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17th May 2023

Dear Ms Burden,

RE: KINVER NEIGHBOURHOOD PLAN EXAMINATION – SOUTH STAFFORDSHIRE DISTRICT COMMENTS ON KINVER PARISH COUNCIL RESPONSE TO EXAMINER'S QUESTIONS

Further to the letter which we submitted on 05 May 2023 responding to your questions regarding the Kinver Neighbourhood Plan, we have now had the opportunity to read the responses provided by Kinver Parish Council and would wish to comment on a number of aspects of the Parish Council submission. We are particularly concerned with the response of the Parish Council in respect of Policy KN02 clause 1a. South Staffordshire Council is of the view that the identification of small settlements as potential locations for housing growth is contrary to adopted strategic policy and therefore fails to meet this neighbourhood plan basic condition. We would be grateful if you would take account of the following concerns when producing your recommendations:

Policy KN02 Clause 1a

The Parish Council have re-affirmed their commitment to promoting housing growth in the settlements of Lawnswood, New Wood and Stourton. South Staffordshire Council consider that this approach directly conflicts with the spatial strategy as identified in Core Policy 1 (CP1) of the adopted Core Strategy. The Core Strategy focusses growth in the most sustainable locations within the district, an approach which underpins the spatial hierarchy identified in policy CP1.

Lawnswood, New Wood and Stourton are not named settlements within the hierarchy and would therefore be classified as 'Other Villages and Hamlets'. The Core Strategy policy CP1 states that development in such areas 'will only be permitted in exceptional circumstances for the provision of rural affordable housing'. The approach promoted in the draft Neighbourhood Plan policy KN02 would represent a considerable relaxation of a key element of the local plan strategy by fostering growth in less sustainable villages and hamlets.

Policy KN02 Clause 1e

The Parish Council have reiterated their support for brownfield development. This support should be qualified to take into account the site suitability and location. To be consistent with NPPF para 80, housing growth in isolated locations should be avoided.

Policy KN02 Clause 4

South Staffordshire Council restates the comments submitted at the Reg. 16 consultation with regards to the most appropriate mix of housing tenures. It is important to note that the evidence base study



undertaken by AECOM for the parish council does not exclude consideration of the provision of social rented properties from the future housing mix in the neighbourhood plan area. The AECOM study also notes (para 64) that it is important to ensure that departures from district-level policy context have the LPA's support. Clause 4 as proposed is neither in conformity with the adopted Core Strategy Policy H2, nor does it suitably reflect the latest housing needs evidence for the district or Kinver specifically.

Policy KN07 Clause 7

South Staffordshire Council would wish to reiterate comments made at the Regulation 16 consultation regarding the purpose of policies relating to the natural environment and how these are distinct from Green Belt policy functions.

Policy KN08 Clause 1

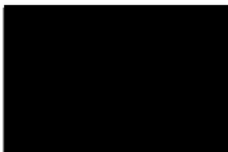
The NPPF makes a clear distinction between the approach to be applied to listed buildings and to non-designated heritage assets. This distinction is not reflected in the wording of the neighbourhood plan as presently drafted and it is considered that the policy fails to have regard to national policy.

Policy KN11

South Staffordshire Council does not believe that a clear indication of local benefit has been provided which would justify the identification as Local Green Space of extensive areas of open countryside which are already designated as Green Belt. It is considered that a significant number of the sites identified failed to satisfy the criteria to be designated as Local Green Space and should therefore be deleted from the plan prior to being submitted to referendum.

We hope you find these additional comments on our concerns helpful, as regards the above aspects of the neighbourhood plan as it is presently drafted. We would be happy to assist in responding to any further questions you may have following the receipt of this letter.

Yours sincerely



Strategic Planning Team Manager – South Staffordshire Council