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SECTION 60 OF THE PLANNING ACT 2008

LOCAL IMPACT REPORT [LIR] PREPARED BY SOUTH STAFFORDSHIRE DISTRICT COUNCIL [SSDC]

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Applicant: Highways England (HE)

Proposal: Construction of M54 to M6 Link Road

September 2020

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1.Purpose of the Report

Highways England (the applicant) has submitted an application under Section 37 of the Planning Act 2008 (as amended) for an order to grant development consent for the M54 to M6 Link Road.

This report has been written by South Staffordshire District Council and provides an evaluation of the local impacts of the M54 to M6 Link Road, in relation to construction, operation and maintenance of the new road. The report has been prepared in accordance with the Planning Inspectorate Advice Note on Local Impact Reports and the published guidance of the Planning Officers Society.

The report comments on the principal issues relevant to SSDC as identified in the EA's Rule 6 letter issued on 25th August 2020 and therefore aims to assist the ExA by identifying local issues which are of concern to the District of South Staffordshire.

Staffordshire County Council (SCC) has prepared their own LIR to identify local issues that are more appropriately addressed at a wider spatial scale by the 'upper tier' authority (County of Staffordshire). These issues mainly focussing around HGV movements along the A460, noise, landscape, residential and visual amenity. There has been close working between SCC and SSDC in the preparation of the 2 LIRs (which should be read together) as creating a comprehensive picture of the local impact of the DCO proposal.

2.Site Description and Surroundings

The site is located within the county of Staffordshire and the district of South Staffordshire between the national and regional routes, the M54, M6 and the existing A460. The DCO Scheme is within the administrative boundary of local authorities SCC and SSDC with a very small area of the Order limits within the City of Wolverhampton Council (CWC).

The site is within the West Midlands Green Belt, in a predominantly rural area consisting mainly of mixed agricultural land and scattered woodland. A large proportion of the site area is bound by existing highway network and lies north and north west of Featherstone, south of Little Saredon, south east of Great Saredon and approximately 1-1.5 miles west of Cheslyn Hay.

The nearest residential areas include the villages of Shareshill to the north-west, Featherstone and Hilton to the west and the Hamlet of Little Saredon to the northwest. The residential area of Bushbury (a suburb of Wolverhampton) is located to the south of M54 Junction 2. There are a number of more isolated residential properties and farm holdings in the locale of the Scheme area,

for example a farm and a small group of residential properties at Laney Green, north of M6 Junction 11, Brookfield Farm south of M6 Junction 11 and Tower House Farm north-east of M54 Junction 1.

The proposed DCO boundary encompasses sections of the M54, M6, A460, A462, and local roads: including Hilton Lane and Dark Lane which are both crossed by the proposed link road. Hilton Cross Business Park and an Industrial Estate lie to the immediate north of the M54 Junction 1 and just fall outside of the site area, that said areas of Dark Lane, Hilton Lane, along with the Historic Park land in association with Hilton Hall fall within.

Within the application site area list several environmental constraints and designations that will be identified and discussed in detail throughout the latter section of this report.

3.Details of the proposal

Highways England state within their application there is no direct strategic route from the M54 to the M6 North, they too explain in detail that road users wanting to access the M6 north or M6 Toll have to use local roads such as the A460 and other nearby roads. This results in a large volume of local and long-distance traffic using the A460 which is operating at capacity. This traffic flow passes through the villages of Featherstone, Hilton and Shareshill. The A460 has just one lane in each direction with numerous junctions and stretches of road with a 30mph speed limit. This road was not designed for the amount and type of traffic currently using it and results in delays, congestion and accident rates above the national average. It is therefore proposed that the new link road will alleviate these capacity issues and improve connectivity. It is anticipated that investment in additional capacity will support local economic growth for South Staffordshire and surrounding areas being Telford, Shrewsbury, Wolverhampton, Cannock and Tamworth

Summary of the Proposed Development

- Replacement of the existing M54 Junction 1 with free flow slip roads between the new link road and the M54. This would allow the free flow of traffic between the M54 and the new link road in both directions and maintain connectivity with the existing local road network, via three new roundabouts.
- Construction of a new dual carriageway between M54 Junction 1 and the M6 Junction 11. The alignment of the carriageway would be located to the east of the existing A460 and the villages of Featherstone, Hilton and Shareshill and west of Hilton Hall.
- Dark Lane would be stopped-up between the final property and the junction with Hilton Lane.

- The realignment of Hilton Lane on a bridge over the mainline of the Scheme. The bridge would be reconstructed on a similar alignment and would provide enough clearance for the new road.
- Provision of an accommodation bridge and access track across the mainline of the Scheme to retain access to severed land to the east of the Scheme. The route of the new link road would then continue north to the east of Brookfield Farm to link into the M6 Junction 11.
- Enlargement of the M6 Junction 11 signalised roundabout to accommodate a connection to the new link road and realign existing connections with the A460 and M6. Two replacement bridges would be required over the M6 to provide an increase in capacity from two lanes to four lanes of traffic on the roundabout. This work would raise the height of the junction by approximately 1.5m.

Primary Objectives of the Scheme

Highways England state the primary objectives of the M54 to M6 Link Road Scheme are to:

1. Relieve traffic congestion on the A460, A449 and A5, this will provide more reliable journey times.
 2. Keep the right traffic on the right roads and improve safety by separating local community traffic from long distance and business traffic.
- B) Reduce volumes of through-traffic in villages, improving local community access.
- C) Support local economic growth for Telford, Shrewsbury, Wolverhampton, Cannock and Tamworth by improving traffic flow and enhancing access to east-west and north-south routes.

These are some of said benefits that the Transport Assessment Report Provides:

In summary, the Scheme would:

- Reduce travel times along the existing A460 for local residents' journeys.
- Reduce the times for strategic east-west journeys.
- Attract trips onto the Scheme's new dual carriageway road that would otherwise travel on less suitable roads.
- Improve the environment for walkers and cyclists on the existing A460.
- Increase the capacity of the strategic road network to absorb the forecast traffic growth.
- Save a predicted 330 personal injury collisions over a period of 60 years.
- Provide a net present value benefit to the economy.
- Represent value for money.
- Improve the reliability of journeys.
- Improve the resilience of the road network.

- Facilitate regional development and employment growth.

4.Relevant Planning History and Proposals Under Consideration

The following planning applications are relevant material considerations:

-20/00281/FUL Brookfield Farm Cannock Road Shareshill – temporary change of uses to provide for siting of 4no. containers to accommodate feedstuffs including hay, in connection with agricultural and equestrian activities on the holding (Pending Consideration)

-20/00274/FUL Brookfield Farm Cannock Road Shareshill – temporary use of land for the siting of a mobile home and related structures including septic tank for occupation for the lifetime of Mr C J Evans only (Pending Consideration).

-17/00857/COU Brookfield Farm Cannock Road Shareshill - use of former blacksmiths forge to uses within B1(C) and B8 – approved with conditions 14th November 2017.

A site is being actively being promoted for employment land around Junction 11. However, preferred sites for employment land have not been selected yet as part of the Local Plan Review process.

5.Relevant Planning Policy

Policy Context

- Core Strategy 2012-2028
- Site Allocations Document (2018)
- Infrastructure Delivery Plan (2017)
- Planning Act 2008
- Localism Act 2011
- National Planning Policy Framework (2019)

The National Planning Policy Framework states that there is a presumption in favour of sustainable development. The purpose of this project is to improve capacity on the road in order to support the Government by delivering its presumption in favour of sustainable development through transport infrastructure.

Core Strategy

The Council's Core Strategy (CS) was adopted in December 2012 post introduction of the National Planning Policy Framework (The Framework) in March 2012. Since then, the Government has published a revised Framework (February 2019). The Council's Site Allocations Document (SAD) was adopted in September 2018. The adopted CS and SAD (together) comprise the Local Plan for South Staffordshire.

Staffordshire County Council is the local planning authority for Highways, Drainage, Minerals and Waste Disposal. Adopted plans and relevant policies in these topic areas will be therefore accordingly be presented in the County LIR. Therefore, as stated above both the South Staffordshire District Council LIR and SSC LIR should be read together.

South Staffordshire occupies a unique position on the edge of the West Midlands conurbation and whilst 80% Green Belt, it has an important role to play in achieving economic growth for the district and surrounding areas. ; The CS and SAD support strategic highway improvements, transport investment and making provision for schemes that advance local accessibility between homes and jobs across the District.

Due to the nature of the development and connectivity the scheme will deliver, it is considered that the enhancement works will have long term economic benefits for the sub-region.

Relevant Core Strategy (CS) Policies

The Spatial Strategy for the District is set out in Strategic Objectives 1 and 2, which seek to protect the Green Belt and aim to retain and strengthen the current pattern of development, together with Core Policy 1, which identifies how development will be focused in the most sustainable locations through the settlement hierarchy and confirms that the Green Belt will be protected from inappropriate development.

Policy GB1 sets out the circumstances where development is acceptable within the terms of national planning policy set out in the NPPF will be allowed in the Green Belt.

Core Policy 2 confirms that the Council will support development which protects, conserves and enhances the District's natural assets and this is expanded in Policy EQ1.

Policy EQ4 is clear that the intrinsic rural character and local distinctiveness of the District should be maintained and/or enhanced.

Core Policy 3 requires development to cater for the effects of climate change and minimise environmental impacts.

Policy EQ5 and EQ7 seek to ensure that impact on the environment is minimised and that proposals do not have a negative impact on water quality.

Policy EQ11 and EQ12 of the Core Strategy sets out that new development proposals should have regard to the existing landscape and its individual elements such as trees, amenity, its historic context, key views, public rights of way and biodiversity. Further details are subsequently set out in Core Policy 1: The Spatial Strategy.

The Core Strategy 2012 also has a section on Sustainable Transport (Core Policy 11) that supports this mode of transport to reduce congestion, improve accessibility, widen transport choice and improve road safety. The M54/M6 Link Road proposal is specifically mentioned in Core Policy 11 as a national and regional transport infrastructure schemes to be delivered in the plan period. Improvements to the transport and accessibility are also set out in the Core Strategy's Strategic Objective 13.

Core Policy 7 supports measures to sustain and develop the local economy of South Staffordshire, whilst Core Policy 9 supports the social and economic needs of rural communities within the District. Policy EV5 sets out the criteria where proposals for employment development outside development boundaries will be supported.

Policy EQ9 considers the amenity of residents near to proposed development, particularly with regard to privacy, security, noise and disturbance, pollution, odours and daylight.

Policy EQ10 seeks to protect the public, land uses and the natural environment from proposals which would be detrimental to public health or amenity.

Core Policy 13 supports initiatives that promote the safety of people, both in their own homes and in the community. In particular, the design of all developments must take account of the need to

reduce the opportunities for crime and fear of crime. Policy CS1 advises on ways this may be achieved.

The Site Allocations Document (SAD) was adopted in September 2018 and at Paragraph 9.22 reference is made to the proposed new northern motorway link and states 'Through the Local Plan review process and further cross-boundary employment land assessments, the Council will also consider the implications of the Highways England preferred solution (to be confirmed) to the proposed new northern motorway link road connecting the M54/M6/M6(TOLL). It is anticipated that a preferred route will be identified in 2018, following further consultation on the remaining two route options under consideration'.

Alongside the submission of the Site Allocations document was the Infrastructure Delivery Plan (IDP) dated August 2017. This document identified the necessary infrastructure required to support the Site Allocations, together with longer term and aspirational infrastructure projects. Within the IDP Transport section reference is made to Roads – Strategic and Local Highways Network and refers to the M56 M6 Link Road being required.

National Policy

The Council notes that the relevant national policy document that the Scheme must meet in terms of policy compliance is the National Networks National Policy Statement (NPS) - which the Secretary of State must have regard to in evaluating the merits of the Scheme. The purpose and scope of the National Networks NPS makes it clear that the overall strategic aims of the National Planning Policy Framework (NPPF) and the National Networks NPS are consistent, however, the two have differing roles to play. The NPPF is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project [National Networks NPS Paragraphs 1.17 – 1.18].

NPPF Policies Relevant to the M54 M6 Link Road

Revised NPPF 2019 was published by Government February 2019.

The National Planning Policy Framework states that there is a presumption in favour of sustainable development. The purpose of this project is to improve capacity on the road in order to support the Government by delivering its presumption in favour of sustainable development in particular through transport infrastructure.

At Paragraphs 5 & 6 it is stated that:

‘5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.

NPPF 2019 Section 9 – Promoting Sustainable Transport

Reducing congestion and carbon emissions is encouraged in NPPF 2019

‘103 The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximize suitable transport solutions will vary between urban and rural areas, and this should be taken into account in plan-making and decision-making.’

NPPF 2019 Section 14 – Meeting the challenge of climate change, flooding and coastal change

The planning system should support the transition to a low carbon future in a changing climate:

‘149 Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures⁴⁸. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

NPPF 2019 Section 15 – Conserving and enhancing the natural environment

Minimising impacts and achieving net gains for biodiversity is encouraged in Paragraph 170:

‘170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

.....

d) minimizing impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

.....'

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality,

NPPF Section 4 – Decision-making

There are restrictions regarding what matters can be covered by Section 106 Agreements/Planning Obligations as set out in NPPF 2019 Paragraph 56

'56. Planning obligations must only be sought where they meet all of the following tests: -

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development'

6.Assessment of Prospective Impact of the Project

Highways England state the proposed scheme would take around 3 years to construct, from 2021-2024 and will inevitably result in a temporary increase in traffic movements which will have a varying degree of impacts on the environment. The impacts can be separated into two phases, these being construction and operational, the latter referring to the permanent effects once the scheme is completed and is operational motorway. The level of impact will be considered further in this report however the loss of Green Belt will be discussed first.

Green Belt

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 146 of the NPPF states local transport infrastructure which can demonstrate a requirement for Green Belt location is not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.

Loss of Green Belt openness

The Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is important to consider which of the 5 Green Belt purposes (set out in NPPF Chapter 13 Paragraph 134) are engaged by the Link Road Scheme.

The M54 M6 Link Road scheme area is not located on the built-up edge of the West Midlands conurbation; and neither, by being a linear highway route is it the type of development that would typically merge built up areas together. The road would lie north of Wolverhampton, about 0.5 mile east of Featherstone and about one mile south of the village of Sharesill. The application site would occupy agricultural land for majority of its length between the long established transport routes being the A460 and M6; the site is contained within strategic roads boundaries that comprise the M6 Motorway and A460 Junction 8 Roundabout (to the north), the A460 (to the west), the M6 (to the east) and the M54 (to the south). Other associated works would site immediately adjacent to existing slip roads.

The proposal would create some encroachment into the countryside and therefore this Green Belt purpose is without doubt fully engaged in the consideration of the M54 M6 Link Road Scheme. That said there are no historic towns within the local environs of M54 M6 Link Road site therefore this Green Belt purpose is clearly not engaged. Neither would the proposal assist in Urban Regeneration. The proposed Link Road scheme therefore conflicts with c) safeguarding of the countryside from encroachment and is therefore deemed as inappropriate development.

Paragraph 133 of the NPPF confirms that the essential characteristics of Green Belts are their openness and permanence. Advice published by the Ministry of Housing, Communities and Local Government in July 2019 states that the following factors should be taken into account when considering the potential impact of development on the openness of the Green Belt:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remendability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation

Whilst the proposal would involve wide scale excavation/construction works along with traffic movements across hectares of agricultural land that is currently open and (in essence) free of built development, the road itself would remain low level (albeit associated infrastructure such as lighting , gantries and barriers etc) and would therefore retain some feeling of openness between the nearby areas and existing roads. Whilst there would be some closer proximity visual impacts, planned biodiversity off setting and new planting is proposed to soften and reduce such impacts. However, for the above reasons I conclude having assessed its limited spatial and visual effects the proposal would still represent inappropriate development in the Green Belt and should not be approved except in very special circumstances (NPPF 2019 Paragraph 143).

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (NPPF 2019 Paragraph 144 and National Networks NPS Paragraph 5.178).

Harm to Green Belt

In conclusion, harm to Green Belt interests arises from inappropriateness, some loss of openness, and harm to individual Green Belt purposes. The specific purpose that suffers harm in the case of the proposed Link Road is that of safeguarding the countryside from encroachment. Each of these components of Green Belt harm – inappropriateness, loss of openness and encroachment, attract substantial weight in the ‘planning balance’ of this planning decision.

Noise and Amenity

The key policy within NPSNN of relevance to this assessment is in paragraph 5.195 that states:

‘The Secretary of State should not grant development consent unless satisfied that the proposals will meet the following aims, within the context of Government policy on sustainable development:

-Avoid significant adverse impacts on health and quality of life from noise as a result of the new development.

- Mitigate and minimise other adverse impacts on health and quality of life from noise from the new development.

-Contribute to improvements to health and quality of life through the effective management and control of noise, where possible.’

The construction and operation of the Scheme will have an impact on residents in a way of noise and vibration via a range a of sources associated with the building a new ling road. Whilst some would be short/temporary impacts, others will have longer term implications. These have been quantitatively measured and assessed together with a collection of what are appropriate mitigation measures.

The Environmental Statement identifies residential properties are concentrated in the built-up areas of Featherstone and Hilton, with smaller areas of residential properties located closer to the Scheme in Dark Lane, Park Road, Hilton Lane and Brookfield Farm. It too refers to non-residential potentially sensitive receptors including educational buildings, medical buildings and community facilities that are concentrated in Featherstone and Shareshill; it too refers to Moseley Old Hall being open to the public and located to the south of the M54 just beyond the western end of the Scheme.

It is said there will be significant adverse construction vibration effects for receptors near to the Dark Lane turning head, along Hilton Lane (east and west of the Scheme) and at Brookfield Farm. Additionally, significant adverse construction noise effects at the closest receptors to the construction works in the vicinity of Dark Lane, Hilton Lane (east and west of the Scheme) and Brookfield Farm.

That said mitigation measures have been incorporated into the design and some of these include maximising the depth of the cuttings in particular at Hilton Lane, maximising the distance between the eastern end of Dark Lane and the Scheme, the use of a thin surfacing system which results in lower levels of noise generation than a standard hot rolled asphalt surface at speeds at and above 75 km/hr; reduction of the speed limit on Hilton Lane; extension at the eastern end of the existing earth bund on the north side of the M54 eastbound off slip and inclusion of various noise barriers to reduce the magnitude of the impact at Featherstone, Dark Lane/ Park Road, Brookfield Farm, and Wolverhampton Road to the north of M6 Junction 11. The inclusion of the identified mitigation measures detailed demonstrates the Scheme is said to meets the requirements of the NPSNN aims.

It is understood (at a later date) that further consultation will take place regarding detailed plans for construction; South Staffordshire District Council welcome such and will seek to ensure that cumulative impacts of the construction of other local schemes are included, and that roads outside of the planning area are taken into account, including the A460 south of the scheme into Westcroft, and north of the M6 towards Cheslyn Hay. South Staffordshire District Council also invite HE to explore future opportunities to improve local amenity for local people, particularly pedestrian safety

in the communities closest to the construction activity. For example, implementing a pedestrian crossing in Westcroft, a cycle path from the north and improving footpath conditions and signage in Featherstone.

Dark Lane

It is noted that during construction Dark Lane receptors would view elements and activities associated with the scheme i.e. soil stripping, vegetation clearance, cranes and noise would be large in terms of change, these would give rise to visual amenity impacts and include views of the general construction in what currently is a country road enclosed by a hedge, fence and woodland associated with Hilton Hall. Such would pose a significant adverse effect however such would be for a short/temporary term.

Following completion and when proposed planting is well established (approx. year 15) views towards the scheme would be filtered and partially screened by maturing landscape mitigation, which would also filter views of moving vehicles. It is not thought the change in traffic noise level is anticipated to adversely affect the existing noise levels. In terms of visual effects, year 1 the impact on existing views is said to be significant that said the magnitude of change is said to reduce due to maturing landscape mitigation and result in a moderate adverse impact. With regards to those properties in closer proximity to the link road, mitigation in the form of an approximately 3.0 m high reflective noise barrier (on the west side of the main line) is proposed. Similar fencing is also proposed where the road passes close to Brookfield Farm, yet approximately 2.5 m high.

Having consulted the Environmental Health Team, no reasons for objection have been raised.

Air quality

The assessment submitted states that air quality standards are unlikely to be breached in Dark Lane, although air quality levels are likely to deteriorate due to the proximity of the proposed road, for that reason there is concern. That said Highways England state there would be no significant effect on air quality during construction and operational stage. Whilst no comments or evidence to the contrary have been made by the Councils Environmental Health Team South Staffordshire District Council would like to see working practices put in place that prevent/reduce construction noise and dust presented within a Construction Environmental Management Plan - to be consulted on and agreed prior to any commencement of construction.

Discussions have been had with the Council's Environmental Health Team with regards to noise and residential amenity and whilst the Council remain concerned that some residents will be adversely affected during and after construction we acknowledge the wider positive benefits a scheme of this kind would deliver. Therefore, we seek reassurance that this is the best alignment for the community, that the necessary mitigation is put in place and that noise and vibration monitoring is reviewed/continues during construction and following completion.

Landscape Character and Visual Amenity

The majority of the Scheme lies within a triangle of land formed by the existing highway networks. It crosses several undulating fields – which are bounded by hedgerows – as well as running through woodland associated with the historic Hilton Park, and through riparian vegetation where it crosses existing watercourses. Transport and infrastructure elements influence the scheme area, particularly at its northern and southern boundaries. These elements include the M6 (6 lane motorway) and the M54 (a four-lane motorway), which divide the landscape, and add perceived highway influences. This effect is compounded by the busy A460 Cannock Road, which carries many cars and HGVs as they move between the M6 Junction 11 and the M54 Junction and therefore landscape value is considered to be low across numerous viewpoints

The land within the Scheme boundary is slightly undulating across its length, with ground levels typically between 130-145m (AOD). Ground levels in the wider study area include localised variations such as the hill on which the Grade II listed Portobello Tower stands (at 183 m AOD). Within the south of the study area, constitutes a Historic Landscape Area (HLA) as designated by South Staffordshire District Council and is subject to additional protection through the Adopted Core Strategy (Ref 7.5). HLAs were selected for the strong historic landscape character and the desirability of conserving and restoring it. There are no other local landscape designations within the study area.

Potential changes to landscape character and visual amenity would be apparent. However, with regard to some of the landscape character impacts, some would occur in areas deemed to be of low value i.e. adjacent to those travelling along the A460 experiencing relatively urban views, alongside some field/woodland that sit in close proximity to existing highway infrastructure. That said the scheme has been designed, as far as possible, to avoid and minimise impacts and effects on the landscape and visual environment. Several mitigation measures have been identified to reduce, remediate or compensate likely significant adverse environmental effects. These measures include some remodelling and woodland tree and shrub planting to help filter views.

The potential for early planting would be set out and the key locations for consideration are: either side of the Scheme to the north of Hilton Lane; to the west of the construction compound at Featherstone; and to the west of the Scheme adjacent to Brookfield Farm. This early planting would allow for visual effects to be reduced during construction and in Year 1, as the trees are more mature would filter views to the Scheme and its construction at an earlier stage. It is said the planting strategy for the Scheme has sought, where possible, to utilise trees, shrub and grassland species that would not only provide an essential landscape mitigation (screening and integration) function, but also offer wider biodiversity benefits.

With regards to detailed landscape design, this would be undertaken at a later stage and the mitigation design would be further detailed and refined during this process. The detailed landscape design would include planting plans and schedules, a specification and a Landscape and Environmental Management Plan.

Potential landscape and visual impacts associated with the construction and operation of the scheme have been assessed and are presented, along with viewpoint photographs within chapter 7 of the Environmental Statement. These locations for viewpoint photographs were agreed by the Landscape Officer at Staffordshire County Council and between November 2018 and August 2019 meetings and consultation events have been had and discussion around landscape mitigation, night-time view points and heritage viewpoints at Hilton Hall as well as further discussions for mitigation.

South east of Dark Lane will see new woodland planting. From viewing the plans however, it seems that the existing green unsightly fence will remain therefore we welcome the replacement of this fence with a more visually pleasing boundary treatment as part of the application.

Further woodland planting is also proposed to the south and south east of Featherstone residents, along with a reflective noise barrier.

Biodiversity/Landscape

Originally the field south of Dark Lane was to be planted however the recent Environmental Masterplans shows that this site is no longer within the Order Limits and therefore planting within this area is no longer proposed. The land north of Dark Lane was also to be planted with woodland entirely, however the recent Environmental Masterplan shows a significant reduction, this is somewhat disappointing. For further biodiversity gains along with improvements to landscape

character and residential visual amenity we request further woodland planting is reconsidered in line with the County Ecologists recommendations.

No international or national designated areas are identified within the scheme area. However, two Statutory nature conservation designations have been identified outside, these being, one SSSI and one LNR within 2 km of the Scheme boundary Stowe Pool and Walk Mill Clay Pit SSSI (only Walk Mill Clay Pit is within the study area). Other statutory designations lie between 1.5km – 9.5km from the scheme boundary. Non statutory nature conservation designations within 2km of the scheme boundary are Lower Pool, Hilton Park SBI and LWS and many others. There are also multiple blocks of woodland that are of local ecological importance and two parcels of ancient woodland present within and adjacent the scheme boundary.

South Staffordshire District Council will usually commission the County Councils Ecologist for comments on planning matters and applications. In this case however given the County Ecologist is commenting on the DCO on behalf of the County, we support their response and ask that section of LIR is noted and as stated earlier read in conjunction.

Historic Built Environment

No international or national designated areas (Scheduled Monument, World Heritage Site, SAC, SPA, SSSI, National Park or AONB) are located within the site area. However key historical buildings include (but are not limited to) the National Trust-owned and Grade II* listed Moseley Old Hall (to the south-west of the M54 Junction 1), the Grade I listed Hilton Hall and the Grade I listed Conservatory in its grounds (both to the south of Hilton Lane) and associated buildings, and the Grade II listed Portobello Tower (situated between the M54 and Hilton Hall). Hilton Hall is also surrounded by remnant parkland which contributes to its setting and character.

The Conservation Officer has considered the proposed plans and assessments and confirms no major concerns with regards to the impact upon the setting of the designated heritage assets. As mentioned, the Grade I listed buildings (Hilton Hall and The Conservatory at Hilton Hall) would be within relatively close proximity of the new road, however the proposed new road will not be visible from these assets. Also, whilst there will be additional road noise, this will be adding to an already existing background noise from the M54 to the south. No conservation objections are raised upon the proposed scheme. With regards to archaeological matters, the County's Archaeologist leads on this matter and we therefore have no comments to make.

Highways and transport

As lead specialists in such matters the County Council have considered highway implications throughout the DCO process and have frequently liaised with SSDC. Alike the County, SSDC do have some concerns that the proposed scheme could result in many HGVs continuing to use the A460. Both SSC and SSC consider there to be two situations when this may happen:

1. HGVs coming off the motorway to fuel at M6 Diesel filling station then carrying on the A460 to the next motorway junction.
2. During incidents or closures on/off the new link road - we would want to ensure HGVs to use the A5/A499 rather than reverting to the A460.

Therefore, a way to prevent HGVs using the A460 (after the new road is opened) to travel between the M6 jct 11 and M54 jc1 is sought. As it currently stands, the obvious route for HGVs approaching from the south wishing to access the Diesel truck stop is through Featherstone. A small measure that would prevent the likely scenarios is a weight restriction to be put forward as part of the scheme. It is our view the provision of a weighting restriction as well as improvements to the A460 by way of a designated cycle lane would also assist HE in meeting one of their primary objectives 'in keeping the right traffic on the right roads and improve safety by separating local community traffic from long distance and business traffic'.

Discussions have been had between SCC and Highways England however no further measures of this kind have been agreed or put forward. Therefore, whilst we are supportive of the scheme, this is one matter we aren't in agreement with.

Separately, yet highway related is some concern around the stopping up of roads (Mill Lane, Dark Lane and A460 at M54 Island) encouraging the likelihood of fly tipping. South Staffordshire District Council therefore request that any road to be blocked off is closed off with an appropriate gate, further discussions around successful measures to prevent fly tipping is sought along with additional planting to improve and soften closure views.

Flood Risk and Drainage

Flooding and drainage details along with mitigation has been assessed by the County Council. South Staffordshire District Council therefore have no comments to make and support their judgement.

Minerals and Waste

With the County Council leading on such matters we have no comments to make.

7 Proposed Changes

Highways England recently submitted 7 proposed changes to the scheme that have been accepted and consulted on. South Staffordshire District Council have reviewed the changes and consider them to be mostly minor in nature that will see improvements to the scheme. With regards to change 4 and the traffic management on the M54, we see this shorter period as a positive change, however, it will be necessary in the detailed Traffic Management Plan to engage with and take on the views of the local community and business on the precise details of the Plan. With regards to these changes comments around change 4 were made by the Environmental Health team, these highlighted that whilst the change was significant, it was temporary and therefore no objection.

Local Councillors and other relevant specialist officers were also notified for comments and no objecting statements were made.

8. Other matters

Outside of the above there are matters the Council seek clarification on, these being:

- whether a cycle provision/improvement will be made to the A460 (linking from the northern part of the existing A460 beyond junction 1 of the M54 motorway island near Mann and Hummel)
- whether work/jobs associated with the development would be offered locally first and how an agreement would be secured
- written confirmation that sections of mile wall to be removed (along the A460) will be reused near the junction with the Avenue Featherstone - as verbally agreed between Councillor Robert Cope and Highways England.
- the possibility of a financial contribution to the protection of the Portobello Tower in Hilton Historic Parkland grade II listed and Biodiversity funding to Hilton Green Environment Centre

7. Conclusion

SDDC supports the proposed link road in order to relieve congestion, improve journey time reliability, and support economic growth. Such support in principle is echoed in The Core Strategy, Site Allocations Documents and Infrastructure Delivery Plan documents and is specifically listed as a project being required.

The scheme would give rise to several impacts which is to be expected given the scale of the project proposed. These would be both short- and longer-term impacts on the local area in environmental means, from their potential to effect residential amenity and by changing the character and appearance of the area. There would also be social impacts from the proposed stopping up of roads and the diversion of existing roads and footpaths. With these in mind, South Staffordshire District Council considers that it is important to ensure that the scheme and any associated mitigation is delivered and reviewed in such a way to minimise those impacts. As such, further detail and clarification is required towards:

- resolution of the issue of a weight restriction which should be applied to the A460.

That said, SSDC recognises that the scheme will deliver economic benefits at a local, regional and national level. It is also accepted that on a larger than local scale [sub-regionally, regionally and nationally] benefits will arise from the Link road scheme due to reductions in congestion and air quality impacts associated with the existing A460 and surrounding roads. The scheme would generate other significant economic benefits through manufacturing, business administration, plant hire, long term servicing and employment. These benefits amount to positive impacts of the scheme. It is clear from the assessment of impacts substantial weight must be given to the harm caused to the Green Belt by reason of inappropriateness, the limited loss of openness and encroachment into the countryside. This is clearly a negative impact, that said the positives, in our view would clearly outweigh these.

Whilst the LPA supports the proposed link road and its benefits, we too acknowledge the negatives associated with the scheme and therefore ask all obligations/conditions required to mitigate any impact are appropriately set out and discussed.

a) Location Plan



NOTES

1. THIS DOCUMENT IS TO BE READ IN CONNECTION WITH ALL OTHER RELEVANT DOCUMENTS.
2. DO NOT SCALE FROM THIS DRAWING. USE ONLY PRINTED DIMENSIONS.
3. ALL DIMENSIONS ARE UNLESS OTHERWISE SPECIFIED AND COORDINATES ARE IN METERS AND DECIMALS THEREOF.
4. THIS DOCUMENT IS TO BE READ IN CONNECTION WITH THE PROJECT HEALTH AND SAFETY FILE AND EXISTING PICTORIAL RECORD.

KEY

- LIMITS OF LAND TO BE ACQUIRED OR USED PERMANENTLY OR TEMPORARILY FOR THE SCHEME LIMITS
- LAND NOT INCLUDED WITHIN THE SCHEME LIMITS

NO.	DESCRIPTION	DATE	BY	CHKD BY
1	ISSUED FOR INFORMATION	12/01/2024
2
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10

SUITABLE FOR INFORMATION

Highways England

 TR0 10054

M54 to M6 Link Road

THE ORDER LIMITS SCHEME WIDE

NO.	DATE	BY	CHKD BY	REVISION
1	12/01/2024	ISSUED FOR INFORMATION

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