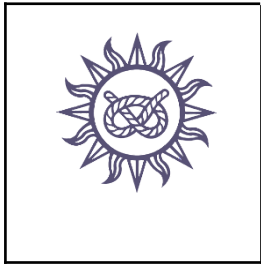




Data Protection



Local Plan  
Publication Stage  
Representation Form

Ref:  
  
(For  
official  
use only)

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	Ms	
First Name	Kia	
Last Name	Hunt	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		



# Part B – Please use a separate sheet for each representation

Name or Organisation: Kia Hunt

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

Paragraph	5.7 (Pages 25-26)	Policy	Policy DS3 – Open Countryside	Policies Map	Page 235 Site ref 036c
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4. Do you consider the Local Plan is :

(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" 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 checked="" 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.



The proposed development at site 036c is unsound and fails to comply with policy DS3 regarding open countryside.

Quoting paragraph 5.7 of the plan (pertaining to Policy DS3) of the plan:

- *"Equally important to **maintaining the special character of South Staffordshire** is having a policy framework for protecting the Open Countryside located to the northwest of the district beyond the Green Belt. Whilst not having the same level of national protection as Green Belt designation, **the land designated in the Local Plan as Open Countryside is still much valued countryside particularly for its landscape and ecological qualities.**"*

The proposed site at 036c is **classical rolling countryside**, which has also been identified by council consultancy as being of **high landscape sensitivity**, it is an important part of Stafford's landscape character and provides not only an excellent vista, but also a green space between the developments of Stafford and Acton Trussell. The Publication Plan claims a 'small' number of 81 houses will negate negative impacts, but this cannot consciously be argued as even 81 will have a massive impact on land identified as high sensitivity. Moreover, 81 is only a 'minimum', with no defined border of physical feature, meaning the likelihood is that if site 036c is permitted, the developers will press for more houses, with our independent advisor suggesting that the site may at first increase to 200 houses, then again up to a potential 2000 (!) houses if the initial site is accepted. This site is essentially the beginning of **destroying the only green space left between those two settlements**, effectively joining them together and destroying a large part of important open countryside.

Though not directly in opposition to a specific policy, it is also important to note here how **the character of this classical rolling countryside positively contributes to the community of Wildwood**. As residents we have chosen to live here on the edge of our borough in the 'Wild wood' - situated next to the countryside, admiring the trees that our roads and houses have been named after: Spinneyfields, Larchwood, Maplewood, Wrenswood, etc. This site not only **breaches the Open Countryside policy by failing to maintain the special countryside and valued landscape of this site**, but it would **also cause massive negative (and unnecessary) impact to the residents of this area**, their recreation and their mental health by taking away the nature that they appreciate so much, myself included.

Though I appreciate it is unusual to add an image to an objection document, I feel it is important for the inspector to see the land being discussed. These images, taken by me, show the proposed site 036c from the aptly named part of Wildwood:

**Fieldside:**



This is the vista that welcomes residents of Wildwood home when they arrive, **the landscape character and assets are an important part of our quality of life.** I'd like to note one specific resident I speak to, an elderly resident who has very limited mobility, who told me that this vista of open countryside is all she has, it is her only connection to nature and it brings her joy to look at it because she is unable to go out of her house.

It's important to clarify that I do understand that houses must be developed somewhere, however the lack of need for this development and the fact that SSDC is extending inwards from their boundaries instead of outwards from their settlement means that **there can be no justification for the destruction of open countryside in this particular site.**

Quoting from Policy DS3 of the plan:

- *"The Open Countryside contains many sensitive areas, including its landscapes and areas of **ecological, historic, archaeological, economic, agricultural and recreational value. The council will protect the intrinsic character and beauty of the Open Countryside [...] would not harm the intrinsic character and beauty of the Open Countryside.**"*

Again it is clear that the proposed site 036c is **in breach of policy DS3** as it not only **fails to protect the intrinsic character, beauty, and recreational value** of the Open Countryside (as mentioned above) but it **also threatens to harm the ecological and agricultural value** of the land:



- **Ecological value:** The site **036c is noted for its diversity of wildlife.** 34 species of birds are seen on a regular basis, together with deer, [REDACTED] bats and hares. **It is an important wildlife and biodiversity link** between the Cannock Chase AONB and the Staffs and Worcester Canal and the River Penk valley to the West. Connectivity is established as important in the Staffordshire Wildlife Trust Biodiversity Report, which appears to have been ignored in the Plan in respect of site 036c. **The proposed development at site 036c would cause destruction of ecological assets and biodiversity.** The land is also within the Special Area of Conservation of the Cannock Chase AONB - this conflicts with policy EQ2 of the SDC SAC CANNOCK CHASE SPECIAL AREA OF CONSERVATION (SAC) GUIDANCE TO MITIGATE THE IMPACT OF NEW RESIDENTIAL DEVELOPMENT (MARCH 2022) which states that the '*Development will only be permitted where it can be demonstrated that it will not be likely to lead directly or indirectly to an adverse effect upon the integrity of the Cannock Chase Special Area of Conservation (SAC).*' The site 036c is an important part of the continuity of Open Countryside between Cannock Chase AONB and the important Valley of the River Penk. Mitigation, as permitted in the SAC, by way of '*access management and visitor infrastructure, publicity, education and awareness raising; and provision of suitable alternative natural green recreational space, within development sites where they can be accommodated and where they cannot by contributions to offsite alternative green space.*' will be unable to mitigate the impact on wildlife movements between these important sites, **thus causing irreparable damage to the ecological value of the site and of Cannock Chase AONB.**
- **Agricultural value:** SSDC's Publication Plan states "*All types of development in the Open Countryside which are not explicitly supported by Policy DS3 will be considered on a case-by-case basis. Such proposals will **only be permitted where they are not located on best and most versatile agricultural land** and are fully consistent with any other relevant policies set out elsewhere in the Local Plan*" However, site 036c is productive farmland, classified by SSDSC consultant Lepus in their Report Regulation 19 SA Report October 2022 LC-829\_Vol\_2of3\_Reg19\_SA\_South Staffs\_20\_121022LB.docx in Fig 14.1 as Grade 3, but transitioning to Grade 2 towards the village of Acton Trussell. It is understood from the Tenant Farmer (Parrott family) that **the land is very productive, it is Grade 3a** - meaning that the proposal of this site would mean **the loss of versatile land with significant agricultural value.**

The reasons mentioned above are **evidence that proposed development 036c fails to comply with strategic policy DS3: Open Countryside and also breaches strategic policies NB1: Protecting, enhancing and expanding natural assets, NB2: Biodiversity Strategic Strategic, NB3: Cannock Chase SAC AND NB4: Landscape Character.** Not only is it highly inaccessible to ask that objecting residents complete a separate Part B of this document for every Policy that site 036c of this plan breaches (because it breaches so many), I believe it is also an insult to the Inspector's intelligence and a waste of their time to assume they cannot see how the evidence for the breach of one policy (in this case DS3) also overlaps with the breaching of other policies (such as NB1, NB2, NB3 and NB4). For this reason I ask that you consider the above details as evidence for how site 036c breaches multiple policies pertaining to landscape and ecology.

(Continue on a separate sheet /expand box if necessary)



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.

I ask the Inspector to address the matters above and **as part of a duty to protect Open Countryside with special character, significant beauty, and outstanding ecological, agricultural and recreational value**, to delete, in its entirety, the planned development at location 036c.

Even though the Publication Plan in question exceeds the district housing requirement of 4,086 houses by over 15% (not 10% as quoted), I understand that an alternative is sometimes needed when requesting for a proposed development site to be removed from the plan, which is why I would recommend that the area surrounding Penkridge be looked into as an alternative if necessary, as this was outlined as an area for strategic development in policy SA2 - it would not breach duty to co-operate as it is not situated on the border of a neighbouring district with already strained infrastructure.

(Continue on a separate sheet /expand box if necessary)

**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:

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I consider it necessary to attend the hearing to ensure that the breaches of policy are heard and considered by the inspector.

This is especially important because site 036c has been objected to and rejected multiple times in the past, I would like to attend the hearing to ensure that the inspector notes that past objections still stand, and that the very significant number of voices in the community who had given their time, energy and financial support to have their objections heard are not ignored.

My attendance at the hearing will likely be represented by an expert whom we have funded as members of the opposing resident community.

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](mailto:localplans@sstaffs.gov.uk) or by post to South Staffordshire Council, Community Hub, Wolverhampton Road, Codsall, South Staffordshire WV8 1PX**