

Consultation Report

The West Midlands Interchange Rail Freight Interchange Order 201X

Section 37 (3) (c) Planning Act 2008

Copper Consultancy - July 2018



West Midlands
Interchange

Four Ashes Ltd

The West Midlands Rail Freight Interchange Order 201X

Consultation Report

Document Reference 5.1

Section 37(3)(c) Planning Act 2008

July 2018

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1. Executive summary

1.1. Introduction

1.1.1. This report has been prepared on behalf of Four Ashes Limited (FAL) and is submitted pursuant to s37 of the Planning Act 2008 (the Act) as part of an application to the Secretary of State for Transport (via the Planning Inspectorate) for a Development Consent Order (DCO) for a new Strategic Rail Freight Interchange (SRFI), referred to as West Midlands Interchange (WMI). This document comprises the Consultation Report and details all pre-application consultation for West Midlands Rail Freight Interchange Order 201X (the Proposed Development).

1.1.2. WMI is a proposed SRFI broadly bounded by the A5 trunk road to the north (from Junction 12 to the Gailey roundabout); Calf Heath Reservoir, the M6, Stable Lane and Woodlands Lane to the east; Station Drive, Vicarage Road and Straight Mile to the south; and the A449 trunk road (Stafford Road), from the Gailey roundabout to Station Drive to the west (the Site). The south-eastern area of the Site is also bisected by Vicarage Road. A SRFI is a large distribution park linked into the strategic rail and road system, capable of accommodating warehouses for the storage and movement of goods for manufacturers, retailers and consumers.

1.1.3. The Proposed Development comprises:

- An intermodal freight terminal with direct connections to the West Coast Main Line (WCML), capable of accommodating up to 10 trains per day and trains of up to 775m long, including container storage, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities;
- Up to 743,200 square metres (gross internal area) of rail-served warehousing and ancillary service buildings;
- New road infrastructure and works to the existing road infrastructure;
- Demolition and alterations to existing structures and earthworks to create development plots and landscape zones;
- Reconfiguring and burying of electricity pylons and cables; and
- Strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas and publicly accessible open areas.

1.2. Pre-application consultation

- 1.2.1. FAL has sought to engage with affected communities and stakeholders from the outset when the Proposed Development was announced in April 2016. Engagement has continued throughout the pre-application process with residents, businesses, organisations, landowners (Persons with an Interest in the Land, PILs) and statutory stakeholders, in the form of individual meetings and correspondence.
- 1.2.2. Between 13 June and 24 July 2016, consultation was carried out on early-stage proposals with two Illustrative Masterplan options (East and West) (known as the Stage 1 Consultation).
- 1.2.3. A year later and following extensive development work, FAL undertook statutory consultation (known as the Stage 2 Consultation) from 5 July to 30 August 2017 on its detailed proposals with an Illustrative Masterplan and other relevant documents for the West option.
- 1.2.4. Following further detailed development of the proposals, focused consultation (known as the Stage 2a Consultation) was undertaken between 23 November 2017 and 2 January 2018 on two proposed changes to the Order Limits, north and south of the Site.

1.3. Response to pre-application consultation

- 1.3.1. FAL has made a significant number of changes to the Proposed Development in response to feedback received as part of the pre-application process. Feedback has influenced the choice of Masterplan options, the layout of the Proposed Development, proposals to mitigate potential environmental impacts, the boundary of the Consultation Zone, and improvements to the package of benefits being brought forward by FAL.

2. Introduction

2.1. The Applicant

- 2.1.1. The Proposed Development is being developed by Four Ashes Limited (FAL). FAL is led by Kilbride Holdings, a company specialising in rail infrastructure to serve business and industry. The Kilbride Holdings (Kilbride) team has developed rail-based projects for Jaguar Land Rover (JLR) in Halewood and Castle Bromwich, amongst others. Kilbride Holdings is one of three partners in FAL, along with privately owned international property group, the Grosvenor Group (Grosvenor) and Piers Monckton, who is the primary landowner.
- 2.1.2. The partners of FAL are committed to delivering a rail-served development which will bring significant sustainable social and economic benefits to South Staffordshire, the Black Country and the wider region, through responsible design and by taking into account community interests and environmental considerations.

2.2. The Proposed Development

- 2.2.1. The Proposed Development comprises:
- An intermodal freight terminal with direct connections to the WCML, capable of accommodating up to 10 trains per day and trains of up to 775m long, including container storage, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities;
 - Up to 743,200 square metres (gross internal area) of rail-served warehousing and ancillary service buildings;
 - New road infrastructure and works to the existing road infrastructure;
 - Demolition and alterations to existing structures and earthworks to create development plots and landscape zones;
 - Reconfiguring and burying of electricity pylons and cables; and
 - Strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas and publicly accessible open areas.
- 2.2.2. A plan showing the location of the Proposed Development can be found below:

Figure 1: Locational context plan



2.3. Purpose of this document

- 2.3.1. In accordance with section 37(3)(c) of the Act, this document comprises the Consultation Report and details all pre-application consultation for the Proposed Development.
- 2.3.2. This report provides a summary of non-statutory consultation undertaken as well as a detailed account of the statutory consultation carried out for the Proposed Development. This report also provides details of FAL's consideration of, and response to, the relevant issues and comments raised during statutory consultation, to demonstrate how FAL has complied with

its duties under section 49 of the Act to 'have regard' to response to consultation and publicity.

2.4. Report structure

2.4.1. This report is set out as follows:

2.4.2. Chapter 3 – Compliance with statutory requirements

Outlines how FAL has complied with statutory requirements and guidance when undertaking pre-application consultation on the Proposed Development.

2.4.3. Chapter 4 – Pre-consultation engagement

Details the pre-consultation engagement FAL undertook prior to commencing consultation on the Proposed Development.

2.4.4. Chapter 5 – Stage 1 Consultation (non-statutory)

Details how Stage 1 Consultation was carried out between 13 June 2016 and 24 July 2016 and how this influenced the evolution of the Proposed Development.

2.4.5. Chapter 6 – Stage 2 Consultation under section 42

Details how consultation under section 42 of the Act was undertaken with statutory consultees including Persons with Interest in the Land (PILs) and relevant local authorities as part of Stage 2 Consultation between 5 July 2017 and 30 August 2017.

2.4.6. Chapter 7 – Stage 2 Consultation: Statement of Community Consultation

Describes the process followed in developing, consulting on and publishing the Statement of Community Consultation (SoCC) for the Stage 2 Consultation.

2.4.7. Chapter 8 – Stage 2 Consultation under Section 47

Details how consultation under section 47 of the Act was undertaken with the community as part of Stage 2 Consultation between 5 July 2017 and 30 August 2017.

2.4.8. Chapter 9 – Stage 2 Consultation: Publicity under Section 48

Provides details of the publicity undertaken in respect of section 48 of the Act.

2.4.9. **Chapter 10 – Stage 2 Consultation: Responses received under Section 42**

Provides a summary of the representations received under section 42 of the Act and FAL's regard to these in the development of the Proposed Development.

2.4.10. **Chapter 11 – Stage 2 Consultation: Responses received under Section 47**

Provides a summary of the representations received under section 47 of the Act and FAL's regard to these in the development of the Proposed Development.

2.4.11. **Chapter 12 – Stage 2 Consultation: Responses received under Section 48**

Provides a summary of the representations received under section 48 of the Act and FAL's regard to these in the development of the Proposed Development.

2.4.12. **Chapter 13 – Stage 2a Consultation**

FAL undertook a focused consultation on amendments to the Proposed Development. This chapter details how that consultation was undertaken.

2.4.13. **Chapter 14 – Stage 2a Consultation responses**

Provides a summary of the representations received to the Stage 2a Consultation and FAL's regard to these in the development of the Proposed Development.

2.4.14. **Chapter 15 – Ongoing engagement**

FAL has continued to engage with consultees after the statutory consultation in order to ensure all issues raised as part of the statutory consultation have been considered properly. This chapter summaries this engagement.

2.4.15. **Chapter 16 – Conclusions**

Concludes on the effectiveness of the consultation, in raising awareness of the Proposed Development and securing feedback that has helped develop the application.

2.5. Summary of dates

2.5.1. The table below provides a summary of key dates relating to consultation on the Proposed Development.

Table 1: Key pre-application consultation dates

Consultation	Start date	End date
Pre-consultation engagement	12 April 2016	June 2016
Proposed Development website goes live	14 April 2016	N/a
Stage 1 Consultation (non-statutory) including three public exhibitions held between Thursday, 30 June and Saturday, 9 July 2016	13 June 2016	24 July 2016
Consultation (statutory) with local authorities on Draft Statement of Community Consultation	10 May 2017	14 June 2017
Statement of Community Consultation published on website	21 June 2017	N/a
S47 notice of Statement of Community Consultation published in three regional papers: Birmingham Mail, Express and Star and the Staffordshire Newsletter	21 June 2017	N/a
Notification of the Secretary of State under section 46	3 July 2017	N/a
Issue of information to consultees under section 42	4 July 2017	N/a
Stage 2 Consultation (statutory)	5 July 2017	30 August 2017
First notice (in local and national newspapers) publicising the proposals under section 48	5 July 2017	N/a
Second notice (in local newspapers) publicising the proposals under section 48	12 July 2017	N/a
Deadline for the receipt of responses to Stage 2 Consultation under sections 42, 47 and 48	N/a	30 August 2017
Stage 2a Consultation	23 November 2017	2 January 2018

3. Compliance with statutory requirements

- 3.1.1. All pre-application consultation has conformed to the relevant statutory requirements, as set out in the Act and relevant guidance. Guidance includes both the Planning Inspectorate's 'Advice Note 14' (Version 2, April 2012) and the Department for Communities and Local Government's (DCLG) 'Planning Act 2008: Guidance on the pre-application process' (March 2015). Tables setting out a summary of compliance with the various statutory requirements are contained within Appendix A, with reference to the detail contained in the relevant chapters in this Report.
- 3.1.2. In addition, the Stage 2 Consultation with the community was carried out in accordance with the activities set out in the published Statement of Community Consultation (SoCC), a copy of which can be found at Appendix K.
- 3.1.3. More details of how the activities carried out comply with the SoCC can be found in the SoCC Adherence Table contained in Appendix M.

4. Pre-consultation engagement

4.1. Introduction

- 4.1.1. This chapter provides information on the pre-consultation engagement following the launch of the Proposed Development. The early development of the Proposed Development is outlined in Chapter 3 of the Planning Statement (**Document 7.1A**). This includes details of engagement with a number of organisations on Strategic Rail Freight Interchange (SRFI) site searches and feasibility work in the period prior to the public launch of the Proposed Development in April 2016.
- 4.1.2. Prior to undertaking consultation on the Proposed Development, Four Ashes Limited (FAL) has engaged with residents and businesses nearest to the Site. The purpose of this early engagement was to introduce the people closest to the Proposed Development to the principle of an SRFI, to FAL and to the process that the Proposed Development would be following.

4.2. Homes and businesses in the vicinity of the Site

- 4.2.1. On 12 April 2016, FAL sent letters to 234 homes and businesses near to the Site with introductory information about the Proposed Development. Those closest to, or within, the proposed Site were offered meetings with Peter Frost, FAL director. Several meetings were held with members of the local community before the start of the Stage 1 Consultation. These were one-to-one meetings to explain the principle of the application and the Development Consent Order (DCO) process.

4.3. Presentations to local authorities

- 4.3.1. On 12 April 2016, FAL gave a presentation to South Staffordshire District Councillors and a number of Staffordshire County Councillors to explain the principles of the application, our consultation approach and the DCO process. Members asked the team to keep them informed via regular briefings at key points in the development of the Proposed Development. A further presentation was made on 7 June 2016 to brief members ahead of the Stage 1 Consultation.

4.4. Other engagement

- 4.4.1. In addition, elected representatives (including councillors, parish councils and Members of Parliament) were sent information about the Proposed Development on 12 April 2016.
-

4.5. Conclusion

- 4.5.1. This pre-consultation engagement helped to prepare local people, businesses and authorities for the forthcoming consultation process.

5. Stage 1 Consultation

5.1. Introduction

- 5.1.1. Applicants applying for development consent under the Act are required to carry out pre-application consultation that fulfils certain requirements before they can be accepted for examination by the Secretary of State. In addition to consulting various statutory bodies and people whose land may be affected, the Act sets out how the community should be consulted.
- 5.1.2. Four Ashes Limited (FAL) has carried out two stages of consultation on the Proposed Development. A further targeted consultation was also undertaken. The first stage of consultation was carried while the Proposed Development was at an early stage in its development (Stage 1).
- 5.1.3. The Stage 1 Consultation was a 'non-statutory' consultation, in that it was not formally subject to the statutory consultation requirements. However, FAL took the decision to undertake a consultation that was not materially different to a statutory consultation in scope (reach) and content, whereby FAL consulted those required to be consulted in statutory consultation, published newspaper advertisements, held public exhibitions, established Information Points and erected a number of site notices around the Site where it had been ascertained there were interests in the Site but the beneficiary of such interests was unknown. This consultation was carried out between 13 June 2016 and 24 July 2016.

5.2. Stage 1 Consultation Strategy

- 5.2.1. As part of the Stage 1 Consultation, FAL produced a Consultation Strategy outlining the purpose of the consultation and how people could get involved. A copy of this document can be found at Appendix B.
- 5.2.2. South Staffordshire District Council and Staffordshire County Council advised on the content of the Consultation Strategy for the Stage 1 Consultation and provided comments in advance of it being published on the West Midlands Interchange (WMI) website (www.westmidlandsinterchange.co.uk) on 8 June 2016 ahead of consultation starting on 13 June 2016.
- 5.2.3. In addition, South Staffordshire District Council and Staffordshire County Council Cabinet and Councillors received a presentation

and briefing on 7 June 2016 advising of the Consultation Strategy publication and forthcoming consultation activities. Gavin Williamson MP for South Staffordshire and Jeremy Lefroy MP for Stafford had a face-to-face briefing on the Proposed Development on 31 May 2016 and were emailed Proposed Development information on 13 June 2016 which included the Consultation Strategy and consultation documents.

5.2.4. Two options for laying out the various elements of the Proposed Development were the focus of Stage 1 Consultation, in particular the location of the rail terminal and the associated road and rail infrastructure. Illustrative Masterplans showing separate East and West options for the Site were provided and can be found in Appendix B. Feedback was invited on both options though it was made clear these were illustrative as many elements of the proposals could change. Other questions were also asked to gather information about the local area and what people might like to see as part of the next stage of consultation.

5.2.5. The following sections detail how the consultation was undertaken in accordance with this strategy, the feedback received, and FAL's consideration of this feedback in the evolution of the Proposed Development.

5.3. Stage 1 Consultation materials

5.3.1. During Stage 1 Consultation, the following materials were made available as part of the consultation:

- Newsletter – which summarised the Proposed Development and the Stage 1 Consultation process, as well as directed people to where more information could be found and details of public exhibitions.
- Illustrative Masterplan Options – plans showed the two layout options for the Proposed Development that were consulted on.
- Overview Document – this was the primary consultation document for Stage 1. It contained:
 - Background to the Proposed Development
 - Preliminary proposals
 - Information about potential benefits, effects and impacts of the proposals.

- Environmental Report – a technical document that set out early environmental considerations and information about the proposals.
 - Transport Technical Note – a technical document that set out early transport considerations and preliminary proposals.
 - Feedback Form – to help collect people’s views during the consultation process. The form guided feedback on a number of issues which FAL was specifically interested in at this stage of the Proposed Development’s development, but there was also dedicated space to make any additional comments.
- 5.3.2. Copies of the consultation materials can be found in Appendix B, with the exception of the Environment Report and the Transport Technical Note that have not been included owing to their length. All documents were available to download via the WMI website (www.westmidlandsinterchange.co.uk), to view at Information Points and at the public exhibitions.

5.4. Consultation with statutory bodies

- 5.4.1. Although the Stage 1 Consultation was not formally subject to statutory consultation requirements, FAL was keen to ensure that the consultation was comprehensive and the scope (reach) and content of the consultation was not materially different to a statutory consultation as described in 5.1.3.
- 5.4.2. A list of those consulted is contained in Appendix B. The deadline for responding to the Stage 1 Consultation was the same as for members of the public: 24 July 2016, however, late feedback was also accepted.
- 5.4.3. The Stage 1 Consultation letter included details of the WMI website where all the consultation documents could be downloaded, details of the project email address, the Freepost address and dedicated helpline number, as well as the following enclosures:
- A Newsletter that was also sent to homes and businesses near the Site within the Consultation Zone, setting out information about the Proposed Development and consultation.
 - Plans of the two Illustrative Masterplan options for the rail terminal being consulted on.
 - A Feedback Form asking specific questions about the Proposed Development.

5.4.4. Copies of these enclosures can be found in Appendix B.

5.5. Consultation – Persons with an Interest in the Land

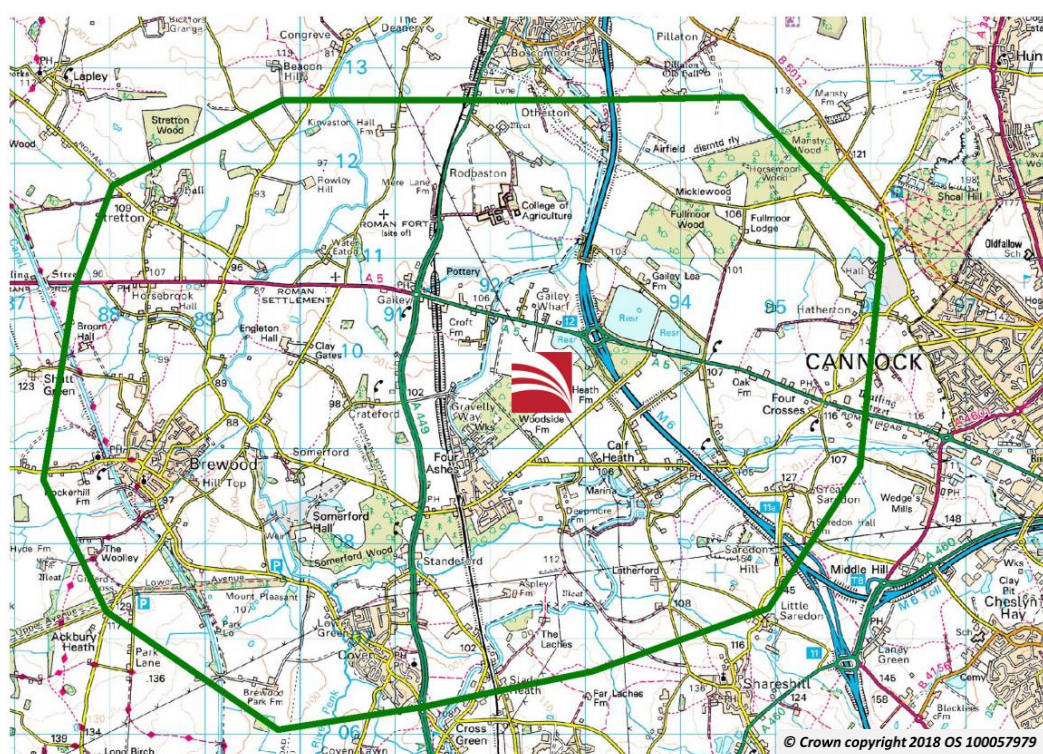
5.5.1. Through land referencing FAL identified Persons with an Interest in the Land (PILs) potentially affected by the Proposed Development. Those identified PILs were sent a letter inviting them to take part in the consultation. A copy of the letter sent to PILs can be found at Appendix B. The list of PILs has not been included owing to data protection.

5.5.2. FAL also erected a number of site notices around the Site where it had been ascertained that there were interests in the Site where the beneficiary of such interests was unknown. A plan showing the location of these notices and a copy of the notices can be found in Appendix B.

5.6. Consultation with the local community

5.6.1. A copy of the Consultation Zone, which was agreed with South Staffordshire District Council as part of discussions with them on the Consultation Strategy, can be found below:

Figure 2: Stage 1 Consultation - Consultation Zone



5.6.2. The consultation zone extended approximately 2km from the indicative site boundary, with small extensions to ensure villages or groups of houses were wholly included. The extent was

designed to capture people who live and work in the vicinity of the Proposed Development.

- 5.6.3. As set out in the Consultation Strategy, a number of methods were used to facilitate people's engagement with the consultation. These are explained below.

Direct mail

- 5.6.4. All homes and businesses within the Consultation Zone identified in the Consultation Strategy were sent information directly by Royal Mail. This provided a reliable way of ensuring that people who lived and worked within the Consultation Zone had an opportunity to learn about the Proposed Development and consultation. Homes and businesses were sent copies of the Newsletter, Feedback Form and Illustrative Masterplan Option plans.

- 5.6.5. Direct contact with elected representatives was also made, recognising their influence in communicating messages to involve communities, along with a list of other influential stakeholders. A full list of those contacted can be found in Appendix B.

Newspaper advertisements

- 5.6.6. In order to promote awareness of the Proposed Development and consultation amongst the Consultation Zone and wider area, newspaper advertisements were placed in the Birmingham Mail and the Express and Star on Thursday 16 June 2016, during the first week of the consultation. Copies of those advertisements can be found in Appendix B.

Press release

- 5.6.7. In order to promote awareness of the Proposed Development and consultation amongst the wider community, a press release was issued on Monday 13 June 2016 to the following newspapers and media outlets:

- Birmingham Mail
- Birmingham Post
- Bridgnorth Journal
- Burton Mail
- Cannock Chronicle
- Coventry Telegraph
- Express & Star
- Leek Post & Times
- Lichfield Mercury
- Royal Sutton Coldfield Observer
- Shrewsbury Admag
- Shrewsbury Chronicle

- Shropshire Star
- Staffordshire Newsletter
- Sunday Mercury
- Tamworth Herald
- Telford Journal
- The Sentinel (Stoke)
- Walsall Advertiser
- Walsall Chronicle
- Wolverhampton Chronicle
- Wolverhampton West, Town and Village Life

5.6.8. A copy of the issued press release can be found in Appendix B.

Posters

5.6.9. These were available on request to any business, Parish Council or other interested body as their ability to motivate public involvement in the consultation process was recognised. A copy of the poster can be found in Appendix B.

5.6.10. In order to help further promote the consultation, the posters were placed in the following locations:

Table 2: Stage 1 Consultation poster locations

Poster location	Postcode
Shareshill Community Shop and Post Office	WV10 7LA
Shareshill, St Mary & St Luke C Of E Church	WV10 7LA
Shareshill Parish Council notice board next to Havergal C E Primary School	WV10 7LE
Shareshill Parish Council notice board next to Shareshill Community Shop and Post Office	WV10 7LA
Calf Heath Village Hall	WV10 7DW
Cheeky Munchies	WV10 7DE
The Co-operative Food Penkridge	ST19 5DH
Penkridge Parish Council	ST19 5DT
The Mess Bistro	ST19 9BS
The Co-operative Food Brewood	ST19 9BS
Brewood and Coven Parish Council	ST19 9DX
Public notice board next to Lloyds Pharmacy	ST19 9BS
Lazy Days Café and Tearoom	ST19 9DX
The Village Bakery	ST19 9DX
Dobbies Garden Centre	ST19 5PP
South Staffordshire College	ST19 5PH
Coven Bakery	WV9 5BX
Coven Post Office	ST19 9BS
Coven Co-Op	WV9 5BX
Cheslyn Hay Leisure Centre	WS6 7JQ

Cheslyn Hay Library	WS6 7HP
Cheslyn Hay Parish Council	WS6 7HP
Featherstone & Hilton Community Centre Association	WV10 7TR
Featherstone Post Office	WV10 7AA

Information availability

5.6.11. All the Stage 1 Consultation documents were available to download online from the WMI website. As agreed as part of the Consultation Strategy, paper copies were available to view at public exhibitions and at identified Information Points at Brewood Library, Penkridge Library and South Staffordshire District Council (see Table 3 below) for the duration of the consultation. The details of the website, public exhibitions, Information Points, email and Freepost address and dedicated helpline were provided in the published Consultation Strategy and the Newsletter, the latter being distributed to homes and businesses in the Consultation Zone and other stakeholders, as well as being available to take away at Information Points and public exhibitions. A covering letter to the information point venues also contained information about where and how to access information and was accompanied by a Newsletter.

Table 3: Stage 1 Consultation - Information Point locations

Location	Address
Brewood Library	Newport Street, Brewood, Stafford, ST19 9DT
Penkridge Library	Bellbrook, Stafford, ST19 5DL
South Staffordshire District Council	Wolverhampton Road, Codsall, WV8 1PX

5.6.12. The Newsletter, Feedback Forms and the Overview Document, which summarised the key information at this stage of the Proposed Development, were available for people to take away from Information Points, at public exhibitions and on request via a dedicated helpline number or via the dedicated email or Freepost address.

5.6.13. This approach ensured that people could review documents in the way that best suited them.

Public exhibitions

5.6.14. Three public exhibitions were held as set out in the published Consultation Strategy. The exhibitions provided an opportunity for

people to review the documents with members of FAL’s technical team on hand to answer questions. The exhibitions were held early in the consultation period to allow people to discuss issues with them and have time to fully consider their responses to the consultation.

5.6.15. A total of 472 attendees were recorded at the three public exhibitions.

Table 4: Stage 1 Consultation public exhibition details

Date	Time	Location	Attendees
Thursday, 30 June 2016	2pm to 7pm	The Haling Dene Centre, Cannock Road, Penkridge, Stafford, ST19 5DT	183
Friday, 8 July 2016	3pm to 8pm	Coven Memorial Hall, Brewood Road, Coven, WV9 5DL	144
Saturday, 9 July 2016	10am to 2pm	Calf Heath Village Hall, Straight Mile, Calf Heath, Wolverhampton, WV10 7DW	145
Total			472

Feedback mechanisms

5.6.16. A number of different ways for people to provide their comments were provided. The Stage 1 Feedback Form was included with the Newsletter that was sent to homes and businesses in the Consultation Zone. This included a Freepost address so that responses could be sent without cost to the community.

Feedback could be sent through any of the channels below. The deadline for responding was midnight on Sunday 24 July 2016, although late responses were accepted.

Feedback could be sent by:

- Leaving completed Feedback Forms at a public exhibition;
- Freepost – FREEPOST WMI;
- Website (www.westmidlandsinterchange.co.uk) which hosted an online version of the Feedback Form; or
- Email – via contactus@communityrelations.co.uk.

5.7. Responses from statutory bodies as part of Stage 1

5.7.1. Responses to the Stage 1 Consultation were received from 20 statutory bodies:

- Cannock Chase Area of Outstanding Natural Beauty Partnership (AONB)
- Cheslyn Hay Parish Council
- Dunston with Coppenhall Parish Council
- Environment Agency
- ES Pipelines
- Health and Safety Executive
- Highways England
- Inland Waterways Association
- Joint Parish Councils – comprising:
 - Hatherton Parish Council
 - Featherstone Parish Council
 - Cheslyn Hay Parish Council*
 - Great Wyrley Parish Council
 - Shareshill Parish Council
 - Saredon Parish Council
 - Hilton Parish Council
 - Huntington Parish Council
 - Dunston with Coppenhall Parish Council*
- Lapley, Stretton and Wheaton Ashton Parish Council
- National Grid
- Natural England
- Penkridge Parish Council
- Public Health England
- Royal Mail Group
- South Staffordshire District Council
- Staffordshire County Council
- Staffordshire Fire and Rescue
- The Coal Authority
- Warwickshire County Council

5.7.2. Those parish councils indicated with an * also submitted individual responses as well as being part of the joint parish council response.

5.7.3. A summary of the feedback from the bodies can be found below:

Cheslyn Hay Parish Council

5.7.4. Cheslyn Hay Parish Council raised several objections to the proposals on the grounds of the loss of Green Belt, impact on local residents (specifically noise), the impact on rural amenity, the traffic created by the Proposed Development and the potential for “rat running” through local communities. Concern was also expressed about the location and scale of the Proposed Development. The Parish Council also considered that mineral excavation on the Site should be completed before any development is taken forward.

5.7.5. The Parish Council asked several questions about the Proposed Development, including: whether the Proposed Development was part of a national initiative; whether it was linked to Pentalver; if the Proposed Development would lead to the nationalisation of the M6 toll; the interaction with the proposed M54/M6 link road and HS2; if there was additional capacity on the rail line; if occupants would be required to use the rail terminal; how staff car parking was being handled; the area employees were likely to be drawn from; what pollution controls could be put in place, and how traffic controls could be enforced.

Dunston with Coppenhall Parish Council

5.7.6. Dunston with Coppenhall Parish Council raised objections to the Proposed Development on the grounds of the impact on residents and the loss of Green Belt. Concerns were also expressed regarding the impact of additional traffic, noise and pollution. It was also stated that the Proposed Development should not only benefit FAL.

5.7.7. The Parish Council asked several questions about the Proposed Development, including: a request for details of the transfer from road to rail; details of the freight transportation to be used; whether Jaguar Land Rover (JLR) will be affected by the Proposed Development; which rail routes would be used, and the need for the Proposed Development.

Lapley, Stretton & Wheaton Aston Parish Council

5.7.8. Lapley, Stretton & Wheaton Aston Parish Council raised concerns about the proposals, including: the impact of air and noise pollution from Heavy Goods Vehicles (HGV) traffic, and the impact on already congested major roads. The Parish Council suggested

that a non-Green Belt Strategic Rail Freight Interchange (SRFI) site be used.

Penkridge Parish Council

- 5.7.9. Penkridge Parish Council did not provide its own response but collated and forwarded correspondence from local residents as its response. The issues raised included: objection to the loss of Green Belt; concern about the scale of the Proposed Development; statements that there are other brownfield Sites that should be used; that claims have not been backed up; concern regarding traffic generation and the impact on residents; the loss of natural habitats; the impact on rural lifestyle; impact on property prices, and the justification for developing south of Vicarage Road.
- 5.7.10. Some of the emails expressed general opposition to the Proposed Development. The issue of whether occupants would be obliged to use the rail terminal was also raised.

Joint Parish Council response

- 5.7.11. A consultation response was received as a joint response from nine parish councils. These were:
- Hatherton Parish Council
 - Featherstone Parish Council
 - Cheslyn Hay Parish Council
 - Great Wyrley Parish Council
 - Shareshill Parish Council
 - Saredon Parish Council
 - Hilton Parish Council
 - Huntington Parish Council
 - Dunston With Coppenhall Parish Council
- 5.7.12. The issues raised in the response were:
- Opposition to the development, primarily because of the loss of Green Belt;
 - Lack of evidence that there are no appropriate alternative SRFI sites;

- Alternative SRFI sites were suggested including Rugeley Power Station, Junction 15 at Meaford, Hortonwood at Telford, Fradley at Lichfield and Drakelow Power Station;
- Concern that occupants will not be obliged to use the rail terminal and that it will simply become a logistics centre;
- Concern regarding additional traffic and the impact on people and roads;
- Concern regarding noise and light pollution;
- Concern regarding impact on a Site of Special Scientific Interest (SSSI);
- The jobs figures were questioned and concerns were raised about the impact on the local economy and public finances;
- Concern regarding the loss of a heritage asset provided by the Canal Conservation Area, and
- Statement that there was no evidence for the size of the Proposed Development, and the use of land south of Vicarage Road was questioned.

Cannock Chase AONB Partnership

- 5.7.13. Cannock Chase AONB Partnership's primary concerns related to visual impact on the Cannock Chase Area of Outstanding Natural Beauty (AONB) and what mitigation measures would be taken to screen the Site.

Environment Agency

- 5.7.14. The Environment Agency raised several specific areas for consideration by FAL, including: contamination of controlled waters from the terminal area; impact on existing ground water remediation work; localised surface water flooding; management of contaminated water and drainage.
- 5.7.15. General concerns about air pollution were also raised. The Environment Agency suggested that the West layout option would have less impact on watercourses.

ES Pipelines

- 5.7.16. The utilities firm ES Pipelines confirmed that it had no gas or electricity infrastructure on the Site and was not affected.

Health and Safety Executive

5.7.17. The Health and Safety Executive responded that it had no comments on the Proposed Development at this stage, but that it should be involved in the statutory consultation.

Highways England

5.7.18. Highways England requested that several matters be considered and information is provided about of the Proposed Development, including:

- Statement that joint working with Network Rail will be required;
- That Highways England will need to see rail forecasts;
- Suggestion of 24/7 surveys for HGV, non-HGV and rail trips;
- Various points regarding additional or expanded surveys and information for the next stage of consultation;
- Request for evidence demonstrating appropriateness of proposed junction layout;
- Request for more detail regarding provision for sustainable modes of transport;
- Statement that the consented Bericote development needs to be considered;
- Agreement that the facility represents an 'exceptional circumstance';
- Confirmation of the intention to assess future year assessment in 2036; and
- Its impact on air quality, ecology and nature conservation, landscape and visual, noise and vibration, water environment and utilities.

Inland Waterways Association

5.7.19. The Inland Waterways Association raised general concerns about the Proposed Development, including: a stated reduction in freight capacity on the West Coast Mainline; excessive size of Proposed Development; that the Proposed Development is not a 'rail interchange', and that transportation claims are not credible.

5.7.20. Specific concerns regarding the impact on the Staffordshire and Worcestershire Canal included: damage to the rural setting of the Canal; the visual impact of the development and proximity to the

Canal; noise impact, and potential impact on Calf Heath Reservoir.

National Grid

- 5.7.21. National Grid responded to the consultation to alert the team to low and medium pressure pipelines in the development area.

Natural England

- 5.7.22. Natural England noted that the Proposed Development is near the Cannock Chase AONB, Four Ashes Pit SSSI and Belvide Reservoir SSSI. Natural England highlighted the potential impact of air pollution, the loss of agricultural land and the need to accommodate protected species. An evidence plan which should look to demonstrate a net benefit was requested.

Public Health England

- 5.7.23. Public Health England made a number of requests and recommendations for information, including: assessment of alternative SRFI sites; recommendation of carrying out an Environmental Impact Assessment; screening assessments; air pollution assessment; water impact assessment; contamination assessment; consultation with local authorities and the Environment Agency, and assessment for human health risk.
- 5.7.24. It was also suggested that the perception of risk may have a greater impact than hazards themselves.

Royal Mail Group

- 5.7.25. The Royal Mail Group confirmed that they have no issue with the Proposed Development going ahead but expressed concern regarding the potential impact of additional traffic. The Royal Mail Group requested a detailed transport impact assessment and to be involved in the next stage of consultation.

South Staffordshire District Council

- 5.7.26. South Staffordshire District Council responded to the consultation with an interim position on the Proposed Development, which was to oppose the Proposed Development at the Site due to the impact on the Green Belt but acknowledged that the Proposed Development addresses the Government's aim of shifting freight from road to rail. The Council requested an assessment of alternative SRFI sites.

Staffordshire County Council

- 5.7.27. Staffordshire County Council requested evidence of the need for the Proposed Development, the Site selection and the exceptional circumstances warranting the large scale of the development, and how the Proposed Development fits with national strategy. The Council expressed interest in the transport aspects of the proposals, the justification for the loss of Green Belt, more detail on the proposed junctions, the integration of the rail element to the proposals and the potential to incorporate advanced manufacturing and engineering.
- 5.7.28. The Council expressed interest in the economic strategy for the Proposed Development, the travel to work area, the number and type of potential jobs created, how the freight paths would be managed, the creation of a training / employment plan for local people, and the potential for manufacturing on the Site.
- 5.7.29. The Council raised concerns including: the loss of Calf Heath Wood; impact on the water environment; indirect impact; flood risk; the need to assess impact on the historic environment; waste generation; air quality impact; impact on users of the Canal towpath; the need for information about phasing; the potential impact on passenger rail services; how the rail terminal will be linked in the rail line; the impact on traffic; parking provision, and impact on existing businesses (specifically during construction).
- 5.7.30. The Council requested: that community facilities be incorporated into the Site; that additional information about landscaping be provided; that sensitive building design be used and that the Proposed Development strive for sustainability; that flood risk and biodiversity be considered in the design; that additional surveys on biodiversity and flooding be carried out; and that the Water Framework Directive be considered when assessing impact.

Staffordshire Fire and Rescue

- 5.7.31. Staffordshire Fire and Rescue stated that appropriate supplies of water should be made available at the Site and proper vehicle access provided (including outlining requirements). The use of Automatic Water Suppressions Systems was advised.

The Coal Authority

- 5.7.32. The Coal Authority stated it had no comment as the Site lies outside its defined 'High Risk' areas.

Warwickshire County Council

- 5.7.33. Warwickshire County Council recognised the benefits the Proposed Development could deliver in better connecting local markets to ports and rail networks. The Council noted development pressure on the A5, the rail capacity on the branch line and that the consented Bericote scheme should be considered.

City of Wolverhampton Council

- 5.7.34. The City of Wolverhampton Council welcomed the proposals and recognised the need for a development of this type and scale in this area.

5.8. Feedback from the public

- 5.8.1. In all, 272 pieces of feedback were received via email, hard copy feedback form, online feedback form, or by post from members of the public, organisations and councillors.

- 5.8.2. This section of the report summarises the key matters raised in responses to Stage 1 public consultation. The analysis finds that traffic and noise are the most pressing issues, followed by justifications for developing the Green Belt, and then wildlife conservation. A number of requests for further information were also made in the consultation feedback.

- 5.8.3. A summary of the issues can be found below:

General proposal

- 5.8.4. General opposition / objection to the Proposed Development was frequently raised. Concerns appeared to relate to the sacrifice of Green Belt land, the perceived inappropriate nature of the development in the area and the scale of development.

- 5.8.5. There was a considerable amount of concern for the 24/7 operation of the Proposed Development. Particular concern was expressed towards light and noise pollution as well as the impact of this on local residential properties.

- 5.8.6. Many respondents rejected both Masterplan options owing to the disruption expected to country lifestyle, the size of the Proposed Development and expected congestion issues (particularly along the A449).

- 5.8.7. There was significant support for the idea that the Proposed Development should not be 'allowed to happen/should not

happen/hope it does not happen'. Opposition to using Green Belt land was focused on challenging government policy and the belief that there is a lack of 'special circumstances' justifying the Proposed Development's location.

- 5.8.8. There was scepticism as to whether all WMI operators would use the rail/freight network/whether WMI would be open to companies not using the rail terminal. There was concern that the rail element is being used only to justify the rest of the Proposed Development. People believed this was being used to override government policy on Green Belt land and the fact that WMI would generate further road traffic would detract from the proposed benefits of WMI.
- 5.8.9. Many people expressed the view that money is the only benefit of the Proposed Development, as well as a belief that the Site choice has been based on cost. This point stimulated various comments referring to the primary landowner.
- 5.8.10. There was also the suggestion that WMI should not be built/developed. Those suggesting this believed there was no evidence of the need for the Proposed Development, as well as concern for the impact of it.
- 5.8.11. Many people made enquiries about the operational hours of WMI, including concern for the disruption of night time deliveries. There were various requests for FAL to commit to no night time working.
- 5.8.12. Requests were made to confirm the type of operations (particularly regarding manufacturing), due to concern for the impact of different types of manufacturing and the belief that some proposals do not fit the intended purpose of an SRFI.

Need case and alternatives

- 5.8.13. The most frequently raised theme in this category was the suggestion that the SRFI should be sited on brownfield land/previously developed/derelict land, as well as various suggestions of alternative SRFI site locations. Suggestions included Dunston, Birmingham and Rugeley. Many people requested the justification behind not choosing a brownfield SRFI site.
- 5.8.14. There were various general statements about alternative options. Comments included suggestions of other SRFI sites; Wolverhampton, Wednesfield and Willenhall (which were believed

to have good transport links, brownfield land). Other suggestions included other areas of the M6.

- 5.8.15. It was also suggested that the Proposed Development is moved elsewhere. The most frequent comments here included the suggestion that it is sited in an existing industrial area or in a location where it is less visible.
- 5.8.16. Rugeley power station was suggested as a location. Justifications included the strong transport links and that the area is looking for development opportunities allowing regeneration. A suggestion was also made to use Etwell and East Midlands SRFI Castle Donington as the location.
- 5.8.17. There was a suggestion that the underused Donnington Telford site be used. Several people believed extending the existing underused site would provide a good opportunity.

The Site and its location

- 5.8.18. A frequent concern was that the Site is on land that should be protected. People struggled to understand how this was allowed, as well as expressing concern for future generations in losing such Green Belt land.
- 5.8.19. There was the specific concern that the Proposed Development would stimulate urban sprawl/over industrialisation/future extensions/development beyond the Site. Many comments expressed the view that the Black Country was already overdeveloped, as well as fears that the village would merge into the Site.
- 5.8.20. Concerns about the Site outweighed support. Direct opposition to its choice was felt, with comments encouraging the use of brownfield land where the traffic and infrastructure is more suitable.
- 5.8.21. There were also comments drawing attention to the fact that the Proposed Development is in a woodland/conservation area. People commented specifically on the loss of Calf Heath Wood and the impact of this on wildlife habitats.
- 5.8.22. People were concerned for the mineral reserves on the Site, with many people stating that the Proposed Development should not occur before the reserves are fully extracted.

Green Belt

- 5.8.23. One of the most commonly raised issues from feedback was the statement that the Site is in the Green Belt (implication is that there should be no development on the Site). People supported their statement with descriptions of what they believe is the purpose of Green Belt, such as safeguarding the countryside and preventing urban sprawl.
- 5.8.24. There was considerable opposition to the loss of Green Belt; the need to retain Green Belt land for future generations and the belief that the Proposed Development does not justify special circumstances to overrule Green Belt legislation.

Scale

- 5.8.25. The most frequently raised issue in terms of the scale of the Proposed Development was the belief that the Site should not cross Vicarage Road. People could not understand the logic behind the extension, and there was also concern regarding creating traffic issues in a greater area.
- 5.8.26. It was suggested that the Site be reduced in scale/scope. There was a shared belief that the Site is bigger than necessary. There were several requests for specific units to be removed.

Masterplan options

- 5.8.27. Many people expressed the view that both Masterplan options have equally serious impacts. This was usually followed by an explanation of the impacts of each Option, including the destruction of residential areas, traffic on routes that cannot cope and Canal disruption.
- 5.8.28. There was support for the East Option; this was said to be justified due to the belief that it is a more efficient location (transport), as well as being further from residential areas.
- 5.8.29. Opposition was also expressed towards the East Option, with people believing it would destroy the Canal and expressing concern over the proximity to and impact on Calf Heath.
- 5.8.30. There were also comments expressing opposition to the West Option due to the proximity to residents. People also believed the West Option was illogical, requiring more internal movements than the East Option.

Mitigation

- 5.8.31. There was a belief that mitigation will not work. There was particular concern regarding cranes, with scepticism of the proposition that banking would hide their height. There were also references to a lack of noise screening, even if the Proposed Development was visually hidden.
- 5.8.32. In addition to this, many people expressed expectations or had enquiries regarding mitigation methods.

Transport issues

- 5.8.33. The most common issue raised relating to transport was a concern regarding congestion and traffic flow, in general. Specific areas of concern were the additional 8,000 cars on the road impacting on journey times, encouraging the use of rat runs and damaging roads.
- 5.8.34. A substantial number of people expressed concern about congestion on the A449. This was of particular concern, as it is perceived that the road already suffers from blockages when issues on the M6 arise. People were particularly concerned for the potential time delay for reaching the hospital in Wolverhampton.
- 5.8.35. There were also comments expressing concern over the poor suitability of the roads, or requesting improvements to the road network. People expressed particular concern for Penkridge's narrow roads coming under increased pressure, the lack of footpaths, and the low rail bridge in Four Ashes.
- 5.8.36. People commented that they had concern for congestion generally and locally. There were complaints that there are already issues of congestion which will be made worse by thousands of commuters. There was particular concern for the impact on areas such as Penkridge, Gailey, Coven, Calf Heath and Brewood.
- 5.8.37. There were critical comments about the impact of an increased number of commuters in the area, particularly due to the strain they will place on local roads, potentially encouraging rat runs. People were also concerned for the impact on local services, which many claimed are already overworked.
- 5.8.38. There was concern about congestion on the A5, particularly as it is believed that problems already occur regularly when there are problems on the M54, and there were several references to gridlock issues at J12.

- 5.8.39. Concern was also expressed about congestion on the M6. People complained about the impact of this on their commute, as well as the knock-on impact of traffic in this area on the A449 and other back roads.
- 5.8.40. There was a specific concern for the increase in the number of HGVs. People were alarmed by the statistic of 5,000 lorries being in the area, fearing the potential impacts relating to air pollution and noise levels.
- 5.8.41. There were numerous road traffic generation enquiries raised in feedback. Themes included: predictions of amount of traffic generated; requests for traffic flow management plans, and whether independent traffic studies have been carried out.
- 5.8.42. People commented that they were concerned for the vibration from additional road/rail traffic. People expressed particular concern for the potential impact on a listed building by the A5, whilst suggesting measures such as sunken rails to reduce this impact.
- 5.8.43. People expressed concern about staff access to the Site from Vicarage Road. They believed this would encourage a rat run situation on Straight Mile/Stable Lane/Woodlands Lane. Many believe that access through the A5 should be adequate enough.
- 5.8.44. Concerns were raised regarding train deliveries. Various questions were asked regarding the running, size and type of trains.
- 5.8.45. There was also general concern for additional train/rail journeys, particularly if 24/7 operation was in effect, and the impact of this on house values.
- 5.8.46. People made many comments expressing concern about road safety. People expressed particular concern for cyclists/horse riders/walkers/children/the elderly being exposed to additional traffic, particularly in areas like Light Ash cul de sac, the A449 and M6 Junction 12.
- 5.8.47. There was a specific safety concern regarding the impact of additional traffic on congestion, and subsequently the impact on emergency services response times.

General impacts

- 5.8.48. The most common concern raised was regarding air pollution, arising from an increase in the number of vehicles in the area. People expressed concern about the implications of this for

people's health (particularly for people with existing health conditions).

- 5.8.49. A frequently raised concern was regarding Calf Heath Reservoir, and the potential implications for access as well as the heronry at Gailey and Calf Heath.
- 5.8.50. A substantial number of people expressed concern about pollution in general. People were concerned about the impact of pollution on their health (particularly in areas like Calf Heath where many people commented there is a high cancer rate), as well as about its impact on animals and children.
- 5.8.51. There was specific concern for the general impact that WMI would have in disrupting the environment. People were keen for developers to be fully aware of the environmental impact, with requests for clarification regarding whether an independent development impact study had been produced (and by whom), as well as requests for 3D Building Information Modelling and environmental reports of each SRFI site considered.
- 5.8.52. People were concerned for the water table/flood risk. There was a public consensus for the naturally high water table of the area to be considered, while concern was expressed over the loss of permeable surfaces and natural flood defences. Specific areas referred to include: Stable Lane, Calf Heath Lane, Station Drive, Vicarage Road and Woodlands Lane.

Residential amenity and rural character

- 5.8.53. Critical comments outweighed positive comments in relation to residential amenity and rural character. The most frequently raised issue was concern for the loss of the area's rural character and quality of life, with a public desire to maintain the area's rural character. People described their semi-rural lifestyle (dog walking/horse riding, etc.) and expressed concern over the impact of the Proposed Development on a tranquil, rural area.
- 5.8.54. There was concern over the impact on local villages and residential amenity. There was specific concern regarding the impact on local services (particularly medical and schools), as well as that the area will be seen as a 'commuter village', disturbing residents, businesses and lifestyles. People were concerned about the noise of the development (and inevitable traffic caused), and the eventual operation of WMI was frequently mentioned.

- 5.8.55. Concerns were raised that residents have already been subject to development and its subsequent negative impacts. People made specific reference to the recently developed i54, JLR factory, Veolia Incinerator, failing M6 toll road, Daventry Plant and Donnington Telford rail freight terminal, amongst others. Subsequent negative impacts included visual, traffic, pollution and environmental impacts.
- 5.8.56. The view that villages and houses would be blighted was expressed. Many believed the human price was too high, raising concerns that Gailey would be 'obliterated' and that the development would 'kill Penkridge'. References were also made to Calf Heath and the impact of traffic, congestion and noise.
- 5.8.57. People expressed concern that their countryside is being ruined/disturbed, emphasising that it is their area.
- 5.8.58. Complaints were made that lifestyles and homes are being taken away from them. Multiple comments were made towards social class, and the view that people were being taken advantage of was expressed. People complained that they had paid a premium for a rural lifestyle and that they did not want to have to move to find this again.

Noise

- 5.8.59. The most common issue raised here was concern over general noise pollution. Specifically, people were concerned for the potential of 24-hour noise disturbance in a currently quiet area. There was concern regarding the impact on homes in Gailey/Calf Heath/Straight Mile/Station Road. There were several requests for noise monitoring and consultation.
- 5.8.60. There was specific concern for noise pollution produced by traffic. Many people highlighted that noise from traffic in the area is already an issue, particularly from the M6 in Penkridge, Calf Heath and Dunston.
- 5.8.61. There were also comments of concern over noise pollution from rail use. The increase in noise produced by freight trains was of particular concern, with people complaining that passenger trains already produce noise, particularly in Penkridge where the railway runs behind houses.
- 5.8.62. There were enquiries regarding what mitigation measures would be taken to minimise noise pollution. Many raised concerns that trees would not provide a sufficient barrier until they reach

maturity, and enquired as to what would be used until then. Others suggested that trees be put in place before construction to allow them to mature. Suggestions were made to limit train volumes, insulate roads and use effective machinery.

Light pollution

- 5.8.63. People expressed concern about light pollution. There were specific references to flood lighting and the impact this would have; particularly the impact it would have on people's sleep. Reference was made to the application for the riding school, which was rejected on grounds of light pollution.

Visual impact

- 5.8.64. A substantial number of people expressed concern about visual impact/'eye sore'. Reference was made to the sidings, warehouse size and height of buildings and cranes. People highlighted that the visual impact would be more severe considering the Site's Green Belt location and the nearby rural views.

Impact on Canal

- 5.8.65. A number of people expressed concern for the Staffordshire and Worcestershire Canal. People were concerned for the potential disruption to Canal access, as well as the potential impact on the tourism industry. Specifically, people mentioned pollution and the impact of this on wildlife. People requested guarantees to protect the unique environment.

Ecology

- 5.8.66. The most common issue raised concerned the wildlife/habitat/natural environment which would be adversely impacted by WMI. Specific reference was made to the Reservoir area. Concern was expressed over the protection of crested newts, birds of prey, bats, badgers and hedgehogs amongst other species.
- 5.8.67. There were enquiries and expectations regarding whether displaced wildlife/plants/trees would be catered for. People explained that they were concerned with how they would live on concrete.
- 5.8.68. People expressed significant concern about deforestation, particularly due to the impact of this on the area's natural flood defences. There were requests for trees to be established in

particular locations, including on either side of the dual carriageway.

Location-specific issues: Calf Heath

- 5.8.69. There was a request for traffic not to go through Calf Heath and for the southern access for WMI employees not to allow access to Calf Heath village.

Location-specific issues: Gailey

- 5.8.70. A comment was made that Gailey is not mentioned in the Proposed Development, despite it being central to the Proposed Development.

Location-specific issues: Croft Lane

- 5.8.71. One comment suggested that Croft Lane would benefit from being put on gas/sewage mains.

Location-specific issues: Station Road and Station Drive

- 5.8.72. Concern was expressed regarding Station Drive; specifically, the railway bridge's height restriction and poor signage. Comments were made that vehicles being unable to pass here leads to standstills of traffic on Station Drive. Concern was expressed that since vehicles already become stuck here, the rising number of HGVs would only make the problem worse, whilst causing further damage to the bridge structure.

Location-specific issues: Penkrige

- 5.8.73. There was specific concern for the traffic in Penkrige. Particular concern was expressed, because there are currently regular traffic problems, resulting from the M6 congestion and festival traffic. There was concern for how this traffic would affect residents.

Location-specific issues: Coven

- 5.8.74. A comment was made that there should be no traffic through Coven.

Other impacts

- 5.8.75. An enquiry was made about how individuals will be impacted living within the postcode area of ST19 5PN, and another about whether the Four Ashes Public House will be impacted.

Consultation

- 5.8.76. There were requests for more information. Particular requests included: which other SRFI sites had been considered and why they were not selected; effect on house values in locations where similar development has occurred; options report; assessment of operational requirement and full assessment of impacts.
- 5.8.77. There was criticism of the consultation process and treatment of the local community including concerns about causing depression amongst residents and hypocritical behaviour by the landowner.
- 5.8.78. Feedback showed a common belief that people are unhappy/concerned about the Proposed Development stating that there is significant opposition to it and which will be acted upon. Many claimed that most people are against the Proposed Development, including local MPs.
- 5.8.79. The public made requests for consultation to be advertised in advance in the local areas impacted and to widen the mailing area. Multiple complaints were made about Penkrige not being involved in the consultation process, with some people expressing suspicion as to why they had not been included. Suggestions were made about other ways of informing the public about the consultation process.
- 5.8.80. The public expressed feelings that statistics were being manipulated and that the consultation audience was deliberately minimised.
- 5.8.81. There were requests for evidence/information behind the statistics/comments presented or objections to them. People expressed particular scepticism towards the job statistics. People were also confused as to how statistics had been produced.
- 5.8.82. There was specific concern that the people of Penkrige had not been properly informed even though they believed that Penkrige will be impacted by the Proposed Development. People complained that neither locals nor Parish Councillors received information.
- 5.8.83. There was a popular suggestion to consult the residents of Penkrige. Many people stated that residents felt ignored, despite the belief that they will be heavily impacted by traffic from the M6. Several suggestions were made about methods of consultation/advertising.

Property and land

- 5.8.84. Concerns were raised about the impact on house values /people's ability to sell their houses. Comments suggested that many residents feel they now have no choice but to stay where they are because of the price devaluation. Many people made compensation/purchasing requests.
- 5.8.85. There were many enquiries regarding compensation. Some of these related to: compensation levels; relocation requests; cash alternatives; property compensation at full market value plus 25%.
- 5.8.86. People commented that they would not have bought their house/lived in the area/moved to the area had they known the Proposed Development was in prospect. Multiple people referenced the fact they had chosen to live in a rural environment for a reason.

Rights of Way

- 5.8.87. There was concern that footpaths will be lost. Many people expressed concern for the impact this will have on people who regularly use the paths (walking group, children etc.) and expressed disappointment that people will be deterred from walking.

Other general issues

- 5.8.88. There was a great amount of concern and speculation that the Proposed Development is a 'done deal'. Many people made reference to the power of commercial interests (Green Belt, resident opinions, etc.). Various comments were raised relating to the nature of consultation.
- 5.8.89. There were also comments and enquiries regarding job creation. These included: types of jobs available; how they will be advertised; opportunities for local people and the availability of post-construction jobs amongst other enquiries.
- 5.8.90. Concern was expressed towards the extension of industrial West Midlands into rural South Staffordshire. There was confusion or criticism of the name linking it to the West Midlands.
- 5.8.91. There were also comments that the natural area is in danger due to humans and industry. Many people also made reference to the financial gain of landowners.

5.8.92. There was a perception that the Proposed Development has been 'ill thought out'. People referred to the scale of the Proposed Development, its poor location for an SRFI as well as concerns about it as a whole.

5.9. Response to feedback raised as part of Stage 1 Consultation

5.9.1. Following the completion of Stage 1 Consultation, FAL updated its proposals in a number of ways in response to feedback and with the benefit of further technical studies. Many of the issues raised as part of Stage 1 Consultation were incorporated in the development of the Environmental Impact Assessment process and incorporated into the Draft Environmental Statement presented at Stage 2 Consultation.

5.9.2. The tables below provide a summary of the key issues raised as part of the Stage 1 Consultation, FAL's response to these issues and an indication of whether this resulted in a change to the Proposed Development. The 'Change?' column in the tables refers to whether or not the comment or issue summarised led to a change in the Application.

5.9.3. It is important to note that as with any analysis of text-based feedback, there is likely to be a difference of opinion on how certain elements are interpreted or summarised. In addition, to avoid duplication cells have been combined where the regard to response is the same.

Table 5: Stage 1 Consultation - summary of responses and consideration

Topic: Need case and alternatives		
Summary of responses	Regard to responses	Change
<p>The Proposed Development should be moved elsewhere including suggestions that the SRFI should be sited on brownfield land/previously developed/derelict land, as well as various suggestions of alternative SRFI site locations.</p>	<p>Following Stage 1 consultation a detailed draft Alternative Sites Assessment was produced and formed part of the Stage 2 Consultation. The draft Alternative Sites Assessment assessed the SRFI sites that have been considered in selecting the proposed Site. The purpose of the document was to consider whether the Site proposed for WMI is the most suitable, or whether there were any alternative SRFI sites which could meet the need for an SRFI which ought to be preferred. The draft Alternative Sites Assessment established the area in which it is appropriate to search for an alternative SRFI site, setting out the search criteria to assess potential SRFI sites and assessing the suitability of alternative SRFI sites.</p>	N
<p>There were requests for more information which other SRFI sites had been considered and why they were not selected; effect on house values in locations where similar development has occurred; options report; assessment of operational requirement and full assessment of impacts.</p>	<p>It was clear from the draft Alternative Sites Assessment that the key criteria for an SRFI facility, principally the need to efficiently link to both the national road and rail networks, greatly restricts the SRFI development opportunities within the search area. Through the FAL team’s evaluation of the area, it is clear that, apart from WMI, there are no SRFI sites within the search area which represent genuinely suitable locations for an SRFI development.</p> <p>Specifically, the draft Alternative Sites Assessment found that, of the potential alternative SRFI sites which were identified, Meaford Power Station, Mid Cannock Colliery and Stafford West failed to meet one or more of the fundamental criteria (i.e. ability to effectively access both the strategic road and rail network) and were discounted from further consideration. Those SRFI sites also suffered other fundamental constraints – such as size, non-availability and environmental constraints. Creswell, Rugeley Power Station and ROF Featherstone were examined further but, upon detailed inspection, were</p>	

Topic: Need case and alternatives		
Summary of responses	Regard to responses	Change
	<p>found to have difficult highways issues and would require large-scale highway improvements or reliance on existing routes to the strategic road network which pass through built up residential areas. Creswell and ROF Featherstone also have significant site constraints which would result in complex and unsuitable rail connections. For Dunston, the road access concerns are secondary to the main issue which is that the site is an open and rural location, protected as Open Countryside and a development of the size and scale of an SRFI would be very difficult to successfully assimilate or mitigate in landscape and visual terms. The resultant effects on the landscape character of the site and its visual impacts would be much greater at Dunston than at WMI owing to its topography, openness and rural character, and the absence of screening as well as the absence of existing industry or urban influences from its setting.</p> <p>At every opportunity, the draft Alternative Sites Assessment adopted a comprehensive and inclusive methodology and the findings have demonstrated that, even when utilising a search methodology which goes beyond what an operator would normally consider reasonable, there are still no suitable alternative locations to the Site.</p>	

Topic: Site suitability		
Summary of responses	Regard to responses	Change
Concern about the loss of Green Belt: the need to retain Green Belt land and the Proposed Development does not justify special	Proposals for development in the Green Belt are by definition inappropriate and it is for FAL to demonstrate very special circumstances. A draft of the Planning Statement was published at the Stage 2 Consultation and summarises the history of the West Midlands Green Belt. It is demonstrated that the Green Belt boundaries in South Staffordshire are tightly drawn and have not been	N

Topic: Site suitability		
Summary of responses	Regard to responses	Change
<p>circumstances to overrule Green Belt legislation.</p> <p>Concern that the Proposed Development would stimulate urban sprawl/over industrialisation/future extensions/development beyond the Site.</p>	<p>reviewed to address large-scale employment land requirements since 1996 at least. The ongoing failure of strategic planning policy in the West Midlands to review the Green Belt boundaries has resulted in an increasing shortage of suitable Sites for development.</p> <p>As a result, the West Midlands Green Belt boundaries are acknowledged to be out of date with a number of authorities in the West Midlands region, including South Staffordshire, accepting that employment and housing needs cannot be met without a long overdue Green belt review, even for small-scale development.</p> <p>Taken together, the South Staffordshire Core Strategy Development Plan (2012) and draft Site Allocations Document identify that even small-scale housing and employment needs could not be addressed without a Green Belt review. It follows that the need for a SRFI in South Staffordshire can only be met by development in the Green Belt.</p> <p>In this context, the conclusions of the draft Alternative Sites Assessment mean that national policy objectives clearly expressed in the National Networks National Policy Statement (the NPS) to meet the compelling need for a network of large-scale strategic rail freight interchanges will not be met unless Green Belt development is permitted in principle – and specifically at the Site.</p>	
<p>Concern at the potential loss of mineral reserves on the Site.</p>	<p>The Proposed Development will not extract the remaining mineral resource. The mineral resource contained within the Site is not considered important or significant in the context of the Minerals Local Plan and the 'loss' of the minerals in the Minerals Local Plan period is not considered significant in the context of the benefits of the Proposed Development.</p>	N

Topic: Site suitability		
Summary of responses	Regard to responses	Change
The site is too large and should not cross Vicarage Road.	The site area proposed at WMI will allow the delivery of a new intermodal rail terminal for the Local Enterprise Partnership (LEP) market area, responding to the severe scarcity of supply and with rail-served warehousing. This proposal is a direct response to the scale of the unmet need for rail-served warehousing in the north-west of the West Midlands. The WMI proposals, therefore, are of sufficient scale to be attractive to the market and to secure the frequency of trains necessary to achieve a high quality rail-served centre for distribution. This would enable significant modal shift away from exclusively HGV based distribution, which is characteristic of the area.	N
Concern that countryside is being ruined/disturbed.	<p>The WMI Site is surrounded and intersected by a number of urban and industrial influences, including the A449, the A5, the M6, the West Coast Main Line, the Staffordshire and Worcestershire Canal, Calf Heath Reservoir, the Four Ashes Industrial Estate, the SI Group Chemical Plant and the Calf Heath Quarry.</p> <p>Also adjacent to the Site boundary is the Veolia Energy Recovery Facility, the Severn Trent Sludge Disposal Centre and the Gestamp Stamping Factory to the south, with the Rodbaston Wind Farm approximately 1km to the north.</p> <p>The extent of the Site therefore falls within this heavily urbanised and industrialised area, with a strong landscape and green infrastructure strategy proposed as part of the scheme to ensure that the impact of the Site on the surrounding landscape will be minimised.</p> <p>The majority of the countryside surrounding the WMI Site lies within the Green Belt, and therefore no further development will come forward on the land</p>	N

Topic: Site suitability		
Summary of responses	Regard to responses	Change
	surrounding the Site unless very special circumstances are demonstrated to exist to justify inappropriate development.	

Topic: Environment - general		
Summary of responses	Regard to responses	Change
General concern about environmental impacts	FAL is required to undertake an Environmental Impact Assessment of the Proposed Development. This process identifies the likely significant environmental impacts (both beneficial and adverse) of the Proposed Development and aims to prevent, reduce and offset any potential significant adverse environmental effects. The Assessment includes residential amenity. A comprehensive Environmental Statement will be submitted as part of the Development Consent Order application, which will provide details of the Environmental Impact Assessment undertaken.	N
Concern about impact on local villages/residential amenity.		

Topic: Air quality		
Summary of responses	Regard to responses	Change
Concerns about air pollution and potential impacts on health.	At Stage 1 Consultation there was insufficient information to address the potential impacts and effects on air quality and carbon as a result of the Proposed Development; provide any mitigation or control measures required to reduce or eliminate adverse effects; or the subsequent residual effects and likely significant effects associated with the Proposed Development.	N

Topic: Heritage		
Summary of responses	Regard to responses	Change
Concern about the loss of a heritage asset provided by the Canal Conservation Area.	The impact of the Proposed Development on the Staffordshire and Worcestershire Canal Conservation Area is included as part of the Environmental Impact Assessment.	N
Concern for the Staffordshire and Worcestershire Canal in terms of access and on tourism industry.	<p>Effects of the development on Amenity have been assessed in the Socio-Economic and Human Health Chapter (Chapter 14) of the Draft Environmental Statement under the "Recreation and Amenity" sections under both construction and operational effects assessments.</p> <p>Amenity assessments relate to potential effects on visitors, including tourists, considering how potential effects of the development such as noise or traffic could impact on the usefulness or desirability of living in, working in or visiting the local area.</p>	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses	Change
Concern about the loss of Calf Heath Wood, loss of tress generally and the impact of this on wildlife habitats	A proportion of the existing Calf Heath Wood would be retained at the centre of the Site. The Proposed Development would provide further biodiversity enhancement landscaping that will include the planting of native trees and shrubs, including native hedgerows that will provide habitat for a number of bird species and small mammals.	N
Concern was expressed about protected species.	All protected species are included in the Environmental Impact Assessment for the Proposed Development. This is detailed in the Ecology and Nature Conservation chapter of the Draft Environmental Statement presented at Stage 2 Consultation.	N

Topic: Landscape and visual		
Summary of responses	Regard to responses	Change
Concern about the visual impact of the Proposed Development including size and height of buildings and cranes	<p>Cannock Chase Area of Outstanding Natural Beauty was included in the Landscape and Visual Assessment. Changes to the scheme to respond concerns about visual impact raised include the following:</p> <ul style="list-style-type: none"> • A reduction in the height parameters of the buildings to a maximum of 30m to the ridge. The proposal at Stage 1 was up to 36m. • A restriction on the highest buildings (up to 30m) to a central part of the development zones where they are least visible from Shoal Hill AONB. • The development of a Green Infrastructure plan to soften the impacts of the buildings on the surrounding areas. • The new link road from the A5 was moved 30m to the east to reduce any impact on the setting of the conservation area. As a result, it has allowed for the introduction of an additional landscape buffer. 	Y
Concern that mitigation will not work especially banking for visual impact.		
Request that the visual impact on the Cannock Chase Area of Outstanding Natural Beauty (AONB) be considered.		
People expressed concern about light pollution	A draft lighting strategy was provided as part of the Draft Environmental Statement presented at Stage 2 Consultation. This was designed to minimise spill light and light pollution to the surrounding areas, minimise sky glow and ensure safety and security on-site.	N

Topic: Noise and vibration		
Summary of responses	Regard to responses	Change
General concern for noise pollution.	<p>Detailed noise studies took place after the Stage 1 Consultation and as a result the layout was amended in a number of areas in order to introduce a range of noise attenuation measures. The masterplan layout was optimised and adjusted to limit noise impacts. This included measures such as extensive bunding to screen properties from sources of noise. An example includes the</p>	N
Concern that noise from traffic in the area is already an issue,		

Topic: Noise and vibration		
Summary of responses	Regard to responses	Change
particularly from the M6 in Penkridge, Calf Heath and Dunston.	warehousing proposed in the south east of the Site, closest to Calf Heath village. There, additional landscaping has been introduced and the principal unit has been designed as 'single sided' so that its servicing activity can be oriented away for the community with the warehouse acting as its own noise barrier. The location of the rail interchange west of the West Coast Main Line (WCML) also has benefits in this respect, as the principal rail activity is concentrated adjacent to the existing rail line and the Four Ashes industrial estate, rather than introducing new rail activity into the area east of the canal. Extensive landscaping and screening is also proposed to protect the properties on Station Drive from noise and lighting impacts from the terminal.	
Concern about noise pollution, produced by rail use.		
Request for mitigation measures to minimise noise pollution.		

Topic: Transport and access		
Summary of responses	Regard to responses	Change
Concern about congestion and traffic flow on A449, A5 and other local roads.	There were a number of changes to the Proposed Development in response to these issues, most notably to agree that the new road through the Site from the A5 to the A449 should be publically accessible in order to make this the principal route between the two trunk roads and the M6. This would provide an improvement to the operation of the Gailey roundabout by providing an alternative route for movements between the A5 and A449 and improve local traffic flow. In addition, a series of traffic mitigation measures were brought forward to address concerns raised by local people at Stage 1 including:	Y
Concern about the poor suitability of the roads and requests to improve the road network.		
Concern about the poor suitability of the roads, or requesting improvements to the road network.		
Concern about the increase in HGV numbers.		

Topic: Transport and access		
Summary of responses	Regard to responses	Change
concern about staff access to the Site from Vicarage Road	<p>improved pedestrian and cycle access, including new infrastructure and addressing existing issues with crossings, footways and cycleways, as well as improvements to the Canal towpath</p> <ul style="list-style-type: none"> • A Framework Travel Plan – outlines possible enhanced bus provision which could include a mix of additional public services and dedicated WMI buses • An HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I) – sets out how the movement of HGVs will be managed on and off the Site including details of restricted routes and measures to enforce these restrictions. • Banning the right turn from the A449 into Station Drive. Vehicles requiring direct access will need to utilise the new roundabout to turn around, further north at the junction with Gravelly Way. This has the result of reducing the total number of vehicles using Station Drive and Station Road. • Providing a turning area on the west side of the low railway bridge on Station Drive. This means that HGVs which do inadvertently turn into Station Drive can turn around without blocking the road or undertaking a dangerous movement, such as reversing back to the A449. • Making Crateford Lane one way eastbound. This means that egress is maintained for local residents whilst preventing existing rat running. <p>These elements were all included as part of the Stage 2 Consultation and included in the traffic modelling that was subsequently undertaken to assess the base traffic flows against those anticipated when the scheme reaches maturity. This modelling was carried out and rigorously tested with Highways England and with the local highways authority - Staffordshire County Council.</p>	
Concern about the Proposed Development exacerbating rat running.		
Concern about potential delay in time in reaching the hospital in Wolverhampton and impact on local services such as response times for police and ambulance services.		
There was a request for traffic not to go through Calf Heath.		

Topic: Transport and access		
Summary of responses	Regard to responses	Change
Suggestion that southern access for WMI employees should not allow access to Calf Heath village.	The draft Transport Assessment that has been prepared to support the Stage 2 Consultation demonstrates that it will not be necessary for future employees to travel through Calf Heath in order to access the site. Journeys will be quicker via the A5.	
Particular concern was expressed because there are currently regular traffic problems (M6 congestion, festivals).	It has been agreed with Highways England that the traffic impact of the development proposals can be satisfactorily mitigated on the Strategic Highway network.	
Concern that occupants will not be obliged to use the rail terminal and that it will simply become a logistics centre.	Such a provision has not been required on other schemes for the simple reason that occupiers would not accept such a restriction on their business operations. It has been shown and tested in previous SRFI projects that forcing tenants to use the rail will deter many from coming to a site, but the strength of the offer at WMI is that it can offer good rail and road connections. The provision of the rail facility will encourage and attract occupiers to use rail and, as evidenced from other rail-served schemes, the availability of rail is one of the key reasons why an occupier locates to such a scheme. The s106 obligations support a rail coordinator's role to develop use of the rail terminal. Kilbride has a long record of encouraging and persuading new users to switch to rail, which is a strength of the proposed WMI proposals.	N
Concern for additional train/rail journeys	Network Rail is wholly responsible for pathing of trains to and from WMI, and would not develop a timetable solution which in any way compromised existing passenger (or freight) services. Paths for new trains to and from WMI would be applied for by the freight train operating companies (not by FAL) through established industry processes, which have been used successfully by other SRFIs over the last 20 years.	N

Topic: Transport and access		
Summary of responses	Regard to responses	Change
Concern about road safety.	All highway mitigation measures would be subject to an independent road safety audit and, where necessary, alterations will be made to the general highway arrangements proposed, in order to reflect the findings of the audits.	N

Topic: Water, Environment and Flood Risk		
Summary of responses	Regard to responses	Change
Concern about impact on high water table and flooding including at Stable Lane, Calf Heath lanes, Station Drive, Vicarage Road and Woodlands Lane	A sustainable drainage strategy was provided as part of the Draft Environmental Statement presented at Stage 2 Consultation which was designed to ensure that the proposals do not have an adverse effect on the environment. It is not proposed to make any alterations to the existing drainage arrangements for these roads and the existing ditch networks into which these roads discharge are proposed to be retained.	N
Impact on Four Ashes Pit Site of Special Scientific Interest	Four Ashes Pit SSSI is a geological SSSI and was covered in Ground Conditions Chapter 11 of the Draft Environmental Statement presented at Stage 2 Consultation.	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses	Change
Concern that both Masterplan options have equally serious impacts	FAL fully considered all responses with regard to the two Masterplan options. Following the Stage 1 Consultation FAL chose to develop the West Option. A summary of the key considerations for this choice is provided below:	Y
Concern about the East Option in terms of destruction of the Canal and proximity and impact on Calf Heath.	The East Option would have required a rail bridge over the Canal to deliver trains to the rail terminal. Whilst the location of the terminal within the development had some advantages, these were outweighed by other factors. In particular, the impact of the bridge on that section of the Canal Conservation	

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses	Change
<p>Concern about the West Option due to the proximity to residents and requirement for more internal movements than East Option.</p>	<p>Area in the north of the Site. This was a significant factor in ultimately developing the West Option to take forward for Stage 2 consultation.</p> <p>Other factors included an assessment that a rail terminal to the east of the Site would limit the ability to plan a layout with the flexibility that would reduce local environmental effects. In addition, clear feedback was received from rail freight operators that a rail terminal located in the west of the Site would be preferred because it would provide a more efficient SRFI, with a greater ability to receive, load and unload trains more quickly and efficiently.</p> <p>With the benefit of Stage 1 feedback, FAL further refined both Illustrative Masterplans for both Options before selecting the West Option. As part of this exercise the FAL team took account of the environmental impacts, community impacts, market advice and soundings from rail freight operations experts. In working up both Illustrative Masterplans to take account of these impacts, a significant number of changes were made. These were incorporated into the Illustrative Masterplan and Parameters Plans proposed as part of the Stage 2 Consultation.</p> <p>The following principal changes were made to the Illustrative Masterplan as a result of the Stage 1 Consultation and further assessment undertaken between Stage 1 and the Stage 2 Consultation:</p> <ul style="list-style-type: none"> • Internal roads and the A5 roundabout were relocated 30m to the east to reduce impact on the setting of the Canal Conservation Area and the two listed buildings, as a result of expert heritage advice. 	

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses	Change
	<ul style="list-style-type: none"> • A 20m landscape buffer was introduced along the western boundary of Illustrative Unit 3030, to enhance ecological connectivity through the Site. • The rail terminal layout was refined to allow the rail terminal to accept full-length 775m trains without splitting – dividing the trains into smaller lengths to fit in the terminal. This required the reconfiguration of Gravelly Way and the introduction of a new road bridge. • The rail terminal footprint was reconfigured and reduced, allowing for additional landscape screening to the A449 and to minimise the impact of the terminal on residents on Station Drive. • Additional mitigation land was brought into the Proposed Development to mound and landscape so as to reduce the impact of the terminal on the residents of Station Drive. • Additional land was brought into the Proposed Development to create a community park to the south. • The layout of the buildings to the south of Vicarage Road was altered to retain existing veteran trees, hedgerows and pond and to reduce the impact on Calf Heath village through detailed landscaping changes and by altering the buildings to be single sided units. • The amount of green space across the scheme was increased, with ecological and pedestrian connectivity enhanced within the Site. <p>In addition, negotiations to enter purchase agreements were entered into with a number of property owners whose properties were in close proximity to the Site or within the Site. This was undertaken to reduce any hardship caused by the Proposed Development on local residents.</p>	

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses	Change
Concern about Calf Heath Reservoir access.	Access to Calf Heath Reservoir would not be affected by the Proposed Development.	N

Topic: Consultation		
Summary of responses	Regard to responses	
Criticism of the consultation process. Not enough information was provided.	<p>Projects applying for development consent under the Act have to carry out pre-application consultation that fulfils certain requirements before they can be accepted for examination by the Planning Inspectorate. In addition to consulting various statutory bodies and people whose land may be affected, the Act sets out how the community should be consulted.</p> <p>The Stage 1 Consultation was an opportunity for members of the public and stakeholders to influence the early stage development of the scheme before more detailed proposals were developed.</p> <p>The Stage 1 Consultation was promoted widely in the local area and regionally and included three exhibitions. Just under 300 pieces of feedback were received from the public in addition to responses from statutory consultees. This feedback has helped us to develop the scheme to a more detailed stage ahead of the Stage 2 Consultation, which is a statutory requirement.</p>	N
Criticism that Penkridge is not being involved in the consultation process.	FAL has responded positively to this concern and, following discussions with South Staffordshire District Council, included all properties in Penkridge in the Consultation Zone mailing for the Stage 2 Consultation. Figure 8 shows the Consultation Zone for the Stage 2 Consultation.	Y

Topic: Consultation		
Summary of responses	Regard to responses	
People expressed particular scepticism towards the job statistics.	An SRFI of this scale and quality would be capable of supporting an estimated 8,550 jobs directly. Jobs would be accessible in terms of skills and qualifications to employees within the travel catchment. Further details of this figure were provided as part of the Stage 2 Consultation (see the Socio-Economics chapter of the Draft Environmental Statement).	N

Topic: Other		
Summary of responses	Regard to responses	Change
Whether the Four Ashes Public House will be impacted.	An assessment of the potential effects of the development on businesses including Four Ashes Public House is presented in the Socio-Economic and Human Health Chapter (Chapter 14) of the Draft Environmental Statement.	N
Concern that footpaths will be lost.	Whilst a small number of existing footpaths will be lost as part of the Proposed Development, a network of new footpaths will be established within the new Community Parks which will increase public accessibility to the Site.	N
The Proposed Development is a 'done deal'.	WMI is classed as a Nationally Significant Infrastructure Project. As such it requires a Development Consent Order to be built. The final decision whether to approve the Development Consent Order will be made by the Secretary of State for Transport.	N
Concern about the types of jobs available; how they will be advertised; opportunities for local people and the availability of post-construction jobs amongst other enquiries.	<p>An estimated 8,550 jobs will be created across a wide range of skill levels and with training opportunities. Jobs would be accessible in terms of skills and qualifications to employees within the travel catchment.</p> <p>With regard to advertising and availability of jobs, this was outlined in the Socio-Economics Chapter of the Draft Environmental Statement, and FAL is committed to establishing an Employment, Skills and Training Plan Framework with local stakeholders.</p>	N

Topic: Other		
Summary of responses	Regard to responses	Change
Criticism of the scheme name linking it to the West Midlands.	The Site is located within Staffordshire, which is considered to be with the West Midlands region.	N
Concern that that the Proposed Development should not only benefit FAL.	FAL's objective is to carry out a profitable development at WMI while also being committed to doing all it can to mitigate impacts. The Proposed Development will provide extensive benefits to the local area as set out in the Socio-Economics chapter of the Environmental Statement (Document 6.2, Chapter 14).	N
Gailey is not mentioned in the Proposed Development.	Gailey is mentioned throughout the Stage 1 and Stage 2 Consultation documents. Where appropriate, its location has been indicated on maps and plans.	N
Concern about the impact on the ability for people to sell their houses.	Following Stage 1 Consultation, negotiations to enter purchase agreements were entered into with a number of property owners whose properties were in close proximity to the Site or within the Site. This was undertaken to reduce any hardship caused by the Proposed Development on local residents.	N
Concern about the impact on house prices generally.	The effect on house prices as a result of this development, as with all types of development, is not material to the planning merits of the proposal.	N

5.10. Conclusions

- 5.10.1. The table above demonstrates how FAL took account of every response received during the Stage 1 Consultation in evolving its plans ahead of the Stage 2 Consultation.

6. Stage 2 Consultation under section 42

6.1. Introduction

- 6.1.1. This Chapter details the Stage 2 consultation with consultees carried out in accordance with section 42 of the Act between 5 July 2017 and 30 August 2017 (8 weeks).
- 6.1.2. The activities carried out to fulfil the requirements of section 42 of the Act are detailed in full at paragraph 6.4. This Chapter in combination with Chapters 7, 8 and 9 provide the information required under section 37(7)a of the Act and the relevant guidance and the Planning Inspectorate (PINS) advice on pre-application consultation.

6.2. Duty to consult under section 42

- 6.2.1. Section 42(1) of the Act states:

42. Duty to consult

The Applicant must consult the following about the proposed application—

(a) such persons as may be prescribed,

(aa) The Marine Management Organisation, in any case where the Proposed Development would affect, or would be likely to affect, any of the areas specified in subsection (2)

(b) each local authority that is within section 43,

(c) the Greater London Authority if the land is in Greater London, and

(d) each person who is within one or more of the categories set out in section 44

- 6.2.2. Sections 42(aa) and 42(c) are not relevant to the Proposed Development.
- 6.2.3. For the purposes of section 42(1)(a) of the Act, the persons prescribed are those listed in column 1 of the table in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations).
- 6.2.4. Section 42(1)(b) (local authorities) are defined in section 43 of the Act. The relevant local authorities pursuant to section 43 for the purposes of the application are explained at paragraph 6.3.6 below.
- 6.2.5. Section 42(1)(d) (persons within section 44 of the Act) are:

- owners, lessees, tenants or occupiers of the land to which the Proposed Development relates (referred to as Category 1 persons);
- those persons who are interested in the land or have power to sell and convey the land or to release the land (referred to as Category 2 persons); and
- those persons who might be entitled to make a relevant claim if the Order sought were to be made and fully implemented (referred to as Category 3 persons).

6.2.6. There is a duty on the applicant, when consulting a person under Section 42, to notify them of the deadline for receipt of comments to the consultation. This must be a minimum of 28 days, commencing on the day after the day on which the person receives the consultation documents. Consultation materials must be supplied to the person by the applicant.

6.3. Identification of section 42 consultees

Prescribed consultees

- 6.3.1. As part of section 42 consultation, Four Ashes Limited (FAL) compiled a list of statutory consultees which was principally derived from the prescribed consultees listed in column 1 of the table in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations).
- 6.3.2. The list of prescribed consultees under the APFP Regulation includes 'Relevant Statutory Undertakers'. Table 2 of the appendix to the PINS Advice Note 3 (EIA consultation and notification) sets out that relevant public gas transporters and relevant electricity licence holders are deemed statutory undertakers. The footnotes to these entries provide links to the published lists of electricity and gas licence holders. The footnote states that licences are not always restricted to a geographic area and states that PINS will take a precautionary approach and consult all licence holders whose licence cover Great Britain.
- 6.3.3. In determining the relevant bodies to be included in the list, FAL decided to take an approach of reviewing the list and ruling out those where the licence was limited geographically or where it appeared that the entity would not be relevant to the Proposed Development. An example of this was LNG Portable Pipeline Services Limited. When FAL reviewed their operation they did not appear to operate within or near the Order Limits. On further

investigation it appeared that the company had their Gas Transporter Licence revoked in 2016 and the company was subsequently dissolved in 2017. For these reasons they were not included as a statutory undertaker in the list of prescribed consultees. Notwithstanding this example where it was not possible to discount an entity, they were included in the list.

6.3.4. The prescribed consultees can be found in the list of section 42 consultees at Appendix C.

Parish Councils

6.3.5. The parish councils which cover the area of the Proposed Development are:

- Penkridge Parish Council;
- Brewood and Coven Parish Council;
- Hatherton Parish Council; and
- Saredon Parish Council.

6.3.6. These Parish Councils are included in the list of section 42 consultees at Appendix C.

6.3.7. In addition, the following parish councils were also consulted:

- Cheslyn Hay Parish Council;
- Dunston with Coppenhall Parish Council;
- Lapley, Stretton and Wheaton Ashton Parish Council;
- Featherstone Parish Council;
- Great Wyrley Parish Council;
- Shareshill Parish Council;
- Hilton Parish Council; and
- Huntington Parish Council.

Local authorities

6.3.8. Section 43 are local authorities where the applicant has a duty to consult them (section 42(a)). There are "A", "B", "C" and "D" category local authorities.

6.3.9. The Site is within the administrative area of South Staffordshire District Council – this is the "B" authority for the purposes of section 43.

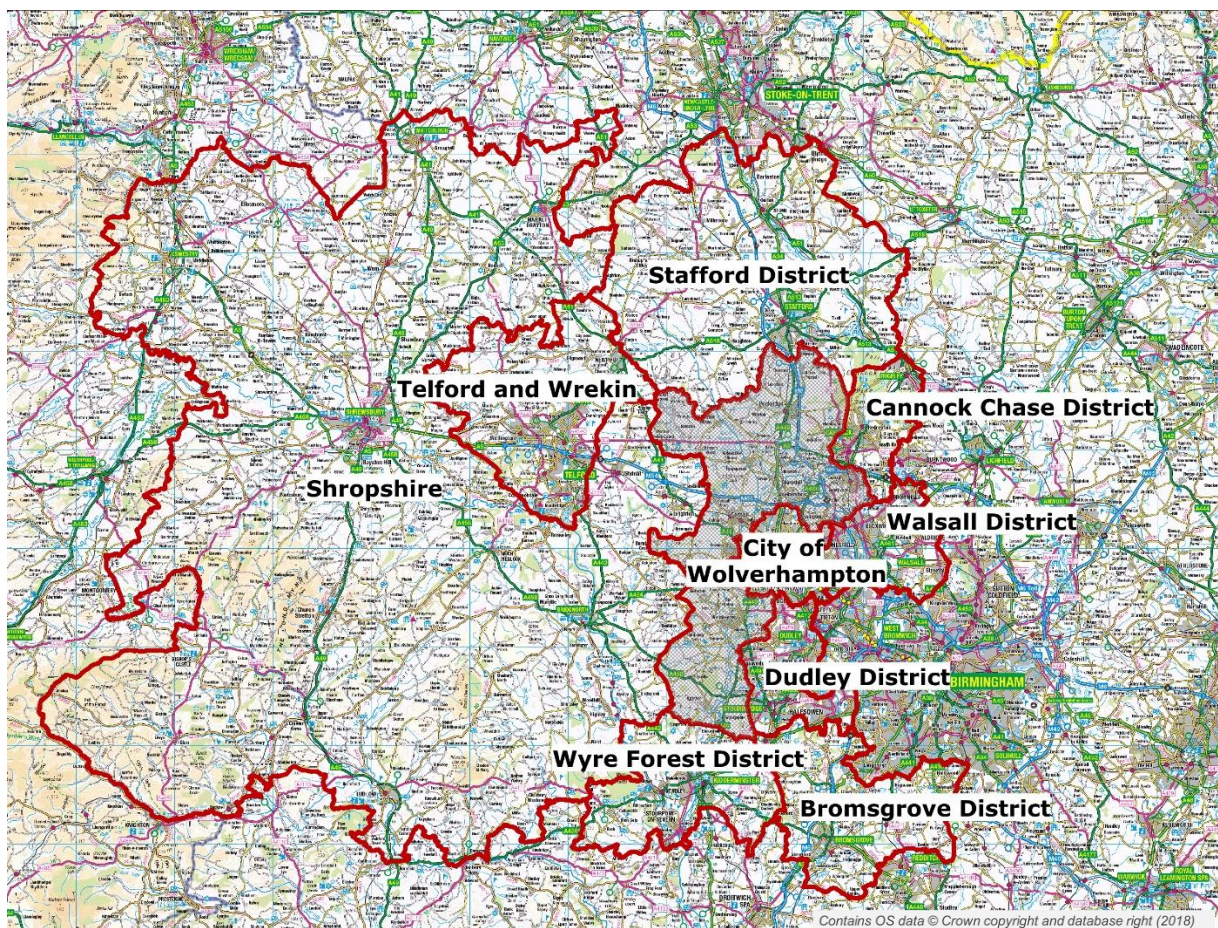
Figure 3: Plan showing 'B' authority



6.3.10. The following councils share a boundary with South Staffordshire District Council and are therefore “A” authorities for the purposes of section 43:

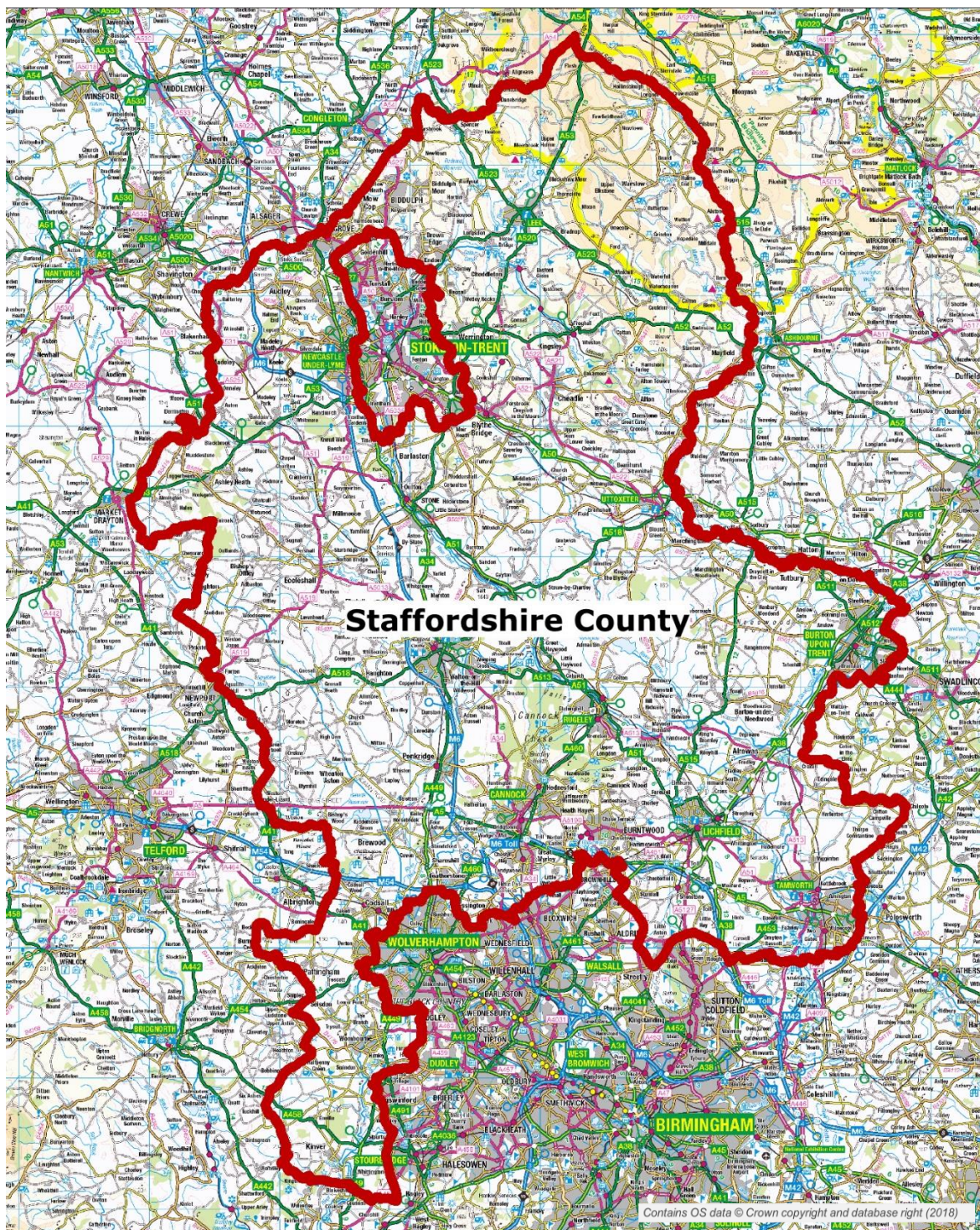
- Stafford Borough Council;
- Cannock Chase District Council;
- Walsall Council;
- City of Wolverhampton Council;
- Dudley Metropolitan Borough Council;
- Bromsgrove District Council;
- Wyre Forest District Council;
- Shropshire Council; and
- Telford and Wrekin Council.

Figure 4: Plan showing 'A' authorities



6.3.11. The upper-tier county council (the “C” authority for the purposes of section 43) for the Site is Staffordshire County Council.

Figure 5: Plan showing ‘C’ authority



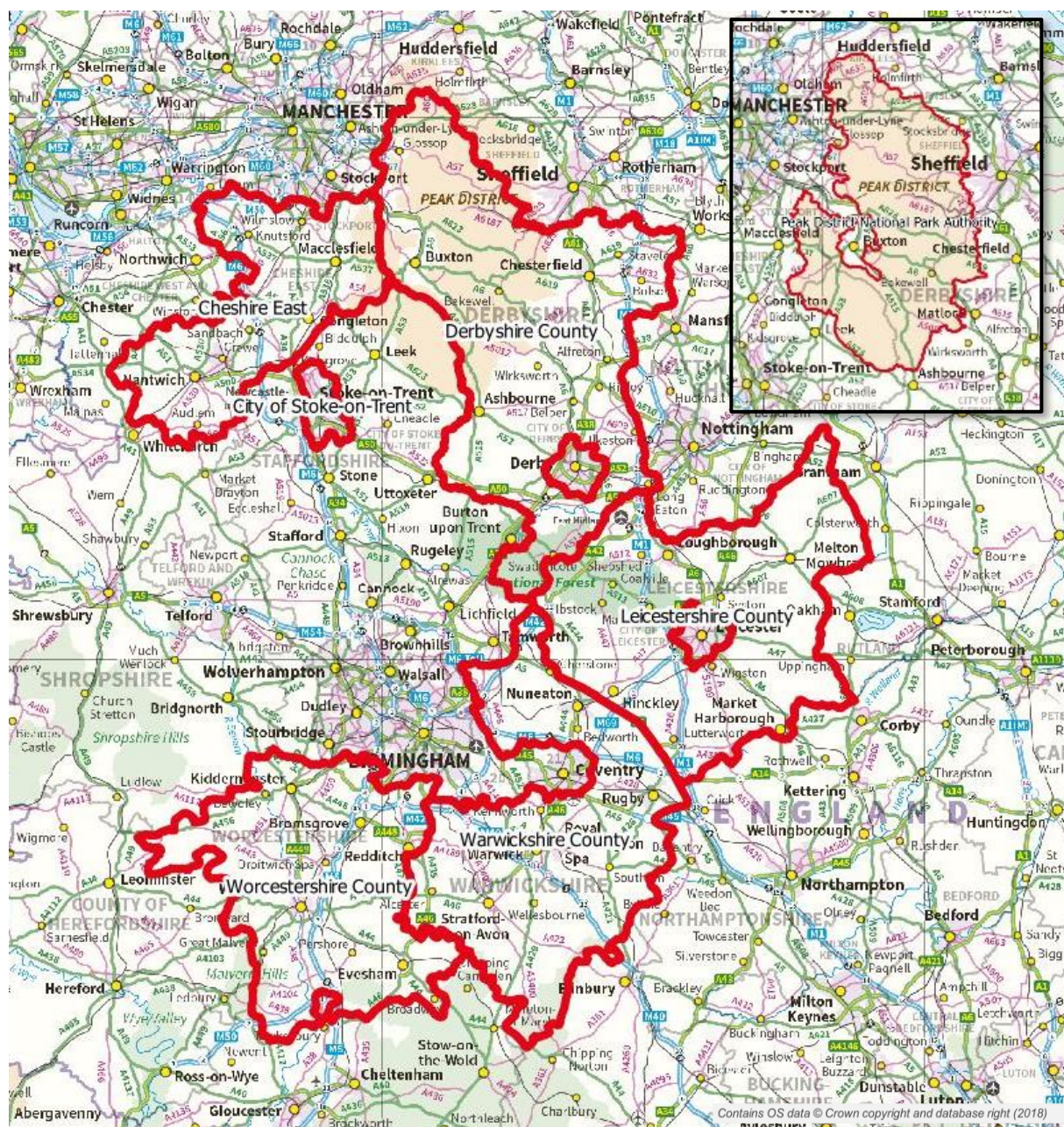
6.3.12. The following councils are unitary or upper tier county councils which share a boundary with Staffordshire County Council, and are therefore "D" authorities for the purposes of section 43:

- Leicestershire County Council;
- Derbyshire County Council;
- Cheshire East Council;
- Stoke-on-Trent City Council*;
- Warwickshire County Council;
- Worcestershire County Council;
- Birmingham City Council;
- Peak District National Park Authority; and
- West Midlands Combined Authority.

6.3.13. *During the Stage 2 Consultation, Stoke-on-Trent City Council was omitted to be consulted. As soon as this was identified, FAL contacted Stoke-on-Trent City Council and held a meeting with the Council on 28 November 2017 to explain the Proposed Development and ask for any feedback. Following the meeting, Stoke-on-Trent City Council did not formally respond or provide any feedback. FAL ensured that the Council was given more than the statutory minimum period of 28 days to provide any feedback.

6.3.14. A plan showing the 'D' authorities is provided below. Note: The West Midlands Combined Authority is not identified on the plan. Its constituent authorities are Birmingham City Council, City of Wolverhampton Council, Coventry City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council and Walsall Borough Council.

Figure 6: Plan showing 'D' authorities



6.3.15. The local authorities consulted, as outlined above are all included in the list of section 42 consultees at Appendix C.

Section 44 – Persons with an Interest in the Land

6.3.16. Persons within section 44 of the Act are commonly described as ‘Persons with an Interest in the Land’ (PILs).

- 6.3.17. In order to establish the identity of PILs, FAL carried out detailed land referencing. All PILs identified during land referencing were notified as part of section 42 consultation. The list of PILs is not included in this document owing to data protection requirements.
- 6.3.18. The Book of Reference (**Document 4.3**) submitted as part of the application sets out the persons/bodies which fall within the categories defined in section 44.
- 6.3.19. FAL also erected a number of site notices around the Site where it had been ascertained that there were interests in the Site where the beneficiary of such interests was unknown. Copies of these notices can be found in Appendix D. These interests are noted in the Book of Reference. The notices were inspected and maintained throughout the consultation period.

Discretionary organisations

- 6.3.20. The Department for Communities and Local Government (DCLG) guidance notes that for any given sector there are a wide range of consultees, in addition to those prescribed, that may be able to make an important contribution in developing an application.
- 6.3.21. The additional organisations which FAL consulted as part of the Stage 2 Consultation can be found in the list of section 42 consultees at Appendix E.

6.4. Consultation activity with section 42 consultees

- 6.4.1. All statutory consultees were written to on 4 July 2017, inviting comments on the Proposed Development under section 42 of the Act. The letters stated that consultation opened on 5 July 2017 and that responses needed to be returned by 30 August 2017.
- 6.4.2. The following consultation materials were enclosed with the letter:
- A covering letter (see Appendix F);
 - A copy of the section 48 notice (see Appendix G); and
 - A copy of the consultation Newsletter (Appendix H).
- 6.4.3. Letters were issued by First Class Royal Mail post. The letter included direction to the website, where all the consultation documents were available. In addition, a USB containing all of the documents was available to any consultee who requested it.
- 6.4.4. The letter and enclosures constituted the section 42 'consultation documents' referred to in section 45(3) of the Act. In accordance with section 45(1) and (2) of the Act, the letter gave a deadline

of 30 August 2017 (being more than the minimum 28 day period required under section 45(2)) for the receipt of comments on the consultation.

6.5. Section 46 notification

- 6.5.1. In addition to consultation under section 42, FAL is required to notify the Secretary of State of the application under section 46 of the Act. This must be done on or before starting consultation under section 42. The Secretary of State must be supplied with the same information as is used for section 42 consultation.
- 6.5.2. FAL wrote to PINS on 3 July 2017 setting out its intention under section 46 to submit an application for a Development Consent Order (DCO). Appendix I contains a copy of the section 46 notification to the Secretary of State. The letter enclosed copies of the letter sent to all consultation bodies pursuant to section 42, 43 and 44 of the Act (Appendix F), the consultation Newsletter (Appendix H) and section 48 notice (Appendix G). An acknowledgement of receipt was provided by PINS. This can be found with Appendix I.

6.6. Conclusions

- 6.6.1. The above details the steps FAL has taken to comply with the statutory requirements for consultation. A summary compliance table for ease of reference is contained at Appendix A.

7. Stage 2 Consultation: Statement of Community Consultation

7.1. Introduction

7.1.1. This Chapter includes the details of how the Statement of Community Consultation (SoCC) was prepared, consulted and published following the process set out in section 47 of the Act.

7.2. Section 47 of the Act: Duty to consult local community

7.2.1. Section 47 states:

- (1) *The Applicant must prepare a statement setting out how the Applicant proposes to consult, about the proposed Application, people living in the vicinity of the land.*
- (2) *Before preparing the statement, the Applicant must consult each local authority that is within section 43(1) about what is to be in the statement.*
- (3) *The deadline for the receipt by the Applicant of a local authority's response to consultation under subsection (2) is the end of the period of 28 days that begins with the day after the day on which the local authority receives the consultation documents.*
- (4) *In subsection (3) "the consultation documents" means the documents supplied to the local authority by the Applicant for the purpose of consulting the local authority under subsection (2).*
- (5) *In preparing the statement, the Applicant must have regard to any response to consultation under subsection (2) that is received by the Applicant before the deadline imposed by subsection (3).*
- (6) *Once the Applicant has prepared the statement, the Applicant must –*
 - (a) *make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land;*
 - (b) *publish in a newspaper circulating in the vicinity of the land a notice stating where and when the statement can be inspected, and*
 - (c) *publish the statement in such manner as may be prescribed.*
- (7) *The Applicant must carry out consultation in accordance with the proposals set out in the statement.*

7.3. SoCC process

- 7.3.1. The primary goal of the SoCC was to set out a consultation that fully complied with the statutory requirements and government guidance on pre-application consultation for Nationally Significant Infrastructure Projects, while also carrying out an effective consultation to ensure that people living and working in the vicinity of the area have the opportunity to engage in the process.
- 7.3.2. Four Ashes Limited (FAL) reviewed feedback from Stage 1 about the consultation process in developing its SoCC. Feedback included the suggestion of additional venues, more meetings, a larger Consultation Zone and more information, which were addressed where practicable.

7.4. Consultation on draft SoCC

- 7.4.1. A draft SoCC was submitted to South Staffordshire District Council and Staffordshire County Council (the relevant section 43(1) Local Authorities) on 10 May 2017. This draft can be found in Appendix J. It was requested that the local authorities return responses by 9 June 2017 (in excess of the minimum 28 period required by section 47(3) of the Act).
- 7.4.2. A copy of the emails that were sent to the local authorities can also be found in Appendix J.
- 7.4.3. South Staffordshire District Council responded to the consultation on 9 June 2017 and Staffordshire County Council responded on 14 June 2017, a late response by the County Council was agreed. Copies of the letter and email can be found at Appendix J.
- 7.4.4. The local authorities' comments on the draft SoCC and FAL's response to them are included in the tables below:

Table 6 Comments from South Staffordshire District Council on the draft SoCC

South Staffordshire District Council comment	FAL response
Requested that FAL states its intention to make direct contact with the following bodies and invite dialogue/engagement in order to seek their views at Stage 2:	N/A
<ul style="list-style-type: none"> Parish Councils within the environs of the Site (state the names) 	A list of Parish Councils was added to the SoCC at paragraphs 5.1.2. Additional Parish Councils were sent information about the consultation. Reference to these can be found at paragraph 5.1.4 of the SoCC.
<ul style="list-style-type: none"> Stoke and Staffordshire LEP 	The SoCC stated that FAL would consult with local groups such as Local Enterprise Partnerships (LEPs). Local Enterprise Partnerships were sent information about the consultation. Reference to these can be found at paragraph 5.1.4 of the SoCC.
<ul style="list-style-type: none"> Local protest group (Stop the Gailey Rail Hub) 	The SoCC stated that FAL would consult with local groups. Consultation correspondence was issued to the address of Gailey Hub Ltd.
<ul style="list-style-type: none"> Neighbouring local authorities 	A list of local authorities to be consulted was included in the SoCC at paragraph 5.1.3.

Table 7: Comments from Staffordshire County Council on the draft SoCC

Staffordshire County Council comment	FAL response
The SoCC should list neighbouring local authorities to be consulted	A list of local authorities to be consulted was included in the SoCC at paragraph 5.1.3.

7.5. Publicity under section 47

7.5.1. The final SoCC which took account of the comments received from both local authorities was published on 21 June 2017. In accordance with section 47 of the Act, the SoCC was made

available on the project website, and for review at three local venues – Penkrige Library, Brewood Library and South Staffordshire District Council’s Offices at Codsall. A copy of the published SoCC can be found in Appendix K.

7.5.2. In order to publicise the SoCC and where it could be accessed, notices pursuant to section 47 of the Act were placed in three regional papers on 21 June 2017; the Birmingham Mail, the Express and Star and the Staffordshire Newsletter. Scans of the section 47 notice can be found at Appendix L.

7.5.3. The SoCC was displayed and was made available for viewing at the locations and on the dates and times listed below. These locations were contacted in advance to confirm and agree that the SoCC would be placed on public display and then on the day of publication to confirm its receipt and availability.

Table 8: Locations and times where SoCC was on display

Location	Address	Opening times
Brewood Library	Newport Street, Brewood, Stafford, ST19 9DT	Monday: Closed Tuesday: 9am-1pm and 2-7pm Wednesday to Friday: 9am-1pm and 2-5pm Saturday: 9.30am-1pm Sunday: Closed
Penkrige Library	Bellbrook, Stafford, ST19 5DL	Monday: 2-6pm Tuesday: 2-7pm Wednesday: 10am-1pm and 2-5pm Thursday: 2-5.30pm Friday: 10am-1pm and 2-5pm Saturday: 9.30am-1pm Sunday: Closed
South Staffordshire District Council	Wolverhampton Road, Codsall WV8 1PX	Monday to Friday: 8.45am-5pm Saturday: Closed Sunday: Closed

7.6. Adherence with the SoCC

7.6.1. The next Chapter of this Report details how the Stage 2 Consultation was undertaken in adherence with the SoCC.

8. Stage 2 Consultation under section 47

8.1. Introduction

8.1.1. Consultation was carried out fully in line with the published Statement of Community Consultation (SoCC). The table at Appendix M sets out a summary of the commitments made in the published SoCC and how these have been adhered to. Details of the activities undertaken as part of the consultation can be found in the preceding Chapter.

8.2. When did consultation take place

8.2.1. Consultation took place between Wednesday 5 July 2017 and Wednesday 30 August 2017, a period of 57 days.

8.3. Who was consulted

8.3.1. As required by section 47 of the Act, Four Ashes Limited (FAL) consulted people who live and work in the vicinity of the Proposed Development. In addition, various representatives, groups and organisations were contacted and invited to participate in the consultation to seek their views on the Proposed Development. The representatives, groups and organisations were:

- Elected representatives;
- Hard-to-reach groups;
- Statutory bodies (see Chapter 6 for more details);
- Other organisations;
- Landholders (see Chapter 6 for more details); and
- The wider public.

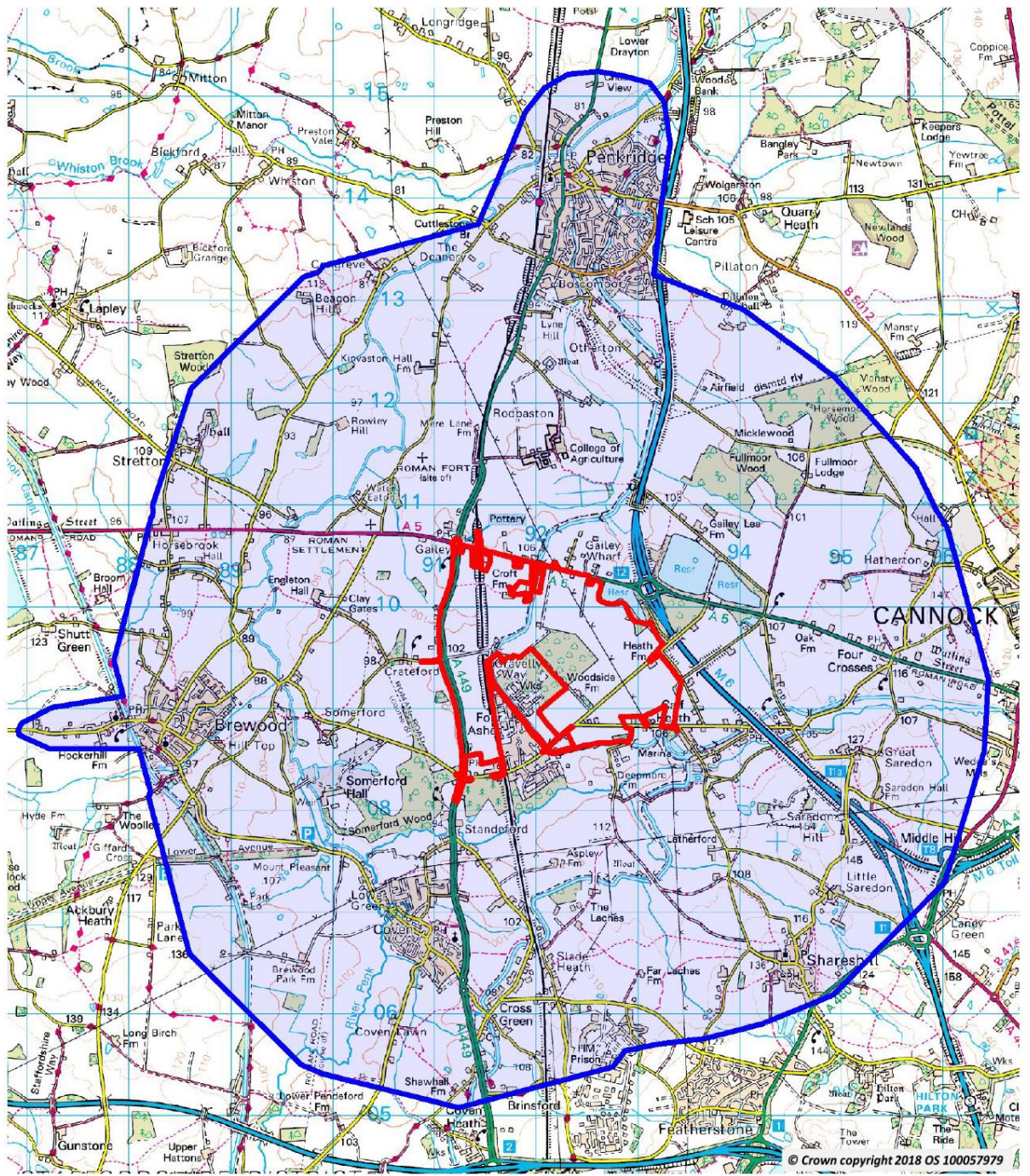
People who live and work in the vicinity of the Proposed Development

8.3.2. Residents and businesses located in the immediate area of the Site were contacted. This included all those living and working within an identified 'Consultation Zone'.

8.3.3. The Consultation Zone contained over 7,500 residential and business addresses taken from the Royal Mail Post Address File. In response to comments received as part of Stage 1 Consultation, the Zone was revised to incorporate Penkrige. This was agreed with South Staffordshire District Council officers through meetings. A plan showing the Consultation Zone can be found below. The red lines indicate the extent of the Strategic Rail

Freight Interchange (SRFI) Site at Stage 2 Consultation, and the blue line is the extent of the Consultation Zone:

Figure 7: Stage 2 Consultation - Consultation Zone



Elected representatives

8.3.4. Elected representatives whose constituents live or work within the Consultation Zone were contacted and asked to take part in the consultation. This included:

- Members of Parliament (MP); and
- Local ward councillors.

8.3.5. Details of the MPs and ward councillors contacted can be found in Appendix N.

Hard-to-reach groups

8.3.6. Hard-to-reach groups can be broadly defined as those that may have specific requirements to access consultation information in comparison to other local residents, or may be less likely to become involved in consultation in comparison to other local residents. It was on this basis that the hard-to-reach groups and organisations were identified for consultation.

8.3.7. In advance of the launch of consultation, the planned approach was shared with South Staffordshire District Council and Staffordshire County Council. The Councils provided input to the approach.

8.3.8. A total of 35 specific hard-to-reach groups were subsequently identified and invited to take part in consultation. A list of the hard-to-reach groups contacted can be found in Appendix M, Annex 5.

Statutory bodies, PILs and discretionary organisations

8.3.9. More details of the consultation with statutory bodies, Persons with an Interest in the Land (PILs) and discretionary organisations can be found in Chapter 6.

The wider public

8.3.10. Any member of the wider public was able to view information and provide feedback.

8.4. How consultation was carried out

Consultation documents

8.4.1. To enable everyone to have a clear understanding of the background to the Proposed Development and the way that feedback could be provided, the following documents were made available:

- Consultation Newsletter – providing an outline of the Proposed Development, details of public exhibitions, where information could be found and how to provide feedback.
- Feedback Form – a document to guide and collect feedback.

- Overview Document – providing a summary of the Proposed Development and its key elements.
- Interim Consultation Report – setting out the consultation carried out prior to the Stage 2 Consultation and how feedback had been considered in the development of the Proposed Development.
- Draft technical documents:
 - Draft Proposed Order (including requirements) and Explanatory Memorandum
 - Preliminary Environmental Information Report and Non-Technical Summary
 - Draft Planning Statement
 - Draft Alternative Sites Assessment
 - Draft Rail Report
 - Draft Market Assessment
 - Draft Design and Access Statement
 - Draft maps and drawings including the Illustrative Masterplan and Parameter Plans.

8.4.2. Copies of the Consultation Newsletter, Feedback Form, Overview Document and Interim Consultation Report can be found at Appendix H. Appendix H also contains links to the technical documents, maps, drawings and plans.

8.5. Making information available and consultation promotion

8.5.1. The following activities were undertaken to raise awareness and inform people about the consultation:

Website

8.5.2. All consultation documents were made available to download from the website: www.westmidlandsinterchange.co.uk.

Digital storage device

8.5.3. A USB containing digital copies of all the consultation was made available during the consultation free of charge.

Public exhibitions

8.5.4. Public exhibitions were held to give the public an opportunity to view information about the Proposed Development and speak with members of FAL's team, as well as to provide comments on the Proposed Development. The exhibitions were run as 'drop-in'

sessions, where attendees could turn up at any point within the advertised times.

Table 9: Stage 2 Consultation - public exhibitions

Location	Date	Time
Calf Heath Village Hall, Straight Mile, Calf Heath, Wolverhampton, WV10 7DW	Tuesday 11 July 2017	3pm to 8pm
Brewood Jubilee Hall, Bargate Street, Brewood, Staffordshire, ST19 9BB	Wednesday 12 July 2017	2pm to 7pm
The Haling Dene Centre, Cannock Road, Penkridge, Stafford, ST19 5DT	Thursday 20 July 2017	3pm to 8pm
Calf Heath Village Hall, Straight Mile, Calf Heath, Wolverhampton, WV10 7DW	Friday 21 July 2017	2pm to 7pm
Coven Memorial Hall, Brewood Road, Coven, WV9 5DL	Saturday 22 July 2017	10am to 2pm

8.5.5. These exhibitions were attended by approximately 830 people.

8.5.6. All consultation documents were made available in hard copy to view at the exhibitions. The Newsletter, Feedback Form, Overview Document and USB sticks were available for the public to take away.

Information Points

8.5.7. Copies of the Overview Document, Newsletter and Feedback Form were made available to review throughout the consultation period and take away at three local Information Points as set out below:

Figure 8: Information point locations

Location	Address	Opening times
Brewood Library	Newport Street, Brewood, Stafford, ST19 9DT	Monday: Closed Tuesday: 9am-1pm and 2-7pm Wednesday to Friday: 9am-1pm and 2-5pm Saturday: 9.30am-1pm Sunday: Closed
Penkridge Library	Bellbrook, Stafford, ST19 5DL	Monday: 2-6pm Tuesday: 2-7pm

		Wednesday: 10am-1pm and 2-5pm Thursday: 2-5.30pm Friday: 10am-1pm and 2-5pm Saturday: 9.30am-1pm Sunday: Closed
South Staffordshire District Council	Wolverhampton Road, Codsall WV8 1PX	Monday to Friday: 8.45am-5pm Saturday: Closed Sunday: Closed

8.5.8. The Information Points were checked throughout the consultation period to ensure the documents were available. When stocks were low, copies of documents were delivered to the venues.

Mailing to Consultation Zone addresses

8.5.9. A copy of the Newsletter and Feedback Form was sent by first class Royal Mail to residents and businesses within the Consultation Zone (see Appendix M, Annex 2 for a copy of the Consultation Zone mailing list).

Newspaper advertising

8.5.10. During the first week of consultation quarter page colour adverts were placed in the following newspapers:

- Express and Star: 5 July;
- Staffordshire Newsletter: 5 July;
- Birmingham Mail: 5 July; and
- Express and Star: 8 July.

8.5.11. This was done in addition to a notice placed under section 47 (6) (a) publicising the SoCC (as explained in section 7.2 above). A copy of the advert is contained in Appendix O.

Press releases

8.5.12. Press releases were issued to a number of regional print, online, broadcast, business and rail, freight and logistics industry media outlets to seek coverage at the start and end of the consultation. The release can be found at Appendix P. The outlets that were issued the release were as follows:

- Express and Star;
- Birmingham Mail;
- Birmingham Mail;
- Sunday Mercury;
- Birmingham Post;
- Shropshire Star;

- Staffordshire Newsletter;
- Lichfield Mercury;
- Cannock Chronicle;
- Wolverhampton Chronicle;
- Telford Journal;
- BBC Radio Stoke;
- BBC WM (radio);
- BBC Radio Shropshire;
- Shropshire Business Today;
- Stafford FM Community Radio;
- Touch FM;
- Big Centre TV;
- Windmill Radio;
- Free Radio;
- Signal (radio);
- Heart FM (West Mids);
- C & W In Business;
- ChamberLink;
- TheBusinessDesk.com (West Midlands);
- Midlands Business News Online;
- Birmingham Business Post;
- Freight Industry Times;
- Freight Business Journal;
- Freight & Logistics;
- Railnews UK;
- Railway Gazette International;
- Motor Transport;
- Logistics & Supply Chain;
- Rail;
- BIFALink;
- Bulk Distributor;
- Container Management;
- Hazardous Cargo Bulletin;
- Highways;
- Transportation Professional;
- Bulk Materials International;
- WorldCargo News;
- Logistics Manager;
- Solids & Bulk Handling;
- European Railway Review;
- Railway Strategies;
- Trucking;
- Steam Railway;
- Transport Times;
- International Railway Journal;
- Export and Freight;
- Eurotransport;
- Rail Professional;
- The Rail Engineer;
- Railnews;
- Local Transport Today;

- routeONE;
- Railway Interiors International;
- Rail Technology Magazine;
- Rail Business Intelligence;
- RailStaff;
- Logistics Business;
- iVT International;
- Rail Infrastructure;
- Cold Chain News;
- RMT News;
- Future Rail;
- Bunkerspot;
- FACTS;
- Trade International Digest;
- Freight Business Journal;
- Transport Operator;
- Commercial Vehicle Engineer;
- Truck and Track;
- Global Transport Finance;
- Metro Report International;
- Heavy Lift & Project Forwarding International;
- WorldECR;
- Transport Monthly;
- Intralogistics Magazine;
- Extralogistics Magazine;
- Inside ICHCA International;
- Dry Bulk;
- Railway Pro;
- Transport News;
- Fleet Magazine;
- Rail Construction News;
- Infrastructure Investor - infrastructureinvestor.com;
- Construction Global;
- Property and Development;
- Land Journal;
- Fractional Trade;
- Central & East Business Insider;
- Construction Journal;
- The Planner (UK);
- BAGMA Bulletin;
- Development Finance Today;
- Build;
- Construction News: Construction News – BIM;
- Review;
- FinanceWatch; and
- CapitalWatch.

Posters

8.5.13. Posters were placed in the local area at the following venues:

- Shareshill Parish Council noticeboard;
- Shareshill Shop and Post Office noticeboard;
- Shareshill Parish Council noticeboard next to Havergal C of E Primary School;
- Shareshill St Mary & Luke Church noticeboard;
- Penkridge Co-operative noticeboard in food store;
- Coven Parish of St Paul Church noticeboard;
- Wheaton Aston Village Hall noticeboard;
- Wheaton Aston Pharmacy shop window;
- Featherstone Parish Council noticeboard;
- Featherstone Community Centre noticeboard in car park; and
- Featherstone Express Lifestyle shop window.

8.5.14. A copy of the poster can be found at Appendix Q.

Hard-to-reach groups

8.5.15. In order that all hard-to-reach groups and individuals were aware of the consultation and able to take part, FAL undertook the following activities to encourage their involvement:

- All written information distributed to consultees was written in plain English;
- All meetings and public exhibitions were held at times and places convenient and accessible to as many people as possible;
- Posters publicising the consultation were displayed at appropriate public locations;
- Media releases about the consultation were issued to local and regional press;
- Advertisements were placed in local newspapers/publications;
- Information was sent directly to people's homes in the Consultation Zone;
- Hard copies of documents and information were made easily available at Information Points and public exhibitions;
- Although no requests were received, FAL was prepared to provide key information documents in alternative formats on

request. This included large print, Braille and alternative languages; and

- A translation service was available, although no requests for this were received.

8.5.16. At the start of public consultation, correspondence was sent to all 35 hard-to-reach groups who had been identified. The list of hard to reach groups can be found in Appendix M, Annex 5.

Feedback mechanisms

8.5.17. During consultation, feedback was invited through a range of channels:

- Online Feedback Form – could be completed on the website www.westmidlandsinterchange.co.uk;
- Email – feedback could be sent via contactus@communityrelations.co.uk; and
- Freepost – the Feedback Form, or any other feedback, could be posted to 'FREEPOST WMI'.

8.6. Conclusions

8.6.1. This Chapter demonstrates that the duties required under section 47 of the Act were carried out and that, subsequently, consultation was carried out in line with the SoCC.

9. Stage 2 Consultation: Publicity under section 48

9.1. Introduction

- 9.1.1. This Chapter of the report sets out how Four Ashes Limited (FAL) fulfilled the requirements to publicise the proposed application under section 48 of the Act.

9.2. Section 48 notice

- 9.2.1. Section 48 states:

Duty to publicise

(1)The Applicant must publicise the proposed application in the prescribed manner.

(2)Regulations made for the purposes of subsection (1) must, in particular, make provision for publicity under subsection (1) to include a deadline for receipt by the Applicant of responses to the publicity.

- 9.2.2. A copy of the published section 48 notice can be found in Appendix G.
- 9.2.3. Publicity under section 48 occurred in parallel to statutory consultation under sections 42 and 47 of the Act. The start of consultation and deadline for the receipt of comments on the application were consistent across sections 42, 47 and 48 consultation.
- 9.2.4. As explained above, FAL decided to use the same local newspapers for all publications in respect of the Application, for consistency.
- 9.2.5. As per the requirements of Regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) the section 48 notice was published for two consecutive weeks as follows in the table below:

Table 10: Details of the section 48 notices published

Regulation 4 requirement	Publication	Date
(b) once in a national newspaper	The Times (national)	5 July 2017
(c) once in the London Gazette	London Gazette (national)	5 July 2017
a) for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the Proposed Development would be situated	Birmingham Mail (regional)	5 July 2017
	The Express and Star (regional)	5 July 2017
	Staffordshire Newsletter (regional)	5 July 2017
	Birmingham Mail (regional)	12 July 2017
	The Express and Star (regional)	12 July 2017
	Staffordshire Newsletter (regional)	12 July 2017

9.2.6. Scans of the section 48 notice in the publications listed in the table above can be found at Appendix G.

9.2.7. A copy of the section 48 notice was issued to all consultees consulted pursuant to section 42.

9.3. Conclusions

9.3.1. This Chapter details how FAL complied with the statutory requirements in respect of section 48 of the Act.

10. Stage 2 Consultation – responses received under section 42

10.1. Introduction

- 10.1.1. This Chapter reports the responses to the Stage 2 consultation by statutory consultees, as well as Four Ashes Limited's (FAL) consideration of the issues raised in the responses.
- 10.1.2. Section 49(2) of the Act requires FAL to have regard to relevant responses to the consultation and publicity undertaken under sections 42, 47 and 48 of the Act. A relevant response for the purpose of section 42 is defined in section 49(3)(a) as a response from a person consulted under section 42 that is received by FAL before the deadline imposed. The deadline set for these purposes was 30 August 2017.
- 10.1.3. FAL acknowledges there is a clear expectation that issues raised during consultation should be considered in determining and shaping the final application. This Chapter demonstrates that FAL has acted reasonably in fulfilling its requirements under section 49 of the Act.
- 10.1.4. In total 32 responses to the statutory consultation were received from prescribed bodies including local authorities and parish councils.
- 10.1.5. In addition, 23 responses were received from persons with an interest in land.
- 10.1.6. All responses to section 42 consultation are reported on in this Chapter. Responses received under section 47 are considered in Chapter 11.

10.2. Overview of responses from prescribed bodies

10.2.1. Responses were received from 32 prescribed bodies:

- Birmingham City Council;
 - Brewood and Coven Parish Council;
 - Cadent Gas;
 - Canal and Rivers Trust;
 - Cannock Chase Council;
 - City of Wolverhampton Council;
 - Civil Aviation Authority (CAA);
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- Derbyshire County Council;
- Environment Agency;
- ES Pipelines (ESP) Utilities Group;
- Health and Safety Executive (HSE);
- Highways England;
- Historic England;
- High Speed Two (HS2);
- Joint Parish Council responses;
- Lichfield and Hatherton Canals Restoration Trust;
- Ministry of Defence (Defence Infrastructure Organisation);
- National Air Traffic Services (NATS);
- Natural England;
- Network Rail;
- Penkridge Parish Council;
- Public Health England;
- Royal Mail;
- Saredon Parish Council;
- Shropshire Council;
- South Staffordshire District Council;
- Staffordshire Borough Council;
- Staffordshire County Council;
- The Coal Authority;
- Transport for West Midlands (TfWM);
- Warwickshire County Council; and
- Western Power Distribution.

10.2.2. The section below is a summary of the principal issues raised by each consultee.

Birmingham City Council

10.2.3. The Council supports the Proposed Development in principle and the partnership approach that FAL has taken to addressing the wider transport implications of the Proposed Development.

10.2.4. Birmingham City Council broadly supports the views of TfWM – the transport arm of the West Midlands Combined Authority stating that it will help the regional economy by creating an

estimated 8,550 jobs. It reiterates the points made by TfWM in requesting that FAL participates in the regional network_resilience partnership; ensures rail network capacity is aligned with growth of traffic to and from the Strategic Rail Freight Interchange (SRFI) to maximise the benefits of a shift from road to rail for the benefit of the economy, environment and highway network; is aware of West Midlands policy and workstreams such as Movement for Growth and Midlands Connect; and promotes sustainable travel by working with local authorities and TfWM on bus development work plans.

Brewood and Coven Parish Council with Bishops Wood and Coven Heath

- 10.2.5. Brewood and Coven Parish Council raised several objections to the Proposed Development on the grounds of the loss of Green Belt, impact on local residents (cultural heritage and visual impact), the development resulting in further urbanisation in South Staffordshire, and that alternative SRFI Sites were not comprehensively investigated.
- 10.2.6. Other concerns relate to the ecology and nature conservation, air quality, noise and carbon emissions, socio-economic impact, the future transport network, length of consultation and the landscape and visual impact not having been fully explored and investigated appropriately.

Cadent Gas Limited (Cadent)

- 10.2.7. Cadent Gas Limited responded to the consultation to alert the team to its low and medium pressure pipelines in the development area.
- 10.2.8. Cadent made comment in respect of the existing Cadent infrastructure and highlighted that the required appropriate protection for retained apparatus would be needed, including compliance with relevant standards for works proposed within close proximity of its apparatus.
- 10.2.9. Cadent also highlighted several 'key considerations' regarding Deed of Grant of Easement in relation to pipeline crossings, new service crossings and general notes on pipeline safety, which Cadent asked to be referenced and considered as necessary.

Canal and River Trust

10.2.10. Canal and River Trust was unable to support the Proposed Development due to ongoing concerns regarding the visual and noise impact on character and amenity of the area. They also raised specific questions regarding the design of the bridges, and the impact on the towpath, reservoir, and canal water quality. As a landowner, they had questions regarding their land and property. They requested further information on all these issues before support could be given.

Cannock Chase Council

10.2.11. Cannock Chase Council stated that its position on the proposals was neutral, until such time that more information is available. It commented that it reserves its position to appear at any future Hearings.

10.2.12. The Council also asked several questions about the Proposed Development including: what are the implications for the proposed Pentolver, Mid Cannock road/rail interchange; what are the implications for the Churchbridge M6T/A5/A34/A460 junction and the traffic impact on the A5 through the District; what is the effect on air quality emissions; Bridgtown and Norton Canes Air Quality Management Areas (AQMA); Cannock Chase Special Area of Conservation (SAC) and Cannock Extension Canal SAC and whether there were any implications for additional HGV traffic.

10.2.13. It also questioned whether other occupants of the Proposed Development would be using the rail terminal, what controls would be put in place to enhance the canal-side environment and concerns over the assessment of alternative SRFI sites.

10.2.14. The Council did support the Proposed Development as part of a need for six road/rail freight interchanges in the northwest quadrant and welcomed the potential creation of an estimated 8,550 new jobs, a reduction in traffic congestion and how it would improve air quality and other environmental benefits.

City of Wolverhampton Council

10.2.15. The City of Wolverhampton Council welcomed the progress made with the Proposed Development and recognised the need for a development of this type and scale in this area. It also supported the potential for new employment, regeneration, additional public transport networks and growth in the City of Wolverhampton and wider area.

10.2.16. The Council did acknowledge that a development of this scale will result in a number of impacts including: loss of countryside; an increase in traffic; issues around proximity of residential properties and the generation of traffic.

Civil Aviation Authority

10.2.17. The CAA provided details of safety requirements for cranes and the implications for low flying aircraft. However, the CAA noted it is not necessary as no military low-flying aircraft routinely takes place in the Site location.

10.2.18. The CAA recommended that three aerodromes in the area be made aware of the Proposed Development. FAL has since provided information to each of the airfields (see under Aerodromes in Chapter 13).

10.2.19. It was also suggested that FAL is in contact with the Safeguarding Department within the Ministry of Defence's Defence Infrastructure Organisation (MOD DIO) to ensure that military aircraft safety is taken into consideration. FAL had already been in contact with the DIO (see under Ministry of Defence DIO below).

Derbyshire County Council

10.2.20. Derbyshire County Council responded to the consultation noting that given the location of the Proposed Development, which is relatively remote from Derbyshire, it is considered that the proposals would generate limited economic, environmental or social impact implications for Derbyshire.

10.2.21. The County Council did welcome the proposed benefits of better road access but did feel that it could not currently fully assess how the development will attract potential traffic from Derbyshire.

Environment Agency

10.2.22. The Environment Agency highlighted that its main concern with the Proposed Development was on the impact to the groundwater abstraction and remediation scheme. It highlighted that this was crucial to reducing the risk of the nearby Public Water Supply becoming contaminated by the pollution.

10.2.23. It also noted that of the two potential Options for the Proposed Development, the preferred plan would have the greatest potential impact on the ground water abstraction scheme. The Agency requested more information on the protection measures

that would be put in place, as without them in the final application, they would object to the Proposed Development.

ESP Utilities Group

- 10.2.24. The utilities firm ESP confirmed that it had no gas or electricity infrastructure on the Site and was not affected. Therefore, it does not object to the Proposed Development.
- 10.2.25. ESP does note that they are continually laying new gas and electricity networks and their notification is valid for 90 days from the date (5 July 2017). If the Proposed Development starts after this period of time, a new enquiry would need to be submitted.

Health and Safety Executive

- 10.2.26. The HSE raised concerns that the boundary of the Proposed Development falls within the Consultation Zones of a major accident hazard site. HSE noted that they would not advise against the Proposed Development, but if buildings are to be built as part of it, further consultation will need to be sought from the HSE.
- 10.2.27. The HSE also stated that while there are currently no pipelines within the Site, if prior to the granting of a Development Consent Order (DCO) for the Proposed Development there is notification of a Major Accident Pipeline within its vicinity, the HSE reserves the right to revise its advice.
- 10.2.28. It also asks whether a Hazardous Substance Consent (HSC) is needed, and if so, further information on HSC should be sought from the relevant Hazardous Substance Authority.

Highways England

- 10.2.29. Highways England responded to the consultation stating that they were pleased with how the Proposed Development would interact with their network, and that WMI would be a sustainable way of managing the need for long distance freight transport.
- 10.2.30. It did request that a list of outstanding matters was considered as part of the development process. These included:
- The creation of a new link road as a through route for traffic between the A5 and A449 trunk roads;
 - Further work to be completed on future traffic modelling;
 - Ongoing highways engineering designs which may impact the proposals;

- Request for more detail regarding provision for sustainable modes of transport;
- Further consultation on the proposed Framework Site Wide HGV Management Plan (**Document 6.2, Chapter 15, Appendix JI**);
- More details on construction (phasing/traffic); and
- Further detail on environmental and SRN boundary implications, including land drainage plans.

Historic England

10.2.31. In comments received from Historic England they note that following their assessment of the information provided, they are unclear on the proposed method of defining and achieving an overall mitigation strategy for the historic environment.

10.2.32. Therefore, Historic England requested greater clarity on these subject areas before the final proposals are submitted to the Planning Inspectorate.

High Speed Two

10.2.33. HS2 had no specific comments to make on the proposals from a safeguarding perspective.

10.2.34. For information only, HS2 highlighted that there is a proposed construction traffic route along the A51 Lea Hall Way, Staffordshire.

Joint Parish Councils

10.2.35. A consultation response was received as a joint response from 13 parish councils. These were:

- Hatherton Parish Council;
- Featherstone Parish Council;
- Cheslyn Hay Parish Council;
- Great Wyrley Parish Council;
- Essington Parish Council;
- Lapley, Stretton and Wheaton;
- Aston Parish Council;
- Penkridge Parish Council;
- Shareshill Parish Council;
- Saredon Parish Council;

- Hilton Parish Council;
- Huntington Parish Council; and
- Dunston with Coppenhall Parish Council.

10.2.36. The issues raised in the response were:

- Opposition to the Proposed Development, primarily because of the loss of Green Belt, positioning close to natural settlements and a lack of evidence that there are no appropriate alternative SRFI sites;
- Concern regarding the lack of an overnight parking facility, primarily for Heavy Goods Vehicle (HGV) drivers;
- Concern over an increase in traffic, accidents caused and the inability of the current local road network to deal with this;
- Concerns regarding negative impact on the connecting roads including: rat running; congestion; pollution; and compromising the safety of walkers, horse riders and cyclists;
- Lack of justification for the scale of the Proposed Development and the proposal to extend the Site across Vicarage Road towards the settlement of Calf Heath;
- Concern regarding the negative impact on an area of outstanding natural beauty, ecology and wildlife; and
- Issues surrounding the impact of increased traffic from the development.

Lichfield and Hatherton Canals Restoration Trust

10.2.37. The Trust raised several objections to the Proposed Development on the grounds of visibility of the development from the Calf Heath section of the Hatherton canal, the loss of Green Belt and the impact on traffic congestion and the environment.

Ministry of Defence, Defence Infrastructure Organisation (Safeguarding Department)

10.2.38. The Ministry of Defence, Defence Infrastructure Organisation Safeguarding Department stated that the Site is located outside of Ministry of Defence safeguarding areas and confirms it has no safeguarding objections to the Proposed Development.

NATS

10.2.39. NATS anticipates no impact from the Proposed Development. Accordingly, it had no comments to make.

Natural England

10.2.40. Natural England welcomed the second consultation on the Proposed Development, but continued to note that the Site is near the Cannock Chase Area of Outstanding Natural Beauty (AONB), Four Ashes Pit Site of Special Scientific Interest (SSSI) and Belvide Reservoir SSSI.

10.2.41. It also highlighted several issues including: landscape and visual impacts; the impact on designated nature conservation sites and soils; the potential impact of air pollution; and the need to accommodate protected species. It welcomed the comments on the final finish of the buildings and plans to prevent light pollution, but questioned the colour of the buildings and requested more detail on this.

Network Rail

10.2.42. Network Rail responded to the consultation with several issues that they would like considered. These were typical issues usually address as part of the Governance for Rail Investment Projects (GRIP) process – the process used to manage developments to enhance or renew Britain’s rail network. Issues included:

- Rights and access surrounding the development of new rail infrastructure;
- The need to look at timetable updates for the existing train network;
- Highlighting that the timetable study in 2011 required further updating;
- Noting that the utilisation of existing coal/steel paths was not an option unless the rights had expired or they have been given up by operators concerned;
- Requesting that track design to be reviewed by Network Rail;
- Identifying that the need for performance modelling for network change and for SOAR panel; and
- Requesting that FAL ensure the impact of the Proposed Development on existing network, plans and signalling is considered.

10.2.43. It should be noted that the response does not reflect concerns about the Proposed Development per se and indeed Network Rail wrote in support of WMI prior to the Stage 1 Consultation, stating:

"Network Rail is supportive of the West Midlands Interchange proposal and will be engaged with the Four Ashes team as it progresses through the normal process of rail technical investigation, planning and design."

Penkridge Parish Council

10.2.44. Penkridge Parish Council objected to the Proposed Development due to concerns about its need case, the validity of the Alternative Sites Assessment (**Document 7.2**), and that the location of a strategic rail freight interchange has not been included in the South Staffordshire Council's Site Allocation Document.

10.2.45. Penkridge Parish Council also raised concerns with the figures given on the effects of ecology, air quality, noise, pollution, and transport. Further concerns were raised over the Proposed Development's visual impact on communities and that consultants at events were unable to respond to their concerns.

Public Health England

10.2.46. Public Health England welcomed the second consultation highlighting that its original comments still stand but that it is satisfied with the general approach taken in the draft Environmental Statement.

10.2.47. Additional requests and recommendations were made for a specific section summarising potential public health impacts and more information on air quality. It also suggested the need for information on the risks and impacts that might arise as a result of electric and magnetic fields associated with the repositioning and undergrounding of the existing overhead electricity lines within the Site.

Royal Mail

10.2.48. The Royal Mail Group expressed concern regarding the potential impact of additional traffic. The Royal Mail Group requested a detailed transport impact assessment and to be consulted on any proposed road closures and diversions.

Saredon Parish Council

- 10.2.49. The Parish Council raised objections to the Proposed Development on the grounds of the impact on traffic, air and noise pollution, and the loss of Green Belt, landscape, ancient woodlands and the natural environment. Concerns were also expressed regarding HGV parking, the scale of the Proposed Development, the effect on local businesses and the economy, and that there was no guarantee that this would remain solely a rail freight hub.
- 10.2.50. It was also stated that not enough weighting had been made for alternative SRFI site locations, including in Stoke-on-Trent, and that considerations on housing for the additional workforce had not been made.

Shropshire Council

- 10.2.51. Shropshire Council welcomed the Proposed Development, expressing its support. The Council recognised the strategic significance of the Site location and saw it as important towards attracting further economic investment and employment in the area.

South Staffordshire District Council

- 10.2.52. South Staffordshire District Council objected to the Proposed Development due to the impact on Green Belt land, traffic problems including rat running, the quality of life for local residents, parking for HGVs, the length of build time, scale of the Proposed Development and its impact on local wildlife and how it will be managed.
- 10.2.53. It suggests the Proposed Development should be supported by an Economic Impact Analysis to support the anticipated business demand that it would bring.

Stafford Borough Council

- 10.2.54. In its response to the consultation, Stafford Borough Council raised concerns surrounding the number of jobs on offer and how these could have an impact on future employment growth in the neighbouring Stafford Borough. It notes that this could result in implications to the local economy.
- 10.2.55. The Council also highlights increased traffic as an issue but supports the location of the Site.

Staffordshire County Council

10.2.56. Staffordshire County Council raised a number of concerns following the second consultation. This included:

- That the justification for not going forward with alternative SRFI sites was unclear;
- Concerns over the quality of new jobs on offer and the need for a credible plan as to how the work force would be met from the local area;
- Whether 100% of the business rates generated by the Proposed Development would be retained locally;
- Visual impact and that sensitive building designs are used;
- Issues surrounding the parameters plans; and
- More information surrounding the impacts on public health such as air quality and noise.

10.2.57. The Council also expressed concern over the Transport Plan, highlighting traffic control measures, HGV parking, specific routes for employees, the need for sustainable public transport and requesting more information of the effect on the existing rail and road network.

10.2.58. It also noted its concerns surrounding the environment and ecology including: the impact on protected and priority species; compensation following the loss of biodiversity; and the impact on the water environment, soils, flood risk, historic environment, waste generation and air quality.

10.2.59. The Council also requested more information on the proposed Community Fund, further details on the planned Community Parks and when/how local people could see this information.

The Coal Authority

10.2.60. The Coal Authority reviewed the Proposed Development and the only comments made were to confirm that parts of the Site would fall outside the defined coalfield and part of it would fall within it. Whilst the parts of the Proposed Development that would be located within the defined coalfield, it would fall outside of the defined Development High Risk Area, meaning that there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability.

Transport for West Midlands

- 10.2.61. Transport for West Midlands responded by saying it supports the Proposed Development in principle, and considers the location as the best place for an SRFI in the West Midlands. It notes how the Proposed Development will help the regional economy and create a number of new employment opportunities for the area.
- 10.2.62. It also requests to be involved in discussions, as the Proposed Development evolves, and recommends several points for consideration. This includes:
- Joining the regional network resilience partnership to coordinate the best solution to transport plans;
 - Making sure the Proposed Development does not impact the current rail network and signalling requirements;
 - Awareness of the West Midlands Combined Authority policies and work streams; and
 - Supporting the shift towards sustainable transport modes.

Warwickshire County Council

- 10.2.63. Warwickshire County Council stated the comments and feedback it provided on 21 July 2016 during the Stage 1 Consultation still stand and it does not have any further comments to make on the Proposed Development.

Western Power Distribution

- 10.2.64. The utilities firm Western Power Distribution confirmed it is the electricity distributor and the operator of power lines and pylons within the Site.
- 10.2.65. It notes that it has various rights over the land required and has provided the approximate routes of the power lines covering the Site.

10.3. Regard to Prescribed Consultee responses

- 10.3.1. The following table includes a summary of the issues raised in feedback to consultation under section 42, confirmation of whether the issue led to a change in the Proposed Development, and details of FAL's consideration of the issue.
- 10.3.2. The 'Change?' column in the tables refers to whether or not the comment or issue summarised led to a change in the Application.

- 10.3.3. There is a slight variation to the suggested table contained in the Annex to the Planning Inspectorate's Advice Note Fourteen; the columns "Date consulted" and "Response deadline" have been removed to reduce repetition. This is because those dates are the same for all consultees. The "date consulted" is 5 July 2017 and the "response deadline" was 30 August 2017.
- 10.3.4. It is important to note that as with any analysis of text-based feedback, there is likely to be a difference of opinion on how certain elements are interpreted or summarised. In addition, to avoid duplication cells have been combined where the regard to responses is the same.

Table 11: Summary of Prescribed Consultee responses and consideration, by topic

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
Concern that the scale of the Proposed Development has not been adequately justified.	The issue of scale is addressed in detail in the Planning Statement (Document 7.1A, Section 5.4) . The Proposed Development is a direct response to the scale of the unmet need for rail-served warehousing in the north-west of the West Midlands. The proposals would be of sufficient scale to be attractive to the market and to secure the frequency of trains necessary to achieve a high quality rail-served centre for distribution. This would enable significant modal shift away from exclusively HGV-based distribution, which is characteristic of the area.	N
Comment that there is a lack of justification for extending the Site across Vicarage Road.	<p>As explained in the Planning Statement (Document 7.1A, Section 5.4), critical mass is important to support the operations of a modern SRFI (Strategic Rail Freight Interchange). The larger an SRFI is, the more effective and efficient the operations on site can become. The critical mass of an SRFI is also required to support viability and reliance on smaller RFI terminals is neither viable nor desirable. The National Policy Statement attaches importance to realising the full benefits of Nationally Significant Infrastructure Projects (NSIPs) and that calls to reduce the scale of a project should only be sanctioned in exceptional circumstances where a significant benefit would be derived with only a small reduction in scale or function. The proposed scale of development is a direct response to the scale of the unmet need for rail-served warehousing in the north-west of the West Midlands.</p> <p>The Proposed Development in Zone A7 (as shown on the Development Zone Parameter Plan (Document 2.5)) is critical to the overall proposal and reducing the size of the Proposed Development is not considered to be appropriate or feasible.</p>	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
Concern that need for the Proposed Development would be met by users from other SRFIs outside the West Midlands.	<p>A compelling need for an expanded network of SRFIs across the country is firmly established in the National Networks National Policy Statement (paragraph 2.40). The relevant regional evidence base also identifies a specific need for a new RLS / SRFI in the West Midlands region as far back as 2004. There are currently no new known, proposed or planned SRFIs in the West Midlands and the shortage of available warehouse floor space is only getting more severe.</p> <p>The 297 ha site area proposed at WMI will allow the delivery of a new intermodal rail terminal for the LEP (Local Enterprise Partnership) market area, responding to the severe scarcity of supply and with up to 743,200 sq m of rail-served warehousing. The market area is defined at section 5.3 of the Planning Statement (Document 7.1A). This proposal is a direct response to the scale of the unmet need for rail-served warehousing in the north-west of the West Midlands.</p>	N
Concern that users would be attracted to the Proposed Development (on Green Belt) from brownfield sites.	<p>The delivery of WMI is responding to a growth in demand for logistics floorspace, so will be absorbing new market demand rather than displacing existing demand or existing jobs. The scarcity of land and the resultant pent up demand suggests that WMI represents a major opportunity to provide a net addition to the economy.</p> <p>The Planning Statement (Document 7.1A, section 16.3) outlines that low levels of displacement of existing businesses and jobs (approximately 25%) is expected to occur at a Travel to Work Area and Stoke-on-Trent and Staffordshire LEP level. Some existing activity may be displaced but the majority of the increase in activity will be net additional to the area.</p>	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	Without WMI existing logistics operations are likely to leave the area in increasing numbers, as witnessed with DX Logistics at Essington. When lease renewals occur, firms located in the area may be forced to leave the region and go to locations where high quality logistics operations provide adequate land supplies.	

Topic: Site assessment		
Summary of responses	Regard to responses (section 49)	Change
Criticism that the Alternative Site Assessment is not comprehensive.	FAL has endeavoured to be as transparent and fair as possible when undertaking the Alternative Sites Assessment (Document 7.2). The method used in the assessment reflects the planning policy requirements and the specific operational and locational needs of an SRFI. The widest reasonable search area for alternative SRFI Sites was utilised and, at every opportunity, the Assessment adopted a comprehensive and inclusive methodology, including creating an extensive search area, setting a low SRFI Site size threshold of 60ha and considering SRFI Sites which are up to (and, in two cases, beyond) 5km from the strategic road and rail network. The analysis of the Site constraints and opportunities have been undertaken by professionals and the findings have been fully set out in the Assessment. The Assessment has demonstrated that, even when utilising a search methodology which goes beyond what an operator would normally consider reasonable, there are still no suitable alternative locations to the Site.	N
Comment that the Site is not allocated in South Staffordshire District	The South Staffordshire District Council Site Allocations Document at paragraph 9.33 states:	N

Topic: Site assessment		
Summary of responses	Regard to responses (section 49)	Change
Council's Site Allocation Document.	"It is recognised that the issue of an RLS/SRFI remains outstanding. However, it is also recognised that an RLS would require a scale of development beyond a 'modest extension' and therefore seeking to resolve this issue in the SAD would be contrary to the adopted Core Strategy, and therefore will be considered in the Local Plan Review."	
Suggestion for an alternative SRFI Site: Stoke-on-Trent	A SRFI Site within Stoke-on-Trent would serve a different catchment area and would not meet the demands of the Wolverhampton/Birmingham conurbation or needs of the distribution industry in the Black Country and southern Staffordshire.	N
Suggestion for an alternative SRFI Site: Telford, Hortonwood – an existing SRFI Site with space and plans to expand.	A search area was created as part of the Alternative Sites Assessment (Document 7.2) , within which a need exists for a SRFI and it is appropriate to search for SRFI sites that could potentially meet that need. The Site in Telford does not form part of the search area, because it would not meet the demands or needs of the distribution industry in the Black Country and southern Staffordshire. In any event the gauge restriction on the rail line to Telford prevents it from becoming an effective SRFI.	N
Comment that brownfield Sites should have been included in Alternative Site Assessment.	The Alternative Sites Assessment (Document 7.2) considers all SRFI Sites and possible locations for a Strategic Rail Freight Interchange, exploring the extent to which alternative SRFI sites could meet the need which has been identified. The Alternative Sites Assessment (Document 7.2) explores amongst other things whether or not this identified need can be met without the use of Green Belt land and on brownfield land. It is clear from the Assessment that the key criteria for an SRFI facility, principally the need to efficiently link to both the national road and rail networks, greatly restricts the SRFI development opportunities within the search area. Whilst theoretical locations for SRFIs have been identified, it is clear that, apart from WMI, there are no brownfield Sites	N

Topic: Site assessment		
Summary of responses	Regard to responses (section 49)	Change
	within the search area which represent genuinely suitable locations for an SRFI development.	

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
Concern that the special circumstances needed to develop in the Green Belt has not been demonstrated.	The Site lies within Green Belt land and there is, therefore, a requirement to demonstrate that very special circumstances exist to justify inappropriate development. As set out in the Planning Statement (Document 7.1A, Section 6) , very special circumstances are considered to exist and the absence of alternative SRFI Sites in the search area mean that national policy objectives clearly expressed in the NPS to meet the compelling need for a network of large scale strategic rail freight interchanges will not be met unless Green Belt development is permitted in principle. In this context, the NPS recognises that, due to the geographic requirements of SRFIs, promoters may find that the only viable SRFI Sites for meeting the need for regional SRFIs are on Green Belt land (paragraph 5.172).	N
Concern about where additional workforce will be housed and how this might affect the Green Belt.	We have undertaken a detailed assessment of existing travel to work patterns (both by sector and by regional characteristics). We have also looked at skill levels and qualifications within a reasonable travelling distance. This evidence demonstrates that the catchment of potential employees is substantial and adequate to provide a labour supply for the Proposed Development without any significant migration. Travel Plans will further support the sustainable commuting of employees from this catchment. For more details see the Employment effects during operation section of in the Socio-Economic Chapter of the Environmental Statement (Document 6.2, Chapter 14) .	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
Specific errors and omissions in the Draft Environmental Statement.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. Errors and omissions noted by consultees have been picked up in the development of the final submission documents.	N
Comment that the whole canal corridor should be considered as a sensitive receptor in the Environmental Statement.	The whole Canal corridor is considered a sensitive receptor in the Built Heritage Chapter of the Environmental Statement (Document 6.2, Chapter 9) because of the Staffordshire and Worcestershire Canal Conservation Area designation. The heritage assessment covers the whole of the canal and treats the section within the Site boundary as a part of that whole.	N
Comment that the final Environmental Statement was not available at consultation so it was not possible to comment on proposals in detail.	The purpose of the draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing, this was clearly indicated within the draft and is addressed in the submitted Environmental Statement (Document 6.2) that accompanies the DCO application.	N
Concern that the Draft Environmental Statement did not cover the whole Proposed Development so additional contamination	The final Environmental Statement will be updated to reflect any changes in the design and Order Limits of the Proposed Development. The potential effects of the Proposed Development relating to ground contamination are assessed in the Ground Conditions chapter of the Environmental Statement (Document 6.2, Chapter 11) . It is noted that the	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
may be present but has yet to be identified.	assessment area did not previously include the south-eastern land parcel (area extending south of Station Road to – and parallel along – the Staffordshire and Worcestershire Canal to Woodlands Lane and Stable Lane) in the draft Environmental Statement. Subsequent investigation of the south-eastern land parcel has now been undertaken, as reported in the factual report to be included as Technical Appendix 11.4 (Document 6.2) .	
Comment that any hazardous substances stored on the Site will need consent.	Any hazardous substances stored on the Site will be subject to obtaining the appropriate consents as necessary prior to being stored.	N
Comment that if works are proposed within the safeguarding distance for the licensed explosive Site at Gailey, the HSE should be consulted.	The licensed explosive Site at Gailey will be decommissioned and removed as part of the Proposed Development (in accordance with HSE guidance). Hence, this site will not comprise a constraint on proposed operations.	N
Comment that impacts on sensitive receptors such as schools, nursing homes and healthcare facilities should be included in the Environmental Statement.	The Socio-Economics chapter of the Environmental Statement (Document 6.2, Chapter 14) considers the impact of the development on a variety of receptors, including all existing local residents and employees who may be affected by amenity and health effects.	N
Request for a health impact assessment.	The Socio-Economics chapter of the Environmental Statement (Document 6.2, Chapter 14) also considers the impact of the development on human health.	N

Topic: Agriculture and soils		
Summary of responses	Regard to responses (section 49)	Change
Concern about the potential loss of Best and Most Versatile (BMV) agricultural land.	<p>The NPS requires Applicants to “take into account the economic and other benefits of the best and most versatile agricultural land” and to “seek to use areas of poorer quality land in preference to that of higher quality.”</p> <p>The Site consists of grassland and arable land, with some woodland, with around 59% of the Site categorised as between Grade 2 (Very Good) and Grade 3a (Good) agricultural land (see the Planning Statement (Document Ref 7.1A, Section 7.3) for further details). There is no Grade 1 (Excellent) agricultural land at the Site.</p> <p>The presence of Grade 2 and Grade 3 agricultural land at the Site is to be expected, as these grades of agricultural land are widespread in the district and the Alternative Sites Assessment (Document 7.2) has confirmed that there are no alternative SRFI Sites which could meet the need for a SRFI.</p> <p>Appropriate brownfield land is not available and the Site’s location and nature means that the permanent loss of agricultural land is inevitable. The significant benefits that would arise as a result of the Proposed Development outweigh the impacts of the loss of a not uncommon resource in this location and would not be expected to impact on food security.</p>	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on air quality and carbon emissions of the Proposed Development	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
has been provided at consultation.	clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. More details on Air Quality can be found in the submitted Environmental Statement (Document 6.2, Chapter 7).	
Comment that the air quality assessment should consider impacts on wildlife sites.	<p>Chapter 10: Ecology and Nature Conservation of the Environmental Statement (Document 6.2, Chapter 10) provides a comprehensive assessment of the potential air quality effects of the Proposed Development on all identified ecological receptors including designated sites, habitats and species. Designated sites within 200m of an affected road were surveyed to establish the habitats present and whether those habitats present is likely to be sensitive to air quality changes.</p> <p>In addition, potential effects on European Designated Sites, including Cannock Chase Special Area of Conservation (SAC), are considered in a Habitat Regulations Assessment (HRA) No Significant Effects Report (NSER). No significant effects are identified either in the Environmental Statement or the NSER on habitats, including Cannock Extension Canal SAC, including from air quality. Further information in relation to effects on ecological receptors are included in Chapter 7: Air Quality (Document 6.2, Chapter 7).</p>	N
Comment that the air quality assessment should consider impacts on the Cannock Extension Canal SAC.	The Ecology and Nature Conservation chapter of the Environmental Statement (Document 6.2, Chapter 10) provides a comprehensive assessment of the potential effects of the Proposed Development on all identified ecological receptors including designated sites, habitats and species. the Air Quality chapter (Document 6.2, Chapter 7).	
Comment that typical start-up, operation, shut-	The Air Quality chapter of the submitted Environmental Statement (Document 6.2, Chapter 7) includes a detailed air quality assessment which	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
down, abnormal and accidental emissions should be included in the air quality assessment.	considers car and HGV movements associated with the Proposed Development. The operational impacts of increased traffic emissions arising as a result of additional traffic movements on the surrounding road network have been assessed using the latest emissions data issued by Department for the Environment, Food and Rural Affairs (DEFRA). The nature of proposed operations (rail and warehousing) do not comprise atypical conditions (i.e. start up, operation, shut down, abnormal and accidental emissions) and hence air quality modelling has used approved guidance in assessing emissions from road and rail operations.	
Comment that pollution from HGVs should be included in the air quality assessment.	HGVs are included in the assessment of air quality. See the Environmental Statement (Document 6.2, Chapter 7) for more details for more details of the air quality assessment undertaken.	N

Topic: Heritage		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on the cultural heritage impact of the Proposed Development has been provided at consultation.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. More details on Heritage can be found in the submitted Environmental Statement (Document 6.2, Chapter 9).	N
Concern that the Proposed Development would affect	The Built Heritage assessment of the Environmental Statement (Document 6.2, Chapter 9) has identified all the listed structures within a 1km radius of the	N

Topic: Heritage		
Summary of responses	Regard to responses (section 49)	Change
the character and listed structures of the area.	<p>Application Site and highly graded listed buildings up to 3km from the Site. The effect of the Proposed Development on these heritage assets has been considered in line with the heritage methodology presented in the Environmental Statement and best practice.</p> <p>The listed structures closest to the Site boundary are the two Grade II listed buildings at Gailey Marina. The fabric of these buildings will not be affected by the proposals. The Proposed Development will fall within the setting of the listed buildings, but it will not affect an ability to appreciate their special interest which is defined by their historical and architectural character and relationship to the canal. The distance to the development and screening which is proposed has been incorporated into the design of the scheme to mitigate any effects on listed structures.</p>	
Request for clarity on the method for defining and achieving an overall mitigation strategy for the historic environment.	The mitigation strategy for the historic environment has been considered throughout the design development process. The heritage sensitivities of the Site have informed the position of buildings/zoning and have been a key part of the landscape proposals. The wider opportunities to preserve and enhance the historic environment have also been identified through consultation with Historic England and the Canal and Rivers Trust (CRT). The mitigation strategy has been achieved by detailed analysis of the historic environment by heritage and archaeological professionals and their consequent advice to the team. The historic environment professionals have worked closely with the masterplanners and landscape consultants to achieve a satisfactory outcome for the historic environment.	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on the ecology and nature conservation impact of the Proposed Development has been provided at consultation.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. More details on Ecology and Nature Conservation can be found in the submitted Environmental Statement (Document 6.2, Chapter 10).	N
Concern about the loss of woodland as part of the Proposed Development, and request that this should be mitigated.	The Proposed Development has been specifically designed to conserve existing woodland, trees and hedgerows where possible, including Calf Heath Wood. In addition, it is proposed to provide extensive new woodland, trees, hedgerows and other habitats including some semi mature and larger trees and planting stock. All of the conserved and new planting and habitats will be the subject of a comprehensive management and maintenance regime. All of the planting proposals will begin to mature once planted and will increasingly and positively contribute to the environment of the Proposed Development from the outset. More details on Ecology and Nature Conservation can be found in the submitted Environmental Statement (Document 6.2, Chapter 10).	N
Comment that ecological mitigation and enhancement was not included at consultation or that the Green Infrastructure Plan was not developed enough.	<p>The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals.</p> <p>Since consultation we have continued to develop the proposals and have now included a comprehensive Green Infrastructure Plan in the submitted documents (Document 2.7).</p>	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
Comment that no details to manage increased visitor pressure and impacts to bats and otters during operational phase.	The Ecology and Nature Conservation chapter of the Environmental Statement (Document 6.2, Chapter 10) provides a comprehensive assessment of the potential effects of the Proposed Development on all identified ecological receptors including designated sites, habitats and species. The assessment methodology, outcomes and mitigation have been agreed in consultation with stakeholders and regulatory bodies including Natural England, Staffordshire County Council, the Canal and Rivers Trust and Staffordshire Wildlife Trust. The Ecology chapter benefits from a comprehensive set of surveys and desk study data carried out and obtained for the purposes of the Environmental Statement (Document 6.2, Chapter 10).	N
Concern that no new habitats will be created until the final stage of development and comments on the detailed phasing of the ecological mitigation.	Extensive consideration of the effects on wildlife habitats is included in the Environmental Statement (Document 6.2) including a full suite of habitat / species surveys. In response to feedback at consultation the indicative phasing of the Proposed Development has been amended to mitigate loss of habitat by bringing forward elements of the Green Infrastructure Parameter Plan (Document 2.7) earlier in the delivery phases. In addition, in response to comments further detail regarding ecological enhancement and mitigation are included in the Environmental Statement (Document 6.2: Chapter 10).	Y
Concern that the Proposed Development would sterilise the Site as a source of minerals, contrary to planning policy.	The Proposed Development will not extract the remaining mineral resource. The mineral resource contained within the Site is not considered important or significant in the context of the Minerals Local Plan and the 'loss' of the minerals in the Minerals Local Plan period is not considered significant in the context of the benefits of the Proposed Development. In addition, further mineral extraction would affect the cut and fill balance for construction and also push the development platform into the watertable.	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
	The material benefits of the Proposed Development far outweigh the material planning benefits of the underlying mineral. The Proposed Development is therefore in compliance with national and regional policy regarding mineral resources. See Section 7.2 of the Planning Statement (Document 7.1A) for more details.	

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on the landscape and visual impact of the Proposed Development has been provided at consultation.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. More details on Landscape and Visual can be found in Chapter 12 of the submitted Environmental Statement (Document 6.2).	N
Concern about the landscape and visual impact of the Proposed Development.	The potential visual effects of the Proposed Development have been an important consideration in designing the scheme and have been assessed. There will inevitably be some significant visual effects. However, these have been mitigated and minimised through the design process and attention to the proposed mounding and planting. Substantial landscape areas and 'buffers' are also included as part of the scheme to mitigate the effects. More details can be found in the Environmental Statement (Document 6.2, Chapter 12)	Y
Concern about the visual impact of the Proposed Development on the canal.	The visual effect of the Proposed Development upon users of the canal is considered within the Environmental Statement (Document 6.2, Chapter 12, Visual Receptor P1). The scheme will be visible to varying extents from	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
	relatively short stretches of the canal. The inclusion of extensive landscape areas and planting (conserved and proposed), including mounding between the canal and the proposed units will mitigate and minimise the resultant visual effects.	
Concern about the loss of Ancient Woodland on landscape.	No ancient woodland is to be lost as a result of the Proposed Development.	N
Concern about the impact of the Proposed Development on the rural local character.	The Site is surrounded and intersected by a number of urban and industrial influences, including the A449, the A5, the M6, the WCML, the Staffordshire and Worcestershire Canal, Calf Heath Reservoir, the Four Ashes Industrial Estate, the SI Group Chemical Plant and the Calf Heath Quarry.	N
Request for further explanation about how the Proposed Development would produce a sense of urban industrial containment.	<p>Also adjacent to the Site boundary is the Veolia Energy Recovery Facility, the Severn Trent Sludge Disposal Centre and the Bericote industrial and distribution site (currently partly let to Gestamp, suppliers to JLR), with the Rodbaston Wind Farm approximately 1km to the north.</p> <p>The Order Limits proposed for the Proposed Development fall within this heavily urbanised and industrialised area, with a strong landscape and green infrastructure strategy proposed as part of the scheme to ensure that the impact of the Site on the surrounding landscape will be minimised.</p> <p>The majority of the countryside surrounding the Proposed Development Site lies within the Green Belt, and therefore no further development will come forward on the land surrounding the Site unless very special circumstances are demonstrated to exist to justify inappropriate development.</p>	

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
Comment that there is insufficient screening proposed.	The effect of the Proposed Development upon the character and appearance of the landscape is detailed within the Environmental Statement (Document 6.2, Chapter 12). This does recognise that there will be some significant effects but also how measures have been incorporated to mitigate and minimise their effects as far as practicable. The Proposed Development will include approximately one third of the site dedicated for landscape/green end uses and these areas will help to limit the extent of the effects on the local and wider area. In addition, in response to this comment FAL has extended the Calf Heath Community Park and green corridors within the site to allow for additional screening to be included. The extension of Calf Heath Community Park was subsequently part of the Stage 2a Consultation.	Y
Concern about the impact of the Proposed Development on the setting and integrity of Cannock Chase Area of Outstanding Natural Beauty (AONB) and Shoal Hill Common (part of the AONB).	The effects of the Proposed Development upon the landscape and the Area of Outstanding Natural Beauty have been undertaken in accordance with best practice. In relation to the AONB this lies approximately 3km to the east of the Site. Potential view towards the Proposed Development from the AONB will be limited to a very small part of the designated landscape at its south western extent. This will include Shoal Hill. The effects of the Proposed Development upon the AONB and the special qualities of this landscape and upon users of the AONB (including Shoal Hill) are detailed in Environmental Statement (Document 6.2, Chapter 12). A photomontage depicting the view of the Proposed Development from Shoal Hill is included at Figure 12.13 (Viewpoint 32). Careful attention has been paid to the effects of the Proposed Development upon this landscape.	N
Concern about the visual impact of the Proposed Development on the Cleve Hills in Shropshire.	The Cleve Hills lie approximately 35 – 45km to the south west of the Site. No material visual effects have been identified for visual receptors within the Cleve Hills.	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
Comment that the photomontages provided at consultation did not accurately portray the effectiveness of the colour scheme proposed.	Photomontages are useful tools to help consultees obtain an impression of the proposals; they are not intended as a tool by which to assess the visual impact of the proposals. The assessment of visual impact is based on SRFI Site survey work, and the photomontages, whilst illustrative in nature, provide evidence in a user-friendly manner to support the judgements made in the assessment.	N
Request for more detail about colour and finish in the submitted documents.	The approach to the colour and finish of the buildings is considered in the Design and Access Statement (Document 7.5) submitted with the DCO application.	N
Request for further explanation about how the Landscape Character Types (LCTs) and Landscape Character Parcels (LCPs) contribute to the setting of the Cannock Chase AONB.	<p>The LCTs and LCPs as identified respectively within the Staffordshire County and South Staffordshire District Landscape studies contribute to varying degrees to the setting of the Cannock Chase AONB. The location and extents of the LCTs and LCPs in relation to the Site and the AONB can be seen from the Environmental Statement (Document 6.2, Chapter 12) Figures 12.1 – 12.3. In general, those LCTs closest to the AONB contribute relatively more to its setting. The <i>Settled Heathlands</i> LCT (see Document 6.2, Chapter 12, Figure 12.1) stretches across the landscape, largely alongside the south western edge of the AONB and is that LCT most relevant to the Site and the setting of the AONB. This LCT is characterised by woodland and woodland edges; flat landform; straight roads; canal; relic heathland; well-defined hedgerows and numerous hedgerow trees.</p> <p>The LCPs are much smaller landscape parcels that have been defined as part of a landscape sensitivity study of land for employment at and around Four Ashes.</p>	N
Request for a bespoke map which clearly illustrates how the development	This is shown on Document 6.2, Chapter 12, Figures 12.1 and 12.2 .	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
relates to both county and district level LCTs and LCPs.		
Request for more detail on the visual and landscape impact on LCT Sandstone Hills and Heaths.	The landscape effect of the Proposed Development on the Sandstone Hills and Heaths LCT would be Negligible/Minor Adverse (upon completion) as detailed in the Landscape Effects table (Document 6.2, Appendix 12.5). This LCT lies approximately 3.5km to the north east of the Site and stretches further to the north east away from the Site and across parts of the AONB.	N
Request for further explanation of how change during the construction phases will be assessed for landscape and visual effects.	Additional detail on the changes to the landscape and visual effects during the construction period has been included in the final Environmental Statement (Document 6.2, Chapter 12). This includes descriptions as to how the effects will vary throughout this period.	N
Suggestion: use the 5 metre grid for the ZTV model.	A 5 metre grid has been used to model the Bare Earth; with the data then thinned using a vertical tolerance of 0.2m and horizontal spacing of 50m to reduce the number of points in the data set to a suitable level for modelling. This reflects common and good practice and does not prejudice the results of the ZTV.	N
Suggestion: the emphasis should be on-site screening vegetation and other features within the development area or FAL's control.	The nature and design of the landscape proposals and mitigation measures have been carefully considered during the evolution of the Proposed Development. This has included close attention to on site visual screening through the use of mounding and suitable planting. Further attention has focussed on the positioning and layout of the built development areas and the heights of the units. The overall approach has thus sought to limit the likely visual effects as far as practicable through specific on site measures, yet also attention to the relevant layout and building height parameters.	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
Concern that the assessment of receptor P7 PROW is not complete in terms of scale or size of degree of change.	Visual Receptor P7 (PROW) comprises the PROW/ public open space at Shoal Hill (Cannock Chase AONB). The assessed Size/Scale of Visual Effect (including the degree of contrast/ integration) at the different stages of the Proposed Development are included within the visual effects table (Document 6.2, Appendix 12.6).	N
Request that lighting is directed down and away from the canal corridor and other sensitive receptors to protect biodiversity.	The Lighting Strategy submitted with the DCO application shows that the dark corridor of canal will be retained (Document 6.2, Technical Appendix 12.8).	N
Request that night time photomontages are required to show light spillage.	Lighting will be directional (away from the canal), and it is therefore intended that there is no light spill. The canal will be maintained as a dark corridor.	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on the noise impact of the Proposed Development has been provided at consultation.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing, this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. More details can be found in the Noise and Vibration chapter of the submitted Environmental Statement (Document 6.2, Chapter 13).	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
Concern that the noise and vibration assessment does not cover the canal corridor or Calf Heath Reservoir.	Noise has been modelled for the Canal and at Calf Heath Reservoir. This is covered in the Noise and Vibration chapter of the submitted Environmental Statement (Document 6.2, Chapter 13).	N
Request for clarity on the effectiveness of landscape bunds as acoustic mitigation.	<p>For sound attenuation through a structure such as an acoustic barrier to be considered negligible, it is generally considered that the barrier's surface density should be around 15kg/sq.m. A solid structure such as a landscaped earth bund will achieve this.</p> <p>If sound transmission through the barrier is considered negligible, the effectiveness of the barrier is then determined by its height and length, and by its relative distances from a noise source and receptor point. Landscaped bunds have been included in the noise calculations undertaken for the Site, based on the locations and heights set out in the proposed site drawings. The results of the noise calculations are set out in the Noise and Vibration chapter of the Environmental Statement (Document 6.2, Chapter 13).</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on the socio economic impact of the Proposed Development has been provided at consultation.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	More details on Socio-Economics can be found in the submitted Environmental Statement (Document 6.2, Chapter 14).	
Concern that the Proposed Development would impact on the attractiveness of the canal as a leisure facility.	<p>Effects of the development on amenity have been assessed in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14) under the "Recreation and Amenity" sections under both construction and operational effects assessments.</p> <p>Amenity assessments relate to quality of life, considering how potential effects of the development such as noise or traffic could impact on the usefulness or desirability of living in, working in or visiting the local area for recreation or leisure, including rambling.</p>	N
Concern that the Proposed Development would impact on nearby businesses and concern about business rate calculations.	<p>At a local level displacement of value in other sectors is likely to be negligible: WMI will provide a relatively unique offer in the local context and will not result in a reduction in economic activity elsewhere in the local area or South Staffordshire. "Low" levels of displacement (approximately 25%) are expected to occur at regional level: Some existing activity may be displaced but the majority of the increase in economic activity is expected to be net additional to the area.</p> <p>Activity at WMI will generate an additional £427m in Gross Value Added (GVA), each year when fully operational. This would result in direct and indirect additional GVA effects via the supply chain totalling £912m. Taking into account displacement, this would be £684 annually when fully operational.</p> <p>On full occupation, FAL's tenants would pay an estimated £16.2m in business rates every year, which, under new Business Rates Retention policies, will be retained locally in South Staffordshire District Council and Staffordshire County Council. Business Rates are a key component in funding Council's planning and</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	<p>service delivery priorities. Business Rates retention means that growth in locally generated business rates is more important than ever in supporting Council's activities.</p> <p>More details can be found in the Statement of Economic Benefits (Document 7.1B).</p>	
Comment that the number of jobs to be created is not supported.	A SRFI of this scale and quality would be capable of supporting an estimated 8,550 jobs directly. Jobs would be accessible in terms of skills and qualifications to employees within the travel catchment. Details are set out in the Statement of Economic Benefits (Document 7.1B). An Employment, Skills and Training Plan Framework will be established with local stakeholders.	N
Concern that additional jobs would impact on the local transport network.	<p>Employee distribution is set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 6). Whilst it is expected that 18% of employees are expected to come from the local South Staffordshire area, employees would come from neighbouring authorities including Wolverhampton, Walsall and Stafford. To promote sustainable travel to work patterns from these areas, measures are set out in the Site Wide Travel Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix H) / the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G).</p> <p>These include proposals to introduce employee shuttle buses and improvements to the existing public bus services to the Site. This could potentially include an additional two new buses and an improved service frequency between Wolverhampton City Centre and WMI, enhancing the existing Service 54 to provide a half hourly service when required between Wolverhampton and the Site. This suggested service pattern reflects the most significant demand from the estimated location of employees; should demand or aspirations of the operator or other Stakeholders be to improve the service frequency between</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	WMI, Penkridge, Stafford or any other destination, the proposals do not preclude this from being implemented in the future. As part of the annual travel plan monitoring demand for bus patronage for WMI will be reassessed.	
Concern that the Proposed Development would impact on the use and operation of Gailey Marina.	With mitigation measures in place, the Proposed Development would not impact on the use and operation of Gailey Marina.	N
Concern that the Proposed Development would impact on residential amenity.	Effects of the development on amenity have been assessed in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14) under the "Recreation and Amenity" sections under both construction and operational effects assessments. Amenity assessments relate to quality of life, considering how potential effects of the development such as noise or traffic could impact on the usefulness or desirability of living in, working in or visiting the local area.	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
Comment that not enough information on transport impact of the Proposed Development has been provided at consultation.	The purpose of the Draft Environmental Statement presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing, this was clearly indicated within the Draft Environmental Statement and is addressed in the submitted Environmental Statement that accompanies the DCO application. More details on Transport and Access can be found in submitted Environmental Statement (Document 6.2, Chapter 15).	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
Concern that the existing road network is already congested and that the Proposed Development would make this worse.	A comprehensive traffic model has been developed and agreed with the highways authorities (Highways England and Staffordshire County Council). The model covers current levels of traffic and predicted levels of traffic during construction and operation of the Proposed Development. A Transport Assessment (Document 6.2, Technical Appendix 15.01) has been undertaken and submitted as part of the DCO. This demonstrates that with the introduction of mitigation measures proposed, the highway network can accommodate the additional traffic associated with the Proposed Development.	N
Concern that the Proposed Development would increase rat-running in local villages.	<p>The Transport Assessment demonstrates that with the introduction of mitigation measures proposed the highway network can accommodate the additional traffic associated with the Proposed Development. In addition, the Proposed Development would be accurately signed within the strategic road network to discourage the use of local roads to access the Site. It is therefore not anticipated that rat-running would occur.</p> <p>Notwithstanding this, FAL is proposing to provide a Contingent Traffic Management Fund. This Fund could be available to be spent on implementing local traffic measures spent if they are considered necessary by Staffordshire County Council. Details of the Fund can be found in the Transport Assessment (Document 6.2, Technical Appendix 15.01).</p>	Y
Concern that vehicles from the Proposed Development would park on local roads or laybys, linked to access to the Site and lack of parking and overnight	All car and HGV parking will be accommodated on the Site. Parking will be provided at each individual plot; the ratios provided can be found within the Design and Access Statement (Document 7.5). In addition, HGVs accessing the Proposed Development will have to be pre-booked and will be allocated an arrival time. To ensure they do not wait on the adjacent road network, early arrival bays with driver welfare facilities will be located at each warehouse.	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
accommodation within the SRFI Site.	Details of the arrival process are set out in the Site Wide HGV Management Plan (Document 6.2, Chapter 15, Appendix I).	
Request for clarification of clarification for new roads proposed and justification as to whether the new spine road cannot remain as a private road with no through access.	It is a requirement of both Highways England and Staffordshire County Council that the link road between the A5 and A449 be adopted as a public highway. This link road benefits the public and in being adopted, the public right to use this route can be maintained in perpetuity. The internal road between the new link road and Vicarage Road will remain as a private road with no through access.	N
Request for FAL to note that the A51 Lea Hall Way in Staffordshire will be a construction route for HS2.	This information has been considered by FAL and included in the Transport Assessment (Document 6.2, Technical Appendix 15.01).	N
Comment that accident figures used in the assessments should be up to date.	Personal Injury Accident (PIA) data has been obtained from Staffordshire County Council for the most recent five year period (1/7/2011 to 30/6/2016) and has been used in the assessment.	N
Concern that access to the Site from Vicarage Road will lead to rat running, congestion, pollution and compromise the safety of non-motorised users.	The Transport Assessment demonstrates that with the introduction of mitigation measures proposed, the highway network can accommodate the additional traffic associated with the Proposed Development. In addition, the Proposed Development would be accurately signed within the strategic road network to discourage the use of local roads to access the Site. It is therefore not anticipated that rat-running would occur.	Y
Concern that traffic from the Site cannot be managed, leading to rat running on local roads.	Notwithstanding this, FAL is proposing to provide a Contingent Traffic Management Fund. This Fund could be available to be spent on implementing local traffic measures spent if they are considered necessary by Staffordshire	

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
	County Council. Details of the Fund can be found in the Transport Assessment (Document 6.2, Technical Appendix 15.01).	
Request that local developments are included in the cumulative traffic impact: Mill Green Retail Park; HS2 construction traffic; and the new M54/M6 Link.	This information has been considered by FAL and included in the Transport Assessment (Document 6.2, Technical Appendix 15.01).	N
Concern that turning on to the A5 out of the Site could be dangerous.	Given the close proximity to M6 Junction 12, the northern access on the A5 is the key point of access to the Proposed Development for vehicular traffic. A new roundabout is therefore proposed to facility access to the Site from the A5. The roundabout will be constructed to modern safety standards agreed by the highways authorities, Highways England and Staffordshire County Council.	N
Suggestion: include dedicated slip roads on and off the M6 in the Proposed Development.	Highways England does not allow private accesses to be created off the motorway network. The location of the Site was chosen owing to its proximity to the A5, with and access to the motorway network at the M6 Junction 12. Through providing an access point also via the A449 which connects with the M54 to the south, this provides greater resilience to the operation of the Proposed Development by providing two access points from the motorway network.	N
Request the Royal Mail Group is consulted at the appropriate time on the Development Consent Order and is involved with	Royal Mail Group can be advised of the Demolition and Construction Traffic Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix N). However, given that the focus of the document is to ensure there is no impact arising from construction traffic, it will not be necessary for Royal	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
the development of the Construction Transport Management Plan.	Mail Group to be involved in the preparation of the strategy but they will be contacted and involved at the appropriate time.	
Suggestion: FAL to join the Regional Network Resilience Partnership.	Should the development be consented FAL will seek to join the Regional Networks Resilience Partnership.	Y
Request for Transport West Midlands be involved in the development of the Sustainable Transport Strategy, Framework Travel plan, and HGV Management Plan.	FAL welcomes input from Transport for West Midlands into the identified strategies and endorsement in principle of the Proposed Development by Birmingham City Council. The Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G), Site Wide Travel Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix H), and Site Wide HGV Management Plan (Document 6.2, Chapter 15, Technical Appendix J15.01, Appendix I) are included in the application submission.	Y
Comment that not enough information on the rail impact of the Proposed Development has been provided at consultation.	The purpose of the draft Rail Operations Report presented at Stage 2 Statutory Consultation was to provide sufficient detail about the Proposed Development to enable consultees to understand the likely impacts of the proposals. Where further work was required or information was missing this was clearly indicated within the draft and is addressed in the submitted Rail Operations Report (Document 7.3) that accompanies the DCO application.	N
Comment that the Proposed Development would not be acceptable on the existing rail network.	The long-term strategy for the development of the national rail network is based in part on forecast growth in freight traffic arising from the expansion of the network of SRFIs. The Government has endorsed this approach. The Department for Transport has also stated that one of the benefits of HS2 will be to release further capacity on the West Coast Main Line for additional freight trains. In the first phase of the development of WMI, a relatively small number of freight trains are generated initially (up to 4 per day), reflecting the establishment of	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
	occupiers on the Site and growing familiarity with and use of the rail facilities and services. A pathing study has been carried out for the Applicant with Network Rail's support, and has identified the capacity necessary accommodate the emerging requirements of the Proposed Development to operate as a SRFI as defined in the NPS. Further growth in the medium to long term would then align with the long-term national strategy to expand network capacity, including the phased implementation of HS2.	
Comment that signalling requirements should accommodate new main line connections.	A signalling solution has been provided which facilitates a main line connection. Passive provision for the development was built into the design and scope of the Wolverhampton area resignalling scheme, which was brought into use in May 2015. The signalling designer has been brought into the specification process for this proposal, and has made comments and changes which have been incorporated into the design process.	N
Comment that the Timetable Study should be updated to reflect current operations.	Network Rail is wholly responsible for pathing of trains to and from the Site, and would not develop a timetable solution which in any way compromised existing passenger (or freight) services. Paths for new trains to and from the Site would be applied for by the freight train operating companies (not by the Applicant) through established industry processes, as used successfully for every other SRFI over the last 20 years. More detail can be found in the Rail Operations Report (Document 7.3).	N
Comment that the Timetable Study should be reviewed by Network Rail (Train Planning) or Capacity Analysis.	This has been carried out FAL and reviewed by Network Rail.	N
Comment that specific rail paths can and cannot be	The WMI proposals have been developed in close co-operation with Network Rail as the system operator for the main line. The scope of the timetable assessment	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
used to service the Proposed Development.	was agreed in advance with Network Rail, and uses working timetable data and other input parameters as specified by Network Rail. The results indicate that sufficient paths exist in the timetable to enable WMI to operate as a SRFI as envisaged by the National Policy Statement. It should be stressed that the working timetable is not fixed but is subject to a constant rolling development programme over an 18-month cycle, with train operators bidding for paths as part of this process. Train operators serving WMI, as for any other SRFI or RFI, will apply for paths through this standard industry process as required to meet the needs of the customers as occupiers of the SRFI or in the local area, at the time the customers establish their requirements. The proposals for WMI do not therefore attempt to identify specific paths in the timetable several years in advance of when they might be needed, but the level of available capacity in the current timetable provides sufficient confidence that the emerging requirements of the SRFI can be satisfied.	
Comment that a detailed design of where the yard meets the main line is needed before path capacity can be confirmed.	Network Rail has confirmed that the main line infrastructure has the latent capability in terms of track, signalling and electrification to accommodate an additional SRFI at this location. Further detailed design and analysis would be undertaken as the project is developed through later stages of the construction process.	N
Comment that trains associated with the Proposed Development should not conflict with existing passenger services.	Network Rail, as current system operator, would not introduce additional services onto the network that caused material disruption to the timing or performance of existing services. Two timetable studies have been undertaken by the Applicant to assess this. The first study was undertaken by Arup in 2007 and the second was undertaken more recently by PRA Rail Associates in 2017. Both studies indicate that paths are available on the network at regular intervals through the day. As the designs	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
	<p>progress, the parties will need to give a greater definition of the underpinning Timetable Planning Rules (sectional running times, headway, and junction margins).</p> <p>Rail freight demand through SRFIs tends to grow incrementally. Network Rail believes that capacity can be made available for the planned growth of the Proposed Development on the basis that the ultimate capacity required would not be required from the outset and there would be an incremental build-up of freight movement. This should be seen in the context of a long-term approach to planning and developing the rail network, which assumes the majority of new rail freight growth coming from SRFIs such as WMI.</p> <p>The national working timetable is constantly evolving in response to changing customer requirements, and once operational, freight train operators serving WMI would seek paths for trains through the long-established timetable bidding process alongside other passenger and freight train operators.</p>	
Concern that the Proposed Development would not be rail freight only.	All warehouse units at the Proposed Development will be rail served via the terminal. Road operations will also be required for all warehousing units.	N
Comment that the new bridge over the railway would require a grant of rights from Network Rail.	The necessary bridge rights are being progressed as part of the Statement of Common Ground with Network Rail (Document 8.3). No technical obstacles have been identified which would prevent such rights being secured. The Applicant is looking to support Network Rail's ongoing task of improving the integrity of overline structures by the removal of redundant structures, replacing existing structures or building new ones as required by the Proposed Development.	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
Comment that all new rail infrastructure must be compliant with Network Rail Standards.	All new rail infrastructure will be fully compliant with Network Rail standards.	N
Comment that more performance modelling is needed for Network Change and SOAR panel.	All necessary rail industry approvals and consents will be processed at the appropriate design stage. Network Rail, as current system operator, would not introduce additional services onto the network that caused material disruption to the timing or performance of existing services.	N
Comment that a robust system of acceptance into the Site will be needed to ensure trains are not held up on the main line.	Full length trains of up to 775m will be taken off the main line in one movement into the terminal and reception sidings, removing the need to be held on the main line. This is in compliance with the National Policy Statement for Networks.	N
Comment that a robust method of working, track layout, fringe boundaries and timetabling is needed.	The Method of Working for the interchange will be developed with the terminal operator, train operator(s) and the main line system operator (currently Network Rail), and on the basis that trains can be received without standing on the main line, and that trains achieve a right-time departure from Site. The risk of significant delay attribution penalties from the system operator would serve as a commercial incentive to achieve an efficient operation to and from the Site.	N
Comment that the impact of HS2 displacing trains on to slow lines and construction traffic on the rail network needs to be considered.	The Department for Transport has stated that one of the benefits of HS2 will be to release capacity on the West Coast Main Line for additional freight trains; therefore, it makes sense to continue to expand the network of SRFIs with direct access to the West Coast Main Line. Please refer to the Rail Operations Report (Document 7.3) which provides further information.	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
Request that Network Rail continues to be involved in the design of the Proposed Development.	Network Rail will continue to be involved in the full Governance for Railway Investment Projects (GRIP) approval process for the scheme.	N

Topic: Water Environment and Flood Risk		
Summary of responses	Regard to responses (section 49)	Change
Request for further details on the construction of the swales and pipes crossing the canal.	All works on the construction of the pipes crossing the canal will be carried out under an agreement with the Canal and Rivers Trust. The DCO will authorise the works to swales and pipe crossings to be carried out and will include appropriate protective provisions to protect the integrity of the canal.	N
Request for reassurance that the Proposed Development will not damage Four Ashes Pit SSSI, with specific reference to surface water hydrological effects.	The potential effect of the Proposed Development relating to the Four Ashes Pit Site of Special Scientific Interest (SSSI) is addressed within the Ground Conditions chapter of this Environmental Statement (Document 6.2, Chapter 11). It is understood that regional groundwater flow is from east to west within the vicinity of the Proposed Development and hence the SSSI is not considered to be influenced by groundwater concentrations at the Site and the ongoing remediation works. Assessment of potential risks associated with construction effects such as dust have been assessed within the Environmental Statement (Document 6.2, Chapter 11). In accordance with the Outlined Demolition and Construction Environment Management Plan (ODCEMP) (Document 6.2, Technical Appendix 2.5), appropriate mitigation measures, such as damping down and cleaning roadways shall be undertaken throughout the works, whilst also giving due regard to minimisation of surface water runoff to reduce likelihood of effects to the SSSI.	N

Topic: Water Environment and Flood Risk		
Summary of responses	Regard to responses (section 49)	Change
Concern about the impact of the Proposed Development on the groundwater abstraction and remediation scheme that is currently being operated by the Chemical Company, SI Group (UK) Limited.	The proposed surface water strategy specifies that all open water structures (ponds, ditches and basins) are to be lined and there is no infiltration drainage specified anywhere in the system. As such, the proposed scheme will not artificially charge the groundwater table and will therefore not detriment the ongoing abstraction or remediation arrangements. It is proposed that the existing abstraction and remediation will continue unaffected by the Proposed Development.	N
Request that the groundwater abstraction and remediation scheme being undertaken by SI Group (UK) Limited should be considered in the proposed drainage scheme.	The strategy for surface water drainage is discussed in the Water Environment chapter of the Environmental Statement (Document 6.2, Chapter 16). The impact of the works relating to the Proposed Development on the ground water abstraction and remediation scheme of SI Group (UK) Limited have been assessed as set out in the Environmental Statement (Document 6.2, Chapter 11).	
Comment that FAL should consider the impact on groundwater resources and flooding by the diversion to surface water of water that currently potentially infiltrates the underlying Principal Aquifer.	Groundwater receptors have been fully considered in the Ground Conditions chapter of the Environmental Statement (Document 6.2, Chapter 11), including the underlying Principal Aquifer.	N
Comment that FAL should consider the use of	Infiltration drainage may be considered at detailed design stage, at a point where targeted geo-environmental investigations can be undertaken for specific	N

Topic: Water Environment and Flood Risk		
Summary of responses	Regard to responses (section 49)	Change
infiltration drainage (where ground conditions permit and with suitable treatment steps to prevent the pollution of groundwater) particularly for clean run-off such as roof water.	plots. The strategy for surface water drainage is discussed in the Water Environment chapter of the Environmental Statement (Document 6.2, Chapter 16).	
Request that greater weight should be given to the protection of the underlying aquifer.	Groundwater receptors have been fully considered in the Ground Conditions chapter of the Environmental Statement (Document 6.2, Chapter 11), including the underlying Principal Aquifer.	N
Comment that FAL should discuss with Severn Trent Water capacity within both their pipe network and treatment facilities to accommodate the management of foul drainage during both the construction phases and during operation.	Severn Trent have been consulted as part of the design process and have confirmed that there is adequate capacity in the local treatment works. Any required reinforcements to the local sewer network will be installed in agreement with Severn Trent at the appropriate stage of development. Network capacity is discussed in the Environmental Statement (Document 6.2, Chapter 16)	N
Comment that FAL should detail the solution for temporary foul drainage during the construction phase.	Temporary foul drainage has been considered and is discussed in the Construction Phase chapter of the Environmental Statement (Document 6.2, Chapter 16).	N

Topic: Water Environment and Flood Risk		
Summary of responses	Regard to responses (section 49)	Change
Comment that FAL should consider additional treatment drains be incorporated into the scheme to complement the swales and detention basins currently proposed.	The surface water drainage strategy is designed in accordance with current sustainable drainage technical and best practice guidelines to include the required treatment is achieved. Water quality is discussed in the Water and Flood Risk chapter of the Environmental Statement (Document 6.2, Chapter 16).	N
Request that the possible impacts caused by changes in drainage are assessed in relation to Cannock Extension Canal SAC.	The Cannock Extension Canal is approximately 10km from the Site. Canal and Rivers Trust have been consulted throughout the design. The drainage outfall to the canal is discussed in the Water and Flood Risk chapter of the Environmental Statement (Document 6.2, Chapter 16).	N
Request that a requirement is included in the DCO to ensure that development does not proceed until all contamination issues have been resolved within a phase so that development does not compromise the ability to undertake any required remediation.	The Applicant team has been liaising with the Environment Agency and South Staffordshire District Council on contamination matters. It is proposed that a DCO Requirement be secured that requires (where applicable) further assessment / remediation as part of the development works. It should be noted that extensive intrusive investigation has already been conducted across the Site and apart from one area on-site there is considered to be a low risk of significant contamination being present.	N
Comment that FAL should demonstrate how two abstraction licenses and	The Applicant team has liaised with the Environment Agency on this matter and it is considered that development proposals can progress without significant impact upon existing abstractions.	N

Topic: Water Environment and Flood Risk		
Summary of responses	Regard to responses (section 49)	Change
associated boreholes will not be impacted.		
Suggestion: provide more details if surface water drainage into the canal from the whole Site is proposed.	The current surface water drainage proposals utilise the canal for only a small proportion of the Site. The drainage outfall to the canal is discussed in the Water and Flood Risk chapter of the Environmental Statement (Document 6.2, Chapter 16).	N
Suggestion: FAL engage with Staffordshire Trent Valley Catchment Partnership on the Proposed Development.	The Applicant team has engaged with this party and as requested forwarded a copy of the Water Framework Directive Assessment report (Document 6.2, Technical Appendix 16.02).	

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
Suggestion: strategic landscaping should be completed within first phase of development to reduce visual impact during construction.	<p>The strategic landscape proposals will be phased during the construction period. Phased mounding and woodland, tree and hedgerow planting and other green infrastructure and open space proposals will be implemented over this period. However, it is not practicable to implement all of the strategic landscaping within the first phase.</p> <p>The design and layout of the development proposals have given sufficient consideration of the visual effects during the construction period, taking into account that the strategic landscaping proposals will be phased throughout this period.</p>	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
Comment that the warehousing units could be more sympathetically positioned away from settlements.	The building height parameters have been set to ensure the tallest 30m zone is towards the centre of the development, the 20m zone abuts the entire perimeter of the development and residential/canal corridor areas, and covers approximately 62% of the development. More detail is set out in the Design and Access Statement (Document 7.5).	N
Comment that the Illustrative Masterplan fails to show the section of the Staffordshire and Worcester Canal which is closest to Straight Mile, next to the SRFI Site.	The Landscape and Green Infrastructure Illustrative Plan (Document 6.2, Figure 12.11) shows this section of the canal coloured.	N
Concerns about the visual impact of the Proposed Development including the height of buildings, an unsuitable design.	<p>The potential visual effects of the Proposed Development have been an important consideration in designing the scheme and have been assessed. There will inevitably be some significant visual effects. However, careful attention has been paid to the building surrounds to include mounding and planting to limit views particularly towards the lower active parts of the Proposed Development. Consideration of the colours and elevational treatments of the buildings will also assist in mitigating the visual effects.</p> <p>The building height parameters have been set to ensure the tallest 30m zone is towards the centre of the development; the 20m zone abuts all the perimeter of the development and residential/canal corridor areas and covers approximately 62% of the development. The building cladding panels will be designed to minimise visual impact.</p>	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
	The approach being taken is set out in the Design and Access Statement (Document 7.5, Sections 6.5 and 6.6).	

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
Concern that the proposed Community Parks could adversely affect the canal setting.	<p>The Community Parks will change the character of the existing fields, but this will not change the visual character of the canal or an appreciation of the surrounding landscape when using the canal or towpaths. From the canal and towpaths, the overall experience of travelling through open, green areas along the canal will be the same whether that is a Community Park or field.</p> <p>The conservation area appraisals for the canal recognise that the primary use of the canal is now for public leisure and it has this character as a result. The original industrial use and character is lost. It is considered that the Community Parks will complement the character of the canal as a location for leisure activities, despite it differing from the historic context.</p> <p>Furthermore, the Community Parks will enable better public access and appreciation of the canal conservation area as a heritage asset.</p>	N
Suggestion: that a community park is created alongside Hatherton Canal as this would be of greater benefit to Calf Heath residents.	The two Community Parks that will be created from part of the Green Infrastructure areas directly associated with the Site include landscape and visual mitigation measures as well as other conservation and enhancement proposals. Both of these parks will include paths and public access from the nearby settlement areas and properties, and will represent positive new resources for use by the local community. This is a substantial mitigation	N

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
	measure, but additional community park areas would not be justified in terms of mitigation of the Development.	
Comment that it is unclear how local communities will be included in the design of the Community Parks.	<p>A liaison committee, involving local representatives and dealing with a number of aspects of the Site, will be established. This will be secured by a requirement in the Development Consent Order.</p> <p>The two Community Parks will provide local access to over 44 hectares (109 acres) of open space, suitable for walking, cycling, running and other activities, which will be linked by new footpaths to the existing canal towpath. Attenuation swales and lagoons required for the Proposed Development will be located within the Parks and provide habitat for local wildlife. Additional information on the Parks has been included within the Design and Access Statement (Document 7.5).</p>	Y

Topic: Canalside environment		
Summary of responses	Regard to responses (section 49)	Change
Concern that the new bridge crossing will create a tunnelling effect on the towpath and waterway.	The tunnelling effect has been assessed from a heritage perspective in the Built Heritage Chapter of the Environmental Statement (Document 6.2, Chapter 9). At Gravelly Way, the canal meanders to the east and it is not possible to appreciate its linear quality or long views down the waterway, which contribute to the character and appearance of the conservation area. The new bridge will not, therefore, 'tunnel' this part of the canal or cause harm to the linear aspect of the character of the conservation area. Furthermore, passing underneath bridges is a common experience when travelling on a canal.	N

Topic: Canalside environment		
Summary of responses	Regard to responses (section 49)	Change
Concern that the design of the new bridge crossing does not consider the character and circumstances of the canal.	<p>The design, location and arrangement for the new bridge crossing has been carefully considered to minimise any impact on the historic environment. The designs reflect the guidance published by the Canal and River Trust, and the proposed materials respond directly to comments raised by CRT.</p> <p>We are aware of comments that suggest the new bridge at Gravelly Way could create a 'tunnelling effect' in this part of the canal and affect the character of the conservation area. This point has been dealt with in the Built Heritage Chapter of the Environmental Statement (Document 6.2, Chapter 9). In summary: at Gravelly Way, the canal meanders to the east and it is not possible to appreciate its linear quality or long views down the waterway which contribute to the character and appearance of the conservation area. It is not possible for the new bridge to create a tunnelling effect this part of the canal or, in doing so, create a change to the linear aspect of the conservation area's character. Furthermore, passing underneath bridges is a common experience when travelling on a canal, and is thus consistent with the existing experience of the canal conservation area.</p>	Y
Comment that an assessment of the existing bridges should be included, and appropriate restoration included.	The impact of the project on local bridges has been reviewed which has concluded that no significant impact will occur. The proposals do not involve any direct impact on the bridges, i.e. erosion or removal of their fabric.	N
Comment that the impact on Long Molls Bridge needs to be considered during construction and operation,	It is not envisaged that construction traffic would need to use this bridge, but if it were used, the bridge and the access road are publicly adopted roads and are assessed in accordance with accepted standards.	N

Topic: Canalside environment		
Summary of responses	Regard to responses (section 49)	Change
and mitigation submitted for assessment.		
Concern that there has been no detailed assessment of the impact on the structure of Deepmore Bridge.	<p>A heritage assessment of Deepmore Bridge as a locally listed building is included in the Built Heritage Chapter of the Environmental Statement (Document 6.2, Chapter 9).</p> <p>In terms of structure, Deepmore Bridge appears to provide access to agricultural land and is not considered to be affected by the proposals.</p>	N
Request for detail of the towpath works.	Information about the towpath works can be found in the Design and Access Statement (Document 7.5)	N
Comment that the canal network has not been considered as a walking and cycling route to the Proposed Development.	The Transport Assessment (Document 6.2, Technical Appendix 15.01) has considered the use of the canal as a walking and cycling route to the Proposed Development.	N
Comment that wider improvements to the canal network are needed to cover increased maintenance costs, upgrade the towpath surface and access points to the required standard.	<p>It is proposed that improved access to the canal, together with improvements to the towpath, be provided, and that this will be provided within the parameters of the canal that sit within the Order limits. Details of the Canal Enhancement Scheme are included in Chapter 9 of the Environmental Statement (Document 6.2). In summary this includes:</p> <ul style="list-style-type: none"> • Works to improve the towpath by resurfacing it with a suitable surface (i.e bound/compacted gravel such as Breedon gravel type); • The creation of two new pedestrian connections to the towpath from Croft Lane Community Park; 	Y
Comment that the submission does not include details of the physical difficulties which		

Topic: Canalside environment		
Summary of responses	Regard to responses (section 49)	Change
<p>make it unfeasible to connect the Site along the canal corridor.</p> <p>Comment that a wider assessment of the impacts to the towpath should be undertaken. This could include a width survey, the impact of the proposals on existing access points and the requirement for new access points.</p>	<ul style="list-style-type: none"> Improvements to the existing pedestrian access points at the A5, Hoppe Roundabout and Station Road; and The introduction of interpretation boards and signage. <p>The Canal Enhancement scheme has been produced in consultation with the Canals and River Trust and will be delivered through protective provisions.</p>	

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses (section 49)	Change
<p>Concern that the visual impact of the Proposed Development on Calf Heath Reservoir will make it less attractive for recreation.</p>	<p>The landscape and visual chapter of the Environmental Statement (Document 6.2, Chapter 12) assesses the visual effects of the Proposed Development on users of the reservoir. During construction and upon completion of the Proposed Development, the visual effects will be Moderate/Major Adverse. Existing tall mature trees surrounding much of the reservoir on its southern site will provide some visual screening and filtering that will be reinforced with further planting. Where views are more open directly to the west, the proposed perimeter mounding and associated new woodland planting will offer some screening and filtering, notably to the lower active parts of the development. In time this screening and filtering will strengthen.</p>	N

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses (section 49)	Change
	It should also be recognised that the existing reservoir users have close open views to the A5 traffic immediately adjoining the northern reservoir boundary.	
Request for an assessment of the potential impact of the development on wind on Calf Heath Reservoir.	A desk-based study (Document 6.2, Technical Appendix 14.01) has concluded that sailing quality is unlikely to be affected for 70% of the time throughout the year. For the other 30% of the year, there will be some impact due to obstruction of some western winds. The effect, however, would be reduced by minimising landscaping and by limiting the height and number of buildings. Following the DCO application submission, when the structural design of the Proposed Development has been determined, it will be used to conduct a wind tunnel test to measure the changes in wind speed, direction and turbulence around Calf Heath Reservoir and to establish the effects of the Proposed Development.	Y
Comment that account needs to be made of the ditch at the toe of the west dam on Calf Heath Reservoir, which provides foot access to its west side.	The requirements for the ditch at the toe of the west dam on Calf Heath Reservoir will be met (see Document 6.2, Technical Appendix 16.03, Sub-Appendix G).	N
Request for an access strip to be provided for heavy plant to access west dam for future remedial works.	Access for equipment to the dam has been incorporated into the designs.	Y
Request for a full assessment of the Proposed Development on the stability of west dam.	The nearest building is 59m from the dam and the closest yard is 26m, neither of which will be in the zone of influence for the reservoir and western embankment.	N

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses (section 49)	Change
Request for the feeder channel alongside the A5 to have a 2m strip of land alongside the southern boundary to enable maintenance to be carried out.	The requirements for the feeder channel alongside the A5 will be met (see Document 6.2, Technical Appendix 16.03, Sub-Appendix G).	N
Request for unrestricted access along the feeder channel alongside the A5, and for details of the maintenance contractor and regimes for assessment and agreement.		
Request for clarification of the suggested cleaning and realignment of a diagonal feeder culvert beneath the A5 from Calf Heath Reservoir.	The diagonal feeder culvert is outside the Order Limits, and is not to be affected by the development. Improvement works are therefore not considered appropriate or relevant.	N

Topic: Property and land		
Summary of responses	Regard to responses (section 49)	Change
Comment that the Proposed Development	Any necessary agreements with the Canal and Rivers Trust are being progressed with their co-operation.	N

Topic: Property and land		
Summary of responses	Regard to responses (section 49)	Change
would require a legal agreement with the Canal and Rivers Trust.		
Comment that Network Rail will require protective provisions as well as completing a Deed of Undertaking and Property Agreements.	Protective Provisions and other agreements with Network Rail are being progressed.	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
Comment that the Stage 2 Statutory Consultation was too short.	Stage 2 Consultation (statutory) was undertaken for a period of 8 weeks between 5 July and 30 August 2017. The statutory minimum is 4 weeks. The FAL team considered the length of consultation was appropriate to accommodate the summer holiday period and this was reviewed by both South Staffordshire District Council and Staffordshire County Council as part of the Statement of Community Consultation (SoCC) process.	N
Comment that the consultation was inadequate and flawed.	In preparing for statutory consultation (Stage 2), FAL prepared a SoCC which set out how it planned to consult, and this was reviewed by both South Staffordshire District Council and Staffordshire County Council. Both authorities agreed that the approach to consultation was appropriate for the Proposed Development. The Stage 2 Consultation complied with the SoCC.	N
Comment that consultants failed to give answers to	The FAL team has always been open about the level of information provided for consultation, and honest in acknowledging if answers to questions were not	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
questions posed at the public exhibitions.	<p>known at the time. During statutory consultation (Stage 2), the team was aware that some further technical and development work was still required and that in some instances, it would be unable to provide the information requested.</p> <p>FAL recognises that local residents and businesses will be much better informed about local knowledge and the intelligence that the Team has gained from discussing local issues with communities has been invaluable in helping to shape the proposals.</p>	
Comment that Calf Heath Marina, and angling and canoe clubs which use the canal should have been consulted directly.	Calf Heath Marina, the canoe club and those with angling interests were contacted directly during Stage 1 and Stage 2 Consultation as part of the mailing to residents and businesses in the Consultation Zone.	N
Request for timescales for the Proposed Development are provided.	Should a DCO consent be received in 2019, it is anticipated that the construction of the Proposed Development will take place over approximately 15 years. Phased works will be made up of a number of elements to include infrastructure (roads, bridges, drainage, etc.), two phases of the rail freight terminal and individual warehouse buildings, with relevant earthworks, landscaping and utilities works to be undertaken in each phase. The phased works would serve the delivery of the principal warehouse buildings, the delivery and timing of which would respond to market demand. Further details about the phasing and the construction programme are contained in the Planning Statement (Document 7.1A, Chapter 3).	N
Request that the three nearest aerodromes, Otherton Airfield, Cosford RAF Aerodrome, and	Following receipt of the consultation response, FAL contacted each aerodrome to provide them with an opportunity to view the Stage 2 Statutory Consultation documents and provide feedback. No responses were received.	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
Seighford Gliding Club, are consulted.		
Suggestion: notify the Safeguarding Department within the Ministry of Defence's Defence Infrastructure Organisation.	Following receipt of the consultation response, FAL contacted the Safeguarding Department to provide them with an opportunity to view the Stage 2 Statutory Consultation documents and provide feedback. Feedback was subsequently received from the Safeguarding Department.	N

Topic: Other		
Summary of responses	Regard to responses (section 49)	Change
Comment that there are statutory utilities in the vicinity of the SRFI Site which will need to be protected.	Protective Provisions are being agreed with the statutory utilities with assets within the Site redline boundary.	N
Request for details on how the existing redundant access and pipe bridges adjacent to the existing chemical works will be removed and remediated.	The redundant pipes and redundant access bridge will be removed in agreement with the Canals and Rivers Trust. For more details section 7.9 of the Design and Access Statement (Document 7.5).	N
Comment that crane requirements will need to be considered in relation to airspace regulations as	The cranes will be up to 30m tall and therefore do not need to be considered in relation to the airspace regulations.	N

Topic: Other		
Summary of responses	Regard to responses (section 49)	Change
part of the construction works.		
Comment that the risk or impacts from electric or magnetic fields associated with existing overhead electricity lines needs to be considered.	Within the Site Order Limits, no overhead electricity lines will pass over buildings as part of the Proposed Development, and therefore this is not a consideration.	N

10.4. Persons with an interest in land (PILs)

- 10.4.1. The tables below summarise and provide a response to the feedback received from PILs as part of the Stage 2 Statutory Consultation.
- 10.4.2. The 'Change?' column in the tables refers to whether or not the comment or issue summarised led to a change in the Application.
- 10.4.3. There is a slight variation to the suggested table contained in the Annex to the Planning Inspectorate's Advice Note Fourteen; the columns "Date consulted" and "Response deadline" have been removed to reduce repetition. This is because those dates are the same for all consultees. The "date consulted" is 5 July 2017 and the "response deadline" was 30 August 2017.
- 10.4.4. It is important to note that as with any analysis of text-based feedback, there is likely to be a difference of opinion on how certain elements are interpreted or summarised. To avoid duplication cells have been combined where the regard to responses is the same.

Table 12: Summary of PILs responses and consideration, by topic

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
Site should be located nearer to unemployed populations	<p>A full Alternative Sites Assessment (Document 7.2) has demonstrated why this is the only site to deliver this infrastructure within an area of demonstrable and established need. Increased job opportunities would help to reduce the substantial amounts of out-commuting currently occurring in South Staffordshire. In addition, the</p> <p>The profile of the available workforce in the area matches the requirements of the occupiers of the Proposed Development.</p>	N
Suggestions for alternative site: Rugeley	Rugeley Power Station has been identified and analysed as a potential alternative site in the Alternative Sites Assessment and was included on the short list of potential alternative sites, however, the site was discounted on the basis that the links to the strategic road network are not suitable for an SRFI facility. In addition, whilst the site is not yet formally designated for residential use, it is being considered for contributions to meeting the future housing needs. A portion of the site may be available for employment development; however, it is unlikely to be at the scale required to meet the current SRFI demand. Please refer to the Alternative Sites Assessment (Document 7.2, Section 8.7) for further details.	N
Suggestions for alternative site: Bescot, Walsall	The Bescot Rail Siding site is considered in the Alternative Sites Assessment (Document 7.2). The Bescot site is limited in the available land, below the 60ha fundamental criteria, which rules it out as an appropriate alternative site. Also, whilst this site is within 5km from a motorway junction, access to Junction 9 of the M6 requires traveling approximately 3.5km along the A4031 and A4148. This would require travelling through built up and residential areas that would not be suitable for HGV traffic. Finally, a significant portion of the site is allocated by the Sandwell Local Plan for residential development and community open space.	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	On this basis, Bescot Rail Sidings is not considered to be a suitable or appropriate alternative site.	
Suggestions for alternative site: Featherstone Army Base	The former Royal Ordnance Site at Featherstone has been identified and analysed as a potential alternative site in the Alternative Sites Assessment (Document 7.2) and was included on the short list of potential alternative sites. However, this site was discounted as a result of difficulties in achieving rail access, which undermines the site's suitability. It was also discounted due to the close proximity of a relatively large numbers of residential properties, which represents a significant constraint to the successful operation of rail facilities. The size and shape of the site combined with the likely route of any rail link would create a very inefficient layout, reducing capacity and limiting site development. Please refer to the Alternative Sites Assessment (Document 7.2, Section 8.6) for further details.	N
Suggestions for alternative site: Stoke	Sites within Stoke-on-Trent would serve a different catchment area and would not meet the demands of the Wolverhampton/Birmingham conurbation or needs of the distribution industry in the Black Country and southern Staffordshire. Nevertheless, Etruria Valley is currently in the process of being developed and sufficient land is not available, even if Stoke-on-Trent was included within the search area.	N
Suggestions for alternative site: Telford	A search area was created as part of the Alternative Sites Assessment (Document 7.2), within which a need exists for an SRFI, and it is appropriate to search for sites that could potentially meet that need. Telford, Donnington does not form part of the search area for an SRFI development, and sites which are located beyond the search area are not considered to be suitable alternatives. This is because they would not meet the demands of the Wolverhampton/Birmingham conurbation or needs of the distribution industry in	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	the Black Country and southern Staffordshire. In any event the rail line to Telford does not have sufficient gauge to be attractive to rail users.	
Suggestions for alternative site: Sandwell, Wednesbury, Wolverhampton	A comprehensive review of planning policy, field study and map search confirmed that there are no sites within the Black Country of a sufficient size to potentially accommodate an SRFI. The established built-up nature of the Black Country (particularly along the existing rail lines) means that there are no unbuilt or unallocated sites of over 60 ha. More details can be found in the Alternative Sites Assessment (Document 7.2).	N

Topic: Site Suitability		
Summary of responses	Regard to responses (section 49)	Change
Concern about loss of agricultural land and subsequent issue of food security.	<p>The National Policy Statement (NPS) requires applicants to <i>"take into account the economic and other benefits of the best and most versatile agricultural land"</i> and to <i>"seek to use areas of poorer quality land in preference to that of higher quality"</i>.</p> <p>The Site consists of grassland and arable land, with some woodland, with around 59% of the Site categorised as between Grade 2 (Very Good) and Grade 3a (Good) agricultural land (see the Planning Statement (Document 7.1A, Section 7.3) for further details). There is no Grade 1 (Excellent) agricultural land at the Site.</p> <p>The presence of Grade 2 and Grade 3 agricultural land at the Site is to be expected, as these grades of agricultural land are widespread in the district and the Alternative Sites Assessment has confirmed that there are no alternative sites which could meet the need for a Strategic Rail Freight Interchange.</p>	N

Topic: Site Suitability		
Summary of responses	Regard to responses (section 49)	Change
	Appropriate brownfield land is not available and the Site's location and nature means that the permanent loss of agricultural land is inevitable. The significant benefits that would arise as a result of the Proposed Development outweigh the impacts of the loss of a not uncommon resource in this location and would not be expected to impact on food security.	
Concern about the potential loss of rural character, residential amenity and loss of countryside.	The Site has been chosen in part due to its limited potential impact on a major built up area, whilst being close to the conurbation it would principally serve. The scale and exceptional relationship of the Site with major road and rail routes make it the only site suitable in the area to meet the need for an SRFI. Nevertheless, the Applicant acknowledges that the Proposed Development has the potential to impact those close to the Site and has sought to address and minimise these potential impacts through appropriate mitigation measures, in accordance with NPS paragraph 4.86 and consistently with its own adopted vision for how the Proposed Development should be undertaken – see the Planning Statement (Document 7.1A, paragraph 1.2.2).	N
Concern that that Proposed Development would spoil the rural beauty/identity/ambience of the area, especially the Area of Outstanding Natural Beauty (AONB).	The effects of the Proposed Development upon the landscape and the AONB have been undertaken in accordance with best practice. In relation to the AONB, this lies approximately 3km to the east of the Site. Potential views towards the Proposed Development from the AONB will be limited to a very small part of the designated landscape at its south western extent. This will include Shoal Hill. The effects of the Proposed Development upon the AONB and the special qualities of this landscape and upon users of the AONB (including Shoal Hill) are detailed in the Environmental Statement (Document 6.2, Chapter 12). A photomontage depicting the view of the Proposed Development from Shoal Hill is included at Figure 12.13 (Viewpoint 32). Careful attention has been paid to the effects of the Proposed Development upon this landscape.	N

Topic: Site Suitability		
Summary of responses	Regard to responses (section 49)	Change
Concerns that the proposal does not meet the proper legal requirements to develop on Green Belt land, that it would be inappropriate development on the Green Belt, or that no evidence has been provided of the special circumstances needed to justify development in the Green Belt.	The WMI Site lies within Green Belt land and there is, therefore, a requirement to demonstrate that very special circumstances exist to justify inappropriate development. As set out in the Planning Statement (Document 7.1A), very special circumstances are considered to exist and the absence of alternative sites in the search area mean that national policy objectives clearly expressed in the NPS to meet the compelling need for a network of large scale SRFIs will not be met unless Green Belt development is permitted in principle. In this context, the NPS recognises that, due to the geographic requirements of SRFIs, promoters may find that the only viable sites for meeting the need for regional SRFIs are on Green Belt land (paragraph 5.172).	N
Concern that the countryside would become urbanised.	<p>The WMI Site is surrounded and intersected by a number of urban and industrial influences, including the A449, the A5, the M6, the West Coast Main Line, the Staffordshire and Worcestershire Canal, Calf Heath Reservoir, the Four Ashes Industrial Estate, the SI Group Chemical Plant and the Calf Heath Quarry.</p> <p>Also adjacent to the Site boundary is the Veolia Energy Recovery Facility, the Severn Trent Sludge Disposal Centre and the Gestamp Stamping Factory to the south, with the Rodbaston Wind Farm approximately 1km to the north.</p> <p>The Order Limits (Document 2.4) proposed for WMI fall within this heavily urbanised and industrialised area, with a strong landscape and green infrastructure strategy proposed as part of the scheme to ensure that the impact of the Site on the surrounding landscape will be minimised.</p>	N

Topic: Site Suitability		
Summary of responses	Regard to responses (section 49)	Change
	The majority of the countryside surrounding the WMI Site lies within the Green Belt, and therefore no further development will come forward on the land surrounding the Site unless very special circumstances are demonstrated to exist to justify inappropriate development.	
Concern that mitigation proposals for loss of green belt and pollution are not good enough including on the Cannock Chase AONB.	<p>The assessment methodology, outcomes and mitigation have been agreed in consultation with stakeholders and regulatory bodies including Natural England, Staffordshire County Council, The Canal and Rivers Trust and Staffordshire Wildlife Trust. A comprehensive package of embedded mitigation measures has been incorporated into the scheme to mitigate effects on ecological receptors, described on pages 21 to 24 of the Ecology chapter (Document 6.2, Chapter 10). The effects of the Proposed Development on identified ecological receptors are presented on pages 24 to 41 of the Ecology Chapter, and mitigation and residual effects are provided on pages 44 and 45 (Document 6.2, Chapter 10).</p> <p>Cannock Chase has been considered as part of the habitats regulation assessment and has been furthered considered in the air quality chapter of the final Environmental Statement. Potential effects on European Designated Sites, including Cannock Chase Special Area of Conservation (SAC), are considered in a Habitat Regulations Assessment (HRA) No Significant Effects Report (NSER). No significant effects are identified either in the Environmental Statement (Document 6.2) or the NSER on habitats at Cannock Chase, including from air quality.</p>	N
General concern that the proposed site is too large for the area.	The issue of scale is addressed in detail in the Planning Statement (Document 7.1A, Section 5.4). The Proposed Development is a direct response to the scale of the unmet need for rail-served warehousing in the north west of the West Midlands. The proposals would be of sufficient scale to be attractive to the	N

Topic: Site Suitability		
Summary of responses	Regard to responses (section 49)	Change
	market and to secure the frequency of trains necessary to achieve a high quality rail-served centre for distribution. This would enable significant modal shift away from exclusively HGV based distribution, which is characteristic of the area.	
Suggestion that alternative brownfield sites should be used instead of Green Belt.	The Alternative Sites Assessment (Document 7.2) considers all sites and possible locations for a Strategic Rail Freight Interchange, exploring the extent to which alternative sites could meet the need which has been identified. The Alternative Sites Assessment explores whether or not this identified need can be met without the use of Green Belt land and on brownfield land. It is clear from the Assessment that the key criteria for an SRFI facility, principally the need to efficiently link to both the national road and rail networks, greatly restricts the SRFI development opportunities within the search area. Whilst theoretical locations for SRFIs have been identified, it is clear that, apart from West Midlands Interchange, there are no brownfield sites within the search area which represent genuinely suitable locations for a Strategic Rail Freight Interchange development.	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
General concerns about environmental damage and pollution	FAL is required to undertake an Environmental Impact Assessment of the Proposed Development. This process identifies the likely significant environmental impacts (both beneficial and adverse) of the Proposed Development and aims to prevent, reduce and offset any potential significant adverse environmental effects. The Assessment includes residential amenity. A comprehensive Environmental Statement (Document 6.2) has been submitted	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
	as part of the Development Consent Order application, which provides details of the Environmental Impact Assessment undertaken.	
Concerns about the negative impact on historically significant sites like the Roman road and ruins.	<p>Archaeological evaluation has been undertaken which includes agreement of a written scheme of investigation (WSI) with Staffordshire County Council.</p> <p>The Roman ruins in proximity to the Site are considered in the Heritage chapter of the Environmental Statement (Document 6.2, Chapter 9), because they are subject to statutory heritage designation as Scheduled Ancient Monuments. The Assessment finds that the change to the character of the land contained within the Application Site will not affect any appreciation of the Roman remains which are, in any event, below ground. There will be no shared visibility because of distance, interposing development and screening.</p> <p>It is assumed that the Roman road referred to is the A5 at the north boundary of the Site which has its origins in the Roman road, Watling Street. The character of the A5 is entirely modern and passes through a range of modern environments, including the M6 interchange to the east.</p>	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
Concern about an increased in air and noise pollution with further concerns that the felling of trees will exacerbate these issues	The Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment carried out for the Environmental Statement (Document 6.2, Technical Appendix 15.01). The air quality assessment considers potential emissions against the Air Quality Standards Regulations 2016. These standards	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
Concern that mitigation proposals for air pollution are not good enough.	<p>are based on human health criteria. The assessment considers potential increases in NOx and other emissions from traffic as a result of the Proposed Development. Both the transport and air quality chapters include receptors and the road network at Penkridge.</p> <p>Regarding noise, the parameters plans include extensive bunding, which has been proposed in consideration of potential noise and visual impacts. The potential impacts of noise and vibration both from construction and operation of the Proposed Development are assessed in the Environmental Statement (Document 6.2, Chapter 13).</p> <p>Trees at the Site will be retained where possible, and the Proposed Development includes a comprehensive landscaping buffer and bunds planted with trees which will mitigate visual, noise and air quality effects to nearby receptors. The provision of the two Community Parks will also separate the developed areas/roads from receptors with significant widths of landscaping.</p>	

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
Concern about the impact of the development on wildlife.	The Ecology and Nature Conservation chapter of the Environmental Statement (Document 6.2, Chapter 10) provides a comprehensive assessment of the potential effects of the Proposed Development on all identified ecological receptors, including designated sites, habitats and species.	N
Concern that mitigation proposals are insufficient	The assessment methodology, outcomes and mitigation have been agreed in consultation with stakeholders and regulatory bodies, including Natural England, Staffordshire County Council and Staffordshire Wildlife Trust. A comprehensive	Y

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
for protecting wildlife and nature	<p>package of embedded mitigation measures has been incorporated into the scheme to mitigate effects on ecological receptors, described on pages 21 to 24 of the Ecology chapter (Document 6.2, Chapter 10). The effects of the Proposed Development on identified ecological receptors are presented on pages 24 to 41 of the Ecology chapter (Document 6.2, Chapter 10), and mitigation and residual effects are provided on pages 44 and 45 (Document 6.2, Chapter 10).</p> <p>The design principles for the Community Parks include biodiversity enhancement. In many areas of the Site, there are many similar habitats that are less biodiverse; the Community Parks therefore comprise an opportunity for ecological enhancement. Furthermore, the scheme has been altered to improve ecological corridors across the Site, thus further minimising effects on protected species.</p>	

Topic: Landscape and visual impact		
Summary of responses	Regard to responses (section 49)	Change
Concern that the buildings are too large/high to be hidden by trees. This led to a request for a 12m high embankment around hub to minimise light pollution.	The primary purpose of earth banks and trees are not for restricting lighting. Lighting will include downward directional lighting, specified to minimise the effects of potential spillage. Further details are included in the draft Lighting Strategy Concerning the visual effects, the Proposed Development will not be completely hidden by trees. However, the existing conserved and new woodland, tree and other planting, in conjunction with the proposed mounding, will be effective in screening much of the lower and 'active' parts of the Proposed Development.	N

Topic: Landscape and visual impact		
Summary of responses	Regard to responses (section 49)	Change
	<p>Closer residential receptors would be likely to experience a Moderate Adverse impact in terms of light presence (visibility of lighting, including lit surfaces), and a slight or moderate increase in local sky glow. All other lighting impacts on non-ecological receptors would likely be Minor Adverse or Negligible. Further details can be found in the Lighting Strategy, which forms Technical Appendix 12.8 of the Environmental Statement (Document 6.2).</p>	
<p>Concern that the buildings are too large to be hidden by trees. This led to and comments that the Proposed Development would be have a negative visual impact on the landscape.</p>	<p>The potential visual effects of the Proposed Development have been an important consideration in designing the scheme and have been assessed. There will inevitably be some significant visual effects; however, careful attention has been paid to the building surrounds to include mounding and planting to limit views, particularly towards the lower active parts of the Proposed Development. Attention to the colours and elevational treatments of the buildings will also help to mitigate the visual effects, as outlined in the Design and Access Statement (Document 7.5).</p> <p>The building height parameters have been established to ensure that the tallest 30m zone is towards the centre of the Proposed Development, the 20m zone abuts the entire perimeter of the Proposed Development and residential/canal corridor areas, and covers approximately 62% of the Proposed Development. The building cladding panels will be designed to minimise visual impact, and the approach being taken is set out in the Design and Access Statement (Document 7.5, Sections 6.5 and 6.6).</p>	N
<p>Suggestion: trees/fences for all residents who can see the interchange.</p>	<p>The Proposed Development includes extensive new mounding and tree planting within the Site to screen and mitigate potential views towards the scheme from surrounding properties and locations.</p>	N

Topic: Landscape and visual impact		
Summary of responses	Regard to responses (section 49)	Change
Request to plant trees early on the give maximum screening.	The landscape and planting proposals will be phased as part of the overall scheme. This will include significant planting and the formation of the Croft Lane Community Park within the indicative Phase 1, and the southern part of the Calf Heath Community Park within the indicative Phase 2. Other planting will be undertaken as soon as practicable within the respective phase and often following the formation of the earthworks/mounding.	N
General concerns about increased light pollution as a result of the Proposed Development including its 24/7 nature.	<p>Closer residential receptors would be likely to experience a Moderate Adverse impact in terms of light presence (visibility of lighting, including lit surfaces), and a slight or moderate increase in local sky glow. All other lighting impacts on non-ecological receptors would likely be Minor Adverse or Negligible.</p> <p>In light of comments from Stage 2 Consultation, additional dark wildlife corridors have been provided throughout the Site to minimise and mitigate against the potential impacts of light on wildlife; for example, the area between Zones A4 and A5 on the Development Zone Parameter Plan (Document 2.5) has been widened to 100m.</p> <p>Properties on Straight Mile would experience a very slight increase in sky glow in the direction of the Proposed Development, and it is concluded that the increase in light presence will be slight. Mounding and planting will limit the effects of the lighting at the Proposed Development.</p> <p>Properties in Coven and Brewood may have small glimpses of the Proposed Development; however, existing vegetation and newly-proposed landscaping will eliminate most of the lit development from view. There will be at most a very slight increase in local sky glow in the direction of the Proposed Development.</p>	Y

Topic: Landscape and visual impact		
Summary of responses	Regard to responses (section 49)	Change
	Further details can be found in the Lighting Strategy, which forms Technical Appendix 12.8 of the Environmental Statement (Document 6.2, Technical Appendix 12.8).	
Concern that mitigation measures are insufficient for light pollution including comments that banks around the warehousing are not high enough and trees are too small.	The primary purpose of earth banks and trees are not for restricting lighting. Lighting will include downward directional lighting, specified to minimise the effects of potential spillage. Further details are included in the draft Lighting Strategy. Concerning the visual effect, the Proposed Development will not be completely hidden by trees; however, the existing conserved and new woodland, tree and other planting, in conjunction with the proposed mounding, will be effective in screening much of the lower and 'active' parts of the Proposed Development.	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
Concern that landscaping/grass banks will be insufficient/too low to lessen impact of noise pollution.	The earth bunds are substantial in height, and the mitigation effects are calculated in the noise chapter of the draft Environmental Statement. Where the bunds are insufficient, additional measures such as acoustic glazing are proposed.	N
General concerns about noise from the site: -includes noise from rail, HGVs, worker traffic and site operation.	The noise calculations undertaken for the Site include noise from: <ul style="list-style-type: none"> • Parking activity and staff car movements on internal site roads; • HGV and tug movements on internal site roads and in service yard areas; • Forklift activities in service yard areas; • Activities/processes within the proposed employment units; • Trains accessing the rail terminal and rail-served employment unit; 	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
	<ul style="list-style-type: none"> Activities at the rail terminal, including gantry cranes loading/unloading containers from HGVs and trains. <p>The results of the noise calculations are set out in the Environmental Statement (Document 6.2, Chapter 13).</p>	
Suggestion: provide triple not double glazing for nearby residential properties	FAL is providing a mitigation scheme on noise insulation, despite analysis showing that glazing is not required. This will further reduce the impact of the Proposed Development on the closest residents to the Site.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
Concern that 24-hour activity at the Site will adversely affect nearby villages	The Site has been chosen in part due to its limited potential impact on a major built-up area, whilst being close to the conurbation it would principally serve. The scale and exceptional relationship of the Site with major road and rail routes make it the only site suitable in the area to meet the need for an SRFI. FAL acknowledges that the Proposed Development nevertheless has the potential to impact those close to the Site, and has sought to address and minimise these potential impacts through appropriate mitigation measures, in accordance with NPS paragraph 4.86 and consistently with its own adopted vision for how the Proposed Development should be undertaken – see paragraph 1.2.2 of the Planning Statement (Document 7.1A, Paragraph 1.2.2).	N
Concern that local unemployment is low	The need for an SRFI in this location is the principal reason for the location of the Proposed Development; this is covered in detail in the Planning Statement (Document 7.1A, Section 5.2). However, the provision of local labour is a very important consideration - the job profile and number of jobs to be provided by	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	<p>the Proposed Development are a strong match for the skill profile and employment level within the defined Travel to Work Area (see the Planning Statement (Document 7.1A, Section 15.3)), and they will benefit the local economy as a whole. The provision of a substantial number of jobs at a wide range of skill and qualification levels is expected to have beneficial effects at a local level, and there is an established and demonstrable need for logistics in the area.</p> <p>Increased job opportunities would help to reduce the substantial amount of out-commuting currently occurring in South Staffordshire. Whilst unemployment is low, economic inactivity and the number of discouraged workers are still a local consideration, and this could be reduced by providing suitable local employment and training opportunities.</p>	
Concern that most jobs will be transferred in from other areas where people already work.	There is an established and demonstrable need for logistics in the area, and it will benefit the local economy as a whole. Displacement of existing economic activity is expected to be low (Document 7.1A, Section 16.3).	N
Concern job numbers are inaccurate.	A methodology is provided in the Statement of Economic Benefits (Document 7.1B).	N
Concerned that new workers may commit crime and disruption in the area.	FAL will not employ workers on site directly; the occupants and contractors at the Site would be the employers. Occupiers and contractors would have in place all the necessary legal measures required of them by English law and proportionate to their activities. FAL would also establish a Occupier and Contractor Charter and an Employment, Skills and Training Plan Framework, setting out best practice and obligations for employee training, support and conduct.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
Suggestion: FAL could engage local job seekers through offering training, direct advertising and hosting careers fairs.	FAL will establish an Employment, Skills and Training Plan Framework, which will aim to support as many local people as possible into work. This will include partnerships with local councils and job centres (including Job Clubs), and will target key local groups. FAL will establish partnerships with local training providers, suppliers and authorities who have established links in the community, and established means of advertising locally and informing local people about job and training opportunities.	N
Suggestion: build family friendly houses to attract younger workers to the area.	A detailed assessment of existing travel to work patterns (both by sector and by regional characteristics) has been undertaken, which has confirmed that no new housing would be required to accommodate workers at WMI. This work has included reviewing skill levels and qualifications within a reasonable travelling distance against the jobs that are anticipated to be provided by WMI.	N

Topic: Health		
Summary of responses	Regard to responses (section 49)	Change
Concern about the impact of the Proposed Development on residents' health including concerns about Asthma.	<p>The Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment, which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment, carried out for the Environmental Statement (Document 6.2, Technical Appendix 15.01). The air quality assessment considers potential emissions against recognised air quality standards.</p> <p>In addition, an assessment of the Proposed Development on human health can be found in the Environmental Statement Socio-Economic and Human Health (Document 6.2, Chapter 14). This assessment has shown there would be no increase in the number of receptor locations which exceed relevant human</p>	N

Topic: Health		
Summary of responses	Regard to responses (section 49)	Change
	health air quality objectives as a result of the Proposed Development and the Proposed Development does not introduce new receptors into a location of poor air quality. The impact of the scheme is not therefore considered to be significant in terms of human health.	
Suggestion that developers provide private health checks for impacts of increased pollution and noise levels.	The provision of health checks does not accord with standard guidance, as health can be affected by multiple variables. The Environmental Impact Assessment considers effects and identifies mitigation measures based on human health criteria. The results of the assessment can be found in Environmental Statement Socio-Economic and Human Health (Document 6.2, Chapter 14).	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
<p>A significant concern of many respondents was that congestion levels are already bad and road use is already high on the A5, A449, Station Road and other roads in the local area.</p> <p>As a result further concerns were about the suitability and the ability of local roads to cope with additional traffic</p>	An agreement was reached with Staffordshire County Council and Highways England, as the highway authorities, that the extent of the traffic to be modelled would be based on the South Staffordshire VISSIM model. As this is a strategic model, this focuses on the primary road network, during the busiest periods, which are the AM and PM peak hours. Where appropriate, inter-peak periods have been assessed, for example, at the intermodal terminal access, to show the effect this would have on the A449/Site access junction. This shows that with the Proposed Development, the volume of traffic in Station Road will decrease during the AM and PM peak periods, as set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 9). This can be attributed to the proposed banned right turn from the A449 into Station Drive, which will reduce inappropriate driving through Station Drive, Station Road, and	

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
	<p>Vicarage Road, and encourage through traffic to use the new A449/A5 Link Road.</p> <p>National guidance in the form of the Design Manual for Roads and Bridges sets out the traffic flow of capacity that can be achieved based on road types, and when compared to the 2021 traffic flow figures, which include the Proposed Development, they show that the A5, the A449 and Station Road will all operate within capacity.</p>	
General concern that road closures/incidents on M6/A449/A34/A5 divert traffic into local roads/cause gridlock.	From the modelling work undertaken and agreed with Staffordshire County Council and Highways England, the level of change associated with traffic from the Proposed Development through Penkridge to the Gailey roundabout is relatively low. This is shown in Document 6.2, Technical Appendix 15.01, Sub-appendix Q . WMI will be signposted on the strategic road network, to enable drivers to avoid Penkridge. In addition, as part of the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I), a key mitigation measure is to prevent HGVs from accessing WMI through Penkridge.	N
General concern about worsened congestion/traffic during the interchange's operational life.	Construction traffic will be heavily regulated by the Principal Contractor, with routing directions to WMI and time periods of delivery to avoid peak hours established. The Site Wide Construction Traffic Management Plan (Document 6.2, Appendix 15.01, Sub-appendix H) sets out the mitigation measures that are proposed, including routing in order to mitigate construction traffic.	N
Concerns that the traffic assessment did not include the construction phase and a long enough timeframe	The demolition and construction phase of the Proposed Development is not forecast to generate an increase in HGV traffic, which will necessitate a detailed assessment of the impact of the Proposed Development during the demolition and construction phase.	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
	<p>Construction traffic will be heavily regulated by the Principal Contractor, with routing directions to WMI and time periods of delivery to avoid peak hours established. A Demolition and Construction Traffic Management Plan (Document 6.2, Appendix 15.01, Sub-appendix N) sets out the mitigation measures that are proposed, including routing in order to mitigate construction traffic.</p>	
<p>General concern about 'rat-running' through local area</p>	<p>All visitors to WMI will be advised to use the main road network, which will be signposted accordingly. Local mitigation measures, including converting Crateford Lane to one way, and introducing a right turn ban from the A449 onto Station Drive, are proposed, to discourage the use of local roads and reduce the risk of potential strikes of the existing low bridge. Through traffic can transfer to the new A449/A5 Link Road (Document 6.2, Technical Appendix 15.01, Chapter 5), and the amount of traffic using Station Drive will therefore reduce as a result of the proposals. Chapter 9 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 9) sets out that there is no need for WMI traffic to pass through Calf Heath in order to access the Site, as Vicarage Road from the north provides a more expedient access route.</p> <p>In terms of Coven, the traffic modelling does not indicate that there will be a net increase of traffic volumes in the area, based on the Proposed Development, due to the location of Coven west of the A449.</p> <p>In addition to physical infrastructure works being set out, a Contingent Traffic Management Fund will be established, and funds can be spent if necessary by SCC on implementing local traffic measures, in the event that a specific need is</p>	Y

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
	identified. Details can be found in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 5).	
Concerns about making access more difficult for businesses and their customers along the A449	<p>Chapters 8 and 9 of the Transport Assessment (Document 6.2, Technical Appendix 15.01) demonstrate that the traffic associated with WMI can be accommodated on the local highway network, and it is not therefore expected that local trade would be affected by congestion on the road network resulting from WMI traffic.</p> <p>No access will be denied to local businesses. As part of the Demolition and Construction Traffic Management Plan (Document 6.2, Technical Appendix 15.01, Sub-Appendix N) appended to the Transport Assessment, information will be provided to local residents and businesses on construction updates, along with contact details of the site office should local residents or business have any queries on access.</p> <p>The diversion on the A449 is relatively minor, and no other concerns have been raised by the businesses. An assessment of the potential effects of the Proposed Development on businesses is presented in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14), in sections "Effects on existing businesses, organisations and clubs during construction" and "Effects on existing businesses, organisations and clubs during operation". It must be noted that some businesses will have improved access to the A5 and M6 via the new link road between the A5 and A449 included in the Proposed Development.</p>	N
Concern that the Proposed Development would result in an increase of	Traffic modelling work agreed with Staffordshire County Council and Highways England has been undertaken, and assessment of the surrounding road has been carried out within the Traffic Modelling Section (Document 6.2, Technical	N

Topic: Transport and access		
Summary of responses	Regard to responses (section 49)	Change
employee traffic and HGV vehicles	<p>Appendix 15.01, Chapter 8). The Transport Assessment demonstrates that, with the introduction of specific and tailored highway improvements, the highway network can accommodate the additional traffic associated with the Proposed Development.</p> <p>As part of the Site Wide Travel Plan (Document 6.2, Technical Appendix 15.01, Sub-Appendix H), WMI employees will be encouraged to use sustainable transport modes; this includes enhanced provision of local bus services, and the introduction of employee shuttle buses.</p>	
General comment that mitigation measures will not offset the negative impact of extra traffic.	Traffic modelling agreed with Staffordshire County Council and Highways England has shown that local roads are operating with additional available capacity; this can be found in Chapter 3 of the Transport Assessment (Document 6.2, Technical Appendix 15.01). Highways England and Staffordshire County Council have confirmed that, with the proposed mitigation, sufficient capacity exists on the highways network for the Proposed Development without causing delay or congestion.	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
Comment that Gravelly Way and associated private roads must be taken into account to ensure existing services and accesses are protected and not disrupted.	Gravelly Way and associated private road have been taken into account and access to existing services will be maintained as part of the Proposed Development.	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
Concern that the Masterplan does not address rail access.	The Site will have a rail link facing south and facing north, optimising the rail connection to the mainline.	N
Suggestion: have enough parking for 10,000 workers, and a bus service at peak times.	The car parking requirements for the scheme will be accommodated on individual warehouse plots. The parking ratios provided can be found within the Design and Access Statement (Document 7.5).	N
Suggestion: There was also a suggestion to include childcare facilities for the workers.	This will be taken into consideration as details of the project are developed.	N

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
Comment that no one would want to use the Community Parks owing to high pollution/poor air quality.	The Community Parks have been designed so that they are large enough to provide a considerable buffer away from the surrounding road network and the proposed Site roads. The perimeter landscaping comprising bunds and trees will also screen the parks from major roads. A number of successful parks of a similar nature and character have been established around industrial and employment sites, including the Country Park at Prologis Park, Coventry. Despite being in close proximity to industrial uses, they still provide accessible green spaces that can be used for walking and other passive recreational activities. They will provide alternative walking routes to the currently limited amount of available footpaths.	N
Comments that the existing community	The Community Parks are considered to be suitable in character, as informal and largely passive recreational areas that will fit appropriately into their landscape	N

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
facilities at the Site are adequate and that the rural nature of the area means the parks would be unnecessary. This included comments that Community Parks cannot replace green belt land.	context. Both Parks adjoin the canal corridor, and include existing trees and other planting that will be managed and extended with new planting. The new footpaths will provide alternatives to the currently limited number of nearby routes. The Community Parks will have key biodiversity functions, with opportunities to include more biodiverse habitats than currently exist in these areas.	
Suggestion: local people should be engaged in the planning and management of the parks. This included suggestions for the park, including: - Benches - Nice plants to look at - A place to walk the dog	A liaison committee, involving local representatives and dealing with a number of aspects of the Site, will be established. This will be secured by a requirement in the Development Consent Order. The two Community Parks will provide local access to over 44 hectares (109 acres) of open space, suitable for walking, cycling, running and other activities, which will be linked by new footpaths to the existing canal towpath. Attenuation swales and lagoons required for the Proposed Development will be located within the Parks and provide habitat for local wildlife. Additional information on the Parks has been included within the Design and Access Statement (Document 7.5).	Y
Request that the Community Parks are monitored by 24-hour security or a dedicated keeper to deter vandals and drug use. This included a suggestion that	If DCO consent is granted, the management and operations of the Community Parks and estate will be set out in relevant detail in the Reserved Matters application, and will include measures to deter crime through design and management. The Parks will be maintained by a management company set up to provide maintenance and security for the entire development. The long term upkeep of the parks will also be funded by FAL.	N

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
companies who use the hub pay a levy for upkeep of the facilities		
Community Parks may add to traffic congestion.	From the traffic modelling undertaken, traffic associated with the Proposed Development that passes the Community Parks is not predicted to be so severe to discourage use of the community park. Within the transport mitigation measures proposed in Chapter 15 of the Environmental Statement (Document 6.2), pedestrian and cycle facilities are proposed around the Community Parks, in addition to a network of Permissive Paths.	N
The trees and ditches along Woodlands Lane in the North section of the park should be maintained as they are.	The existing trees and any ditches alongside Woodlands lane in the south east of the Site (and eastern edge of the Calf Heath Community Park) will be maintained and managed as part of the Park, where these trees lie within the Site.	N
Comment that noise from the Proposed Development would reduce people's enjoyment and use of the Community Parks.	Some existing residents live near to the proposed Community Parks, and mitigation measures adopted for these residents (earth bunding) will mitigate noise in the Community Parks; the parameter plans illustrate extensive bunding near these Community Parks. In addition, the sensitivity of temporary, daytime Community Park users is less than residential receptors.	N
Comment that respondents perceived the community parks/benefits as a gesture to distract and mollify residents so that FAL could build the interchange.	FAL are committed to ensuring the impacts of the Proposed Development on the local community are minimised as much as possible. This includes the two Community Parks which are fundamental elements of WMI. They provide local access to over 44 hectares (109 acres) of open space suitable for walking, cycling, running and other activities which will be linked by new footpaths to the existing canal towpath.	Y

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
	<p>Stage 2a Consultation was carried out from 17 November 2017 to 2 January 2018 on a proposed extension of Calf Heath Community Park to extend public green space and to create a more cohesive environment linking with the Canalside and the rest of the Site.</p> <p>Attenuation swales and lagoons required for the Proposed Development will be located within the Parks and provide habitat for local wildlife. The Parks will be maintained by a management company established to provide maintenance and security for the entire development. Details of the community benefits can be found in the Planning Statement (Document 7.1A, Chapter 16).</p>	

Topic: Community Funds		
Summary of responses	Regard to responses (section 49)	Change
Comment that there would be no community benefits as these are outweighed by the impact of the project.	FAL are committed to ensuring the benefits of the Proposed Development outweigh any impacts. The Proposed Development will secure multiple benefits, and these are set out in the Planning Statement (Document 7.1A, Chapter 15). The Planning Statement (Document 7.1A), Market Assessment (Document 7.4) and Environmental Statement (Document 6.2) have clearly demonstrated that the benefits of the Proposed Development substantially outweigh the residual adverse effects, whilst the need for the Proposed Development is strongly established in principle in the NPS and specifically in this case through independent study as well as the Applicant's own assessment.	N
General comment to provide compensation.	The designs for the Proposed Development have included significant mitigation to ensure that the impact on local residents is addressed appropriately. Compensation arrangements are set out in the 'Compensation Code' based on legislation, case law and best practice. The relevant legislation provides that	N

Topic: Community Funds		
Summary of responses	Regard to responses (section 49)	Change
	those whose property will be directly affected by the Proposed Development through land take or the acquisition of new rights are entitled to compensation under the aforementioned 'Compensation Code'. FAL has worked closely with those affected landowners to negotiate compensation terms when appropriate. Any party who feels that they may have a claim for compensation is recommended to seek professional advice, and/or contact FAL, who will be happy to discuss their individual situation.	
General comment that the Proposed Development would have a negative impact on residents, local community and the area.	The Site has been chosen in part due to its limited potential impact on a major built-up area, whilst being close to the conurbation it would principally serve. The scale and exceptional relationship of the Site with major road and rail routes make it the only Site in the area suitable to meet the need for an SRFI. FAL acknowledges that the Proposed Development nevertheless has the potential to impact those close to the Site, and has sought to address and minimise these potential impacts through appropriate mitigation measures, in accordance with NPS paragraph 4.86 and consistently with its own adopted vision for how the Proposed Development should be undertaken; see paragraph 1.2.2 of the Planning Statement (Document 7.1A, Paragraph 1.2.2).	N

Topic: Property and land		
Summary of responses	Regard to responses (section 49)	Change
Concerns about a reduction in local property values	Whilst socio-economic factors have been taken into account in the development and refinement of the proposals, the effect on house prices as a result of the Proposed Development, as with all types of development, is not material to its planning merits.	N

Topic: Property and land		
Summary of responses	Regard to responses (section 49)	Change
Concern that traffic and train vibrations will damage people's houses.	The impact of noise is considered in Chapter 13: Noise and Vibration of the Environmental Statement (Document 6.2, Chapter 13).	N
Concern that homes and businesses will have to be destroyed to make way for the site or will be disrupted as part of the Proposed Development.	The Statement of Reasons (Document 4.1) contains detail on how each property is affected.	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
General comment that there was not enough detail provided in consultation documents, assessments and Environmental Statement.	The information and technical reports provided for statutory consultation (Stage 2) were highly detailed documents, which were the culmination of surveys and technical and development work in the time following the Stage 1 Consultation. As part of the development and pre-application process, it is normal for further work to be completed before Application submission, and FAL has undertaken this work for the submitted Application.	N
Complaint that communication/consultation with local residents has been inadequate including: - consultation period too short (11 days) - details hidden in ES not	In preparing for statutory consultation (Stage 2), FAL prepared a Statement of Community Consultation (SoCC) (Appendix K), which set out how FAL planned to consult, and this was reviewed and supported by both South Staffordshire District Council and Staffordshire County Council. When preparing the SoCC, FAL decided to undertake consultation for a period of 8 weeks between 5 July and 30 August 2017. The statutory minimum is 4	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
<p>in summary documents</p> <ul style="list-style-type: none"> - selective quotations of NPS - consultants unable to answer questions at meetings - consultation should have been wider. 	<p>weeks. FAL considered that the length of consultation was appropriate to accommodate the summer holiday period.</p> <p>Part of the SoCC identified a Consultation Zone, within which all residents received consultation information in the post. The zone was extended approximately 3km/1.9 miles from the Site boundary, with the extensions made to ensure villages or groups of houses were wholly included. This zone included the communities which were considered most likely to experience any impact from WMI.</p> <p>The consultation was widely publicised through editorial coverage in local papers, statutory notices, press advertising to promote access to information and public exhibitions, posters, local Information Points and via the WMI website.</p> <p>FAL has always been open about the level of information provided for consultation, and honest in acknowledging if answers to questions were not known at the time. During the Stage 2 Consultation, the team was aware that some further technical and development work was still required, and that in some instances, it would be unable to provide the information requested.</p> <p>The information and technical reports provided for the Stage 2 Consultation were highly detailed documents, which were the culmination of surveys, technical and development work following the Stage 1 Consultation. As part of the development and pre-application process, it is usual for further work to be completed before Application submission, and FAL has undertaken this work for its Application.</p>	

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
Comment that expected traffic congestion of minus 5% (-5%) between Gailey and the new roundabout is wrong.	The A449/A5 Link Road will provide an alternative route for traffic, increasing the resilience of the local highway network and reducing journey times and queue lengths at the Gailey roundabout. Traffic modelling work agreed with Staffordshire County Council and Highways England has been undertaken, and assessment of the surrounding road has been carried out. Chapter 9 of the Environmental Statement (Document 6.2, Chapter 9) sets out local journey times and journey times through Gailey roundabout, which have been modelled based on scenarios with and without WMI. Full traffic flow data is shown in Document 6.2, Technical Appendix 15.01 .	N
Comment that the traffic flow along the A449 Northbound will be increased by 41% rather than 10% as stated.		

10.5. Representation received after the deadline

10.5.1. The deadline for responding to Stage 2 Consultation was 30 August 2017. A small number of section 42 responses were received and accepted after this date. These were:

- Birmingham City Council
- Canal and River Trust
- Civil Aviation Authority
- Ministry of Defence DIO

10.5.2. These are included in the analysis of feedback provided earlier in this Chapter.

10.6. Conclusions

10.6.1. This Chapter of the report explains FAL's regard to consultation responses and is intended to fulfil the requirements under section 49(2) of the Act.

11. Stage 2 Consultation – responses received under section 47

11.1. Introduction

- 11.1.1. This Chapter reports on the responses to Stage 2 consultation under section 47 consultation with the local community, as well as Four Ashes Limited (FAL)'s consideration of the issues raised in the responses.
- 11.1.2. Section 49(2) of the Act requires FAL to have regard to relevant responses to the consultation and publicity that has been undertaken under sections 42, 47 and 48 of the Act. A relevant response for the purpose of section 47 is defined in section 49(3)(b) as a response to consultation under section 47(7) that is received by FAL before the deadline set out in the Statement of Community Consultation (SoCC). The deadline was 30 August 2017.
- 11.1.3. FAL acknowledges that there is a clear expectation that issues raised during consultation should be considered in determining and shaping the final Application. This Chapter demonstrates that FAL has acted reasonably in fulfilling its requirements under section 49 of the Act.
- 11.1.4. In total 628 responses to the consultation were received from members of the community including non-prescribed organisations.

11.2. Breakdown of total section 47 responses

- 11.2.1. The following table provides a breakdown of how people chose to provide feedback:

Table 13: Number of section 47 responses by format received

Response format	Number of responses received
Feedback Form responses via the consultation webpage	314
Feedback Form responses received by hand or by Freepost	207
Emails and letters	107
Total	628

11.2.2. The map below shows the geographical spread of section 47 consultation responses that provided address information as part of the Feedback Form.

Figure 9: Geographical spread of section 47 responses - local view

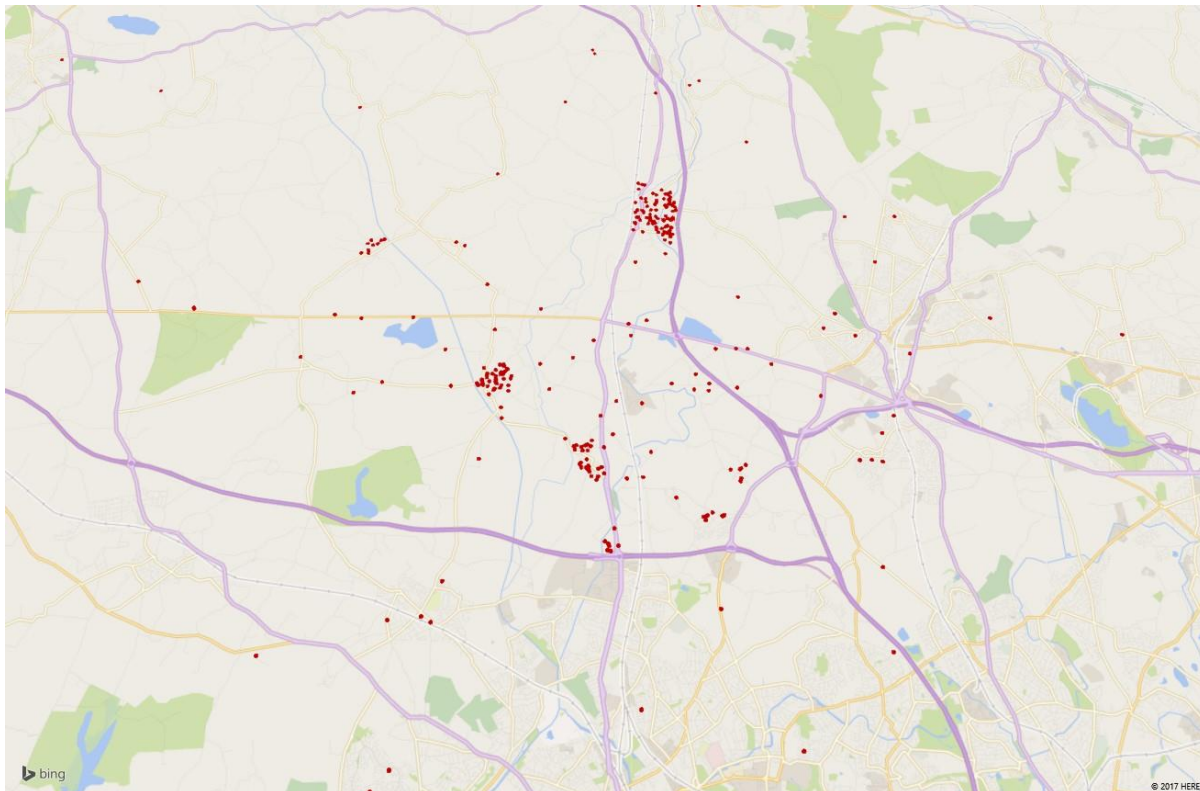


Figure 10: Geographical spread of section 47 responses - UK view

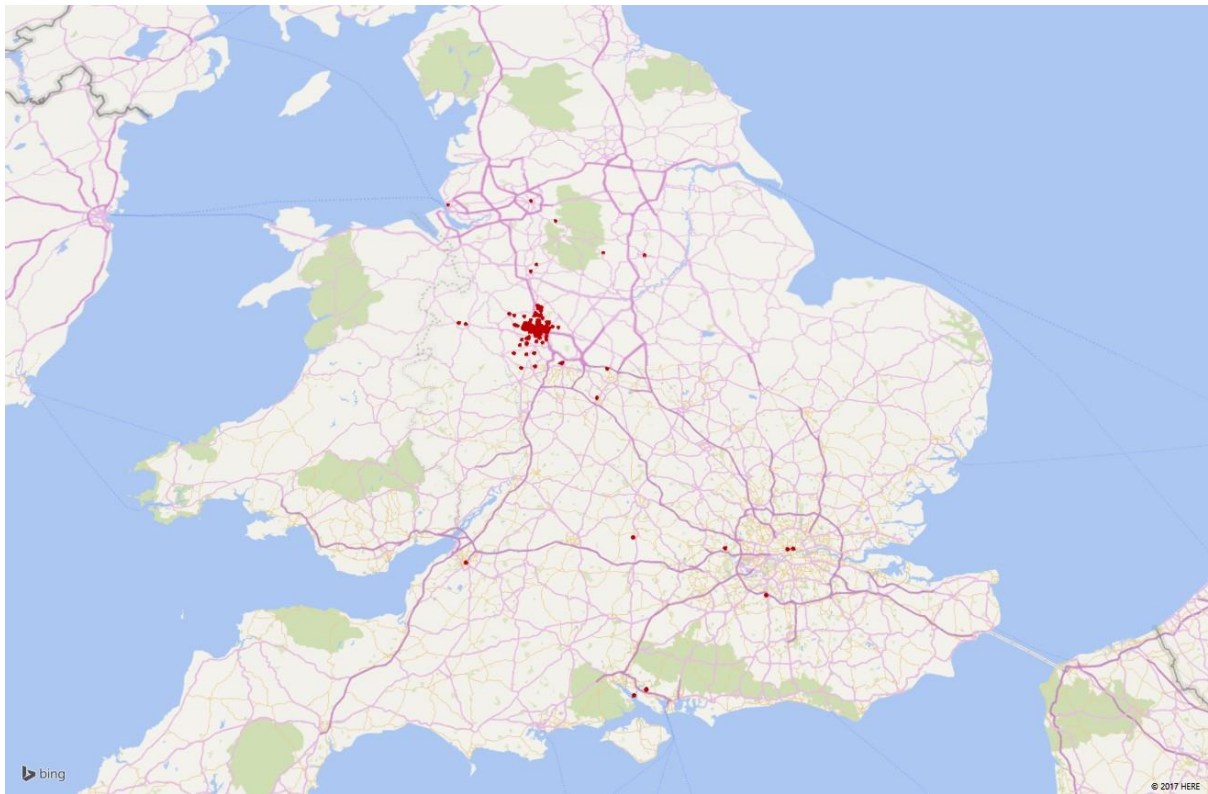
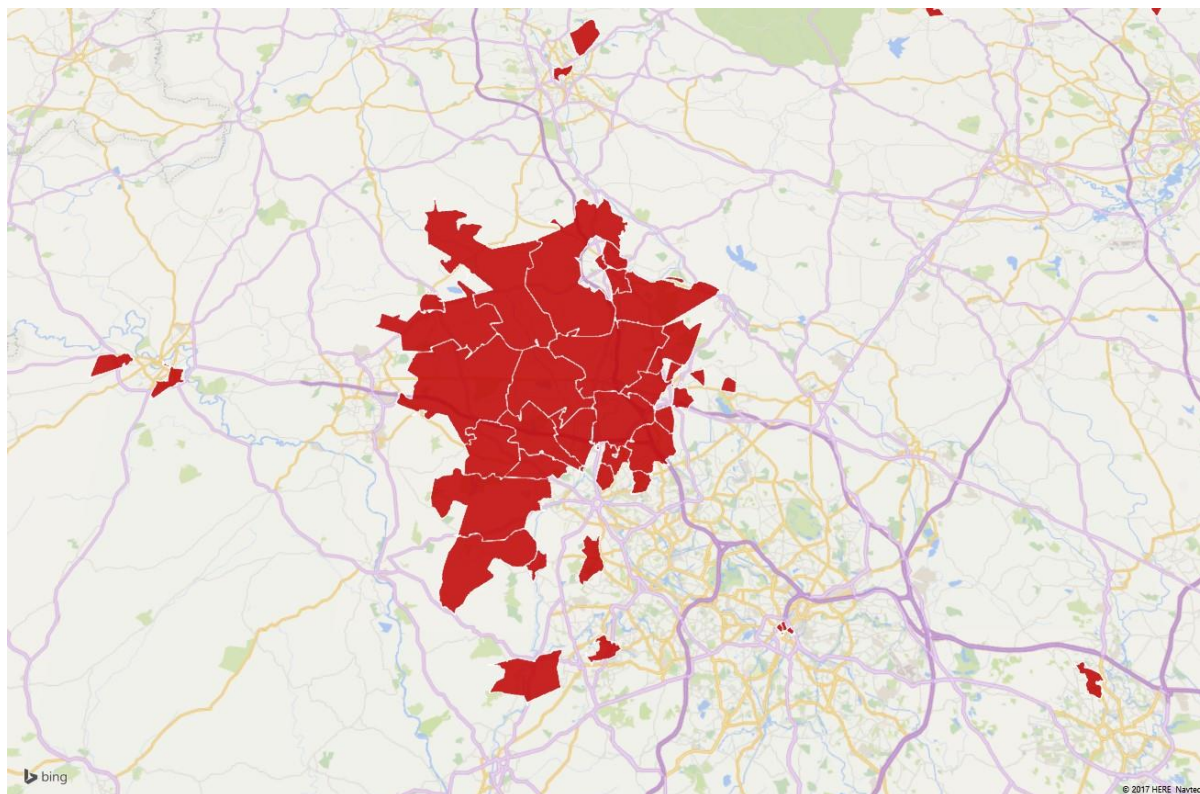


Figure 11: Postcodes covered by section 47 consultation responses - local view



11.3. Summary of public responses

Overview of issues raised

11.3.1. This section of the report is a summary of the key matters raised by the public, including organisations, in the Stage 2 Consultation. The analysis finds that opposition was the most common response, with concerns largely focusing on the Proposed Development's potential for exacerbating existing traffic problems and the loss of Green Belt land.

11.3.2. A summary of the issues can be found below. Table 13 provides FAL's regard to the issues raised in these responses.

Need for the Proposed Development and Alternative Sites Assessment

11.3.3. The majority of respondents questioned the need for a Strategic Rail Freight Interchange (SRFI) at the Site. Some respondents went on to raise concerns about the evidence provided to demonstrate market need for the Proposed Development.

11.3.4. A significant number of respondents questioned the conclusions of the Alternative Sites Assessment (**Document 7.2**) and instead

felt that better sites existed which could serve the need for an SRFI. Reasons for a preference for other sites included the brownfield nature of other sites, existing infrastructure at other sites and a population with high unemployment in the vicinity of the Site.

Comments on the suitability of the Site

- 11.3.5. The Site was largely argued to be unsuitable because of the existing traffic problems in the area, its classification as Green Belt land, and the potential for South Staffordshire to become part of the urban sprawl of the Birmingham conurbation.
- 11.3.6. There were many general comments that the Proposed Development would be better suited to a brownfield site as this would mean less disruption to wildlife and less disruption to residential properties as there would be a smaller surrounding population.
- 11.3.7. There was also general concerns about the scale of the Proposed Development, that it would be too large for the area. These concerns were linked to comments that the area would lose its rural character.

Comments on the Illustrative Masterplan

- 11.3.8. Specific comments were made about the Illustrative Masterplan including the provision of accommodation for Heavy Goods Vehicle (HGV) drivers, parking for workers and the location of warehouses.

Comments on Community Parks

- 11.3.9. Whilst the provision of Community Parks was welcomed by some the majority of respondents were concerned that they were unnecessary, would not be used and were simply a gesture to reduce opposition to the project.
- 11.3.10. There were a large number of comments that the existing community facilities are adequate and that the rural nature of the area means the parks would be unnecessary.
- 11.3.11. There were many comments about the location and practicality of the parks; being situated by road traffic and in an industrial setting caused many to believe they will not be used due to resulting poor air quality and noise. Their distance away from residential properties also led to the belief they would be little used. This led some to raise the concern that their distance from

populations would require people to drive to use them, further exacerbating traffic and air quality concerns.

- 11.3.12. There were a number of specific suggestions for additional park facilities including: accessible paths for wheelchairs and buggies; cycle tracks linking to minor roads; refreshment areas or cafes; a craft shop; a play area; a quiet area for the elderly; a dog-walking space; adequate parking; a wild flower meadow; ponds; picnic areas and crushed stone paths.
- 11.3.13. There were also a number of concerns about the security of the parks, with some believing they could facilitate drug-use, vandalism and anti-social behaviour.

Comments on a Community Fund

- 11.3.14. Some requested clarification about the Community Fund, including details about the amount and whether this would be a one-off or an annual contribution. The rest of the comments split roughly into two suggestion areas: compensation and infrastructure.
- 11.3.15. Compensation: There were some general comments regarding compensation which did not directly reference the Community Fund or what the compensation should look like. Those that were more specific suggested the Community Fund should be given as a lump sum to local residents as compensation for falls in property value, or to compensate for health impacts. Others suggested improvements to impacted homes in the area, like sound insulation, double glazing, and a warm homes initiative.
- 11.3.16. Infrastructure: There were some suggestions to use the Community Fund for material improvements in the area either to act as recompense for the impact of the Proposed Development or to offer a community benefit.

Comments on the canal-side environment

- 11.3.17. There were general concerns about the impact on facilities already in use by the community including the Canal and local footpaths. There were also more specific concerns that wildlife would not be adequately protected along the canal corridor; that noise will ruin tranquillity of the Canal setting; and the screening between the Site and the Canal is inadequate.

Comments on the job creation the Proposed Development would bring

- 11.3.18. The majority of responses in relation to jobs focused on the methodology for reaching the job creation figure for the Proposed Development. Many commented that there was no evidence for how the figure of 8,550 jobs had been calculated. This led to concerns for some that most jobs will be transferred in from other areas where people already work; some of the new jobs will be transient (for example construction workers) and that automation or technological change will reduce the number of workers needed.
- 11.3.19. There were also many comments highlighting the lower than average levels of unemployment in the area, and that there were no figures provided to demonstrate the need for jobs in the local area. This led to concerns that the jobs created by the Proposed Development would be filled by people outside of South Staffordshire ultimately leading to more issues.
- 11.3.20. Some suggestions were raised regarding improvements to public transport to the Site.

Comments on environment and mitigation

- 11.3.21. Most respondents expressed concern about some aspect of the environmental information and proposed mitigation provided as part of the Stage 2 Consultation. Concerns about specific environmental topics are set out below.

Air quality

- 11.3.22. Responses about air quality and air pollution were common and complex, most highlighting their concern about existing poor air quality and it being exacerbated by the Proposed Development.
- 11.3.23. There were many comments about air quality being already poor, with specific concerns about Gailey and Penkridge, leading to some concerns about existing high asthma levels. Concerns also stemmed from the existing air pollution due to the Site's location being surrounded by high traffic levels on motorways and local roads. The nearby rail line was also cited as an existing concern for air pollution.
- 11.3.24. There was also a comment highlighting that areas around the Site are already part of Air Quality Management Zones.

- 11.3.25. Many respondents were concerned that mitigation proposals for air pollution were not good enough, leading some to raise concerns about the health impacts of pollutants from commuter's cars, HGVs and trains. These included increased cancer risks (lung, breast and child cancer), respiratory illnesses (like asthma), eczema, general mental health, and diseases such as Alzheimer's and heart disease. The pollutants mentioned included CO₂, NO_x, particulates and PM₁₀s.
- 11.3.26. Some concerns were expressed about the lack of information surrounding current levels of air quality including requests for information on what the current statistics are, what research has been done and whether this will be shared with the public. From this, there was a request that pollution levels at schools in Penkridge be monitored.

Noise

- 11.3.27. Noise was a concern for some, with respondents highlighting the current noise levels in the area as unacceptable, and many believing it will become even more unacceptable if the Proposed Development goes ahead. Concern about road-based noise was more common than concern about trains or construction.
- 11.3.28. The source of these concerns was noise from trains, HGVs (including refrigeration HGVs), an increasing number of workers' cars, and construction works.

Visual impacts

- 11.3.29. Significant concerns were raised about the visual impact of the Proposed Development including the height of buildings, an unsuitable design for the countryside, and the potential impairment of views into and out of the Site.
- 11.3.30. Major concerns were raised about the impact of light pollution from the Site including concerns about 24/7 lighting.
- 11.3.31. Some respondents were sceptical about the effectiveness of trees in mitigating light pollution and the visual impact, due to the time taken to grow to a sufficient height and foliage density.
- 11.3.32. Suggestions were made that buildings should be set back, further away from the surrounding area and main roads, and should be separated by more green buffers to mitigate visual impact.

Wildlife and ecology

- 11.3.33. Concerns were raised that the mitigation proposals will be insufficient for protecting wildlife and nature.
- 11.3.34. Some respondents felt that insufficient detail was provided on the impact of the proposals on:
- Endangered and protected species;
 - Agricultural land;
 - Mature trees;
 - Fauna and flora;
 - Butterflies and bees.
- 11.3.35. Significant concerns were raised about the destruction of wildlife habitats for various species.

Property and land

- 11.3.36. Concerns were raised by some respondents about the negative impact of the Proposed Development on property values. Several respondents commented that the only individuals who stand to benefit are the landowners and shareholders of the Proposed Development.

Calf Heath Reservoir

- 11.3.37. A significant number of general concerns were raised about the impact of the Proposed Development on Calf Heath Reservoir. Many of these included comments that the environmental assessment was inadequate or should have considered Calf Heath Reservoir in more detail.
- 11.3.38. Major concerns were raised about potential negative impacts on Greensforge Sailing Club. Members and interested parties from Greensforge Sailing Club raised concerns over the effect of tall buildings on wind patterns and subsequent sailing activities on Calf Heath Reservoir. Some respondents felt that the Proposed Development was inadequately screened from Calf Heath Reservoir.

Impacts on local business

- 11.3.39. There were a small number of concerns that the Proposed Development would negatively affect specific local businesses.

Comments on transport and access

- 11.3.40. A significant concern for many respondents was that congestion/traffic is already bad and road use is already high on the A5, A449, Station Road and other roads in the local area.
- 11.3.41. Assessments and projections: Many responses claimed the traffic assessments were inaccurate or misrepresentative of the 'real' level of traffic in the area; this included complaints that not enough detail or evidence was provided in the traffic assessment.
- 11.3.42. Similar claims about traffic projections were made regarding inaccuracy and a lack of evidence and detail, and respondents were thus concerned about the potential for additional traffic, congestion or gridlock on local roads, such as the A5, A449 and access points for the M6 and M54.
- 11.3.43. Many respondents also suggested the traffic assessments and projections were neither impartial nor independent.
- 11.3.44. A significant number of respondents were concerned that mitigation measures will be insufficient or will not offset the negative impact of extra traffic. Some raised concerns that the proposed mitigation measures, such as the HGV ban through Penkridge, will not be enforced or effective
- 11.3.45. Specific concerns were also raised about the increase in traffic due to employees going to and from the Site and due to people travelling into the area to use the community facilities.
- 11.3.46. Many respondents were concerned about the effect of road closures or incidents on the M6, A449, A34 and A5 that might divert traffic into Penkridge and cause gridlock.
- 11.3.47. Further concerns were about the suitability and the ability of local roads to cope with additional traffic, these included:
- Safety concerns about increased accident risks due to extra traffic;
 - Concerns that local roads could be severely damaged by additional HGVs, and that the local authority would have to pay for their maintenance;
 - General concerns about the development reducing the amenity or quality of life of local residents.
- 11.3.48. Conversely, some respondents raised concerns that upgrading the roads to cope with increased traffic could result in damage to the

environment or that such upgrades and improvements would take too long and would negatively impact local residents.

11.3.49. A number of suggestions were made for mitigation measures including:

- Banning lorries from coming off the M54 at Weston to access the Site;
- Widening local roads;
- Building a dedicated access point onto the M6 motorway from the Site;
- Installing new traffic lights at dangerous junctions;
- Implementing road speed reduction and other traffic-calming measures;
- A secure parking and HGV rest area.

11.3.50. A small number of concerns were raised about the rail element of the scheme. These included the fact that FAL tenants will not be required to use the rail terminal and railway, that the existing West Coast Main Line (WCML) is already busy, at capacity and will not be able to cope with the additional rail freight, and that the Proposed Development could result in railway disruption for passenger services.

Consultation

11.3.51. There were a small number of comments on the consultation itself as follows:

- The consultation period was too short;
- The consultation was poorly advertised;
- FAL's team was unable to answer local questions at the public exhibitions;
- Reports were not accessible enough, for example links on the website were broken and there were no hard copies of technical documents to take away from the public exhibitions;
- The consultation should have been wider including a request that Cannock residents be included in the consultation.

11.3.52. There were a small number of comments on the consultation documents as follows:

- Many respondents were concerned that FAL did not appoint independent consultants to undertake, for example, the traffic assessment;
- Some complained that using estimates or preliminary information is not good enough;
- There were many comments that there was not enough detail provided in consultation documents, assessments and the Draft Environmental Statement;
- Some complained that the Draft Environmental Statement and Transport Assessment were inadequate and misleading, and included selective quotations of the National Policy Statement (NPS);
- A few respondents commented that details were hidden in the Draft Environmental Statement and not displayed in summary documents;
- Many respondents had concerns that problematic issues were deliberately ignored;
- Some respondents did not trust the reports in general.

Miscellaneous

11.3.53. A few respondents were concerned that the Proposed Development could encourage the import of cheap foreign goods.

11.3.54. Some respondents raised general, non-specific concerns about the nature of FAL's interest in the Site.

11.3.55. A petition was submitted by Rt. Hon. Gavin Williamson MP following the Stage 2 Consultation showing opposition to the Proposed Development. The poll on which the petition was based was undertaken prior to the start of the Stage 2 Consultation, during the General Election campaign. The poll therefore did not take account of the information released as part of the Stage 2 Consultation including articulation of the benefits of WMI or the changes made to the Proposed Development in response to feedback from the Stage 1 Consultation.

11.3.56. The key issues raised in the petition were:

- Concern about damage to the Green Belt;
- Concern about increased traffic flows;
- Concern about the impact on local residents; and
- Concern about the scale of the development.

11.4. Summary of organisation responses (non-prescribed)

11.4.1. Responses were received from 24 organisations (non-prescribed):

- All Local Cyclists;
- Blymhill and Weston Under Lizard Parish Council;
- Brewood Civic Society;
- Cheslyn Hay Parish Council;
- CPRE Staffordshire;
- Cranford Developments Ltd;
- Dunston With Coppenhall Parish Council;
- Essington Parish Council;
- Freight on Rail;
- Greensforge Sailing Club;
- Inland Waterways Association;
- Lapley Stretton and Wheaton Aston Parish Council;
- Penkridge Civic Society;
- Railfuture;
- Shareshill Parish Council;
- Staffordshire Badger Conservation Group;
- Staffordshire Chambers of Commerce;
- Staffordshire Wildlife Trust;
- Stop the Gailey Freight Hub;
- The New Hollies Limited;
- The Ramblers Association;
- The Royal Yachting Association;
- 1st Blackfords Sea Scouts;
- 37th Wolverhampton Sea Scout Group.

11.4.2. In the sections below, the principal issues raised by each consultee are summarised. Table 13 provides FAL's regard to the issues raised in these responses.

All Local Cyclists

11.4.3. The All Local Cyclists raised concerns surrounding traffic congestion and safety particularly on Station Road, Vicarage Road and Straight Mile.

- 11.4.4. The group suggests that in the Proposed Development, Vicarage Road should be widened, the speed limit reduced to 30mph, and that street lighting is put in place.

Blymhill and Weston Under Lizard Parish Council

- 11.4.5. Blymhill and Weston Under Lizard Parish Council made several comments including:
- Suggestion that nearby Bescot and Stoke already have better rail infrastructure from historical rail use whereas the West Midlands Interchange (WMI) would be a new build;
 - Concerns over traffic congestion and that the existing road network would need to be updated to cope with delivery;
 - Supporting the commitment for local jobs but highlighted that there were no nearby train stations or methods of public transport to the proposed Site;
 - 24/7 working would lead to increased levels of noise and light pollution, especially during the night;
 - Request for more detail regarding whether warehouses would be used by non-rail freight-related companies, highlighting recent HS2 route changes through this area.

Brewood Civic Society

- 11.4.6. Brewood Civic Society responded to the consultation to highlight that it is the policy of the Society to object to any development on Green Belt land.

Cheslyn Hay Parish Council

- 11.4.7. Cheslyn Hay Parish Council raised several objections to the proposals on the grounds of the loss of Green Belt, impact on local residents (specifically noise), air quality, a lack of environmental risk assessments, the traffic created by the Proposed Development and the potential for rat running through local communities. Concern was also expressed about the location and scale of the Proposed Development and that there had been no guarantee that all distribution warehouses would be used by the rail freight system. The Parish Council also considered that mineral excavation on the Site should be completed before any development is taken forward.

- 11.4.8. The Parish Council asked several questions about the Proposed Development including: whether it was part of a national initiative; whether it was linked to Pentalver; if the Proposed

Development would lead to the nationalisation of the M6 toll; the interaction with the proposed M54/M6 link road and HS2; if there was additional capacity on the rail line; if occupants would be required to use the rail terminal; how staff car parking was being handled; the area employees were likely to be drawn from; what pollution controls could be put in place; whether local housing needs will be affected and how traffic controls could be enforced.

CPRE Staffordshire

- 11.4.9. CPRE Staffordshire raised objections to the Proposed Development primarily on the grounds of the loss of Green Belt land. Concerns were also raised regarding scale, location and warehouse usage.
- 11.4.10. CPRE Staffordshire also requested additional evidence from Network Rail to show its support of the Proposed Development for up to 10 trains per day and whether trains would only be running at night.

Cranford Developments Limited

- 11.4.11. Cranford Developments Limited responded to the consultation in support of the Proposed Development, subject to the reassurance that new road measures would be put in place to prevent local traffic congestion.
- 11.4.12. It welcomed the opportunity to enhance and benefit the local area.

Dunston with Coppenhall Parish Council

- 11.4.13. Dunston with Coppenhall Parish Council raised objections to the suggested traffic control measures put forward in the Proposed Development. Concerns were also expressed regarding its scale and the loss of Green Belt land.

Essington Parish Council

- 11.4.14. Four consultation responses were received from members of Essington Parish Council. Two raised general concerns over location, resulting traffic problems, noise and air pollution, and vandalism. The Council requested information on how many jobs would be made available for local people.
- 11.4.15. Two responses highlighted that they did not have sufficient knowledge of the development to make meaningful comment.

Freight on Rail

- 11.4.16. Freight on Rail welcomed the Proposed Development and fully supported it based on the following grounds: job creation; road safety; regeneration benefits to the local area; reduction in traffic and environmental advantages in relation to reducing CO₂ emissions; noise pollution and improving air quality.

Greensforge Sailing Club

- 11.4.17. Seven consultation responses were received from members of the Greensforge Sailing Club. General concerns included visual impact, disruption to wildlife and local employment guarantees.
- 11.4.18. Club members highlighted their biggest concern surrounding the scale and proximity of the Proposed Development, particularly in relation to its effect on wind speeds, water levels and drainage at Calf Heath Reservoir where the Club is based.
- 11.4.19. The Club raised concerns about traffic congestion and the proposal to alter access on Vicarage Road which could result in additional distances to travel by members to the Club to Calf Heath Reservoir.
- 11.4.20. Several responses suggested that a non-Green Belt site, such as Rugeley Power Station or Bescot Station, be used instead.

Inland Waterways Association

- 11.4.21. The Inland Waterways Association considered that some improvements have been made to the Proposed Development following the Stage 1 Consultation. However, they raised several objections to the Proposed Development. The Association had concerns, including: development on Green Belt land; size and location of the development; that the Proposed Development is not a 'rail interchange'; traffic congestion; and that transportation claims are not credible.
- 11.4.22. Specific concerns regarding the impact on the Staffordshire and Worcestershire Canal included: damage to the rural setting and heritage of the Canal; tourism value; the visual impact of the Proposed Development and proximity to the Canal; noise impact; and potential impact on Calf Heath Reservoir.

Lapley Stretton and Wheaton Aston Parish Council

- 11.4.23. Lapley Stretton and Wheaton Aston Parish Council raised concerns surrounding traffic congestion and local community groups being

potentially affected by the Proposed Development, particularly The Ramblers Association and Greensforge Sailing Club.

- 11.4.24. The Council also suggested that there were more appropriate SRFI Sites available and that Brownfield land and dual-rail access should be prioritised.

Penkridge Civic Society

- 11.4.25. Two responses from Penkridge Civic Society raised general concerns surrounding the Proposed Development highlighting location, the loss of Green Belt land, impacts on traffic congestion and road networks, noise and air pollution, the effect on local residents and property values.
- 11.4.26. Suggestions were made that a brownfield site should be identified for the SRFI instead.

Railfuture

- 11.4.27. Railfuture responded to the consultation in favour of the Proposed Development. Concerns were raised that the hinterland for container storage available to the rail terminal would be insufficient to service the demand.

Shareshill Parish Council

- 11.4.28. Shareshill Parish Council's primary concerns were about a proposed new roundabout located to the south of the Proposed Development on Vicarage Road and the resulting levels of traffic this would generate.

Staffordshire Badger Conservation Group

- 11.4.29. After the Stage 2 Consultation deadline for responses, FAL received an email via South Staffordshire District Council from the Staffordshire Badger Group. Ecological survey information was sent to the Group at its request.
- 11.4.30. A response was subsequently received from the Group commenting on the survey information stating it was happy with all findings and recommendations. This included road improvements featuring safe crossings for mammals and badger surveys at regular intervals through the development process. The Group would like to see Site management measures included as planning conditions and as part of advice from WMI in Site induction documents to ensure:

- Trenches and ditches have escape slopes built in or fitted at the end of each working day;
- Drainage or sewage pipe-work 150mm diameter, or over, is blanked off at the end of each working day;
- Workers on the Site are advised not to handle badgers that become trapped or fall victim to Site conditions;
- Call out details of experienced badger rescue worker(s) are included. (Note: Staffordshire Badger Group requested its details are kept on file as experienced badger rescue workers).

Staffordshire Chambers of Commerce

- 11.4.31. Staffordshire Chambers of Commerce raised concerns about the Proposed Development including: the location; loss of Green Belt land; effect on property/land value; traffic congestion and employment opportunities not being served by the local workforce.
- 11.4.32. Staffordshire Chambers of Commerce suggested the Ceramic Valley Enterprise zone, Chatterley Valley, Stoke-on-Trent could be considered as an alternative location for the Site, with upcoming rail developments into Stoke-on-Trent making this area more viable.
- 11.4.33. It supported FAL's pledge to secure long-term maintenance of public land and the creation of new Community Parks, but questioned the need for new parks due to only a small population nearby.
- 11.4.34. It was also suggested that the support of local firms through the supply chain process and procurement should be further considered.

Staffordshire Wildlife Trust

- 11.4.35. Staffordshire Wildlife Trust raised several objections to the Proposed Development, primarily based on ecological concerns. This included the likely loss of biodiversity and the residual negative impacts to important habitats and species.
- 11.4.36. Staffordshire Wildlife Trust also requested further ecological survey work to be completed, including the consideration of other habitats and Sites of Special Scientific Interest (SSSIs) in the area, and recommended a full Biodiversity Action Plan for the Site. It also highlighted the need to consider access and community issues.

Stop the Gailey Freight Hub

- 11.4.37. Stop the Gailey Freight Hub raised concerns about the Proposed Development including: the size and location; its impact on air and noise pollution; its impact on already congested major roads and the effect on the local environment and people.

The New Hollies Limited

- 11.4.38. The New Hollies Limited welcomed the Proposed Development highlighting the good location of the Site in fitting in with the surroundings.
- 11.4.39. Considerations were raised for more secure parking to be put in place for HGV and Large Goods Vehicle (LGV) drivers to prevent traffic pressure and to provide good welfare for those using the Site. It was also noted that new Community Parks and methods of public transport would be welcome alongside the development.

The Ramblers Association

- 11.4.40. Two consultation responses from The Ramblers Association raised general concerns about the Proposed Development, including: development on Green Belt land; location; lack of public transport to the Site for job opportunities; traffic congestion and the effect on air pollution.
- 11.4.41. The Ramblers Association requested that local ecology, biodiversity and parks are considered and that new footpaths are put in place. It was also suggested that considerations are made towards using sustainable energy and energy-efficient practices at WMI.

The Royal Yachting Association

- 11.4.42. The Royal Yachting Association raised concerns about the impact of the Proposed Development on the local Greensforge Sailing Club.
- 11.4.43. This included the impact that a change in wind patterns would have on sailing activity and concerns over ecology in the surrounding area.

1st Blackfords Sea Scouts

- 11.4.44. 1st Blackfords Sea Scouts raised concerns surrounding the impact of the Site on the Greensforge Sailing Club and its future.

11.4.45. It noted that the impact of the Proposed Development on wind levels, specifically at Calf Heath Reservoir where the Club is based, has not been fully addressed.

37th Wolverhampton Sea Scout Group

11.4.46. 37th Wolverhampton Sea Scout Group expressed its concerns about the Proposed Development and its impact on the Greensforge Sailing Club and its future.

11.4.47. Concerns included: alterations in wind patterns; travel times due to the closure and redirection of the current route from Stafford Road to Station Road; traffic congestion and air pollution.

11.5. Approach to feedback analysis

11.5.1. In line with the Department for Communities and Local Government (DCLG) Guidance, the relevant issues raised from responses have been summarised, considered and responded to. In order to capture and summarise each relevant issue from feedback, the following process has been used:

- 1) The issues within the first response to the Stage 2 Consultation are summarised by theme.
- 2) Each piece of feedback is then reviewed in turn.
- 3) When reviewing a piece of feedback, if an issue has already been listed from earlier feedback, it is recorded that the issue was mentioned again.
- 4) Any variations to the previously listed issue is incorporated into an updated summarisation where possible.
- 5) Where highly technical/detailed points have been made, rather than attempt summarisation, reference back to the full feedback for consideration by a specialist may be necessary.
- 6) This process creates a thorough list of summarised issues.
- 7) The summarised issues are sorted into categories and entered into a table.
- 8) FAL's team considers all the summarised issues. Where possible, changes are made to the Proposed Development. If changes are not made a justification for this is provided.

11.6. Regard to issues raised by section 47 consultees

11.6.1. The following section of this report includes a summary of all the issues raised in feedback to consultation under section 47, confirmation of whether the issue led to a change in the Proposed Development, and details of FAL's consideration of the issue.

- 11.6.2. The 'Change?' column in the tables refer to whether or not the comment or issue summarised led to a change in the Application.
- 11.6.3. There is a slight variation to the suggested table contained in the Annex to the Planning Inspectorate's Advice Note Fourteen; the columns "Date consulted" and "Response deadline" have been removed to reduce repetition. This is because those dates are the same for all consultees. The "date consulted" is 5 July 2017 and the "response deadline" was 30 August 2017.
- 11.6.4. It is important to note that as with any analysis of text-based feedback, there is likely to be a difference of opinion on how certain elements are interpreted or summarised. In addition, to avoid duplication cells have been combined where the regard to responses is the same.

Table 14: Summary of section 47 responses and consideration, by topic

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
General opposition to the scheme, questioning the need for a SRFI.	<p>FAL is committed to delivering a rail-served development which will bring significant sustainable social and economic benefits to South Staffordshire, the Black Country and the wider region, through responsible design and by taking into account community interests and environmental considerations.</p> <p>It is considered that the Site is uniquely situated to meet the long-outstanding need for a large-scale SRFI in this area.</p> <p>The provision of the major infrastructure provided by the Proposed Development has the ability to make a significant contribution to help realise the economic potential of the region.</p> <p>The careful design and assessment of the Proposed Development has ensured it has evolved to respond sensitively to the characteristics of the surrounding area and, in particular, to limit and mitigate their effects, as required by the National Policy Statement (NPS).</p> <p>The benefits of the Proposed Development substantially outweigh the residual adverse effects, whilst the need for the development is strongly established in principle in the NPS and specifically in this case through independent study as well as FAL’s own assessment.</p>	N
General concerns about the need case for a SRFI in this location.	<p>A full summary of the need for an SRFI is set out in the Planning Statement (Document 7.1A, Chapter 5).</p> <p>A compelling need for an expanded of SRFIs across the country is firmly established in the National Networks NPS. The relevant regional evidence base</p>	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	<p>also identifies a specific need for a new Regional Logistics Site (RLS) / SRFI in the West Midlands region as far back as 2004. There are currently no new known, proposed or planned SRFIs in the West Midlands and the shortage of available warehouse floor space is only getting more severe.</p> <p>The need identified by an independent study has been confirmed by the Market Assessment (Document 7.4) which accompanies this submission. It is demonstrated in the Market Assessment (Document 7.4) that there is an extraordinary scarcity of supply of suitable logistics facilities and locations. This scarcity of land is a serious threat to the continued prosperity of the region and the recognised need for a SRFI facility in the West Midlands has gone unmet since 2004.</p>	
<p>General comments that existing SRFIs are not being used and questioning the need for a new SRFI.</p>	<p>In terms of SRFI's that have been approved or consented, the following list provides an update on progress. DIRFT 1 and 2 are fully developed out. Land assembly and development areas have been taken forward at DIRFT 3. Rossington iPort has completed its rail terminal and successfully developed phase one warehousing units. London Gateway has carried out the rail terminal development and phase one of its warehousing development. The SRFI approved at East Midlands Gateway in 2017 has progressed as expected.</p> <p>Some existing rail freight interchanges, such as Telford International Rail Freight Park, are underutilised. However, it is considered that Telford International Rail Freight Park has failed to establish itself as a viable rail freight terminal and is not strategically located because it is in <i>"too peripheral a location to attract any significant large-scale distribution development in the future"</i> (West Midlands Regional Logistics Study Stage One, 2004). It is located on a lower gauge rail line and does not have sufficient scale and warehousing to be attractive to the</p>	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	market and to secure the frequency of trains necessary to achieve a high quality rail-served centre for distribution.	
Concerns were raised that the evidence provided to demonstrate market need for the scheme is based on estimates and predictions and not real numbers, casting doubt for some on the market demand for the scheme.	The Market Assessment (Document 7.4, Chapter 6) analyses in detail existing and upcoming land supply along with forecasted market demand from the scale of occupiers who would be attracted to this site. This, inevitably, is based on previous and current take-up in order to provide robust forecasts. It is also based on a thorough understanding of the structure of demand and the ongoing structural changes in the distribution and logistics sector.	N
Comment that the methodology used in the Alternative Sites Assessment is flawed, is unclear or is not transparent	FAL's team endeavoured to be as transparent and fair as possible when undertaking the Alternative Sites Assessment (Document 7.2). The method used in the assessment reflects the planning policy requirements and the specific operational and locational needs of an SRFI. The widest reasonable search area for alternative SRFI Sites was utilised and, at every opportunity, the Alternative Sites Assessment adopted a comprehensive and inclusive methodology, including creating an extensive search area, setting a low SRFI Site size threshold of 60ha and considering SRFI Sites which are up to (and, in two cases, beyond) 5km from the strategic road and rail network. The analysis of the SRFI Site constraints and opportunities have been undertaken by professionals and the findings have been fully set out in the Alternative Sites Assessment. The Alternative Sites Assessment has demonstrated that, even when utilising a search methodology which goes beyond what an operator would normally consider reasonable, there are still no suitable alternative locations to the Site.	N
Suggestion for alternative SRFI Site: Cannock	As part of the Alternative Sites Assessment (Document 7.2), a Site at "Mid Cannock Colliery/Poplars Landfill Site" was identified as a potential alternative.	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	<p>However, following detailed analysis of the Site's constraints and opportunities, it was determined that the infrastructure requirements to achieve rail access detracts from the Site's ability to accommodate an SRFI. In addition, its topography due to its use as landfill would undermine the ability to provide an SRFI in this location. For these reasons, the Site was discounted.</p> <p>A separate scheme is progressing for a road/rail freight interchange at a Site west of the A460 (opposite the Mid Cannock Colliery/Poplars Landfill Site identified in the Alternative Sites Assessment). Whilst this scheme would allow the transfer of freight between road and rail, it is not of the scale of an SRFI and would serve a different function in the logistics market.</p>	
Suggestion for alternative SRFI Site: Bescot	<p>The Bescot Rail Siding Site is considered in the Alternative Sites Assessment (Document 7.2). The Bescot Site is limited in the available land, below the 60ha fundamental criteria, which rules it out as an appropriate alternative SRFI Site. Also, whilst this Site is within 5km from a motorway junction, access to Junction 9 of the M6 requires traveling approximately 3.5km along the A4031 and A4148. This would require travelling through built up and residential areas that would not be suitable for HGV traffic. Finally, a significant portion of the Site is allocated by the Sandwell Local Plan for residential development and community open space.</p> <p>On this basis, Bescot Rail Sidings is not considered to be a suitable or appropriate alternative SRFI Site.</p>	N
Suggestion for alternative SRFI Sites: Telford (Donnington), Crewe,	<p>A search area was created as part of the Alternative Sites Assessment (Document 7.2) within which a need exists for an SRFI and it is appropriate to search for SRFI Sites that could potentially meet that need. Telford (Donnington), Crewe and Coventry do not form part of the search area for an</p>	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
Coventry, UK Central (Solihull)	SRFI development and SRFI Sites which are located beyond the search area are not considered to be suitable alternatives. This is because they would not meet the demands of the Wolverhampton/Birmingham conurbation or needs of the distribution industry in the Black Country and southern Staffordshire.	
Suggestion for alternative SRFI Site: Rugeley Power Station	Rugeley Power Station has been identified and analysed as a potential alternative site in the Alternative Sites Assessment and was included on the short list of potential alternative sites, however, the site was discounted on the basis that the links to the strategic road network are not suitable for an SRFI facility. In addition, whilst the site is not yet formally designated for residential use, it is being considered for contributions to meeting the future housing needs. A portion of the site may be available for employment development; however, it is unlikely to be at the scale required to meet the current SRFI demand. Please refer to the Alternative Sites Assessment (Document 7.2, Section 8.7) for further details.	N
Suggestion for alternative SRFI Site: Sites in Wolverhampton/Black Country	A comprehensive review of planning policy, field study and map search confirmed that there are no Sites within the Black Country of a sufficient size to potentially accommodate a SRFI. The established built-up nature of the Black Country (particularly along the existing rail lines) means that there are no unbuilt or unallocated Sites of over 60 ha. More details can be found in the Alternative Sites Assessment (Document 7.2).	N
Suggestion for alternative SRFI Site: Featherstone Army Base	The former Royal Ordnance Site at Featherstone has been identified and analysed as a potential alternative Site in the Alternative Sites Assessment (Document 7.2) and was included on the short list of potential alternative SRFI Sites. However, this Site was discounted as a result of difficulties in achieving rail access, which undermines the Site's suitability. It was also discounted due to the close proximity of a relatively large number of residential properties, which represents a significant constraint to the successful operation of rail facilities.	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	The size and shape of the Site plus the likely route of any rail link would create a very inefficient layout reducing capacity and decreasing Site development. Please refer to the Alternative Sites Assessment (Document 7.2, Section 8.6) for further details.	
Suggestion for alternative SRFI Site: Stoke-on-Trent (including Etruria)	Sites within Stoke-on-Trent would serve a different catchment area and would not meet the demands of the Wolverhampton/Birmingham conurbation or needs of the distribution industry in the Black Country and southern Staffordshire. Nevertheless, Etruria Valley is currently in the process of being developed and sufficient land is not available, even if Stoke-on-Trent was included within the search area.	N
Suggestion for alternative SRFI Site: Meaford power station, with a new link road and M6 junction	The former Site of the Meaford Power Station was identified as a potential alternative SRFI Site as part of the Alternative Sites Assessment (Document 7.2). However, the Site was discounted because it was considered to be isolated from the Wolverhampton/Birmingham conurbation market, requiring significantly greater HGV travel to serve demand than the Proposed Development, thereby undermining its ability to deliver sustainable transport objectives. It is also noted that a Development Consent Order has recently been granted on the Site for a power station which would prohibit an SRFI at the Site. On this basis, the Site was not considered to be a genuine alternative.	N
Suggestion for alternative SRFI Site: i54 (UK technology-based business park) location	The i54 Site and surrounding area was assessed as part of the Alternative Sites Assessment (Document 7.2) process. However, at an initial stage, the Site was discounted as a potential alternative because there was not sufficient available land to accommodate an SRFI facility. It is also noted that the infrastructure requirements to achieve rail access to the Site would, in any event, detract from the Site's ability to accommodate an SRFI.	N
Suggestion for alternative SRFI Site: Creswell	Creswell has been identified and analysed in the Alternative Sites Assessment (Document 7.2) and was included on the short list of potential alternative SRFI	N

Topic: Need case and alternative sites		
Summary of responses	Regard to responses (section 49)	Change
	Sites. However, the Site was discounted as a result of the combined effects on the River Sow from hydrology and ecology, and the combined constraints from topography and the river corridor. Further landscape and visual, transport and flooding impacts were also identified. Overall, the environmental constraints for the Creswell Site were assessed as High. Please refer to Alternative Sites Assessment (Document 7.2, Section 8.9) for further details.	
Suggestion for alternative SRFI Site: Dunston	Dunston has been identified and analysed in the Alternative Sites Assessment (Document 7.2) and was included on the short list of potential alternative SRFI Sites. However, the Site was discounted as a result of impacts on the landscape, cultural heritage and the existing watercourse, Pothooks Brook, as well as the secondary impacts on the ecology and hydrology would be challenging to mitigate and present significant constraints at the Site. Major engineering such as realignment or culverting of the Brook would be required. The combined impacts on this rural Site, as well as the effects on local amenity, are considered to make it unsuitable and is not considered to be an acceptable location for an SRFI. Please refer to Alternative Sites Assessment (Document 7.2, Section 8.8) for further details.	N
Suggestion for alternative SRFI Site: Next to HS2	HS2 has confirmed that the 400 km/h high-speed railway is not being designed to accommodate 120 km/h freight trains as would serve the Proposed Development. The role of HS2 as defined by the Government is to release capacity on the existing rail network to enable radical improvements to passenger and freight services.	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
Concerns that the proposal does not meet the proper legal requirements to develop on Green Belt land, that it would be inappropriate development on the Green Belt, or that no evidence has been provided of the special circumstances needed to justify development in the Green Belt.	The Site lies within Green Belt land and there is, therefore, a requirement to demonstrate that very special circumstances exist to justify inappropriate development. As set out in the Planning Statement (Document 7.1A), very special circumstances are considered to exist and the absence of alternative SRFI Sites in the search area mean that national policy objectives clearly expressed in the NPS to meet the compelling need for a network of large scale strategic rail freight interchanges will not be met unless Green Belt development is permitted in principle. In this context, the NPS recognises that, due to the geographic requirements of SRFIs, promoters may find that the only viable SRFI Sites for meeting the need for regional SRFIs are on Green Belt land Planning Statement (Document 7.1A, Paragraph 4.2.17).	N
Suggestion: alternative brownfield SRFI Sites should be used instead of Green Belt.	The Alternative Sites Assessment (Document 7.2) considers all SRFI Sites and possible locations for a Strategic Rail Freight Interchange, exploring the extent to which alternative SRFI Sites could meet the need which has been identified. The Alternative Sites Assessment explores whether or not this identified need can be met without the use of Green Belt land and on brownfield land. It is clear from the Alternative Sites Assessment that the key criteria for an SRFI facility, principally the need to efficiently link to both the national road and rail networks, greatly restricts the SRFI development opportunities within the search area. Whilst theoretical locations for SRFIs have been identified, it is clear that, apart from West Midlands Interchange, there are no brownfield SRFI Sites within the search area which represent genuinely suitable locations for a Strategic Rail Freight Interchange development.	N
The Site was largely argued to be unsuitable	A comprehensive traffic model has been developed and agreed with the highways authorities (Highways England and Staffordshire County Council). The	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
because of the existing traffic problems in the area.	model covers current levels of traffic and predicted levels of traffic during construction and operation of the Proposed Development. A Transport Assessment (Document 6.2, Technical Appendix 15.01) has been undertaken and submitted as part of the Development Consent Order (DCO). This demonstrates that with the introduction of mitigation measures proposed the highway network can accommodate the additional traffic associated with the Proposed Development.	
Concern about loss of agricultural land and subsequent issue of food security.	<p>The NPS requires Applicants to “take into account the economic and other benefits of the best and most versatile agricultural land” and to “seek to use areas of poorer quality land in preference to that of higher quality.”</p> <p>The Site consists of grassland and arable land, with some woodland, with around 59% of the Site categorised as between Grade 2 (Very Good) and Grade 3a (Good) agricultural land (see Planning Statement (Document 7.1A, Section 7.3) for further details). There is no Grade 1 (Excellent) agricultural land at the Site.</p> <p>The presence of Grade 2 and Grade 3 agricultural land at the Site is to be expected, as these grades of agricultural land are widespread in the district and the ASA has confirmed that there are no alternative SRFI Sites which could meet the need for a SRFI.</p> <p>Appropriate brownfield land is not available and the Site’s location and nature means that the permanent loss of agricultural land is inevitable. The significant benefits that would arise as a result of the Proposed Development outweigh the</p>	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
	impacts of the loss of a not uncommon resource in this location and would not be expected to impact on food security.	
<p>Concern about loss of rural character and urbanisation of the Site.</p> <p>Concern that the SRFI Site is too close to residential areas.</p>	<p>The Site is surrounded and intersected by a number of urban and industrial influences, including the A449, the A5, the M6, the West Coast Main Line, the Staffordshire and Worcestershire Canal, Calf Heath Reservoir, the Four Ashes Industrial Estate, the SI Group Chemical Plant and the Calf Heath Quarry.</p> <p>Also adjacent to the Site boundary is the Veolia Energy Recovery Facility, the Severn Trent Sludge Disposal Centre and the Gestamp stamping factory to the south, with the Rodbaston Wind Farm approximately 1km to the north.</p> <p>The Order Limits proposed for WMI fall within this heavily urbanised and industrialised area, with a strong landscape and green infrastructure strategy proposed as part of the scheme to ensure that the impact of the Site on the surrounding landscape will be minimised.</p> <p>The majority of the countryside surrounding the WMI Site lies within the Green Belt, and therefore no further development will come forward on the land surrounding the Site unless very special circumstances are demonstrated to exist to justify inappropriate development.</p> <p>The Planning Statement (Document 7.1A) sets out how the Proposed Development has sought to minimise and mitigate its potential impacts on the local area, including the residential amenity of those in close proximity to the Site. The continual refinement of the Proposed Development has been driven by seeking to minimise the potential impacts of WMI on the local community.</p>	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
	The Site has been chosen in part due to its limited potential impact on a major built up area, whilst being close to the conurbation it would principally serve. The scale and exceptional relationship of the Site with major road and rail routes make it the only site suitable in the area to meet the need for a SRFI. FAL acknowledge that the Proposed Development nevertheless has the potential to impact those close to the Site and has sought to address and minimise these potential impacts through appropriate mitigation measures, in accordance with NPS paragraph 4.86 and consistently with its own adopted vision for how the WMI development should be undertaken – see Planning Statement (Document 7.1A, Paragraph 1.2.2).	
The Site is too large, it should be smaller.	The issue of scale is addressed in detail in the Planning Statement (Document 7.1A, Section 5.4). The Proposed Development is a direct response to the scale of the unmet need for rail-served warehousing in the north-west of the West Midlands. The proposals would be of sufficient scale to be attractive to the market and to secure the frequency of trains necessary to achieve a high quality rail-served centre for distribution. This would enable significant modal shift away from exclusively HGV based distribution, which is characteristic of the area.	N
Suggestion: only build to the west of Vicarage Road.	The Proposed Development in Zone A7 (as shown on the Development Zone Parameter Plan (Document 2.5)) is critical to the overall proposal and reducing the size of the Proposed Development is not considered to be appropriate or feasible.	N
The Proposed Development would be better suited to a brownfield Site as this would mean less disruption to wildlife and	The Alternative Sites Assessment (Document 7.2) considers all SRFI Sites and possible locations for a Strategic Rail Freight Interchange, exploring the extent to which alternative SRFI Sites could meet the need which has been identified. The Alternative Sites Assessment (Document 7.2) explores whether or not this identified need can be met without the use of Green Belt land and on brownfield land.	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
less disruption to residential properties as there would be a smaller surrounding population.	<p>It is clear from the Alternative Sites Assessment (Document 7.2) that the key criteria for an SRFI facility, principally the need to efficiently link to both the national road and rail networks, greatly restricts the SRFI development opportunities within the search area.</p> <p>Whilst theoretical locations for SRFIs have been identified, it is clear that, apart from West Midlands Interchange, there are no sites within the search area which represent genuinely suitable locations for a Strategic Rail Freight Interchange development.</p> <p>The Proposed Development proposals have been designed to limit and mitigate their effects, as required by the NPS. The benefits of the Proposed Development substantially outweigh the residual adverse effects, whilst the need for the development is strongly established in principle in the NPS and specifically in this case through independent study as well as FAL's own assessment.</p>	
Concerns about inadequate transport links in the area.	The Site has been specifically chosen because of the very specific requirements of SRFIs for high quality connection to the motorway network and a full gauge rail line.	N
A concern was raised that homes would have to be destroyed to make way for the site.	The Statement of Reasons (Document 4.1) sets out why each property that is being purchased was needed.	N
Concern that the Proposed Development would increase the risk of flooding; this led to a	The construction of the West Midlands Interchange would provide opportunity to regularise the surface water and groundwater flows on and around the Site, incorporating vital control for storm flows while maintaining local water quality, and encouraging biodiversity.	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
<p>suggestion that the SRFI Site should be safeguarded for current and future flood management as a Reservoir overflow.</p>	<p>The Site was originally a naturally formed a basin tributary to the River Penk, historically modified to accommodate agricultural uses, the Staffordshire and Worcestershire Canal and the West Coast Mainline; Latterly Calf Heath Quarry has further altered the hydrogeology and hydrogeology.</p> <p>The surface water design has included a study of how the surface water and ground water currently flow around and away from the Site; the new strategy seeks to mimic the flow routes but includes strategically placed flow controls and open water bodies which will reduce the flow rate and store rainwater during extreme storm events. The result will be a reduction in 'flash flood' effects in watercourses downstream of the Site and no artificial increase of the groundwater table will take place as a result of the scheme.</p> <p>The strategy has been designed to discharge water via the existing outfalls at a rate less than that expected for a storm that happens once a year, but the system includes enough storage volume to hold water for storms which will only occur once every hundred years with no flooding. The design is in accordance with the latest best practice and policy guidelines and also includes a 40% improvement to allow for future climate change effects.</p> <p>The proposals for mitigation of flooding effects are discussed in the Water and Flood Risk chapter of the Environmental Statement (Document 6.2 Chapter 16).</p>	
<p>Doubt over the suitability of the nearby rail lines as</p>	<p>Network Rail is wholly responsible for pathing of trains to and from the Site, and would not develop a timetable solution which in any way compromised existing passenger (or freight) services. Paths for new trains to and from the Site would</p>	<p>N</p>

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
the passenger railway line is already very busy.	be applied for by the freight train operating companies (not by FAL) through established industry processes, as used successfully for every other SRFI over the last 20 years. Please refer to the Rail Operations Report (Document 7.3) which provides further information.	
Concern that the Site is isolated and is not near any emergency services.	The Site is next to the M6 and connected by the A5 and the A449. Fire Stations are located in Penkridge (approx. 5 km from site), Brewood (approx. 5.5 km from site), Cannock (approx. 10 km from site) and Wolverhampton (12.7 km from site). Wolverhampton Hospital is 12.1 km from site.	N
Concern that the SRFI Site is too large for the area, which was also linked to concerns that the area will lose its character and residential amenity.	The approx. 297 ha area proposed for the Site will allow the delivery of an SRFI facility, responding to an identified scarcity of supply by delivering up to 743,200 sq m of rail-served warehousing. This proposal is a direct response to the scale of the unmet need for rail-served warehousing in the north-west of the West Midlands. The Proposed Development would be of sufficient scale to be attractive to the market and to secure the frequency of trains necessary to achieve a high quality rail-served centre for distribution. This would enable significant modal shift away from exclusively HGV based distribution, which is characteristic of the area. This is also addressed in detail in the Planning Statement (Document 7.1A, Section 5.4). With regard to the potential impact of the Proposed Development, a comprehensive assessment has reviewed the Proposed Development against a full range of environmental and planning considerations and particular attention has been paid to the proximity of residential properties. The careful design and assessment of the Proposed Development has ensured that they have evolved to	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
	respond sensitively to the characteristics of the surrounding area and, in particular, to limit and mitigate their effects, as required by the NPS.	
Area largely unsuitable due to the lack of an available workforce in the area, as the local unemployment rate and job seeker numbers are low.	A full Alternative Sites Assessment (Document 7.2) has demonstrated why this is the only site to deliver this infrastructure within an area of demonstrable and established need. Increased job opportunities would help to reduce the substantial amounts of out-commuting currently occurring in South Staffordshire. In addition, the profile of the available workforce in the area matches the requirements of the occupiers of the Proposed Development.	N
New development would be needed to accommodate new workers, further damaging the amenity of the area.	<p>Detailed assessment of existing to work patterns (both by sector and by regional characteristics) has been undertaken, which has confirmed that no new housing would be required to accommodate workers at the Site. This work has included reviewing skill levels and qualifications within a reasonable travelling distance against the jobs that are anticipated to be provided by the Proposed Development.</p> <p>This evidence demonstrates that the catchment of potential employees is substantial and adequate to provide a labour supply for the Proposed Development without any significant migration.</p> <p>Additionally, any DCO consent would provide a strict Order Limits Boundary (Document 2.4), outside of which no further development would be permitted.</p>	N
Concern that the size means the local planning process has been circumvented.	The Planning Act 2008 (the Act) sets out the planning process for developments which are classified as Nationally Significant Infrastructure Projects. Nationally Significant Infrastructure Projects require a type of consent known as a	N

Topic: Site suitability		
Summary of responses	Regard to responses (section 49)	Change
	<p>Development Consent Order which is decided by the Secretary of State for Transport, following a recommendation from the Planning Inspectorate.</p> <p>The Act also requires applications for Nationally Significant Infrastructure Projects to be determined in accordance with the relevant National Policy Statement. In the case of SRFIs, the National Networks National Policy Statement (the NPS), published in December 2014, sets out the need for (and the Government’s policies to deliver) Nationally Significant Infrastructure Projects on the national road and rail networks in England, including SRFIs.</p> <p>However, regional and local policy can also be “important and relevant” to the determination of a DCO and full consideration of local policy is provided in the Planning Statement (Document 7.1A). In addition, FAL’s Team has worked closely with the Planning Officers from South Staffordshire District Council and Staffordshire County Council whilst developing the scheme.</p>	

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
<p>A major concern related to the adequacy and clarity of the mitigation measures around the surrounding environment of the Site.</p>	<p>Potential environmental effects of the Proposed Development have been considered comprehensively throughout an Environmental Impact Assessment (EIA). This information is presented in the EIA Scoping Report, the Environmental Statement (Document 6.2), the Habitat Regulations Assessment (HRA) and the No Significant Effects Report (NSER).</p> <p>An extensive series of mitigation measures have been identified and incorporated into the development proposals to mitigate effects identified throughout the EIA</p>	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
	process, as well as a range of enhancement measures that will create beneficial effects in some instances.	
Concerns were raised about negative impact on the local amenity.	<p>The Site has been chosen in part due to its limited potential impact on a major built up area, whilst being close to the conurbation it would principally serve. The scale and exceptional relationship of the Site with major road and rail routes make it the only site suitable in the area to meet the need for an SRFI. FAL acknowledge that the Proposed Development nevertheless has the potential to impact those close to the Site.</p> <p>Effects of the development on amenity have been assessed in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14), under the 'Recreation and Amenity' sections under both construction and operational effects assessments.</p> <p>Amenity assessments relate to quality of life, considering how potential effects of the development such as noise or traffic could impact on the usefulness or desirability of living in, working in or visiting the local area for recreation or leisure, including rambling.</p> <p>This does recognise that there will be some significant effects, but also how measures have been incorporated to mitigate and minimise these effects as much as possible. For example, the Proposed Development will include approximately one third of the Site dedicated to landscape/green end uses, and these areas will help to limit the extent of the effects on the local and wider area.</p>	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
Concerns were raised about the negative impact on historically significant sites like the Roman road and ruins.	<p>Archaeological evaluation has been undertaken which includes agreement of a written scheme of investigation (WSI) with Staffordshire County Council.</p> <p>The Roman ruins in proximity to the Site are considered in the Built Heritage Chapter of the Environmental Statement (Document 6.2, Chapter 9), because they are subject to statutory heritage designation as Scheduled Ancient Monuments.</p> <p>The evaluation finds that the change to the character of the land contained within the Application Site will not affect any appreciation of the Roman remains which are, in any event, below ground. Because of distance, interposing development and screening, there will be no shared visibility.</p> <p>It is assumed the Roman road referred to is the A5 at the north boundary of the Site which has its origins in the Roman road, Watling Street. The character of the A5 is entirely modern and passes through a range of modern environments, including the M6 Interchange to the east.</p>	N
Concerns were raised about the negative impact on listed buildings like Somerford Hall.	<p>As before, all the listed buildings within a 1km radius of the Application Site and highly graded listed buildings within a 3km radius of the Site have been identified and assessed in the Built Heritage Chapter of the Environmental Statement (Document 6.2, Chapter 9). The effect of the Proposed Development on these heritage assets has been considered in line with the heritage methodology presented in the Environmental Statement and best practice.</p> <p>The distance and lack of shared visibility means there will be no impact on the significance or setting of Somerford Hall arising from the Proposed Development.</p>	N

Topic: Environment - general		
Summary of responses	Regard to responses (section 49)	Change
Concern that community groups would no longer be able to use the countryside, including Ramblers and the shooting club	<p>Whilst a small number of existing footpaths will be lost as part of the Proposed Development, a network of new footpaths will be established within the new Community Parks which will increase public accessibility to the Site.</p> <p>The shooting club is on private land leased to tenants. All leases will be terminated according to their terms and conditions with the appropriate notice required.</p>	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
Comments that air quality is already poor, with specific concerns about Gailey and Penkridge.	The Air Quality chapter of the Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment, which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment (Document 6.2, Technical Appendix 15.01).	N
Concerns were raised about existing high asthma levels.	The air quality assessment considers potential emissions against the Air Quality Standards Regulations 2016. These standards are based on human health criteria. The assessment considers potential increases in NOx and other emissions from traffic as a result of the Proposed Development. Both the transport and air quality chapters include receptors and the road network at Gailey and Penkridge.	
Concerns also stemmed from the existing air pollution owing to the Site's location being surrounded by high traffic	The air quality assessment has shown there would be no increase in the number of receptor locations which exceed relevant human health air quality objectives as a result of the Proposed Development and the Proposed Development does	

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
levels on motorways and local roads.	not introduce new receptors into a location of poor air quality. The impact of the scheme is not therefore considered to be significant in terms of human health (Document 6.2, Chapter 14).	
Concern that the Proposed Development would not reduce congestion (CO2/diesel emissions) which is against Government policy.	The National Networks NPS explains the cause of the need for an expanded national network of SRFIs, and acknowledges the role that rail transport has in reducing pollution and congestion: <i>"Rail transport has a crucial role to play in delivering significant reductions in pollution and congestion. Tonne for tonne, rail freight produces 70% less CO2 than road freight, up to fifteen times lower NOx emissions and nearly 90% lower PM10 emissions. It also has de-congestion benefits – depending on its load, each freight train can remove between 43 and 77 HGVs from the road"</i> (paragraph 2.35). The NPS goes on to state that <i>"modal shift from road and aviation to rail can help reduce transport's carbon emissions, as well as providing wider transport and economic benefits. For these reasons, the Government seeks to accommodate an increase in rail travel and rail freight where it is practical and affordable by providing for extra capacity"</i> (paragraph 2.40).	N
Areas around the Site are already part of Air Quality Management Zones.	The Air Quality chapter of the Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment (Document 6.2, Technical Appendix 15.01). This assessment identifies which areas around the Site are already part of Air Quality Management Areas, and considers the effects of the Proposed	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
	Development on these sensitive receptors. The assessment has shown there would be no increase in the number of receptor locations which exceed relevant human health air quality objectives as a result of the Proposed Development and the Proposed Development does not introduce new receptors into a location of poor air quality.	
Concerns about an increase in pollution, with specific concerns from those living in areas such as Gailey, Penkridge and the M6 and on local roads in general.	The Air Quality chapter of the Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment (Document 6.2, Technical Appendix 15.01).	N
Concerns included increased emissions from HGVs, trains and due to the increased numbers of commuters to the Site.	The detailed air quality assessment (Document 6.2, Chapter 7) includes details of monitoring data of existing air quality (as per records held by South Staffordshire District Council). The assessment includes potential effects on Gailey and Penkridge.	
Concern that the effect of increased emissions would be exacerbated by the cutting down of trees on site.	Trees at the Site will be retained where possible and the Proposed Development includes a comprehensive landscaping buffer and bunds planted with trees which will mitigate visual, noise and air quality effects to nearby receptors. No ancient woodland would be lost as part of the Proposed Development. The provision of	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
	the two Community Parks will also separate the developed areas/roads from receptors with significant widths of landscaping.	
Concerns about air pollution and its effect on the environment.	<p>The Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment (Document 6.2, Technical Appendix 15.01).</p> <p>The air quality assessment considers potential emissions against the Air Quality Standards Regulations 2016. These standards are based on human health criteria. The effects on ecological receptors including Cannock Chase are also included in the Environmental Statement (Document 6.2, Chapter 7). Where applicable, mitigation measures will be included in the final Environmental Statement (Document 6.2, Chapter 7).</p>	N
Mitigation proposals for air pollution were not good enough	<p>The Air Quality chapter of the Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment (Document 6.2, Technical Appendix 15.01). The Assessment shows there would be no increase in the number of receptor locations which exceed relevant human health air quality objectives as a result of the Proposed Development and the Proposed Development does not introduce new receptors into a location of poor air quality. The impact of the scheme is not therefore considered to be significant in terms of human health.</p>	N
Concerns about the health impacts of pollutants from commuter's cars, HGVs and trains. These included increased cancer risks (lung, breast and child cancer), respiratory		

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
illnesses (like asthma), eczema, general mental health, and diseases such as Alzheimer's and heart disease. Pollutants mentioned included CO2, NOx, particulates and PM10s.	The proposals are anticipated to reduce overall HGV movements across the wider road network resulting in significant reductions in regional NOx, PM10 and PM2.5 emissions. The increase in movements of goods via freight would result in a beneficial impact on regional air quality.	
Concerns that the HGVs using the Site will be using diesel, which increase particulate levels and harmful emissions. In this regard, a concern was raised that the impact assessment was poor.		
Concerns were expressed about the lack of information surrounding current levels of air quality including requests for information on what the current statistics are,		

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
<p>what research has been done and whether this will be shared with the public.</p> <p>General concerns that air quality, as an issue, has been overlooked; including concerns the masterplan does not address the impact of residential properties to the north and south of the Site.</p>		
<p>A concern about animal health due to poor air quality.</p>	<p>The Environmental Statement (Document 6.2, Chapter 7) includes the results of a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development as derived from the Transport Assessment (Document 6.2, Technical Appendix 15.01). The air quality assessment will consider potential emissions against recognised air quality standards. The effects on ecological receptors including Cannock Chase are also included in the Environmental Statement (Document 6.2, Chapter 7). Where applicable, mitigation measures will be included in the final Environmental Statement (Document 6.2, Chapter 7).</p>	N

Topic: Air quality		
Summary of responses	Regard to responses (section 49)	Change
Request that pollution levels at schools in Penkridge be monitored.	The Environmental Statement (Document 6.2, Chapter 7) includes a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development on Penkridge. The air quality assessment will consider potential emissions against recognised air quality standards. These standards are based on human health criteria. There are no proposals for the Applicant to undertake air quality monitoring at Penkridge. South Staffordshire District Council already have a remit to monitor at locations in the district which include Penkridge.	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
Insufficient detail provided during the consultation on the impact of the proposals on endangered and protected species, agricultural land, mature trees, pollinating insects, and otters	Extensive consideration of the effects on wildlife habitats was included in the Draft Environmental Statement (including a full suite of habitat/species surveys) presented as part of the Stage 2 Consultation (see Document 6.2, Chapter 10).	N
Concerns about the effect on Cannock Chase, with reasons cited being its	Cannock Chase has been considered as part of the habitats regulation assessment and has been furthered considered in the air quality chapter of the final Environmental Statement (Document 6.2, Chapter 7). Potential effects on	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
status as one of the few remaining lowland heathland areas in the UK, its importance as a habitat for many species and its classification as an Air Quality Management Area	European Designated Sites, including Cannock Chase Special Area of Conservation (SAC), are considered in a Habitat Regulations Assessment (HRA) and a No Significant Effects Report (NSER). No significant effects are identified either in the Environmental Statement or the NSER on habitats at Cannock Chase, including from air quality.	
Concerns about the destruction of wildlife habitats for various species, many of which centred around protected and endangered species. These included Birds (such as bramblings, fieldfares, redwings, lapwings, little ringed plovers, kingfishers, and barn owls), brown hares, hedgehogs, deer, bats, badgers, otters, polecats, common toads, great crested newts, pollenating insects. The	<p>Extensive consideration of the effects on wildlife receptors including habitats, flora, fauna, protected species and designated sites for nature conservation is included in the Ecology and Nature Conservation chapter of the Environmental Statement (Document 6.2, Chapter 10) including an account of comprehensive habitat and species surveys. The methodology, assessed effects and mitigation measures have been agreed through consultation with the relevant stakeholders and regulatory bodies including Natural England and Staffordshire County Council.</p> <p>A full account of the baseline conditions at the Site as identified through surveys and desk study information is presented on pages 12 to 21 of the Ecology and Nature Conservation chapter (Document 6.2, Chapter 10). A comprehensive package of embedded mitigation measures has been incorporated into the scheme to mitigate effects on ecological receptors, described on pages 21 to 24 of the Ecology and Nature Conservation chapter (Document 6.2, Chapter 10). The effects of the Proposed Development on identified ecological receptors is presented on pages 24 to 41 of the Ecology and Nature Conservation chapter</p>	Y

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
specific habitats mentioned were mature hedgerows, ponds, water courses, and trees.	<p>(Document 6.2, Chapter 10), and mitigation and residual effects are provided on pages 44 and 45.</p> <p>In direct response to concerns regarding the potential impact on farmland birds, FAL has secured voluntary agreements to provide offsite Bird Mitigation Land for the benefit of farmland birds for the duration of the construction (Document 6.2, Technical Appendix 10.4).</p>	
<p>Concerns over mitigation measures included:</p> <ul style="list-style-type: none"> • Concern that habitat mitigation would begin too late, which would threaten wildlife in the interim period. • Concern that the practice of repatriating bats has not proven to be successful. • Concern that water birds will not be able to clear the buildings. 	<p>Chapter 10: Ecology and Nature Conservation of the Environmental Statement (Document 6.2, Chapter 10) provides a comprehensive assessment of the potential effects of the Proposed Development on all identified ecological receptors including designated sites, habitats and species. The assessment methodology, outcomes and mitigation have been agreed in consultation with stakeholders and regulatory bodies including Natural England, Staffordshire County Council and Staffordshire Wildlife Trust. The Ecology chapter (Document 6.2, Chapter 10) benefits from a comprehensive set of surveys and desk study data carried out and obtained for the purposes of the Environmental Statement. In addition, potential effects on European Designated Sites, including Cannock Chase Special Area of Conservation, are considered in a Habitat Regulations Assessment (HRA) No Significant Effects Report (NSER). No significant effects are identified either in the Environmental Statement or the NSER on habitats at Cannock Chase, including from air quality.</p> <p>Mature trees are considered as receptors in the Ecology chapter (Document 6.2, Chapter 10) and as landscape features in the Landscape and Visual chapter (Document 6.2, Chapter 12).</p>	Y

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
<ul style="list-style-type: none"> Concern that the mitigation measures are lacking a holistic approach. Concern that the Community Parks will not replace the habitats that are destroyed. 	<p>Effects on otters are considered in Document 6.2, Chapter 10: Ecology and Nature Conservation, and specific mitigation and enhancement measures relating to otters have been incorporated into the development proposals.</p> <p>A dedicated invertebrate survey was carried out for the Proposed Development and is included as part of the Ecology Baseline Report (Document 6.2, Technical Appendix 10.1). Butterflies and bees are included. Specific mitigation and enhancement measures relating to invertebrates have been incorporated into the development proposals.</p> <p>The design principles for the Community Parks include biodiversity enhancement. In many areas of the Site, there are many similar habitats that aren't as biodiverse, so the Community Parks comprise an opportunity for ecological enhancement. Furthermore, the scheme has been altered to improve ecological corridors across the Site, thus further minimising effects on protected species, and the indicative phasing amended to bring forward elements of ecological mitigation earlier in the construction.</p>	
<p>Suggestion: work with stakeholders to protect wildlife - Staffordshire Wildlife Trust</p>	<p>The Applicant team have met with Staffordshire Wildlife Trust and have fully considered Stage 2 comments raised by the Trust. In addition, the Applicant team have engaged with Natural England, Staffordshire County Council Ecology team and Staffordshire Badger Group.</p>	N

Topic: Ecology and nature conservation		
Summary of responses	Regard to responses (section 49)	Change
Request for trenches and ditches to have escape slopes built in or fitted at the end of each working day.	These requests have all been incorporated in to the Framework Ecological Mitigation and Management Plan (FEMMP) (Document 6.2, Technical Appendix 10.4).	Y
Request for drainage or sewage pipe-work 150mm diameter, or over, is blanked off at the end of each working day.		
Request for workers on the Site are advised not to handle badgers that become trapped or fall victim to Site conditions.		
Call out details of experienced badger rescue worker(s) are included.		

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
<p>Significant concerns about the visual impact of the Proposed Development including the height of buildings, an unsuitable design for the countryside, and the potential spoliation of views into and out of the Site.</p>	<p>The potential visual effects of the Proposed Development have been an important consideration in designing the scheme and have been assessed. There will inevitably be some significant visual effects. However, careful attention has been paid to the building surrounds to include mounding and planting to limit views particularly towards the lower active parts of the Proposed Development. Consideration of the colours and elevational treatments of the buildings will also assist in mitigating the visual effects.</p> <p>The building height parameters have been set to ensure the tallest 30m zone is towards the centre of the development; the 20m zone abuts all the perimeter of the development and residential/canal corridor areas and covers approximately 62% of the development. The building cladding panels will be designed to minimise visual impact.</p> <p>The approach being taken is set out in the Design and Access Statement (Document 7.5, Sections 6.5 and 6.6).</p>	N
<p>Concern about the visual impact on Cannock Chase AONB.</p>	<p>The effects of the Proposed Development upon the Area of Outstanding National Beauty (AONB) and the special qualities of this landscape and upon users of the AONB and Shoal Hill are detailed in the Environmental Statement (Document 6.2, Chapter 12). A photomontage depicting the view of the Proposed Development from Shoal Hill is included at Figure 12.13 (Viewpoint 32). Careful attention has been paid to the effects of the Proposed Development upon this landscape and these will be limited to a very small part of the designated landscape at its south western extent, which includes Shoal Hill.</p>	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
Concerns about the impact of light pollution from the Site including concerns about 24/7 lighting.	<p>Closer residential receptors would be likely to experience a moderate adverse impact in terms of light presence (visibility of lighting, including lit surfaces) and a slight or moderate increase in local sky glow. All other lighting impacts on non-ecological receptors would likely be minor adverse or negligible.</p> <p>In light of comments from Stage 2 Consultation, additional dark wildlife corridors have been provided throughout the Site to minimise and mitigate against the potential impacts of light on wildlife - for example, the area between Zones A4 and A5 on the Development Zone Parameter Plan (Document 2.5) has been widened to 100m.</p> <p>Properties on Straight Mile would experience a very slight increase in sky glow in the direction of the Proposed Development, and it is concluded that the increase in light presence will be slight. Mounding and planting will limit views of the lighting at the Proposed Development.</p> <p>Properties in Coven and Brewood may have small glimpses of the Proposed Development, however, existing vegetation and newly proposed landscaping will eliminate most of the lit development from view. There will be at most a very slight increase in local sky glow in the direction of the Proposed Development.</p> <p>Further details can be found in the Lighting Strategy (Document 6.2, Appendix 12.8).</p>	Y
Scepticism about the effectiveness of bunds (earth banks) and trees	The primary purpose of earth banks and trees is not to restrict lighting. Lighting will include downward directional lighting, specified to minimise the effects of	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
in mitigating light pollution and the visual impact. With regard to the latter, this was due to the time taken to grow to a sufficient height and foliage density.	<p>potential spillage. Further details are included in the Lighting Strategy (Document 6.2, Appendix 12.8).</p> <p>With regard to the visual effect, the Proposed Development will not be completely hidden by trees. However, the existing conserved and new woodland, tree and other planting, in conjunction with the proposed mounding, will be effective in screening much of the lower and 'active' parts of the scheme. This will include some semi-mature and larger trees and planting stock. All of the conserved and new planting and habitats will be the subject of a comprehensive management and maintenance regime. All of the planting proposals will begin to mature once planted and will increasingly and positively contribute to the environment of the Proposed Development from the outset.</p>	
A concern that the headlights of the HGVs leaving and entering the Site will increase the light pollution	As is custom and practice for lighting impact assessments, transient light pollution from vehicle lighting is not assessed. Any light pollution emanating from vehicle lighting will be considerably smaller than for the fixed lighting of the Proposed Development, although one or two receptors might experience headlight beams momentarily sweeping over their property as a vehicle passes.	N
Suggestion: buildings should be set back, further away from the surrounding area, main roads and residential properties (including on the A449), and should be separated by more green	<p>All of the built development area, as shown on the Development Zone Parameter Plan (Document 2.5) has been set back from the surrounding area, including residential properties and main roads. The Development Zone Parameter Plan shows the strong green infrastructure boundaries that will mitigate against the potential impacts, including visual, noise and pollution.</p> <p>The Green Infrastructure Parameters Plan (Document 2.7) provides further details of bunding and other mitigation measures around the Site which will</p>	N

Topic: Landscape and visual		
Summary of responses	Regard to responses (section 49)	Change
<p>buffers to mitigate visual impact.</p>	<p>minimise the impacts of the Proposed Development. With a strong commitment to planting and green infrastructure which will mature over time, no long-term major adverse effects are forecast and the application proposals would meet the policy requirements of the NPS. The proposed mounding and planting is not intended to 'fully hide the development'. The proposed mounding in conjunction with the proposed planting will, however, provide an effective visual screen for potential views from many properties and surrounding locations towards the lower and more 'active' parts of the Proposed Development.</p> <p>A limited number of residents on the A449 will see the Proposed Development. These residents are assessed at Visual Receptors R14 - R17 within the Environmental Statement (Document 6.2, Chapter 12 and Appendix 12.6 (Visual Effects Table)). Views eastwards and towards the Site from these properties vary with close clear views across the A449 possible from one property fronting on to this road and more restricted and limited views possible from other properties.</p> <p>Please see the Environmental Statement (Document 6.2, Chapter 12) for further details.</p>	
<p>Suggestion: plant trees early on to give maximum screening.</p>	<p>The landscape and planting proposals will be phased as part of the overall scheme. This will include significant planting and the formation of the Croft Lane Community Park within Phase 1 and the southern part of the Calf Heath Community Park within the indicative Phase 2. Other planting will be undertaken as soon as practicable within the respective phase and often following the formation of the earthworks/ mounding.</p>	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
Comment that existing noise pollution from the Site is already bad.	Operational noise from the existing Site is limited to farming activities and the on-site quarry. The noise survey data indicates relatively low background noise levels. Details can be found in the Environmental Statement (Document 6.2, Chapter 13).	N
Concerns about the noise assessment presented as part of the Stage 2 Consultation.	A comprehensive noise assessment has been submitted with the Application (Document 6.2, Chapter 13). This includes a methodology for how the assessment was undertaken.	N
Concerns were raised about increased noise from trains, HGVs (including refrigeration HGVs), an increasing number of worker's cars, and construction works.	The Environmental Statement (Document 6.2, Chapter 13) includes a detailed noise and vibration assessment, covering noise generated at the Site during construction and operation, and by car and HGV movements associated with the Proposed Development as derived from the Transport Assessment carried out for and presented within the Environmental Statement (Document 6.2, Technical Appendix 15.01). Mitigation measures (bundling) and noise insulation (outlined in Stage 2 consultation documents) have already been proposed based on the noise assessment undertaken, and where significant effects have been identified.	N
Concerns were raised about site specific noise, including its 24/7 nature.		N
Concerns about health including sleep disruption	The impact of noise is considered in Chapter 13: Noise and Vibration of the Environmental Statement (Document 6.2). This includes consideration of sleep	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
as a result of increased noise.	disturbance with reference to the World Health Organisation's Guidelines for Community Noise.	
General comments about noise disruption to locations such as Coven, Calf Health, Penkridge and local schools and farms. Houses near the Main Line were raised as a concern owing to their proximity to trains.	The Noise and Vibration chapter of the Environmental Statement (Document 6.2, Chapter 13) explains the methodology for the noise modelling undertaken. The modelling considered construction noise and potential rail and freight noise. The assessment has considered potential night time disturbance and mitigation measures proposed to address these potential effects.	N
Concern about the impact of noise on site adjacent residential properties.	The Noise and Vibration chapter of the Environmental Statement (Document 6.2, Chapter 13) sets out an assessment of the likely significant noise and vibration effects of the Proposed Development. The assessment identifies moderate to major adverse effects arising from construction noise and moderate adverse effects from construction vibration. These will be mitigated by Best Practical Means as set out in the Outline Demolition and Construction Environmental Management Plan (Document 6.2, Technical Appendix 2.5) and the provision of a bespoke noise insulation scheme. During operation, the Proposed Development is predicted to generate moderate adverse effects from on-site operational noise. These effects will be mitigated by incorporating significant landscaped mounding into the Site and providing a bespoke noise insulation scheme.	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
Negative impact of noise on the local peace and quiet, amenity and quality of life, including the tranquillity of the canal.	There are no objective measures of tranquillity with regards to noise. The impact of noise on the local area, including the canal, is considered in Chapter 13: Noise and Vibration of the Environmental Statement (Document 6.2, Chapter 13).	N
Damage to the environment and local ecology as a result of noise.	The impact of noise on the local ecology is considered in Chapter 10: Ecology and Nature Conservation of the Environmental Statement (Document 6.2, Chapter 13).	N
Damage to the local tourism industry as a result of increased noise.	Effects of the development on amenity have been assessed in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14) under the "Recreation and Amenity" sections under both construction and operational effects assessments. Amenity assessments relate to potential effects on visitors, including tourists, considering how potential effects of the development such as noise or traffic could impact on the usefulness or desirability of living in, working in or visiting the local area.	N
Request for more information on the potential noise levels throughout the day and	Potential noise effects are calculated for properties in closer proximity of the Site. No significant noise effects for residents of Brewood are anticipated.	N

Topic: Noise and vibration		
Summary of responses	Regard to responses (section 49)	Change
night (over a full 24-hour day), specifically in Brewood.		
A concern that landscaping will be insufficient to lessen impact of noise pollution.	The earth bunds are substantial in height and the mitigation effects are calculated in the Noise and Vibration chapter of the Environmental Statement (Document 6.2, Chapter 13). Where the bunds are insufficient, additional measures such as acoustic glazing are proposed. With this in mind a voluntary noise mitigation package is being proposed as part of the DCO application.	N
Suggestion: developers provide private health checks for impacts of increased noise levels.	Provision of health checks does not accord with standard guidance as health can be affected by multiple variables. The EIA looks at effects and identifies mitigation measures based on human health criteria.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
The Proposed Development would have a negative impact on local communities, residents' quality of life, and the local area.	Both construction and operation of the site is unlikely to generate significant adverse effects on health from the project's effects on water, ground conditions, socio-economics, landscape and transport after mitigation (Document 6.2, Chapter 14). The negative effects on recreation and amenity experienced during construction are likely to be intermittent and mitigated. Furthermore, because construction is to be phased, the effects are unlikely to be consistently experienced. Once	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	<p>operational, the development will have a visual impact but this is likely to be insignificant in the long term. The noise assessment has identified moderate adverse effects from on-site operational noise and isolated moderate to major traffic noise effects during operation. These effects, though isolated, may have consequential effects on human health for those receptors that would be exposed to these effects. These effects would be mitigated via insulation for residents of local homes and other appropriate mitigation measures but may still have some isolated indirect effects on health where mitigation cannot be applied, such as on the canal moorings.</p> <p>On the other hand, quality of life in the area may improve thanks to the jobs and economic prosperity the development will provide, as well as the new Community Parks which will improve publicly accessible open spaces, thereby causing a positive effect on recreation and amenity.</p>	
Concern about the loss of homes and properties.	A full schedule of the residential properties to be demolished and the reasons for demolition are available in the Planning Statement (Document 7.1A, Appendix 4).	N
General concern about the impact of the Proposed Development on Cannock and Stafford.	<p>The provision of a substantial number of jobs at a wide range of skill and qualification levels is expected to have beneficial effects at a local level. There is an established and demonstrable need for logistics in the area, and it will have beneficial effects on the local economy as a whole.</p> <p>At a local level, displacement of other economic activity or employment is likely to be negligible – WMI would provide a relatively unique offer in the local context and would not result in a reduction in other local jobs. ‘Low’ levels of</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	displacement (approximately 25%) are expected to occur within the travel to work area (which includes Stafford and Cannock). Some existing activity may be displaced, but the majority of the increase in activity will be net additional to the area.	
The project will encourage the import of cheap foreign goods	The project will enable efficient logistics and the sustainable use of rail in the movement of goods. Freight will be both domestic (i.e. within the UK) and international; rail does allow freight to be moved between inland location and the ports cost effectively, both export and import. The UK is a trading nation and relies on that activity for much of its wealth. The project is targeted at servicing the existing flow of goods in the UK, and will not affect the source of goods.	N
Concerns about the negative impact of the proposals on property values in the areas surrounding the Proposed Development	Whilst socio-economic factors have been taken into account in the development and refinement of the proposals, the effect on house prices as a result of the Proposed Development, as with all types of development, is not material to its planning merits.	N
Concern that people may struggle to re-sell their homes if the project is approved.	Compensation arrangements are set out in the 'Compensation Code' based on legislation, case law and best practice. The relevant legislation provides that those whose property will be directly affected by the scheme through land take or the acquisition of new rights are entitled to compensation under the aforementioned 'Compensation Code'. FAL has worked closely with those affected landowners to negotiate compensation terms if this is appropriate. Any party who feels that they may have a claim for compensation is recommended to	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	seek professional advice and/or contact FAL, who will be happy to discuss their individual situation.	
Concerns were also raised about the impact on listed buildings such as The Roundhouse and Wharf Cottage at Gailey Wharf	<p>The visual effects on residents of these buildings is assessed within the Environmental Statement (Document 6.2, Chapter 9) as Moderate Adverse upon completion of the Proposed Development. The nearest proposed unit(s) will be set beyond conserved and proposed planting and mounding that will limit the views.</p> <p>The Built Heritage assessment of the Environmental Statement (Document 6.2, Chapter 9) has identified all the listed structures within a 1km radius of the Application Site and highly graded listed buildings up to 3km from the Site. The effect of the Proposed Development on these heritage assets has been considered in line with the heritage methodology presented in the Environmental Statement and best practice.</p>	N
Suggestion: affected properties are purchased at 125% of their current value.	The suggestion is noted and compensation for those properties being purchased are in line with best practice in the UK.	N
Concerns that the Proposed Development would negatively affect local businesses. This included a concern that the proposal to ban traffic	An assessment of the potential effects of the Proposed Development on businesses is presented in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14) in sections 'Effects on existing businesses, organisations and clubs during construction' and 'Effects on existing businesses, organisations and clubs during operation'.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
heading north on the A449 from turning right into Station Road at the Four Ashes public house will damage business.	<p>Chapters 8 and 9 of the Transport Assessment (Document 6.2, Technical Appendix 15.01) demonstrate that the traffic associated with WMI can be accommodated on the local highway network, and it is not expected therefore that local trade would be affected by congestion on the road network associated with WMI traffic.</p> <p>Specifically, carriageway widening would be localised to the areas around the proposed accesses on the A5 and will not impact on local businesses on this road. Access to local businesses will remain.</p> <p>Traffic wishing to reach the Four Ashes Public House from the south will be able to undertake a U turn at the proposed A449 roundabout in order to return back to the south. Consideration could be given to additional signage to direct travellers wishing to reach the Four Ashes Public House from the south, subject to the requirements of Highways England.</p> <p>The Demolition and Construction Traffic Management Plan appended to the Transport Assessment (Document 6.2, Technical Appendix 15.01, Sub-Appendix N) provides arrangements that will be put in place during construction. Information and construction updates will be provided to local residents and businesses along with contact details of the Site office should local residents or businesses have any queries about access or other construction matters.</p>	
A concern was raised that local businesses would not benefit from the	FAL will put in place an Employment, Skills and Training Plan Framework which will aim to support as many local people as possible into work and support local businesses to benefit from the activity at WMI.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
Proposed Development, only big multinational companies	<p>While small to medium-sized businesses (SMEs) are not expected to be tenants at WMI due to the scale of the floorplates, they will nonetheless benefit. Logistics is a key 'enabling' sector for a wide range of other industries - big and small. Improved logistics lowers costs and/or expands markets, which will benefit large and small companies throughout the area and beyond. For example, a small local company may experience shorter wait times or cheaper delivery charges as a result of improved connectivity.</p> <p>Parts of the supply chain may present opportunities for local businesses such as vehicle maintenance, catering, security and cleaning for example, and these partnerships will be supported by FAL and their partners wherever possible.</p>	
Concern about potential damage to existing local businesses.	The potential impact of the Proposed Development on local businesses is dealt with in the Socio-Economic and Human Health Chapter of the Environmental Statement (Document 6.2, Chapter 14) in the sections entitled "Effects on existing businesses, organisations and clubs" under both construction and operational effects assessments.	N
General comments that the job numbers given were inaccurate. Many within this commented that there was no evidence for how the figure of 8,550 jobs had been calculated.	A methodology is provided in the Statement of Economic Benefits (Document 7.1B) which explains the calculations.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
Concerns for some that most jobs will be transferred in from other areas where people already work, some of the new jobs will be transient (for example construction workers) and that automation or technological change will reduce the number of workers needed.	<p>The estimated 8,550 on-site jobs are permanent, full time equivalent, not temporary positions.</p> <p>Construction jobs would be additional to estimated 8,550 permanent jobs. By their nature, these construction jobs would be temporary. Construction workers are used to this and expect this as inherent to the nature of their jobs. Construction workers are highly mobile and will commute to where they are required. The length of the project, however, would mean that construction jobs here could be much longer term than average. Construction may run 10-20 years and contractors and their workers could be employed continuously for some or all of the phases, providing greater job continuity than the vast majority of construction jobs.</p> <p>Jobs will be in a wide range of skill levels and with training opportunities. We acknowledge that skills and jobs in warehousing have changed - and will continue to - in response to technological advancement. This is factored into our calculations. Current evidence shows that total jobs in logistics are not decreasing - but that the types of jobs in the sector are changing. Approximately 40% jobs will be higher skilled jobs including administrative and technical support services involving a degree of technical proficiency/computer literacy.</p> <p>More detail about this is set out in the Statement of Economic Benefits (Document 7.1B).</p>	N
Comments highlighting the lower than average levels of unemployment	The need for a SRFI in this location is the principal reason for the location of the Proposed Development; this is covered in detail in the Planning Statement (Document 7.1A, Section 5.2). However, the provision of local labour is a very important consideration - the job profile and number of jobs to be provided by	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
<p>in the area, and that there were no figures provided to demonstrate the need for jobs in the local area.</p>	<p>the Proposed Development are a strong match for the skill profile and employment level within the defined Travel to Work Area (see Document 7.1A, Section 15.3) and it will have beneficial effects on the local economy as a whole. The provision of a substantial number of jobs at a wide range of skill and qualification levels is expected to have beneficial effects at a local level and there is an established and demonstrable need for logistics in the area.</p> <p>Increased job opportunities would help to reduce the substantial amounts of out-commuting currently occurring in South Staffordshire. Whilst unemployment is low, economic inactivity and discouraged workers are still a local consideration and could be reduced by providing suitable local employment and training opportunities.</p>	
<p>Concerns that the jobs created by the Proposed Development would be filled by people outside of South Staffordshire.</p>	<p>There is an established and demonstrable need for logistics in the area and it will have beneficial effects on the local economy as a whole. Displacement of existing economic activity is expected to be low.</p> <p>Employee distribution is set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 6), whilst is expected that 18% of employees are expected to come from the local South Staffordshire area, employees would come from neighbouring authorities including Wolverhampton, Walsall, and Stafford.</p> <p>To promote sustainable travel to work patterns from these areas, measures are set out in the Site Wide Travel Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix H)/ the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G). These include proposals to</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	introduce employee shuttle buses and improvements to the existing public bus services to the Site. This potentially includes an additional two new buses and an improved service frequency between Wolverhampton City Centre and WMI; thus, enhancing the existing Service 54 to provide a half hourly service between Wolverhampton and the Site where required. This suggested service pattern reflects the most significant demand from the estimated location of employees. Should demand, or aspirations of the operator or other Stakeholders be to improve the service frequency between WMI, Penkridge, Stafford or any other destination, the proposals do not preclude this from being implemented in the future. As part of the annual travel plan, monitoring demand for bus patronage for WMI will be reassessed.	
Job creation is not a good enough reason for the scheme to go ahead.	<p>It is considered that the job creation and the economic benefits of the Proposed Development are significant and substantially outweigh the residual adverse effects. The need for the development is strongly established in principle in the NPS and specifically in this case through independent study, as well as the applicant's own assessment.</p> <p>Please refer to the Planning Statement (Document 7.1A, Chapter 15) for a full summary of the Proposed Development.</p>	N
South Staffordshire has a low unemployment rate, therefore will not be able to provide the workforce	Whilst unemployment in South Staffordshire is low, economic inactivity and discouraged workers are still a local consideration and could be reduced by providing suitable local employment and training opportunities. Increased job opportunities would also help to reduce the substantial amounts of out-commuting currently occurring in South Staffordshire.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	The provision of a substantial number of jobs at a wide range of skill and qualification levels is expected to have beneficial effects at a local level. There is an established and demonstrable need for logistics in the area, and it will have beneficial effects on the local economy as a whole. As a result, linked industries such as manufacturing would also be supported.	
Concerns about the likelihood that majority of the jobs will be minimum wage and/or zero hour contracts which is not attractive to those in South Staffordshire. Some believe FAL will therefore end up prioritising hiring less skilled, cheaper and foreign workers over skilled workers locally.	<p>An estimated 8,550 jobs will be created across a wide range of skill levels and with training opportunities. Jobs would be accessible in terms of skills and qualifications to employees within the travel catchment. Details are set out in the Statement of Economic Benefits (Document 7.1B). An Employment, Skills and Training Plan Framework will be established with local stakeholders.</p> <p>There are 31,660 unemployed residents within the Travel to Work Area who are currently seeking work and receiving unemployment benefits. Of these unemployed residents, the majority are seeking elementary and sales/customer service positions. Approximately half of the jobs supported by the Proposed Development would be at this occupational level.</p> <p>Around 40% of jobs will be higher skilled jobs and administrative and technical support services with good wages. All jobs would have opportunities for career development. More detail about this is set out in the Statement of Economic Benefits (Document 7.1B) and the Employment, Skills and Training Plan Framework.</p> <p>FAL will put in place an Employment, Skills and Training Plan Framework which will aim to support as many local people as possible into work. This will include partnerships with local councils and job centres, and will target key groups</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	locally. FAL will put in place partnerships with local training providers and suppliers, who have established links in the community. For more details see the Employment Skills and Training Plan Framework.	
New workers may commit crime and disruption in the area.	FAL will not employ workers on-site directly. Their occupiers and contractors would be the employers. Occupiers and contractors would have in place all the necessary legal measures required of them by English law and proportionate to their activities. FAL would also establish an Occupier and Contractor Charter and an Employment, Skills and Training Plan Framework which will aim to support as many local people as possible into work and set out best practice for employee training, support and conduct.	N
On the premise that new workers and families will move to the area, there were concerns about the lack of a suitable housing/rental market and a potential strain on public services.	A detailed assessment of existing Travel to Work patterns (both by sector and by regional characteristics) has been undertaken, which has confirmed that no new housing would be required to accommodate workers at WMI. This work has included reviewing skill levels and qualifications within a reasonable travelling distance against the jobs that are anticipated to be provided by WMI.	N
Current public transport provision is not enough to accommodate new workers, which will result	Employee distribution is set out in Chapter 6 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 6); while it is expected that 18% of employees are expected to come from the local South Staffordshire area, employees would come from neighbouring authorities including Wolverhampton, Walsall, and Stafford.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
<p>in more traffic and parking problems.</p>	<p>To promote sustainable Travel to Work patterns from these areas, measures are set out in the Site Wide Travel Plan (Document 6.2, Technical Appendix 15.01, Sub-Appendix H) /the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-Appendix G). These include proposals to introduce employee shuttle buses and improvements to the existing public bus services to the Site.</p> <p>This potentially includes an additional two new buses and an improved service frequency between Wolverhampton City Centre and WMI, thus, enhancing the existing Service 54 to provide a half hourly service between Wolverhampton and the Site as required. This suggested service pattern reflects the most significant demand from the estimated location of employees. Should demand, or aspirations of the operator, or other Stakeholders be to improve the service frequency between WMI, Penkrige, Stafford or any other destination, the proposals do not preclude this from being implemented in the future. As part of the annual travel plan, monitoring demand for bus patronage for WMI will be reassessed.</p> <p>Whilst it is accepted that walking to Penkrige Railway Station is beyond a nationally recognised walking distance, some workers may use the station as part of a multi-modal trip and cycle to and from WMI from the station. Rail demand is expected to spread across Penkrige, Cannock and Wolverhampton.</p> <p>Chapter 3 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Chapter 3) sets out that the A5 and A449 currently operate within capacity levels set as a national standard. The mitigation measures proposed as part of the Proposed Development as set out in Chapter 9 ensure the highway</p>	

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	network can accommodate the additional traffic associated with the Proposed Development.	
Improve the infrastructure and public transport links between South Staffordshire and the Midlands.	<p>Highway mitigation measures proposed are set out in Chapter 5. Such measures will provide benefit to all road users. In addition to physical infrastructure works, a number of measures, including to improve local bus provision, is set out in the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G).</p> <p>The existing 54 bus service provides an hourly daytime service between Stafford & Wolverhampton. As part of the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G) it is proposed that this service frequency is increase to allow for a half hourly service where required. This increase in frequency of service would benefit local residents. In addition, shuttle buses will be provided for WMI workers as part of the travel plan measures.</p>	N
Offer subsidised or free transport for workers to and from the Site.	As part of the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G), shuttle bus services could be provided between the Site and significant clusters of employees. Based on current demographics these are likely to be Cannock Chase, Walsall and the wider Wolverhampton urban area, however in practice the clusters will be informed by the personalised planning to be undertaken by the Travel Plan Co-ordinator	N
Develop a new passenger rail station with links to	It would not be possible to provide a passenger station and a rail freight terminal on the same site.	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
Stoke, Stafford, and Wolverhampton.		
Suggestion: Promote or use sustainable, low emission vehicles for an effective public transport system.	For public buses, this would need to be determined by Staffordshire County Council and the operators. For dedicated WMI buses, low emission vehicles can be included when specifying a supplier, by the Transport Steering Group.	N
Suggestion: Build family friendly houses to attract younger workers to the area.	A detailed assessment of existing Travel to Work patterns (both by sector and by regional characteristics) has been undertaken, which has confirmed that no new housing would be required to accommodate workers at WMI. This work has included reviewing skill levels and qualifications within a reasonable travelling distance against the jobs that are anticipated to be provided by WMI.	N
Suggestion: Prioritise jobs for local people, advertise jobs locally, train local young people, liaise with job clubs, promote apprenticeships, work with SMEs, host careers fairs.	<p>FAL will establish an Employment, Skills and Training Plan Framework which will aim to support as many local people as possible into work. This will include partnerships with local councils and job centres (including Job Clubs) and will target key groups locally. FAL will establish partnerships with local training providers, suppliers and authorities who have established links in the community and established means of advertising locally and informing local people about job and training opportunities.</p> <p>Whilst SMEs are not expected to be tenants at WMI due to the scale of the floorplates, they will nonetheless benefit. Logistics is a key 'enabling' sector for a wide range of other industries; big and small. Improved logistics lowers costs and/or expands markets, which will benefit large and small companies</p>	N

Topic: Socio-economic		
Summary of responses	Regard to responses (section 49)	Change
	throughout the area and beyond. For example, a small local company may experience shorter wait times or cheaper delivery charges as a result of improved connectivity. Parts of the supply chain may be suitable for SMEs (vehicle maintenance, catering, security, cleaning for example) and these partnerships will be supported by FAL and their partners wherever possible.	
Suggestion: a scheme to employ homeless people would be appreciated.	<p>FAL will put in place an Employment, Skills and Training Plan which will aim to support as many local people as possible into work. This will include partnerships with local councils and Job Centres and will target key groups locally. The Councils and their partners will undertake outreach programmes for employment initiatives which will be supported by FALs ESTP. These programmes could include targeted interventions for vulnerable people, which could include homeless people.</p> <p>FAL will put in place a framework to engage with local training providers and suppliers, who have established links in the community.</p>	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
General concerns regarding traffic and congestion during construction and operation.	A robust assessment of traffic volumes has been assessed based on scenarios with and without the Proposed Development. Traffic modelling has been agreed with Staffordshire County Council and Highways England as set out in Section 8. The Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 8) demonstrates that, with the introduction of specific and tailored highway improvements, the highway network can accommodate the additional traffic associated with the Proposed Development. During the construction	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	phase, all construction traffic will be managed through the Framework Construction Traffic Management Plan (Document 6.2, Technical Appendix 15.01, Appendix O), which sets out mitigation measures to control Site traffic.	
Traffic assessments are inaccurate or misrepresent the 'real' level of traffic in the area.	An assessment of traffic associated with the construction of WMI has been carried out as part of the Environmental Statement (Document 6.2, Chapter 15), to advise of a worst case scenario, with forecast changes. Traffic forecasts used in the assessment are based on surveys of the Daventry International Rail Freight Terminal (DIRFT) SRFI, which is an existing facility. All traffic forecasts have been agreed with Highways England and Staffordshire County Council. This includes all traffic associated with the Proposed Development and background traffic growth, with the proposed traffic generated by WMI separated between HGVs and LGVs.	N
Lack of evidence and detail in the traffic assessments including that they did not include the construction phase and a long enough timeframe for operation.	Traffic flows associated with the Proposed Development have been assessed and agreed with Staffordshire County Council and Highways England, as the local highway authorities. Traffic flow volumes from modelling work assessed are set out within the Transport Assessment (Document 6.2, Technical Appendix 15.01, Appendices R, S and T). This modelling includes the Proposed Development at forecast years of 2021 and 2036 (see Document 6.2, Technical Appendix 15.01, Section 8). It is considered that on the basis of the traffic modelling work carried out to date that sufficient provision has been made in order to ensure that the changes in traffic within the area surrounding WMI can be adequately mitigated.	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	<p>The demolition and construction phase of the development is not forecast to generate an increase in HGVs which will necessitate a detailed assessment of the Proposed Development's impact during the demolition and construction phase.</p> <p>Construction traffic will be heavily regulated by the Principal Contractor, with routing directions to WMI and time periods of delivery to avoid peak hours established. A Framework Construction Traffic Management Plan (Document 6.2, Technical Appendix 15.01, Section 5.6) sets out mitigation measures that are proposed, including routing in order to mitigate construction traffic.</p>	
<p>Concern that rail capacity figures have been exaggerated or are speculative.</p>	<p>The WMI proposals have been developed in close co-operation with Network Rail as the system operator for the main line. The scope of the timetable assessment was agreed in advance with Network Rail, and uses working timetable data and other input parameters as specified by Network Rail. The results indicate that sufficient paths exist in the timetable to enable WMI to operate as a SRFI as envisaged by the National Policy Statement. This should not be taken to imply that all available paths would be taken by trains to and from WMI, as the first phase of operations would establish up to 4 trains per day to and from the site, growing over the following years on an incremental basis up to a projected maximum of 10 trains per day to and from the site at a mature stage of development. The SRFI at DIRFT, operational for 21 years, currently handles 10 trains per day to and from the site. It should be stressed that the working timetable is not fixed but is subject to a constant rolling development programme over an 18-month cycle, with train operators bidding for paths as part of this process. Train operators serving WMI, as for any other SRFI or RFI, will apply for paths through this standard industry process as required to meet the needs of the customers as occupiers of the SRFI or in the local area, at the</p>	

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	time the customers establish their requirements. The proposals for WMI do not therefore attempt to speculatively identify detailed paths in the timetable several years in advance of when they might be needed. However, the level of available capacity in the current timetable provides sufficient confidence that the emerging requirements of the SRFI can be satisfied.	
The traffic assessments and projections are neither impartial nor independent.	The Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 8) sets out the extent of the traffic modelling assessments carried out. These have used nationally recognised modelling software programmes and have been agreed with the Staffordshire County Council and Highways England as the local highway authorities. This traffic modelling has been carried out by two independent consultants (Atkins and Systra) to ascertain the impact of the Proposed Development on the highway authority networks. For more information, please refer to the Transport Assessment (Document 6.2, Technical Appendix 15.01, Sections 8 and 9).	N
Congestion levels are already bad on the A5, A449, Station Road and other roads in the local area, the Proposed Development would make this worse.	<p>The strategic model used in the Transport Assessment (Document 6.2, Technical Appendix 15.01) to assess the impact of the Proposed Development on the local road network has been agreed with South Staffordshire County Council and Highways England. The model focuses on the primary road network during the busiest periods, which are the AM and PM peak hours. Where appropriate interpeak periods have been assessed, for example at the Intermodal Terminal Access to show the affect this would have on the A449/Site access.</p> <p>All of the routes assessed as part of the modelling are set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 15.9). These include the A5, A449 and Station Road, as well as other local roads. The</p>	Y

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	<p>assessment concludes that the A5, A449, Station Road and other local roads will all operate within capacity with the Proposed Development.</p> <p>Notwithstanding this, a Contingent Traffic Management Fund will be set up as part of the Proposed Development. Money from this Fund can be spent by Staffordshire County Council to implement local traffic measures in the event that a specific need is identified (see Document 6.2, Technical Appendix 15.01, Section 5.8).</p>	
<p>Concern about the increase in traffic due to employees going to and from the Site and people travelling into the area to use the community facilities.</p>	<p>The Transport Assessment (Document 6.2, Technical Appendix 15.01) demonstrates that, with the introduction of specific and tailored highway improvements, the highway network can accommodate the additional traffic associated with the Proposed WMI Development including from employees and those using the community facilities.</p>	N
<p>Concern that employees will have to commute in and will not utilise public transport to get to the Site.</p>	<p>The existing bus service 54 provides an hourly daytime service between Stafford & Wolverhampton. The Framework Workplace Travel Plan (Document 6.2, Technical Appendix 15.01, Sub-Appendix I) will ensure businesses promote sustainable travel modes for employees at WMI. This includes enhanced provision of local bus services and the introduction of employee shuttle buses. With regard to the local bus services, it is proposed that the existing 54 service between Stafford and Wolverhampton is increased in frequency from an hourly to a half hourly service as required. This increased frequency of service would encourage employees to use the service to access the Site. With regard to the</p>	N

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Summary of responses	Regard to responses (section 49)	Change
	shuttle bus service, special WMI staff shuttle buses for areas with significant clusters of employees are proposed.	
There is a lack of provision for cyclists and pedestrians along the A5.	Improved facilities for pedestrians and cyclists are proposed as part of the Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.01, Sub-appendix G). Pedestrian provision will be provided at the arms of the A5/Site access junction. A new footpath from the Site access junction towards Gailey Marina is proposed. On the north side of the A5, a 3 metre shared use cyclepath/footpath is proposed, from the Site access junction to the Gailey Roundabout and Avenue Cottages.	N
The proposals would worsen already bad congestion on market days in Penkrige and when Weston Park hosts major events.	<p>As a strategic Site using strategic models, daily influences of local markets would not be considered. However, local mitigation measures within Penkrige including the HGV ban for traffic associated with WMI are set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 5).</p> <p>The onus is with the event organisers of temporary events to ensure as part of their traffic management plans that they would minimise traffic disruption on the local road network, in co-operation with the local highway authority. Highways England will sit on the Transport Steering Group and liaise with the Travel Plan Co-ordinator on planned events that may influence traffic conditions on the strategic road network. From previous years, traffic travelling from the south would be directed to the V Festival via the M54, whilst traffic from the north and east may use Gailey roundabout. With the provision of the A449/A5 Link road through the Site, such localised pressure will be alleviated.</p>	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
Concern about the effect of road closures or incidents on the M6, A449, A34 and A5 that might divert traffic into Penkridge and cause gridlock.	From the modelling work undertaken and agreed with Staffordshire County Council and Highways England, the level of change associated with traffic from the Proposed Development through Penkridge to the Gailey roundabout is relatively low. This is shown in the Transport Assessment (Document 6.2, Technical Appendix 15.01). Signs for WMI will be installed on the strategic road network, to enable drivers to avoid Penkridge. In addition, as part of the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I), a key mitigation measure is to enforce against HGVS accessing WMI through Penkridge.	N
Concern about increased traffic around school routes.	An assessment of links with sensitive receptors including schools has been analysed as part of the Environmental Statement (Document 6.2), including on the A449. However, no link with a sensitive receptor is forecast to experience an increase of more than 10% in HGV flows, therefore no mitigation measures are proposed.	N
Concern that mitigation measures will be insufficient to offset the negative impact of extra traffic including suggestions for other mitigation measures such as new junctions on the A449, detrunking the A449, reducing the	Traffic modelling agreed with Staffordshire County Council and Highways England has shown that local roads are operating with capacity; this can be found in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 3). Highways England and Staffordshire County Council have confirmed that, with the proposed mitigation, sufficient capacity exists on the highways network for the Proposed Development without causing delay or congestion.	N

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Summary of responses	Regard to responses (section 49)	Change
number of lanes on the A449 and introducing new speed limits on local roads.		
Concern that the HGV ban through Penkrudge will not be enforced.	<p>As part of the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I), all HGVs travelling to WMI will need to be pre-booked and advised on routing arrangements prior to their arrival on site. This will indicate that HGVs/ drivers travelling south on the M6 will need to use Junction 12 in accordance with the Penkrudge HGV Ban. Subject to agreement from Highways England and Staffordshire County Council, signs for WMI will be installed prior to Junction 13 from the M6 to advise drivers to use Junction 12 (See Document 6.2, Technical Appendix 15.01, Figure 9 and Section 5).</p> <p>HGVs accessing WMI will be banned from using the A449 via Penkrudge. This will be managed by the Transport Steering Group, which is anticipated to include local authority representation such as Staffordshire County Council and Highways England. It will be enforced through the use of the Automatic Number Plate Recognition system, or other available technology at the time of implementation will be used to track HGVs arriving at and departing from WMI. This is set out within the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I).</p> <p>Tenants of WMI will sign up to a management charter, and will be subject to financial penalties should HGVs associated with their warehouse route through the A449 in Penkrudge. It is proposed that a collaborative agreement is undertaken between WMI, Highways England and Staffordshire County Council</p>	N

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	to enforce these penalties (Document 6.2, Technical Appendix 15.01, Section 5).	
Concern local roads could be severely damaged by additional HGVs, and that the local authority would have to foot the bill for this.	<p>Traffic modelling has been agreed by Highways England and Staffordshire County Council; as the local highway authorities, they would also have responsibility for maintenance of their network. As part of the mitigation measures, a Contingent Traffic Management Fund will be created (Document 6.2, Technical Appendix 15.01, Section 5.8). Should degradation of the carriageway surfacing or damage to the local street furniture be attributed to WMI, this fund may be used for carriageway surfacing treatment or replacement of street furniture.</p> <p>A number of local roads are already subject to HGV restrictions. As part of the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I), a number of mitigation measures will be put in place to ensure HGVs do not use local roads.</p>	N
Concern that expanding or upgrading the road network would damage the Green Belt.	The Proposed Development would not require significant off-site changes to the existing road network and, if DCO consent is granted, there are no plans to expand the road network or expand the Proposed Development site in the future.	N
Concern that some very old cottages will likely be damaged by the increased vibrations	Potential off-site vibration has been considered. This assessment was included in the draft Environmental Statement submitted as part of Stage 2 consultation. This assessment did not identify any significant vibration effects on off-site properties.	N

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Summary of responses	Regard to responses (section 49)	Change
Safety concerns about increased collision risks due to extra traffic and dips in the A5 that inhibit visibility.	All highway mitigation measures introduced have been subject to an independent road safety audit and, where necessary, alterations will be made to the general highway arrangements proposed, in order to reflect the findings of the audits. The Transport Chapter of the Environmental Statement (Document 6.2, Chapter 15) sets out the how the traffic volumes associated with the Proposed Development would impact on the annual accident rate. The Environmental Statement concludes that with the migration measures introduced there is no severe impact on the number of accidents on the local highway network.	N
Increased danger to vulnerable road users such as cyclists, motorcyclists, horse riders and pedestrians	A number of cycling improvements are proposed as part of the Site's surrounding area. To ensure access to the Site for cyclists, these include upgrading the existing footway adjacent to the north of the A5 to provide where feasible a 3-metre-wide shared cycleway/footway, to ensure cycle access from the A5; to improve cycle access from Vicarage Road, it is proposed that a 3-metre cycleway/footway along the section of Vicarage Road between the existing bridge over the Canal and the proposed Site access junction is introduced.	N
Concern about potential delays causing access issues for and to local hospitals.	There are no hospitals with Accident & Emergency facilities in the immediate vicinity of the Site which would be affected by traffic associated with the Proposed Development. Local journey times have been assessed based on the AM and PM peak periods, and based on a 2021 scenario with the Proposed Development (Document 6.2, Technical Appendix 15.01, Section 9). Whilst it has been agreed that generally there are increases in journey times on these routes, these increases are not considered severe. For routes that pass through the Gailey roundabout, journey time savings are improved due to the provision	N

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	of the A449/A5 Link Road through the Site and other local highway mitigation measures proposed. Please refer to the Transport Assessment (Document 6.2, Technical Appendix 15.01, Sections 8 and 9).	
Increased traffic will lead to an increase in driver stress and ultimately more collisions.	As part of the Environmental Statement (Document 6.2) levels of changes in driver stress have been analysed, based on national threshold levels. Scenarios with and without the Proposed Development have been set out, and conclude that there will not be a significant impact on the annual number of accidents on the links assessed.	N
Concern that the Proposed Development would result in more traffic and a heightened fire risk.	With the proposed mitigation measures introduced as part of the Proposed Development the highway network can accommodate the additional traffic associated with the Proposed Development, and would not be anticipated to lead to a heightened fire risk. The A449/A5 and Vicarage Road Link Road along with access to warehouse buildings will be constructed to enable fire tenders to access premises.	N
Concern that the length of the freight trains is dangerous.	The safe length of freight trains is set by Network Rail in the UK. WMI rail freight operations are designed to handle the most advanced trains possible in order to make sure rail freight operations are as efficient as possible.	N
The Proposed Development would increase 'rat-running' through the local area as a result of increased traffic. Clear signage	All visitors to WMI will be advised to use the main road network, which will be signposted accordingly. Subject to agreement with Highways England and Staffordshire County Council, the proposed directional signage as shown in Figure 9 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Figure 9) would be introduced to advise drivers to follow the strategic road network for WMI.	Y

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
should discourage 'rat-running'.	<p>Local mitigation measures, including converting Crateford Lane to one way and introducing a right turn ban from the A449 onto Station Drive, are proposed to discourage use of local roads and potential strikes of the existing low bridge. In addition, traffic travelling between the A449, A5 and M6 can use the new A449/A5 Link Road (Document 6.2, Technical Appendix 15.01, Section 5). This will reduce the amount of road users using Station Drive.</p> <p>In terms of specific local roads, Section 9 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 9) sets out that there is no need for WMI traffic to pass through Calf Heath in order to access the Site, as Vicarage Road from the north provides a more expedient access route. Similarly, in terms of Coven, the traffic modelling does not indicate that there will be a net increase of traffic volumes in Coven, based on the Proposed Development, owing to the location of Coven being to the west of the A449.</p> <p>Notwithstanding the physical infrastructure works set out above and the predicted traffic levels on local roads, a Contingent Traffic Management Fund will be set up as part of the Proposed Development. Money from this Fund can be spent by Staffordshire County Council to implement local traffic measures in the event that a specific need is identified (Document 6.2, Technical Appendix 15.01, Section 5).</p>	
General concern about the increased traffic reducing the amenity or quality of life of local residents.	The WMI Site is surrounded and intersected by a number of urban and industrial influences, including the A449, the A5, the M6, the West Coast Main Line, the Staffordshire and Worcestershire Canal, Calf Heath Reservoir, the Four Ashes Industrial Estate, the SI Group Chemical Plant and the Calf Heath Quarry. Also adjacent to the Site boundary is the Veolia Energy Recovery Facility, the Severn	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	<p>Trent Sludge Disposal Centre and the Gestamp stamping factory to the south, with the Rodbaston Wind Farm approximately 1km to the north.</p> <p>The Site's proximity to the strategic road network would help to minimise its impact on the character of the surrounding area. All drivers visiting WMI would be given pre-trip information via the Framework Workplace Travel Plan and a Framework Site Wide HGV Management Plan (Document 6.2, Chapter 15, Technical Appendix J15.01, Sub-appendix I) to follow the directional signs on the strategic road network. The location of WMI close to the M54 and M6 ensures that journeys to and from the Site can be made on the appropriate road network, and that no use of local roads would be required.</p>	
Concern that upgrades and improvements would take too long and would negatively impact local residents.	As part of the construction phasing, (set out in Document 6.2, Technical Appendix 15.01, Section 7), the access points at the Site junctions with the A5 and A449 will be constructed during the first phase of construction. These two access points will be connected via the A449/A5 Link Road, which will also be constructed within Phase 1 and will improve the operation and resilience of the Gailey roundabout. For journey routes that pass through the Gailey roundabout, journey time savings are improved owing to the provision of the A449/A5 Link Road through the Site. While some journey time increases do occur, these increases are not considered severe.	N
Suggestion: Banning lorries from coming off the M54 at Weston to access the Site.	As part of the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I), pre-trip directional information will be supplied to HGV drivers to advise them to use the network of road signs for	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	WMI. From the M54, it is proposed that signs are erected on the M54 to advise drivers to use Junction 2 of the M54 for WMI.	
Suggestion: Widening local roads including a suggestion that the A5 and A449 from Junction 13 into Penkridge and the A5 from M6 to Gailey.	Traffic flows associated with the Proposed Development have been assessed and appropriate mitigation measures proposed. Link flows have been assessed against national standards (the Design Manual for Roads and Bridges). With the mitigation measures proposed no roads are operating over capacity, and therefore do not justify an upgrade to the number of lanes on the surrounding road network. Refer to Section 9 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 9) for more detail.	N
Suggestion: Building a dedicated access point onto the motorway from the Site.	This is not permitted by the Department of Transport and Highways England does not allow private accesses to the motorway to be created. The location of WMI was chosen due to its proximity to the A5 and access to the M6 J12. Through also providing access via the A449 which connects to the M54 to the south, this provides greater resilience to the operation of WMI by providing two access points from the motorway network.	N
Suggestion: Develop Smart motorway upgrades on the M6, to junction 13, before the Site is developed.	Modelling agreed with Highways England shows that the existing motorway network can operate within capacity with the Proposed Development. SMART Motorway infrastructure has recently been introduced in the vicinity of the Site - please refer to Section 3 of the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 3).	N
Suggestion: Installing new traffic lights at dangerous junctions such	Traffic modelling agreed by Highways England and Staffordshire County Council has not shown an increased demand for turning movements at these junctions, as a result of the Proposed Development. With the majority of vehicles accessing	N

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as Ivy house Lane/Claygates Road and Four Crosses.	the Site from the motorway network, with only a minimal number of local trips using the A5 past Ivy House Lane, Claygates Road or Four Crosses. Traffic accessing WMI from Telford and the west would be advised to use the signed route which would be via the M54/A449.	
Suggestion: Implementing road speed reduction and other traffic calming measures. Specific requests included on Wolgarston Way in Penkridge and the A449.	<p>With the exception of amending the speed limit at Vicarage Road at the location of the proposed roundabout from the National Speed Limit to 40mph, no speed limit changes are proposed. The A449 is a main trunk road managed by Highways England and traffic calming measures are not appropriate for this type of road. The A449 has an appropriate speed limit for the road classification, and enforcement of speed limits on the highway network would be a police matter.</p> <p>With regard to Wolgarston Way, no traffic associated with WMI would be expected to use this road. Notwithstanding this, should localised speeding issues be attributed to WMI traffic, the Contingent Traffic Management Fund (as set out in Document 6.2, Technical Appendix 15.01, Section 5) may be used to carry out local speed surveys, and in consultation with the local highway authority, fund amendments to local speed limits.</p>	Y
Suggestion: No site access along Station Road/Vicarage Road.	As part of the local mitigation measures, it is proposed that a right turn ban from the A449 into Station Drive will be introduced to ease local concerns of 'rat running' traffic through this route. Whilst Vicarage Road will provide access to warehousing, the Vicarage Road Link Road would not be offered for adoption to Staffordshire County Council to minimise its use by non WMI traffic.	N
Suggestion: Ban HGVs on A5 and A449 between	As set out in the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-appendix I), HGVs will be directed to follow the signed	N

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Summary of responses	Regard to responses (section 49)	Change
<p>Gailey and J13 and the A41 to reduce 'rat-running'.</p>	<p>approach to WMI from the strategic road network. Banning HGVs from the A5 and A449 would limit the potential use of the Site access points. As part of the transport mitigation measures, HGVs associated with WMI will be banned from using the A449 through Penkridge.</p>	
<p>Suggestion: Traffic lights at the Four Crosses.</p>	<p>Traffic modelling agreed by Highways England and Staffordshire County Council has not shown an increased demand for turning movements at this junction, as a result of the Proposed Development. With the majority of vehicles accessing the Site from the motorway network, only a minimal number of local trips would be using the A5 past the Four Crosses. Traffic to WMI from this section of the A5 would be signed via Vicarage Road and the A5/Site access junction. Refer to Document 6.2, Technical Appendix 15.01, Sections 5 and 9.</p>	N
<p>Suggestion: Include footpaths along Straight Mile.</p>	<p>Proposed improvements to pedestrian facilities surrounding the Site are set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 5). At grade pedestrian crossing facilities are proposed in order to provide access to the paths within the proposed Calf Heath Community Park. It is also proposed that new footpaths at the junction of Straight Mile / Kings Road / Woodlands Lane together are provided, with crossing facilities. If a further need is identified, this could be delivered via the Contingent Traffic Management Fund.</p>	N
<p>Concern that WMI tenants will not be required to use the railway.</p>	<p>Such a provision has not been required on other schemes for the simple reason that occupiers would not accept such a restriction on their business operations. It has been shown and tested in previous SRFI projects that forcing tenants to use the rail will deter many from coming to a site, but the strength of the offer at WMI is that it can offer good rail and road connections.</p>	N

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Summary of responses	Regard to responses (section 49)	Change
	<p>Without WMI existing logistics operations are likely to leave the area in increasing numbers, as witnessed with DX Logistics at Essington. When lease renewals occur, firms located in the area may be forced to leave the region and go to locations where high quality logistics operations provide adequate land supplies.</p> <p>The provision of the rail facility will encourage and attract occupiers to use rail and, as evidenced from other rail-served schemes, the availability of rail is one of the key reasons why an occupier locates to such a scheme. The s106 obligations will support a rail coordinator's role to develop use of the rail terminal. Kilbride has a long record of encouraging and persuading new users to switch to rail, which is a strength of the proposed WMI proposals.</p>	
Comment that no evidence for how rail freight will alleviate traffic issues in the immediate area.	The Transport Assessment (Document 6.2, Technical Appendix 15.01) demonstrates that, with the introduction of specific and tailored highway improvements, the highway network can accommodate the additional traffic associated with the Proposed Development. Whilst the rail freight may not alleviate local traffic, the number of HGV miles removed from the national road network from transferring freight movements from road to rail provides relief to the national network.	N
Concern that the existing rail line and the West Coast Mainline railway are already busy or at capacity and will not able	The long-term strategy for the development of the national rail network is based in part on forecast growth in freight traffic arising from the expansion of the network of SRFIs. The Government has endorsed this approach. The Department for Transport has also stated that one of the benefits of HS2 will be to release capacity on the West Coast Main Line for additional freight trains. In the first	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
to cope with the additional rail freight.	phase of development of SRFIs, a relatively small number of freight trains are generated initially (approx. four per day), reflecting the establishment of occupiers on site and growing familiarity with and use of the rail facilities and services. A pathing study has been carried out for WMI with Network Rail's support, and has identified the capacity needed to accommodate the emerging requirements of the Site. Further growth in the medium to long term would then align with the long-term national strategy to expand network capacity, including the phased implementation of HS2.	
Concern that the Proposed Development could result in railway disruption for passenger services.	Network Rail is wholly responsible for pathing of trains to and from WMI, and would not develop a timetable solution which in any way compromised existing passenger (or freight) services. Paths for new trains to and from WMI would be applied for by the freight train operating companies (not by FAL) through established industry processes, which have been used successfully by other SRFIs over the last 20 years. Please refer to the Rail Operations Report (Document 7.4) which provides further information.	N
Concern that many of the trains serving the Site would have to pass at night, due to an already busy line during the day.	The long-term strategy for the development of the national rail network is based on further significant growth in passenger and freight traffic. The Government has endorsed this approach. This will inevitably require greater use of off-peak and overnight periods as traffic levels rise, regardless of whether or not WMI is developed. The gradual increase in traffic to and from WMI will occur over several years, against a much larger background level of rail traffic throughout the day, such that for every year of operation, any new traffic arising from WMI will only form a small element of total traffic travelling along the West Coast	N

Topic: Transport and Access		
Summary of responses	Regard to responses (section 49)	Change
	Main Line. Please refer to the Rail Operations Report (Document 7.4) which provides further information.	
Suggestion: the Site should link to HS2.	The HS2 route is for the Government to decide; however, HS2 will be a predominantly a high speed passenger line.	N
Suggestion: use the East Coast Rail line instead as it is more suitable for freight traffic.	A location on the East Coast Mainline cannot service the WMI catchment area, as set out in the Alternative Sites Assessment (Document 7.2). The West Coast mainline is one of the country's main freight arteries.	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
<p>Concern about the provision (or lack thereof) of accommodation for waiting HGVs and for lorry drivers taking their legally mandated rest breaks.</p>	<p>Through the Site Wide HGV Management Plan (Document 6.2, Technical Appendix 15.01, Sub-Appendix I) which is appended to the Transport Assessment, HGV traffic using WMI will be heavily regulated and subject to stringent controls on arrival times and routing arrangements.</p> <p>All HGV traffic will be subject to a Vehicle Booking System, ensuring arrival and departure times for HGVs are managed. The provision of on-site early arrival bays with HGV driver welfare facilities will ensure drivers who arrive on Site prior to their allocated arrival times can use the Site facilities. There is potential for over 3,000 HGVs to be held on Site at any one time, and Variable Message Signs on Site will communicate information updates.</p> <p>With these facilities in place, it is deemed unlikely that local services would be used as rest areas, therefore lorry parks and service station areas between 20 to 60 kilometres away from the Site have been identified.</p> <p>HGVs will also be provided with pre-trip directional information supplemented by directional road signs on the strategic road network. With the location of WMI on the Strategic Road Network (SRN), HGV drivers will be able to use the most appropriate road networks.</p> <p>HGVs accessing WMI will be banned from using the A449 via Penkridge through the use of Automatic Number Plate Recognition system. Tenants of WMI will be required to sign up to a management charter, and will be subject to financial penalties should HGVs associated with their operations be using the A449</p>	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
	<p>through Penkrige. With the upgrade of a SMART network on the M6, the motorway will also be more resilient should lane closures occur.</p> <p>A Transport Steering Group will be set up to enforce and manage HGV traffic using WMI, of which Staffordshire County Council and Highways England will be a part.</p> <p>The Transport Steering Group will disseminate relevant traffic information such as planned roadworks resulting in road closures to warehouse operators, as well as monitor any incidents of anti-social behaviour or community concerns raised by members of the public through the Travel Plan Coordinator. It will also have the ability to take appropriate action if attributed to WMI.</p>	
Comments that access for trains to the Site is poor – for example there are no rail links to the north of Four Ashes	The Site will have a rail link facing south and north, optimising the rail connection to the mainline. By its nature, the SRFI needs to be near the most suitable rail lines, which is a strength of the Site.	N
Concerns that some warehouses a long distance from the rail terminal, meaning the new public link road will be busy with freight being moved and may not be	<p>All warehouses would be within close proximity of the intermodal terminal, and the furthest that any HGV or tugmaster unit would need to travel on the new public link road is approximately 750m.</p> <p>The modelling work undertaken for the Proposed Development has considered the use of the new public link road by warehouse occupiers, and there is</p>	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
able to help alleviate congestion as proposed.	sufficient capacity for both occupiers and the public to use it allowing for acceptable flows.	
Suggestion: include a parking area to avoid unnecessary parking in the local area by both HGVs and employee cars.	The car parking requirements for the Proposed Development will be accommodated on each individual plot. The parking ratios provided can be found within the Design and Access Statement (Document 7.5).	N
Suggestion: bins and toilet facilities to prevent litter and urine/faeces spoiling the area.	Each development plot will have their own adequate toilet and welfare facilities for the number of employees associated within the building. The infrastructure areas will have litter bins appropriate for the need, such as adjacent to the bus stops. Additional detail can be found in the Design and Access Statement (Document 7.5) .	N
Comment that land allocated for unit 1020 could be reallocated for rail terminal expansion.	The rail terminal area has been designed to incorporate all the area required to accommodate 10 trains per day. Sufficient space has been allowed for parking and container storage.	N
Concern that Four Ashes Chemical Works is a health and safety hazard and the Proposed Development is within the 5 mile 'blast radius'.	The parameters for the Proposed Development accord with land use zoning associated with existing chemical works. The Health and Safety Executive (HSE) has been consulted on the Proposed Development and does not object to the scheme. According to HSE there is no '5-mile blast zone' around the chemical works. The SI plant operates within UK and EU regulations and laws. Its Comah zone has been reviewed in the Environmental Statement (Document 6.2).	N

Topic: Design, Illustrative Masterplan and phasing		
Summary of responses	Regard to responses (section 49)	Change
Suggestion: link Zone A5 and A7 via an underpass under the road.	Creating an underpass to link these two zones would not be considered a viable option due to land constraints and costs involved. To eliminate vehicular through-trips via the Site, the Vicarage Road Link Road would not be offered up to Staffordshire County Council for adoption.	N
Suggestion: no bus lanes.	All roads surrounding the Site operate within capacity with the Proposed Development in place; with no queueing delays at the Site access junction, there is no requirement for bus lane measures to improve the efficiency of bus services. Refer to the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 9).	N

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
The existing community facilities at the Site are adequate and the rural nature of the area means the Community Parks would be unnecessary.	The Community Parks are considered to be suitable in character as informal and largely passive recreational areas that will fit appropriately into their landscape context. Both Parks adjoin the canal corridor and include existing trees and other planting that will be managed and extended with new planting. The new footpaths will provide alternatives to the limited number of nearby routes at present. The Community Parks will have key biodiversity functions with opportunities to include more biodiverse habitats than currently exist in these areas.	N
Many respondents perceived the Community	FAL is committed to mitigating the impact of the Proposed Development as much as possible. The two Community Parks are part of this mitigation and are	Y

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
<p>Parks as a gesture to distract and mollify residents so that FAL could build WMI.</p>	<p>a fundamental element of the Proposed Development. They provide local access to over 44 hectares (109 acres) of open space suitable for walking, cycling, running and other activities which will be linked by new footpaths to the existing canal towpath.</p> <p>Attenuation swales and lagoons required for the Proposed Development will be located within the parks and provide habitat for local wildlife. The Community Parks will be maintained by a management company set up to provide maintenance and security for the whole development.</p> <p>An extension of Calf Heath Community Park was proposed to the south to provide improved connectivity and accessibility and to create a more cohesive and connected park. The additional land also offers opportunities to enhance the canal side environment and to provide landscape and visual benefits. This was consulted on during Stage 2a Consultation.</p>	
<p>Suggestion: the Community Parks should be delivered without the Proposed Development.</p>	<p>Delivery of parks without the Proposed Development would be the remit of local authorities.</p>	N
<p>The Community Parks situated by a road and in an industrial setting, caused many to believe they would not be used</p>	<p>The Community Parks have been designed such that they are large enough to provide a considerable buffer away from the surrounding road network and the proposed Site roads. The perimeter landscaping comprising bunds and trees will also screen the parks from major roads. A number of successful parks of a similar nature and character have been established around industrial and</p>	Y

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
due to resulting poor air quality and noise.	employment sites, including the Country Park at Prologis Park, Coventry. Despite being in close proximity to industrial uses, they still provide accessible green spaces that can be used for walking and other passive recreational activities. They will provide alternative walking routes to the limited available footpaths at present. These measures have been enhanced by the extension of Calf Heath Community Park.	
The distance of the Community Parks away from residential properties also led to the belief they would be little used.	The Community Parks are intended to be principally for local community use and are not intended to draw large numbers of visitors. We believe that they will provide local people with alternative walking routes and areas for informal recreation. They are also to provide other localised ecological and environmental benefits which will not reflect the level of footfall.	N
Concern that the distance of the Community Parks from populations would require people to drive to use it, further exacerbating traffic and air quality concerns.	From the traffic modelling undertaken, traffic associated with the Proposed Development that passes the Community Parks is not predicted to be so severe to discourage use of the Community Park. Within the transport mitigation measures proposed in the Environmental Statement (Document 6.2, Chapter 15) , pedestrian and cycle facilities are proposed around the Community Parks, in addition to a network of Permissive Paths.	N
Concern was raised that due to the phasing and timescale of the plans, the community will not benefit	The proposed Croft Lane Community Park forms part of the indicative first phase of the development and a large section of Calf Heath Community Park would come forward in the second phase of development. These have been	Y

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
from the Community Parks for 20+ years. Suggestions were made that the DCO should guarantee the timing of implementation.	brought forward in the development phases compared to the indicative phasing plan provided as part of the Stage 2 Consultation.	
Suggestion: local people should be engaged in the planning, design and management of the Community Parks.	A liaison committee dealing with a number of aspects of the Site will be set up involving local representatives. This will be secured by a requirement in the Development Consent Order.	N
Suggestion: additional park facilities including: accessible paths for wheelchairs and buggies, cycle tracks linking to minor roads, refreshment or cafes, a craft shop, a play area, a quiet area for the elderly, a dog-walking space, adequate parking, a wild flower meadow,	The two Community Parks will provide local access to over 44 hectares (109 acres) of open space suitable for walking, cycling, running and other activities which will be linked by new footpaths to the existing canal towpath. Attenuation swales and lagoons required for the development will be located within the parks and provide habitat for local wildlife. Additional information on the parks has been included within the Design and Access Statement (Document 7.5).	

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
ponds, picnic areas and crushed stone paths.		
Concern about the security of the Community Parks; requests for the Community Parks to be monitored by 24-hour security; and concern that the Site might provide travellers with an area to stay and cause disruption to the community.	<p>If a DCO is granted, the management and operations of the Community Parks and Estate will be set out in a relevant detailed Reserved Matters application and will include measures to deter crime through design and management. Estate management will ensure that there is no unauthorised occupation of the Site.</p> <p>FAL has proposed to create an Estate Management Plan to secure the long-term management and maintenance of the Community Parks by the Estate Management Company. This will be set out in the s106 Agreement. The long term upkeep of the parks will also be funded by FAL.</p>	N
The longevity of the Community Parks was also an issue with the suggestion that developers should maintain them in the long term as there were concerns that the local authority does not have the funds for upkeep. There were alternative suggestions that the		

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
Community Fund could be used for their upkeep.		
Wildlife habitats as an issue were raised, and it was requested that the Community Parks should create and protect as many wildlife habitats as possible.	The indicative phasing of the Proposed Development has been amended to mitigate loss of habitat and the Community Parks will have key biodiversity functions with opportunities to include more biodiverse habitats than currently exist in these areas.	N
Suggestion: the right hand side of Vicarage Road should be opened up as a Community Park with nature areas and sections where residents could walk or run safely away from the roads.	<p>The Community Parks proposed will provide significant access to residents allowing a variety of activities to take place. The Calf Heath Community Park occupies a sizeable area to the north and south of Straight Mile and while it does not extend along the immediate southern side of Vicarage Road, it does occupy an appropriate area in relation to access for the local community and relationship with the canal side. It also supports the 'buffering' and mitigation of the Proposed Development.</p> <p>Following Stage 2 Consultation, additional land to the south of Calf Heath Community Park was added to improve connectivity and accessibility and to create a more cohesive Park environment. The additional land will also offer opportunities to further enhance the canal side and to provide landscape and visual benefits. This was consulted on during Stage 2a Consultation.</p>	Y

Topic: Community Parks		
Summary of responses	Regard to responses (section 49)	Change
Concern about travellers moving in to the new parks and not leaving.	This could happen now, but in future WMI estate management will deal with these types of events. This is also a matter that would be looked at more closely during the detailed design stage. There are various physical measures that can be put in place alongside the active management of the parks to deter travellers.	N
Concern that the Proposed Development would impact on facilities already in use by the community including the canal footpaths and Calf Heath Reservoir.	The effects upon users of these facilities have been considered as part of the Environmental Statement (Document 6.2). Measure to mitigate any adverse effects have also been included within the proposals. Inevitably, there will be some adverse effects as detailed in the Environmental Statement (Document 6.2). However, these have been minimised as far as possible and other measures put in place to extend activities e.g. footpaths within the Community Parks.	N
Some respondents expressed support for the Community Parks on the basis that it would help counteract the loss of Green Belt.	The support is welcomed.	N

Topic: Community Fund		
Summary of responses	Regard to responses (section 49)	Change
The Community Fund should be given as a lump sum to local residents as compensation for falls in property value or health impacts.	Compensation arrangements are set out in the Compensation Code based on legislation, case law and best practice. The relevant legislation provides that those whose property will be directly affected by the scheme through land take or the acquisition of new rights are entitled to compensation under the aforementioned Compensation Code. FAL has worked closely with those affected landowners to negotiate compensation terms if this is appropriate. Any party who feels that they may have a claim for compensation is recommended to seek professional advice and/or contact FAL who will be happy to discuss their individual situation.	N
Sound insulation or double glazing.	A voluntary noise mitigation package is being proposed in the DCO application.	Y
Upgrade, maintain and repair the road surfaces.	As part of the mitigation measures set out in the Transport Assessment (Document 6.2, Technical Appendix 15.01, Section 5) a Contingent Traffic Management Fund will be created as part of the Proposed Development. Should degradation of the carriageway surfacing or damage to the local street furniture be attributed to the Proposed Development, this fund may be used for carriageway surfacing treatment or replacement of street furniture. Notwithstanding this, local roads are managed by Staffordshire County Council, who are responsible for ensuring they are upgraded, maintained and repaired where necessary.	Y
Upgrade the tow-paths around Coven, Calf Heath and Penkridge or renovate sections of the Hatherton	Restoration or renovation of sections of the Hatherton Canal system does not form part of the proposal. A variety of enhancement measures for the Staffordshire and Worcestershire Canal will however be included. This will include the removal of redundant pipe bridges and bankside wildlife	Y

Topic: Community Fund		
Summary of responses	Regard to responses (section 49)	Change
Canal system where it is feasible to do so.	<p>improvements. Consultation with the Canal and River Trust (CRT) has considered many aspects of the canal and canal side environment. This has included the treatment of the towpath, both within the Site and along the broader length of the canal. A package of upgrade measures to the towpath are proposed and will be agreed in detail in due course with the CRT. This includes a Canal Enhancement Scheme comprising:</p> <ul style="list-style-type: none"> • Works to improve the towpath by resurfacing it with a suitable surface (i.e bound/compacted gravel such as Breedon gravel type); • The creation of two new pedestrian connections to the towpath from Croft Lane Community Park; • Improvements to the existing pedestrian access points at the A5, Hoppe Roundabout and Station Road; and • The introduction of interpretation boards and signage. <p>The full package of measures is set out in the Cultural Heritage chapter of the Environmental Statement (Document 6.2, Chapter 9).</p>	
Use to improve local transport links such as building a passenger train station.	The Proposed Development is located within 3 miles of Penkridge Station, therefore even with the proposed employment generation that it will bring, insufficient latent demand would exist to justify a new passenger station at this location and introducing an additional station call into the existing passenger timetable.	N

Topic: Community Fund		
Summary of responses	Regard to responses (section 49)	Change
Suggestion: visitor centres to improve understanding of rail freight operations.	The suggestion is noted, but there are no proposals for a rail freight visitor centre. Like other SRFIs, visitors will be welcomed by the terminal operator and its activities will be widely marketed throughout the UK.	N
Use for a warm homes initiative. Use to fund mental health services. Use on community sports facilities such as a swimming pool, a gym or a national indoor stadium. Invest fund in local schools. Use to develop an Aldi supermarket.	The fund can only be used to support measures relevant to the impact of the WMI proposals. None of these suggestions meet this requirement.	N
Suggestion: improve the canal paths by fully paving them between main centres.	Towpath improvement measures have been discussed with the Canal and River Trust and will be undertaken in accordance with a package of proposals.	Y
The Community Fund does not outweigh the negative impact the Proposed Development.	<p>The careful design and assessment of the WMI proposals has ensured that they have evolved to respond sensitively to the characteristics of the surrounding area and, in particular, to limit and mitigate the effects of the development, including pollution (noise, light, air and others), as required by the NPS.</p> <p>The benefits of the Proposed Development substantially outweigh the residual adverse effects, whilst the need for the development is strongly established in</p>	N

Topic: Community Fund		
Summary of responses	Regard to responses (section 49)	Change
	principle in the National Networks NPS and specifically in this case through independent study as well as the applicant's own assessment.	

Topic: Canalside Environment		
Summary of responses	Regard to responses (section 49)	Change
There were general concerns about WMI's impact on facilities already in use by the community including the canal and footpaths.	There will be some adverse effects upon users of these facilities and these have been considered in the Environmental Statement (Document 6.2). However, these have been minimised as far as possible and other mitigation measures put in place to extend activities like footpaths within the Community Parks.	N
Wildlife will not be adequately protected along the canal corridor.	The canal corridor has been considered in ecological assessment and included in mitigation measures proposed, especially in relation to otters.	N
Noise will ruin the tranquillity of the canal setting.	There are no objective measures of tranquillity with regards to noise. The impact of noise on the canal is considered in Chapter 13: Noise and Vibration of the Environmental Statement (Document 6.2).	
Concern that the main access road runs too close to the canal, introducing constant noise from traffic	Following the Stage 1 Consultation FAL moved the access road on the A5 east away from the canal. This was done following discussions with Highways England. If the junction were to move any further east it would impact on the operation of Junction 12 of the M6 which would be unacceptable.	

Topic: Canalside Environment		
Summary of responses	Regard to responses (section 49)	Change
and destroying the tranquillity of the canal.		
Concern about the visual impact of the Proposed Development on the canal and suggestion that screening between the Site and canal is inadequate.	The visual effect of the Proposed Development on users of the canal is considered within the Environmental Statement (Document 6.2, Chapter 12, Visual Receptor P1). The scheme will be visible to varying extents from relatively short stretches of the canal. The inclusion of extensive landscape areas and planting (conserved and proposed), including mounding between the canal and the proposed units, will mitigate and minimise the resulting visual effects.	N
Concern that the boatyard at Gailey Lock could be affected by noise and traffic thereby rendering this canal section unattractive for mooring and damaging the canal's tourism value.	Consultation with the Canal and River Trust has considered many aspects of the canal and canal side environment. This has included the effects and mitigation proposals for the canal. The proposed units and associated infrastructure will generally be set back a notable distance from the canal, beyond broad landscape buffers including mounding and planting. The level and extent of mitigation is considered to be appropriate.	
All screen bunding and landscape planting around the canal corridor should be undertaken in advance of construction, and semi-mature trees used where possible to reduce the time	The Proposed Development will be brought forward for construction in phases. FAL will plant screening and develop landscape bunding that is appropriate to mitigate the development proposed as part of each phase. A detailed mitigation scheme will be developed considered as part of reserved matters.	N

Topic: Canalside Environment		
Summary of responses	Regard to responses (section 49)	Change
taken for screening to become effective.		
Position of the attenuation pond shown between the canal and mounding near to unit 3030 may need to be moved to between the mounding and the road, to optimise sight lines/prevent canal views of this unit.	The request to move the attenuation pond has been considered but the benefits in doing so are questionable. There is a topographical fall from the proposed carriageway towards the canal which would negate the desired effect by reducing the absolute height of the mound. Sight lines from critical viewpoints have been considered in the design and the intention has been to keep the area adjacent the canal relatively open as part of the amenity and ecology mitigation proposals.	N
Request for detailed cross section elevations to demonstrate the sight lines for canal users.	Additional landscape cross sections are included in the Environmental Statement (Document 6.2, Chapter 12, Figure 12.12). These include a number of cross sections that illustrate the proposed development in relation to the canal.	N
Canal Bridge to be clad in red brick to match the historic vernacular architecture of the canal	The Canal Bridge will be clad in red brick.	N

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses (section 49)	Change
The Environmental Assessment was inadequate or should have provided more detail, especially around Calf Heath Reservoir.	Mitigation measures are shown on the Parameters Plans (Documents 2.5-2.7). These drawings control the location, height and scale of potential development zones in relation to Calf Heath Reservoir, in addition to green infrastructure and associated mounding. A landscape buffer zone located between Calf Heath Reservoir and the development land, in part mounded and planted, will provide visual screening from the lower areas of the buildings where there will be more activity. The building cladding design has been set out within the Design and Access Statement.	N
Major concerns about changes to the wind patterns, which could undermine sailing viability on Calf Heath Reservoir.	A desk-based study (Document 6.2, Technical Appendix 14.01) has concluded that sailing quality is unlikely to be affected for 70% of the time throughout the year. For the other 30% of the year, there will be some impact due to obstruction of some western winds. The effect, however, would be reduced by minimising landscaping and by limiting the height and number of buildings. Following the DCO application submission, when the structural design of the Proposed Development has been determined, it will be used to conduct a wind tunnel test to measure the changes in wind speed, direction and turbulence around Calf Heath Reservoir and to establish the effects of the Proposed Development.	Y
Request for the monitoring of particulates and CO2 levels in the vicinity of Greensforge Sailing Club.	The Environmental Statement (Document 6.2, Chapter 7) includes a detailed air quality assessment which considers car and HGV movements associated with the Proposed Development. The air quality assessment considers potential emissions against recognised air quality standards. The assessment does not specifically cover Greensforge Sailing Club; however, it does assess residents in close proximity of the sailing club, as residents are a more sensitive receptor	N

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses (section 49)	Change
	than shorter term amenity users. In accordance with guidance, the air quality assessment will consider the 10 priority air pollutants. This does not include emissions of CO2, but CO2 will be considered in overall terms regarding potential carbon savings.	
Concern for the safety of children and vulnerable sailors at Greensforge Sailing Club, owing to wind turbulence effects.	There is a chance that wind turbulence levels could change on Calf Heath Reservoir; however, this will not be clear until the structural design has been determined. At this point a wind tunnel test will be conducted to measure the changes in wind speed, direction and turbulence around the reservoir to establish the effects of the Proposed Development.	Y
Concern that visual impact of warehouses will reduce sailors' enjoyment of site.	Existing views from the reservoir are dominated by the surrounding mature woodland and trees and traffic on the A5 and Junction 12 approach. The clearest views of the Proposed Development will be from the western end of the reservoir, where close views will be possible to the nearest building(s). New mounding and woodland/tree planting will take place around these parts of the Site's perimeter and will offer some filtering/screening of the lower active parts of the development, although the higher parts of the building(s) will remain clearly visible. More detail can be found in Appendix 12.6 of the Landscape and Visual Effects Chapter of Environmental Statement (Document 6.2, Chapter 12, Appendix 12.6 , see Receptor V1 of the Visual Effects table), and in the Design and Access Statement (Document 7.5), which shows mitigation measures on the Parameter Plan. These drawings control the location, height and scale of the potential development zones in relation to Calf Heath Reservoir in addition to green infrastructure and associated mounding.	N

Topic: Calf Heath Reservoir		
Summary of responses	Regard to responses (section 49)	Change
Concern on the Proposed Development's effect on water levels.	<p>The surface water design has included a study of how the surface water and ground water currently flow around and away from the Site; the new strategy seeks to mimic the flow routes but includes strategically placed flow controls and open water bodies which will reduce the flow rate and store rainwater during extreme storm events. The result will be a reduction in 'flash flood' effects in watercourses downstream of the Site and no artificial increase of the groundwater table will take place as a result of the scheme.</p> <p>The proposals for mitigation of flooding effects are discussed in the Water and Flood Risk chapter of the Environmental Statement (Document 6.2 Chapter 16).</p>	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
Consultation period was too short.	Stage 2 Consultation (statutory) was undertaken for a period of 8 weeks between 5 July and 30 August 2017. The statutory minimum is four weeks. FAL considered the length of consultation to be appropriate to accommodate the summer holiday period, and this was reviewed by both South Staffordshire District Council and Staffordshire County Council as part of the Statement of Community Consultation process.	N
Consultation was poorly advertised.	Stage 2 Consultation (statutory) was publicised widely via statutory notices in accordance with s48 of the Planning Act 2008; editorial coverage in local papers, promotional press advertising, posters at local information points, and via the project website. This was compliant with the SoCC which was published	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
	on the website on 21 June 2017, and notices published in accordance with s47 of the Act.	
Comments that the consultants were unable to answer local questions at the public exhibitions.	<p>FAL has always been open about the level of information provided for consultation, and honest in acknowledging if answers to questions were not known at the time. During statutory consultation (Stage 2), the team was aware that some further technical and development work was still required and that in some instances, it would be unable to provide the information requested.</p> <p>FAL recognises that local residents and businesses will be much better informed about local knowledge and the intelligence that the team has gained from discussing local issues with communities has been invaluable in helping to shape the proposals.</p>	N
A comment that reports were not accessible enough, for example, links were broken and there were no hard copies to take away from the drop in sessions.	<p>Technical reports were made available to view in hard copy at local information points and public exhibitions. Due to the size and number of technical documents, it was not possible to provide these to take away as hard copies. However, USB memory sticks containing all consultation documents including technical reports were handed out at public exhibitions and posted to anyone wishing to access the documents on request.</p> <p>A full suite of consultation documents and technical reports was also available on the project website to download. For a short period of time, the links to a few documents did not work, but this was quickly rectified and anyone who had enquired about the links was advised when this was resolved.</p>	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
Comments that the consultation should have been wider including a request that Cannock residents be included in the consultation.	<p>Statutory consultation (Stage 2) was open to everyone who wished to participate, and FAL encouraged any members of the public to engage with the team and to provide feedback.</p> <p>In preparing for statutory consultation (Stage 2), FAL prepared a Statement of Community Consultation which set out how they planned to consult, and this was reviewed and supported by both South Staffordshire District Council and Staffordshire County Council.</p> <p>Part of the SoCC identified a Consultation Zone, within which all residents received consultation information in the post. The zone extended approximately 3km/1.9 miles from the Site boundary, with extensions to ensure villages or groups of houses were wholly included. This zone included the communities which are most likely to experience any impact from WMI and for this reason, it did not include Cannock residents. However, the consultation was widely publicised through editorial coverage in local papers, statutory notices, press advertising to promote access to information and consultation events, posters, local information points and via the WMI website.</p>	N
Concerns that FAL did not appoint independent consultants to undertake, for example, the traffic assessment.	Traffic flows associated with the Proposed Development have been assessed and agreed with Staffordshire County Council and Highways England, as the local highway authorities. Traffic modelling has been carried out by two independent consultants (Atkins & Systra) to ascertain the impact of the Proposed Development on the highway authority networks. For further information please refer to the Transport Assessment (Document 6.2, Technical Appendix 15.01, Sections 8 and 9).	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
Complaints that using estimates or preliminary information is not good enough.	The information and technical reports provided for statutory consultation (Stage 2) were highly detailed documents which were the culmination of surveys, technical and development work following the Stage 1 Consultation. As part of the development and pre-application process, it is necessary, and the norm, to provide estimates or preliminary information when further work is required before application submission.	N
Not enough detail provided in consultation documents, assessments and the Draft Environmental Statement.	The information and technical reports provided for statutory consultation (Stage 2) were highly detailed documents which were the culmination of surveys, technical and development work following the Stage 1 Consultation. As part of the development and pre-application process, it is usual for further work to be completed before Application submission and FAL has undertaken this work for its Application.	N
The Draft Environmental Statement and Transport Assessment were inadequate and misleading, and included selective quotations from the National Policy Statement (NPS).	The Draft Environmental Statement and Transport Assessment were highly detailed documents which were the culmination of surveys, modelling, technical and other development work following Stage 1 Consultation. The NPS is Government policy, and it was appropriate to use quotations for the purposes of explaining the context within these documents.	N
Comments that details were hidden in the Draft Environmental Statement	In providing summary documents, FAL wished to provide information in an accessible format and to give an overview of the detailed information contained in technical documents such as the Draft Environmental Statement. In	N

Topic: Consultation		
Summary of responses	Regard to responses (section 49)	Change
and not displayed in summary documents.	providing information in these formats, it was FAL's intention to encourage everyone to access it at a level most suited to their needs.	
Concerns that problematic issues were deliberately ignored.	Following Stage 1 Consultation, FAL considered all the feedback received in developing the Proposed Development. An Interim Consultation Report was published during statutory consultation (Stage 2) explaining how feedback had effected changes as well as explaining why the Team was unable to incorporate changes.	N

Topic: Other		
Summary of responses	Regard to responses (section 49)	Change
The Proposed Development could encourage the import of cheap foreign goods.	<p>The Proposed Development will enable efficient logistics and the sustainable use of rail in the movement of goods. Freight will be both domestic (i.e. within the UK) and international; rail does allow freight to be moved between inland location and the ports cost effectively, both export and import.</p> <p>The UK is a trading nation and relies for much of its wealth on that activity. WMI is targeted at servicing the existing flow of goods in the UK and will not affect the source of goods.</p>	N
General, non-specific concerns about the nature of Four Ashes Ltd (FAL).	Without understanding specific areas of concern, it is difficult for FAL to respond to these responses.	N
Comments that the only individuals who stand to	FAL is committed to delivering a rail-served development which will bring significant sustainable social and economic benefits to South Staffordshire, the	N

<p>benefit are the land owners and shareholders of the Proposed Development.</p>	<p>Black Country and the wider region, through responsible design and by taking into account community interests and environmental considerations.</p> <p>A compelling need for an expanded network of SRFIs across the country is firmly established in the National Networks NPS. The relevant regional evidence base also identifies a specific need for a new Regional Logistics Site (RLS) / SRFI in the West Midlands region as far back as 2004. There are currently no new known, proposed or planned SRFIs in the West Midlands and the shortage of available warehouse floor space is only getting more severe. A full summary of the need for an SRFI is set out in the Planning Statement (Document 7.1A, Chapter 5).</p>	
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11.7. Representations received after the deadline

11.7.1. The deadline for responding to the Stage 2 Consultation was 30 August 2017. A small number of section 47 responses were received and accepted after this date. These were included in the analysis of feedback provided early in this chapter.

11.8. Conclusions

11.8.1. This Chapter of the report explains FAL's regard to consultation responses under section 47 and is intended to fulfil the requirements under section 49(2) of the Act with regard to consultation with the community under section 47.

12. Stage 2 Consultation – responses received under section 48

12.1. Introduction

- 12.1.1. This Chapter reports on the responses to publicity under section 48 consultation with the local community, as well as Four Ashes Limited (FAL)'s reply to and, where applicable, incorporation of and regard to the issues raised in the responses.
- 12.1.2. Section 49(2) of the Act requires FAL to have regard to relevant responses to the consultation and publicity that has been undertaken under sections 42, 47 and 48 of the Act. A relevant response for the purpose of section 48 is defined in section 49(3)(c) as a response to publicity under section 48(2) that is received by FAL before the deadline set out in the publicity.
- 12.1.3. FAL acknowledges there is a clear expectation that issues raised during consultation should influence the final application. This Chapter demonstrates that FAL has acted reasonably in fulfilling its requirements under section 49 of the Act.

12.2. Overview of responses

- 12.2.1. Responses were received in relation to section 42 and section 47 consultation. These are summarised in Chapters 10 and 11 of this Report. It is not clear whether any of the responses were sent as a result of having seen the section 48 notice. That cannot be easily ascertained, unless a respondent had decided to express that they were responding specifically as a result of having seen the section 48 notice in the newspaper. No respondent specifically referred to the section 48 notice. Accordingly all comments have been considered in Chapters 10 and 11. FAL therefore considers that it has fully complied with its duty under section 49 to have regard to all responses.

12.3. Conclusions

- 12.3.1. For reasons explained in paragraph 12.2.1, this Chapter of the report fulfils the requirements under section 49(2) of the Act with regards to publicity under section 48.

13. Stage 2a Consultation

13.1. Introduction

- 13.1.1. In response to feedback from the Stage 2 Consultation, Four Ashes Limited (FAL) refined the Proposed Development in respect of specific changes to the Site's Order Limits.
- 13.1.2. This entailed changes to the proposed Calf Heath Community Park to the south of the Site and to proposed Order Limits to the north of the A5.
- 13.1.3. The consultation proposed an increase in the area of Calf Heath Community Park to improve connectivity and accessibility by extending the boundaries and offering a more cohesive park. The additional land also offered opportunities to enhance further the canal-side environment that would be beneficial in landscape and visual terms and to the wider environmental impact.
- 13.1.4. Following further discussions with the utility provider, an additional triangle of land was identified north of the A5 to facilitate the works necessary to achieve the undergrounding of 132kv cables, primarily for temporary works and access while undergrounding work takes place. This would require a change to the Order Limit but with no additional environmental impacts of the scheme.

13.2. When consultation took place

- 13.2.1. Consultation took place between Thursday 23 November 2017 and Tuesday 2 January 2018, a period of 41 days.

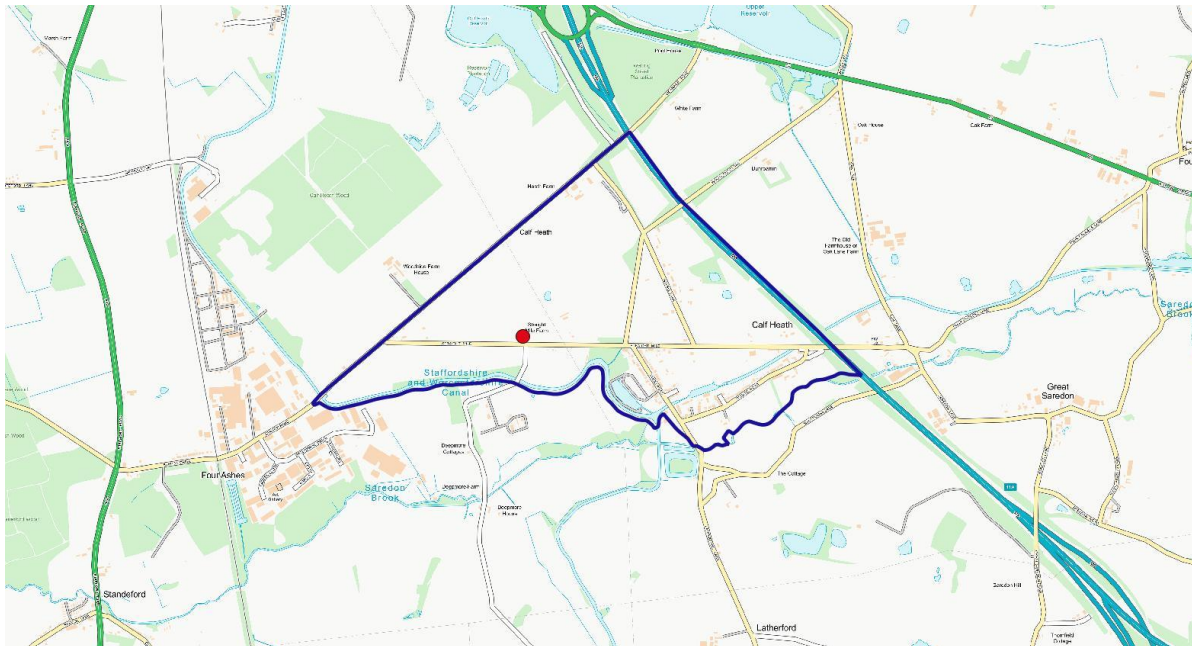
13.3. Who was consulted

- 13.3.1. In addition to consulting statutory consultees (section 42, 43 and 44 consultees), it was felt that focused consultation with local residents and businesses living and working close to Calf Heath Community Park may also wish to express their views (section 47) as well as members of the public.
- 13.3.2. On this basis a Consultation Zone was identified containing 151 residential and business addresses and taken from the Royal Mail Post Address File. The Zone was considered to be proportional to the size of the proposed change and was agreed with South Staffordshire District Council and Staffordshire County Council. A plan showing the extent of the Consultation Zone can be found

below with the blue lines indicating the boundary and the red dot showing the change to the Order Limit boundary.

- 13.3.3. The boundaries of the Zone are those of the Hatherton Parish Council boundaries to the south and north, and the M6 to the east. The Zone includes the community of Calf Heath, the closest community to the change.

Figure 12: Stage 2a Consultation - Consultation Zone



13.4. How consultation was carried out

- 13.4.1. A letter accompanied by Order Limit plans and Illustrative Masterplans was sent to the consultees below in addition to emails with this information. Copies of the letter and plans can be found at Appendix R.

Local authorities (section 43)

- 13.4.2. All section 43 local authorities were sent a letter by first class Royal Mail explaining the rationale for both Order Limit changes to the north and south of the Site and details of how they could respond.

Parish councils (section 42)

- 13.4.3. All parish councils who had previously been consulted or responded to the Stage 2 Consultation were sent a letter by first class Royal Mail explaining the rationale for both Order Limit

changes to the north and south of the Site and details of how they could respond.

Other statutory consultees (section 42)

- 13.4.4. Relevant statutory consultees were sent a letter by first class Royal Mail explaining the rationale for both Order Limit changes to the north and south of the Site and details of how they could respond.

PILs (section 44)

- 13.4.5. Individuals and organisations with an interest in the land (statutory undertakers) were sent a letter by first class Royal Mail explaining the rationale for both Order Limit changes to the north and south of the Site and details of how they could respond. Emails with this information were also sent to Persons with an Interest in the Land (PILs) where they were available.
- 13.4.6. One PIL identified as the landowner for the land north of the A5 was sent a letter by first class Royal Mail explaining the rationale for the proposed Order Limit change, details of how to respond with an Order Limit plan and Illustrative Masterplan. A meeting with the landowner was also held to discuss this in more detail on 24 November 2017. A site notice was also erected in this area because the land concerned is unregistered and FAL had not seen evidence of the title information confirming the ownership position. A copy of the site notice is contained in Appendix R.
- 13.4.7. FAL also erected a number of site notices around the Site where it had been ascertained that there were interests in the Site where the beneficiary of such interests was unknown. A plan showing the location of these notices and a copy of the notices can be found in Appendix R.

District and county council members

- 13.4.8. All members of South Staffordshire District Council and Staffordshire County Council were sent a letter by first class Royal Mail explaining the rationale for both Order Limit changes to the north and south of the Site and details of how they could respond. All councillors with emails were also emailed this information.

MPs

- 13.4.9. The Rt. Hon. Gavin Williamson MP and Jeremy Lefroy MP were sent a letter by first class Royal Mail explaining the rationale for

both Order Limit changes to the north and south of the Site and details of how they could respond.

Mailing to Consultation Zone addresses

13.4.10. A covering letter outlining the rationale to the change to Calf Heath Community Park and providing details of how people could respond was sent by first class Royal Mail to residents and businesses within the Consultation Zone with an Amended Order Limit plan and Illustrative Masterplan (see Appendix R).

13.4.11. The following activities were undertaken to inform people about the consultation.

Website

13.4.12. All consultation documents were made available to download from the website: www.westmidlandsinterchange.co.uk.

Information Points

13.4.13. A copy of the covering letter, Amended Order Limit plan and Illustrative Masterplan change were made available to review at three local Information Points as set out below:

Location	Address	Opening times
Brewood Library	Newport Street, Brewood, Stafford, ST19 9DT	Monday: Closed Tuesday: 9am-1pm and 2-7pm Wednesday to Friday: 9am-1pm and 2-5pm Saturday: 9.30am-1pm Sunday: Closed
Penkrige Library	Bellbrook, Stafford, ST19 5DL	Monday: 2-6pm Tuesday: 2-7pm Wednesday: 10am-1pm and 2-5pm Thursday: 2-5.30pm Friday: 10am-1pm and 2-5pm Saturday: 9.30am-1pm Sunday: Closed
South Staffordshire District Council	Wolverhampton Road, Codsall WV8 1PX	Monday to Friday: 8.45am-5pm Saturday: Closed Sunday: Closed

13.4.14. A poster to highlight the documents was put up at each of the Information Points.

13.4.15. The Information Points were checked during the consultation period to ensure the documents were available to review.

13.5. Feedback mechanisms

13.5.1. Comments on the proposed changes to the Order Limits were sought through the existing feedback channels:

- Email – contactus@communityrelations.co.uk
- Freepost – 'FREEPOST WMI'.

13.6. Conclusions

13.6.1. This Chapter demonstrates that FAL has carried out additional consultation with all affected statutory consultees and local communities in respect of small changes to the Proposed Development. This is consistent with paragraph 72 of the Guidance on the pre-application process (see Appendix A for more details).

14. Stage 2a Consultation - responses

- 14.1.1. A total of 10 responses were received as part of the Stage 2a Consultation. These responses are summarised below.

Staffordshire County Council

- 14.1.2. Staffordshire County Council states that its only concern regarding Proposed Order Limits to the north of the A5 Trunk Road would be in relation to potential damage to hedgerows and trees. It notes that the Site boundary takes in the whole of the hedge along the road frontage, possibly taking in some mature trees and the rear boundary hedge. The Council suggests that issues of tree protection and hedge retention are considered in the Environmental Statement with the potential need for some hedge replacement.
- 14.1.3. With regard to the proposed increase in area of the proposed Calf Heath Community Park, the Council comments that impacts will need to be fully assessed in the Environmental Statement. It notes that the relocation of the proposed ponds may have an effect on drainage and that the Drainage Strategy and Masterplan should be updated accordingly to reflect all amendments.

Cannock Chase Council

- 14.1.4. The Council had no comments to make on either of the proposed changes consulted upon.

Warwickshire County Council

- 14.1.5. The Council observed that the changes proposed during Stage 2a Consultation are minor in nature and have very limited impact on Warwickshire. The Council has no further comments to make and responded to Stage 2 Consultation.

Environment Agency

- 14.1.6. The Environment Agency has no objection to the proposed changes to the layout as defined in drawings 4049-06 (Revision 01) and 4049-07 (Revision 01) as the areas in question are not affected by the groundwater remediation infrastructure in place to the west of the Site. The Environment Agency welcomes the expansion of the green infrastructure network as a result of these changes.

Natural England

- 14.1.7. Natural England states that the additional land brought within the 'footprint' of the project within the proposed Calf Heath Community Park appears to offer potential benefits, for example in terms of habitat connectivity and recreation space. It comments that additional ecological survey of the land affected by these amendments may be needed in order to provide a comprehensive final draft of the Environmental Statement.

Penkridge Parish Council

- 14.1.8. Penkridge Parish Council refers to its earlier response to the Stage 2 Consultation and comments that it considers the proposals for Calf Heath Community Park are irrelevant.

Saredon Parish Council

- 14.1.9. Saredon Parish Council maintains its objection to the Proposed Development, irrespective of the proposed changes consulted upon during the Stage 2a Consultation.

Public responses

- 14.1.10. Three responses were received from the public, one of which was in direct response to the proposed changes consulted upon during the Stage 2a Consultation.
- 14.1.11. In relation to Calf Heath Community Park, a preference to keep the length of Straight Mile as countryside was stated.
- 14.1.12. The other responses were relevant to the Proposed Development consulted upon during the Stage 2 Consultation. One raised a general comment that the Proposed Development is too big for the area and surrounding villages. The other response raised similar points to feedback received from the same respondent during the Stage 2 Consultation. It asked for confirmation that an air quality review and assessment would be conducted to ascertain the likely human health impacts resulting from increases in vehicle movements along the A449 to the south of the Site. It also mentioned noise and vibration impacts to residents from Heavy Goods Vehicle (HGV) traffic on the A449 and proposed mitigation measures in specific locations.

14.2. Regard to responses

- 14.2.1. The table below provides Four Ashes Limited (FAL)'s regard to the responses received. These tables are limited to only those responses that relate to the Stage 2a Consultation.
- 14.2.2. The 'Change?' column in the table refers to whether or not the response led to change to the application.
- 14.2.3. It is important to note that as with any analysis of text-based feedback, there is likely to be a difference of opinion on how certain elements are interpreted or summarised. In addition, to avoid duplication cells have been combined where the regard to responses is the same.

Table 15: Summary of responses to Stage 2a Consultation and FAL's consideration

Topic: Changes to Order Limits north of A5		
Summary of responses	Regard to responses (section 49)	Change
Potential damage to hedgerows and trees because of the changes to the Order Limits.	The effects upon hedgerows and trees now within the revised Order Limits have been assessed in the Environmental Statement (Document 6.2).	N

Topic: Changes to Calf Heath Community Park		
Summary of responses	Regard to responses (section 49)	Change
Impacts of change need to be fully assessed in the Environmental Statement.	The impact of the changes has been fully assessed in the Environmental Statement (Document 6.2).	N
Ecological surveys of new land included in Order Limits may be needed.	Additional surveys were undertaken following the change in the Order Limits but not all additional areas included in the Stage 2a Order Limits were accessible. It must nevertheless be considered that the Applicant has a reasonable understanding of the ecological baseline of the entire Site.	N
Support for expansion of Community Park.	The support is welcomed.	N
Preference to keep the length of Straight Mile as countryside.	Built development will be kept to the north side of Straight Mile beyond the conserved roadside hedgerows and new mounding and woodland planting. To both sides of the road will be the Calf Heath Community Park which will include new and enhanced native planting and habitats. The visual effects	N

	upon users of Straight Mile are assessed within the Environmental Statement (Document 6.2) .	
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15. Ongoing engagement

15.1. Introduction

15.1.1. Following the completion of the Stage 2 Consultation and across Stage 2a Consultation, ongoing engagement with various bodies has continued on a regular basis, and is continuing with local authorities, Persons with an Interest in the Land (PILs) and prescribed consultees. This Chapter summarises this engagement.

15.2. Engagement with prescribed bodies and other (non-prescribed) consultees

Persons with an interest in the land

15.2.1. Four Ashes Limited (FAL) recognises that the Proposed Development will have an impact on a number of landholdings and properties in and around the Site. Particular attention has therefore been paid to keeping PILs and those immediately surrounding the Site informed of not only the development of the scheme, but also how it might affect their land and property. This ongoing engagement has been with land owners, statutory undertakers, management companies and local businesses.

15.2.2. The engagement has taken the form of direct correspondence, phone calls and an extensive programme of more than 50 face-to-face meetings.

15.2.3. The outcome of this engagement has meant that requests and issues raised by landowners have been incorporated into the Proposed Development as it progresses. The types of requests and issues addressed through this ongoing engagement process include:

- Securing voluntary agreements to provide offsite Bird Mitigation Land for the benefit of farmland birds for the duration of the construction (**Document 6.2, Technical Appendix 10.4**);
- Securing voluntary agreements wherever possible to purchase directly affected properties – minimising the need for compulsory acquisition and reducing hardship for landowners;
- Covering landowner costs for legal support through the voluntary agreement process;

- Unlocking complicated land rights issues through negotiation with a significant number of parties;
- Discussing noise issues with local home owners to help develop the proposed noise insulation strategy;
- Removing small parcels of land from the Order Limits where possible;
- Securing long-term leases for utilities that cross the Site wherever possible;
- Addressing concerns of statutory utilities providers;
- Accommodating where possible operational requirements of landowners within the Proposed Development particularly in relation to statutory utilities;
- Addressing timing issues and phasing queries and incorporating these requests into agreements;
- Considering highways queries for review by the design team.

15.2.4. Further details on the status of land negotiations is contained in the Statement of Reasons (**Document 4.1**).

National and regional development

15.2.5. FAL is committed to bringing forward the Proposed Development in a way which benefits the economy and prosperity of the region and its people. FAL has been engaging with economic development departments in local authorities as well as other regional economic and logistics related bodies to raise awareness of the opportunities presented by the Proposed Development and how these would fit into the wider economic development of the sub-region. Specific meetings that have helped progress the Proposed Development include:

- Meeting with economic development officers at South Staffordshire District Council, Staffordshire County Council and Wolverhampton City Council and local colleges such as Rodbaston Campus (part of South Staffordshire College) to help develop the Employment, Skills and Training Plan Framework;
- Promoting the West Midlands Interchange (WMI) as a key part of the Black Country LEP's development programme which led to it being presented at MIPIM 2018;
- Presentation to the Rail Freight Group Annual Conference to set out the rail offering of SRFIs and in particular WMI;

- Seminar participation and meetings with Transport for the West Midlands to discuss integration of freight schemes within the region and specifically WMI;
 - Presentation on WMI to the regional Transport Officers Group and CILT membership followed by questions and answers;
 - Presentation to the Staffordshire Chamber of Commerce Transport Group followed by questions and answers; and
 - Presentation to the Transport Officers Group for Marches LEP area followed by questions and answers.
- 15.2.6. Nationally, FAL recently submitted a response to the National Infrastructure Commission's Congestion, Capacity, Carbon: Priorities for National Infrastructure – Consultation, supporting the role that the intermodal rail plays within the freight sector. FAL had specific detailed comments in respect of the analysis of the existing freight sector included in the consultation. A submission was also made to the National Infrastructure Commission's Call for Evidence on their Freight Study commissioned by the Chancellor and a meeting was held with the National Infrastructure Commission. FAL will continue to play an active part in the national debate on the need for SRFI's because it believes they have a key role to play in a more sustainable future for freight in the UK.
- 15.2.7. This ongoing engagement is vitally important to ensure that the wider need and benefits of the WMI scheme are understood and realised at the earliest opportunity.

Local MPs

- 15.2.8. Through ongoing engagement and correspondence FAL has ensured that local MPs are kept informed of the Proposed Development progress through the pre-application consultation process.
- 15.2.9. Rt. Hon. Gavin Williamson MP: Ongoing correspondence has continued with the Rt. Hon Gavin Williamson MP in relation to the proposals and enquiries from local residents. FAL offered briefing meetings to Mr Williamson as part of the Stage 2 and Stage 2a Consultations. Neither opportunity was taken up. Correspondence forwarded by Mr Williamson from his constituents was also reviewed and included in this consultation report.
- 15.2.10. Jeremy Lefroy MP: A briefing meeting was held with Mr Lefroy as part of the Stage 2 Consultation. This provided the opportunity for FAL to outline the purpose of the consultation, and address

any questions about the Proposed Development. A similar briefing was offered as part of the Stage 2a Consultation. The opportunity was not taken up.

Local residents and businesses

- 15.2.11. FAL's project team has responded positively to requests to meet with local residents and businesses to discuss specific aspects of the Proposed Development. This includes from site adjacent residents concerned about mitigation proposed and those from further afield with a general interest in the Site. All issues raised in the meetings have been considered by FAL's project team in progressing the Proposed Development.
- 15.2.12. The 0800 number, email and freepost address have remained in operation for people to get in contact with FAL.

South Staffordshire District Council and Staffordshire County Council

- 15.2.13. FAL has continued to liaise with directly affected local authorities on the details of the scheme, keeping them up to date on progress towards submission. This includes meeting with officers to discuss issues such as detailed designs for the proposal, local impacts, the post submission and detailed design process, the Draft DCO including Requirements, a proposed Planning Performance Agreement, and the Draft Section 106 Agreement.
- 15.2.14. FAL also gave a presentation to members from both Councils on 4 December 2017. This provided an update on progress following Stage 2 Consultation and details of the Stage 2a Consultation which was then underway.

Other statutory bodies

- 15.2.15. FAL's Team have been in ongoing discussions with the Environment Agency, Natural England, Highways England, Network Rail, the Canal and River Trust and other statutory bodies to address the points raised in their respective responses to the Stage 2 Consultation. Meetings are ongoing to resolve outstanding technical issues.

15.3. Conclusion

- 15.3.1. FAL's commitment to ongoing engagement with a wide range of stakeholders has been instrumental in resolving issues and realising the benefits of the scheme.

16. Conclusions

16.1. Introduction

- 16.1.1. This Consultation Report outlines the consultation undertaken by Four Ashes Limited (FAL) prior to the submission of the Development Consent Order (DCO) application. FAL has consulted widely about the scheme. This consisted of both non-statutory and statutory phases of consultation.
- 16.1.2. Pre-application consultation is a legal requirement for Nationally Significant Infrastructure Projects (NSIPs). This Report sets out FAL's compliance with the statutory requirements of the Planning Act 2008 with regard to pre-application consultation.
- 16.1.3. The pre-application consultation process took place over three phases:
- Stage 1 Consultation (non-statutory) ran from 13 June to 30 July 2016. This gave consultees an early opportunity to comment on emerging proposals for the scheme.
 - Stage 2 Consultation (statutory) ran from 5 July to 30 August 2017. This provided more details on the proposals, including preliminary environmental information.
 - Stage 2a Consultation (focused consultation) took place from 23 November 2017 to 2 January 2018. This provided the opportunity for feedback on two small changes to the order limits.
- 16.1.4. In addition to these stages of consultation, FAL has undertaken informal engagement throughout the development of the scheme and has encouraged and also agreed to meet with any parties that have requested meetings.

16.2. How feedback has influenced the proposals

- 16.2.1. This report summarises all relevant comments received during statutory and non-statutory consultations and FAL's responses to them.

Stage 1 Consultation

- 16.2.2. A number of changes to the Project were made in response to comments made at Stage 1 Consultation. These include:
- 1) In response to feedback on the two different Masterplan Options (East and West), the West option was chosen as the appropriate Masterplan Option for the Proposed Development.

- 2) With the benefit of Stage 1 Feedback, FAL refined the Parameters Plans, with alterations including:
 - i. Part of the internal link road and the adjoining A5 roundabout were relocated 30m to the east to reduce impact on the setting of the Canal Conservation Area and the two listed buildings, as a result of expert heritage advice and engagement with Historic England;
 - ii. A 20m landscape buffer was introduced along the western boundary of Zone A4, to enhance ecological connectivity through the Site;
 - iii. The rail terminal layout was refined to allow the rail terminal to accept 'full-length' 775m trains without splitting. This required the reconfiguration of Gravelly Way and the introduction of a new road bridge;
 - iv. The rail terminal footprint was reconfigured and reduced and moved further away from Station Drive, allowing for additional landscape screening to the A449 and to minimise the impact of the terminal on residents of Station Drive;
 - v. Additional mitigation land was brought into the Proposed Development, allowing for further mounding and landscaping, so as to reduce the impact of the terminal on the residents of Station Drive;
 - vi. Additional land was brought into the Proposed Development to create a community park to the south;
 - vii. The layout of the buildings to the south of Vicarage Road was altered to retain existing veteran trees, hedgerows and ponds, and to reduce the impact of the terminal on Calf Heath village through detailed landscaping changes and by requiring (through the s106 agreement/requirements) that the buildings to be single sided units, and
 - viii. The amount of green space across the scheme was increased, with ecological and pedestrian connectivity within the Site enhanced.
- 3) The decision was taken to allow the new road through the Site from the A5 to the A449 to be adopted and made publically accessible, and to make this the principal route between the two trunk roads and the M6.
- 4) A series of traffic mitigation measures were also brought forward:

- i. A Sustainable Transport Strategy - sets out a range of measures to deliver improved pedestrian and cycle access, including new infrastructure, and addressing existing issues with crossings, footways and cycleways, as well as improvements to the Canal towpath;
 - ii. A Site Wide Framework Travel Plan – outlines possible increased provision of buses, which could include a mix of additional public services and dedicated WMI buses;
 - iii. An HGV Management Plan – sets out how the movement of HGVs will be managed on and off the Site, including details of restricted routes and measures to enforce these restrictions;
 - iv. Banning the right turn from the A449 into Station Drive. Vehicles requiring direct access to Station Drive travelling north will need to utilise the new A449 roundabout to turn around, further north at the junction with Gravelly Way. This reduces the total number of vehicles using Station Drive and Station Road as it would make it a less desirable route for potential rat-running;
 - v. Providing a turning area on the west side of the low railway bridge on Station Drive. This means that HGVs which do inadvertently turn into Station Drive can turn around without blocking the road or undertaking a dangerous movement, such as reversing back to the A449, as currently happens, and resulting in bridge strikes; and
 - vi. Making Crateford Lane one way eastbound. This means that egress is maintained for local residents, whilst reducing existing rat running.
- 5) In response to concerns about the visual impact of the Proposed Development, the following changes were made:
- i. A reduction in the height parameters of the buildings to a maximum of 30m to the ridge. The proposal at Stage 1 was a maximum of 36m;
 - ii. A restriction on the highest buildings (up to 30m) to a central part of the development zones where they are least visible from Shoal Hill Area of Outstanding Natural Beauty (AONB);
 - iii. The development of a Landscape and Green Infrastructure Illustrative Plan to soften the impacts of the buildings on the surrounding areas; and

- iv. As identified previously, the new adopted link road from the A5 was moved 30m to the east to reduce any impact on the setting of the conservation area. As a result, it has allowed for the introduction of an additional landscape buffer.
- 6) In response to comments from residents in Penkridge, the Consultation Zone for the project was extended for the Stage 2 Consultation to incorporate all properties in Penkridge.

Stage 2 Consultation

16.2.3. A number of changes to the Project were made in response to comments made at Stage 2 Consultation. These include:

- 1) Increasing the size of Calf Heath Community Park to increase the amount of publicly accessible green space, and to create a more cohesive environment linking with the canalside and the rest of the Site;
- 2) Including additional substantial landscape areas and 'buffers' as part of the scheme to mitigate the visual impact of the scheme;
- 3) Provision of a Canal Enhancement Scheme to include:
 - i. Works to improve the towpath by resurfacing it with a suitable surface (i.e bound/compacted gravel such as Breedon gravel type);
 - ii. The creation of two new pedestrian connections to the towpath from Croft Lane Community Park;
 - iii. Improvements to the existing pedestrian access points at the A5, Hoppe Roundabout and Station Road; and
 - iv. The introduction of interpretation boards and signage.
- 4) Altering ecological corridors across the Site to minimise the effects on protected species, including significantly increasing the size of the area between Zones A4 and A5 on the Development Zone Parameter Plan (**Document 2.5**) to 100m, and incorporating additional dark wildlife corridors throughout the Site to minimise and mitigate against the potential impacts of light on wildlife;
- 5) Including additional dark wildlife corridors throughout the Site to minimise and mitigate against the potential impacts of light on wildlife - for example, the area between Zones A4 and A5 on the **Development Zone Parameter Plan (Document 2.5)** have been widened to 100m;

- 6) Securing voluntary agreements to provide offsite Bird Mitigation Land for the benefit of farmland birds for the duration of the construction (**Document 6.2, Technical Appendix 10.4**);
- 7) Providing further detail regarding ecological enhancement and mitigation in the Environmental Statement following requests from statutory consultees and the public;
- 8) Proposing that a Contingent Traffic Management Fund be available to be spent on implementing local traffic measures, if they are considered necessary by Staffordshire County Council;
- 9) A commitment to join the Regional Networks Resilience Partnership, should the Proposed Development be consented;
- 10) A commitment to contact Transport for West Midlands following the submission of the Application to invite it to participate in the development of the Sustainable Transport Strategy, Site Wide Framework Travel Plan, and Heavy Goods Vehicle (HGV) Management Plan;
- 11) Changing the design for the new bridge crossing over the Canal to reflect the guidance published by the Canal and River Trust, and the proposed materials to respond directly to comments raised by Canal and Rivers Trust;
- 12) Undertaking a desk-based study on the potential impact of the Proposed Development on sailing quality at Calf Heath Reservoir, in response to concerns from Greensforge Sailing Club. FAL has also committed to conducting a wind tunnel test to measure the changes in wind speed, direction and turbulence around Calf Heath Reservoir at the appropriate stage of detailed design to establish the potential impact of the Proposed Development on sailing quality at the Reservoir;
- 13) Incorporating access for equipment to the Calf Heath Reservoir dam into the designs;
- 14) Committing to establishing a liaison committee, involving local representatives and dealing with a number of aspects of the Site; and
- 15) Minor changes to the Order Limits to avoid unnecessary parcels of land a part of the Canal.

Stage 2a Consultation

- 16.2.4. No changes were made as a result of feedback from the Stage 2a Consultation.

17. Glossary

APFP Regulation	Applications: Prescribed Forms and Procedures Regulations 2009
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ASA	Alternative Sites Assessment
CA	Conservation Area
CAA	Civil Aviation Authority
CRT	Canal and River Trust
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESP	ES Pipelines
FAL	Four Ashes Limited
FEMMP	Framework Ecological Mitigation and Management Plan
FHGVMP	Framework HGV Management Plan
GI	Green Infrastructure
GRIP	Governance for Rail Investment Projects
Grosvenor	The Grosvenor Group
GVA	Gross Value Added
HE	Highways England
HGV	Heavy Goods Vehicle
HRA NSER	Habitat Regulations Assessment No Significant Effects Report
HS2	High Speed Two
HSC	Hazardous Substance Consent
HSE	Health and Safety Executive
i54	i54 South Staffordshire
JLR	Jaguar Land Rover
Kilbride	Kilbride Holdings
LCP	Landscape Character Parcels
LCT	Landscape Character Types
LEP	Local Enterprise Partnership
LGV	Large Goods Vehicle
MOD DIO	Ministry of Defence's Defence Infrastructure Organisation
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project

PINS	The Planning Inspectorate
PIL	Persons with an Interest in the Land
The Proposed Development	An intermodal freight terminal with direct connections to the West Coast Main Line, capable of accommodating up to 10 trains per day and trains of up to 775m long, including container storage, Heavy Goods Vehicle ('HGV') parking, rail control building and staff facilities; Up to 743,200 square metres (gross internal area) of rail-served warehousing and ancillary service buildings; New road infrastructure and works to the existing road infrastructure; Demolition and alterations to existing structures and earthworks to create development plots and landscape zones; Reconfiguring and burying of electricity pylons and cables; and Strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas and publicly accessible open areas.
RLS	Regional Logistics Site
ROF	Royal Ordnance Factory
SAC	Special Area of Conservation
SAD	Site Allocations Document
SCC	Staffordshire County Council
Site Boundary	The SRFI would broadly be bounded by the A5 trunk road to the north (from Junction 12 to the Gailey Roundabout); Calf Heath reservoir, the M6, Stable Lane and Woodlands Lane to the east; Station Drive, Vicarage Road and Straight Mile to the south; and the A449 trunk road (Stafford Road), from the Gailey Roundabout to Station Drive to the west. The south-eastern area of the Site is also bisected by Vicarage Road.
SME	Small to Medium-sized Businesses
SoCC	Statement of Community Consultation
SRFI	Strategic Rail Freight Interchange
SRN	Strategic Road Network
SSDC	South Staffordshire District Council
SSSI	Site of Special Scientific Interest
TfWM	Transport for West Midlands
The Act	The Planning Act 2008
The NPS	The National Policy Statement for National Networks
The Scheme	West Midlands Interchange (WMI)