

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

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

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

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Jessica"/>
Last Name	<input type="text"/>	<input type="text" value="Graham"/>
Job Title (where relevant)	<input type="text" value="Barratt West Midlands"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="Savills (UK) Limited"/>
Address Line 1	<input type="text"/>	<input type="text" value="55 Colmore Row"/>
Line 2	<input type="text"/>	<input type="text" value="Birmingham"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="B3 2AA"/>
Telephone Number	<input type="text"/>	<input type="text" value="0121 634 8494"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="jgraham@savills.com"/>



Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

We **object** to Draft Policy SA3 and consider that Land to the North and South of Dunsley Road, Kinver (site references 549 and 550) should be allocated for residential development.

As our responses to Draft Policies DS4 and DS5 state, we object to the proposed spatial strategy and level of growth being directed to Tier 2 settlements, particularly the sustainable settlement of Kinver. Kinver is the most sustainable settlement in the southern part of the district with good access to the Black Country and therefore additional housing growth should be directed to this settlement. Draft Policy SA3 only allocates one site for residential development in Kinver, and as stated in our response to Draft Policy DS5 this is not a sustainable approach to distributing growth within the south of the district.

Barratt is promoting land to the north and south of Dunsley Road, Kinver (both parcels are shown within the submitted Vision Document). The northern parcel (SHELAA reference 549) is approximately 13 hectares (32 acres) and is bound by Dunsley Road to the south, Dunsley Hall to the east, the Staffordshire and Worcestershire Canal to the north and residential dwellings to the west. The southern parcel (SHELAA reference 550) is approximately 3.5ha (9 acres) and is bound by Dunsley Road to the north, residential dwellings and the Staffordshire and Worcestershire Canal to the west and agricultural fields to the east and south. The Sites could deliver circa 350 market and affordable dwellings as well as a potential community use and public open space.

Site 549 has been assessed by the Council as "NCD1 – Sites potentially suitable for housing but not currently developable because of a policy designation" and Site 550 has been assessed as 'NS – sites which are unsuitable because of constraints which cannot be overcome'. The 2024 Housing Site Selection Topic Paper states that sites assessed as 'NS' were not assessed in Stage 3 of the site selection process. The key constraint identified within the SHELAA 2021



for Site 550 was that it is 'disassociated from any village development boundary'. Although the site is not immediately adjacent to the adopted settlement boundary, the site is adjacent to existing residential properties so it is not disassociated from development.

As Site 549 was assessed as 'NCD1' in the SHELAA 2021, it has been further assessed in the Topic Paper 2024 and Sustainability Appraisal ('SA') 2024. The key constraints noted in Appendix 2 and 3 of the 2024 Topic Paper are the loss of agricultural land and no access to the wider village via a pedestrian footway. There is an existing informal footway along the southern boundary of the site which is used by existing residents. Barratt consider that, subject to further discussions with the Highway Authority, there is potential to formalise the existing footpath up to Hampton Grove where the formal footpath currently commences and provides a pedestrian link along the northern side of Dunsley Road to the village centre. Although comments have been made on the footpath, nothing has been stated about the site's close proximity to bus stops or its assessment in Appendix 2 of the RSFA 2021 as more accessible by bus than the western part of Kinver where sites are proposed to be allocated.

The reason for rejection of the site reference 549 provided in Appendix I of the Sustainability Appraisal (2024) states the site is "not consistent with the Council's preferred spatial strategy and the findings of the site assessment process do not indicate that the site performs so well as to warrant departing from the preferred strategy". The Topic Paper 2024 also states that the reason for lack of Green Belt allocation in Kinver is that the Council's preferred spatial housing strategy does not include releasing Green Belt in Kinver. As stated earlier and in our response to Draft Policy DS5 Barratt objects to the proposed spatial strategy and consider that more growth should be directed to Kinver.

In summary, the Sites are located on the edge of Kinver's settlement boundary and it is considered that they are easily accessible to the shops, services and facilities provided within Kinver as well as the wider transport network linking the site to Stourbridge. A range of technical work has been undertaken to support the promotion of the sites and assess the impact of any future development on the landscape, local highways network, ecology, trees and adjacent heritage assets. The submitted Vision Document sets out further information on the development proposals.

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

More growth should be directed to Kinver as one of the most sustainable settlements in the District which is currently only being the focus of very limited growth. Sites referenced 549 and 550 are considered to be in a sustainable location and should be released from the Green Belt and allocated for development.



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

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

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

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

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

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

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

To provide oral evidence and engage in the Examination discussions on this matter.

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

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

Data Protection

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

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