

Kinver Neighbourhood Development Plan

Summary of representations received by South Staffordshire Council (SCC) during the Regulation 16 consultation and submitted to the Independent Examiner pursuant to paragraph 9 of Schedule 4B of the Town and Country Planning Act 1990.

The table below is a summary of the representations received. Full versions of the representations are available on the council website – [Kinver Neighbourhood Plan | South Staffordshire District Council \(sstaffs.gov.uk\)](https://www.sstaffs.gov.uk/kinver-neighbourhood-plan)

Organisation	Date Received	Comments & Suggested Amendments
Barratt West Midlands	02/03/2023	<p>Policy KN02 Amend part 2 of the policy to state that housing mix be determined on a site by site basis. Amend policy to include all types of affordable housing.</p> <p>Policy KN04 Neighbourhood Plan should take a flexible approach when determining suitability of materials. Amend policy wording to replace 'must' and 'should' with 'where possible' to enable more flexibility.</p> <p>Kinver Design Code Amend densities to provide a larger range of densities. No evidence has been provided to justify a lower than average density requirement. Retain option for 2.5 storey maximum building height. Proposed space standards are not in accordance with basic conditions Would welcome clarification on whether modular house type arrangement is fixed.</p> <p>Policy KN05 Energy use reduction exceeds current regulations and is onerous and unjustified.</p> <p>Policy KN07 The plan should be flexible in relation to BNG to adapt to changing national guidance on this issue.</p>

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		<p>Remove reference in supporting text to 20m buffer zone around wildlife sites.</p> <p>Policy KN10</p> <p>Amend policy to state that hard standing be kept to a minimum 'where possible'.</p> <p>Policy KN11</p> <p>Welcome further engagement to discuss proposal K03.</p> <p>Policy KN12</p> <p>Parts 5 and 8 repetitive, delete one of them.</p> <p>In relation to mobility scooters change wording from 'must' to 'where possible'.</p> <p>Amend part 6 to more clearly align with the Core Strategy.</p>
British Horse Society	23/02/2023	<p>Policy KN01</p> <p>Amend to include reference to equestrian tourism.</p> <p>Policy KN04</p> <p>Include equestrian use alongside plans for cycle/walking paths. These should be multi-user routes. New cyclepaths should be shared with other user groups.</p> <p>Policy KN06</p> <p>Include commitment to protect PRoW.</p> <p>Policy KN12</p> <p>The policy excludes equestrians and other vulnerable road users. Policy should be inclusive of all vulnerable road users.</p>
Canal and Rivers Trust	27/02/2023	No comment to make.
Savills obo Clowes Development	06/03/2023	<p>Add paragraph numbers to the plan document.</p> <p>Policy KN02</p> <p>Section 2 of policy should allow greater flexibility for housing need to be determined by market demand at time of application and site specific circumstances.</p> <p>Section 4 should be expanded to include all types of affordable housing.</p> <p>Policy KN04</p> <p>Clause 4 – open space types should be decided on a case by case basis.</p> <p>Clause 7 – case by case basis should be used for assessing the suitability of certain materials.</p> <p>Clause 8 – possible tension between use of trees for landscaping/environmental benefits and highways authority stipulations.</p> <p>Clause 10 – provide greater clarity on 'gaps of sufficient width'.</p>

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		<p>Policy KN05 Clarify which regulations. No evidence to justify the approach being proposed by the Neighbourhood Plan.</p> <p>Policy KN07 The plan should be flexible in order to adapt to changing national guidance. Object to supporting text suggestion of 20m natural habitat buffer. This has not been evidenced.</p> <p>Policy KN10 Object to comment that developments are thought to have aggravated flooding problems. Where is the justification? Clause 3 – what is the minimum area and how is it to be defined.</p> <p>Policy KN11 Site K24 does not meet NPPF standards for LGS designation.</p> <p>Policy KN12 Section 6 – plan should define what is ‘adequate’ . Section 7 – what is ‘sufficient’.</p> <p>Kinver Design Code Object to density measure of 20dph Object to restriction to 2 storey maximum Guidance on architecture may hamper ability to deliver a mixed community Reference to cul-de-sac streets and secured by design can conflict with well connected legible environments. Advocate a balanced approach to secure design Object to blanket approach with respect to Lifetime homes standards Site by site assessment should be used with respect to carbon reduction approaches. No evidence has been provided with respect to energy performance standards for new housing. Design code is insufficiently nuanced to reflect differentiation between areas.</p>
Coal Authority	03/03/2023	No comment
Zesta Planning obo Completelink	06/03/2023	<p>KN01 There is an opportunity to expand Prestwood House Care Home & Estate which would increase employment opportunities. Policy interpretation does not need to restate the need for Green Belt protections.</p> <p>KN02</p>

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		<p>Policy does not outline where and how specialist accommodation will be delivered to meet the significant local needs.</p> <p>Unnecessary to restate the need for Green Belt protections.</p> <p>Specific allocations will be required to support the expansion of specialist housing provision.</p> <p>KN12</p> <p>Request acknowledgement that expansion of existing specialist care accommodation can be acceptable outside of defined settlement boundaries as such facilities have fewer vehicular movements.</p> <p>New policy – Potential New Green Belt/Site Specific Policy</p> <p>Include a policy to support the need for specialist accommodation and care facilities including expansion of existing facilities and site specific allocations. A site specific policy for the growth of Prestwood House Care Home & Estate should be introduced.</p>
Dudley MBC	09/02/2023	Proposed allocations and draft policies are considered unlikely to have any significant impacts on the strategic planning objectives of Dudley Borough.
Edward Marsh Centre		<p>KN11</p> <p>Welcome the inclusion of Sterrymere within K06 Edward Marsh Playing Fields</p> <p>Pg54 Conservation Map</p> <p>Delete Conservation Area buffer zone.</p> <p>Pg55 Delete photo which gives impression Edward Marsh Centre was flooded.</p>
Enville & Stalybridge Estates	02/03/2023	<p>KN11 KO2</p> <p>Insufficient evidence of local importance as a local green space allocation.</p>
Farrier, P.	05/03/2023	<p>More employment opportunities and facilities required for local people.</p> <p>Character of village being undermined by additional housing provision.</p>
Fuller, J.	24/01/2023	Ridgehill Wood should not be identified for development.
Hereford & Worcester Scout County Council	05/03/2023	<p>KN11 KO15</p> <p>Object to inclusion of Kinver Scout Training Camp as a Local Green Space proposal, site does not meet LGS requirements.</p>
Moore, S.	27/01/2023	<p>KN02</p> <p>Make sure definition of 'infill' is unambiguous in relation to Lawnswood.</p> <p>KN11</p> <p>Include land between Hunter's Ride, Lawnswood farm, Lawnswood and 2 proposed LGS K24/K25 as an additional LGS.</p>
National Highways	08/02/2023	Support commitments to sustainable development.

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Owen, B	19/02/2023	Support policy KN12
Pickering, AM	02/03/2023	More affordable housing required. Special needs housing to be built concurrently with market housing.
Severn Trent	06/03/2023	No comments
Smith LE	04/02/2023	Kinver poorly served by services and facilities
South Staffordshire Council	14/03/2023	<p>KN01 Lack of clarity in relation to the terms 'development' and 'around'.</p> <p>KN02 Policy should prioritise use of sustainably located brownfield land. Policy should more closely align with Core Strategy CP1. Lack of evidence to support 'Rent to Buy', replace with shared ownership. No evidence to suggest to viability of affordable rented homes in addition to other affordable tenures.</p> <p>KN04 What is sufficient in terms of gap of sufficient width.</p> <p>KN06 Clarify that preference is for limited infill within sustainable locations.</p> <p>KN07 Reference to no overall harm is contrary to NPPF Amend reference to replacement trees to take account of trees/hedgerows of poor quality. Maintaining separation is a Green Belt policy function not natural environment policy.</p> <p>KN08 Clarify if policy relates to listed or non-designated assets Policy should be amended to reference preserving/enhancing historic building character. Clarify wording regarding opportunities for canal conservation enhancement Pg52. Comment re: replacement of historic windows is factually incorrect.</p> <p>KN11 Remove K01-K09; K11; K12; K14; K17-K20; K22-K30</p> <p>KN12 Policy requirements unclear – is the policy requiring a separate dedicated cycle storage. What would constitute adequate parking provision. Improve precision with respect to EV charging points.</p>

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Sport England	20/02/2023	KN03 Object. Policy does not set out that the replacement provision should be equivalent quantity and quality in line with NPPF para 99b. With regard to loss needing to be evidence based policy wording should reflect 99a.
Staffordshire County Council		KN11 Object to following LGS proposals – K07, K08, K09, K14.
Takhar, B.	31/01/2023	KN02 Concern that the Lawnswood Gap may be used as a housing site. The Lawnswood Gap should be identified as a green space.
Woverley & Cookley Parish Council	08/02/2023	Support Kinver Neighbourhood Plan.
Ministry of Defence	06/03/2023	MOD may have interest in types of development which are likely to have an impact on operational capability in areas outside of designated safeguarding zones. This is frequently associated with wind turbine and solar PV developments.
National Gas	07/03/2023	No assets currently affected by proposals.
National Grid	02/03/2023	No assets currently affected by proposals.
Natural England	09/03/2023	No specific comment