shopping area must maintain active frontages and shopfronts at ground floor level.*
4. *Shopfronts should be designed to complement the building in their form, design and materials and surviving historic shopfronts or elements from historic shopfronts should be retained.*
5. *The reinstatement of historic shopfronts will be supported.*
6. *Roller shutters and projecting boxes should be provided internally and must not project forwards of the shopfront.”*

Kinver Conservation Area Management Plan (2011)

- 3.24 The historic core of Kinver is covered by a conservation area designation and this was most recently subject to the completion of a management plan by the Council in 2011. Most of the management plan concerns the boundary and buffer of the CA, and development within this defined zone.
- 3.25 As such, these do not apply to the proposed development of the site. However, section 3.2 concerns the protection of the broader landscape setting and views and is therefore of relevance to this Appraisal. The Council’s management plan identifies that:
- “3.2.1 *The landscape setting of the Kinver Conservation Area is very important. It has been established that new development on the edges of the conservation area affects views into and out of the conservation area, and can adversely affect the area’s special architectural or historic interest...;*”
- “3.2.3 *Views across the Kinver Conservation Area are very important given the dramatic topography and river- and canal-side location. The unique qualities of the conservation area rely on the continued protection of these views;*” and
- “3.2.5 *Action: The Council will also seek to ensure that these views remain protected from inappropriate forms of development and that due regard is paid to them in the formulation of public realm works or enhancement schemes.*”

3.26 Insofar as it is relevant, the legislation, policy and guidance detailed above will be addressed in the following sections.

4 HERITAGE BASELINE

4.1 The site does not contain any 'designated heritage assets' (see Annex 2 of the NPPF), nor is it located (either wholly or in part) within the boundary of such an asset. As such, there are no 'in principle' or overarching heritage constraints to the deliverability of the site for development or in terms of its capacity to accommodate development.

4.2 In respect of non-designated assets (again, see Annex 2 of the NPPF), an examination of data from the Staffordshire Historic Environment Record (HER) does not identify any known or recorded archaeological features or finds within the site's boundaries.

4.3 Turning to the wider surroundings of the site, the baseline data indicate the presence of a number of assets that require consideration by this Heritage Appraisal. These are discussed in turn below and are as follows:

- Grade II* Listed Enville Registered Park and Garden (NHLE ref. 1000114) and its component listed buildings;
- Grade I Listed Church of St Peter, Kinver (NHLE ref. 1230950);
- Kinver Camp Iron Age Hillfort Scheduled Monument (NHLE ref. 1015432);
- Kinver Conservation Area; and
- Holy Austin Rock Houses, Kinver Edge (non-designated asset; MST1158).

4.4 These five heritage assets will be considered, in terms of whether and to what extent they impose a constraint on the deliverability and/or capacity of the site for development, in the following paragraphs.

Grade II* Listed Enville Registered Park and Garden (NHLE Ref. 1000114²)

4.5 The citation states that the manor of Enville was held from the early 16th century by a minor branch of the Grey family, which survived the aftermath of Lady Jane Grey's brief assumption of English rule in 1553. A new house was built on the estate in the mid-16th century and forms the core of the present Grade II listed Enville Hall (NHLE Ref. 1230636).

4.6 The house was enlarged by stages in the late 17th and early 18th centuries and again in the 1770s. Various alterations were also made in the early 20th century. The park itself was a creation of the mid-18th century, occupying land that had originally been a medieval deer park, later given over to cultivation.

4.7 The park was completed by the 1770s, extending to the south of the Hall over 750 acres with a variety of buildings, lakes, cascades and bridges from which the landscape might be

² <https://historicengland.org.uk/listing/the-list/list-entry/1000114?section=official-list-entry>.

viewed. It was a celebrated regional attraction but declined in the early 19th century before new gardens and pleasure gardens were developed to the north of the Hall in the Victorian period. The early 20th century once again saw decline, before restoration in recent decades.

- 4.8 The registered area of the park comprises c.300ha, extending to the south of the village of Enville. It incorporates 11 listed buildings, where 10 are listed at Grade II, with The Museum (which was formerly a summerhouse and dated to c.1750) individually designated at the higher level of Grade II* (1278514).
- 4.9 The park is quite self-contained, with the key 18th century elements of the Hall and water features primarily intended to reference each other, within the context of the designed landscape. The park as a whole is encompassed by a number of woodland coverts and copses, including substantial planting on its southern margins, reflecting an intentionally enclosed landscape designed to be separated from the wider agricultural landscape which surrounded it, and in the process, create a sense of privacy and seclusion.
- 4.10 The site and the registered park are separated by nearly 900m of farmland, woodland and a ridge. There is no intervisibility between them, nor any historical connection between the park and the land at the site. As a result, it is considered that the site does not form a part of the setting of the registered park and makes no contribution to its significance.
- 4.11 It is considered that the character, key views and visitor experience of the registered park would remain unaltered if the site is brought forward and delivered for development. Hence, no loss of its significance is expected, and the site's development would not affect either the park or the listed buildings it contains.
- 4.12 Accordingly, this Grade II* registered park and garden does not present a constraint to the deliverability or capacity of the site in terms of development.

Grade I Listed Church of St Peter (NHLE Ref. 1230950³)

- 4.13 The Church of St Peter, Kinver, is designated as a Grade I listed building. The main body of the church, including the tower, is mainly early- to mid-14th century in date and incorporates some 12th century fragments of an earlier church. There are substantial mid-15th century extensions. It was restored in 1884/1885.
- 4.14 The church lies at the summit of a steep sided ridge, above and to the south of the historic core of Kinver, these attributes providing its setting and historic context.
- 4.15 The parish church is c.1.4km from the site, separated by the historic core of Kinver in between (focused on the curvilinear course of High Street running into Church Hill), as well as an extensive area of modern housing estates on its northern fringes.
- 4.16 The site is a distant element in the view from the northern edge of the churchyard and does not make a positive contribution to the church's setting or its significance.

³ <https://historicengland.org.uk/listing/the-list/list-entry/1230950?section=official-list-entry>.

- 4.17 The elements of the parish church's wider setting which contribute most to its significance are its relationships with (i) the enclosing churchyard, (ii) the historic settlement at the foot of the steep ridge on the north side and (iii) the wider parish beyond, in view of the fact that it would have formed the administrative and spiritual focus.
- 4.18 The relationships with the churchyard enclosure and settlement are readily experienced, and also appreciated from the asset and in views towards the asset, but there is somewhat less of an experience or appreciation of the church's historic and functional inter-relationships with the wider parish that it administered and supported. The site forms part of the general backcloth of agricultural land beyond the edge of the existing settlement and makes no specific contribution to the asset's setting and significance.
- 4.19 It is concluded to be highly unlikely that the development of the site would have any impact on its heritage significance and therefore, it is assessed that this asset does not have a particular bearing on the site's deliverability or capacity for development.

Kinver Camp Iron Age Hillfort Scheduled Monument (NHLE Ref. 1015432⁴)

- 4.20 This scheduled monument is positioned at the north-west corner and highest point of the Kinver escarpment, on the south-western outskirts of Kinver.
- 4.21 The monument includes the earthwork and buried remains of a univallate Iron Age fort. The hillfort's earthworks are sub-rectangular in plan and exhibit external dimensions of c.210m x 300m, thus enclosing an area of approximately 3.75ha.
- 4.22 In common with both of the preceding assets, the majority of the monument's significance is held in the physical form and fabric, and it's setting thus provides the minority portion. With this in mind, the hillfort's location on the northern edge of the Kinver escarpment makes a strong and positive contribution to its significance because it would not only have made it very defensible (closing off one line of attack from the north), but would also have been a widely visible landmark in the wider Iron Age landscape and a strategic location from which to exert a degree of control over that landscape.
- 4.23 There are (unsurprisingly) wide-ranging views outwards into the landscape from the hillfort, with these principally being the result of its topographic location and the distribution of trees and scrub around the edges of the escarpment. These views include a diverse landscape of fields and houses, taking in the built-up extents of Kinver in the immediate surroundings and extending as far east as the high-rise flats of the Black Country to the north-east. The site forms one very small element within this very extensive landscape setting.
- 4.24 The site lies c.1.1km north/north-east of the scheduled monument and forms a very small part of the wider agricultural backcloth to the settlement of Kinver in the foreground below this ridge. However, whilst the agricultural fields within the site are visible and recognisable in views outwards into the wider farming landscape beyond Kinver, these fields do not make a particular or noteworthy contribution to its setting and certainly no more of a contribution than any other agricultural fields around the village fringes.

⁴ <https://historicengland.org.uk/listing/the-list/list-entry/1015432?section=official-list-entry>.

- 4.25 Whilst the residential development of the site would represent a 'change' within the setting of the hillfort because it would extend the extent of built form outwards, north of the current focus of the settlement, it is nonetheless concluded that this is unlikely to generate a loss of its significance and therefore give rise to harm in that respect. This is based on the clear assessment that these fields do not make a specific or notable contribution to the significance of this heritage asset and the diverse arrangement of built form, fields and woodland forming its setting would remain.
- 4.26 Therefore, it is unlikely that the experience or appreciation of the scheduled monument would be lost or damaged in a way or to an extent that would generate a loss of significance and thus, it is concluded that this asset does not significantly constrain either the deliverability or the capacity of the site for development.

Kinver Conservation Area

- 4.27 The Kinver Conservation Area Management Plan (adopted 11 November 2011) sets out a mid-to long-term strategy in the form of a series of recommendations and guidelines. The extent and composition of the CA is set out in paragraph 2.1.1 of the document, as follows:

"The Conservation Area covers the historic High Street, with its shops, banks and other commercial premises; the green fields and woods which lie up steeply rising hills to the south west, forming Kinver Edge; Church Hill and the historic St. Peter's Church, visible on the crown of the hill from many vantage points in the conservation area; and, lastly, the sinuous curves of the River Stour and the adjoining Staffordshire and Worcestershire Canal, between which lie open fields and areas of woodland."

- 4.28 Paragraph 3.1.2 subsequently observes that:

"Despite mainly late 20th century housing, which lies in closely defined areas to the west, north and east of the conservation area, Kinver retains a village quality, which is reinforced by the rural setting and waterside location."

- 4.29 Paragraph 3.2.1 further adds that:

"Kinver is notable for the high sandstone ridge which forms the southern and western part of the conservation area, and which lies about 50 metres above the High Street. This forms a backdrop in views from the High Street and beyond, punctuated by the outline of St. Peter's Church on the skyline."

- 4.30 The CA presents the most significant heritage-based constraint to growth around the village because of its location, extent, integrity, coherence and setting. The gently falling, open agricultural landscape to the south of Church Hill makes a strong positive contribution to the special interest of the CA, illustrating and emphasising its rural origins and context, as well as representing a striking contrast with the prominent ridgeline sheltering the historic core of Kinver on the north side.

- 4.31 The mosaic of woodland and farmland west of Kinver and the rolling agricultural fields to the east also form key aspects of the setting of the CA and contribute to its special interest by maintaining the village's character as a historic rural settlement, and connecting it to its

wider agricultural hinterland, despite the substantial and extensive residential growth to the north during the 20th century.

- 4.32 The site is located c.550m to the north of the CA. They are separated by a mix of 20th century housing estates and the buildings and playing fields of Edgecliff High School, which stretch between the north side of Enville Road and the south-east side of Hyde Lane.
- 4.33 The two fields within the site boundary can be experienced from within the CA and therefore form part of its wider setting, but the spatial separation and intervening residential land use mean that the site makes little or no contribution to its special interest.
- 4.34 Given the importance afforded to the 'green' and open spaces **within** the CA, as set out by the Council's adopted Management Plan, it is obvious that future residential growth should be focused away from this designated heritage asset, in order to avoid or minimise harm to its character and appearance.
- 4.35 Given that the site represents only a very small part of the conservation area's setting and one which makes little or no contribution to its special interest, there is no reason to believe or expect that it could not come forward for development in a way that avoids or generates minimal harm to this extensive heritage asset.
- 4.36 As such, it is concluded that the Kinver Conservation Area does not represent a significant constraint to the deliverability of the site or in terms of its residential capacity.

Kinver Edge Rock Houses

- 4.37 This non-designated asset comprises a series of six houses cut into the cliffs at Holy Austin Rock (Staffordshire Historic Environment Record Ref. MST1158). These dwellings are of possible 17th century date, although it is recognised that the name may indicate they were occupied and functioned as a hermitage prior to the Reformation.
- 4.38 It is recorded that the rock-cut houses were used and inhabited as domestic dwellings until the mid-20th century. The core element of their setting is Kinver Edge, of which these houses are an integral part. The village below provides their broader context.
- 4.39 The Rock Houses and the site are separated by a distance of c.880m. As with the church, the site is to some extent discernible in views out, but it is an inconsequential aspect of the views, being part of a background that includes residential and commercial development, pockets of woodland and multiple agricultural fields, and does not make a positive contribution to the setting or significance of this asset, neither enhancing nor detracting from its experience or understanding.
- 4.40 By virtue of their position and elevation, the Kinver Edge Rock Houses are not a discernible feature of views south from within/across the site and there is no indication that the farmland at the site comprises an aspect of the asset's setting that makes a contribution to its significance. As a result, its proposed development is very unlikely to cause harm in that respect and so there is no indication or evidence that these non-designated heritage assets constrain the deliverability or capacity of the site for development.

South Staffordshire Historic Environment Assessment

- 4.41 The Historic Environment Assessment (HEA) divides South Staffordshire into 13 project areas and aims to establish the potential for the historic environment of each to absorb new development, and housing in particular. This has been carried out by dividing each of the project areas into 'Historic Environment Character Zones' (HECZs) and assessing the significance of the heritage assets of each zone.
- 4.42 The site falls within the Kinver (KV) project area, character area KVHECZ 7: Brindley's Heath and Gallowstree Elm (HEA, Appendix 4). The legible historic landscape of the character area stems from planned enclosure in the late 18th and the 19th centuries.
- 4.43 This established the regular field divisions and the local road network, the basic structure of which remains largely unchanged to the present day. Historic hedgerows still survive in places. The HEA notes that no Public Rights of Way (PRoW) exist within the character area, with the result that it can only be experienced from the lanes. In addition to the legible heritage resource, the HEA also notes the potential for unknown archaeology to be present, but then this is typically the case anywhere.
- 4.44 The HEA recommends the following for KVHECZ 7:
- "Should land within the zone be allocated... any proposed development should seek to complement the low settlement density and the regularity of the overall historic landscape historic landscape character. Any such development should also be designed to enhance the local distinctiveness and respect the local vernacular in terms of its scale and architectural form."*
- 4.45 The site occupies approximately 10% of the character area and development here would be within two discrete land parcels, created by historic enclosure. The HEA recommendations point towards the likely acceptability and appropriateness of development proposals in this location, but with certain considerations in terms of the approach to the masterplan, such as the retention and enhancement of the central east-west boundary feature and the outer boundaries, as well as attention to design issues.

5 CONCLUSION

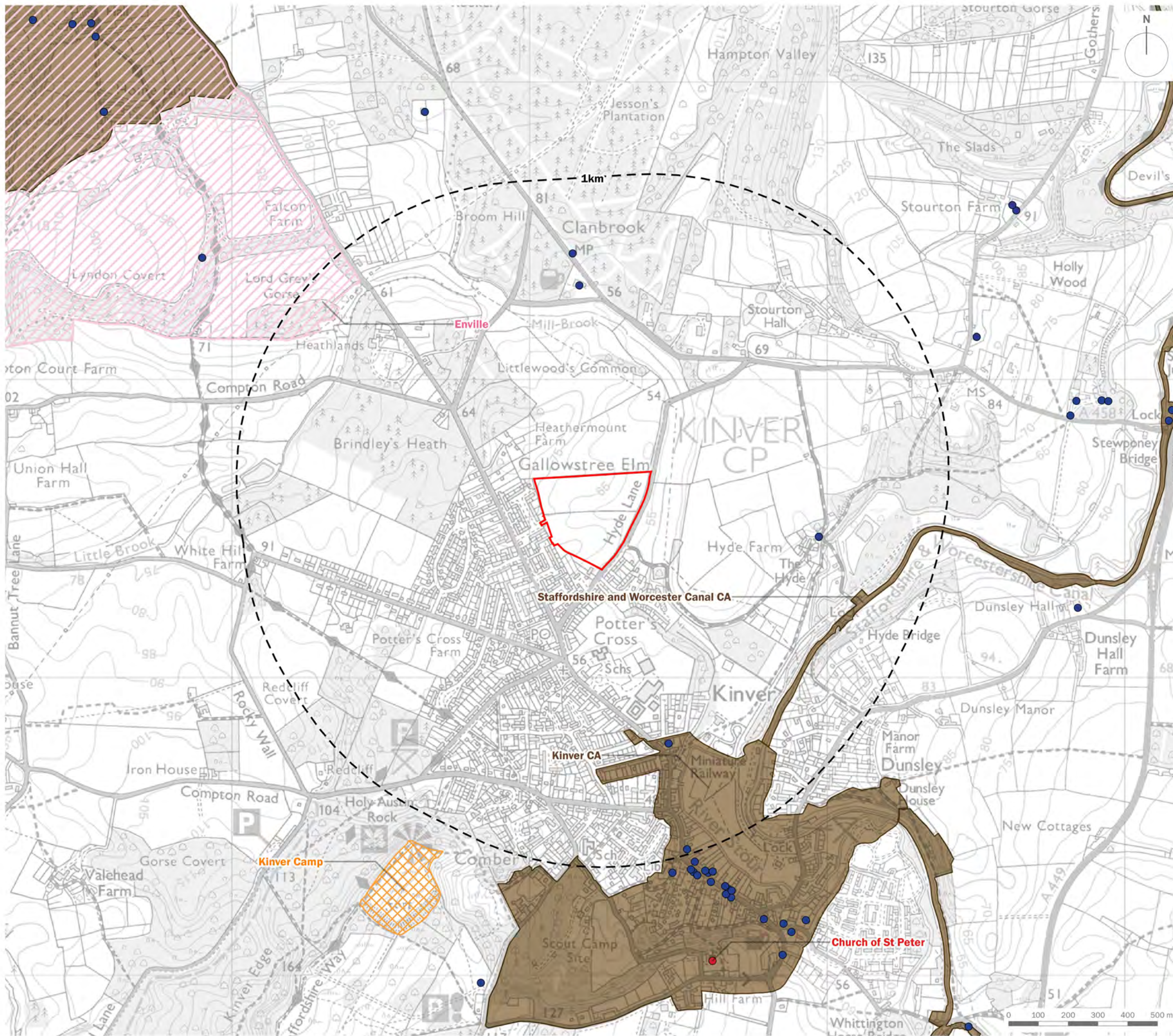
- 5.1 Based on the information above, the development of the site would not have a direct impact on a designated heritage asset and, equally, proposals for its residential development would not give rise to anything more than a minimal impact on such an asset because of changes within its setting.
- 5.2 The only designated heritage asset that could realistically experience a loss of significance because of changes within its wider setting is Kinver Conservation Area and even then, the expectation is that this could be avoided with sensitive masterplanning.
- 5.3 None of the other designated heritage assets are likely to be affected and it is also assessed that no non-designated assets are likely to be impacted by the site's development. There is also a low potential for the presence of hitherto unknown/unrecorded archaeological sites,

features, deposits and/or remains within the site footprint which would present a constraint to its deliverability and/or capacity for development.

- 5.4 Ultimately, it is concluded that the site could come forward and be developed with no more than a limited impact on the historic environment, either directly or indirectly, and could be delivered in accordance with current legislation and planning policy for its conservation and management. Given the absence of significant archaeological or heritage constraints, the site is considered to represent a suitable location for residential development.

Plans

Plan EDP 1: Heritage Context
(edp4711_d003b 22 May 2024 DJo/CJo)



- Site Boundary
- 1km Study Area
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Scheduled Monument
- Registered Park and Garden
- Conservation Area

client
Bellway Homes

project title
Land to the West of Hyde Lane, Kinver

drawing title
Heritage Context

date	22 MAY 2024	drawn by	DJo
drawing number	edp4711_d003b	checked	CJo
scale	1:12,500 @ A3	QA	RBa



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**Appendix 4: Land east of Dunsley Drive, Kinver –
Site Location Plan**



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CLIENT

Bellway Homes

PROJECT

Dunsley Drive, Kinver

DRAWING

Contract Plan

PROJECT NUMBER

BELQ3007

DRAWING NUMBER

10_02

CHECKED BY

NW

REVISION

02

STATUS

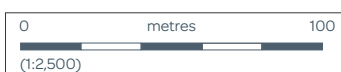
Final

DATE

June 2019

SCALE

1:2,500@ A4



**Appendix 5: Land east of Dunsley Drive, Kinver –
Evidence Base documents
(Heritage, Landscape, Drainage,
Ecology and Highways)**

Update Ecological Walkover Report

Dunsley Drive, Kinver. May 2024

This briefing note has been prepared by CSA Environmental on behalf of Bellway Homes in relation to Dunsley Drive, Kinver (hereafter referred to as 'the Site').

1.0 Introduction

- 1.1 This report provides an update review of ecological constraints and opportunities at Dunsley Drive, Kinver, which is due to be promoted through the emerging South Staffordshire Local Plan. This review is informed by an update site walkover undertaken in May 2024.
- 1.2 The scope of this report has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management¹, and to the *Biodiversity: Code of practice for planning and development* (BS 42020:2013)².

2.0 Background

- 2.1 An initial Preliminary Ecological Appraisal was completed at the Site in November 2021, comprising a desk study and field visit. At the time of the survey, the Site comprised horse-grazed pasture with a stable buildings in the north. Vegetated boundaries were limited to short stretches of native hedgerow along the southern and western boundary, and small tree groups behind the stable buildings.
- 2.2 Due to the lack of intact vegetated features, and managed short-sward grassland, no further protected species surveys were recommended. Due to the presence of nesting birds, a pre-commencement check of the stable blocks for nesting was recommended, as well as necessary habitat condition assessments to inform a Biodiversity Net Gain (BNG) Metric.

¹ Chartered Institute of Ecology and Environmental Management, 2017. *Guidelines for Ecological Report Writing*. Winchester: CIEEM.

² British Standards Institution, 2013. *BS 42020:2013 Biodiversity — Code of practice for planning and development*. London: BSI.

3.0 Methods

Desk Study

- 3.1 A full update data search is outside the scope of this report. Updates in relevant ecological guidance have been reviewed and considered as part of this update.

Field Visit

- 3.2 An update site visit was completed by Alex Perry ACIEEM on 13 May 2024 to review any change in Site conditions since the previous ecological survey work was completed. The survey was undertaken during cloudy and dry conditions.
- 3.3 At the time of the 2021 PEA, the industry standard for habitat mapping and classification was Phase 1. Since then, UK Habitat Classification (UKHab) has been adopted as the industry standard for habitat mapping and this allows easier alignment with Biodiversity Net Gain metrics. The update survey reclassified habitats into UKHab. The Habitats Plan has been revised and is provided in Appendix A.
- 3.4 Photographs of the Site are included in Appendix B.

Limitations

- 3.5 There were no limitations to the survey, which was undertaken in good conditions at an optimal time for flora identification.

4.0 Results

- 4.1 The Site conditions were consistent with those previously assessed within the Preliminary Ecological Appraisal (PEA). Two horses were currently present within the grassland fields at the time of survey. For the purposes of this report, an update of habitats in line with UKHab have been provided below.

Other Neutral Grassland (g3c)

- 4.2 The Site is dominated by short grazed other neutral grassland. At the time of the field survey, two horses were present within the field. Post and wire fencing divides the field into various sized paddocks but the floral diversity was found to be consistent throughout. Gates between each of paddocks were open, allowing the horses to graze all areas of the Site.
- 4.3 A number of species typical of this habitat were recorded, including false oat-grass *Arrhenatherum elatius*, cock's-foot *Dactylis glomerata*, perennial rye-grass *Lolium perenne*, soft brome *Bromus hordeaceus*, sweet vernal grass *Anthoxanthum odoratum*, cat's-ear *Hypochaeris radicata*, nettle *Urtica dioica*, meadow buttercup *Ranunculus acris*, white dead nettle *Lamium album*, red clover *Trifolium pratense*, common sorrel *Rumex acetosa*, common vetch *Vicia sativa*, daffodil

Narcissus pseudonarcissus, daisy *Bellis perennis*, broad-leaved dock *Rumex obtusifolius*, forget-me-not *Myosotis* sp., cow parsley *Anthriscus sylvestris*, smooth sow thistle *Sonchus oleraceus*, yarrow *Achillea millefolium*, cleavers *Galium aparine*, dove's-foot cranesbill *Geranium molle*, ragwort *Jacobaea vulgaris*, ribwort plantain *Plantago lanceolata*, greater plantain *Plantago major*, creeping buttercup *Ranunculus repens*, chickweed *Stellaria media*, dandelion *Taraxacum officinale* agg., white clover *Trifolium repens*, Germander speedwell, *Veronica chamaedrys* and periwinkle *Vinca* sp.

Native Hedgerows (h2)

- 4.4 Hedgerows at the Site comprise mostly short stretches of defunct, native vegetation. There is very little vegetation bounding the Site on the eastern boundary, with the western boundary partially bounded by outgrown hedgerows.
- 4.5 Boundary B1 lies adjacent to Dunsley Drive and supports short stretches of vegetation and semi-mature trees in places. Species recorded along this boundary include field maple *Acer campestre*, goat willow *Salix caprea*, sycamore *Acer pseudoplatanus*, silver birch *Betula pendula*, hawthorn *Crataegus monogyna*, holly *Ilex aquifolium*, blackthorn *Prunus spinosa*, *Prunus* sp., oak *Quercus robur*, bramble *Rubus fruticosus* agg, elder *Sambucus nigra*, snowberry *Symphoricarpos albus*, barberry *Berberis* sp. and elm *Ulmus* sp.
- 4.6 Boundary B2 comprises a short stretch of snowberry with small patches of bramble and hawthorn planted as part of an ornamental garden hedge for the dwelling to the south. A semi-mature silver birch tree (c. 8m tall) is located at the easternmost end of the boundary.
- 4.7 The eastern boundary (Boundary B3) comprises a double post and wire fenceline and supports very little vegetation. Small, isolated stands of hawthorn and holly are present along the boundary.
- 4.8 Boundary B4 lies adjacent to a residential garden to the north. A managed ornamental laurel *Laurus* sp. hedge is present in the north-eastern corner. A small off-site tree group is also present in the north-western corner and contains bramble, hawthorn, *Cupressus* sp. and silver birch.
- 4.9 A small tree group comprising yew *Taxus baccata*, elder *Sambucus nigra* and holly is present centrally along Boundary B4.

Bramble Scrub (h3d)

- 4.10 A short stretch of scattered bramble scrub is present along Boundary B1 and has begun to colonise into the field through lack of management, with dense bramble scrub also present along this boundary.

Buildings (u1b)

4.11 A small corrugated-metal stable (S1) is located in the north of the Site; it has three stable doors on the southern side, and is in use by the on-site horses. The inside of the building is lined with plywood; gaps in the roof and along the top of the plywood are extremely cobwebbed. The building continues to support negligible potential for roosting bats, however it offers potential bird nesting habitat.

5.0 Discussion and Recommendations

5.1 With reference to the 2021 PEA report there have been no significant changes to the Site conditions in terms of habitat value, and the grassland continues to be closely grazed, offering limited opportunities for protected species.

5.2 An added consideration comprises the need for bat survey work. Updated bat survey guidance was issued by the Bat Conservation Trust³ in September 2023 and based on updated definitions of on-site habitat suitability, the Site is considered to support 'low' suitability habitat for foraging and dispersing bats. In line with this recommendation, further survey work comprising seasonal walked transects and static monitoring are required to inform any scheme design.

5.3 A Habitat Condition Assessment was undertaken in July 2022, and this should be updated in the optimal season to align with the latest metric and condition assessment guidance (DEFRA's Statutory Metric at the time of writing).

6.0 Summary

6.1 The Site is dominated by closely grazed grassland, which as a habitat supports limited opportunities for protected species. Boundary vegetation, although largely defunct, offers suitability for foraging and dispersing bats, as well as habitat opportunities for other wildlife such as nesting generalist bird species.

6.2 Development proposals should seek to retain and enhance boundary vegetation, and buffer them so far as possible from development edge-effects such as artificial lighting.

6.3 The relevant provisions of the Environment Act 2021 mandate a requirement for development to deliver a minimum 10% Biodiversity Net Gain. Based on preliminary calculations it is anticipated that a 10% net gain in biodiversity can be achieved.

³ Collins, J (ed.) (2023) Bat Surveys for Professional Ecologist: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London

6.4 In addition to retention and enhancement of on-site habitats, development of the Site presents an opportunity to secure a range of ecological enhancements, such as:

- Drainage attenuation features, if appropriately designed, could serve a dual function as wildlife ponds, or dedicated wildlife ponds could be created within public open space. This would be beneficial to a wide variety of wildlife. Such features should be positioned within strategic green infrastructure corridors with good connectivity to the wider landscape.
- It has been recommended that boundary tree lines and hedgerows be retained and buffered from development edge-effects using public open space. The establishment of new habitats, such as species-rich grassland and additional tree planting, would enhance the biodiversity value of these habitat corridors.
- There are opportunities for delivery of new intact green corridors around the periphery to enhance connectivity into the wider area and opportunities for dispersing wildlife.
- Provision of new bat roosting opportunities. Bat boxes may be erected on new builds. These should be a purpose-built, durable and long-lasting variety such as available from Schwegler or Habibat, and should be incorporated into the fabric of new builds.
- Provision of new bird nesting opportunities. Bird nesting boxes may similarly be provided to benefit generalist bird species.
- Although not strictly an 'enhancement' measure, provision of hedgehog-friendly gravel boards or equivalent, providing a minimum 5 x 5-inch gap in garden fences, should be used to maintain permeability for hedgehogs across the Site.
- Log piles in peripheral areas of open space would be beneficial to species such as hedgehog, reptiles, great crested newt and invertebrates.

7.0 Conclusion

7.1 No significant ecological constraints to the principle of development at the Site have been identified. Further surveys for dispersing and foraging bats are recommended, however, the findings of these surveys are unlikely to identify significant constraints to the principle of development; rather, they will aid the formulation of targeted and effective mitigation and enhancement strategies.

Appendix A
Habitats Plan



- Site boundary
- Other neutral grassland (g3c)
- Bramble scrub (h3d)
- Sparsely vegetated land (s)
- Buildings (u1b5)
- Native tree group
- Native hedgerow (h2)
- Fence
- Individual tree (Indicative location)
- Structure reference
- Boundary reference
- Target note
TN1: Horsebox storage area



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Project	Land at Dunsley Drive, Kniver	Date	May 2024	Drawing No.	CSA/5849/102
Drawing Title	Habitats Plan	Scale	Refer to scale	Rev	-
Client	Bellway Homes	Drawn	BK	Checked	AP

Appendix B

Photosheet



Photograph 1. Boundary B1.



Photograph 2. Boundary B2.



Photograph 3. Boundary B3.



Photograph 4. View of the Site, looking south-west



Photograph 5. View of on-site structure, looking north



Photograph 6. View of the Site, looking east

Technical Note

Project: Land at Dunsley Drive, Kinver

Subject: Access Appraisal

Client:	Bellway Homes Limited	Version:	E
Project No:	06024	Author:	DB/SC
Date:	20/05/2024	Approved:	CS

I Introduction

I.1 Overview

- 1.1.1 PJA has been commissioned by Bellway Homes Limited to prepare a Transport and Access Appraisal to assess the potential residential development of land off Dunsley Drive, Kinver.
- 1.1.2 This note provides a review of the site's accessibility and identifies an access strategy.

I.2 Purpose of Report

- 1.2.1 The remainder of this document is structured as follows:
- Section 2 outlines the existing transport conditions;
 - Section 3 details the proposed access strategy;
 - Section 4 sets out the travel demand; and
 - Section 5 summarises the key findings from the note.

I.3 Proposed Development

- 1.3.1 As noted above, the potential of the site for residential development has been considered. It is estimated that the site could accommodate approximately 35 dwellings and therefore the assessment in this Technical Note has been based on this quantum.

2 Baseline Conditions

2.1 Site Location

2.1.1 The site is located on the north-eastern edge of Kinver. It is bound by Dunsley Drive to the west, residential properties to the north and south and open fields to the east. The site location is presented in Figure 1.

Figure 1: Site Location



2.2 Local Highway Network

Dunsley Drive

2.2.1 Dunsley Drive is a quiet residential cul-de-sac, which measures 5.5m in width in the vicinity of the site and is subject to a 30mph speed limit. In the vicinity of the site, Dunsley Drive is unmarked, with a footway on the western side of the carriageway measuring 2m in width.

2.2.2 Dunsley Drive meets Dunsley Road via a simple priority junction, approximately 50m to the north of the site boundary.

Dunsley Road

2.2.3 Dunsley Road is a single-carriageway road which measures 7.8m in width. In the vicinity of the junction with Dunsley Drive, Dunsley Road is subject to national speed limit (60mph), which reduces to 30mph approximately 40m to the west of the Dunsley Drive / Dunsley Road junction.

2.2.4 There is a footway on the northern side of the carriageway measuring circa 1m in width, separated from the carriageway by a steep grass verge.

2.2.5 Dunsley Road runs from a priority junction with the A49 north-east of the site, to a priority junction with High Street and Church Hill in Kinver, to the south-west of the site.

2.3 Pedestrian and Cycle Infrastructure

Pedestrian Infrastructure

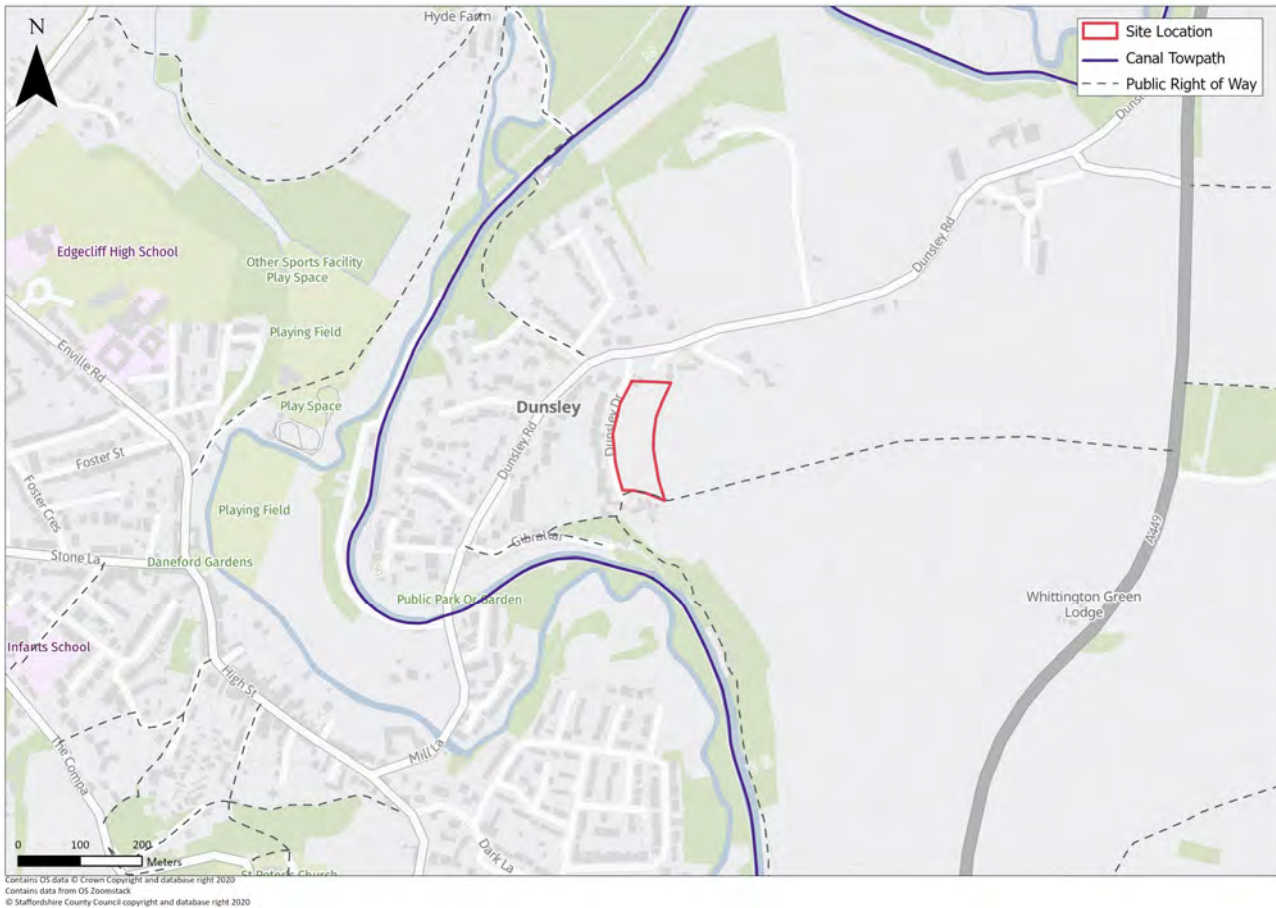
2.3.1 There is a footway on the western side of Dunsley Drive, which measures 2m in width. However, at present, this footway ends at the junction with Dunsley Road meaning there is no connection to the existing infrastructure on the northern side of the Dunsley Road carriageway. There is an unsurfaced footpath which connects Dunsley Drive to the southbound bus stop, east of the junction with Dunsley Road.

2.3.2 The footway on the northern side of Dunsley Road continues south-west, providing access to the northbound bus stop and to Kinver village centre. Alternatively, there is an unsurfaced public right of way which connects the southern end of Dunsley Drive to Dunsley Road in the vicinity of the Lockside Drive junction (Figure 2).

Cycling Infrastructure

2.3.3 There is no dedicated cycling infrastructure in the vicinity of the site. To the south of the site, the Staffordshire Canal towpath is suitable for cyclists (Figure 2). This route can be accessed by cycling 550m south on Dunsley Road and provides access to Kidderminster to the south via the River Stour.

Figure 2: Pedestrian and Cycle Infrastructure



2.4 Public Transport

Bus

2.4.1 The closest bus stops to the site are located on Dunsley Road. The stop for southbound services is located approximately 100m (one minute) walking distance from the site to the east of the Dunsley Road / Dunsley Drive junction. The stop for northbound services is located approximately 150m (two minutes) walking distance from the site, adjacent to the Dunsley Road / Hampton Grove junction.

2.4.2 The bus services accessible from these stops are summarised in Table 1.

Table 1: Bus Services

Service No.	Operator	Route	Weekday Hours of Operation	Weekday Frequency	Days of Operation
242	Select Bus Services	Potters Cross – Kinver – Dunsley – Stourton – Wollaston – Stourbridge	07:16-18:16	1 per hour	Monday - Saturday

2.4.3 Table 1 demonstrates that the 242 bus provides a regular service to key destinations such as Kinver and Stourbridge, accessible from within a short walking distance of the site.

Rail

2.4.4 The closest railway station to the site is Stourbridge Junction, which is located 8km to the east of the site. The station benefits from 819 car parking spaces. Car parking at the station is available free of charge.

2.4.5 Stourbridge Junction is situated on the Birmingham to Worcester via Kidderminster Line which is served by West Midlands Railway trains. This station can be accessed by the 242 bus from Dunsley Road, a journey time of approximately 21 minutes. Alternatively, the station can be accessed via an approximate 15 minute car or taxi journey.

2.4.6 The station offers services to Birmingham Snow Hill (at least every 20 minutes), Kidderminster (at least every 20 minutes) as well as Whitlock's End, Dorridge, Stratford-upon-Avon and Leamington Spa.

2.5 Accessibility

2.5.1 Guidance provided by the Institute of Highways and Transportation (IHT) in their publication 'Guidelines for Providing for Journeys on Foot' (2000) suggests that in terms of commuting, walking to school and recreational journeys; walk distances of up to 2,000m can be considered as a preferred maximum, with 'desirable' and 'acceptable' distances being 500m and 1,000m respectively. It should, however, be noted that journeys of a longer length are often undertaken.

2.5.2 For non-commuter journeys, the Guidance suggests that walk distances of up to 1,200m can be considered as a preferred maximum, with the 'desirable' and 'acceptable' distances being 400 and 800m respectively. Again, it should be noted that journeys of a longer length are often undertaken.

2.5.3 Assuming a typical walking speed of approximately 1.4m/s, Table 2 summarises the broad walk journey times that can fall under each category.

Table 2: IHT Walking Standards

IHT Standard	Distance		Walk Time	
	Commuting and Walking to School	Other non-commuter journeys	Commuting and Walking to School	Other, non-commuter journeys
Desirable	500	400	6	5
Acceptable	1,000	800	12	10
Preferred Maximum	2,000	1,200	24	14

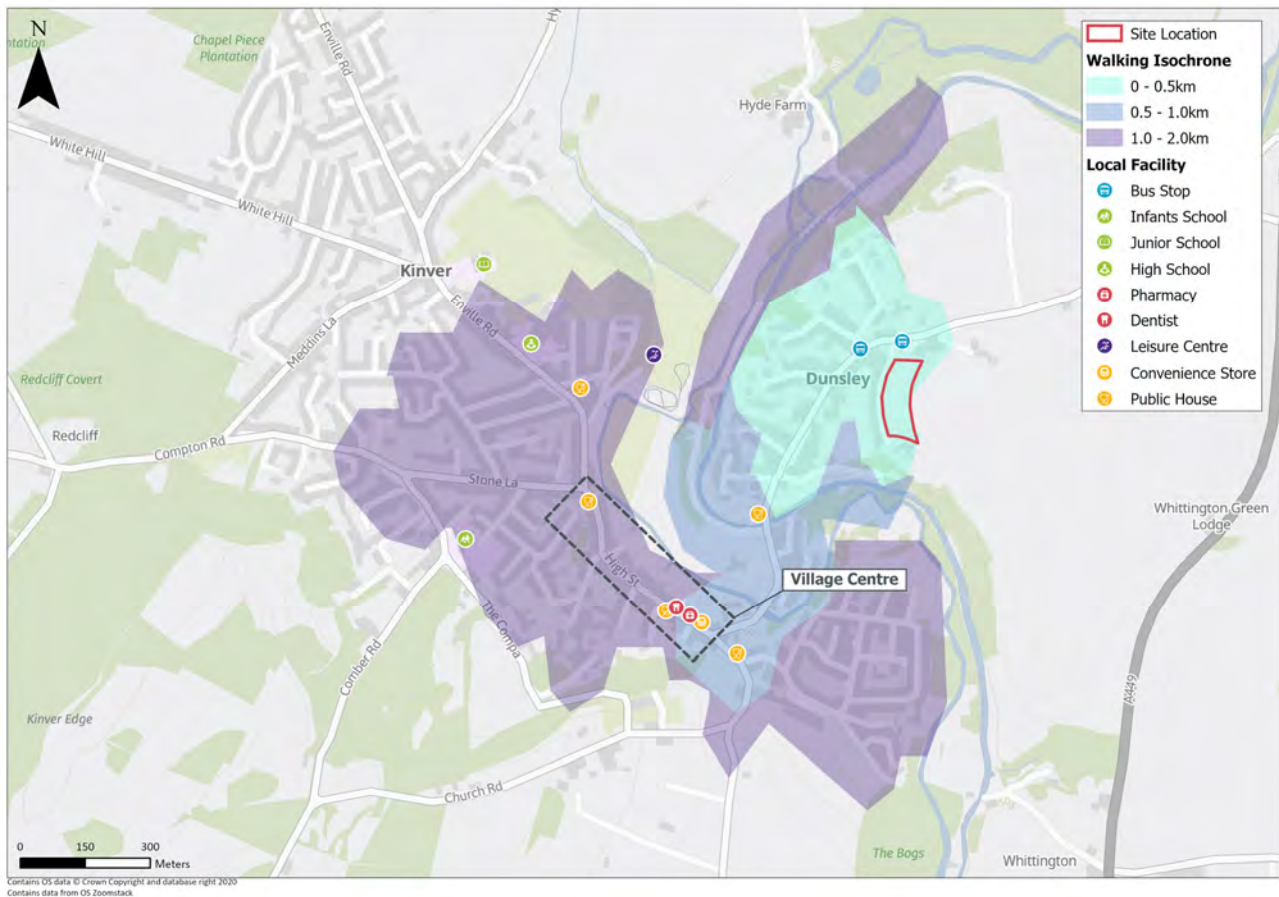
2.5.4 Local amenities within walking distance of the site are presented in Table 3. Distances are measured from the western boundary of the site, from which an access could be provided.

Table 3: Local Amenity Accessibility

Local Facility	Location	Distance from Site Access (m)	Walking Time (Minutes)	Within IHT Standard
The Vine Inn (Public House)	Dunsley Road	600	6	Acceptable
The Cross Inn (Public House)	Church Hill	1100m	12	Preferred Maximum
Kinver High Street	High Street	1200m	13	Preferred Maximum
Co-op Food (Convenience Store)	High Street	1200m	13	Preferred Maximum
Kinver Post Office	High Street	1200m	13	Preferred Maximum
Bills Pharmacy	High Street	1200m	14	Preferred Maximum
White Harte (Public House)	High Street	1200m	14	Preferred Maximum
Kinver Village Dental Practice	High Street	1200m	14	Preferred Maximum
Foley Infant Academy	Fairfield Drive	1800m	21	Preferred Maximum
Kinver High School	Enville Road	1800m	22	Preferred Maximum
Kinver Dental Surgery	Enville Road	1800m	22	Preferred Maximum
The Edward Marsh Centre (Community Centre)	Sterrymere Gardens	1800m	22	-
Brindley Heath Junior School	Enville Road	2000m	25	Preferred Maximum

2.5.5 Figure 3 shows the location of each amenity in relation to the site.

Figure 3: Local Amenities



2.5.6 Figure 3 demonstrates that there are several amenities accessible within walking distance of the site. This includes Kinver village centre, which provides numerous shops, eateries and medical facilities.

2.6 Highway Safety

2.6.1 In order to establish whether there are any safety concerns on the local highway network that might be exacerbated by the development of the site, publicly available collision records have been obtained from the crashmap.co.uk website for the most recent five-year period (2018-2022). Consideration has been given to junctions with Dunsley Road, between the A449 and High Street.

2.6.2 The recorded collisions are presented in Figure 4.

Figure 4: Collision Data



- 2.6.3 Just one collision has been recorded within the most recent five-year period, classed as slight in severity.
- 2.6.4 The collision was located at the junction between Dunsley Road and Dunsley Drive, which involved one vehicle. Within the study area as a whole, there have been no collisions involving pedestrians or cyclists.
- 2.6.5 Therefore, based on the information provided above, it is concluded that there are no existing highway safety issues which would be exacerbated by the residential development of the site.

3 Access Strategy

3.1 Overview

- 3.1.1 Access to the site can be provided via Dunsley Drive. The junction would be positioned approximately 60m south of the junction with Dunsley Road.

3.1.2 A 3D access design has been prepared for two access options, which are included in **Appendix A and B** respectively. Both options have been designed in accordance with the Staffordshire Residential Design Guide (2000).

Option 1

3.1.3 Option 1 comprises a 5.0m wide priority junction from Dunsley Drive with 10m kerb radii. At the junction, a footway is provided on the northern side of the carriageway, measuring 1.8m width. Along the main spine road within the site, footways measuring 1.8m in width are provided on both sides of the carriageway. At the mouth of the access junction, a dropped kerb crossing with tactile paving is provided to accommodate north to south pedestrian movements.

3.1.4 Within the site, a second priority junction from the main spine road will be provided to provide access to the plots in the northern section of the site. This would also measure 5.0m in width, with 6m kerb radii. Footways measuring 1.8m in width are provided on either side of the carriageway.

3.1.5 A drawing is provided in **Appendix A**.

Option 2

3.1.6 In Option 2, the priority at the site access junction has been reversed to give priority to vehicles accessing the site. As per Option 1, a 5.0m access road is provided with a 1.8m footway on the northern side of the carriageway. Within the site, 1.8m footways are provided on both sides of the carriageway.

3.1.7 As per Option 1 a secondary priority junction is provided from the spine road within the site, measuring 5.0m in width with 6m kerb radii. Again, footways of 1.8m are provided on either side of the carriageway.

3.1.8 A drawing is provided in **Appendix B**.

Swept Path Analysis

3.1.9 Swept Path Analysis drawings have been prepared for both access options, showing the movements of a 10.2m refuse vehicle, 5.08m large car and 7.2m van. These are included in the drawings in **Appendix A** and **Appendix B**. The swept path analysis demonstrates that each vehicle can manoeuvre into and out of the site.

3.2 Pedestrian Infrastructure

3.2.1 An uncontrolled pedestrian crossing with dropped kerbs and tactile paving would be provided just north of the proposed site access, to connect the footway on the northern side of the carriageway to the existing provision on the western side of Dunsley Drive.

3.2.2 As previously described, the existing footway on Dunsley Drive does not extend further than the junction with Dunsley Road. Therefore, a new 2m wide footway connection will be provided from Dunsley Drive, extending west. Opposite the junction with Hampton Grove, an uncontrolled pedestrian crossing with dropped kerbs and tactile paving would be provided to connect the proposed footway with the bus stop and existing footway provision on the northern side of Dunsley Road. To accommodate this, the bank on the southern side of Dunsley Road would need to be re-graded.

4 Travel Demand

4.1 Introduction

4.1.1 This section provides a summary of the travel demand calculations that have been used to determine the impact of the development proposals.

4.2 Trip Generation

4.2.1 The vehicular trip generation for the proposed residential site has been derived from the TRICS database. The following criteria has been used:

- Land Use 03/A – Houses privately owned;
- Great Britain (excluding sites within Greater London and Irish planning regions);
- Sites within an ‘Edge of Town’ location and
- Sites comprising 10 – 50 dwellings
- Removing sites surveyed during Covid-19 restrictions and any sites including flats.

4.2.2 As previously noted, it is estimated that approximately 35 dwellings could be accommodated on the site.

4.2.3 The resultant trip generation for 35 dwellings is presented in Table 4. Full TRICS output reports are provided within **Appendix C**.

Table 4: Trip Generation

	AM Peak (08:00 – 09:00)			PM Peak (15:00 – 16:00)		
	Arrive	Depart	Two-Way	Arrive	Depart	Two-Way
Trip Rate (per dwelling)	0.157	0.349	0.506	0.331	0.172	0.503
Trip Generation (35 dwellings)	5	12	18	12	6	18

4.2.4 Table 4 demonstrates that the proposed development would generate a total of 18 two-way trips during the AM and PM peaks. This is equivalent to fewer than one trip every three minutes.

4.3 Trip Distribution

4.3.1 Census 2011 Journey to Work data for the South Staffordshire 014 MSOA has been used to estimate vehicular trip distribution. ArcGIS has been used as a tool to assign trips to the local highway network. This shows that 92% leaving the site via Dunsley Drive turn right and travel east on Dunsley Road and 8% of trips turn left and travel west on Dunsley Road.

4.4 Highway Impact

4.4.1 Based on the above, there will be an impact of no more than 18 two-way trips at any junction beyond the Dunsley Drive / Dunsley Road junction. This equates to an increase of just one trip every 3-4 minutes, which would be imperceptible from day-to-day fluctuations in traffic levels.

4.4.2 The residential development of the site would therefore not have a severe impact on the highway network, and no junction capacity assessments would be required as part of any planning application.

5 Summary

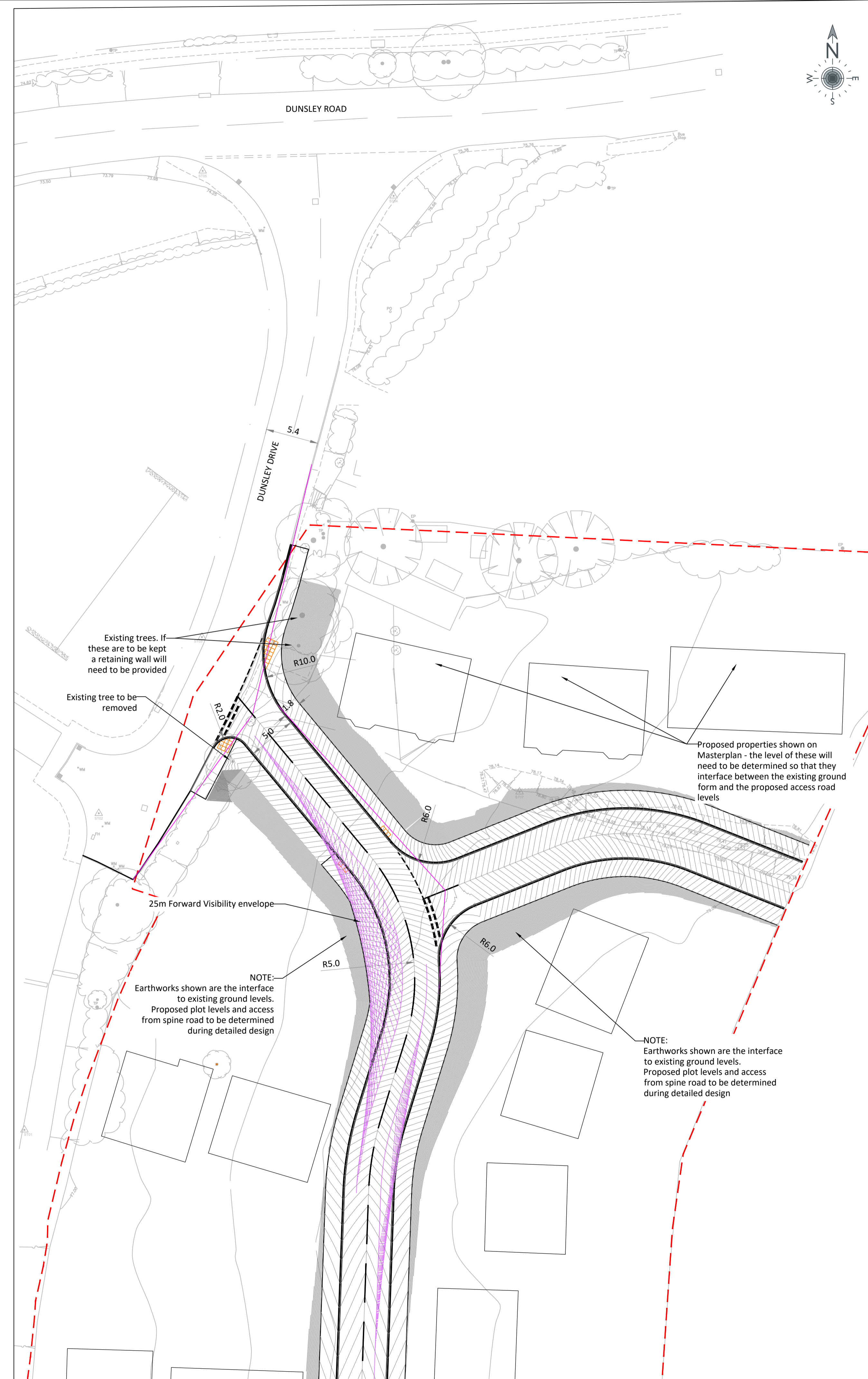
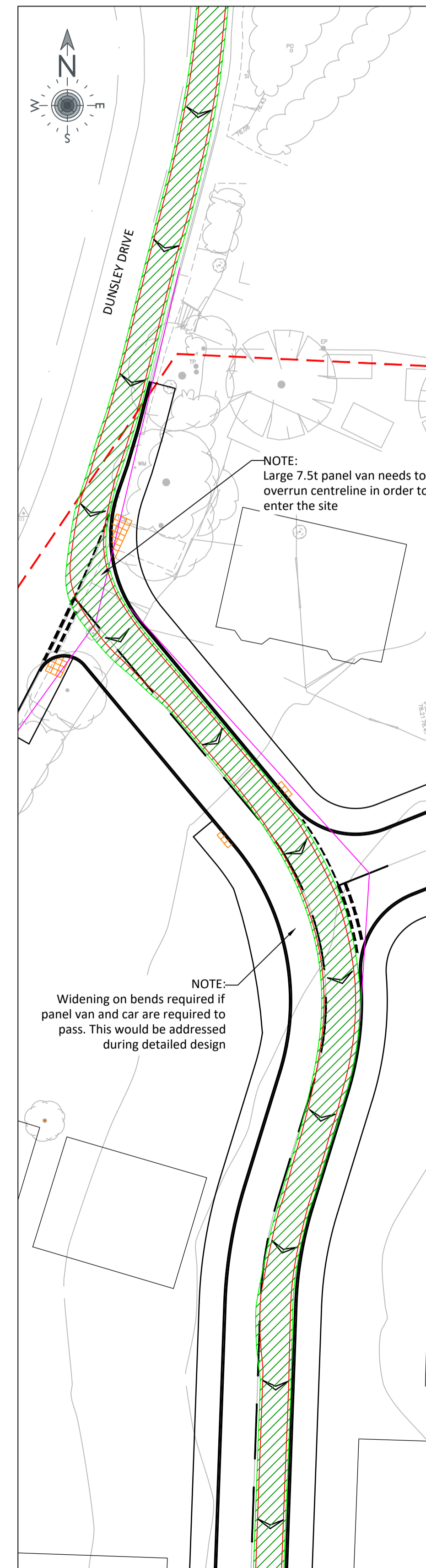
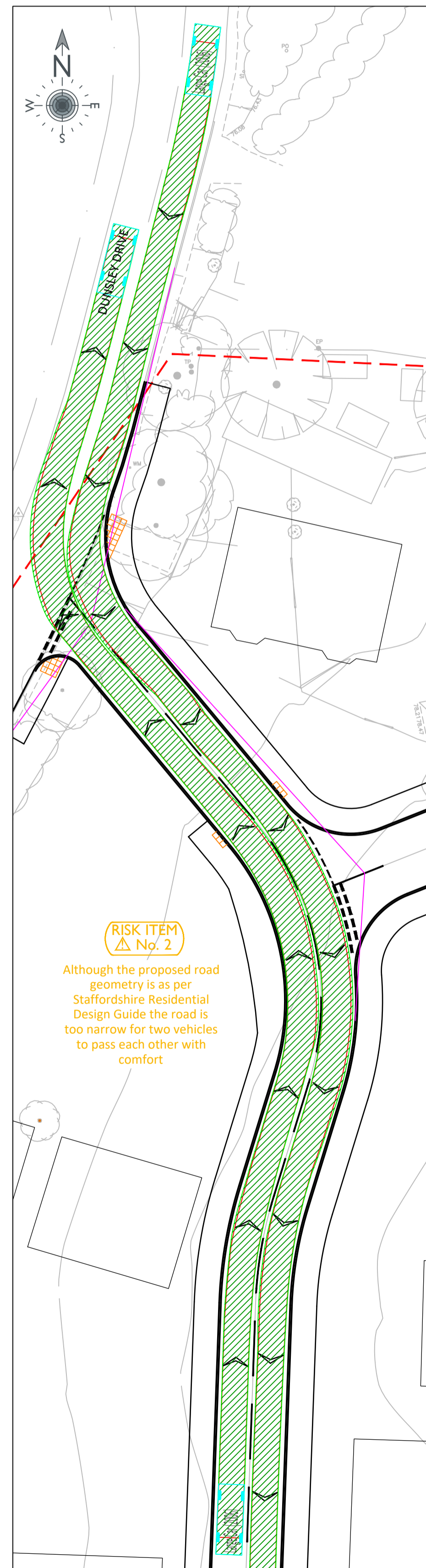
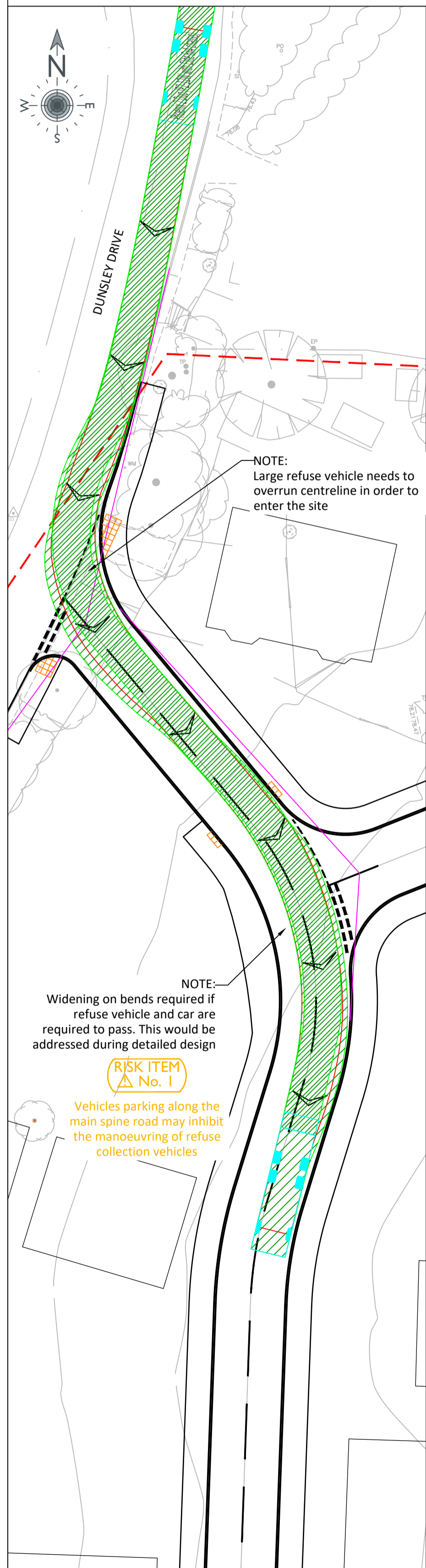
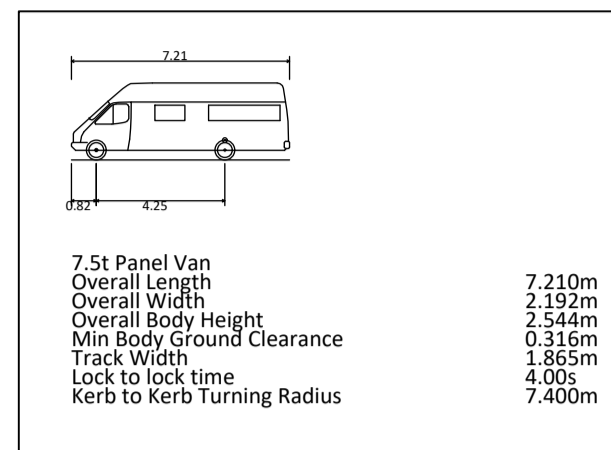
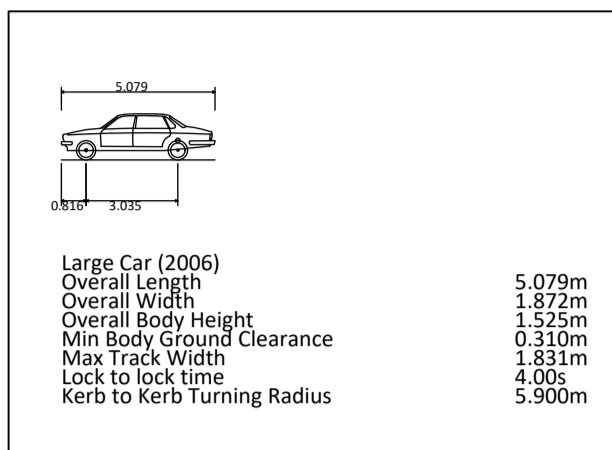
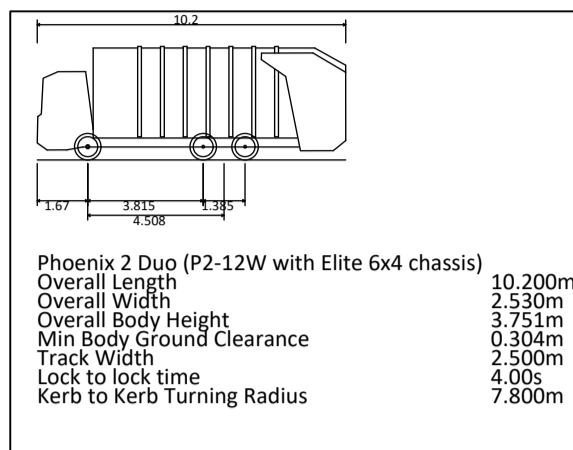
5.1.1 This technical note sets out the transport considerations and suitability of access for a potential residential development on land off Dunsley Drive, Kinver and demonstrates the following:

- The site is accessible via sustainable modes of transport and there are a variety of amenities within IHT guidelines for walking distances;
- A safe and suitable means of access can be achieved via Dunsley Drive;
- A footway will be provided on the northern side of the access road, with a new pedestrian crossing on Dunsley Drive to connect into the existing provision. A new footway can also be provided along Dunsley Road, connecting the site to the existing provision on Dunsley Road;

- The trip generation has been estimated based on 35 dwellings being developed on the site. It is forecast that the site would generate a total of 18 two-way trips during the AM and PM peaks, equating to approximately one trip every 3-4 minutes; and
- The traffic generated by the development would result in an imperceptible increase in vehicular trips and would therefore not constitute a severe impact on the local highway network.



Appendix A Site Access Drawing – Option I



NOTES

These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

- KEY**
- Proposed Contour 50mm Interval
 - Junction Visibility Splay (2.4m x 25m)
 - Forward Visibility Splay (25m)
 - Approximate Site Boundary

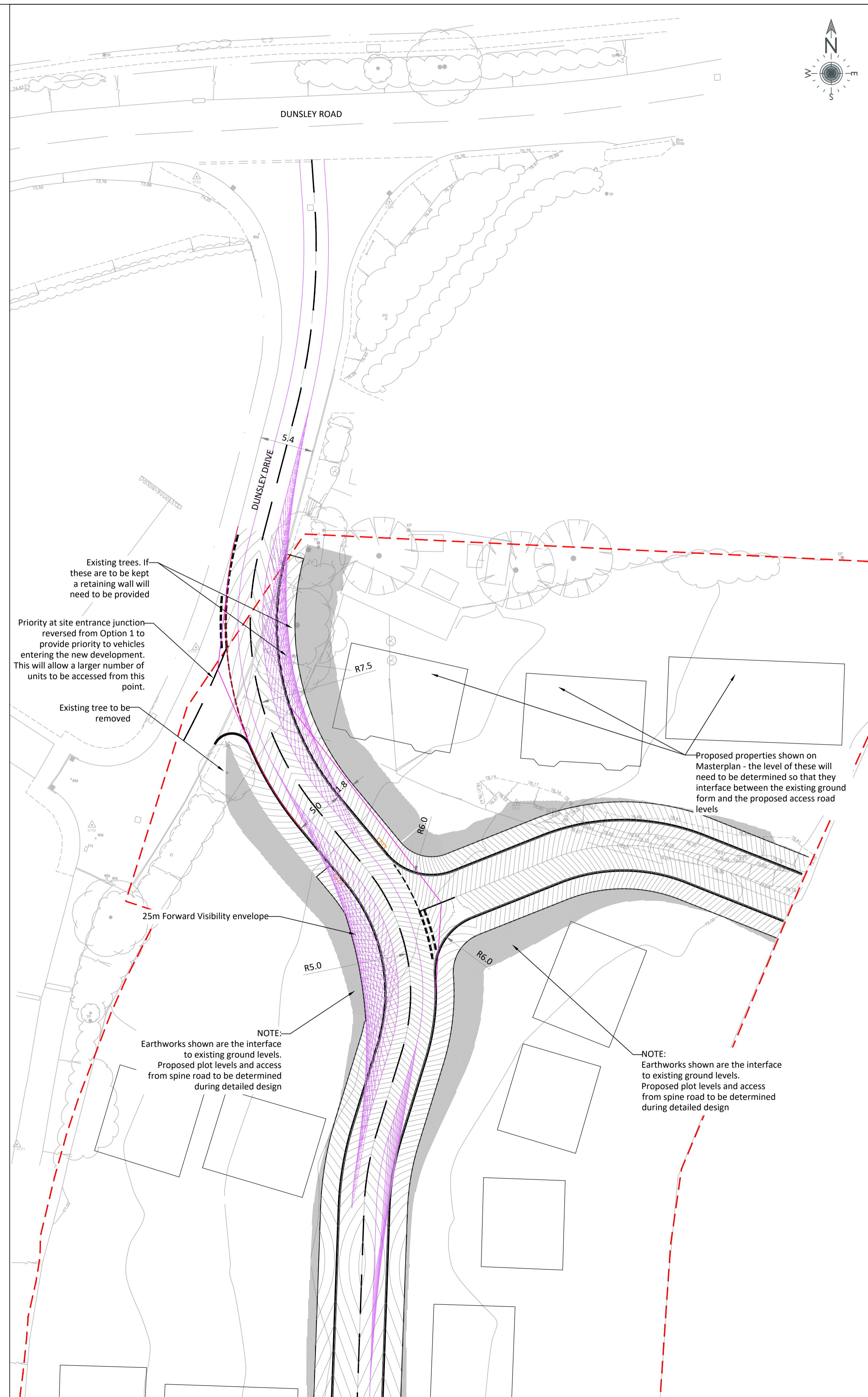
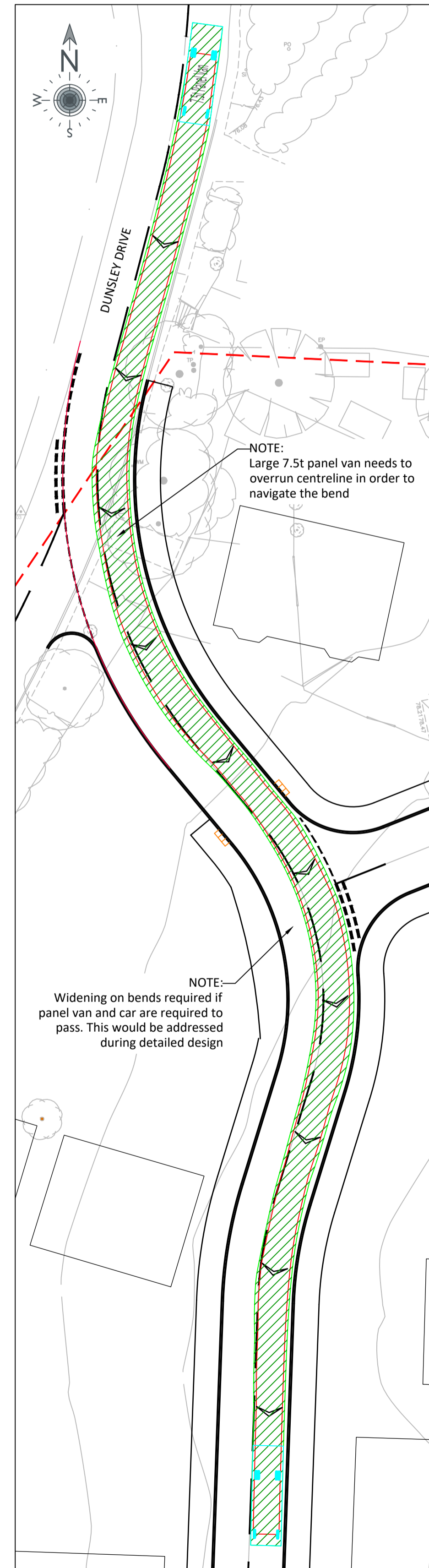
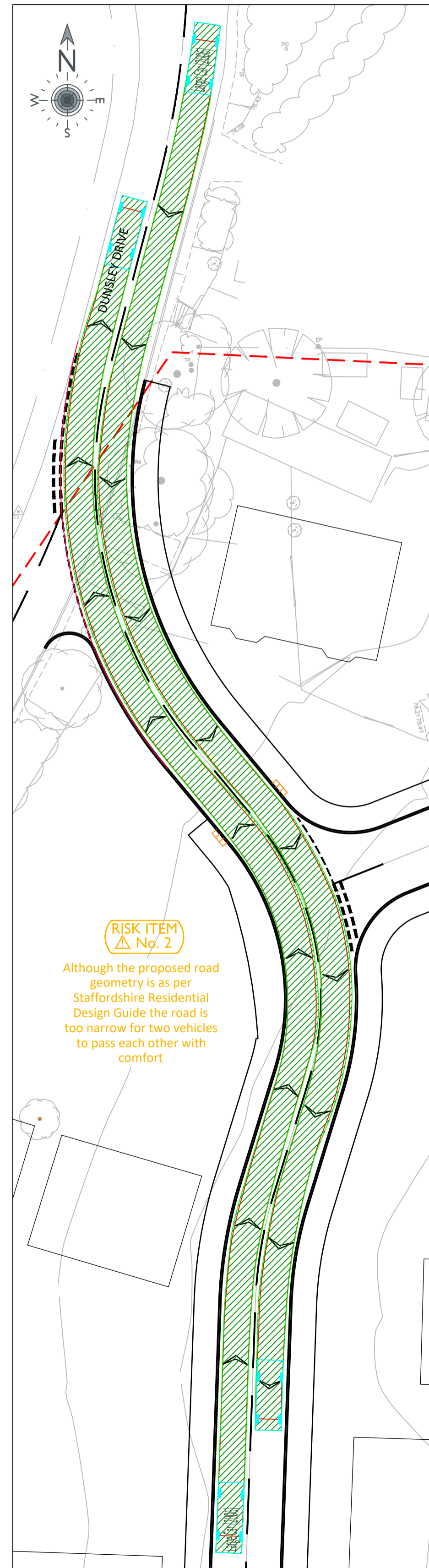
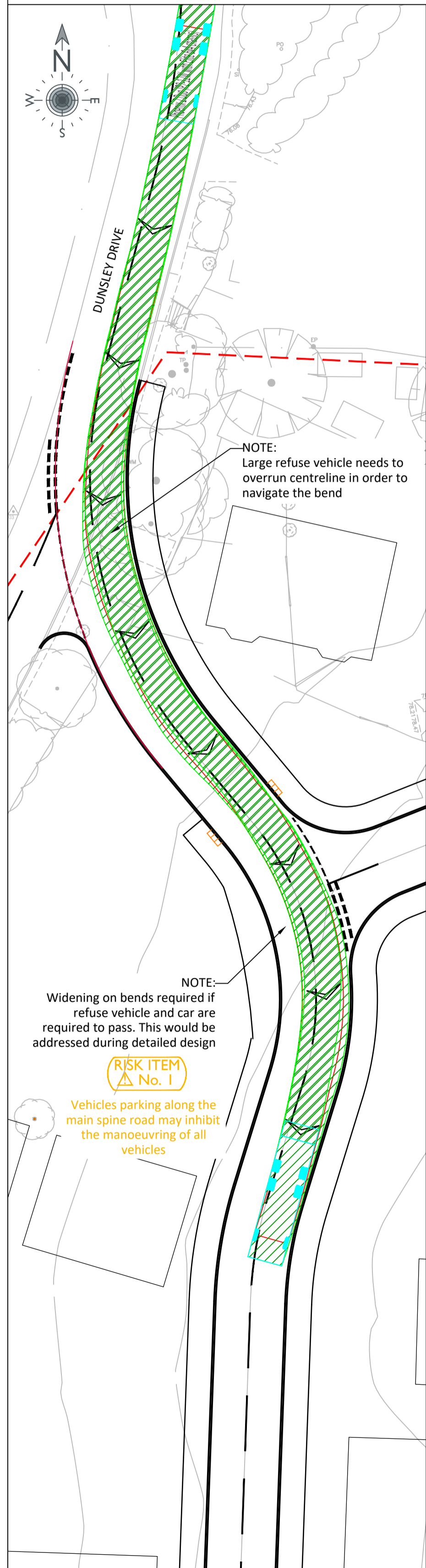
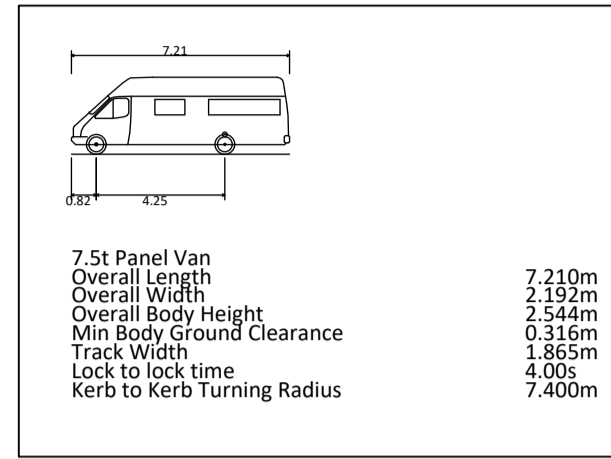
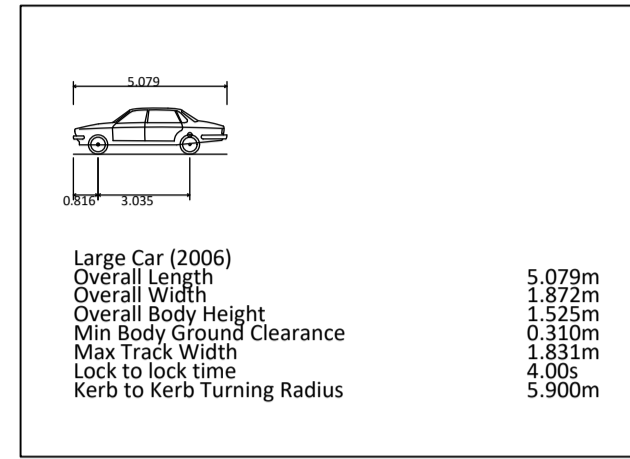
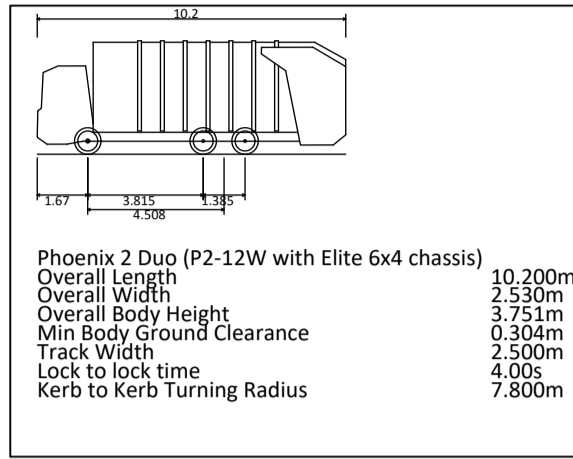
- This drawing is to be read in conjunction with all other relevant Engineering and Architect's details.
- The purpose of this drawing is to display the various design vehicle swept paths manoeuvring through the proposed junction. The drawing is for discussion purposes only, with the design subject to further design development, modelling assessment, data collection and consideration of constraints.
- The concept design is based on topographical survey data and design information for surrounding roads:
 - Topographical Survey (filename: 38125NGLS-01-02.dwg)
 - Internal development layout (filename: BEL13007 Feasibility Layout KW 240119.pdf)
- The highway boundary extents will need to be confirmed. All works are proposed to be within the highway boundary or Developer owned land, it is assumed that the highway and site boundary abut each other.
- The concept alignment and junction has been based on DMRB CD100, CD123, M5 and local authority design standards, existing road conditions and the vehicle swept paths presented have informed/validated the proposed geometry of the layout.
- The design vehicles that have been considered in the swept path analysis have been listed below and the relevant vehicle profiles are included to highlight the vehicle dimensions. The vehicle profiles selected below are the most frequent vehicles expected to access the site.
 - Small Sized Vehicles**
 - Large Car (2006)
 - Medium Sized Vehicles**
 - 7.5t Panel Van
 - Large Sized Vehicles**
 - Refuse vehicle - Phoenix Duo 2 Recycler (P2-15W with Elite 6x4 chassis)*

*design vehicles to be confirmed with the client and local authority and alternative vehicles may need to be used.
- The speeds at which vehicle swept paths have been tracked have been summarised below, subject to approving authority agreement:
 - Large Car 20mph (dropping to 10mph at site access)
 - Panel Van 10mph
 - Refuse Vehicle 10mph
- Offsets to the channel and centre line of the proposed road alignments have been maintained where possible for all vehicle manoeuvres and these are listed as follows, subject to approving authority agreement:
 - Small and medium sized vehicles
 - Channel line clearance 0.25m
 - Centre line clearance 0.25m
 - Large vehicles
 - Channel line clearance 0.50m

PO	07/01/2022	Initial Issue	RAH
REV	DATE	REVISION NOTE	BY
<p>Seven House - High Street Longbridge - Birmingham B31 2UQ - Tel: 0121 475 0234 Birmingham - Bristol Exeter - London - Reading pja.co.uk</p>			
CLIENT			
Bellway Homes Limited			
PROJECT			
Land at Dunsley Drive Dunsley Kinver			
DRAWING TITLE			
Site Access Priority Junction			
DRAWING ISSUE STATUS			
INFORMATION			
PJA JOB NO:	SUB-CODE	DRAWING NO	REVISION
06024	- A	- 100	- P0
Revision Letter : P - Prelim / A - Approval / T - Tender / C - Construction			
BIM DRAWING REFERENCE			
SCALE	DRAWN	REVIEWED	DATE
A1@1:500	RAH	AN	Jan-22



Appendix B Site Access Drawing – Option 2



NOTES

These drawings have been produced with reference to the CDM Regulations 2015. Please note that these are pre-construction phase drawings and should be subject to further design risk management as required in accordance with Regulation 9

- KEY**
- Proposed Contour 50mm Interval
 - Junction Visibility Splay (2.4 x 25)
 - Forward Visibility Splay (25m)
 - Approximate Site Boundary

- This drawing is to be read in conjunction with all other relevant Engineering and Architect's details.
- The purpose of this drawing is to display the various design vehicle sweep paths manoeuvring through the proposed junction. The drawing is for discussion purposes only, with the design subject to further design development, modelling assessment, data collection and consideration of constraints.
- The concept design is based on topographical survey data and design information for surrounding roads:
 - Topographical Survey (filename 38125NG15-01-03.dwg)
 - Internal development layout (filename BEL13007 Feasibility Layout KW 240119.pdf)
- The highway boundary extents will need to be confirmed. All works are proposed to be within the highway boundary or Developer owned land, it is assumed that the highway and site boundary will be confirmed.
- The concept alignment and junction has been based on DMRB CD109, CD123, M5 and local authority design standards, existing road conditions and the vehicle sweep paths presented have informed/validated the proposed geometry of the layout.
- The design vehicles that have been considered in the sweep path analysis have been listed below and the relevant vehicle profiles are included to highlight the vehicle dimensions. The vehicle profiles selected below are the most frequent vehicles expected to access the site.
 - Small Sized Vehicles
 - Large Car (2006)
 - Medium Sized Vehicles
 - 7.5t Panel Van
 - Large Sized Vehicles
 - Refuse vehicle - Phoenix 2 Duo 2 Recycler (P2-15W with Elite 6x4 chassis)

- *design vehicles to be confirmed with the client and local authority and alternative vehicles may need to be used.
- The speeds at which vehicle sweep paths have been tracked have been summarised below, subject to approving authority agreement:
 - Large Car 20mph (dropping to 10mph at site access)
 - Panel Van 10mph
 - Refuse Vehicle 10mph
 - Offsets to the channel and centre line of the proposed road alignments have been maintained where possible for all vehicle manoeuvres and these are listed as follows, subject to approving authority agreement:
 - Small and medium sized vehicles Channel line clearance 0.25m Centre line clearance 0.25m
 - Large vehicles Channel line clearance 0.50m

PO	07/01/2022	Initial Issue	RAH
REV	DATE	REVISION NOTE	BY

PJA
Seven House - High Street
Lodgepole - Birmingham
B31 2UQ - Tel: 0121 475 0234
Birmingham - Bristol
Exeter - London - Reading
pja.co.uk

Bellway Homes Limited

PROJECT
Land at Dunsley Drive
Dunsley
Kinver

DRAWING TITLE
Site Access
Option 2
Through Junction

DRAWING ISSUE STATUS
INFORMATION

PJA JOB No.	SUB-CODE	DRAWING NO.	REVISION
06024	- A -	200	- PO

Revision letter: P - Prelim / A - Approval / T - Tender / C - Construction
BIM DRAWING REFERENCE

SCALE	DRAWN	REVIEWED	DATE
AI@1:500	RAH	AN	Jan-22

Appendix C TRICS Outputs

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

TOTAL VEHICLESSelected regions and areas:

02	SOUTH EAST	
	HC HAMPSHIRE	2 days
03	SOUTH WEST	
	DC DORSET	1 days
	SM SOMERSET	1 days
04	EAST ANGLIA	
	NF NORFOLK	2 days
	SF SUFFOLK	1 days
06	WEST MIDLANDS	
	SH SHROPSHIRE	1 days
	ST STAFFORDSHIRE	1 days
	WK WARWICKSHIRE	2 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days
08	NORTH WEST	
	CH CHESHIRE	2 days
	LC LANCASHIRE	1 days
10	WALES	
	VG VALE OF GLAMORGAN	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 10 to 49 (units:)
 Range Selected by User: 10 to 50 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/13 to 27/05/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	2 days
Wednesday	5 days
Thursday	4 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	16 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone 16

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 16 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,001 to 5,000	2 days
5,001 to 10,000	3 days
10,001 to 15,000	5 days
15,001 to 20,000	3 days
20,001 to 25,000	2 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	1 days
50,001 to 75,000	3 days
75,001 to 100,000	3 days
125,001 to 250,000	4 days
250,001 to 500,000	3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	12 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	4 days
No	12 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 16 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CH-03-A-09	TERRACED HOUSES	CHESHIRE
	GREYSTOKE ROAD		
	MACCLESFIELD		
	HURDSFIELD		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	24	
	Survey date: MONDAY	24/11/14	Survey Type: MANUAL
2	CH-03-A-10	SEMI-DETACHED & TERRACED	CHESHIRE
	MEADOW DRIVE		
	NORTHWICH		
	BARNTON		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40	
	Survey date: TUESDAY	04/06/19	Survey Type: MANUAL
3	DC-03-A-08	BUNGALOWS	DORSET
	HURSTDENE ROAD		
	BOURNEMOUTH		
	CASTLE LANE WEST		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	28	
	Survey date: MONDAY	24/03/14	Survey Type: MANUAL
4	HC-03-A-21	TERRACED & SEMI-DETACHED	HAMPSHIRE
	PRIESTLEY ROAD		
	BASINGSTOKE		
	HOUNDMILLS		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	39	
	Survey date: TUESDAY	13/11/18	Survey Type: MANUAL
5	HC-03-A-22	MIXED HOUSES	HAMPSHIRE
	BOW LAKE GARDENS		
	NEAR EASTLEIGH		
	BISHOPSTOKE		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40	
	Survey date: WEDNESDAY	31/10/18	Survey Type: MANUAL
6	LC-03-A-31	DETACHED HOUSES	LANCASHIRE
	GREENSIDE		
	PRESTON		
	COTTAM		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	32	
	Survey date: FRIDAY	17/11/17	Survey Type: MANUAL
7	NF-03-A-03	DETACHED HOUSES	NORFOLK
	HALING WAY		
	THETFORD		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	10	
	Survey date: WEDNESDAY	16/09/15	Survey Type: MANUAL
8	NF-03-A-05	MIXED HOUSES	NORFOLK
	HEATH DRIVE		
	HOLT		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	40	
	Survey date: THURSDAY	19/09/19	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

9	NY-03-A-11 HORSEFAIR BOROUGHBRIDGE	PRIVATE HOUSING		NORTH YORKSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		23	
	Survey date: WEDNESDAY		18/09/13	Survey Type: MANUAL
10	SF-03-A-05 VALE LANE BURY ST EDMUNDS	DETACHED HOUSES		SUFFOLK
	Edge of Town Residential Zone Total No of Dwellings:		18	
	Survey date: WEDNESDAY		09/09/15	Survey Type: MANUAL
11	SH-03-A-06 ELLESMERE ROAD SHREWSBURY	BUNGALOWS		SHROPSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		16	
	Survey date: THURSDAY		22/05/14	Survey Type: MANUAL
12	SM-03-A-01 WEMBDON ROAD BRIDGWATER NORTHFIELD	DETACHED & SEMI		SOMERSET
	Edge of Town Residential Zone Total No of Dwellings:		33	
	Survey date: THURSDAY		24/09/15	Survey Type: MANUAL
13	ST-03-A-08 SILKMORE CRESCENT STAFFORD MEADOWCROFT PARK	DETACHED HOUSES		STAFFORDSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		26	
	Survey date: WEDNESDAY		22/11/17	Survey Type: MANUAL
14	VG-03-A-01 ARTHUR STREET BARRY	SEMI-DETACHED & TERRACED		VALE OF GLAMORGAN
	Edge of Town Residential Zone Total No of Dwellings:		12	
	Survey date: MONDAY		08/05/17	Survey Type: MANUAL
15	WK-03-A-02 NARBERTH WAY COVENTRY POTTERS GREEN	BUNGALOWS		WARWICKSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		17	
	Survey date: THURSDAY		17/10/13	Survey Type: MANUAL
16	WK-03-A-04 DALEHOUSE LANE KENILWORTH	DETACHED HOUSES		WARWICKSHIRE
	Edge of Town Residential Zone Total No of Dwellings:		49	
	Survey date: FRIDAY		27/09/19	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

PJA Seven House, High Street Longbridge, Birmingham

Licence No: 231601

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
BD-03-A-03	Covid
WO-03-A-07	Covid

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	16	28	0.083	16	28	0.302	16	28	0.385
08:00 - 09:00	16	28	0.157	16	28	0.349	16	28	0.506
09:00 - 10:00	16	28	0.150	16	28	0.230	16	28	0.380
10:00 - 11:00	16	28	0.166	16	28	0.174	16	28	0.340
11:00 - 12:00	16	28	0.170	16	28	0.201	16	28	0.371
12:00 - 13:00	16	28	0.166	16	28	0.199	16	28	0.365
13:00 - 14:00	16	28	0.190	16	28	0.161	16	28	0.351
14:00 - 15:00	16	28	0.174	16	28	0.199	16	28	0.373
15:00 - 16:00	16	28	0.302	16	28	0.237	16	28	0.539
16:00 - 17:00	16	28	0.291	16	28	0.154	16	28	0.445
17:00 - 18:00	16	28	0.331	16	28	0.172	16	28	0.503
18:00 - 19:00	16	28	0.246	16	28	0.136	16	28	0.382
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.426			2.514			4.940

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected: 10 - 49 (units:)
 Survey date date range: 01/01/13 - 27/05/21
 Number of weekdays (Monday-Friday): 16
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 1
 Surveys manually removed from selection: 2

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Land off Dunsley Drive, Kinver, Staffordshire

Heritage Appraisal

edp4711_r006a

QA: CJo/ACr_FMi/CRo_220524

INTRODUCTION

- 1.1 This report has been researched and prepared for Bellway Homes by The Environmental Dimension Partnership Ltd (EDP) and sets out an archaeology and heritage appraisal of a site known as Land off Dunsley Drive, Kinver, Staffordshire where the key objectives are to: (1) confirm its deliverability and capacity for development; and (2) provide early guidance on the design of the proposals to avoid or minimise adverse impacts from development and hence support its promotion for residential development.
- 1.2 The site is situated in Staffordshire, within the administrative area of South Staffordshire District Council, which acts as the statutory planning authority. South Staffordshire District Council has commenced a District Plan Review to identify land to accommodate the remainder of the adopted South Staffordshire District Plan (SSDP) housing requirement.
- 1.3 This Appraisal has been informed by a desk-based review of data relating to heritage assets and is supported by a visit to the site and its immediate environs undertaken in June and November 2019 and May 2024. This Appraisal should be read in conjunction with the Preliminary Landscape Position Paper (edp4711_r007), which sets out the character of the site and establishes, in basic terms, its visual envelope.

SITE DESCRIPTION

- 1.4 The site is to the east of the village of Kinver, in South Staffordshire, where it is centred on approximately National Grid Reference (NGR) 385199, 283770 and covers circa 1.16 hectares (ha) of agricultural farmland that gently slopes from east to west.
- 1.5 The site is bounded to the north, south and west by existing residential development and by agricultural land to the east.
- 1.6 The site's western boundary is formed by a hedgerow interspersed with trees, beyond which lies Dunsley Drive. The 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 trees and also hedgerow planting.

- 1.7 The LVA establishes that the topography of the local landscape results in a relatively limited visual envelope. To the east, there are intermittent views of the site from the adjacent fields, but not further than the ridgeline c.200m distant.
- 1.8 To the west, north and south, the existing residential development on Dunsley Drive screens the site from any short or middle-distance views (i.e. from Dunsley Road or beyond). The tree belts to the south/south-east of the site are an additional screening element within the local landscape, particularly in terms of blocking views to/from the Kinver Conservation Area and in the direction of the canal.
- 1.9 There are no views of the historic core of the settlement of Kinver, but there is intervisibility with Kinver Edge, located c.1km to the south-west.

LEGISLATION AND POLICY REVIEW

Legislation

- 1.10 The relevant legislation concerning the treatment of scheduled monuments is the *Ancient Monuments and Archaeological Areas Act 1979*. This Act details the designation, care and management of scheduled monuments, as well as detailing the procedures that are needed to obtain permission for works that would directly impact upon their preservation.
- 1.11 The Act does not confer any statutory protection on the setting of scheduled monuments, although this is considered as a policy matter in the relevant paragraphs of the National Planning Policy Framework (NPPF; December 2023).
- 1.12 S66(1) and 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* set out the statutory duties of Local Planning Authorities (LPA) in respect of the treatment of listed buildings and conservation areas through the planning process.
- 1.13 Section 66(1) of the 1990 Act sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting.
- 1.14 Section 72(1) of the 1990 Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework

- 1.15 The NPPF sets out the government's approach to the conservation and management of the historic environment, including both listed buildings and conservation areas, through the planning process (Section 16).
- 1.16 The opening paragraph, 200, recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 1.17 Paragraph 206 concerns planning applications, stating that:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

1.18 NPPF paragraph 203 is relevant when it states that:

“In determining applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. the desirability of new development making a positive contribution to local character and distinctiveness.”*

1.19 Paragraph 205 considers the weighting given within the planning decision with regard to impacts on designated heritage assets, stating that:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

1.20 Paragraph 206 considers the level of harmful effects on designated heritage assets and states that:

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional; and*
- b. Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional¹.”*

¹ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

1.21 With regard to the decision-making process, paragraphs 207 and 208 are of relevance.

1.22 Paragraph 207 states that:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. The nature of the heritage asset prevents all reasonable uses of the site;*
- b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. The harm or loss is outweighed by the benefit of bringing the site back into use.”*

1.23 Paragraph 208 states that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

1.24 The threshold between substantial and less than substantial harm has been clarified in the Courts. Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* (2013) EWHC 2847 are of relevance here in the way they outline the assessment of ‘harm’ for heritage assets:

“What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.

Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether [i.e. destroyed] or very much reduced.”

1.25 In other words, for the ‘harm’ to be ‘substantial’, and therefore require consideration against the more stringent requirements of paragraph 207 of the NPPF compared with paragraph 202, the proposal would need to result in the asset’s significance either being “*vitiated altogether or very much reduced.*”

1.26 Paragraph 209 refers to non-designated heritage assets identifying that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly

or indirectly effect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

- 1.27 In relation to non-designated heritage assets, Footnote 72 explains the exemption to the ‘balanced judgement’ exercise outlined in paragraph 209 in cases where:

“Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”

- 1.28 Paragraph 212 of the NPPF sets out that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

South Staffordshire Local Plan

- 1.29 The South Staffordshire Publication Plan 2024 is currently under review and will contain updated and detailed development management policies. Whilst this is under review the policies of the South Staffordshire Local Plan Core Strategy adopted in 2012 and the Site Allocations Document (SAD) adopted in September 2018 remain in place until their replacement by the new adopted plan.

- 1.30 Under Environmental Quality, Strategic Objective 5 is as follows: *“To protect, conserve and enhance the historic environment and heritage assets and ensure that the character and appearance of the District’s Conservation Areas is sustained and enhanced through management plans and high-quality design.”*

- 1.31 Within Core Policy 2 (Protecting and Enhancing the Natural and Historic Environment), the salient policy is EQ3 ‘Conservation, Preservation and Protection of Heritage Assets’. This policy sets out a number of means by which the preservation of South Staffordshire’s historic environment will be achieved. Those relevant to this Appraisal are as follows:

- a. “...
- b. ...
- c. *The Council will ensure that development which affects a heritage asset or its setting will be informed by a proportionate assessment of the significance of the asset, including its setting, which is likely to be affected by the proposals. These will be judged by considering the extent to which an asset’s archaeological, architectural, historic or artistic interest will be harmed, including its conservation, in the interest of present and future generations; and*
- d. *In the case of development in a conservation area, proposals will be considered against any management plan and appraisal adopted for that area.*

Development proposals should be consistent with the NPPF, the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions) and other local planning policies.”

Kinver Neighbourhood Development Plan 2023-2038

1.32 The Kinver Neighbourhood Development Plan 2023–2038 was made in 2023. It includes the following heritage related policies:

Policy KN08: Historic Environment

1. *“The layout of development must preserve or enhance evidence of burgage plots and avoid compromising the open character of gardens based on the burgage plot layout.*
2. *Rock cottages and other rock cut structures and their settings should be preserved or enhanced.*
3. *Where demolition of an historic building is justified, the replacement building should:*
 - a. *Reinforce the predominant townscape character, including height, massing and setback from the road;*
 - b. *Demonstrate exceptional design quality, to make up for the loss of historic fabric and character;*
 - c. *Incorporate features to reduce carbon emissions, to compensate for the loss of embodied energy involved in demolition.*
4. *Support will be given to works to upgrade the environmental performance of historic buildings, provided the works preserve or enhance the character of the historic building.*
5. *Development should enhance the character and appearance of the Staffordshire and Worcestershire Canal Conservation Area or Stourbridge Canal Conservation Area, including waterway, towpath, other features and setting.”*

Policy KN09: Kinver Conservation Area

1. *“Buildings that contribute to the special architectural or historic interest and character of the Conservation Area should be preserved and sensitively reused, retaining their original architectural or historic features, as part of any development proposal.*
2. *Development within the High Street should complement the key townscape characteristics of the Conservation Area, including:*
 - a. *the predominant two or three storey height of buildings;*
 - b. *rear-of-the-pavement frontages;*
 - c. *layout and open gardens reflecting burgage plots.*

3. *Development within High Street shopping area must maintain active frontages and shopfronts at ground floor level.*
4. *Shopfronts should be designed to complement the building in their form, design and materials and surviving historic shopfronts or elements from historic shopfronts should be retained.*
5. *The reinstatement of historic shopfronts will be supported.*
6. *Roller shutters and projecting boxes should be provided internally and must not project forwards of the shopfront.”*

Kinver Conservation Area Management Plan (2011)

- 1.33 The historic core of Kinver is covered by a conservation area designation, and this was most recently subject to the completion of a management plan by the Council in 2011. Most of the management plan concerns the boundary and buffer of the conservation area, and development within this defined zone.
- 1.34 As such, these do not apply to the proposed development of the site. However, section 3.2 concerns the protection of the broader landscape setting and views and is therefore of relevance to this Appraisal. The Council’s management plan identifies that:
- “3.2.1 *The landscape setting of the Kinver Conservation Area is very important. It has been established that new development on the edges of the conservation area affects views into and out of the conservation area, and can adversely affect the area’s special architectural or historic interest...;*
- 3.2.3 *Views across the Kinver Conservation Area are very important given the dramatic topography and river- and canal-side location. The unique qualities of the conservation area rely on the continued protection of these views; and*
- ...
- 3.2.5 *Action: The Council will also seek to ensure that these views remain protected from inappropriate forms of development and that due regard is paid to them in the formulation of public realm works or enhancement schemes.”*
- 1.35 Insofar as it is relevant, the legislation, policy and guidance detailed above will be addressed in **Section 4**.

HERITAGE BASELINE

- 1.36 The site does not contain any ‘designated heritage assets’ (see Annex 2 of the NPPF), nor is it located (either wholly or in part) within the boundary of such an asset. As such, there are no ‘in principle’ or overarching heritage constraints to the deliverability of the site for development or in terms of its capacity to accommodate development.
- 1.37 In respect of non-designated assets (again, see Annex 2 of the NPPF), an examination of data from the Staffordshire Historic Environment Record (HER) does not identify any known or recorded archaeological features or finds within the site’s boundaries.
- 1.38 Abutting the site to the north, the HER records the former Dunsley Farm (MST17982). This was a farmstead on a courtyard arrangement: the farmhouse has been demolished but other 18th and 19th century buildings still remain, converted to dwellings. The farm is suspected to have earlier origins. A related HER entry for an area immediately to the east, relates to Dunsley Manor Farm (MST17981). To the south of the site is Dunsley House, an un-listed historic house which dates to the early 19th century.
- 1.39 Turning to the wider surroundings of the site, the baseline data indicates the presence of a number of assets that require consideration by this Heritage Appraisal. These are discussed in turn below and are as follows:
- Enville Grade II* Registered Park and Garden (NHLE ref. 1000114) and its component listed buildings;
 - Grade I Listed Church of St Peter, Kinver (NHLE ref. 1230950);
 - Kinver Camp Iron Age Hillfort Scheduled Monument (NHLE ref. 1015432);
 - Kinver Conservation Area;
 - Staffordshire and Worcestershire Canal Conservation Area; and
 - Holy Austin Rock Houses, Kinver Edge (non-designated asset; MST1158).

Enville Grade II* Registered Park and Garden

- 1.40 The citation states that the manor of Enville was held from the early 16th century by a minor branch of the Grey family, which survived the aftermath of Lady Jane Grey’s brief assumption of English rule in 1553. A new house was built on the estate in the mid-16th century and forms the core of the present Grade II listed Enville Hall (NHLE Ref. 1230636).
- 1.41 The house was enlarged by stages in the late 17th and early 18th centuries and again in the 1770s. Various alterations were also made in the early 20th century. The park itself (1000114) was a creation of the mid-18th century, occupying land that had originally been a medieval deer park, later given over to cultivation.
- 1.42 The park was completed by the 1770s, extending to the south of the Hall over 750 acres with a variety of buildings, lakes, cascades and bridges from which the landscape might be

viewed. It was a celebrated regional attraction but declined in the early 19th century before new gardens and pleasure gardens were developed to the north of the Hall in the Victorian period. The early 20th century once again saw decline before restoration in recent decades.

- 1.43 The registered area of the park comprises c.300ha, extending to the south of the village of Enville. It incorporates 11 listed buildings, where 10 are listed at Grade II, with The Museum, which was formerly a summerhouse and dated to c.1750 individually designated at the higher level of Grade II* (1278514).
- 1.44 The park is quite self-contained, with the key 18th century elements of the Hall and water features primarily intended to reference each other within the context of the designed landscape. The park as a whole is encompassed by a number of woodland coverts and copses, including substantial planting on its southern margins, reflecting an intentionally enclosed landscape designed to be separated from the wider agricultural landscape which surrounded it and, in the process, create a sense of privacy and seclusion.
- 1.45 The site and the registered park are separated by a distance of some 2.5km and the houses on Dunsley Road and Drive preclude any visual inter-relationship(s). Hence, the site area is not considered to fall within the setting of the registered park and makes no contribution at all to its significance. Development of the site would not have any impact on the setting of the park and so it is not assessed as representing a constraint to either its deliverability for development or its capacity to accommodate that development.

Grade I Listed Church of St Peter

- 1.46 The Church of St Peter, Kinver (NHLE Ref. 1230950) is designated as a Grade I listed building. The main body of the church, including the tower, is mainly early- to mid-14th century in date and incorporates some 12th century fragments of an earlier church. There are substantial mid-15th century extensions. It was restored in 1884/1885.
- 1.47 The church lies at the summit of a steep sided ridge, above and to the south of the historic core of Kinver; these attributes providing its setting and historic context.
- 1.48 The parish church is separated from the site by c.1.3km, with the historic core of Kinver in between, focused on the curvilinear course of High Street running into Church Hill, as well as a large swathe of modern housing estates on its eastern side.
- 1.49 The site is a distant element in the view out from the north-eastern edge of the churchyard. It is partially visible looking through the mature woodland that fringes the churchyard, but it is obscured by the existing houses on Dunsley Drive and trees on the site's southern fringe. The site is an eye-catching feature of inwards views from the site area.
- 1.50 The elements of the parish church's wider setting which contribute most to its significance are its relationships with: (i) the enclosing churchyard; (ii) the historic settlement at the foot of the steep ridge on the north side; and (iii) the wider parish beyond, in view of the fact that it would have formed the administrative and spiritual focus.

- 1.51 Arguably the outward views *from* the church are less significant than views of and *including* the church. It is a prominent structure, clearly intended to be seen from a distance, the present gap in the woodland on Kinver Edge emphasises this situation.
- 1.52 Although the site is a small and peripheral element of the Church's setting, it is not one that contributes to its heritage significance and therefore the proposed development of the site would not cause harm in that respect. This building is not assessed as constraining either the deliverability or the capacity of the site to accommodate residential development.

Kinver Camp Iron Age Hillfort Scheduled Monument

- 1.53 This scheduled monument (NHLE Ref. 1015432) is positioned at the north-west corner and highest point of the Kinver escarpment, on the south-western outskirts of Kinver.
- 1.54 The monument includes the earthwork and buried remains of a univallate Iron Age fort. The hillfort's earthworks are sub-rectangular in plan and exhibit external dimensions of c.210m by 300m, thus enclosing an area of approximately 3.75ha.
- 1.55 In common with both of the preceding assets, the majority of the monument's significance is held in the physical form and fabric and its setting thus provides the minority portion. With that in mind, the hillfort's location on the northern edge of the Kinver escarpment makes a strongly positive contribution to its significance because it would not only have made it very defensible (closing off one line of attack from the north), but also a widely visible landmark in the wider Iron Age landscape and additionally a strategic location from which to exert a degree of control over that landscape.
- 1.56 There are (unsurprisingly) wide-ranging views outwards into the landscape from the hillfort, with these principally being the result of its topographic location and the distribution of trees and scrub around the edges of the escarpment. These views include a diverse landscape of fields and houses and take in the built-up extents of Kinver in the immediate surroundings and extend as far east as the high rise flats of the Black Country to the north east. The site forms one very small element within that very extensive landscape setting.
- 1.57 Separated from the scheduled hillfort by some 2.5km of existing development, the site area is assessed as representing an element of this heritage asset's wider setting, which makes no contribution to its significance.
- 1.58 The development of the site would represent a change within the wider setting of this asset, but it would be a limited and peripheral one and not a change bearing upon the significance of the asset or the ability to appreciate the asset.
- 1.59 Proposals for development of the site would not result in the loss of the asset's setting or damage to its setting. Neither would development of the site preclude or restrict views to or from this designated heritage asset and so therefore the monument does not represent a constraint to the deliverability of the site for development or the capacity of the site to take on board development in light of the Local Plan.

Kinver Conservation Area

1.60 The Kinver Conservation Area Management Plan (adopted 11 November 2011) sets out a mid-to long-term strategy in the form of a series of recommendations and guidelines. The extent and composition of the conservation area is set out in paragraph 2.1.1 of the document, as follows:

“The Conservation Area covers the historic High Street, with its shops, banks and other commercial premises; the green fields and woods which lie up steeply rising hills to the south west, forming Kinver Edge; Church Hill and the historic St. Peter’s Church, visible on the crown of the hill from many vantage points in the conservation area; and, lastly, the sinuous curves of the River Stour and the adjoining Staffordshire and Worcestershire Canal, between which lie open fields and areas of woodland.”

1.61 Paragraph 3.1.2 subsequently observes that:

“Despite mainly late 20th century housing, which lies in closely defined areas to the west, north and east of the conservation area, Kinver retains a village quality, which is reinforced by the rural setting and waterside location.”

1.62 Paragraph 3.2.1 further adds that:

“Kinver is notable for the high sandstone ridge which forms the southern and western part of the conservation area, and which lies about 50 metres above the High Street. This forms a backdrop in views from the High Street and beyond, punctuated by the outline of St. Peter’s Church on the skyline.”

1.63 The mosaic of woodland and farmland west of Kinver and the rolling agricultural fields to the east also form key aspects of the setting of the conservation area and contribute to its special interest by maintaining the village’s character as a historic rural settlement and connecting it to its wider agricultural hinterland, despite the substantial and extensive residential growth to the north during the 20th century.

1.64 The site abuts the north-east corner of the conservation area. At the boundary is Dunsley House and its garden (early 19th century, noted above as HER record MST17983).

1.65 Beyond Dunsley House to the south and west, the Kinver Conservation Area is characterised by areas of woodland, particularly along the Staffordshire and Worcestershire Canal and the River Stour, as well as areas of public open space.

1.66 The closest housing estate to the site is that on the lane named Kernose Mill, c.500m south-west of the boundary.

1.67 There is little intervisibility between the site and the adjacent parts of the conservation area. Dunsley House and the properties at the southern end of Dunsley Drive (West Point House, Elsfield) block much of the potential view, while the woodland close to the site boundary precludes views further into, or outwards from, the conservation area.

- 1.68 The 'positive views' in this locality which are identified by the Council on the Conservation Management Plan's Townscape Appraisal map, including that north from the canal, would neither be precluded or altered as a result of development at the site and the same points are reiterated in respect of the Staffordshire and Worcestershire Canal Conservation Area.
- 1.69 In terms of the more elevated parts of the conservation area (i.e. Kinver Edge), there are outward views across a broad area of the surrounding landscape and the site is discernible in these views and therefore forms a part of its setting.
- 1.70 However, it makes up just a very small part of the conservation area's setting and similarly makes a very small contribution to its significance by virtue of representing an area of open agricultural farmland and hence forming a remaining element of the agricultural landscape that would have supported the settlement historically.
- 1.71 Development of the site would give rise to only a very small degree of change to the setting of the Kinver Conservation Area, since it would still be experienced and appreciated in the same ways and views, and could thus generate nothing more than a small impact on its significance as a consequence.
- 1.72 This very small and localised impact, to a peripheral part of the conservation area, would need to be weighed against the benefits of new development and this is not considered to represent a significant constraint to the deliverability or capacity of the site for development through the emerging Local Plan process.
- 1.73 Given the importance afforded to the 'green' and open spaces within the conservation area, as set out by the Council's adopted Management Plan, it is obvious that future residential growth should be focused away from this designated heritage asset, in order to avoid or minimise harm to its character and appearance.

Staffordshire and Worcestershire Canal Conservation Area

- 1.74 The Staffordshire and Worcestershire Canal passes to the east of the town of Kinver, but where it overlaps with the Kinver Conservation Area this feature is not separately designated and only possesses a separate designation outside and to the south and north-east.
- 1.75 To the south the canal comes within c.190m of the site, before turning to follow a sinuous course westwards. It then turns to the north and north-east and wraps around the north of the site, at a closest distance of c.300m.
- 1.76 To the north, the site and the canal conservation area are separated by the existing housing on the north side of Dunsley Road, which screen any visual interrelationships, and the same is broadly applicable in the south, where the natural landform and woodland also combine to restrict an experience or an appreciation of those aspects of this asset that contribute to its significance.
- 1.77 In light of the above, the residential development of the site is unlikely to have any impact on the significance of the conservation area and this long and extensive designated asset would not constrain either its deliverability or capacity.

Kinver Edge Rock Houses

- 1.78 This non-designated asset comprises a series of six houses cut into the cliffs at Holy Austin Rock (Staffordshire Historic Environment Record Ref. MST 1158). These dwellings are of possible 17th century date, although it is recognised that the name may indicate they were occupied and functioned as a hermitage prior to the Reformation.
- 1.79 It is recorded that the rock-cut houses were used and inhabited as domestic dwellings until the mid-20th century. The core element of their setting is Kinver Edge, of which these houses are an integral part. The village below provides their broader context.
- 1.80 The Rock Houses and the site are separated by a distance of c.2.5km. As with the hillfort, the site is visible from these 'non-designated assets', but it forms an inconsequential aspect of the view and makes no contribution to its setting.
- 1.81 Whilst the development might give rise to a very limited and peripheral change within the Rock Houses' setting, it is assessed that this would not result in harm to their significance because of the intervening distance and due to the fact that the development represents a small and localised growth in the modern extent of the settlement and where the landscape in between is made up largely of existing buildings.
- 1.82 Accordingly, the Rock Houses (as a non-designated heritage asset) are not considered to be a particular constraint to the site's deliverability for development or to the site's capacity to accommodate that development.

South Staffordshire Historic Environment Assessment

- 1.83 The Historic Environment Assessment (HEA) divides South Staffordshire into 13 project areas and aims to establish the potential for the historic environment of each to absorb new development and housing more especially. This has been carried out by dividing each of the project areas into 'Historic Environment Character Zones' (HECZ) and then assessing the significance of the heritage assets of each zone.
- 1.84 The site falls within two Kinver (KV) project areas: the greater part within character area KVHECZ 2 – East of Kinver and Dunsley, with the small, fenced enclosure in the north of the site within KVHECZ 3 – Dunsley (HEA, Appendix 4).
- 1.85 KVHECZ 2 (including the site) is almost entirely characterised by a landscape created by piecemeal enclosure. This is suggested to have originated in the medieval period as part of an open-field system, subsequently divided into fields that pre-date the formal enclosure process which occurred during the 18th and mid-19th centuries.
- 1.86 There are no historic boundaries within the site area, which instead comprises a single land parcel. An inspection of aerial photographs does not indicate any relict elements of the open field system, but this does not preclude these existing, either as faint earthwork elements or as below-ground archaeology.
- 1.87 The relevant part of the HEA recommendations for KVHECZ 2 are as follows:

“Should land within the zone be allocated ... any proposed development should seek to complement the low settlement density and the conservation and fabric and legibility of the historic landscape character ... Any such development should also be designed to enhance the local vernacular in terms of its scale and architectural form.”

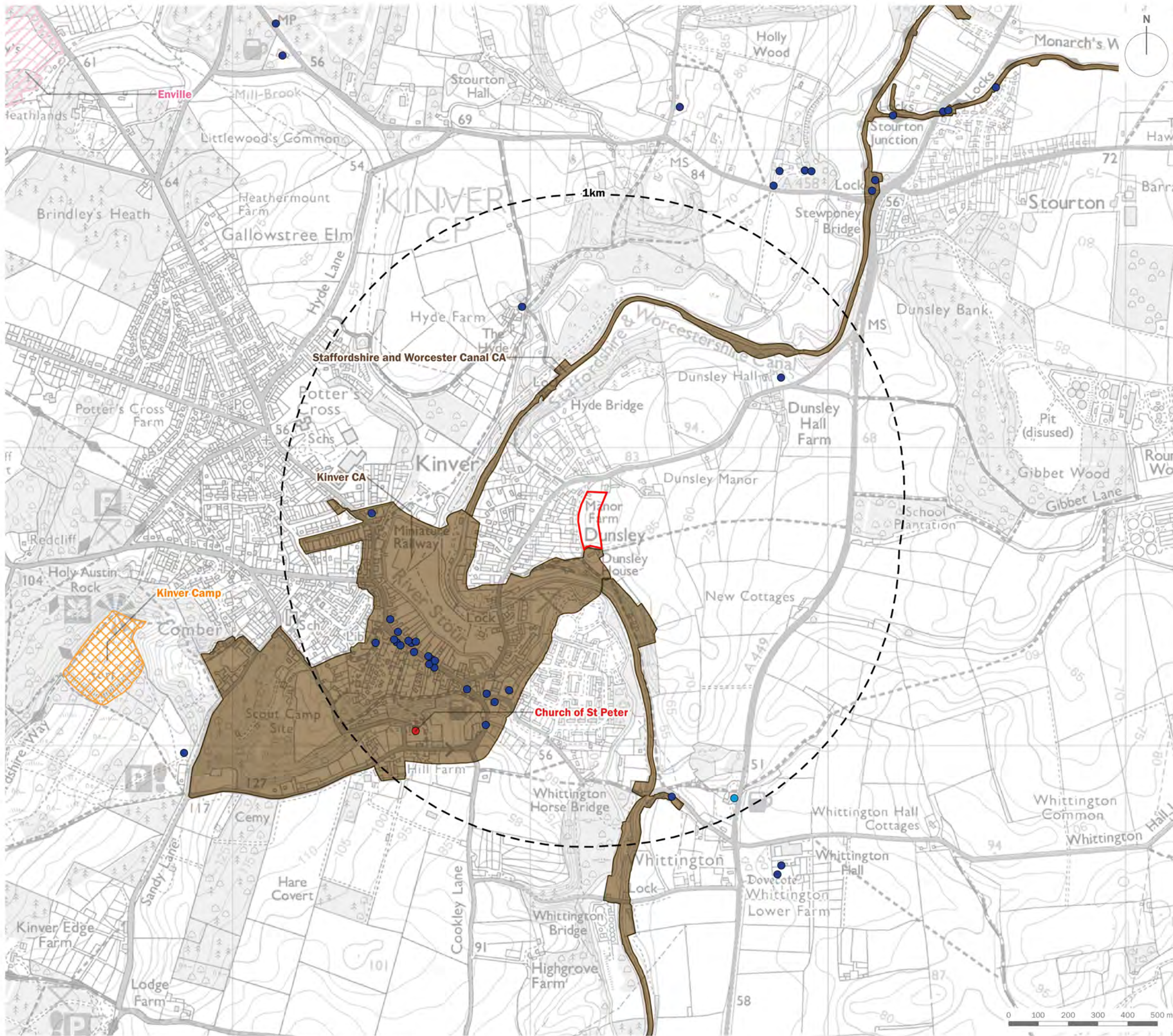
- 1.88 KVHECZ 3 is dominated by the built environment, which is essentially the modern extent of Dunsley. The small parcel of open ground within the site that is included in this character area appears somewhat anomalous. The recommendations of the HEA for KVHECZ 3 largely apply to the preservation of the small number of historic buildings and their settings. These do not apply to the site area.

CONCLUSION

- 1.89 Based on the information above, the development of the site would not have a direct impact on a designated heritage asset and equally proposals for its residential development would not give rise to anything more than a very small impact on such an asset because of changes within its setting.
- 1.90 The only designated heritage asset that would experience a very limited loss of significance because of the site’s development would be Kinver Conservation Area.
- 1.91 None of the other designated heritage assets is likely to be affected and it is also assessed that no non-designated assets are likely to be impacted by the site’s development. There is also a low potential for the presence of hitherto unknown/unrecorded archaeological sites, features, deposits and/or remains within the site footprint and hence present a constraint to its deliverability and/or capacity for development.
- 1.92 Ultimately, it is concluded that the site could come forward and be developed with no more than a limited impact on the historic environment, either directly or indirectly, and could be delivered in accordance with current legislation and planning policy for its conservation and management. Given the absence of significant archaeological or heritage constraints, the site is considered to represent a suitable location for residential development.

Plans

Plan EDP 1: Heritage Context
(edp4711_d005 22 May 2024 DJo/CJo)



- Site Boundary
- 1km Study Area
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Scheduled Monument
- Registered Park and Garden
- Conservation Area

client
Bellway Homes

project title
Land off Dunsley Drive, Kinver

drawing title
Heritage Context

date	22 MAY 2024	drawn by	DJo
drawing number	edp4711_d005	checked	CJo
scale	1:12,500 @ A3	QA	RBa



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Land off Dunsley Drive, Kinver, Staffordshire

Landscape Position Paper

edp4711_r007b

QA: AHu/CMY_FMi/FJe_240524

1 INTRODUCTION, PURPOSE AND APPROACH

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been appointed by Bellway Homes ('the promotor') to prepare a Landscape Position Paper, which examines the prospect of future development on Land off Dunsley Drive, Kinver, Staffordshire (hereafter referred to as 'the site').
- 1.2 The site is situated in Staffordshire, within the administrative area of South Staffordshire District Council, which acts as the statutory planning authority. South Staffordshire District Council has commenced a District Plan Review to identify land to accommodate the remainder of the adopted South Staffordshire District Plan (SSDP) housing requirement.
- 1.3 This Landscape Position Paper provides a preliminary appraisal of the site to inform the early consideration of its design and its promotion in the planning process. It has been informed by a desk-based review of available data, policy, landscape character publications and mapping, and by a site visit undertaken by an experienced Chartered Landscape Architect during early December 2019 and May 2024.
- 1.4 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute¹ specialising in the assessment of the effects of proposed development on the landscape.

2 SITE LOCATION AND SITE DESCRIPTION

- 2.1 The site comprises a parcel of land broadly rectangular in shape. The site is located at Ordnance Survey Grid Reference (OSGR): SO 85195 83756 (centre of the site).
- 2.2 The site is within the West Midlands Green Belt. However, there are no national or local landscape designations situated within or adjoining the site.

¹ LI Practice Number 1010

- 2.3 The site lies to the immediate east of Dunsley Drive, on the eastern side of the village of Kinver and has a predominantly western aspect, with the south-eastern side edge sloping to the north-western corner, see **Image EDP 2.1**.



Image EDP 2.1: View from within the site looking south-east across rising landform. Photograph taken at OSGR: SO 85191 83834 (during May 2024).

- 2.4 The site comprises two interconnecting fields, both of which are managed for equestrian grazing. There is a single-storey equestrian stable building in the north-western corner of the site, with an existing gated access at this boundary from Dunsley Drive, see **Image EDP 2.2**.



Image EDP 2.2: View from within the site looking north-west to an existing stable block on the northern site boundary. Photograph taken at OSGR: SO 85233 83662 (during May 2024).

2.5 The site boundaries comprise the following:

- To the north, the site is bound by existing two-storey residential dwellings situated off an associated private amenity space. These dwellings are accessed off Dunsley Drive and are arranged obliquely to the site (looking east to west). The private amenity space is enclosed by low timber post and wire fencing with occasional trees, see **Image EDP 2.3**;
- The eastern edge of the site is defined by a timber post and wire fence, beyond which there is an open pastoral field. Landform gently rises to the east, beyond which there is no visibility as the land drops away to the north-east towards the Kidderminster/Wolverhampton Road (A449). A number of existing residential dwellings arranged in a complex are visible from the site, see **Image EDP 2.4**;
- To the south, the site is bound by an existing timber post and wire fence, with a private driveway and a collection of existing residential dwellings set within private amenity space with mature landscape features, see **Image EDP 2.5**; and
- The western site boundary comprises a timber post and wire fence, beyond which is a private driveway leading to a number of two-storey residential dwellings set within private amenity space with mature landscape features. The north-western edge of the site is enclosed by Dunsley Drive with two-storey residential dwellings beyond, as shown by **Image EDP 2.6**. The site is situated broadly 1.25m above the level of Dunsley Drive.



Image EDP 2.3: View from within the site looking north towards the adjoining dwelling situated on Dunsley Drive. Photograph taken at OSGR: SO 85187 83672 (during May 2024).



Image EDP 2.4: View from within the site looking north-east towards the existing residential dwellings arranged in a complex. These dwellings are accessed from Dunsley Road. Photograph taken at OSGR: SO 85187 83672 (during May 2024).



Image EDP 2.5: View from within the site looking south towards the existing residential dwellings situated off a private drive from Dunsley Drive. Photograph taken at OSGR: SO 85191 83834 (during May 2024).



Image EDP 2.6: View from within the site looking north-west along the private driveway which encloses the western site boundary, containing existing residential dwellings. Many of these dwellings are two-storey and they sit below the ground level of the site. Photograph taken at OSGR: SO 85187 83672 (during May 2024).

- 2.6 There is no public access available onto the site and there are no Public Rights of Way (PRoW) which pass through the site. Public Footpath Kinver 94 is situated outside of the site, immediate to its southern boundary, as shown by **Images EDP 2.7** and **2.8**. There are no themed, promoted or long-distance walking routes which pass the site within its immediate environment.

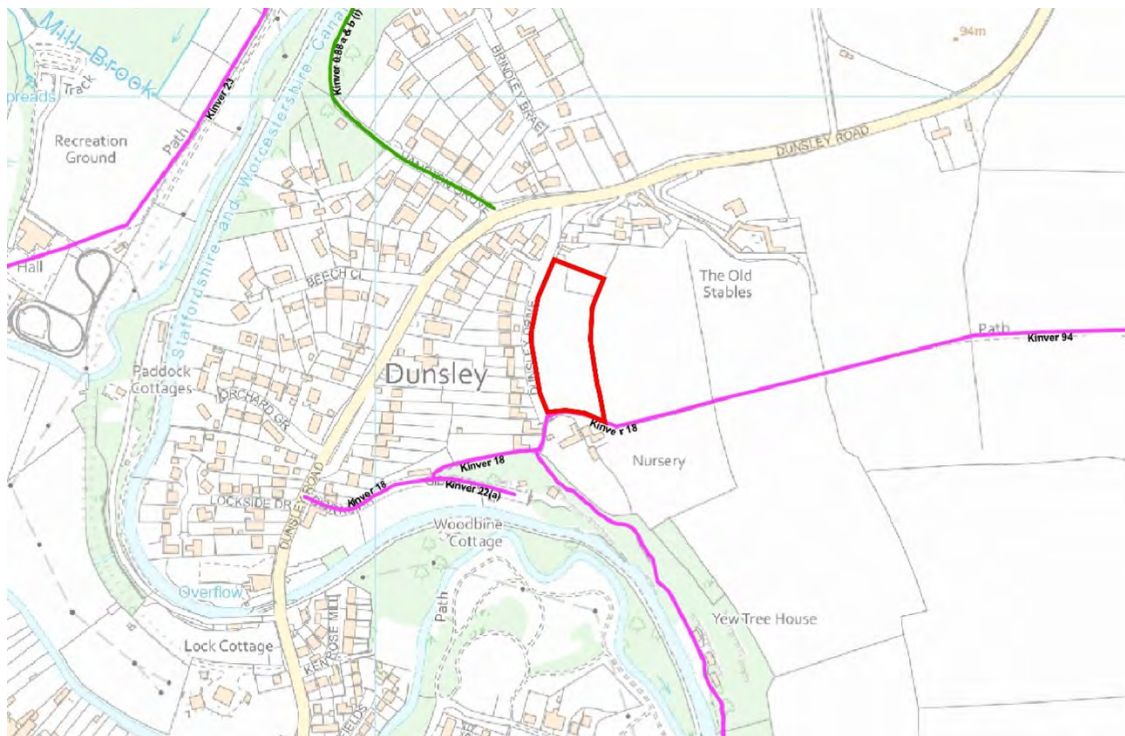


Image EDP 2.7: Extract from the Staffordshire County Council's online Countryside Access and PRow Map. The site is highlighted with a solid red line.



Image EDP 2.8: View from outside the site looking west from PRow (Public Footpath Kinver 94). The site is visible in the middle distance in front of the existing residential built form immediately west of the site. Photograph taken at OSGR: SO 85469 83709 (during May 2024).

- 2.7 Overall, the site does not demonstrate any landscape features worthy of protection and retention other than the trees/hedgerows on its boundaries, many of which would benefit from improved management. The site's topography is an interesting characteristic and could inform the layout of any future development.

3 LANDSCAPE CHARACTER

3.1 The site is situated within a landscape that has been characterised at national and county level. At national level, the site is located within National Character Area (NCA) 66: Mid Severn Sandstone Plateau, see **Image EDP 3.1**.

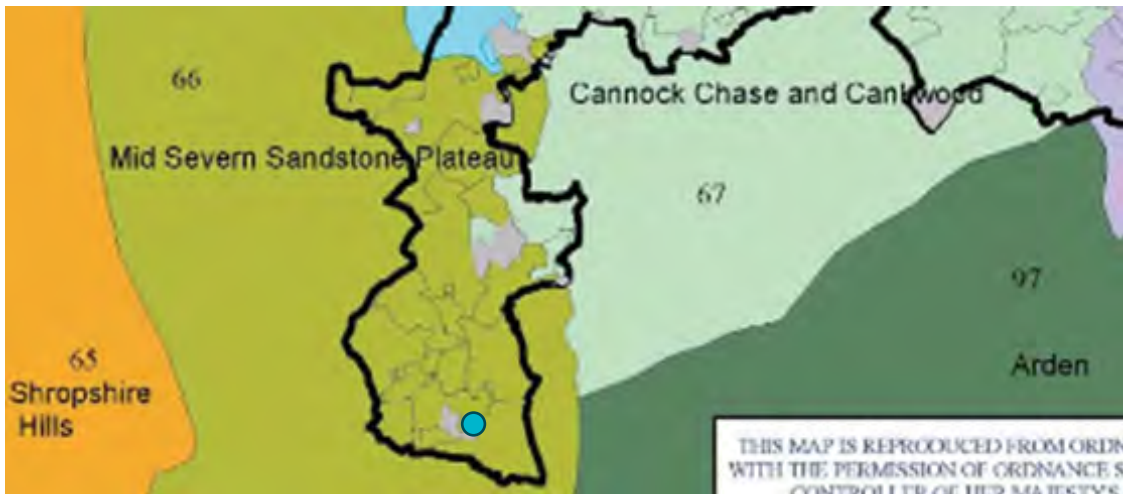


Image EDP 3.1: Extract from Map 2 of Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011'. Site location is marked broadly by a blue circle.

3.2 The county-wide landscape character assessment comprises the 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011', which remains current at the time of writing this Landscape Position Paper. The County Council identify the site within the Sandstone Estatelands Landscape Character Area (LCA), see **Image EDP 3.2**.

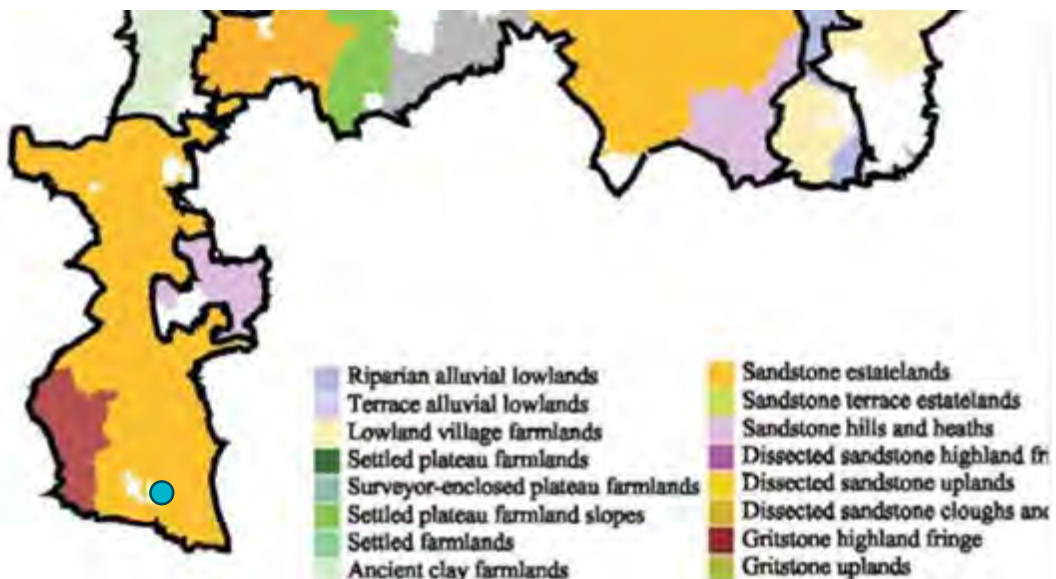


Image EDP 3.2: Extract from Map 4 of Staffordshire County Council's 'Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011'. The site is situated within the Sandstone Estatelands LCA. Site location is marked broadly by a blue circle.

3.3 The character of the Sandstone Estatelands LCA is described as follows:

“The woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape type...Settlement is sparse, and characterised by expanded hamlets and wayside cottages...This is a landscape that appears far more wooded than it actually is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places. The slopes in turn give way to well-treed valleys...”

3.4 Staffordshire County Council continue:

“Villages are expanding with the increase in commuter dwellings and small lanes show the obvious signs of becoming well used rat-runs. Where farmland abuts the conurbation the landscape reflects this influence, hedgerow deterioration being more evident and horsey culture becoming frequent.”

3.5 Staffordshire County Council’s assessment notes the following landscape features common to this LCA. The underlined are noted as common to the site and its immediate surroundings:

- *“Estate Plantations;*
- *Heathy ridge woodlands;*
- *Hedgerow oaks;*
- *Well tree'd stream valleys;*
- *Smooth rolling landform with scarp slopes;*
- *Red brick farmsteads and estate cottages;*
- *Mixed intensive arable and pasture farming;*
- *Large hedged fields;*
- *Halls and associated parkland; and*
- *Canal.”*

3.6 Further to this, under the heading of ‘Incongruous Landscape Features’, Staffordshire County Council notes the following points relative to this LCA. The underlined are identified as common to the site and its immediate surroundings:

- *“Power lines;*
- *Village expansion;*
- *Urban edge;*
- *Modern farm buildings;*

- *Deteriorating hedgerows;*
- *Commuter dwellings; and*
- *Busy roads.”*

3.7 Naturally, the degrading effect of such factors vary across the Sandstone Estatelands LCA with such factors, as detailed above, having a greater or lesser effect on the intactness of the landscape character. In their assessment, Staffordshire County Council asserts that the “*landscape character type is locally sensitive to the impacts of development and land use change.*”

3.8 A site visit was undertaken by a Chartered Landscape Architect during December 2019 and May 2024, during which the character of the site was appraised. With reference to the key characteristics listed (above) for the Sandstone Estatelands LCA, this review found that there are a number of key differences within the site, including:

- No representation of “*...Estate Plantation*”, which is more reflective of land practices further north of the site within the wider open countryside beyond nearby estate plantations associated with the Enville and Stallybridge Estate (i.e. ‘The Million Woodland’). There is a small parkland remnant around Dunsley Hall, off Dunsley Road, which is approximately 0.75km north-east of the site. Consequently, the presence of “*Halls and associated parkland*” are outlying to Kinver and not within the environment of the site;
- No representation of “*...Commuter dwellings and urban edge*”, albeit the site is situated on the village edge adjacent to well established modern development (latter half of the 20th century). Dunsley Drive is a quiet residential road, leading to Dunsley Road, whilst traffic on Dunsley Drive is infrequent and Dunsley Road is one of a number of routes into Kinver;
- No representation of “*large hedged fields*”, with the site situated in a field pattern of small to medium scale. Hedgerows are commonly gappy in this location through either their age, being outgrown or degraded, or previously removed. The site is predominantly enclosed by timber post and wire fencing, with the probability of previous hedgerow extraction within the site;
- No representation of “*Red brick farmsteads and estate cottages*” as the site does not contain development, and that development surrounding the site is more modern ‘suburban’ style built form; and
- No representation of “*well tree'd stream valleys*” at the site, or within its vicinity, albeit these features can be found in the wider landscape area.

3.9 It is considered that the site makes only a limited contribution to the key characteristics of the landscape of the Sandstone Estatelands. Additionally, there are a number of landscape detractors discernible from the site. These detractors are predominantly associated with the position of the site on the village edge of Kinver and the perception of existing residential development from within the site, see **Section 2, Images EDP 2.3 and 2.4.**

4 VISUAL AMENITY

- 4.1 The site's location to the eastern side of the village, adjacent to well established modern development (latter half of the 20th century) to the west means that it has the potential to integrate well with the existing settlement when visible in wider views. During the site visit, the zone of visual influence of the site (i.e. those areas of the surrounding landscape which have potential views of the site) was established and then these areas were visited to establish whether ground level views were accessible, and if so, how the site appeared.
- 4.2 **Image EDP 4.1** illustrates the location of PRoWs within the wider environment of Kinver and the open countryside which surrounds the village. This extract from Staffordshire County Council's PRoW map demonstrates the footpath found to the east (Public Footpath Kinver 94) which traverses through open countryside away from the site on the settlement edge.
- 4.3 Public Footpath Kinver 18 (adjoining the southern site edge and to the south-west) routes through existing dwellings within the urban setting. Public Footpath Kinver 22a and 22b lead down to the Staffordshire and Worcestershire Canal (south of the site) and so are situated within a valley landscape that is well vegetated.

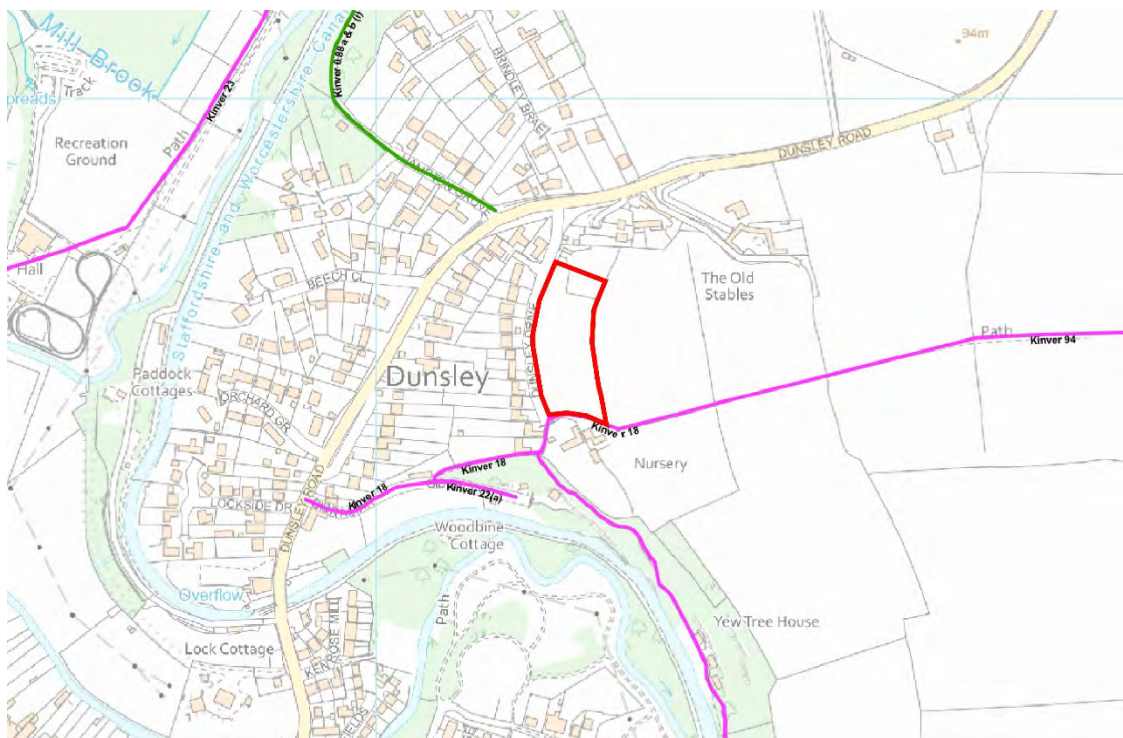


Image EDP 4.1: Extract from the Staffordshire County Council's online Countryside Access and PRoW Map. The site is highlighted with a solid red line.

- 4.4 The broad extent of the view available from each of these areas is described below:
- To the north, the site is enclosed by the existing residential dwellings adjoining the site, and the combination of landform adjoining the site and the verge of Dunsley Drive and mature landscape features within private amenity space, see **Image EDP 4.2** and **Section 2, Image EDP 2.6;**



Image EDP 4.2: View from outside the site looking south down Dunsley Drive towards the western site boundary. Photograph taken at OSGR: SO 85171 83814 (during May 2024).

- To the east, landform rises towards a local ridgeline, beyond which landform falls eastwards towards the Kidderminster/Wolverhampton Road (A449), see **Section 2, Images EDP 2.4** and **2.8**. There are a small number of residential dwellings to the north-east which overlook the site. In the wider landscape, any vantage point including the site would be over 1km to the east;
- To the south, the site is overlooked by a small collection of residential dwellings, with the PRoWs, Public Footpath Kinver 94 and 18, passing the site, see **Section 2, Image EDP 2.5** and **2.8**. Views from these Public Footpaths are already influenced by the settlement edge location. Beyond this, views of the site are substantially filtered, if not screened, by existing built form and mature landscape features;
- To the west, the site is bounded by either a public roadway or private driveway containing residential built form, see **Section 2, Image EDP 2.6**; and
- There is a network of PRoWs situated south and south-west of the site on elevated landform above the village. With the greatest degree of elevation above the village, these routes, including those around Holy Austin Rock and St Peter's Church, provide expansive panoramic views over the village and the landscape beyond. Within views towards the site from this the junction of Public Footpath Kinver 54 and 89 (see **Image EDP 4.3**) the site appears well integrated with the existing settlement, with existing, long-established development to either side (on Dunsley Drive), and development beyond the site (off Dunsley Drive). The site appears to be on the existing edge of the settlement but situated adjoining existing development and not situated on a prominent ridgeline where development may appear detached from the village and incongruous.



Image EDP 4.3: View from Public Footpath Kinver 54 and 89 on elevated landform around St Peter's Church, approximately 0.8km south-west of the site (at its closest point). Photograph taken at OSGR: SO 84705 83068 (during May 2024).

- 4.5 From the residential properties situated off Dunsley Drive (primarily) and north-east of the site off Dunsley Road (see **Section 2**), these dwellings have views over the site to the countryside beyond. Although such views are not protected in planning policy terms, any future application should take this into consideration.

5 LANDSCAPE SENSITIVITY

- 5.1 In July 2019, South Staffordshire District Council published their 'South Staffordshire Landscape Sensitivity Assessment' (Final Report). This assessment forms an important evidence base for the preparation of the South Staffordshire Local Plan.
- 5.2 The purpose of this study was to provide an assessment as to the extent of which *"the character and quality of landscape abutting is in principle susceptible to change as a result of introducing new built form."*
- 5.3 This study specifically considers new residential development. The settlement of Kinver is defined by this study as a 'Main Service Village' and, therefore, a Tier 4 settlement in this study.
- 5.4 In terms of scope, this study considers the landscape sensitivity of land within the West Midlands Green Belt which is: *"immediately adjacent to selected South Staffordshire settlements (Tier 1-4 settlements) ... encompassing locations identified through the South Staffordshire 'Call for Site' exercises, and land adjacent without promoted sites"*.

- 5.5 South Staffordshire District Council define landscape sensitivity as: *“the relative extent to which the character and quality of an area (including its vital attributes) is likely to change as a result of introducing a particular type of development”*.
- 5.6 This study appraises parcels of land, some of which are large and expansive tracts of land. The study includes the site within a wider parcel of land (identified by South Staffordshire District Council as SL2), see **Image EDP 5.1**.

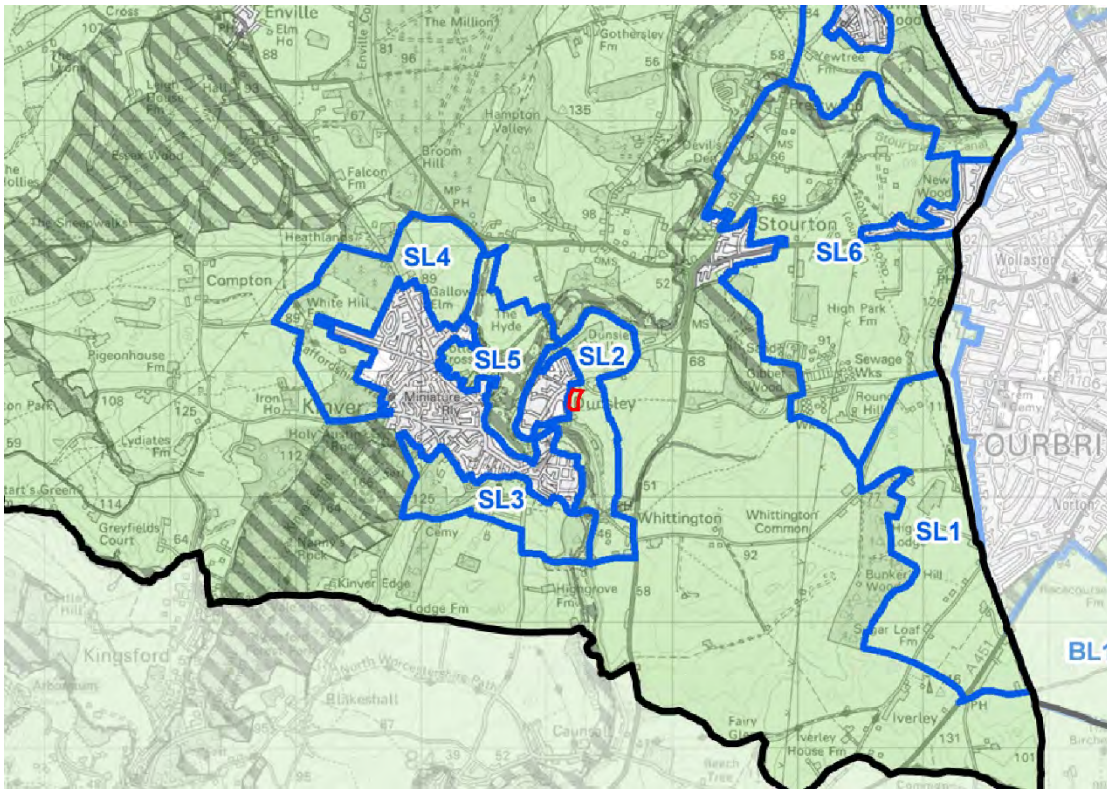


Image EDP 5.1: Extract from South Staffordshire District Council's South Staffordshire Landscape Sensitivity Assessment (Final Report, July 2019). The site is defined by a solid red line.

- 5.7 With reference to Table 4.1 of the sensitivity assessment, the land parcel SL2 has an overall quantum of nearly 75 hectares (ha), of which the site is less than 2ha and so is less than 2.5% of the overall land parcel. South Staffordshire District Council assess land parcel SL2 as having an overall landscape sensitivity of Moderate - High.
- 5.8 Within Chapter 3 of the sensitivity assessment, the rating of Moderate - High is not defined specifically. Instead, the report defines only Low, Moderate and High. Nonetheless, the report considers that the land parcel has a relatively high landscape sensitivity and susceptibility to change, as this land parcel has some distinct, if not strong, character and qualities.
- 5.9 With consideration of the published methodology for this study and our own field-based assessment during December 2019 and May 2024, it is considered that a site-specific assessment of the site would yield a lower landscape sensitivity than the wider land parcel for the following reasons:

1. The site has very limited features of value with previously extracted hedgerows replaced with timber post and wire fencing, limited native tree cover and poorly managed internal vegetation. The site's topography is probably the most interesting aspect. Consequently, the site makes a very limited, if any, contribution to the key characteristics of the landscape of the Sandstone Estatelands;
2. There are a number of landscape detractors discernible from the site, which are predominantly associated with the position of the site on the village edge of Kinver.
3. The perception of existing residential development enclosing the site to the north, south and western edges, which in some situations, overlooks the site's interior;
4. Landform continues to rise eastwards from the site towards a local ridgeline, which is situated within open countryside beyond the village settlement and within the typical "*mixed intensive arable and pasture farmland*" common to the Sandstone Estatelands LCA, see **Image EDP 5.2**, as well as **Section 2, Images EDP 2.4** and **2.8**;



Image EDP 5.2: View from within the site looking east towards the ridgeline outside of the site, beyond which landform falls easterly downwards to the Kidderminster/Wolverhampton Road (A449). Photograph taken at OSGR: SO 85187 83672 (during May 2024).

5. The combination of this local ridgeline, the settlement edge and road enclosing the site act as physical constraints. Consequently, these features limit and contain the site. The site is experienced as being within the settlement edge of Kinver, and its domestic land use and character. When on-site, especially in winter, one is aware of the presence of the surrounding village related land uses, albeit on the edge of the village rather

than feeling divorced from it, in the open countryside, like aspects of the wider land parcel SL2;

6. From a landscape and village character perspective, the domestic curtilages discernible from the site evidently contribute to the perception of the site as village edge (see **Section 2, Images EDP 2.3, 2.5 and 2.6**); and
 7. The wider land parcel SL2 is further divorced from the village and through its combination of elevated landform and mature woodland blocks along the course of the canal and around Horse Bridge Lane, the site is more related to the settlement edge than the wider open countryside of the land parcel. Hence, the wider land parcel is experienced as divorced and poorly related to Kinver.
- 5.10 EDP considers that the wider land parcel SL2 would be subject to a greater landscape sensitivity than those areas on the periphery of Kinver, such as the site. Consequently, given the above factors, it is concluded that the site has only a Moderate landscape sensitivity at most.

6 IMPLICATIONS FOR MASTERPLANNING

- 6.1 Any future development of the site should be informed by a Landscape and Visual Impact Assessment, the findings of which should help shape the scheme design. At this early stage, the preliminary landscape and visual appraisal has identified a series of key principles for the design of future development, which would assist in mitigating its landscape and visual effects and ensure it integrates effectively with the existing village form. These are:
- The existing external field boundaries of the site are weak, presenting an opportunity to establish new native hedgerows with tree planting, thus strengthening the landscape fabric of the site;
 - The site will drain naturally to the western edge, with the north-eastern corner being the lowest point. On this basis, the western edge of the site should be utilised for sustainable drainage attenuation features designed as attractive landscape components. This initiative has the potential to provide an attractive focal point in this part of the village, set within a compact 'village green' style open space. This would help connect the new development with the existing settlement;
 - The layout of the site should seek to work with and reflect the site topography;
 - There is an opportunity to create a central route which capitalises on new landscape fabric to aid the 'sense of place' of the development;
 - Existing dwellings to the northern edge (situated off Dunsley Lane) should be 'backed' with new development, but garden length and height of buildings should be carefully considered to try to mitigate effects on residential views and amenity;
 - Development should be stepped back from the southern boundary and carefully considered to try to mitigate effects on residential views and amenity on neighbouring dwellings; and

- Architectural proposals should seek to reflect the vernacular of the older parts of the village.

7 CONCLUSIONS

- 7.1 The site to the east of Dunsley Drive, Kinver lies immediately adjacent to the existing settlement edge, and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed. In elevated views from Holy Austin Rock, to the south of the village, the site is not visible. However, where the proposal might be discernible from elevated landform at Kinver Edge, the site appears to be on the existing edge of the settlement, and situated adjoining existing development and not situated on a prominent ridgeline where development may appear detached from the village and be incongruous.
- 7.2 Furthermore, as the site is sandwiched between existing development on the eastern edge of Dunsley Drive and inside, and below topographically, the extent of ribbon development along Dunsley Road, the development of the site would avoid any perception of 'sprawl' into the countryside beyond.
- 7.3 The following main matters have been identified within this Position Paper.

Relevant Designations:

- The site is situated within West Midlands Green Belt; however, the site does not lie within, or adjoin, any nationally or locally designated landscape; and
- Whilst there are a number of PRowS within the wider open countryside and adjoining the southern site edge, there is no public access into the site.

Visual Amenity:

- Visually, the site is enclosed through the combination of landform and mature landscape features in the open countryside surrounding the site. Additionally, the adjoining residential development sandwiches the site within built form, enclosing the site and limiting direct views from the adjoining village settlement;
- Views of the site are limited to the immediate geographical area to the western and north-western edge of the site, with no long-distance views identified. In addition, there are limited views available from Public Footpath Kinver 18 and 94 to the south-west of the site, which pass through open countryside. Furthermore, it is unlikely the development of the site is likely to be seen from Public Footpath Kinver 22a and 22b, which pass through a well treed valley landscape; and
- The site is overlooked by a number of residential dwellings, see **Section 2**. These receptors are perhaps the most sensitive receptors, though private views are not protected in policy terms. Residential amenity should be protected however and, as such, the scheme design should be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high-quality development in architectural terms.

Landscape Character:

- Heathy, wooded ridgeline, mature hedgerow oak trees within extensive hedgerows are characteristic of the landscape, but these features are not present within the site or its immediate setting. Therefore, there is an opportunity to strengthen local landscape character through new landscape planting, including new hedgerow and tree planting; and
- The site makes only a very limited contribution to the key characteristics of the LCA of Sandstone Estatelands, with typical landscape features appearing more intact in the wider open countryside surrounding Kinver village.

7.4 Overall, this Landscape Position Paper has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.

7.5 The over-arching landscape strategy should look to integrate the site with Kinver, incorporating the existing trees and hedgerows and facilitating green infrastructure through the site, breaking up the mass of the development and offering new recreation links.

7.6 In conclusion, the site to the east of Dunsley Drive, Kinver, lies immediately adjacent to the existing settlement and has the potential to appear as a well-integrated, contiguous area of the village if appropriately designed.

7.7 Subject to these considerations, further technical studies and development of a well-designed masterplan and landscape strategy, there is no in-principle reason to prevent development of the site in landscape and visual terms. In conclusion, therefore, this preliminary appraisal has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.



Bellway Homes Limited

Dunsley Drive, Kinver

Flood Risk Appraisal

LE20150- DD-LE-GEN-XX-RP-CE-FRA01-P1-Flood Risk Appraisal

May 2024





Bellway Homes Limited

Dunsley Drive, Kinver

Flood Risk Appraisal

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-P1-Flood Risk Appraisal

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Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

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CONTENTS

1	INTRODUCTION	1
1.1	Background	1
1.2	Site Location	1
1.3	Topography	1
1.4	Ground conditions	1
1.5	Watercourses	1
1.6	Drainage	2
1.7	Flood Zones and Vulnerability Classification	2
1.8	National Planning Flood Risk Policies Relevant to this Development	3
1.9	Local Policy Guidance	3
2	FLOOD RISK	8
2.1	Flood Risk from Rivers and Watercourses	8
2.2	Flooding from the Sea	8
2.3	Flooding from Land	8
2.4	Flooding from Groundwater	9
2.5	Flooding from Sewers	9
2.6	Flooding from Reservoirs, Canals and Other Artificial Sources	10
3	MITIGATION	11
3.1	Flood Risk Management	11
3.2	Residual Risks	11
4	PROPOSED DRAINAGE STRATEGY	12
4.1	Outfall Assessment	12
4.2	SuDS Assessment	12
4.3	Proposed Surface Water Drainage Strategy	13
4.4	Foul Water Drainage Strategy	14
5	DRAINAGE MANAGEMENT PLAN	15
5.1	Responsibility	15
5.2	Maintenance of Pipe Networks	15
5.3	Maintenance of SuDS Features	15
6	CONCLUSION	17
APPENDICES		
APPENDIX A – SITE LOCATION PLAN		
APPENDIX B – SEVERN TRENT WATER CORRESPONDENCE AND SEWER RECORDS		

Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDIX C – HYDRAULIC CALCULATIONS

1 INTRODUCTION

1.1 Background

- 1.1.1 Link was commissioned by Bellway Homes Limited to prepare a Flood Risk Appraisal (FRA) and associated Drainage Strategy in respect to a proposed development at Dunsley Drive, Kinver. This report has been prepared to support the promotion of the site for approximately 35 new homes through the emerging South Staffordshire Local Plan Review.
- 1.1.2 The exact number of dwellings that can be constructed depends on the extent of developable land on the site, which will be influenced by the flood risk posed to the site. A particular aim of this FRA is to inform this extent of developable land. The overall extent of the site is included in a site location plan provide in **Appendix A**.

1.2 Site Location

- 1.2.1 The site is located along the eastern edge of Dunsley Drive in Kinver, Staffordshire. The site is enclosed by Dunsley Drive to the west and Dunsley Road to the north.

1.3 Topography

- 1.3.1 The existing site level range has been found to range from approximately 77.3mAOD on its western edge to 79.9mAOD on its southern extent and generally falls in a north-westerly direction. The site consists primarily of empty field land with no distinguishing features or structures.

1.4 Ground conditions

- 1.4.1 A review of the British Geological Survey's geological mapping has been undertaken to determine the likely ground conditions on the site. Geological maps on the British Geological Survey online tools identify the Chester Formation as the bedrock geology, which consists of sandstone and conglomerate. No superficial deposits were recorded for this location.
- 1.4.2 Furthermore, publicly available boreholes in the proximity of the site have been reviewed. It should be noted that whilst there are records of borehole scans within a few hundred metres of the site, these lie on a different formation and thus are not representative of the ground conditions on site. A borehole scan taken on the same formation approximately 2km to the north of Dunsley Drive indicates a strata composition of red clays and cobbles to a depth of 1.5m, then a large stratum of soft red sandstone to a great depth (85m+).
- 1.4.3 Given the location of this borehole scan in relation to the site, it is recommended that a site investigation be carried out to determine the true ground conditions on site. As suggested by the Geological Survey and the borehole scan, the soil strata are likely to be granular in nature which could facilitate infiltration drainage for surface water. A site investigation and subsequent infiltration testing would need to be conducted in order to confirm this (see Section 4.1 for further details).

1.5 Watercourses

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

- 1.5.1 As part of this report, a review of the existing watercourses in close proximity to the site has been completed. The nearest watercourse is the River Stour, which encircles the site on its northern, western and southern edges. The river is located at 120m to the south of the site, approximately 380m to the west and north-west, and 440m to the north. Given the proximity of the River Stour to the proposed development, it is essential that the flood risk posed to the site by this body of water is assessed. This associated flood risk is discussed further in Section 1.7 and Section 2.1.

1.6 Drainage

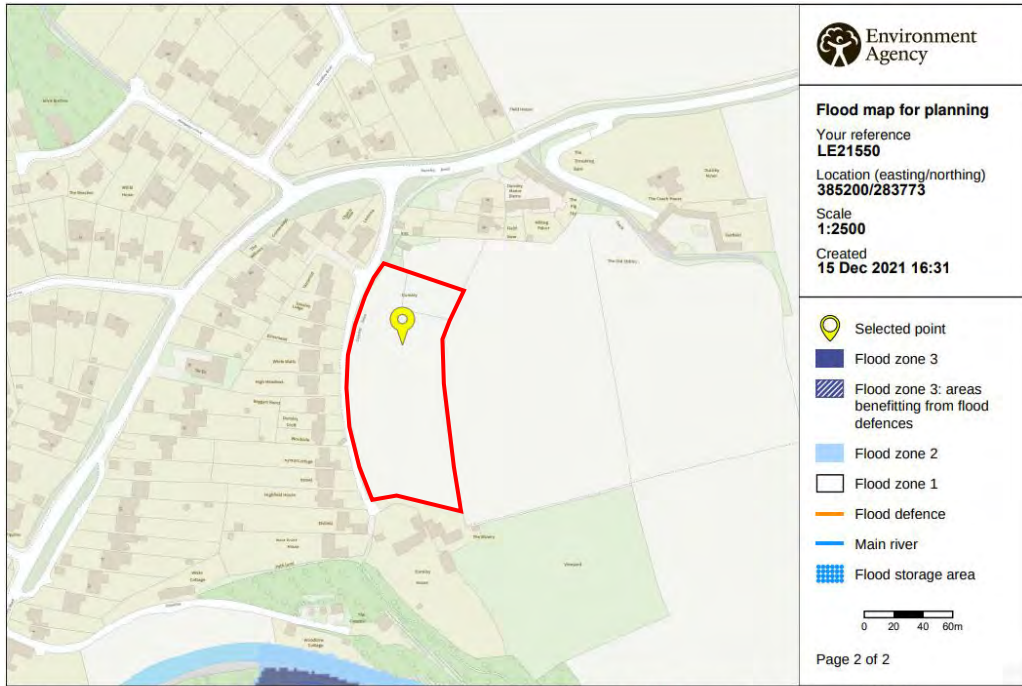
- 1.6.1 A developer's enquiry was submitted to Severn Trent Water (STW), the local water authority, to determine whether there are any existing sewers within or in the vicinity of the site. The correspondence and accompanying sewer record provided by STW is included in **Appendix B**, which indicates the presence of a single foul sewer in Dunsley Road to the north of the site, which follows the profile of the road and falls in a south-westerly direction.
- 1.6.2 It is anticipated that the foul drainage for this proposed development shall outfall into this existing sewer, given its proximity to the site. Since no surface water sewers have been identified in the vicinity of the site and the River Stour is at a minimum distance of 120m from the site, it is anticipated that the surface water strategy for the site shall outfall via infiltration drainage, as suggested in Section 1.4.

1.7 Flood Zones and Vulnerability Classification

- 1.7.1 The formal flood zone mapping approved by the government and prepared for use in the planning process, identifies areas potentially at risk of flooding from fluvial or tidal sources without taking into account the presence of flood defences or structures such as culverts or minor watercourses. An extract from the mapping is included in Figure 1 below; the yellow marker denotes the site location.

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal



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Figure 1: Flooding from Rivers and Watercourses

1.7.2 The formal flood zone mapping shows the site to be located entirely within Flood Zone 1, which implies an annual probability of flooding of less than 0.1% (corresponding to a 1 in 1000 year storm or less frequent), and therefore can be considered to be at a very low risk of flooding from nearby watercourses. Table 1 overleaf indicates what uses of land are appropriate for each flood zone, as set out within Table 3 – Flood risk vulnerability and flood zone ‘compatibility’ in the National Planning Policy Framework (NPPF). The proposed use would be defined as ‘More Vulnerable’, hence the proposed use is deemed acceptable.

	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test	✓	✓	✓
Zone 3a	Exception Test	✗	Exception Test	✓	✓
Zone 3b	Exception Test	✗	✗	✗	✓

Table 1 - Flood risk vulnerability and flood zone ‘compatibility’

1.8 National Planning Flood Risk Policies Relevant to this Development

1.8.1 The National Planning Policy Framework (NPPF) last revised by the Department of Communities and Local Government (DCLG) on 20th December 2023, took immediate effect on that date. The document Technical Guidance on the National Policy Framework (TGNPPF) also published by the Department of Communities and Local Government, has now been withdrawn and superseded by the Planning Practice Guidance (PPG), published on 6 March 2014.

1.8.2 The requirement for conducting an FRA as part of a planning application is set out in Footnote 59 on page 49 of the NPPF, which states:

“A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.”

1.8.3 Essential content of a site-specific FRA is explained in the PPG, paragraph 20 as follows:

“A site-specific flood risk assessment is carried out by (or on behalf of) a developer to assess the flood risk to and from a development site and should accompany a planning application where prescribed in footnote 55 of the National Planning Policy Framework. The assessment should demonstrate to the decision-maker how flood risk will be managed now and over the development’s lifetime, taking climate change into account, and with regard to the vulnerability of its users (see National Planning Policy Framework Annex 3 – Flood Risk Vulnerability).

“Developers can use the Environment Agency guidance on flood risk assessments when considering the scope of the assessment.

“The objectives of a site-specific flood risk assessment are to establish:

- whether a proposed development is likely to be affected by current or future flooding from any source;
- whether it will increase flood risk elsewhere;
- whether the measures proposed to deal with these effects and risks are appropriate;
- The evidence for the local planning authority to apply (if necessary) the Sequential Test, and;
- Whether the development will be safe and pass the Exception Test, if applicable.”

1.8.4 For certain types of flood sensitive development, NPPF describes how the Local Planning Authority (LPA) should check that the site proposed has the lowest frequency of flooding of those available for the development. This check is called the “Sequential Test.” All development that is identified in the LPA’s Local Development Framework Development Plan (LDFDP) has been Sequentially Tested using the LPA’s Strategic Flood Risk Assessment (SFRA). When a test is required, and the development is not identified in the Development Plan, NPPF advises that the site-specific FRA includes the Test. NPPF also requires that the FRA includes an “Exception Test” for flood sensitive development proposed in areas with high frequency of flooding. The reason is to demonstrate that flood risk will be safely managed for the lifetime of the development.

1.8.5 "Non-Statutory Technical Standards for Sustainable Drainage Systems" published by Department for Environment, Food and Rural Affairs in March 2015 sets out Government expectations for surface water drainage systems serving major developments to restrict discharges to green field rates. The standards do not address the quality of surface water discharges and state circumstances when the discharge rate can be higher than green field, up to the existing flow in the case of redevelopment of brown field sites.

1.9 Local Policy Guidance

1.9.1 The South Staffordshire local is current under review with the Publication Plan (Regulation 19) issued in April 2024 the key policy related to flood risk and drainage is NB7 : Managing flood risk, Sustainable urban Drainage Systems (SuDS) & water quality.

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

1. Managing flood risk

New development shall be located on Flood Zone 1 or areas with the lowest probability of flooding, taking climate change into account, and will not increase flood risk elsewhere. Any proposals for new development (except water compatible uses) within Flood Zones 2 and 3 will be required to provide sufficient evidence for the council to assess whether the requirements of the sequential test and exception test have been satisfied, taking climate change into account. Where development meets the sequential test in an area of higher flood risk, it must be designed to be flood resilient and safe for its users for the lifetime of the development, taking climate change and the vulnerability of any residents or users into account.

For developments within Flood Zones 2 and 3, and for developments elsewhere involving sites of 1ha or more, development proposals must be accompanied by a sitespecific Flood Risk Assessment which meets the requirements of the NPPF and Planning Practice Guidance. Flood Risk Assessments submitted must take into account an assessment of flood risk across the life of the development taking climate change into account in accordance with the latest Environment Agency guidance.

All more Vulnerable and Highly Vulnerable development within Flood Zone 2 and 3 should set finished floor levels 600mm above the known or modelled at 1% and 3.3% annual exceedance probability (AEP) flood level, including an allowance for climate change in accordance with the latest National guidance. All new development in Flood Zones 2 and 3 should not adversely affect flood routing or result in a net loss of flood storage capacity that would increase flood risk elsewhere.

For developments located in areas at risk of fluvial flooding, safe access/egress must be provided in the form of a safe dry route for people as a minimum and vehicles wherever possible.

Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements. Development should not take place over or within 8m of culverted watercourses.

Where it is not always possible to direct development to sites with the lowest probability of flooding, the development should seek to minimise risk to the site and make the development resistant to any residual risk and make the development flood resilient. Opportunities should also be sought to reduce the overall level of flood risk through the layout and form of development. Development should be designed to be safe throughout its lifetime, taking account of the potential impacts of climate change. Provision for emergency access and egress must also be included.

All developments should seek to provide wider betterment by demonstrating in site specific flood risk assessments and surface water drainage strategies (where required) what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes. The developer should consult with the relevant authority at the earliest opportunity

For all developments (excluding minor developments and change of use) proposed in Flood Zone 2 or 3, a Flood Warning and Evacuation Plan should be prepared. Where the development site would benefit from the construction of Flood Management Infrastructure such as Flood Alleviation Schemes, appropriate financial contributions will be sought.

2. Sustainable urban Drainage Systems (SuDS)

All new major development or developments involving large areas of hard standing (e.g. car parks) will incorporate SuDS appropriate to the nature of the site. Such systems shall provide optimum water runoff rates and volumes taking into account relevant local or national standards and the impact of the Water Framework Directive on flood risk issues, unless it can be clearly demonstrated that they are impracticable.

Sustainable drainage systems will be expected to reflect the design requirements and drainage hierarchy set out in the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook - February 2017, or subsequent updates.

SuDS design should be an integral part of the design and clear details of proposed SuDS together with how they will be managed and maintained will be required as part of any planning application.

Only proposals which clearly demonstrate that a satisfactory SuDS layout with appropriate maintenance is possible, or compelling justification as to why SuDS should not be incorporated into a scheme, or are unviable, are likely to be successful. SuDS systems should be designed to ensure that it can be accessed for maintenance and operation requirements and that ongoing maintenance costs are economically proportionate.

The dual use of land for SuDS and Open Space can be supported where neither use is compromised by the other. It may be supported in circumstances where land is safely usable by the public as open space and where SuDS will contribute towards an attractive and well landscaped environment where use as open space does not compromise the efficient and effective functioning of the SuDS in the short or longer term.

Discharge should not be made into the combined sewer system and early engagement by the developer with Severn Trent Water Ltd will be required to ensure sustainably drained development.

3. Water quality

Development should not adversely affect the quality or quantity of water, either directly through pollution of surface or ground water, or indirectly through the treatments of wastewater.

In order to protect and enhance water quality, all development proposals must demonstrate all of the following:

- a) There are adequate water supply, sewerage and land drainage systems (including water sources, water and wastewater infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. Where development is being phased, each phase must demonstrate sufficient water supply and wastewater conveyance, treatment and discharge capacity.*
- b) The quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality, including denaturalisation of river morphology, and ecology.*
- c) Appropriate consideration is given to sources of pollution, and appropriate SuDS measures incorporated to protect water quality from polluted surface water runoff.*

Foul drainage to a public sewer should be provided wherever possible, but where it is demonstrated that it is not feasible, alternative facilities must not pose unacceptable risk to water quality or quantity. Development proposals should be consistent with other Local Plan policies.

2 FLOOD RISK

2.1 Flood Risk from Rivers and Watercourses

2.1.1 As shown in Figure 1, the site is shown to be entirely within Flood Zone 1 and as such has a probability of flooding by rivers and watercourses of less than 0.1%. Therefore, the site is not considered to be at risk of flooding from rivers and watercourses.

2.2 Flooding from the Sea

2.2.1 The site is located within Kinver, at a minimum elevation above sea level of 77.3m and at a distance of 98.1km from the sea. Therefore, it can be concluded that the site is not at risk of flooding from the sea.

2.3 Flooding from Land

2.3.1 A source of flood risk to the site is from surface water flooding created by the site itself or adjacent areas. Based on the Surface Water Maps available, see Figure 2 below, the flood risk to the site and the nearby Dunsley Drive is very low from this particular source.

2.3.2 At the time of writing, a site masterplan (and corresponding proposed levels) is currently being developed and this FRA is being prepared to inform it, but it is anticipated that the levels on site are designed such that any potential overland flows generated by the site and the surrounding areas are directed towards the adjacent Dunsley Drive and away from the site.

2.3.3 Therefore, the proposed development will not be affected by surface water flooding and any potential overland flood flows.

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal



2.4 Flooding from Groundwater

2.4.1 The Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment (SFRA), adopted in October 2019 provides an overview of the groundwater flood risk in Southern Staffordshire. It notes there is very little evidence to suggest that groundwater flooding is a major problem in South Staffordshire and that the majority of the region is considered to be at low flood risk from this source. Furthermore, there are no references in the SFRA to historic flooding from groundwater in Kinver.

2.4.2 Therefore, it can be concluded that the proposed development is at low risk from flooding by groundwater.

2.5 Flooding from Sewers

2.5.1 Flooding can occur from other sources such as blocked drains and sewers. As mentioned previously in Section 1.6, there is a single foul sewer in the vicinity of the site within Dunsley Road as identified in the correspondence with STW in **Appendix B**. The site is located approximately 3m above Dunsley Road and as such would be protected from flooding caused by the failure of the foul sewer. Additionally, the foul sewer would be adopted by STW, and it can be safely assumed that it is regularly maintained by STW, therefore reducing the risk of flooding by this source. Therefore, the proposed development is at low risk from flooding by blocked drains and sewers.

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

2.6 Flooding from Reservoirs, Canals and Other Artificial Sources

2.6.1 The reservoir flood map shown in Figure 3 shows the extent of flooding should a canal, reservoir, or other artificial source breach upstream of the development. This shows that the site would not be at risk of flooding from this source and as such this source of flooding is not considered a risk.

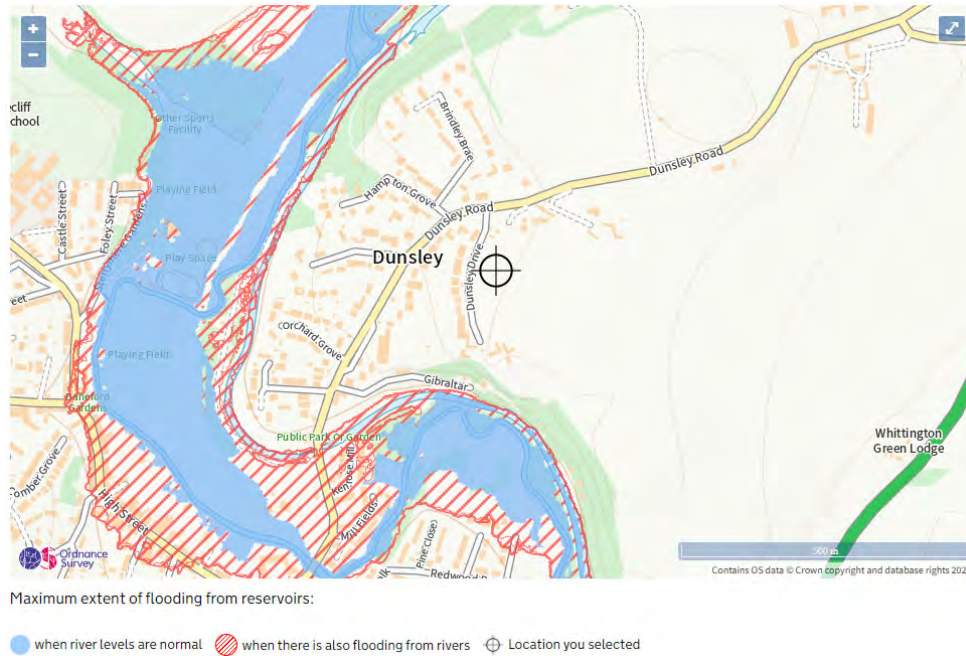


Figure 3: Flooding from Reservoirs

3 MITIGATION

3.1 Flood Risk Management

3.1.1 It is recommended that the following flood risk management measures are considered to mitigate the risks identified above:

- The development finished floor levels are set above the existing levels and at least 150mm above the proposed surrounding external levels.
- Wherever possible, the external ground profile in the development will ensure that surface water is directed away from the residential dwellings.
- The proposed development incorporates a positive surface water drainage system, (elaborated on in Section 4), which will intercept runoff from roofs and paved areas before discharging flows into the underlying geology using infiltration SuDS techniques at a rate no higher than the existing infiltration rate.

3.2 Residual Risks

3.2.1 Residual risks are the risks that remain once the flood risk management measures described above have been implemented. These are typically associated with extreme events that overwhelm drainage systems exceeding the flood levels used to design any mitigation measures. The primary residual risks that will affect this development are:

- An extreme rainfall event which exceeds the capacity of the proposed surface water drainage system to both intercept and convey the flows. During such an event, water that is unable to enter the formal drainage system will flow over the ground through the development. The risk can be reduced by designing site levels to direct any runoff towards the highways or other corridors running through the site.
- A rainfall event that exceeds the capacity of surrounding off-site drainage networks could also result in runoff entering the site via routes other than the highways.

4 PROPOSED DRAINAGE STRATEGY

4.1 Outfall Assessment

4.1.1 As required by Part H of Building Regulations and the paragraph 7-080 in Planning Policy Guidance of the NPPF, the required Drainage Hierarchy has been considered in the development of this strategy as summarised below.

Outfall Option	Available Option	Comment
Infiltration Drainage	✓	The use of infiltration outfall is proposed due to the anticipated permeable geology on site, the location of the site within Flood Zone 1 and the apparent absence of groundwater related issues.
Watercourse	n/a	The nearest watercourse, the River Stour is at a great distance of >120m from the site and thus is not a viable option.
Surface Water Sewer	n/a	Not considered. None exist in the vicinity of the site.
Combined Sewer	n/a	Not considered. None exist in the vicinity of the site.

Table 2 – Outfall Assessment

4.1.2 A suitable discharge consent will need to be agreed with the approving body by the contractor prior to completing the connection to the watercourse.

4.2 SuDS Assessment

4.2.1 As part of the surface water drainage strategy for the site a number of Sustainable Drainage Systems were considered. Table 3 below provides a list of the options considered and a justification for their inclusion or omission.

SuDS System	Used	Justification
Rainwater Harvesting System	Yes	The use of rainwater harvesting in the form of water butts should be considered
Green Roofs	No	Green roofs have not been proposed for this site as there is insufficient access to roof areas for maintenance and as such the system could not be effectively maintained to ensure long term performance.
Infiltration Systems	Yes	The use of soakaways are feasible on this site due the anticipated geology.

Dunsley Drive, Kinvor

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

SuDS System	Used	Justification
Proprietary Treatment Systems	No	The use of proprietary treatment systems are not considered economically viable or required on this site considering installation and operational costs.
Filter Strips	Yes	Filter strips could be considered part of the site development layout
Filter Drains	Yes	Filter Drains could be considered part of the site development layout
Swales	Yes	Swales could be considered part of the site development layout
Bioretention Systems	Yes	Bioretention Systems could be considered part of the site development layout
Porous Pavements	Yes	Porous paving could potentially be employed to treat the most likely source of site contaminates from the residential parking bays and/or private roads. All surface works from the parking areas shall drain via a voided sub-base offering the required treatment. The available storage within the voided sub-base shall provide the required interception.
Attenuation Storage Tanks (oversized pipes)	No	Infiltration basin to be provided
Detention Basins	No	Infiltration basin to be provided
Ponds and Wetlands	No	Infiltration basin to be provided

Table 3 – SuDS Assessment

- 4.2.2 This site will be promoted through emerging Local Plan Review seeking its release from Green Belt and proposed allocation for residential development. It is proposed that suitable features will be provided to support both flood risk and water quality as defined by industry standards and local policies.
- 4.2.3 The outline proposals for the drainage system include private storm and foul pipes combined with infiltration systems such as soakaways and porous paving.

4.3 Proposed Surface Water Drainage Strategy

- 4.3.1 It is anticipated that a new drainage system will comprise gutters, down pipes channels, gullies, pipes, and infiltration systems such as soakaways and porous paving. These drainage features will collect runoff from hardstanding areas such as roofs, roads and car parking, before outfalling via infiltration into the surrounding geology by means of soakaways.
- 4.3.2 In accordance with Core Policy 3: Sustainable Development and Climate Change and the Strategic Flood Risk Assessment for the area, it is proposed that the infiltration system is designed for a 100 year storm plus 40% allowance for climate change. As mentioned previously, at the time of writing a masterplan for the site is being prepared with this report informing the masterplan and a site investigation to determine the soil composition and properties has not been undertaken. Therefore, for the purposes of design it has been assumed that the percentage impermeability of the site is 65% and the design infiltration rate is $1 \times 10^{-5} \text{m/s}$

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

(0.036m/hr). This design infiltration rate is recommended for loamy soils (assumed for the sandstone bedrock identified in Section 1.4) in Table 25.1 in the SuDS Manual C753. Furthermore, the required total cellular storage volume for the soakaway(s) on site has been found to be approximately 520m³. A calculation extract for this required volume and proposed infiltration rate is included in **Appendix C**, which demonstrates the system's performance.

4.4 Foul Water Drainage Strategy

- 4.4.1 In order to establish a foul outfall a developer enquiry was made to STW, the local water authority. As mentioned previously in Section 1.6, there is an existing foul sewer within Dunsley Road which falls in a south-westerly direction. The response to this developer enquiry application confirmed that this foul sewer has sufficient capacity to accept the foul flows from the proposed development and STW would be willing to accept a connection to their network at a preferred location subject to a formal S106 application being made ahead of connection. STW have recommended a connection into Manhole Ref: SO85831803, located to the north west of the site in Dunsley Road, as shown on the STW sewer map included in **Appendix B**.
- 4.4.2 The foul drainage strategy for the site is to convey all foul flows from the development to the proposed connection point in Manhole Ref SO85831803. As discussed above, STW agree with the principal of this connection subject to a formal S106 application. However, if a connection into this manhole is not feasible, a lateral connection into the foul pipe immediately upstream of it may need to be considered.

5 Drainage Management Plan

5.1 Responsibility

5.1.1 For all drainage elements that will be private, the maintenance responsibility shall be with the developer, or a nominated third party, where private assets serve multiple properties. The maintenance requirements are outlined below.

5.2 Maintenance of Pipe Networks

5.2.1 Maintenance and management of main storm sewers and chambers inclusive of pipework from paved areas and buildings (but excluding internal building drainage) should be visually inspected and jetted/cleaned as required. As a minimum, this should be carried out every 5 years. Methods of inspection to give indications of blockages etc. may include:

- Pulling a mandrel through the pipe to identify physical faults (e.g. disjointed pipes).
- Flushing/jetting.
- CCTV.
- Measurement of water depths in pipe entries, catchpits or interceptors along a drain run may identify potentially blocked pipes.

5.2.2 Gully gratings, manhole gratings and channel gratings shall be visually inspected at least once every year and replaced or re-set if damaged or dislodged. Gullies should be inspected at least once every year, ideally during spring time as the autumn and winter seasons produce the most detritus build up in the form of leaves, litter and silt. This material should be removed from the channels and disposed of at a licensed tip. This material should not be tipped in other areas of the development as it may pose a pollution threat to the surrounding drainage system.

5.2.3 Jetting should only be carried out after removal of the silt and debris, as jetting alone will simply wash the debris further downstream without removing the problem.

5.3 Maintenance of SuDS Features

5.3.1 The regular and correct maintenance of the SuDS feature is essential to the continued performance. The SuDS Manual C753 provides advice on the management of the system. The recommended maintenance

regimes for the soakaways and porous paving are given in Table 13.1 and Table 20.15 in the SuDS Manual C753 respectively, which will form the basis of the strategy for the provided development.

Maintenance schedule	Required action	Typical frequency
Regular maintenance	Inspect for sediment and debris in pre-treatment components and floor of inspection tube or chamber and inside of concrete manhole rings	Annually
	Cleaning of gutters and any filters on downpipes	Annually (or as required based on inspections)
	Trimming any roots that may be causing blockages	Annually (or as required)
Occasional maintenance	Remove sediment and debris from pre-treatment components and floor of inspection tube or chamber and inside of concrete manhole rings	As required, based on inspections
Remedial actions	Reconstruct soakaway and/or replace or clean void fill, if performance deteriorates or failure occurs	As required
	Replacement of clogged geotextile (will require reconstruction of soakaway)	As required
Monitoring	Inspect silt traps and note rate of sediment accumulation	Monthly in the first year and then annually
	Check soakaway to ensure emptying is occurring	Annually

Table 5 – Table 13.1 of CIRIA 753

Maintenance schedule	Required action	Typical frequency
Regular maintenance	Brushing and vacuuming (standard cosmetic sweep over whole surface)	Once a year, after autumn leaf fall, or reduced frequency as required, based on site-specific observations of clogging or manufacturer's recommendations – pay particular attention to areas where water runs onto pervious surface from adjacent impermeable areas as this area is most likely to collect the most sediment
Occasional maintenance	Stabilise and mow contributing and adjacent areas	As required
	Removal of weeds or management using glyphosate applied directly into the weeds by an applicator rather than spraying	As required – once per year on less frequently used pavements
Remedial Actions	Remediate any landscaping which, through vegetation maintenance or soil slip, has been raised to within 50 mm of the level of the paving	As required
	Remedial work to any depressions, rutting and cracked or broken blocks considered detrimental to the structural performance or a hazard to users, and replace lost jointing material	As required
	Rehabilitation of surface and upper substructure by remedial sweeping	Every 10 to 15 years or as required (if infiltration performance is reduced due to significant clogging)
Monitoring	Initial inspection	Monthly for three months after installation
	Inspect for evidence of poor operation and/or weed growth – if required, take remedial action	Three-monthly, 48 h after large storms in first six months
	Inspect silt accumulation rates and establish appropriate brushing frequencies	Annually
	Monitor inspection chambers	Annually

Table 6 – Table 20.15 of CIRIA 753

5.3.2 It should be noted that maintenance regimes detailed above are initial recommendations and the actual maintenance work undertaken should be adapted to suit the system performance by the maintenance provider.

6 CONCLUSION

- 6.1.1 This site specific Flood Risk Appraisal has been prepared in accordance with NPPF guidance and local policy on Flood Risk. The government approved flood mapping shows the site to be located entirely within Flood Zone 1 and as such is at a very low risk from flood risk from both fluvial and pluvial sources on the site. Further to this, the proposed levels on the site shall be set such that in the unlikely event of these systems failing the development on the site will remain protected.
- 6.1.2 The drainage strategy demonstrated that an appropriate drainage system for both foul and surface water can be provided on the site which discharges to a suitable outfall. Subject to the mitigation measures proposed, the development may proceed without being subject to significant flood risk. Moreover, the development will not significantly increase flood risk to the wider catchment area.

APPENDICES



APPENDIX A – Site Location Plan





GENERAL NOTES

1. THIS DRAWING SHOULD NOT BE REPRODUCED IN WHOLE OR PART WITHOUT THE WRITTEN CONSENT OF LINK ENGINEERING.
2. DO NOT SCALE FROM THIS DRAWING. UNITS ARE IN METRES UNLESS OTHERWISE SPECIFIED.
3. THE CONTRACTOR IS TO CHECK ALL INFORMATION PROVIDED PRIOR TO COMMENCING WORKS AND SEEK CLARIFICATION FROM THE ENGINEER IN RESPECT TO ANY AMBIGUITIES FOUND.
4. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER SCHEME SPECIFIC DRAWINGS.

KEY

— DEVELOPMENT BOUNDARY

Rev.	Amendments	Date	By
-	INITIAL ISSUE	05.01.22	WJT

Client			
			
 <small>Find us @ www.linkeng.co.uk</small>			
Project			
LE21550 - DUNSLEY DRIVE, KINVER			
Drawing			
LOCATION PLAN			
Scale @ A1	Drawn	Checked	Rev
1:1000	WJT	KL	-



PROJECT INFORMATION (S2)

Bellway Homes Limited

Dunsley Drive, Kinver

LE21550 – DD-LE-GEN-XX-RP-CE-FRA01-Flood Risk Appraisal

APPENDIX B – Severn Trent Water Correspondence and Sewer Records

WONDERFUL ON TAP



Link Engineering
145 LOMBARD HOUSE
GREAT CHARLES STREET
QUEENSWAY
BIRMINGHAM
B3 3LP

Severn Trent Water Ltd
Leicester Water Centre
Gorse Hill
Anstey
Leicester
LE7 7GU

Tel: 0345 266 7930
www.stwater.co.uk

Email:
Network.Solutions@SevernTrent.co.uk

Our ref: 1023952

FAO: James Hall

6th December 2021

Dear Sir/Madam,

Proposed Development: (30 dwellings) 3 Land off Dunsley Drive, Kinver, Staffordshire, DY7 6NB - 385162, 283759

I refer to your 8Development Enquiry Request9 in respect of the above named site. Please find enclosed the sewer records that are included in the fee together with the Supplementary Guidance Notes (SGN) which refer to surface water disposal from development sites.

Protective Strip

No Public sewers within site boundary.

Due to a change in legislation on 1 October 2011 there may be former private sewers on the site which have transferred to the responsibility of Severn Trent Water Ltd, which are not shown on the statutory sewer records, but are located in your client9s land. These sewers would require protective strips of 3 metres either side of the sewer9s centreline that we will not allow to be built over. If such sewers are identified to be present on the site, please contact us for further guidance.

Foul Water Drainage

Records show closest public sewers are to the north of site boundary, MH SO85831803. Foul flows generated from 40

dwellings around .41 l/s (2xDWF) will have little impact and can be accommodated in the foul network. A gravity connection is therefore acceptable subject to S106 submission.

Note , if the site is requires a pump solution then modelling will be required to understand wider impact to downstream network.

Surface Water Drainage

Under the terms of Section H of the Building Regulations 2000, the disposal of surface water by means of soakaways should be considered as the primary method. If these are found to be unsuitable, satisfactory evidence will need to be submitted. The evidence should be either percolation test results or by the submission of a statement from the SI consultant (extract or a supplementary letter).

Note, STW will not allow surface water discharge to the foul network.

Subject to above, Severn Trent Water expects all surface water from the development to be drained in a sustainable way to the nearest watercourse or land drainage channel, subject to the developer discussing all aspects of the developments surface water drainage with the Local Lead Flood Authority (LLFA). Any discharge rate to a watercourse or drainage ditch will be determined by the LLFA / EA.

Connections

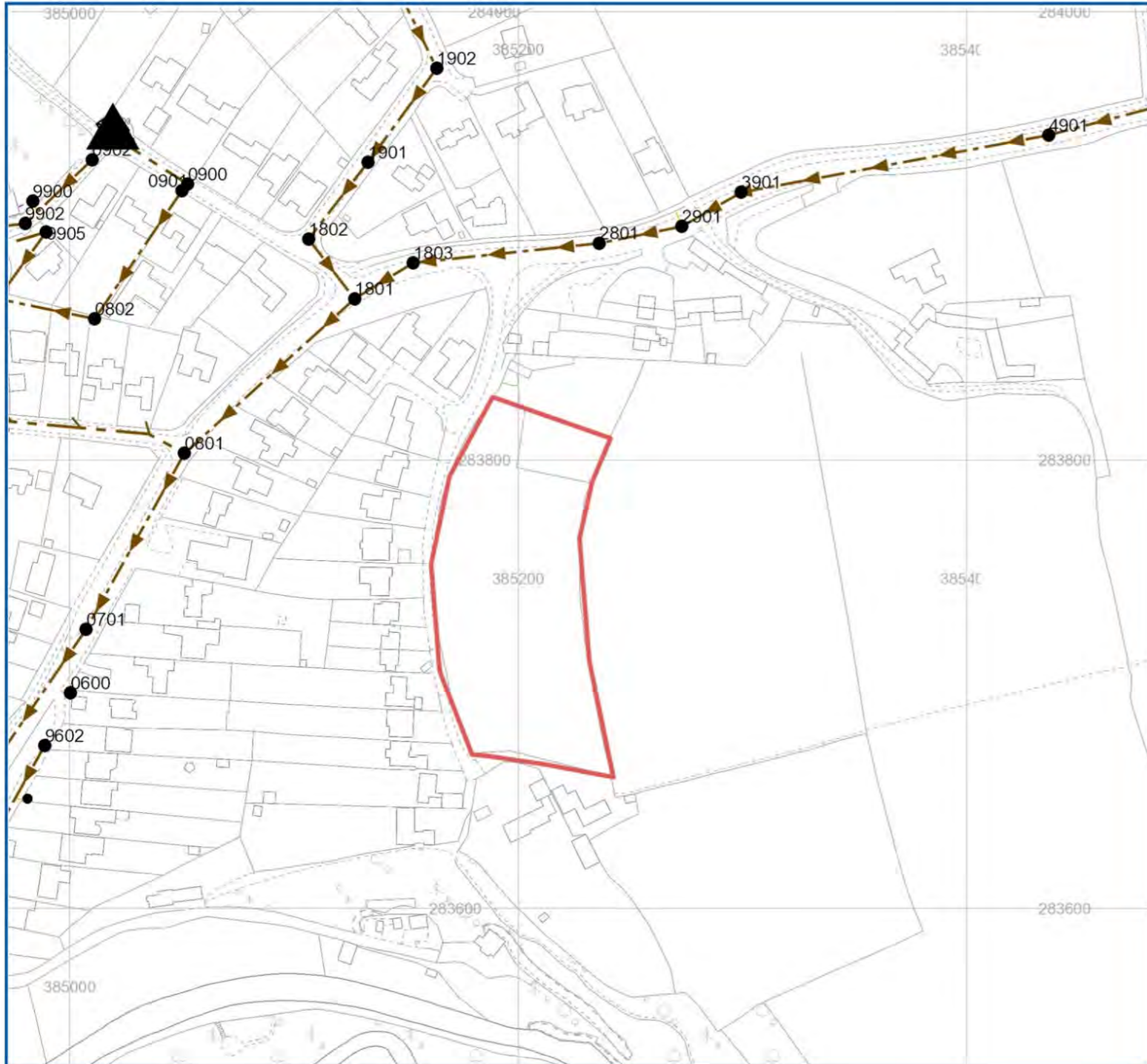
For any new connections (including the re-use of existing connections) to the public sewerage system, the developer will need to submit a Section 106 application form. Our Developer Services department are responsible for handling all new connections enquiries and applications. To contact them for an application form and associated guidance notes please call 0800 7076600 or download from www.stwater.co.uk.

Please quote the above reference in any future correspondence (including e-mails) with STW Limited. Please note that Developer Enquiry responses are only valid for 6 months from the date of this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Belal Ali', is centered below the text 'Yours sincerely'. The signature is fluid and cursive, with a small dot at the end of the final stroke.

Belal Ali
Network Solutions
Developer Services



Reference	Cover Level	Invert Level Upstream	Invert Level Downstream	Purpose	Material	Pipe Shape	Max Size	Min Size	Gradient	Year Laid
SO84839905	<UNK>	<UNK>	64.3	F	<UNK>	<UNK>	<UNK>	<UNK>	0	31/12/1899 00:00:00
SO85830802	65	<UNK>	64.3	F	VC	C	150	<UNK>	0	31/12/1899 00:00:00
SO85831802	71.46	70.25	69.37	F	VC	C	<UNK>	<UNK>	34.35	31/12/1899 00:00:00
SO85830901	69.41	68.14	<UNK>	F	VC	C	150	<UNK>	0	31/12/1899 00:00:00
SO85831902	77.68	72.58	71.8	F	VC	C	<UNK>	<UNK>	66.92	31/12/1899 00:00:00
SO85831901	74.48	71.79	70.26	F	VC	C	<UNK>	<UNK>	27.97	31/12/1899 00:00:00
SO85830902	70	68.47	73.54	F	VC	C	<UNK>	<UNK>	<UNK>	31/12/1899 00:00:00
SO85833901	79.73	77.99	76.54	F	VC	C	225	<UNK>	20.7	31/12/1899 00:00:00
SO85832901	78.5199	76.53	74.91	F	VC	C	225	<UNK>	23.97	31/12/1899 00:00:00
SO85834901	86.44	83.86	78	F	VC	C	225	<UNK>	23.6	31/12/1899 00:00:00
SO85830701	63.69	61.78	56.17	F	VC	C	<UNK>	<UNK>	15.38	31/12/1899 00:00:00
SO84839902	76	73.53	71.48	F	VC	C	<UNK>	<UNK>	20.15	31/12/1899 00:00:00
SO85831803	72.55	70.8	69.31	F	VC	C	225	<UNK>	21.61	31/12/1899 00:00:00
SO85832801	76.66	74.9	70.85	F	VC	C	225	<UNK>	20.86	31/12/1899 00:00:00
SO85830801	67.49	65.54	61.79	F	VC	C	<UNK>	<UNK>	23.75	31/12/1899 00:00:00
SO84839602	63.51	62.25	56.56	F	VC	C	<UNK>	<UNK>	12.84	31/12/1899 00:00:00
SO85831801	71.1299	69.29	65.55	F	VC	C	<UNK>	<UNK>	26.85	31/12/1899 00:00:00
SO84839900	<UNK>	<UNK>	<UNK>	F	VC	U	150	<UNK>	<UNK>	31/12/1899 00:00:00
<UNK>	<UNK>	<UNK>	<UNK>	F	VC	<UNK>	<UNK>	<UNK>	<UNK>	31/12/1899 00:00:00

LEGEND

Ancillary

- Balancing Lagoon
- Grease Trap
- Interceptor
- Screen
- Chamber
- Flushing Chamber
- Scalway
- Overflow
- Fitting
- Blind Shaft
- Facility Connector
- Head Node
- Lamphole
- Sewerage Air Valve
- Sewerage Chemical Injection Point
- Sewerage Hatch Box
- Sewerage Pressure Washout
- Vent Column
- Waste Water Outfall
- Control Valve
- Hydrobrake
- Penstock

Manhole

- Foul Bifurcation Manhole
- Combined Bifurcation Manhole
- Surface Water Bifurcation Manhole
- Dual Manhole
- Foul Single Manhole
- Combined Single Manhole
- Surface Water Single Manhole
- Twin Manhole
- Foul Adopted Manhole
- Combined Adopted Manhole
- Surface Adopted Manhole
- Transfered Manhole
- Unsurveyed Manhole

Storage

- Disposal Site
- Off-Line Waste Water Storage
- On-Line Waste Water Storage
- Weir Well

Waste Water Process Structure

- Sewage Treatment Point
- Sewage Treatment Structure
- Sludge Treatment Point
- Sludge Treatment Structure

Gravty Sewer Pipe

- Foul Gravity Sewer
- Combined Gravity Sewer
- Surface Water Gravity Sewer
- S104 Surface Water Gravity Sewer
- S104 Combined Gravity Sewer
- S104 Foul Gravity Sewer
- Private Surface Water Gravity Sewer
- Private Combined Gravity Sewer

- Private Foul Gravity Sewer
- Surface Water Unsurveyed Pipe
- Combined Unsurveyed Pipe
- Foul Unsurveyed Pipe
- Transfered Surface Water Sewer
- Transfered Combined Sewer
- Transfered Foul Sewer
- Disposal Pipe
- Overflow Pipe
- Culverted Water Course
- Waste Internal Site Pipe
- Sewer Service Connection
- Gravty Sewer Others
- Pressure Sewer Pipe
- Surface Water Pressure Sewer
- Combined Pressure Sewer
- Foul Pressure Sewer
- S104 Surface Water Pressure Sewer
- S104 Combined Pressure Sewer
- S104 Foul Pressure Sewer
- Private Surface Water Pressure Sewer
- Private Combined Pressure Sewer
- Private Foul Pressure Sewer
- Service Pipe

- Surface Water Vacuum Sewer
- Foul Vacuum Sewer
- Combined Vacuum Sewer
- S104 Surface Water Vacuum Sewer
- S104 Combined Vacuum Sewer
- S104 Foul Vacuum Sewer
- Private Surface Water Vacuum Sewer
- Private Combined Vacuum Sewer
- Private Foul Vacuum Sewer
- Surface Water Siphon
- Combined Siphon
- Foul Siphon
- Private Surface Water Siphon
- Private Combined Siphon
- Private Foul Siphon
- S104 Surface Water Siphon
- S104 Combined Siphon
- S104 Foul Siphon
- Surface Water Unsurveyed Pipe
- Combined Unsurveyed Pipe
- Foul Unsurveyed Pipe
- Disposal Pipe

- Surface Water Lateral Drain
- Combined Lateral Drain
- Foul Lateral Drain
- S104 Surface Water Lateral Drain
- S104 Combined Lateral Drain
- S104 Foul Lateral Drain
- Private Surface Water Lateral Drain
- Private Combined Lateral Drain
- Private Foul Lateral Drain
- Transfered Surface Water Lateral Drain
- Transfered Combined Lateral Drain
- Transfered Foul Lateral Drain
- Print200mLine

MATERIALS

- NONE
- AC - ASBESTOS CEME
- BR - BRICK
- CC - CONCRETE BOX CULVERT
- CI - CAST IRON
- CO - CONCRETE
- CSB - CONCRETE SEGMENTS (BOLTED)
- CSU - CONCRETE SEGMENTS (UNBOLTED)
- DI - DUCTILE IRON
- GRP - GLASS REINFORCED PLASTIC
- MAC - MASONRY IN REGULAR COURSES
- MAR - MASONRY RANDOMLY COURSED
- PE - POLYETHYLENE
- PF - PITCH
- PP - POLYPROPYLENE
- PSC - PLASTIC STEEL COMPOSITE
- PVC - POLYVINYL CHLORIDE
- RPM - REINFORCED PLASTIC MATRIX
- SI - SPUN (GREY) IRON
- ST - STEEL
- U - UNKNOWN
- VC - VITRIFIED CLAY
- XXX - OTHER

CATEGORIES

- W - WEIR
- C - CASCADE
- DB - DAMBOARD
- SE - SIDE ENTRY
- FV - FLAP VALVE
- BD - BACK DROP
- S - SIPHON
- D - HIGHWAY DRAIN
- S104 - SECTION 104

SHAPE

- C - CIRCULAR
- E - EGG SHAPED
- O - OTHER
- R - RECTANGLE
- S - SQUARE
- T - TRAPEZOIDAL
- U - UNKNOWN

PURPOSE

- C - COMBINED
- E - FINAL EFFLUENT
- F - FOUL
- L - SLUDGE
- S - SURFACE WATER



Severn Trent Water Limited
 Asset Data Management
 PO Box 5344
 Coventry
 CV3 9FT
 Telephone: 0345 601 6616

SEWER RECORD (Tabular)

O/S Map Scale: 1:2,500
 Date of Issue: 06-12-21
 This map is centred upon:
 X: 385227.07 Y: 283766.10

Disclaimer Statement

1 Do not scale off this Map.

2 This plan and any information supplied with it is furnished as a general guide, is only valid at the date of issue and no warranty as to its correctness is given or implied. In particular this plan and any information shown on it must not be relied upon in the event of any development or works (including but not limited to excavations) in the vicinity of SEVERN TRENT WATER assets or for the purposes of determining the suitability of a point of connection to the sewerage or distribution systems.


3 On 1 October 2011 most private sewers and private lateral drains in Severn Trent Water's sewerage area, which were connected to a public sewer as at 1 July 2011, transferred to the ownership of Severn Trent Water and became public sewers and public lateral drains. A further transfer takes place on 1 October 2012. Private pumping stations, which form part of these sewers or lateral drains, will transfer to ownership of Severn Trent Water on or before 1 October 2016. Severn Trent Water does not possess complete records of these assets. These assets may not be displayed on the map.

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APPENDIX C – Hydraulic Calculations


Link Engineering		Page 1
Lombard House 145 Great Charles Street Birmingham, B3 3LP	Dunsley Drive Kinver	
Date 04/01/2022 15:30 File	Designed by WJT Checked by KL	
Innovyze	Source Control 2018.1.1	

Summary of Results for 100 year Return Period (+40%)

Half Drain Time : 1516 minutes.

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m ³)	Status
15 min Summer	0.342	0.342	2.8	178.8	O K
30 min Summer	0.448	0.448	2.8	234.1	O K
60 min Summer	0.556	0.556	2.8	290.4	O K
120 min Summer	0.661	0.661	2.8	345.2	O K
180 min Summer	0.717	0.717	2.8	374.4	O K
240 min Summer	0.751	0.751	2.8	392.5	O K
360 min Summer	0.790	0.790	2.8	412.5	O K
480 min Summer	0.811	0.811	2.8	423.9	O K
600 min Summer	0.822	0.822	2.8	429.6	O K
720 min Summer	0.826	0.826	2.8	431.7	O K
960 min Summer	0.821	0.821	2.8	428.8	O K
1440 min Summer	0.785	0.785	2.8	410.3	O K


Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Time-Peak (mins)
15 min Summer	130.597	0.0	27
30 min Summer	85.825	0.0	41
60 min Summer	53.779	0.0	70
120 min Summer	32.595	0.0	130
180 min Summer	24.012	0.0	190
240 min Summer	19.224	0.0	248
360 min Summer	13.954	0.0	368
480 min Summer	11.125	0.0	486
600 min Summer	9.325	0.0	604
720 min Summer	8.069	0.0	724
960 min Summer	6.417	0.0	962
1440 min Summer	4.640	0.0	1262

Link Engineering		Page 2
Lombard House 145 Great Charles Street Birmingham, B3 3LP	Dunsley Drive Kinver	
Date 04/01/2022 15:30 File	Designed by WJT Checked by KL	
Innovyze	Source Control 2018.1.1	

Summary of Results for 100 year Return Period (+40%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m ³)	Status
2160 min Summer	0.735	0.735	2.8	383.8	O K
2880 min Summer	0.690	0.690	2.8	360.8	O K
4320 min Summer	0.610	0.610	2.8	318.5	O K
5760 min Summer	0.535	0.535	2.8	279.4	O K
7200 min Summer	0.465	0.465	2.8	242.9	O K
8640 min Summer	0.400	0.400	2.8	209.1	O K
10080 min Summer	0.341	0.341	2.8	178.0	O K
15 min Winter	0.384	0.384	2.8	200.6	O K
30 min Winter	0.503	0.503	2.8	262.8	O K
60 min Winter	0.625	0.625	2.8	326.5	O K
120 min Winter	0.745	0.745	2.8	389.1	O K
180 min Winter	0.810	0.810	2.8	423.0	O K
240 min Winter	0.851	0.851	2.8	444.5	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Time-Peak (mins)
2160 min Summer	3.350	0.0	1628
2880 min Summer	2.656	0.0	2020
4320 min Summer	1.912	0.0	2816
5760 min Summer	1.513	0.0	3632
7200 min Summer	1.261	0.0	4400
8640 min Summer	1.086	0.0	5192
10080 min Summer	0.957	0.0	5944
15 min Winter	130.597	0.0	26
30 min Winter	85.825	0.0	41
60 min Winter	53.779	0.0	70
120 min Winter	32.595	0.0	128
180 min Winter	24.012	0.0	186
240 min Winter	19.224	0.0	244

Link Engineering		Page 3
Lombard House 145 Great Charles Street Birmingham, B3 3LP	Dunsley Drive Kinver	
Date 04/01/2022 15:30 File	Designed by WJT Checked by KL	
Innovyze	Source Control 2018.1.1	

Summary of Results for 100 year Return Period (+40%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Volume (m ³)	Status
360 min Winter	0.899	0.899	2.8	469.5	O K
480 min Winter	0.928	0.928	2.8	484.7	O K
600 min Winter	0.944	0.944	2.8	493.5	O K
720 min Winter	0.953	0.953	2.8	498.2	O K
960 min Winter	0.956	0.956	2.8	499.7	O K
1440 min Winter	0.929	0.929	2.8	485.6	O K
2160 min Winter	0.862	0.862	2.8	450.4	O K
2880 min Winter	0.803	0.803	2.8	419.8	O K
4320 min Winter	0.686	0.686	2.8	358.3	O K
5760 min Winter	0.572	0.572	2.8	298.9	O K
7200 min Winter	0.466	0.466	2.8	243.3	O K
8640 min Winter	0.369	0.369	2.8	192.6	O K
10080 min Winter	0.282	0.282	2.8	147.3	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Time-Peak (mins)
360 min Winter	13.954	0.0	362
480 min Winter	11.125	0.0	478
600 min Winter	9.325	0.0	594
720 min Winter	8.069	0.0	708
960 min Winter	6.417	0.0	936
1440 min Winter	4.640	0.0	1374
2160 min Winter	3.350	0.0	1740
2880 min Winter	2.656	0.0	2192
4320 min Winter	1.912	0.0	3076
5760 min Winter	1.513	0.0	3928
7200 min Winter	1.261	0.0	4760
8640 min Winter	1.086	0.0	5528
10080 min Winter	0.957	0.0	6248

Appendix 6: Counsel Advice Note

**IN THE MATTER OF THE
SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW**

ADVICE

I. INTRODUCTION

1. I am instructed by Turley on behalf of Bellway Homes Limited ('Bellway') in relation to the present approach taken by South Staffordshire Council ('the Council') as regards its Local Plan Review. Through the course of the development of the emerging South Staffordshire Local Plan ('SSLP') Turley have promoted, on behalf of Bellway, four sites for residential development and inclusion within the SSLP.
2. Those sites are (i) land west of Hyde Lane, Kinver, (ii) land east of Dunsley Drive, Kinver, (iii) land east of Orton Lane, Wombourne and (iv) land west of Strathmore Crescent, Wombourne. Sites (i), (ii) and (iv) lie within the Green Belt. Site (iii) was 'safeguarded' in the extant development plan.
3. The Council published the SSLP in November 2022 with the required consultation period running from 11th November 2022 to 23rd December 2022 (per Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ('the Regulations')).
4. The published SSLP explained that "*Unmet housing need across the GBBCHMA is a key cross boundary issue to be addressed with neighbouring authorities...*" (§3,7, pg 11) and

that *“A key part of the new Local Plan is to establish the role that South Staffordshire Council can play in meeting both its own housing needs and those of the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) which contains local authorities with significant unmet housing needs”* (§5.8, pg 27).

5. The published SSLP identified the housing need for the district to be 241 dwellings per annum over the plan period 2022-2039 (§5.9, pg 27). The published plan then continues by explaining the role that the Council has played as part of the GBBCHMA including the joint preparation of the GBBCHMA Strategic Growth Study in 2018.
6. There then follows discussion of the likely quantum of unmet need within the GBBCHMA and that *“Using this evidence, it was proposed to test an additional contribution of 4,000 dwellings to the unmet housing needs of the GBBCHMA in the Council’s local plan review...”* (§5.12, pg 27).
7. This careful explanation confirms that the Council recognised the requirement within the GBBCHMA to accommodate the unmet housing needs of other authorities and the assessment of South Staffordshire’s ability to accommodate some of that need was considered throughout the preparation of the SSLP: *“It also ensured that the issue of unmet housing needs was considered from the earliest stage possible in the plan’s preparation and to provide Duty to Cooperate partners with the chance to comment on the approach from the earliest stage of the plan-making process”* (§5.12, pg 28).
8. The Duty to Co-operate Topic Paper (2021) explained the positive approach that the Council had taken to date in the preparation and evolution of the SSLP: *“To date the Council has used the GBHMA Strategic Growth Study recommendations as the basis for its contributions to unmet GBHMA housing needs, seeking to ensure the emerging housing target is proportionate to the findings of that study...”* (§5.5, pg 6). The Council were content that this approach was not only endorsed but supported by the other GBBCHMA authorities *“To date there has been broad support for South Staffordshire’s housing targets from many local authorities across the GBHMA”*.
9. An updated DtC Topic Paper was published in advance of the Regulation 19 consultation in November 2022. It states that *“At each stage of the Local Plan Review’s preparation, the Council has sought to be informed by the most up-to-date Duty to Co-operate position*

available at that point in time, having regard to the most recent joint evidence and correspondence available at those points in time.” (§4.6, pg 5).

10. The published SSLP confirmed the Council’s view that *“Given the evidence to date, it is still clear that a significant housing shortfall is likely to remain across the GBBCHMA... and the Council will continue to play a proactive part in cross-boundary agreements to address the housing shortfalls”* (§5.15, pg 28). In terms of the proposed contribution of 4,000 dwellings within South Staffordshire toward that overall unmet housing need §5.16 (pg 28) stated that *“Correspondence to date from key Duty to Cooperate partners... has not raised concerns with the council’s proposed contribution”*.
11. In the same paragraph the published SSLP confirmed *“South Staffordshire therefore proposes retaining the 4,000 dwellings contribution towards the unmet need of the housing market area and will adjust the housing target accordingly to deliver this”*. The overall ‘housing target’ for the published SSLP came to the total of 9,089 dwellings.
12. The published SSLP then went on to set out the spatial strategy and made allocations toward meeting that housing target.
13. Subsequent to the Regulation 19 consultation having been undertaken the Council ‘paused’ further work in relation to the SSLP. In its ‘Local Plan Statement’ (dated 20th July 2023) the Council stated *“In January this year, work on the review of our new Local Plan was paused awaiting clarity from the government on proposed changes to national planning policy which could have implications for us as a green belt authority”*.
14. The Council’s Local Development Scheme (‘the LDS’) (required by s15 Planning and Compulsory Purchase Act 2004 (as amended) (‘the PCPA’)), dated September 2023, reiterates the commitment made in the 2018 Site Allocations Document (Policy SAD1) for the Council to *“...undertake an immediate review of the Local Plan to help address the emerging housing shortfall emanating from the greater Birmingham Housing Market Area”* (§1.1, pg 1).
15. The LDS explains that whilst work on the SSLP had ‘paused’ between January and July 2023 that, given there was no clear indication of when the revised National Planning Policy Framework (‘NPPF’) might be issued, the Council had resumed ‘work’ on the SSLP (§3.4, pg 3) and identified *“...a need to undertake a further Regulation 19 consultation”*.

16. A further DtC Topic Paper was issued recently in April 2024. Much of the previous discussion as to the quantum of unmet need within the GBBCHMA is reiterated. At §5.9 the paper sets out a change of position by the Council in light of the December 2023 version of the NPPF having been issued:

“The Council were previously of the view that the level of growth proposed (incorporating the 4,000 home contribution to HMA unmet need) would be necessary to have a sound plan, however proposed changes to the NPPF cast doubt over that assertion. Following publication of the updated NPPF in December 2023 and confirmation that there was no requirement for Green Belt boundaries to be reviewed or changed, and it was within the authorities’ gift to choose to do so where they could demonstrate exceptional circumstances, led the Council to change its strategic approach”

17. Instead (§5.11) it is stated that “*The Council is now progressing a capacity-led approach focusing growth to sustainable non-Green Belt sites and limited Green Belt development in Tier 1 settlements...*”. That approach, it is said, will deliver c640 dwellings toward unmet need arising in the GBBCHMA rather than the previously proposed 4,000 dwellings.

18. The Spatial Housing Strategy Topic Paper (also issued in April 2024) states that “*The preferred spatial strategy has been arrived at through an iterative process of developing the local plan*” (§1.1, pg 1) and that a “*...preferred spatial strategy has been identified*”. That strategy is ‘Option I’ which is the ‘capacity-led approach’ as stated above.

19. Notwithstanding the statement at §4.6 (present in each iteration of the DtC Topic Paper) that “*At each stage of the Local Plan’s Review’s preparation, the Council has sought to be informed by the most up to date Duty to Co-operate position available at that point in time, having regard to the most recent joint evidence and correspondence available at those points in time*” Appendix A (the DtC Schedule) records:

“South Staffordshire Council wrote to all authorities within the GBBCHMA in October 2023 setting out that South Staffordshire was revising its strategy and asked for their initial views on this revised approach. These letters and responses can be found in Appendix...”

20. No Appendix is identified, nor is any such correspondence included within the DtC Topic Paper nor its Appendices. A series of draft Statements of Common Ground are appended

to the DtC Topic Paper, all following a similar form and all explaining the Council’s change of position as regards contributing toward meeting unmet need. None are in final form nor signed, it is not clear at all whether the other joint authorities are content with the proposed wording and / or the change of approach adopted by the Council.

21. ‘Option I’ (nor ‘Option H’) existed prior to the Council ‘pausing’ work on the SSLP and the anticipated publication of the revised NPPF. Neither option includes the 4,000 contribution toward meeting the unmet need of the GBBCHMA. Instead, both adopt a ‘capacity-led’ approach, as explained in the paper being that *“In other words, the overall level of growth is determined by the capacity of the suitable sites that align with the strategic approaches outline. As opposed to the previous proposed approach (under Option B-G) of meeting a top-down determined housing target (i.e. our own needs plus a 4,000 contribution towards the GBBCHMA)”* (§2.7, pg 3).

22. The Council has now published the revised SSLP and is undertaking the Regulation 19 consultation process. The 2024 publication version of the SSLP explains the spatial strategy in terms of housing (§5.12):

“In December 2023 the updated NPPF was published and confirmed that there is no requirement for Green Belt boundaries to be reviewed or changed when Local Plans are being prepared and that it is within authorities’ gift to choose to review Green Belt boundaries through the Local Plan where they feel that exceptional circumstances for doing so exist and these can be fully evidenced and justified.”

23. At §5.16 it is stated that national policy indicates *“...Green Belt release is solely the choice of the council”*.

24. I am asked to consider whether or not the present approach adopted by the Council in terms of progressing the SSLP is in accordance with national policy. As set out below I consider that the Council’s approach is not in accordance with national policy.

II. DISCUSSION

25. NPPF §35 deals with the examination of local plans confirming that they are to be *“...examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound”*. In order to be found ‘sound’ a local

plan must meet the requirements of being (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy. There has been no change from the previous version of the NPPF in terms of those requirements.

26. Consistency with national policy is further explained as *“enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”*.

27. The policies in the Framework plainly include those in relation to Green Belt, the point being that the change in approach taken by the Council post July 2023 is expressly stated within the 2024 DtC Topic Paper, the 2024 Spatial Housing Strategy Topic Paper and the SSLP itself to be predicated upon changes to Green Belt policy introduced in the December 2023 version of the NPPF.

28. The Council relies upon NPPF §145:

Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process...

29. The previous version of that same policy (numbered §141) provides:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

30. Just as with previous revisions to the NPPF the present version contains transitional provisions to account for specific circumstances. NPPF §230 provides:

The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. For Spatial

Development Strategies, this Framework applies to strategies that have reached consultation under section 335(2) of the Greater London Authority Act 1999 after 19 March 2024. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned.

31. Reading the language of the policy in a natural and ordinary way it is clear that a plan which has reached Regulation 19 stage by no later than 19th March 2024 must be examined under the relevant previous version of the NPPF. Those which reach Regulation 19 stage after 19th March 2024 must be examined under the provisions of the present (December 2023) version of the NPPF.
32. In the present case the SSLP reached Regulation 19 stage in 2022. It is quite correct that the Council is re-consulting on the SSLP through another cycle of the Regulation 19 consultation but that does not detract from the point that the SSLP had *already* reached that point *before* March 19th 2024.
33. Nowhere in the SSLP Evidence Base, nor the SSLP itself, is NPPF §230 identified or acknowledged, nor its implications examined. The only rationale provided in the Council's published documents for the change in its approach is the 'change' in national GB policy (along with the datedness of the evidence in relation to the scale of unmet need in the GBBCHMA).
34. It might be said by the Council that the 2024 publication of the SSLP is a *different* plan to that subject to consultation in 2022 such that it is only *this* version of the plan which has reached Regulation 19 stage and so is past the 'cut off' date. Such a contention would be wrong.
35. Firstly, the final paragraph of NPPF §230 deals with the scenario where there might be a 'new' plan subsequent to a previous Regulation 19 consultation. That scenario is where the plan in question has been withdrawn or otherwise does not proceed to form part of the development plan. The SSLP has not been 'withdrawn' (not least because it has yet to have been submitted for examination) nor does the Council suggest that it was abandoned at any point (the work was 'paused').

36. Nor has the SSLP not proceeded to become part of the development plan. The SSLP *continues* (at least presently) through the process to *become* part of the development plan. Whilst it is a revised version of the SSLP now presently advocated by the Council it is still the SSLP. Simply because some revision or modification has occurred doesn't change it into a different plan.

37. That is clear because otherwise *any* modification would result in the 'modified' plan in fact being a 'new plan'. Consider the outcome of an examination in public. In nearly all instances modifications are proposed following examination (some 'major' and some 'minor', some volunteered by the LPA, some 'suggested' by the Examining Inspector).

38. Incorporation of such modifications does not render the subsequent version of the plan a *different* plan to that which was the subject of examination. It does not render it a *new* plan. Nor does it mean that the examined plan has been 'withdrawn' or 'not proceed[ed] to become part of the development plan'. That plan still proceeds to become part of the development plan albeit with revisions.

39. Regulation 5 of the Regulations provides that local development documents ('LDDs') are:

(a) any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—

(i) the development and use of land which the local planning authority wish to encourage during any specified period;

(ii) the allocation of sites for a particular type of development or use;

(iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and

(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission

40. Quite obviously the SSLP is a DPD as it is such a document. It is also, for the purposes of the Regulations a 'Local Plan' as it is a document falling within the descriptions provided at Reg 5(a)(i), (ii) and (iv) (see Regulation 6 'Local Plans').

41. That, even revised, it is the same 'Local Plan' is clear from Regulation 18 which requires that:

(1) A local planning authority must—

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

42. If a revised version of a Local Plan were to be treated as a new, different, Local Plan then the plan-making authority would be required to go back to the very start of the plan-making process and engage in early (Regulation 18) consultation to inform the development of that *new* Local Plan ('must').
43. The consequence of such an approach would be impractical requiring every revised version of a Local Plan to be treated as a new Local Plan and so going back to the very start of the plan making process. That cannot be right as a sensible conclusion as to the consideration of what a 'subsequent plan' might be. The (now revised) SSLP is not a 'subsequent plan' to the (various previous versions) of the SSLP, it is still the same Local Plan which is following a linear process through consultation, then examination and then adoption.
44. So, in the present case, if the Council *do* consider the 2024 publication version of the SSLP to be a *new* Local Plan then rather than simply writing to other LPA's through the DtC process to state that it had revised its approach the Council should, following Regulation 18, have notified all relevant bodies as to the subject of the *new* Local Plan the Council was proposing to prepare and inviting representations as to what it ought to contain.
45. It is clear that the SSLP falls to be examined "*under the relevant previous version of the Framework...*" and so it is the policies of that version of the NPPF which the SSLP falls to be considered against should it proceed to examination.
46. Given that the Council's justification for its (significant) change in approach is its understanding of the change to GB policy in the December 2023 version of the NPPF the approach that it has taken (reliance upon a version of the NPPF against which the SSLP is not to be examined) is not in accordance with national policy (i.e. NPPF §230).
47. Furthermore, on the Council's own stated (in various published documents) understanding of the previous iteration of national GB policy, the strategy now advocated (the 'capacity led' approach) would not be consistent with national policy contained within the relevant iteration of the NPPF (i.e. the version of the NPPF against which the SSLP *is* required to be examined).

48. On either basis the SSLP cannot be found ‘sound’ because it is not consistent with national policy.
49. The Council has either failed to recognise the relevance of NPPF §230 or misunderstood it. It is not clear which given the absence of any reasoning provided in the various documents published.
50. On an entirely separate point the (radically) changed approach of the Council as regards its co-operation and participation in the GBBCHMA is of obvious concern. Much of the evidence base ‘plays up’ the ‘lead’ that the Council has taken in the question of establishing the quantum of unmet housing need and the potential solutions for seeking to meet it.
51. However, once the Council decided that it didn’t need to release Green Belt (post ‘pause’), the contribution which the Council intended to make to solving that regional issue all but evaporated (only a very modest contribution remains proposed). In terms of co-operation with the joint authorities all that the Council has done, since embarking upon such a radically altered approach, is to inform the other authorities that it is doing so. The latest DtC Topic Paper does not even include the correspondence with those authorities despite stating that it does.
52. The NPPF requires LPAs to maintain ‘effective co-operation’, NPPF §26 provides that *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy”*. Proceeding for years through the plan-making process on the premise that a significant contribution would be made within the SSLP toward meeting unmet need to then ‘about face’ and write to all of the authorities to inform that that was no longer the approach is not effective and on-going joint working but the exact opposite. Such an approach does not, and cannot, lead to the production of a positively prepared and justified strategy.
53. This is a further reason why the SSLP, in its now proposed form, is not ‘sound’ as it fails the necessary tests of being ‘justified’ and ‘positively prepared’.

23rd May 2024

Christian Hawley

No5 Chambers

**IN THE MATTER OF THE
SOUTH STAFFORDSHIRE COUNCIL LOCAL PLAN REVIEW**

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Appendix 7: Turley Falling Even Shorter Report

Falling Even Shorter

an updated review of unmet housing
needs in the Greater Birmingham and
Black Country Housing Market Area

December 2023

Turley

Contents

1. Introduction and purpose	02
2. Update to GBBCHMA unmet need context	04
3. Scale of need up to 2031 and beyond	06
4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)	08
5. Quantifying the unmet need to 2031 (and beyond)	11
6. Conclusions and recommendations	14

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1. Introduction and purpose

Turley is instructed by a consortium of housebuilders and land promoters to provide an updated assessment of the position relating to housing need and land supply across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA' or 'HMA') in order to quantify the true scale of unmet need to 2031, and beyond.

It is now more than two years since the Turley 'Falling Short' report was published. That report critiqued the 'third position statement', published by the GBBCHMA authorities in September 2020, which claimed only a 2,597 housing shortfall remained across the HMA up to 2031. The Turley 'Falling Short' report found that there was a minimum shortfall up to 2031 of almost 9,000 homes.

An addendum to the third position statement was published in December 2020 followed 'Falling Short' indicating that the scale of unmet need as of 31 March 2020 was 6,302 homes. Since then a further addendum to the third position statement was published in April 2023, that now claims a shortfall of 2,053 homes across the GBBCHMA as of 31 March 2021.

Given the wider national planning policy context, since 'Falling Short' no GBBCHMA authority has adopted a new local plan and progress has been faltering:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years.
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

That is despite only North Warwickshire having a plan less than five years old, with the four Black Country authorities not having a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities having a plan adopted over ten years ago as of January 2024.

The lack of plan making progress is at risk of significantly impacting a number of the 14 HMA authorities' ability to meet their housing needs, as required by NPPF paragraph 35. This update to 'Falling Short' therefore seeks to quantify the scale of the unmet need across the GBBCHMA as of 31 March 2023. This includes critiquing the GBBCHMA's most recent position statement, published in April 2023, with a base date of 1 April 2021.

Purpose of this report

This report provides the consortium's independent assessment of the overall housing need and supply position so as to identify the true updated scale of unmet need, focusing on the period to 2031.

The focus upon 2011 to 2031 reflects the timeframe covered by the position statements, as well as various other evidence base studies concerning need and supply prepared since 2013. As with 'Falling Short', this report does consider the position beyond 2031 in high level terms up to 2036 and 2040, mindful that NPPF paragraph 22 requires local plan strategic policies to look ahead over a minimum 15 year period from adoption and set a vision that looks further ahead (30 years), and that all emerging plans are considering plan periods beyond 2031.

The consortium

The consortium comprises the following housebuilders and land promoters, all of whom play a key role in the strategic planning of sustainable housing delivery across the HMA and wider West Midlands region:

- **Bellway Homes**
- **Catesby Estates Plc**
- **Gladman Developments Ltd**
- **Hallam Land Management**
- **Harworth Group Plc**
- **Taylor Wimpey**
- **Vistry Group Plc**
- **Wain Estates**
- **William Davis Homes**

Report structure

The report is structured as follows:

- **Section 2** summarises the most up to date GBBCHMA unmet need context.
- **Section 3** assesses the scale of housing need to 2031, and beyond.
- **Section 4** provides an overview of the most up-to-date position in respect to the GBBCHMA's total housing supply for 2011 to 2031.
- **Section 5** draws conclusions on the scale of unmet need to 2031 and beyond, taking into account the HMA's total need and evidenced supply.
- **Section 6** sets out the overall conclusions in respect to the scale of the unmet need.

2. Update to GBBCHMA unmet need context

This section provides an update on the GBBCHMA unmet need context, including the current starting point for calculating the unmet need.

GBBCHMA Position Statement Addendum (April 2023)

The Position Statement Addendum (the 'Addendum'), dated April 2023 and published in October 2023, provides the supply and shortfall position across the GBBCHMA between 2011 and 2031 as of 31 March 2021. The Addendum continues to use the Greater Birmingham HMA Strategic Growth Study ('SGS') (2018) prepared by GL Hearn and Wood as the starting point for calculating the HMA's housing needs. This is reflected on further at section 3 of this report in determining the scale of need for housing across the GBBCHMA.

The Addendum also continues to consider the level of unmet need **up to 2031**, this reflects the timeframes for the SGS, which essentially uses the Birmingham Development Plan's plan period as its starting point.

The Addendum claims the HMA has a housing supply of 205,926 homes for 2011-2031 as of 31 March 2021. Against the SGS' 'baseline' housing need for the same plan period of 205,099 homes, and factoring in a contribution to the Coventry and Warwickshire Housing Market Area ('CWHMA') of 2,880 homes, the Addendum indicates that the remaining shortfall of housing across the HMA has reduced to 2,053 homes.

The Addendum's base date is now more than two years' ago. Firstly, there has been two years' worth of additional monitoring data, and in some cases, updated supply positions, which essentially renders the position in the Addendum out of date (which is explored further at section 4 of this report in terms of how the supply position across the HMA is assessed).

Secondly, in that time there has been limited local plan progress across the entire HMA.

Local plan progress

With circa 43% of the entire GBBCHMA comprising Green Belt, local plans are an absolutely critical tool in ensuring the HMA meets its housing needs. It is clear that brownfield land will not be enough to meet the HMA's needs, as demonstrated by the shortfall that still remains unaccounted for from the Birmingham Development Plan adopted nearly seven years' ago, and the emerging Dudley and Sandwell plans and their associated evidence bases (which are discussed below).

Almost three years have passed since 31 March 2021. In that time there has been limited progress in advancing local plans across the HMA. Even since April 2023, the context has significantly changed and plan making across the HMA has faltered, as summarised below:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years. Following this each local authority is now preparing its own individual plan. So far Sandwell has published a draft plan with a 18,606 housing shortfall (62% of the borough's total need), and Dudley's draft plan proposes a shortfall of 1,078 homes (9% of the borough's total need).
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to their issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021. The examination was paused in June 2023, pending any updates to the NPPF.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

This is despite national planning policy requiring reviews of plans every five years. Only North Warwickshire have a plan less than five years old, the four Black Country authorities do not have a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities have a plan adopted over ten years ago as of January 2024

Furthermore, it does not appear that this position will change in the short term. Just four authorities have local development schemes committed to submitting a plan before the end of 2024, with a further three committed to submitting before the end of 2025.

With the HMA significantly constrained by Green Belt, local plans are critical to ensuring its housing needs are met in full as brownfield land will not have sufficient capacity alone. Without local plans being advanced reviewing Green Belt boundaries, it is unlikely the GBBCHMA's housing needs can be met in full. This is the critical matter that this report will explore.



3. Scale of need up to 2031 and beyond

Considering the need to 2031

The Addendum continues to reference the ‘baseline’ scenario from the SGS, which suggests a minimum need for 205,099 homes between 2011 and 2031 or 10,255 homes per annum on average.

While this technically remains the last study to have consistently assessed need in all 14 authorities, it is clearly becoming increasingly dated having been finalised almost six years ago in February 2018, and no doubt produced over an extended period prior to that. The extent to which the SGS continues to represent ‘up-to-date evidence’, of the kind that the NPPF at paragraph 31 expects to underpin all planning policies, is therefore open to question. It patently does not allow for the population of the HMA to be some 4% larger than it was then, nor for the area to offer around 8% more jobs, and for the affordability of housing relative to earnings to have worsened in every single authority by an average of 19%¹.

The SGS has undoubtedly had value in providing a consistent assessment of need across the HMA, but circumstances have changed with the introduction of a standard method that has now been required to form the basis of plan-making for almost five years. It was explicitly designed to standardise assessments of housing need, bringing consistency between local authorities and consequently filling at least part of the role formerly played by the SGS. Many of the authorities in the HMA appear to have taken the same view, having commissioned various studies that feature the standard method which generally consider it to provide a reliable indication of their local housing need.

As such, it is highly relevant to note that the standard method suggested a greater need for some **11,868 dwellings per annum** as of April 2021, the base date of the Addendum.

However, this is known to have underestimated the full need as it included a figure for Birmingham that was capped above an existing requirement, but the lifting of the cap in January 2022 – when the Birmingham Development Plan became more than five years old – elevated the need to **at least 13,868 dwellings per annum** and it subsequently rose even further, to at least **14,341 dwellings per annum** in April 2023, when new affordability data was taken into account.

This should not necessarily replace in full the scenario developed in the SGS, which looked back to 2011, but that should equally not take precedence over a standard method that has now been in place for almost five years. The NPPF makes clear at paragraph 61 that it should be used to assess the minimum need for housing in all but exceptional circumstances, which have clearly not been demonstrated by the local authorities in this area.

A sensible and rational approach in these circumstances, which provides a level of consistency with the SGS while adhering to current national policy, would be to align with the SGS ‘baseline’ scenario in the ten years to the base date of the Addendum (2011-21) before aligning with the outcome of the standard method, as of the base date of April 2021, for the second ten-year period² (2021-31). This results in a minimum need for **221,230 homes** over the entire twenty years, some 8% more than suggested by the PSA³.

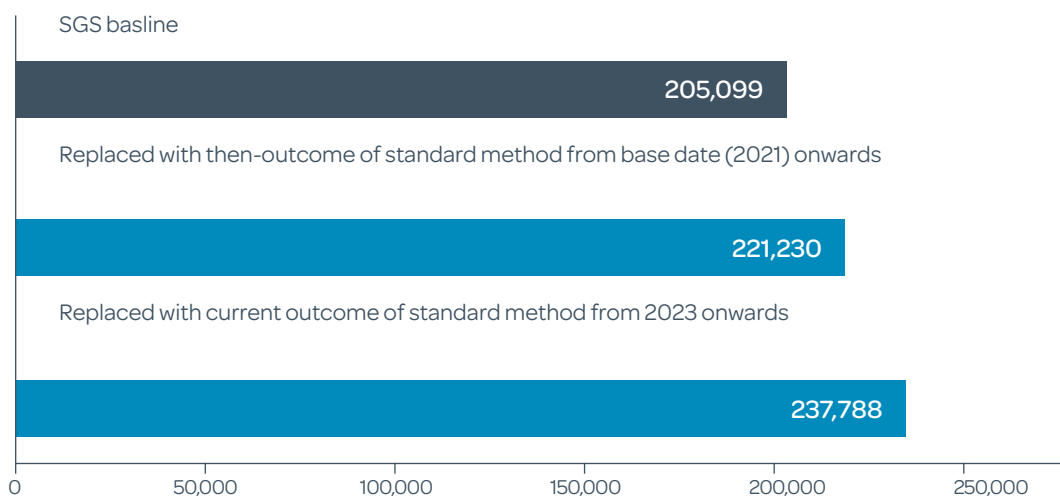
That said, with the outcome of the standard method known to have been an underestimate in April 2021 – rising thereafter, due to worsening affordability and the lifting of the cap in Birmingham – it is arguably also appropriate to consider a scenario based on the current outcome of the standard method (14,341dpa). This would suggest a substantially greater need – for some 237,788 homes in total – even if it was to be applied only from 2023 onwards, reverting to the SGS for the prior two years to avoid using the outcome of the standard method so retrospectively.

¹ Comparing data for 2022 to equivalent figures for 2015, where this appears to have been the latest population data available when the SGS was prepared (according to its paragraph 3.26)

² 11,868 dwellings per annum

³ Excluding the 2,880-home contribution to the Coventry and Warwickshire HMA, which – though included in the Addendum – is considered separately in this report’s section 5

Figure 3.1: Turley Estimates of Overall Housing Need (2011-31)



Source: Turley analysis

Looking beyond 2031

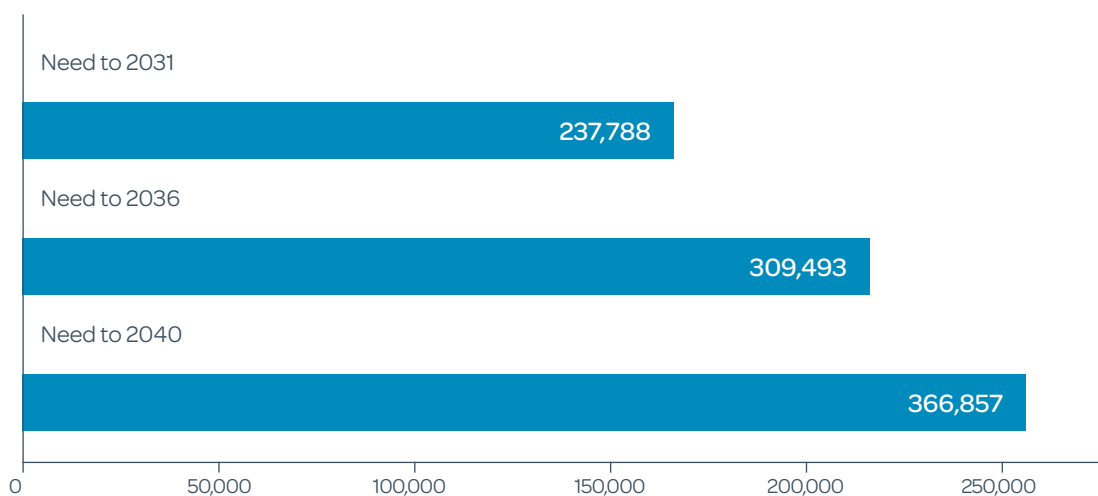
While the above – like the Addendum – provides an estimate of need to 2031, it can be easily extended to cover a longer period to 2036 or 2040.

This is important because NPPF paragraph 22 requires emerging local plans in the HMA to look at least 15 years into the future, such that they are seeking to deliver strategic growth into the late 2030s and even beyond in some cases.

While the standard method technically draws upon a ten-year baseline, the PPG makes clear that its outcome can be extrapolated as necessary to cover any period⁴.

It is not considered appropriate to extrapolate the capped figure in this way but using the current outcome of the standard method from 2023 onwards and using the SGS ‘baseline’ to that point, suggests that some 309,493 homes are needed throughout the HMA between 2011 and 2036. Circa 366,857 homes are implied to be needed when using the same approach for the period from 2011 to 2040.

Figure 3.2: Estimated Need to 2036 and 2040



⁴PPG Reference ID 2a-012-20190220

4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)

'Falling Short' sets out general observations in respect to the supply identified in the third position statement (September 2020), and the majority of those remain relevant in respect to the Addendum, including:

- It only addresses 2011 to 2031 despite local plan reviews now looking well beyond that.
- The base date then was 31 March 2019 and more than two years had passed at the point of 'Falling Short' being published, with the Addendum having a base date of 31 March 2021 the supply data remains two years out of date.
- The supply is broken down into different categories for all 14 authorities, however the raw data underpinning this is not provided as part of the Addendum, or any previous position statement.
- The supply data has not been independently examined.
- The supply is 'unadjusted' as it does not apply the standardised non-implementation discount rates from the SGS which provided a consistent approach across the HMA. Instead, only local discount rates are applied so several authorities do not apply any discounts for non-delivery (Birmingham, Bromsgrove, Redditch and Stratford).

The 14 authorities' agreed position in respect to the extent of the total supply across the entire GBBCHMA between 2011 and 2031 is **205,926 homes**, as presented at paragraph 3 of the Addendum. The Addendum has a base date of 31 March 2021 and includes all completions up to that point. This represents a total shortfall of 2,053 homes, a significant reduction from 6,302 homes as of 31 March 2020 (as presented in the December 2020 Addendum to the third position statement). Paragraph 3 of the Addendum states that Birmingham is responsible for the majority of the additional capacity identified.

More than two years have passed since then, the Addendum therefore does not reflect any housing completions or additional supply which has come forward in the intervening period. This report therefore seeks to assess the GBBCHMA's supply based on the most up-to-date evidence available.

Method of analysis

A critical factor in any analysis of the shortfall position across the GBBCHMA is an accurate position of the HMA's overall supply.

To understand the 14 authorities' current supply positions this report has reviewed in detail all the most up-to-date evidence, which is summarised in Table 4.1 below.

Table 4.1: Source of evidence for completion and supply data

Authority	Most up-to-date evidence	Base date
Birmingham	2020 SHLAA (March 2022) and Five Year Housing Land Supply Statement 2023-2028	31 March 2023
Bromsgrove	Housing Land Supply in Bromsgrove 2011-2022 (April 2023)	31 March 2023
Cannock Chase	Authority Monitoring Report 2021-22 (undated)	31 March 2021
Dudley	SHLAA 2021/22 Update (undated)	31 March 2022
Lichfield	Five Year Housing Land Supply 2023 (July 2023)	31 March 2023
North Warwickshire	Annual Monitoring Report Up to 31 March 2022 (November 2023)	31 March 2022
Redditch	Housing Land Supply in Redditch 2011-2022 (April 2023)	31 March 2023
Sandwell	SHLAA and 5 Year Housing Land Supply Update as of April 2022 (October 2023)	31 March 2022
Solihull	Examination of Solihull Local Plan – Housing Trajectory and Five Year Housing Land Supply (December 2021) / Draft SHELAA Update 2020 (October 2020)	31 March 2021
South Staffordshire	Housing Monitoring and Five Year Housing Land Supply 2022-2023 (December 2023)	31 March 2023
Stratford	Authority Monitoring Report 2021-22 (December 2022), SHLAA and Five Year Housing Land Supply report Update March 2023	31 March 2023
Tamworth	Draft Housing Delivery Paper (December 2023)	31 March 2023
Walsall	Strategic Housing Land Assessment and Statement of Housing Land Supply 2022 (undated)	31 March 2022
Wolverhampton	SHLAA 2022 (September 2023)	31 March 2022



The majority of the GBBCHMA authorities' most up-to-date evidence available is prepared on the basis of a 31 March 2022 base date, though there are a few exceptions where it is based on an older base date of 31 March 2021 (i.e. Birmingham, Solihull, and Stratford).

This report's independent assessment of the supply position across the GBBCHMA is on the basis of a **31 March 2023 base date**. To complement the 14 authorities' most up-to-date evidence this report uses the DLUHC's net additional dwellings by LPA table (table 122)⁵ so that it reflects the most up-to-date data for completions for 2022-23 (i.e. up to 31 March 2023), and for those authorities who only provide completion data for 2020-21 (i.e. up to 31 March 2021).

As part of this exercise, all 14 authorities were contacted to confirm the data that was used to inform the addendum and the most-up-date source of evidence in respect to housing supply.

Supply position

Based on the above methodology, the most up-to-date evidence demonstrates that the total supply across the GBBCHMA between 2011 and 2031 is **199,992 homes**.

As per paragraph 4 of the Addendum, the Coventry and Warwickshire Housing Market Area (CWHMA) Memorandum of Understanding assumes that a total of 2,880 homes from North Warwickshire and Stratford are to contribute to that HMA's unmet needs. Reflecting the Addendum's approach, the report therefore adds this contribution to the minimum housing requirement, when quantifying the housing need at section 5.

This is even before interrogating the components of supply which make up each authorities' supply. For instance, Birmingham has assumed that the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site. It also does not include a standardised non-implementation discount rate, therefore the individual supply position for at least four of the authorities does not factor in any non-implementation discount.

Reflecting the above, the supply position of **199,992 homes** can therefore be assumed to be a 'best case' scenario.



⁵DLUHC Live tables on housing supply: net additional dwellings by LPA (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>)

5. Quantifying the unmet need to 2031 (and beyond)

Having presented the most up-to-date scenarios in terms of the HMA's needs at section 3 and supply at section 4, this section quantifies the true scale of the HMA's unmet need between 2011 and 2031.

Addendum shortfall position

Set out in Table 5.1 below is the shortfall position based on the Addendum's claimed supply of **205,926 homes**.

Table 5.1: Scale of GBBCHMA shortfall based on Addendum claimed supply

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Addendum claimed supply	205,926	205,926	205,926
Scale of shortfall	2,053	18,184	34,742

Using a base date of 31 March 2021 and not seeking to interrogate the data presented in the Addendum, the claimed shortfall is 2,053 homes based on the SGS baseline.

The Addendum however fails to fully acknowledge that circumstances have changed since the SGS was published with the introduction of the standard method. The starting point for calculating unmet need should therefore be based on using the standard method to calculate housing need from the base date of 31 March 2021.

When applying the then-outcome of the standard method from the base date, the shortfall is 18,184 homes. If the current standard method were to be applied from the current base date of 31 March 2023, the approach advocated by this report for the reasons set out at Section 3, the shortfall is 34,742 homes.

As national planning policy and guidance is clear that standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position alone, the shortfall position across the GBBCHMA stands at 34,742 homes.

Turley shortfall position

The Addendum was based on data with a 31 March 2021 base date. As discussed earlier there is now more up-to-date evidence for the majority of authorities in terms of both completions and proposed supply, as well as national completion data.

Section 4 of this report has therefore calculated a total supply position using a base date of 31 March 2023. Table 5.2 below sets out the Turley supply position against the different need positions.

Table 5.2: Scale of GBBCHMA shortfall based on Turley supply position

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards (Turley advocated approach)
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Turley supply	199,992	199,992	199,992
Scale of shortfall	7,987	24,118	40,676

Using the most up to date base date, following the Addendum's approach of using the SGS baseline housing need figure, the shortfall is **7,897 homes** across the HMA up to 2031.

Reflecting national planning policy and guidance, the housing need scenarios which incorporate the standard method should be used as a starting point for calculating the HMA's unmet needs, in particular the scenario which uses the current outcome of the standard method from 2023 onwards. When these are applied the shortfall ranges between **24,118** and **40,676 homes**.

The above assumes the supply data in each authorities' evidence base documents is accurate. Given the minimum shortfall position on the council's and government evidence alone is significant, it is not necessary to further interrogate in detail the components of supply. However, a review of the evidence base documents demonstrates that some sites included in supplies do not meet the definition of deliverable for reasons such as still being in another use.

Ambitious delivery rates which are unlikely to be met have also been assumed for some sites. Indeed it has been assumed the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site.

Conclusions on unmet need to 2031

The above analysis reveals that there remains a significant unmet need across the HMA to 2031 with the window to deliver this continuing to narrow.

The 14 authorities should be planning positively to deliver the most recent standard method need and ensuring the unmet need of **40,676 homes** up to 2031 as reflected in the most up-to-date evidence is accommodated in full through emerging local plans.

Looking ahead – an indication of the shortfall to 2036 and 2040

As with 'Falling Short', it is difficult to accurately quantify the unmet needs beyond 2031 because there remains an incomplete picture in terms of the HMA's housing supply beyond this date. This report provides an indication of the potential scale of unmet need between 2011 and 2036, and 2011 and 2040, based on each authorities' most up-to-date evidence.

From reviewing the data it is clear there is no supply information for the majority of authorities post 2031. This report has therefore taken the same approach as 'Falling Short' and therefore sought to extrapolate the Addendum and Turley supply position by annualising the supply figure (10,296 homes and 10,000 homes, respectively rounded up) and applying the annual figure each year beyond 2031.

This has been tested against the 2036 and 2040 need positions which use the standard method from 2023 onwards, the approach this report advocates as presented at section 3.

This approach is relatively simplistic and crude and it is arguable as to whether the urban areas can continue to deliver at rates similar to 2011-2031 and how any changes to national planning policy may impact this. It however provides a useful indicator as to the potential scale of the shortfall post-2031, as summarised below.

Table 5.3: Scale of GBBCHMA shortfall up to 2036 and 2040

	Need to 2036	Need to 2040
Need	309,493	366,857
Need with CWHMA contribution	312,373	369,737
Addendum claimed supply (extrapolated)	257,400	298,584
Shortfall against claimed Addendum supply	54,973	71,153
Turley supply (extrapolated)	250,000	290,000
Shortfall against Turley supply	62,373	79,737

As referred to above, this exercise provides the likely direction of travel in terms of unmet need across the HMA, which will likely be established via emerging local plans with unmet need, such as Birmingham.

6. Conclusions and recommendations

The 14 Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') authorities published in October 2023 (dated April 2023) their updated Position Statement Addendum ('the Addendum'). The headline conclusion was that, as of 31 March 2021, the 2011 to 2031 shortfall across the GBBCHMA is estimated to be 2,053 homes.

In response this report has been commissioned by a consortium of housebuilders and promoters to provide an updated position to the Turley 'Falling Short' report (August 2021) to take stock of the position in order to quantify the true scale of unmet to 2031, and beyond.

As with 'Falling Short', this report has focused on 2011 to 2031 as the timeframe covered by the Addendum. The report has however looked beyond 2031 in high-level terms given emerging plans across the GBBCHMA will go well beyond 2031.

The Addendum, published in October 2023, claims the GBBCHMA's shortfall arising between 2011 to 2031 has now reduced to 2,053 homes. This is however predicated on a base date of 31 March 2021, nearly three years ago. In that time, there is now additional monitoring data, and updated supply positions from the majority of GBBCHMA authorities, which has not been reflected in the Addendum's findings.

Furthermore, the Addendum continues to reference a need for **205,099 homes** over the period from 2011 to 2031, based on the Greater Birmingham HMA Strategic Growth Study (2018) that is increasingly dated having been produced almost eight years ago.

The standard method has since been introduced, offering the consistency that the SGS itself sought to provide. While this cannot be backdated to 2011, it can be reasonably used in place of the SGS scenario as an indicator of future needs.

Applying it from the base date of the Addendum (31 March 2021) suggests that some **221,230 homes** are needed between 2011 and 2031 but this rises to **237,788** when the current outcome is used from 31 March 2023 onwards, allowing for worsening affordability and the removal of the cap for Birmingham. This approach, which best reflects national policy, indicates that some 309,492 homes are needed over the longer period from 2011 to 2036, with 366,857 needed to 2040.

As national planning policy and guidance is clear that the standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position, the shortfall position across the GBBCHMA stands at **34,742 homes**. Based on the Turley supply this shortfall increases to **40,676 homes**. This is the scale of unmet need that best represents the most up-to-date evidence. This shortfall increases to **62,373 homes** up to 2036, and **79,737 homes** up to 2040, when extrapolating the available supply data.

As required by the duty to cooperate it is critical that this quantified unmet need up to 2031 should be distributed between emerging local plans and delivered. This will require difficult decisions, including reviewing Green Belt boundaries.

As suggested in 'Falling Short', it remains the case that a strategic plan or framework is required to cover long term growth across the GBBCHMA, potentially to 2040 and beyond.



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**Appendix 8: EDP Heritage and Landscape
Technical Note**

Hyde Lane and Dunsley Drive, Kinver

Heritage and Landscape Technical Note regarding the Proposed Allocation of Site 274 Land South of White Hill in the South Staffordshire Local Plan

edp4711_r008a

QA: WGa/CJo_LLI/CRo_210524

1 INTRODUCTION

- 1.1 This Technical Note has been prepared to support representations to the South Staffordshire Local Plan Review (LPR) Regulation 19 consultation for Bellway Homes Limited, in terms of their land interests at Hyde Lane and Dunsley Drive, Kinver.
- 1.2 It sets out Representations on heritage and landscape matters in respect of the proposed allocation of 'Site 274 Land South of White Hill' for residential development in South Staffordshire Council's (SSC) emerging Local Plan. It is focused on the proposed extension to the south (red line on **Plan EDP 1**) and not the safeguarded land (blue line on **Plan EDP 1**) that now has planning permission and is currently under construction.

2 HERITAGE MATTERS

- 2.1 During the examination of SSC's Site Allocations Document (SAD) in 2017 (adopted in 2018), Historic England objected to 'Land South of White Hill' being removed from the Green Belt and part allocated for development and part safeguarded.
- 2.2 In their written response to the South Staffordshire Council Local Plan – SAD Publication Consultation (comprising a letter dated 27 February 2017), Historic England provided the following comments and questions in terms of SSC's proposed allocation of Site 274 Land South of White Hill:

"The Site Assessment Paper also noted that the site may be in the setting of Kinver Edge and the Rock Houses and that a precautionary approach was needed. It is our view that the development will affect the significance of this heritage asset, particularly the portion outlined as safeguarded land which borders the edge of the woodland at Kinver Edge. How will the site allocation impact upon the significance of the heritage asset? Are there mitigation measures that can be included within the Plan to protect and conserve these assets? Is this site suitable for allocation given the potential impact to this heritage asset?"

- 2.3 These comments and questions are then picked up and (at least in part) answered in paragraph 3.12 of the representations to the South Staffordshire LPR Preferred Options,

prepared and submitted on behalf of Trebor Developments Ltd (the site's promotor), by Avison Young in December 2021. This provides the following comments:

"The Council's Historic Environment Site Assessment (2019) assesses the site as 'amber' noting that whilst there is potential for indirect effects on the historic environment no significant effects that cannot be mitigated are anticipated. A Heritage Impact Assessment of the site has been undertaken by Richard K Morris & Associates. This confirms that heritage impacts of residential development on the site will be very limited and confined to a minor change in the wider views from the north-eastern tip of Kinver Camp scheduled monument but that the setting will not be significantly altered and no other designated or non-designated heritage assets would be affected, such that any harm would be very limited and significantly 'less than substantial'. Nonetheless, in the light of the existing requirements in Policy SAD2, the illustrative masterplan shows how a view corridor from the site access on White Hill, through the scheme, towards Kinver Edge and Holy Austin Road, could be maintained through the careful location and design of public open space and incorporation of single storey development."

- 2.4 This identifies the completion of a Heritage Impact Assessment (HIA), commissioned by the promotor (having been given an 'amber' rating in the Council's earlier Historic Environment Site Assessment (2019)), which itself concludes that:
- a. The site's development would indeed affect the wider setting of Kinver Camp Scheduled Monument (NHLE ref. 1015432) located 400m to the south;
 - b. This would be derived from changes to views outwards from the north-eastern tip of the Iron Age hillfort;
 - c. The impact of these changes would constitute a 'very limited' loss of the asset's significance and therefore 'harm' in terms of the National Planning Policy Framework (NPPF); and
 - d. This harm would be 'less than substantial' in terms of the three categories of harm which are described in Section 16 of the NPPF.
- 2.5 As far as point (b) above is concerned, and with regard to Historic England's second question (are there mitigation measures that can be included within the LPR to protect and conserve these assets), the nature and source of the impact; i.e. changes to outward views from the scheduled monument looking down into the site from a higher elevation, make it unlikely that it could be satisfactorily or adequately mitigated with the usual design measures such as planting and landscaping, and so the question is instead likely to be one of whether this impact can be justified in terms of planning policy.
- 2.6 Paragraph 208 of the Framework (NPPF; December 2023) deals with development proposals which would result in 'less than substantial harm' being caused to 'designated' heritage assets (such as Kinver Camp Scheduled Monument) and advises that the harm should be weighed against the public benefits that would flow from their approval and subsequent implementation.

- 2.7 So, in that sense it is acknowledged that the ‘less than substantial harm’ that the site’s development would cause to Kinver Camp is not an in-principle barrier which precludes the allocation of the site through the emerging plan process, but of course there are other relevant paragraphs in Section 16 of the NPPF that must also be accounted for in the decision-making process, when there would be harm caused to designated heritage assets.
- 2.8 First of all, the acknowledged impact of the site’s development on Kinver Camp Scheduled Monument (a ‘designated’ heritage asset) brings into play Footnote 7 on page 6, which bears upon ‘plan-making’ and ‘decision-taking’ in respect of the presumption in favour of sustainable development in paragraph 11 of the Framework and introduces caveats and restrictions in that context.
- 2.9 Then, in Section 16: Conserving and Enhancing the Historic Environment, paragraph 205 of the Framework advises that:
- “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 2.10 In terms of the phrase *“the more important the asset, the greater the weight should be”*, part b of paragraph 206 of the Framework provides an important clarification when it identifies *“assets of the highest significance”* as including *“scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites.”* So, when Kinver Camp is placed into this context, it is reasonable to conclude that the ‘greatest’ weight should be afforded to its conservation in terms of the decision-making set out in the NPPF.
- 2.11 The same paragraph (paragraph 206) then further adds that *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”*
- 2.12 So, in other words, even if the impact of development on the significance of Kinver Camp Scheduled Monument would be *“very limited”*, it still constitutes harm in terms of the Framework and still requires *“clear and convincing justification”* for the loss of significance which it would cause to a nationally important archaeological site, representing an asset of the highest significance in terms of the NPPF.
- 2.13 Therefore, when set (properly) into that wider context, the question is not whether the public benefits that the site’s development would deliver outweigh the less than substantial harm it would cause to Kinver Camp Scheduled Monument, constituting an asset of the highest significance, but instead whether there is *“clear and convincing justification”* for any harm at all, irrespective of how limited it might be.
- 2.14 In terms of the historic environment and heritage matters, it is hard to conceive that there can be *“clear and convincing justification”* for causing less than substantial harm to Kinver Camp if there are suitable alternatives available elsewhere around the town which could

deliver the same public benefits (such as much needed housing etc.) without causing the same level of harm to designated heritage assets.

- 2.15 Therefore, for the local authority to fulfil its duty to afford the “*greatest weight*” to the conservation of Kinver Camp Scheduled Monument as a designated heritage asset of the highest significance in terms of the NPPF, it should first look to alternative sites at Kinver, which could come forward and deliver the same public benefits, before proceeding with the proposed allocation of a site which Historic England and the promoters themselves identify as generating ‘harm’ to a nationally important archaeological site.

3 LANDSCAPE AND VISUAL MATTERS

- 3.1 Unlike the site allocation land currently under construction, the land suggested as part of the allocation extension does not have nearby residential properties that form a prominent feature in experiences from within the site. Views from White Hill encompass undulating farmland punctuated by mature tree canopies. The site is a notable green interface between Kinver Edge and the village as illustrated at **Image EDP 3.1**.

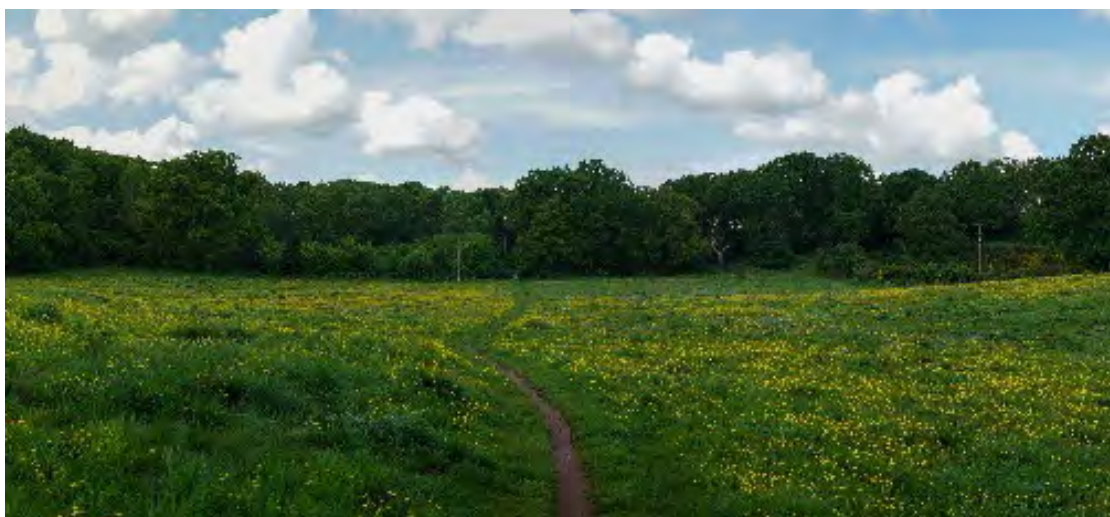


Image EDP 3.1: View from Staffordshire Way public right of way (PRoW) facing west towards Kinver Edge.

- 3.2 The landscape of the site encompasses pastoral farmland with a relatively intact and continuous field enclosure incorporating well maintained hedgerows. There are regular over mature hedgerow trees with well-formed canopies, which are valued landscape elements. Overall, the landscape can be considered to be in good condition.
- 3.3 Although the site is spatially proximate to the settlement edge, its intrinsic features incorporating a distinctive localised rolling landform, mature trees and well-trimmed field hedgerows together present a rural scene, which when combined with the wooded backdrop of Kinver Edge escarpment, portray a high scenic quality.
- 3.4 This can be appreciated by visitors to Kinver Edge plateau and the Holy Austin Rock House, as well as users of the Staffordshire Way PRoW, which traverses the centre of the site on

an east-west alignment, hence, the site is considered to have good recreational access and exhibit a good degree of relative tranquillity.

- 3.5 It is considered that the site is of higher value than the permitted site (currently under construction) (20/00621/OUT) to the north and, due to the presence of valued landscape features and fabric, is more susceptible to changes resulting from residential development, as illustrated by **Image EDP 3.2**.



Image EDP 3.2: View from Staffordshire Way PRoW facing north, the allocated site and settlement edge at White Hill to the north is not visible from this location. Short distance filtered views of the well vegetated settlement edge (rear gardens) of Windows Crescent are visible when facing eastwards.

- 3.6 The South Staffordshire Landscape Sensitivity Study Update (2017) identifies the site as being located in Parcel Kinver KV11, which extends beyond the safeguarded land which has planning permission and is now in the process of being built out.
- 3.7 Parcel KIV11 is described in the following terms:

“The LCP comprises a number of regular shaped fields subdivided by hedgerows containing prominent hedgerow trees. The land is gently undulating with an overall fall from west to east towards the settlement edge. The eastern edge of the LCP is provided by the rear gardens of residential dwellings in Windsor Crescent with the northern boundary being White Hill. A significant area of woodland known as Redcliff Covert is located immediately beyond the southern LCP boundary and wraps around to the west. The remainder of the western boundary is formed by the end of a ribbon development along White Hill. The

Staffordshire Way crosses east-west the southernmost field. A small complex of pre-20th century buildings is located in the north eastern corner of the LCP.”

- 3.8 Landscape sensitivity to housing development is stated to be ‘Medium’. It then goes on to justify this evaluation:

“The LCP is subject to significant urban influences and is completely contained by built form on the northern and eastern boundaries with further built form along part of the western boundary. The LCP has visual appeal and there are views to the south to a wooded backdrop. The hedgerow between the two fields in the northern part of the LCP is a significant feature as are its hedgerow trees.”

- 3.9 The South Staffordshire Landscape Sensitivity Study Update (2017) then makes the following comments on any proposed residential development:

“Any development would need to be located in the western part of the site to protect skyline and to follow the topography of the LCP. The PRow (Staffordshire Way) would need sufficient stand-off from development and could form the basis for on-site open space provision. This would also create a buffer area between any development and Redcliff Covert.”

- 3.10 Based on the above considerations, the illustrative masterplan for the delivery of the site’s residential development fails to sufficiently accord with the prevailing landscape character and that of the surrounding context and is concluded to over-estimate its development capacity, most specifically in respect of the following:

- The design response to the Staffordshire Way would result in a major permanent and irreversible adverse effect. If the removal of the appreciation of the site and the surrounding context is deemed acceptable by the local authority, development would need to be provided with a greater setback and any crossing of its course should be limited to a single point, with private drives fronting or rear-served houses;
- The development proposals do not provide a sufficient off-set space to the western boundary, which includes trees subject to Tree Preservation Orders (TPO). Moreover, the masterplan does not illustrate root protection areas (RPA), which means that private drives would most probably need to be pulled back once the RPAs are included; and
- Should the development and the degree of harm to the character and appearance of the area be deemed acceptable in principle by the authority, the development should have a far stronger green link north to south to link the phases together.

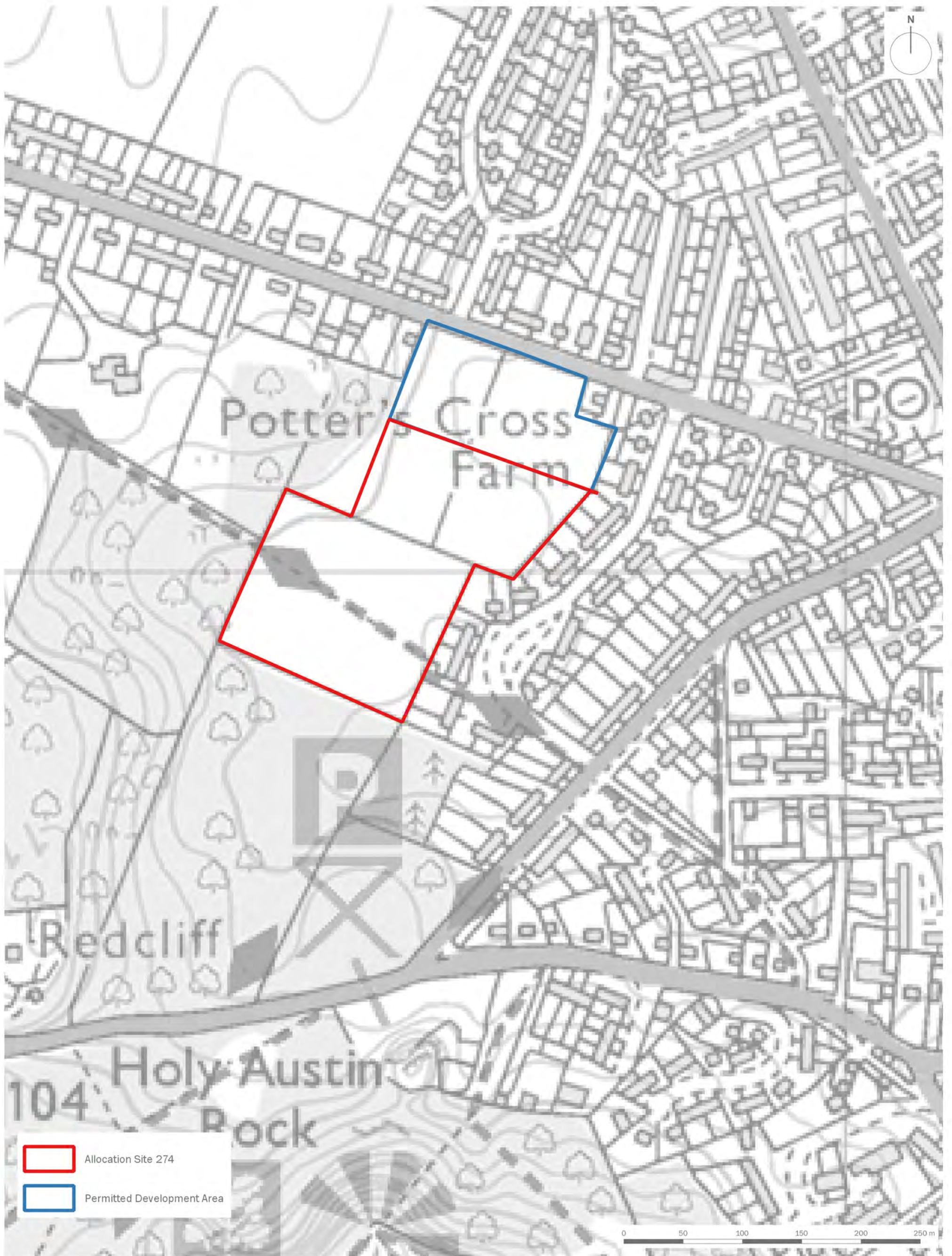
- 3.11 In practical terms therefore, in order to avoid an unacceptable level of harm to the character and appearance of the area, the extent and quantum of development would need to markedly be reduced.

4 CONCLUDING REMARKS

- 4.1 First of all, in terms of heritage matters, the “*less than substantial harm*” that development of the site would cause to Kinver Camp Scheduled Monument is not an ‘in principle’ barrier precluding the allocation of the site through the emerging Local Plan process.
- 4.2 Nevertheless, paragraph 205 of the Framework advises that South Staffordshire Council should afford the “*greatest weight*” to the conservation of Kinver Camp Scheduled Monument as a designated heritage asset of the highest significance, whilst the subsequent paragraph 206 highlights that “*clear and convincing justification*” should be provided for that harm, public benefits notwithstanding.
- 4.3 Therefore, and to accord with the Government’s guidance set out in the NPPF, the Council should look carefully for alternative sites at Kinver, which could come forward and deliver the same public benefits (in terms of delivering much needed housing) with less harm to designated heritage assets, before pushing ahead with the proposed allocation of a site where its promoters themselves acknowledge there would be “*less than substantial harm*” caused to a designated heritage asset.
- 4.4 In landscape terms, to accord with the local planning authority’s evidence base and the prevailing landscape and visual character of the site, the extent of residential development currently illustrated is considered to represent an over-estimation of the sites development capacity in landscape and visual terms.
- 4.5 Although construction on safeguarded land from a previous Local Plan has been permitted, it is an entirely different issue to continue that development onto adjacent land to the south, even if that would appear logical and convenient from the local authority’s standpoint. Instead, the Council should treat every site on its individual merits and there is no argument to persist with harmful development for ease and convenience, so instead less harmful or non-harmful options elsewhere around the town should be pursued first.

Plans

Plan EDP 1: Proposed Allocation Site 274 and Permitted Development Area
(edp4711_d006 22 May 2024 CJo/ACr)



Allocation Site 274
 Permitted Development Area

**Appendix 9: Kinver Parish Council's minutes of
the meeting held on 14 December
2022**

MINUTES OF THE PLANNING AND DEVELOPMENT COMMITTEE MEETING HELD ON THE 14th DECEMBER 2022 AT 7.00 PM AT 95 HIGH STREET, KINVER

Present: Councillors: Mrs C Allen (Vice Chairman), E Simons, K Slade, G Sisley, S Anderson, P Wooddisse and Ms E Lord.

Also in attendance Clerk Mrs J Cree.

1. APOLOGIES FOR ABSENCE

To accept apologies of absence from Councillors H Williams (Chairman), JK Hall (Ex-Officio) and K Hosell.

2. TO RECORD MEMBERS DECLARATIONS OF PECUNIARY INTEREST

Cllr Ms E Lord declared a Non-prejudicial interest in relation to planning application 22/01047/TTREE.

Cllr P Wooddisse declared a Non-prejudicial interest in relation to planning application 22/01107/TREE.

3. TO APPROVE THE MINUTES OF THE PREVIOUS MEETING HELD ON THE 9TH NOVEMBER 2022

The minutes of the meeting held on the above date were approved and signed as a true record of the proceedings of that meeting.

4. TO NOTE ANY ENFORCEMENT / CORRESPONDANCE MATTERS RECEIVED

None were reported.

5. PLANNING APPLICATIONS

22/01055/TTREE Cliff Bungalow The Cliff Kinver
TPO No. 7/1961: T1, Fraxinus spp. (Ash) - Pollard to 3 metres. T2, Acer spp. (Sycamore) - Dismantle and remove. T3 + T4, Fraxinus spp. (Ash) x 2 - Dismantle and remove.

Refer to the Arboricultural Officer

22/01038/TTREE Hunters Lodge Little Oaks Drive Lawnswood
TPO No. 42/1979: T1, Castanea spp. (Sweet Chestnut) - Reduce lateral branches by up to 3 metres to establish 2 metres clearance from main dwelling.

No objection.

22/01060/FUL 18 Compton Road Kinver
Proposed rear flat roof dormer

Recommend Approval

22/00871/FUL Lawnswood Farm Lawnswood Road Lawnswood
Conversion of existing building with rear extension to form three bedroomed detached dwelling with parking and amenity areas.

Application withdrawn

22/01053/FUL Iverley Park Farm Norton Road Iverley
Double storey extension

Recommend Approval subject to complying with Greenbelt regulations.

22/01080/FUL 58 Hyperion Road Stourton
First floor side extension / single storey rear extension

Recommend Approval

22/01107/TREE Land To The Rear Of Kinver Library Vicarage Drive Kinver
Kinver Conservation Area: Re-coppice previously coppiced trees

No Objection to the removal of the trees

22/01125/FUL Elan Hunters Ride Lawnswood
Single storey rear/side extension, alterations to existing roof scape and remodelling to front elevation

We have concerns over the impact on the street scene and over development of the site.

22/01132/TTREE 7 Pavilion End Prestwood
TPO No. 77/1985: T1, T2 and T6, Betula spp. (Silver Birch) x3 - Dismantle and remove. T3, Castanea spp. (Sweet Chestnut) – Crown Reduction by up to 30%. T4 and T5, Betula spp. (Silver Birch) x2 - Crown Reduction by up to 30%. T7, Acer spp. (Sycamore) - Dismantle and remove. T8, Pinus spp. (Pine) - Dismantle and remove

Refer to the Arboricultural Officer.

22/01047/TTREE Heathermount Farm 164 Enville Road Kinver
TPO No. 19/1965: Tree 1, Betula spp. (Birch) - reduce height by 50%. Tree 2, Betula spp. (Birch) - dismantle and remove

Refer to the Arboricultural Officer

22/01112/TTREE 4 Wicket Lane Prestwood
Proposed: TPO No. 77/1985: T1, Betula spp. (Silver Birch) - Dismantle and remove

Refer to the Arboricultural Officer but we would prefer to see the tree managed as opposed to being removed.

22/01077/FUL Kinver High School Enville Road Kinver
To install an all weather canopy, to safeguard our students, to use outdoor space in all weathers Location:

Recommend Approval

22/01133/FUL The Outbuilding Lawnswood Farm Barns Lawnswood Road Lawnswood
Single storey extension to provide a porch and study

Recommend Approval

22/00845/FUL Deerhurst Sugarloaf Lane Iverley
Proposed extensions to dwelling together with extension of existing garage and relocated driveway.

Recommend approval subject to the application does not contravene greenbelt regulations.

6. PLANNING DECISIONS REACHED BY SOUTH STAFFORDSHIRE DISTRICT COUNCIL

The Planning decisions are set out as appendix 1 to these minutes were noted.

7. TO DISCUSS ANY FURTHER ACTION REQUIRED FOR THE NEIGHBOURHOOD PLAN

The next stage is Regulation 16 which was agreed by the Parish Council. Members thanked Cllr Ms E Lord for all her hard work in getting the project to this point. This was noted.

8. TO RECEIVE APPEAL NOTIFICATIONS AND DECISIONS

The following appeals were noted:-

Appeal for 10 Castle Street, Kinver – proposed detached carport and storage

2 Brindley Brae, Kinver, - construction of a three bedroom bungalow, parking and associated works

20/00565/TTREE - Montague House Lawnswood Road Lawnswood

9. TO DISCUSS A RESPONSE TO THE LOCAL PLAN CONSULTATION AND SEND COMMENTS DIRECTLY FROM THE COMMITTEE WITH DELEGATED AUTHORITY FROM THE PARISH COUNCIL TO MEET THE 23RD DECEMBER DEADLINE.

The draft response is attached as appendix 2 to these minutes. It was proposed by Cllr S Anderson and seconded by Cllr E Simons to submit the document to SSDC as attached as appendix 2 to these minutes and Cllr S Anderson and the Clerk will submit the relevant forms. This was agreed on a vote to be sent to the District Council by the deadline of the 23rd.

10. ITEMS FOR FUTURE AGENDA

To be with Clerk by the 3rd January 2023.

11. DATE OF NEXT MEETING

The date of the next meeting is the 11th January 2023 at 7.00pm.

12. RECOMMENDATIONS TO THE PARISH COUNCIL

There were no recommendations to the Council all planning recommendations will be put forward to the District Council.

Appendix 1 to the minutes of the Planning and Development Committee held on the 14th December 2022

22/00824/FUL 61 White Hill Kinver

Withdrawn by applicant

Demolition of the existing stable block and detached double garage at the rear of no.61 and the erection of a two bedroom detached bungalow.

22/00856/FUL Jubilee House High Street Kinver

App

Rec App

Single storey side and rear extension. Modifications to existing rear outhouses. Demolition of rear chimney. Installation of roof-lights to rear facing roof.

22/00730/FUL 1 Broadacres Close Prestwood

Ref

Rec App

Retrospective planning permission for a garden shed placed on land outside of the lawful residential garden.

21/11/22

Appendix 2 to the minutes of the Planning Committee held on the 14th December 2022.

Appendix 2 to the minutes of the Planning Committee held on the 14th 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.

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.

Questions to be answered on the submissions

Is it legally compliant – yes (but a third option should be don't know)

Is the plan sound – no (comments)

Does it comply with the duty to cooperate – no (comments)

**Appendix 10: Representations to Policy NB6A:
Net Zero New Built Residential
Development (Operational Energy)
and Policy NB6C: Embodied Carbon
and Waste**

South Staffordshire Local Plan Regulation 19 Local Plan Representations

Representations on behalf of Bellway in respect of the Council's sustainability policies.

May 2024

Introduction

These representations have been prepared in response to South Staffordshire Council's Regulation 19 Local Plan consultation on behalf of Bellway with regards to the Council's Sustainability policies.

Bellway recognises the implications of climate change and has a proactive approach to design to ensure development mitigates and adapt to climate change. We support measures to reduce carbon emissions through both construction and operation and recognise the Council's ambition in setting policies which go beyond national requirements.

However, any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment. In this context we have a number of concerns with regards to a number of requirements set out in the Council's sustainability policies. Our response to these policies is set out below.

Draft Policy NB6A: Net Zero New Built Residential Development (Operational Energy)

While we support the Council's ambition for delivery of net zero homes, we have some concerns over requirements of *Policy NB6A*.

Overarching Carbon Reduction

It is considered that any feasible and viable policy should be restricted to regulated energy only. As a housebuilder Bellway only has the ability to influence the regulated energy demand of homes through design and specification of materials and systems, and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately the function of the residents' use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to reduce or offset emissions from residents' unregulated energy use is not appropriate.

Post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. We consider it unreasonable to assume that a housebuilder could influence such demand or should effectively meet the cost of mitigating carbon from a resident charging their electric vehicle.

The FHS and FBS consultation¹ states, *'We consider that metrics which include unregulated loads are not a suitable because designers and housebuilders have little or no control over these end uses of energy.'*

Furthermore, points A2-A4 of the Policy refer to regulated energy only, therefore, in this context and to maintain consistency, any requirements which go beyond national standards should only relate to regulated energy.

Energy Efficiency

We agree with the Council's Policy requirement to achieve regulated carbon emissions reduction through energy efficiency features. However, any emissions reduction targets should be in line with the latest national standards, for example the forthcoming 2025 Future Homes Standards.

It is also important to note that as part of the FHS and FBS consultation from December 2023 the Government has reiterated its strategy to not set any specific energy performance targets at this time, instead focussing on improvements in carbon reduction.

In addition on December 13th the Government released a Written Ministerial Statement (WMS)² 'Local Energy Efficiency Standards Update', which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national policy.

The WMS states, *'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*

¹ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

² <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

- *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).'*

In this context we would recommend that the Policy is updated to only reference alignment with the 2025 Future Homes Standard requirements.

Renewable Energy Supply

We support the Policy's requirement on provision of renewable energy generation to help reduce carbon emissions. We would note that the FHS and FBS consultation includes requirements for the provision of Solar PV on new development from 2025. We are, however, cautious over a requirement to achieve a 100% reduction in TER via onsite generation.

The Options Appraisal to inform Policy NB6 prepared by Bioregional states that *'the prescriptive nature of such policies may not be applicable for all sites and can occasionally lead to the installation of inefficient onsite renewables. Some sites may not be able to meet a very high requirement for renewables, such as if they are overshadowed (meaning solar PV panels would not work well), or if it is a tall building where there is a larger amount of internal floor space demanding energy but a relatively smaller roof space for PV'*.

In addition, maximising the provision of renewable energy could lead to unintended consequences or contradictions in design. For example, where development aims to respond to the character of the local area maximising onsite generation would likely mean covering available roof space with Solar PV, precluding the provision of roof lights, dormer windows etc which would otherwise be part of the design aesthetic of the development.

With regards to the renewable energy target of 120kWh/yr/m² of building footprint we do not believe this is an achievable objective. For context below a worked example is included:

Example – 90m² three bedroom house
 Footprint - 45m²
 Energy demand required (based on 120kWh/m²/yr) – 5,400kWh/yr
 Energy generated / kWp of Solar – 850 kWh/kWp
 System size required– 6.4kWp
 Area of PV /kWp – 5m²/kWp
 Area of PV required – 32m²

As set out above, to meet this target, a typical three bedroom house would require around 32m² of PV. A typical three bedroom house has at most c.32m² of roof space,

reducing to c.24m² of available space when taking into account areas around the edge of the system. This is significantly less than the roof area available.

Other development types may include dormer windows, roof lights etc to provide a mix of design which is keeping with the design and character of the area, therefore, setting this best practice requirement will stifle design and the character of development.

In this context, we would recommend that the Policy wording here is updated to achieve net zero regulated carbon emissions where this is feasible and viable, in line with latest national policy requirements and the reference to the energy generation target is removed as it is technically not achievable.

Offsetting

We broadly support the addition of a mechanism to offset residual carbon emissions provided that the scope and cost of such a policy has been tested. We agree that offsetting payments should be linked to the Government's Green Book carbon pricing and should take account of grid decarbonisation.

However, we do have concerns that the policy refers to both regulated and unregulated emissions for the reasons outlined above, therefore, we suggest that the Policy is amended to offsetting remaining regulated emissions only.

In addition, we do have concerns that a viability assessment for offsetting costs has not been undertaken due to the following reason set out in the Options Appraisal prepared by Bioregional: *'In the context of the South Staffordshire recommended offset approach for new residential development, offsetting does not need to be considered in viability assessments because the price set is equal to the cost of on-site measures and therefore does not represent an additional cost to the developer.'*

As set out above, the on-site measures only are unlikely to achieve net zero development, therefore, we consider Bioregional's conclusion inaccurate and a viability assessment for the cost of offsetting carbon has to be undertaken and included as part of the viability assessment for the Policy to be sound and deliverable.

Furthermore, the Policy needs to include reference to delivering the required carbon offset within a reasonable timeframe. The Council should set out its expectation on a timeframe for spending the funds collection. The National Planning Practice Guidance states, *'[S106] agreements should normally include clauses stating when and how the funds will be used by and allow for their return, after an agreed period of time, where they are not'* and, *'The Centre for Sustainable Energy notes that developers can ask for a refund of carbon offset payments that are unspent within 5 years.'* We would recommend the supporting text includes reference to the provision of a timeframe as above.

Post Occupancy Evaluation

We support the Council's requirement on monitoring and reporting energy use and renewable energy generation post-occupation, however, we are concerned over lack of clarity with regard to a sample size, which could potentially put a disproportionate burden on the housebuilder. As pointed out by the Options appraisal: *'the economy of scale would reduce the cost burden through sample testing only'*. We recommend that post-modelling is carried out on 10% of homes only as per the previous draft policy wording and recognised by the Council as *'a minimum sample size to gain knowledge on the performance of the development, whilst not being overly onerous on developers.'*

Viability

The viability of Policy NB6A is set out in the 'South Staffordshire Council Local Plan Review: Sustainable Construction Policy NB6, Task A, Rev 3.0', which notes that primary evidenced cost uplift data for South Staffordshire wasn't produced provides. Instead, cost uplifts are set based on the national and local government cost sources.

The evidence base includes FHS Impact Assessment 2019 and Currie & Brown (C&B) 2021 report for Cornwall Council's Development Plan Document Evidence Base. In addition, cost evidence bases for recent energy-based local plan policies in Greater Cambridge, Central Lincolnshire, Essex and a collection of London boroughs were utilised to assess cost uplifts for a range of potential South Staffordshire policies.

While evidence has been gathered from a number of sources the cost analysis from the 2023 FHS consultation has not been considered. The cost uplift included in the report noted above and the February Addendum which considers the Government's WMS note uplift costs of 2.6% and 2.9% respectively. However, the Government's FHS consultation notes a cost uplift of 1% for Option 2 and 4% for Option 1. If Option 1 is selected this cost is significantly higher than the 2.9% assumed, and does not include the additional offsetting costs.

Therefore, it is not clear how relevant this assessment is for South Staffordshire Council, as no specific costing exercise for South Staffordshire Council has been undertaken.

For the reasons as set out above, we consider there to be a number of potentially significant omissions from the viability assessment that justifies Policy NB6A and therefore recommend that the Council reviews the assessment to ensure it is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).

Recommended Policy Updates

Below we have set out some recommended amendments to Policy NB6A.

A1. Overarching carbon reduction

New residential development of 1 or more homes shall achieve net zero regulated ~~and unregulated~~ carbon emissions, **where feasible and viable**, through the application of requirements A2 – A4 laid out below.

Regulated carbon emissions should be calculated with SAP10.2 or any more recent replacement methodology.

The regulated carbon reduction should be achieved through on-site measures, unless this is demonstrated to the council's satisfaction that it is unviable or unfeasible with reference to site-specific factors.

A2. Energy efficiency

A **63%** reduction **in regulated carbon emissions in line with the latest national regulations on the Part L 2021 TER (regulated carbon emissions)**, is to be achieved through energy efficiency features.

Alternatively, where Passivhaus certification is proposed (or a space heat demand of $\leq 20\text{kWh/m}^2/\text{year}$ and a total energy use intensity of $\leq 45\text{kWh/m}^2/\text{year}$) and the proposal is fossil fuel free, the applicant will not need to submit SAP calculations. In that case the applicant's Energy Statement should instead cite their PHPP calculations, and a condition will be set requiring evidence of fulfilment on completion.

A3. Renewable energy supply

Subsequent to point A2, a further reduction **of to net zero** regulated carbon emissions **in line with the latest national regulations** is to be achieved through on-site renewable energy generation and/or connection to a certified renewable or low-carbon (fossil-free) local energy network.

Where it is proven unfeasible or unviable to include enough on-site renewable energy to achieve a 100% reduction in TER in this way, and this can be demonstrated to the council's satisfaction with reference to site-specific factors, the applicant will first demonstrate inclusion of as much renewable energy as feasible and viable, then address the remaining regulated carbon emissions by offsetting as per point A4.

Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.

~~Proposals are encouraged to demonstrate that the amount of on-site renewable energy generation equates to $\geq 120\text{kWh/m}^2$ projected building footprint/year.~~

A4. Offsetting

*Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve the requirements of A3 above, any residual carbon emissions from regulated ~~and unregulated~~ energy are to be offset via a Section 106 financial contribution reflecting 30 years of the building's operation **and linked to decarbonisation.***

Funds raised through this policy will be ring-fenced and transparently administered by the Council to deliver a range of projects that achieve measurable carbon savings as locally as possible, at the same average cost per tonne. Funds will be spent within 5 years of collection or returned to the developer.

A5. Reduced performance gap

Applicants are encouraged to submit, alongside their SAP figures, a set of total energy performance predictive calculations using Passivhaus Planning Package (PHPP), CIBSE TM54, or other method demonstrably proven to produce accurate predictions of total in-use energy.

An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

A6. Smart energy systems

Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.

Where the on-site renewable energy generation peak is not expected to coincide with sufficient energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for (and where appropriate implemented) energy storage and/or smart distribution systems.

A7. Post-occupancy evaluation

*Large-scale development (over 50 homes) should monitor and report total energy use and renewable energy generation values **for 10% of the proposed dwellings** on an annual basis for 5 years from first occupation. An outline plan for the implementation of this should be submitted with the application. Monitored data are to be reported to the local planning authority.*

Draft Policy NB6C: Embodied carbon and waste

We fully support the Council's objective to address embodied carbon and waste. With the introduction of the 2025 FHS and FBS, the operational emissions of development will continue to decrease, increasing the proportion of emissions which relate to construction and the embodied carbon of materials.

At this stage the embodied carbon of new development is not considered as part of the Building Regulations, however, as part of the FHS and FBS consultation the Government has requested information on embodied carbon and it is likely that embodied carbon will be included in the future.

While we support the Council's requirement for new developments to be supported by a Whole Life Cycle Assessment, we are concerned about setting any fixed targets. Currently the Building Regulations do not set a specific requirement for embodied carbon.

A number of guidance documents including the LETI Design Guide and RIBA 2030 Climate Challenge strategy set out potential embodied carbon targets, however the potential deliverability and viability of tackling embodied carbon is largely unknown at this stage. Reducing embodied carbon requires changes to design and specification of materials, often for more expensive materials. The London Plan which typically sets out targets ahead of other Local Authority plans currently only requires developers to assess embodied carbon and does not yet set any specific targets.

In addition, as recognised by LETI Design Guide and RIBA 2030 Climate Challenge strategy, the embodied carbon of residential and non-residential buildings differs significantly, therefore, setting a single target for various development types is not appropriate.

In addition the South Staffordshire Council Local Plan Review: Sustainable Construction Policy NB6, Task A, Rev 3.0 report sets out no costs associated with the requirements of NB6C and no costs are included within the Viability Assessment to take account of potential cost implications of this policy. In this context we do not believe this policy has been adequately tested to meet the requirements of the NPPF and Planning Practice Guidance (PPG).

We therefore recommend that the Policy is updated to reducing embodied carbon where feasible and viable and removing the fixed target to ensure the policy is effective and deliverable.

Recommended Policy Updates

Below we have set out some recommended amendments to Policy NB6C.

C1. Embodied carbon reporting

All new residential and non-residential developments are encouraged to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance.

C2. Limiting embodied carbon

Where feasible and viable, Large-scale new residential (50 and above units) and non-residential (5000m² commercial floorspace) development to ~~limit~~ **reduce** embodied carbon (RICS modules A1 – A5) ~~to 550 kgCO₂/m² GIA.~~

C3. Building end-of-life

All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

C4. Demolition audits

All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE).

Development proposals should be consistent with other Local Plan policies.

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