

South Staffordshire Local Plan examination – matter 5 (spatial strategy)

Bellway Homes Limited (sites at Hyde Lane and Dunsley Drive, Kinver)

April 2025

Introduction

1. This statement is submitted on behalf of Bellway Strategic Land ('Bellway') in response to the Inspector's matters, issues and questions to the South Staffordshire Local Plan.
2. Bellway is promoting two sites at Kinver for residential development, land at Hyde Lane (site ref: 274) and Dunsley Drive (site ref: 576). Details regarding both sites can be found in Bellway's representations to the reg 19 publication plan.
3. We have responded to the questions most relevant to Bellway's interests at Kinver.

Issue 1 Questions

Q1: how was the settlement hierarchy derived? When qualifying your answer, is the methodology used to determine the hierarchy appropriate and sufficiently robust?

4. This is set out in the Rural Services and Facilities Audit (2021) (EB15). Appendix 5 of the audit provides a scoring matrix. Kinver scores the highest (similarly to Wombourne and tier 1 settlements) for access to education. There is no clarity as to whether any measuring metric has been given more weight than any other.
5. Para 3.24 of the audit confirms education is the third biggest generator of trips. To reflect this access to education should have been given greater weight than other measuring metrics, in determining the sustainability of a settlement.
6. In any case, Kinver's provision of services and facilities, as well as its proximity and good public transport links to the wider urban area (such as Stourbridge) demonstrate the village has greater capacity for housing growth.

Q2: how was the level of development anticipated in different settlement categories been derived? Does the settlement hierarchy appropriately reflect the role and function of these settlements?

7. See our response to Q1 above.

Q3: in terms of the distribution of housing and employment development across the plan area:

a. is it clear how and why the preferred spatial strategy has been selected?

b. what options have been considered for accommodating the identified development requirements in a sustainable manner? Have reasonable alternatives been considered?

c. are the areas identified for new development the most appropriate locations? Is the rationale behind choices and reasoning for conclusions clear and justified by the evidence? How have the locational needs of different sectors been addressed.

d. what roles have the Sustainability Appraisal and Viability Study had in influencing the spatial strategy?

8. The starting point is the district's total housing need. As set out in our Matter 3 and 4 hearing statements, South Staffordshire should be planning for a significantly greater scale of housing. In response Kinver has a greater capacity for accommodating housing growth than proposed. As much is demonstrated by the Council's previous approach in the 2022 reg 19 publication plan where Bellway's site at Hyde Lane, Kinver (site ref: 274) was proposed for allocation. The 2024 Sustainability Appraisal (EB2) demonstrates the sustainability of the site in its scoring matrix (table N.6).
9. Notwithstanding the above, even if South Staffordshire's total housing need is not increased, it is still capable of accommodating a greater distribution of the district's total growth, as per our response to Q1.
10. Should the decision be made not to increase South Staffordshire's housing requirement to align more closely with NPPF 2024 local housing need ('LHN') and the increased housing needs across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') then land at Hyde Lane (site ref: 274) and Dunsley Drive (site ref: 576) should be identified as safeguarded land for future development needs (an approach taken by the current development plan), to de-risk the plan, as per our Matter 4 and 6 hearing statements.

Issue 2 Questions

Q1. Is the approach taken in the plan sound, and:

a. Taken as a whole and in view of gaps in the Infrastructure Delivery Plan about project costings and timescales, what evidence supports a conclusion that the growth proposed by the Plan is deliverable when anticipated in terms of infrastructure capacity?

b. How has the availability of key public services influenced the selection of the preferred Spatial Strategy been considered?

11. No comment.