Document 7.2

Alternative Sites Assessment

The West Midlands Rail Freight Interchange Order 201X

Regulation 5 (2) (q)

Quod - June 2018

West Midlands Interchange

Four Ashes Ltd

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Contents

1. Introduction

1.1.1 Four Ashes Ltd is seeking Development Consent for a Strategic Rail Freight Interchange (SRFI), referred to as West Midlands Interchange (WMI) at Four Ashes in South Staffordshire.

1.1.2 The Alternative Sites Assessment (ASA) assesses the alternative sites that have been considered in selecting the proposed WMI site to which the application for Development Consent relates. The purpose of this document is to consider whether the site proposed for the WMI development is the most suitable, or whether alternative sites which could meet the need for a SRFI ought to be preferred. This ASA established the area in which it is appropriate to search for an alternative site, sets out the search criteria to assess potential sites and assesses the suitability of alternative sites.

1.1.3 A SRFI is a large rail served distribution park linked into both the rail and strategic road systems. A SRFI needs to be capable of accommodating the large warehouses necessary for the storage, processing and movement of goods for manufacturers, retailers and end consumers. The aim of a SRFI is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution journey by road. This is achieved through co-location of other distribution and freight activities and by adopting locations close to centres of demand. Thus, a SRFI has specific locational requirements.

1.1.4 National policy for SRFIs is set out in the National Networks National Policy Statement (the NPS). The NPS was designated by Parliament in December 2014 and provides a strong and supportive framework for SRFI proposals. The NPS sets out the Government's vision for the transport system as a driver of economic growth and social development, and it attaches particular importance to the use of rail for the transport of freight across the country, in order to help meet environmental goals and improve quality of life. The NPS establishes the need for an expanded network of large SRFIs across the regions (paragraphs 2.50 and 2.54).

1.1.5 The proposed site of WMI lies within Green Belt land and there is, therefore, a requirement to demonstrate that very special circumstances exist to justify inappropriate development. Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly and

demonstrably outweighed by other considerations. However, the NPS recognises that, due to 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).

1.1.6 This ASA considers sites which are within and outside Green Belt land and seeks to determine if there are any sites which represent a more suitable location for a SRFI development.

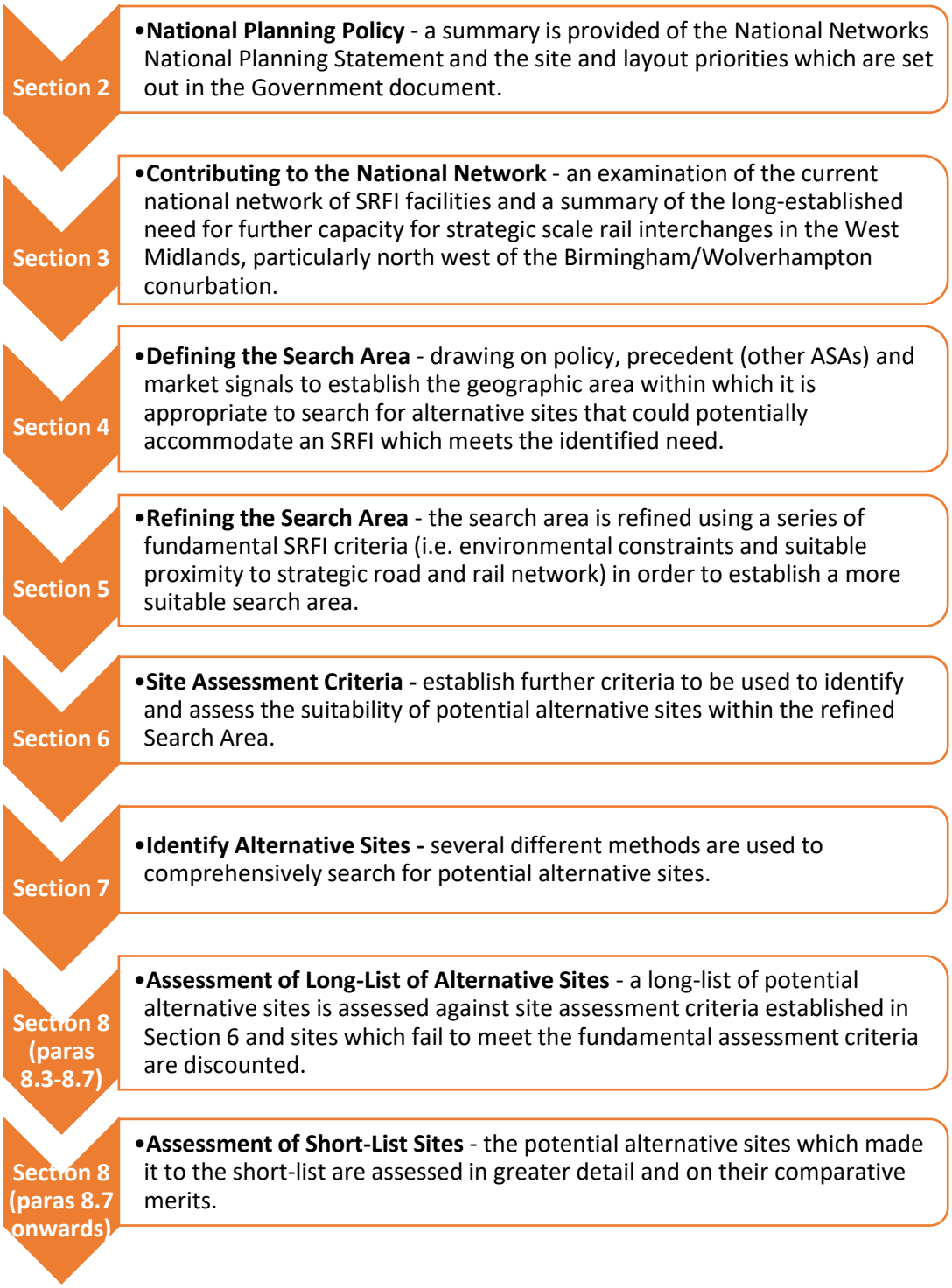
1.1.7 It is not, however, the purpose of this ASA to seek to justify the detailed suitability of the proposed development in its own right. The suitability of the proposed site from a planning and environmental perspective is assessed in detail within the **Planning Statement** [Document 7.1A], **Environmental Statement** [Document 6.2] and **Design and Access Statement** [Document 7.5]. Further information on the alternative layouts of the proposed SRFI is provided within the Environmental Statement (in accordance to the EIA Directive). In addition, further information on the design evolution and alternative iterations of the proposed development will be provided in the Design and Access Statement.

1.1.8 A draft ASA was made available as part of the Stage 2 Consultation (5 July 2017 to Wednesday 30 August 2017). The feedback from Stage 2 was analysed by the project team with a number of alternative sites suggested by the public. In addition to State 2 Consultation, focus discussions were held with Planning Officers at Cannock Chase District Council, Wolverhampton City Council, Stafford Borough Council, South Staffordshire Borough Council and Staffordshire County Council to seek to agree the methodology and results of the ASA.

1.1.9 None of the Planning Officers raised in-principle objections to the methodology of the ASA and no additional genuine alternative sites were identified by the Officers who are very familiar with the local areas and opportunities.

1.1.10 There is no formally prescribed process or methodology for undertaking an ASA, and the process should be adapted to the characteristics of different projects. The method used in this assessment reflects the planning policy requirements set out in the following section and the specific operational and locational needs of a SRFI.

1.1.11 For the WMI project, this ASA broadly follows these key steps:


Section 2
•National Planning Policy - a summary is provided of the National Networks National Planning Statement and the site and layout priorities which are set out in the Government document.
Section 3
•Contributing to the National Network - an examination of the current national network of SRFI facilities and a summary of the long-established need for further capacity for strategic scale rail interchanges in the West Midlands, particularly north west of the Birmingham/Wolverhampton conurbation.
Section 4
•Defining the Search Area - drawing on policy, precedent (other ASAs) and market signals to establish the geographic area within which it is appropriate to search for alternative sites that could potentially accommodate an SRFI which meets the identified need.
Section 5
•Refining the Search Area - the search area is refined using a series of fundamental SRFI criteria (i.e. environmental constraints and suitable proximity to strategic road and rail network) in order to establish a more suitable search area.
Section 6
•Site Assessment Criteria - establish further criteria to be used to identify and assess the suitability of potential alternative sites within the refined Search Area.
Section 7
•Identify Alternative Sites - several different methods are used to comprehensively search for potential alternative sites.
Section 8 (paras 8.3-8.7)
•Assessment of Long-List of Alternative Sites - a long-list of potential alternative sites is assessed against site assessment criteria established in Section 6 and sites which fail to meet the fundamental assessment criteria are discounted.
Section 8 (paras 8.7 onwards)
•Assessment of Short-List Sites - the potential alternative sites which made it to the short-list are assessed in greater detail and on their comparative merits.

2. National Planning Policy

2.1.1 A detailed summary and analysis of the planning policy framework is set out in the **Planning Statement** [Document 7.1A]. The purpose of this section is to summarise the locational requirements and recommendations found in the NPS. These requirements and recommendations will form the basis for the alternative site search methodology and the analysis of an alternative site's potential suitability.

2.1.2 The Planning Act 2008 as amended ('the Act') sets out the planning process for projects classified as Nationally Significant Infrastructure Projects (NSIPs). In view of their national importance, the NSIP classification covers developments such as energy generating stations of a certain size, new highways, new gas and overhead electric lines, as well as a range of other nationally important infrastructure projects, including strategic rail freight interchanges (SRFI).

2.1.3 To be considered a NSIP a SRFI must be over 60 hectares in size and have the capacity to handle four or more goods trains a day[1]. The WMI proposal would be approximately 297 hectares (including proposed landscaping) with the capacity to handle 10 goods trains per day and is, therefore, classified as an NSIP.

2.1.4 All NSIPs must be determined in accordance with the decision-making framework set out in the Act and the primary policy considerations set out in the relevant National Policy Statements. As stated in the previous section, in this case, the NPS sets out the need for, and Government's policies to deliver, development of NSIPs on the national road and rail networks in England, including SRFIs.

2.1.5 The NPS sets out the following guidance on the appropriate location of SRFIs. This guidance forms the basis of this ASA:

> ***"Given the strategic nature of large rail freight interchanges it is important that new SRFIs or proposed extensions to RFIs upgrading them to SRFIs, are appropriately located relative to the markets they will serve, which will focus largely on major urban centres, or groups of centres, and key supply chain routes. Because the vast majority of freight in the UK is moved by road, proposed new rail freight interchanges should have good road***

[1] The Planning Act 2008, Part 3, Clause 26

> ***access as this will allow rail to effectively compete with, and work alongside, road freight to achieve a modal shift to rail."*** (paragraph 4.84)

2.1.6 Adequate links to the rail network are essential. As a minimum, the NPS provides that SRFIs should be located on a route which can accommodate larger freight wagons (known as 'loading gauge[2] W8' or more) and are capable of handling four trains per day, where possible with capacity for that number to increase over time (paragraphs 4.85 and 4.89).

2.1.7 In addition, SRFIs involve large structures, buildings and the operation of heavy machinery, which can require continuous working arrangements. In terms of appropriate locations, the NPS therefore acknowledges that SRFIs often may not be suitable adjacent to residential areas (paragraph 4.86).

2.1.8 Environmentally sensitive locations such as National Parks or Areas of Outstanding Natural Beauty are also not considered to be suitable locations and the NPS states that development consent in these areas should be refused except in exceptional circumstances and where it can be demonstrated that it is in the public interest (paragraphs 5.150-152).

2.1.9 Because of these characteristics, and the forecast growth in rail freight, the NPS confirms that the number of suitable locations for SRFIs will be limited (paragraph 2.56) and that:

> ***"Due to their requirements, it may be that countryside locations are required for SRFIs"*** (paragraph 4.84)

2.1.10 With regard to Green Belt locations, the NPS advises that Green Belts are situated around certain cities and major urban areas (paragraph 5.164) (i.e. the markets and conurbations that SRFIs intend to serve) and that:

> ***"Promoters of SRFIs may find that the only viable sites for meeting the need for regional SRFIs are on Green Belt land"*** (paragraph 5.172)

[2] The 'loading gauge' is a measure of the height and width of rolling stock and freight wagons which defines the size of vehicles and loads which can be carried on a specific rail route.

2.1.11 Whilst it is clearly necessary, therefore, to recognise that SRFIs are inappropriate development in the Green Belt and that very special circumstances for their development needs to be demonstrated, the NPS acknowledges that the Green Belt land located close to conurbations may provide the only viable sites if the compelling need for a national network of appropriately located SRFIs is to be achieved.

2.1.12 It is apparent from the NPS that the desired national network should consist of SRFIs of an appropriate and strategic scale. In particular, Table 4 of the NPS is clear that:

- reliance on existing rail freight interchanges to manage demand is "simply not a viable option" because it fails to respond to the challenges of increased freight movement and increased road congestion – imposing unacceptable costs and delays; and

- reliance on a larger number of smaller rail freight interchanges would not meet the increasing performance and efficiency required of our logistics system.

2.1.13 From its analysis, the NPS concludes that SRFI capacity needs to be provided at a 'wide range of locations' (paragraph 2.58) and that:

> ***"The Government has concluded that there is a compelling need for an expanded network of SRFIs. It is important that SRFIs are located near the business markets they will serve – major urban centres, or groups of centres – and are linked to key supply chain routes. Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites."*** (paragraph 2.56)

2.1.14 The following section will build on the requirements and recommendations set out in the NPS and consider the current national network of SRFI facilities, particularly for the West Midlands.

3. Contributing to the National Network

3.1 The Need for a National Network

3.1.1 As stated in the previous section, the shift of freight from road and aviation to rail is strongly encouraged to help reduce transport's carbon emissions and provide economic benefits (NPS paragraph 2.40). The NPS establishes that there is a "compelling need" for "an expanded network of SRFIs" throughout the country and that "SRFI capacity needs to be provided at a wide range of locations, to provide the flexibility needed to match the changing demands of the market" (paragraph 2.58).

3.1.2 Given the compelling need to expand the network of SRFIs which is set out in the NPS, it is appropriate to examine the scope and suitability of the current national network of SRFIs and understand how the current network operates. **Figure 1** below shows the current network of operational, consented and planned SRFIs across the country.

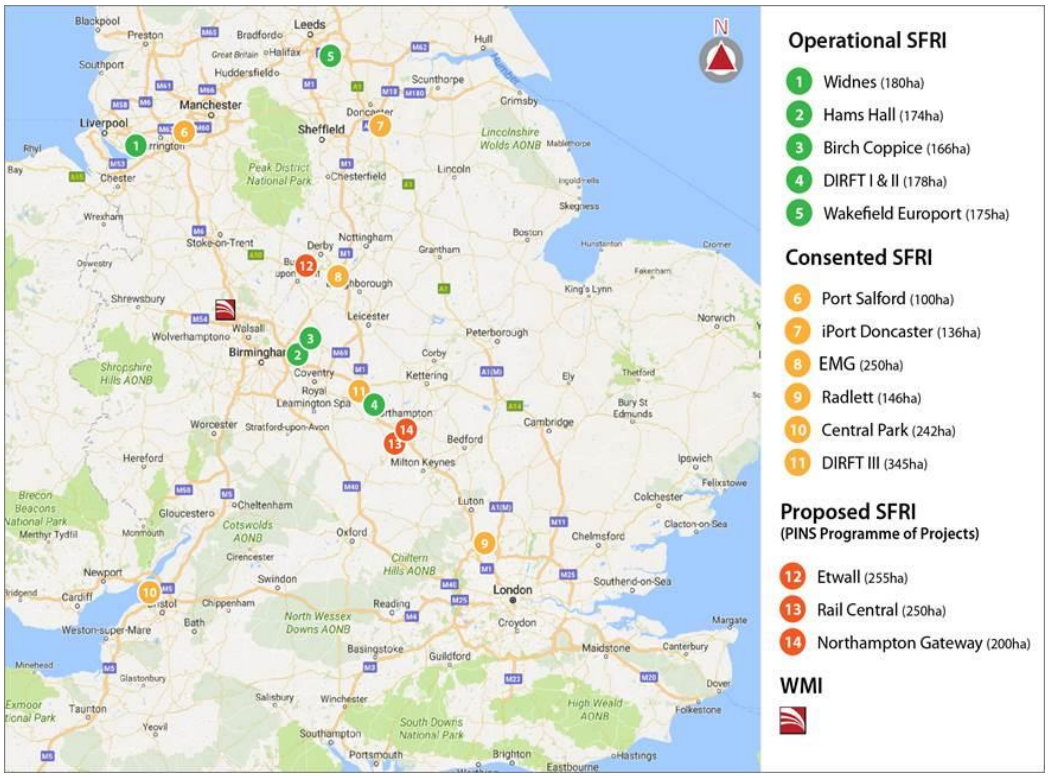


Figure 1 Strategic Rail Freight Interchange Network

3.1.3 Several important observations are apparent from an examination of the network of current and anticipated SRFIs. First, whilst small parts of the country are served by existing SRFIs, the NPS clearly states that relying on the existing rail freight interchanges to manage demand is neither a viable nor desirable option:

> ***"Perpetuating the status quo, by design or default, is simply not a viable option. Road congestion would continue to increase and the deep-sea ports would face increasing difficulties in ensuring the efficient inland movement of the forecast growth in the volume of sea freight trade, causing port congestion and unacceptable costs and delays for shippers. This would constitute a constraint on economic growth, private sector investment and job creation."*** (Table 4, Page 21/22)

3.1.4 Newer SRFI facilities are emerging to infill gaps in the network and clusters of facilities are beginning to form.

3.1.5 Examples of SRFI facilities emerging to "infill" gaps include:

- Radlett serving London and the South East from the north west quadrant of the M25;
- Port Salford, serving the Manchester side of the North West, between Widnes to the west and Wakefield Europort to the east;
- iPort Doncaster, serving the eastern half of Yorkshire & Humberside alongside Wakefield Europort to the west;
- East Midlands Gateway (EMG), to serve the area north of DIRFT and south of iPort / Wakefield;
- Etwall, serving the area between East Midlands Gateway and Widnes; and
- Rail Central and/or Northampton Gateway, serving the area between DIRFT and Radlett.

3.1.6 The clustering of facilities generally reflects the scale of demand for SRFI developments in specific locations and also reflects their success. Within the West and East Midlands area, existing or proposed SRFI provision is defined by a

network of three principal clusters comprising (1) Hams Hall/Birch Coppice, (2) East Midlands Gateway and, the consented but not yet implemented, RFI at Castle Donnington and (3) DIRFT I, II and III, with that cluster proposed to be reinforced with emerging SRFI proposals near Northampton (i.e. Rail Central and Northampton Gateway).

3.1.7 However, even when the consented and proposed SRFIs are considered, it is apparent that substantial gaps in the network remain. One of the most striking of these is the gap of approximately 120km between Birch Coppice/Hams Hall and the SRFIs at Widnes and Port Salford. Consistent with the NPS, appropriate locations for SRFI are those with high quality strategic locations but also proximity to major markets and, in this context, the lack of provision in the west and north West Midlands, all the way through the Staffordshire corridor to the north west is particularly obvious.

3.2 A Gap in the Network

3.2.1 As set out in detail within the **Planning Statement** [Document 7.1A], the lack of rail served warehouse facilities to serve the West Midlands has long been identified by policy makers and the national policy objective for a network of SRFIs will not be satisfied until the outstanding need is addressed.

3.2.2 As the NPS advises: “it is important that SRFIs are located near the business markets they serve – major urban centres or groups of centres – and are linked to key supply chain routes” (paragraph 2.56). It would therefore be contrary to national policy and also impractical for the West Midlands to rely on remote facilities in the East Midlands to meet its rail freight requirements. To do so would contradict one of the principal purposes of national policy: “to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road” (paragraph 2.44). New facilities should be appropriately located within poorly served areas on strategic sites to give effect to government policy.

3.2.3 The need for a national network and the inadequacy of relying on existing or remote facilities is supported by survey data made available as part of the case in support of the application for the expansion of DIRFT (DIRFT III Need Report, page 63, October 2012).

3.2.4 The survey illustrates the role that DIRFT plays in serving the cluster of large scale warehousing in Northamptonshire and Leicestershire. The pie chart below shows

the destination of outbound lorry movements to their first destination from the rail terminal.

3.2.5 It shows 27% of intermodal traffic from the terminal staying on site (i.e. going to warehousing within DIRFT itself – a statistic which underlines the benefit of large scale SRFI with substantial on-site warehousing able to gain the maximum benefit from the rail interchange), a further 16% bound for nearby Magna Park, 11% to Northamptonshire and 4% to the remainder of the East Midlands. Beyond these destinations, a secondary catchment encompasses a wider area, with only 7% for instance travelling to any destination in the West Midlands, despite the scale of the market opportunity.

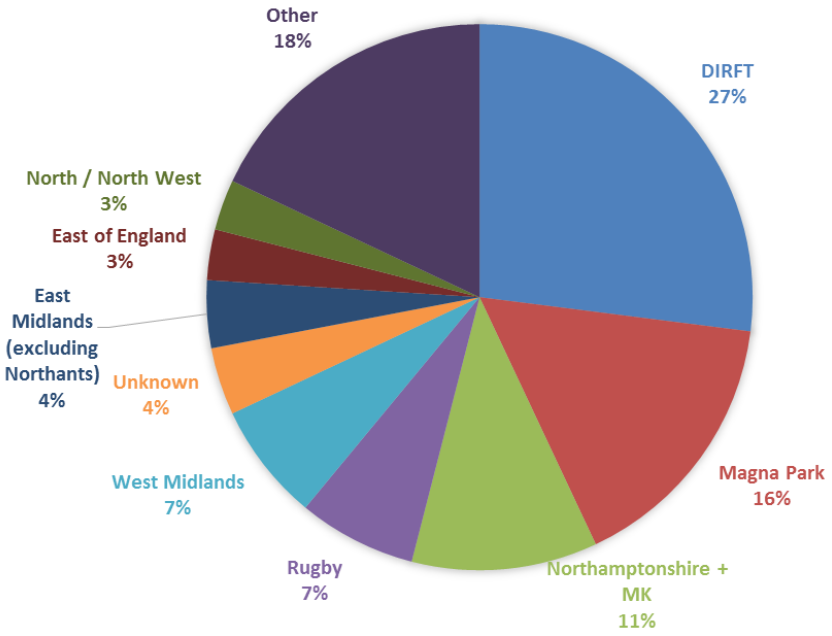


Figure 2 Summary of destinations of lorries leaving DIRFT.

3.2.6 The same source information identifies that 65% of rail-related HGV trips from the rail terminal at DIRFT travelled 10-miles or less to their first destination.

3.2.7 DIRFT primarily acts as a Regional and National Distribution Centre and, as such, goods will travel beyond the 10-mile catchment area on the secondary leg of the journey (for example, from the Tesco warehouse within DIRFT to Tesco supermarkets across the country), however, this only reinforces the need for a network of SRFIs to serve major conurbations and demonstrates the need for SRFI's to be located to maximise rail trunk haul and minimise the secondary distribution leg by road, in accordance with paragraph 2.44 of the NPS. Serving

the West Midlands from a SRFI in the East Midlands would not meet the policy expectations of the NPS and does not allow rail to be used to best effect.

3.2.8 Furthermore, the 120km gap that has been identified is located between Birch Coppice/Hams Hall and the SRFIs at Widnes and Port Salford. It is, therefore, relevant to note the current capacity of Birch Coppice and Hams Hall, the two SRFI facilities which already serve a portion of the Wolverhampton/Birmingham conurbation. A recent study found that both facilities had limited available undeveloped land, with less than 40ha between both sites[3]. The study also noted that concerns had previously been raised within the Regional Planning Guidance about over development in this part of the region and the Study's consultations revealed strong Officer and Member resistance to any further allocation at Birch Coppice, centring on the feeling that the borough already provides for more than its "fair share" of B8 land and that other regeneration initiatives now have to take priority. North Warwickshire (the local authority for Birch Coppice and Hams Hall) therefore did not support any further expansion of rail freight facilities.

3.2.9 The **Market Assessment** [Document 7.4] provides an assessment of the existing SRFI facilities and found that there is no land remaining at Birch Coppice and the last two speculatively constructed units have recently been sold. The last remaining part of the former Hams Hall Power Station is currently being marketed as Prologis Park, Hams Hall and there is likely to be strong demand from occupiers.

3.2.10 On this basis, it is clear that the gap in the network cannot be addressed by relying of existing facilities or the expansion of existing facilities.

3.2.11 The need for a network of facilities is clear, therefore, for at least the following reasons:

- only a true network with modern SRFIs provided close to the UK's major markets would meet national policy expectations and enable the efficient movement of freight within the UK by rail to be achieved;
- areas remote from SRFI are not significantly served by them; and
- each SRFI has a relatively local rail related catchment area – emphasising the policy requirement for SRFIs to be located close to markets and the

[3] West Midlands Strategic Employment Sites Study, PBA / JLL (September 2015)

expectation that new infill SRFIs will largely achieve business which is new to rail (NPS paragraph 4.84), rather than simply diverting rail-based freight from elsewhere.

3.2.12 It also follows from this background that the extensive gap in the network between Birch Coppice/Hams Hall and Widnes/Port Salford will not be closed by the provision of a single SRFI. Lessons learned from the spacing of SRFI in the East Midlands and elsewhere suggests the need for at least two SRFIs or clusters of SRFIs in the M6 corridor, as illustrated in the **Figure 3** below.

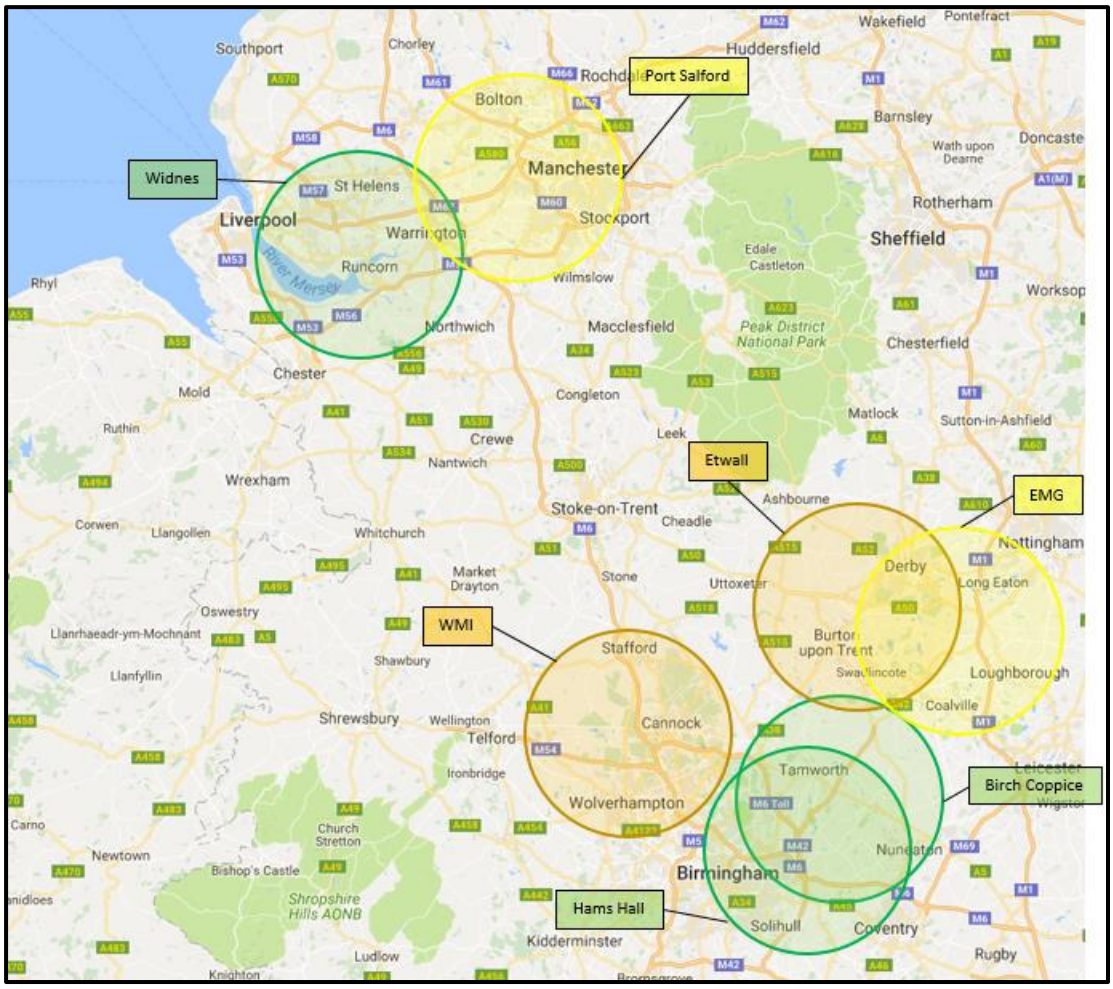


Figure 3 Illustrative Areas (10 miles) of Regional SRFI Network

3.2.13 The areas shown in **Figure 3** indicate a 10-mile radius around the existing and proposed SRFI facilities in the vicinity of WMI. As stated above, 10 miles is the distance that the majority of rail-related HGV trips from DIRFT travelled to their first destination and this radius is intended to demonstrate an illustrative catchment area for the existing and proposed rail freight facilities. However, it must be noted

that each SRFI facility preforms its own unique function, directed by their individual occupier's requirements, and therefore, this is not intended to demonstrate the fixed or precise catchment area for each facility.

3.3 Confirmation of a Recognised Need

3.3.1 A review of the local and regional policy set out in the **Planning Statement** demonstrates that the importance of providing capacity for strategic scale rail interchanges to serve the West Midlands, particularly to the north west of the Birmingham/Wolverhampton conurbation, has been long understood. However, notwithstanding the urgency of the identified need, no policy progress has been made to secure the development of rail served sites and the scale of the identified shortfall remains outstanding. As demonstrated by the map of the national network (at **Figure 1**), there are no new or planned SRFIs in the West Midlands, apart from WMI.

3.3.2 Since 2004, successive policy documents have demonstrated a need for strategic scale rail interchange facilities in the West Midlands. Furthermore, the "Black Country and southern Staffordshire" has consistently been identified as one of the best locations for a development of the scale and function of WMI. However, given the scale of required development, the Development Plan process has established that a site of an appropriate size cannot be found in the Black Country.

3.3.3 The most recent research in policy documents and undertaken by the WMI Team, demonstrates that this is a critical shortage of land and the need for further large scale logistic sites within the West Midlands remains and, particularly, within southern Staffordshire and the Black Country.

3.3.4 The **Market Assessment** [Document 7.4] examined the demand for storage and distribution floorspace within a defined market area and the supply of land which might compete within the same area.

3.3.5 The **Market Assessment** establishes a market area for WMI which included those locations which potentially would compete with the proposals at WMI (i.e. locations which an occupier might consider alongside WMI when looking for new floorspace). In commercial terms, occupiers in the B8/logistics sector can be 'footloose' to a certain extent. However, they are driven by cost efficiency based on their supply chain dynamics. Whilst this ASA considers the most appropriate location for a SRFI using infrastructure contains, land availability and policy considerations, the **Market Assessment** considers the supply and demand for warehousing in a

market where occupiers are accustomed to having to consider sub-optimal locations due to the traditional shortage of achievable supply.

3.3.6 Therefore, in order to ensure a comprehensive approach, the market area assessment included the following areas:

- the Stoke and Staffordshire Local Enterprise Partnership (LEP) area;
- the Black Country LEP area; and
- the Greater Birmingham & Solihull LEP area.

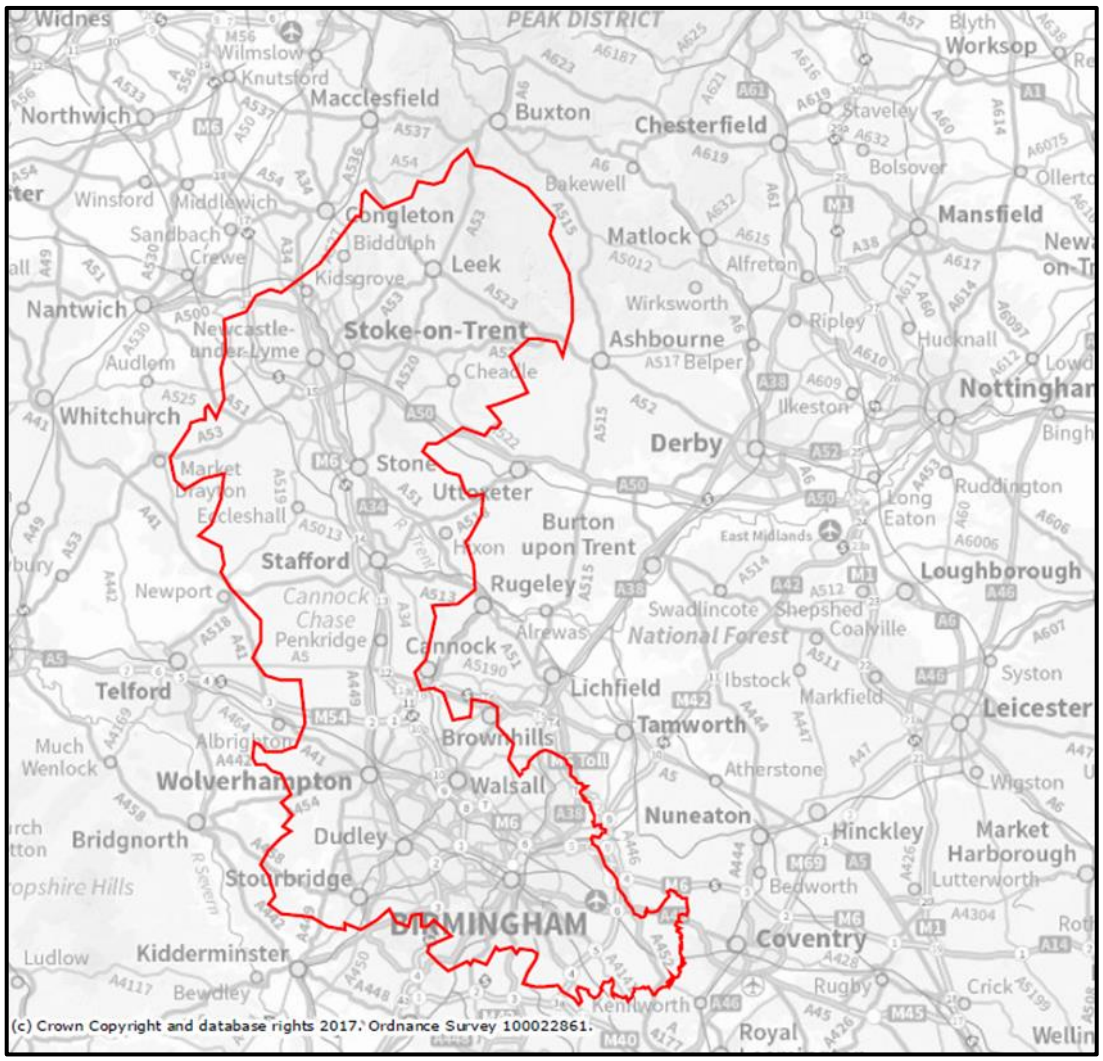


Figure 4 Market Assessment's market area. Stoke-on-Trent and Staffordshire LEP, the Black Country LEP and the Greater Birmingham and Solihull LEP boundaries.

3.3.7 The **Market Assessment** finds that:

- Trends in the retail industry (particularly the increase in e-commerce) have driven wholesale changes to the logistics sector and led to a significant increase in demand for floorspace. The requirements of the sector make the West Midlands an ideal location for distribution floorspace due to the region's central location and densely populated areas within close proximity;

- There is a critical undersupply of B8 floorspace. The majority of supply, both regionally and nationally, is of lower quality and relatively small in size with a severe shortage of the higher quality, large scale strategic sites and larger units;

- As at November 2017, there is less than 1.2 years of supply of suitable B8 floorspace in the WMI market area. The shortage is particularly evident in the Black Country where there is only 0.2 year's supply (one second-hand unit).

- The supply of high quality sites within the WMI market area and capable of accommodating large, modern requirements is very limited. There are currently no unconstrained strategic sites available; the majority of sites are only able to accommodate smaller units and there are no rail served sites currently available or in the pipeline.

3.3.8 The **Market Assessment** concludes that the WMI proposals would meet an identified need for a SRFI and also meet a clear need for high quality, well-located sites, capable of accommodating large occupier requirements and enabling the use of rail. It is essential to provide suitable sites and premises to support the logistics sector, which plays a vital role in the UK economy.

3.3.9 Finally, as explained in the **Rail Operations Report** [Document 7.3], Network Rail maintains an investment programme (in parallel with developments such as HS1, HS2 and HS3) which focuses on seeking to respond to forecast growth in passenger and freight traffic through capacity enhancement.

3.3.10 Network Rail has developed long-range forecasts of passenger and freight demand out to 2043, which form the basis for a separate route study being undertaken by Network Rail to consider options for further enhancement of network capacity, alongside the proposed HS2 development. The forecasting process undertaken by Network Rail, as endorsed by the NPS (paragraph 2.49), assumes the

development of a SRFI at “Four Ashes/F’stone”[4], as part of the network that it was necessary to develop if the forecasts were to be met.

3.3.11 WMI has also been named specifically in MDS Transmodal’s latest (2017) rail freight forecasts[5], undertaken on behalf of Network Rail and published for consultation in December 2017. WMI is listed as one of the locations where development is anticipated to happen (Paragraph 3.3.2), with WMI embedded in the network’s forecasting, having been used to model all eight rail freight forecast scenarios (Paragraph 10.1).

[4] Rail Freight forecasts to 2023/4, 2033/4 and 2043/4 (April 2013). “Four Ashes/F’stone” is the broad location in the vicinity of the WMI Site.
[5] Rail Freight Forecasts: Scenarios for 2023/24. Final Report, MDS Transmodal (November 2017)

4. Defining the Search Area

4.1.1 In broad terms, the site search area is a geographic area within which a need exists for a SRFI and within which it is appropriate to search for sites that could potentially meet that need. The definition of the WMI site search area has been informed by a number of factors, including the expectations of planning policy, meeting the recognised need, local environmental, infrastructure and other constraints and the proximity to existing and proposed facilities.

4.1.2 The survey information from DIRFT, together with the distance observed between SRFIs in clusters elsewhere in the country, is also helpful in defining a search area for a SRFI to serve the southern Staffordshire and the Black Country.

4.1.3 It is also relevant that the previous ASAs undertaken for Howbury, Radlett and SIFE (as set out in **Appendix 1)** each established a search area which extended 32km (20 miles) from the M25 (i.e. the edge of the conurbation which the SRFIs is intended to serve).

4.1.4 32km was established in the original Savills' Howbury ASA (2004) on the basis that it was considered to represent a reasonable distance given the requirements from prospective occupiers for sites. However, it was noted that, in practice, sites located at the extremity of this distance (i.e. close to 32kms from the M25) would be unable to efficiently and sustainably meet the demands of the London freight logistics industry.

4.1.5 Based on the above, the plan below identifies the search area adopted for WMI.

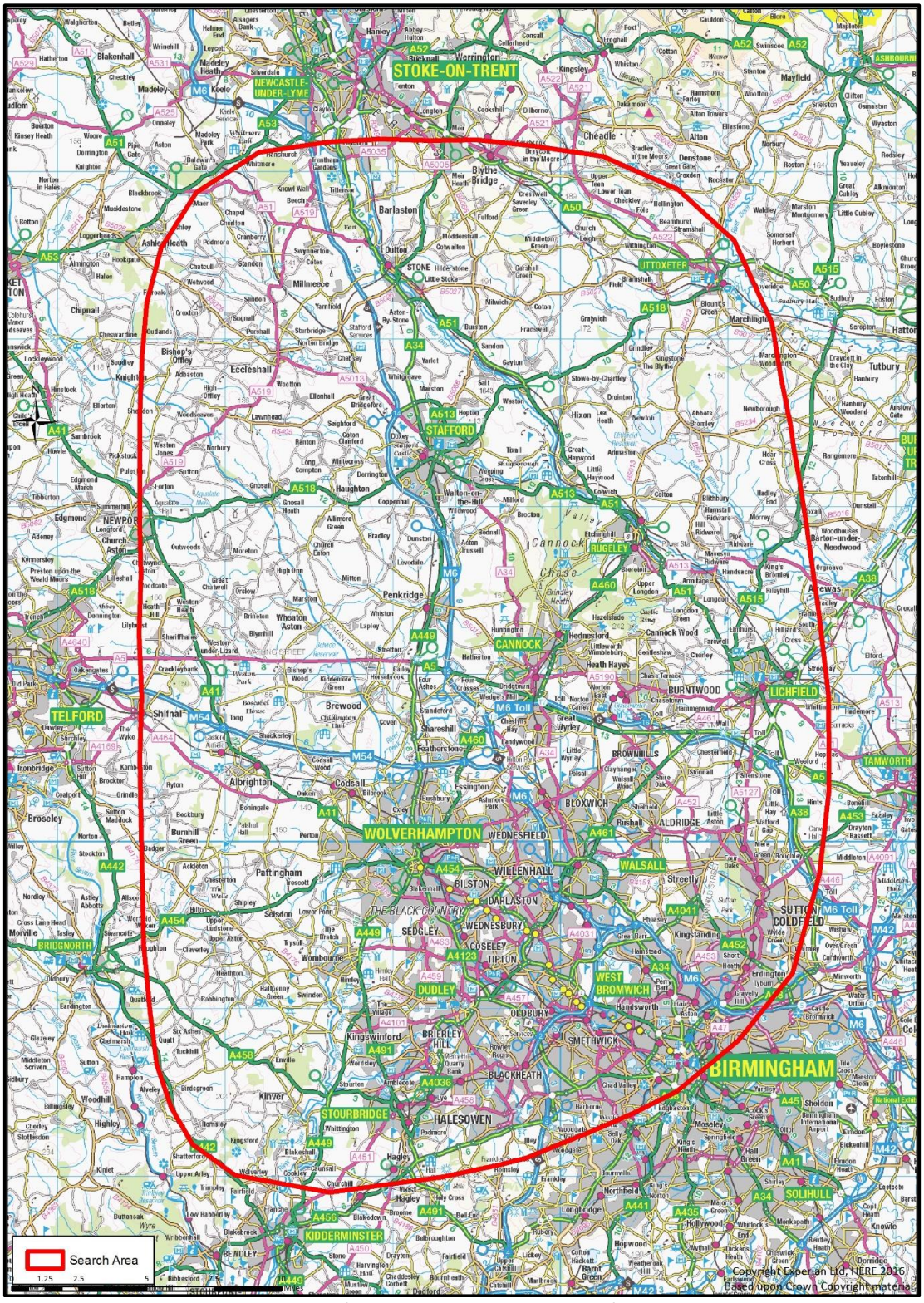


Figure 5 Alternative Site Assessment Search Area

4.1.6 As shown below, the search area includes most of the area of the "*North Black Country and South Staffordshire",* which was identified by the West Midlands Regional Logistics Study (Stage Two, September 2005) as one of the four 'Best Regional Logistics Locations' (page 68). The search area also includes most of the local authorities which make up the "*Black Country and southern Staffordshire*" area identified by the Black Country and southern Staffordshire Regional Logistics Site Study (prepared by URS, April 2013).

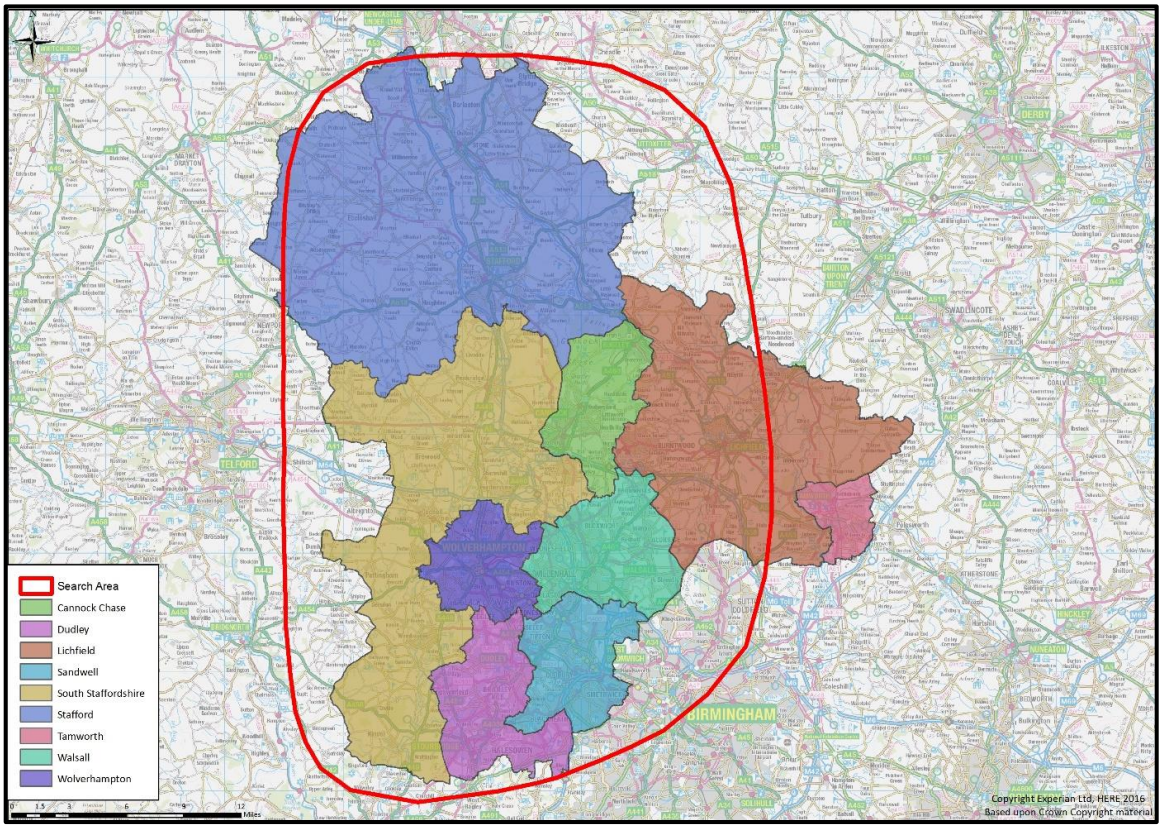


Figure 6 The ASA Search Area and the "Black Country and southern Staffordshire"

4.1.7 The eastern section of Lichfield (beyond Fradley Park) and Tamworth are the only areas which formed part of the "Black Country and southern Staffordshire" but are not included in the ASA search area. Tamworth is a relatively small and densely populated authority and located to the east of the search area, nearing the existing facilities at Birch Coppice and Hams Hall. It would not be sensible or appropriate to locate a new SRFI in this area as the new facility would not be adequately spaced from existing facilities and would not significantly address the identified gap in the network. In this regard, the locations of existing (Birch Coppice and Hams Hall) and planned (Etwall) rail freight facilities have partially shaped the extent of the search area. Whilst the search area will be examined as a whole, locating a SRFI facility to the extremities (particularly to the east) of the search area is

considered to be less preferable and less likely to be effective at meeting the need. This thinking is consistent with Policy PA9 of the West Midlands Regional Spatial Strategy Phase 2 Revision Draft (September 2009) which proposed that the search for a new RLS/SRFI facility or the extension of existing RLS facilities within the region should recognise the proximity of Hams Hall and Birch Coppice and the need to avoid an overconcentration of RLS/SRFI development within the same broad location.

4.1.8 The shape of the search area is also partially derived from the existing rail and road infrastructure. As shown on the refined Search Area maps below. The search area focuses on the north west of the Birmingham/Wolverhampton conurbation and extends north to include the Wolverhampton to Stafford rail corridor. Extending the search area further west would not be sensible or practical as **Figure 9** demonstrates that the rail infrastructure to the west of the Birmingham/ Wolverhampton conurbation is not of a sufficient gauge to support a modern SRFI facility[6].

4.1.9 The northern boundary of the search area is approximately 38km from the M54 / northern boundary of Wolverhampton and, in accordance with the established precedent in previous ASAs, it is considered that sites which are located in the northern extremity of the search area would be less able to efficiently and sustainably meet the demands of the Wolverhampton/Birmingham conurbation. Sites which are located beyond the search area are not considered to be suitable alternatives as they 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.

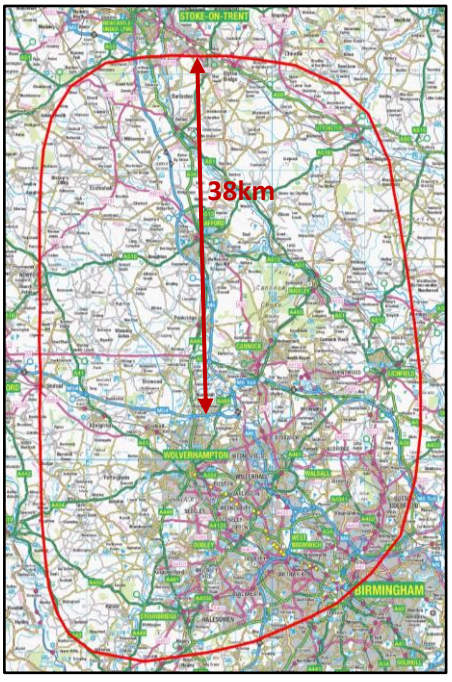


Figure 7 Distance from M54 to the northern boundary of the ASA search area

4.1.10 Therefore, sites beyond the search area have been discounted.

[6] The lack of success of a rail interchange in Telford tells a similar story – a relatively small terminal was built in Telford which is not considered sufficiently centrally located to major markets to be attractive to distributors looking for warehouse locations.

4.1.11 The search area contains:

- 2.3m people in 920,000 households[7];
- 1 million jobs (40% of the employee jobs across the West Midlands)[8]; and
- 71,000 businesses[9].

4.1.12 These businesses are particularly reliant on good logistics support. The value of goods shipped out of the West Midlands has increased significantly in recent years – nearly doubling between 2009 and 2015, whilst the tonnage has increased only slightly, demonstrating that the goods being exported have moved up the value chain and are therefore economically more important.

4.1.13 In 2015 the West Midlands had the highest value per tonne of goods moved out of the region and the third lowest for goods brought into the region. This is consistent with the region's strength in manufacturing and turning low cost raw materials into high value components and finished goods.

4.1.14 A SRFI facility that would be available to this currently under-served market would help reduce the costs of shipping goods in and out of the region, reducing the costs of businesses, making them more efficient and competitive and so making the area more attractive to new businesses. Boosting the profitability and potential for expansion for existing firms.

[7] Office for National Statistics, 2011, Census 2011
[8] Office for National Statistics, 2015, Business Register and Employment Survey 2015
[9] Office for National Statistics, 2016, UK Business – Activity, Size, Location

5. Refining the Search Area

5.1.1 Having established an area within which it is appropriate to search for alternative sites, it is important to consider the fundamental criteria which, if unmet, would prevent a site from being considered a true alternative to WMI. Clearly, it would be inappropriate to consider areas which are not in a reasonable proximity to railway or motorways, or areas which have prohibitive environmental constraints.

5.1.2 Therefore, the search area has been refined using a series of criteria in order to establish a more refined search for suitable sites. The search criteria have been informed by the policy consideration and precedents/best practice reviewed in **Appendix 1**.

5.2 Environmental Constraints

5.2.1 In accordance with the NPS, great weight should be given to conserving landscape and scenic beauty in nationally designated areas. The NPS states that development consent should be refused for developments in National Parks, the Broads and Areas of Outstanding Natural Beauty, except in exceptional circumstances and where it can be demonstrated that it is in the public interest (paragraph 5.151).

5.2.2 As stated in Section 2, the NPS acknowledges that promoters of SRFIs may find that the only viable sites for meeting the need for regional SRFIs are on Green Belt land. On this basis, Green Belt allocation is not included as an environmental constraint which will refine the search area at this stage. The Green Belt allocation forms part of the policy and environmental considerations at the subsequent stage of the ASA when the short-listed sites are assessed in greater detail.

5.2.3 **Figure 8** below shows the nationally designated land in and around the search area which is considered to be less suitable for consideration due to these primary environmental constraints.

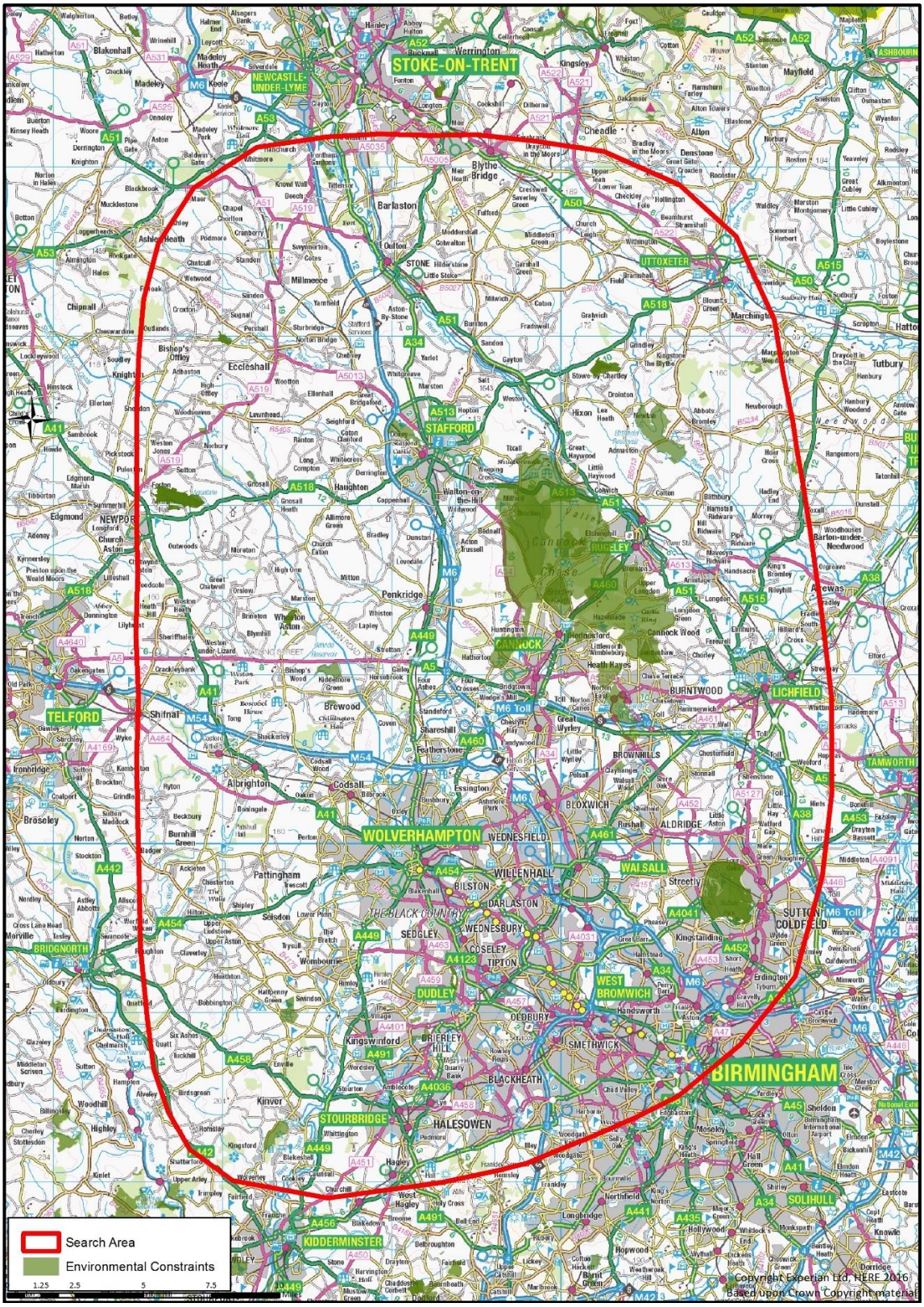


Figure 8 Environmental Constraints within ASA Search Area

5.3 Proximity to Rail Infrastructure

5.3.1 A viable rail connection is essential for a SRFI and the distance, ability to connect to the existing rail line and the extent of the works required for this to be achieved are all key criteria. The engineering requirements, such as the physical and spatial principles of railway design and complying with Network Rail design standards, are also fundamental in assessing the initial viability of proposed sites.

5.3.2 The cost, complexity and potential environmental consequences of creating a lengthy new dedicated rail connection would be prohibitive. To ensure potential sites are not missed, ASAs undertaken elsewhere suggest that a suitable site must be within 5km of a railway, although the need to lay new track any significant distance from a main line would be likely to impose significant viability, ownership and engineering issues.

5.3.3 In accordance with the NPS, a minimum gauge of W8 is required to service a proposed SRFI. Therefore, rail lines that are not currently W8 or above (or planned to be upgraded by Network Rail) have been discounted from the ASA analysis except where upgrading could be possible without rendering the project unviable. As set out in **Appendix 1**, the 5km search criteria was used by the Radlett, DIRFT III and SIFE ASAs. Howbury uses a 2km threshold, reflecting the difficulties in creating longer distance links.

5.3.4 Whilst a 5km threshold is adopted for the purposes of this study, it is acknowledged that this is a conservative study area and sites towards the extremity of this range are unlikely to be realistic alternatives, without undue costs or environmental impacts.

5.3.5 **Figure 9** below shows the land in the search area which is within 5km of an existing railway of gauge W8 or higher.

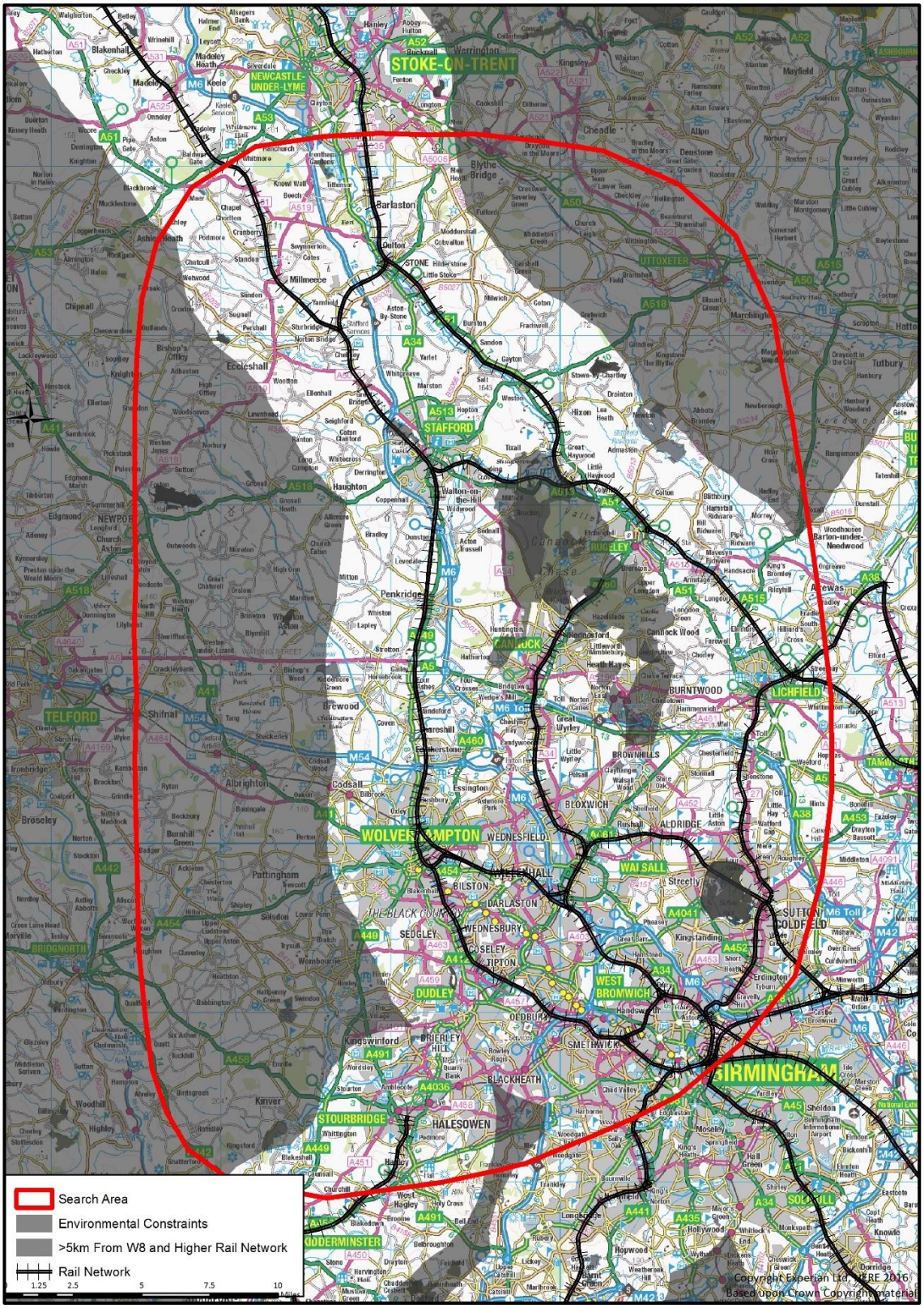


Figure 9 Search area with environmental constraints and 5km distance from rail infrastructure

5.4 Proximity to Highways

5.4.1 The NPS states that proposed new SRFIs should have good road access as this will allow rail to effectively compete with, and work alongside, road freight to achieve a modal shift. Suitable road connections or the ability for such access to be provided without rendering the project unviable is essential if a site is to be considered an appropriate location for a SRFI.

5.4.2 It is not appropriate, however, to consider the potential to create new motorway junctions, given both the cost implications of such an exercise and equally importantly, the Department for Transport's presumption against such new junctions.

5.4.3 On this basis, a 5km threshold has been created around motorway junctions and roads of near motorway standard[10]. Sites which are outside of the 'buffer' are unlikely to be considered to be appropriate or suitable for a SRFI development. However, some potential alternative sites which are on the periphery of the 5km threshold or could achieve suitable highways access have been considered in appropriate cases.

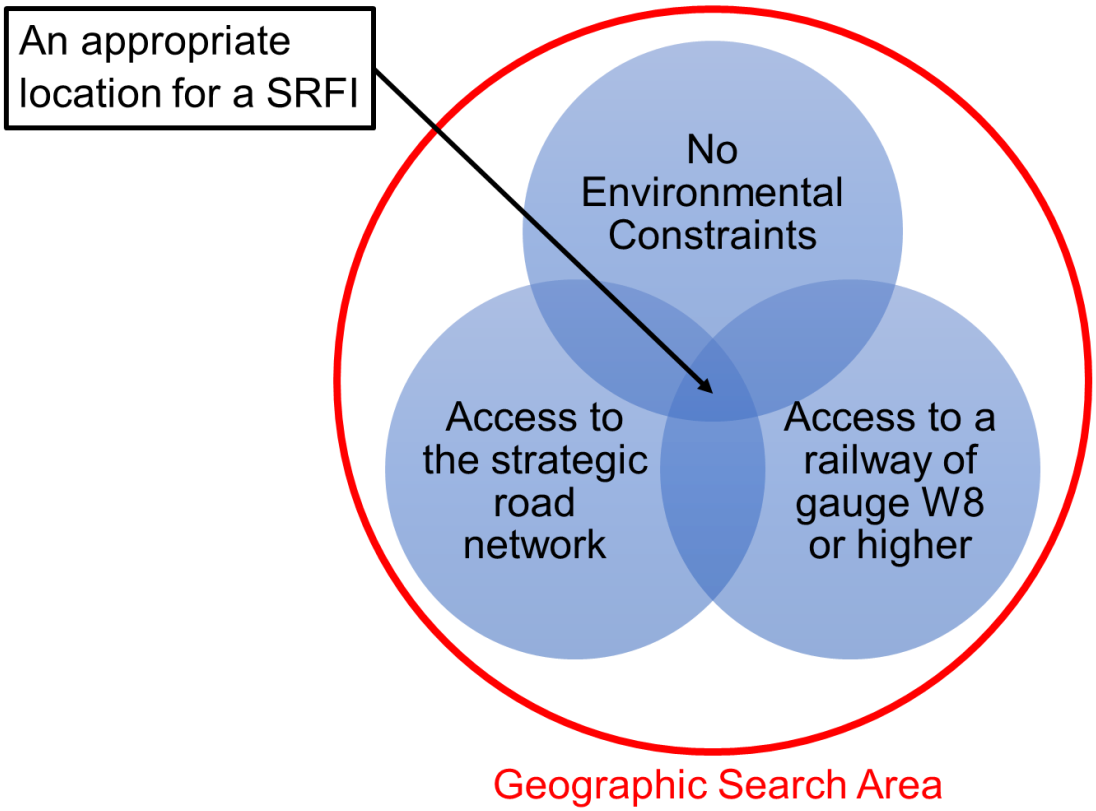
5.4.4 The 5km threshold was also used by the Howbury, Radlett, DIRFT III and SIFE ASAs (please refer to **Appendix 1**).

5.4.5 The following map shows the land within the search area which could potentially have suitable access to both the strategic road and rail networks required to support a SRFI. The fundamental requirement for suitable access to both transport modes is visually represented in the venn diagram on the following page.

5.4.6 As shown by **Figure 10**, the application of these criteria greatly reduces the amount of land on which it could be appropriate to locate a SRFI. These restrictions are directly acknowledged in the NPS, which states that "*given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites."* (paragraph 2.56).

[10] as defined by the DfT Circular 02/2013

5.4.7 More detailed sections of the refined search area are provided at **Appendix 2** for reference.



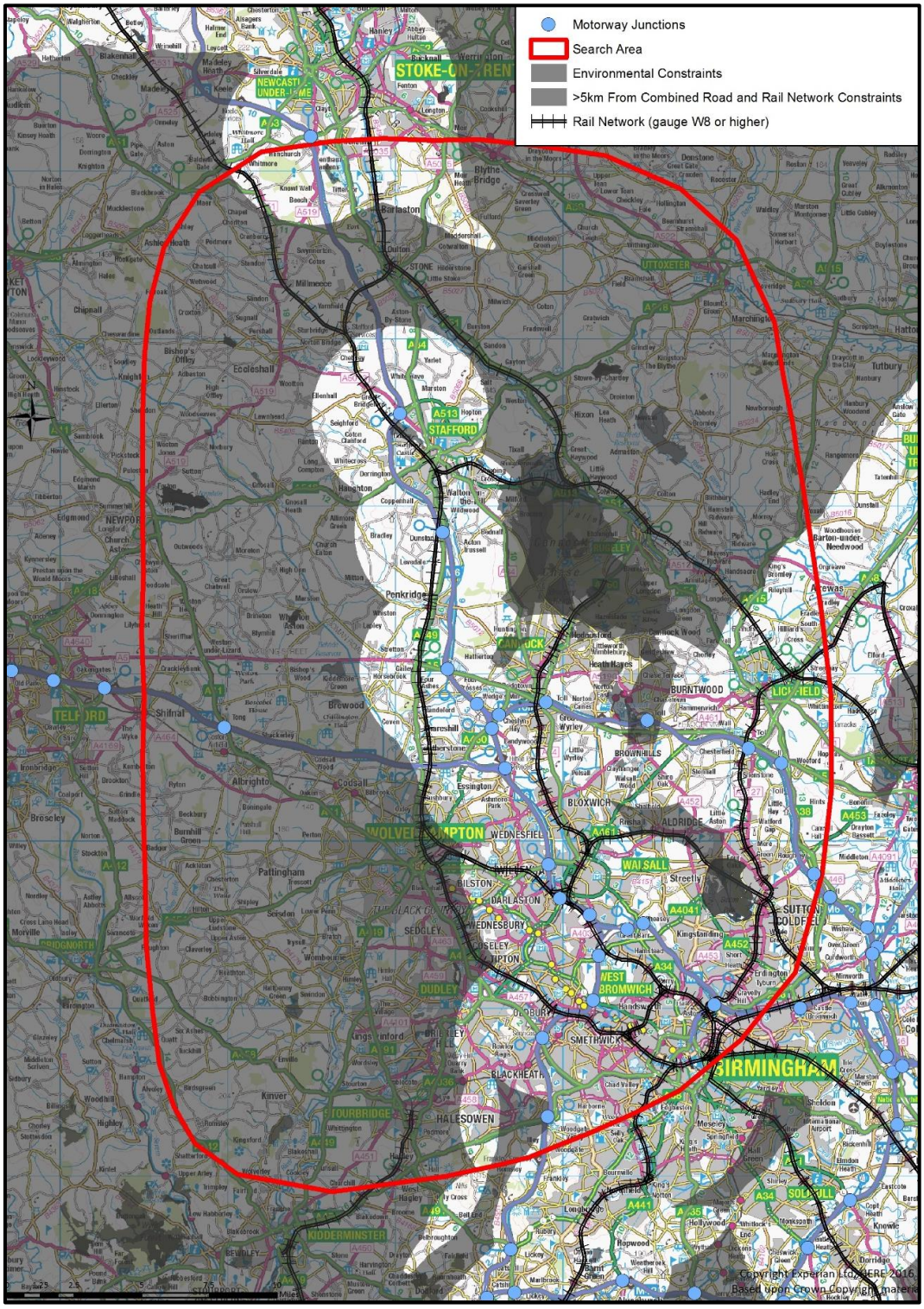


Figure 10: Refined ASA Search Area (showing Environmental Constraints and the combine 5km from Road and Rail Infrastructure)

6. Site Assessment Criteria

6.1.1 This Section defines the criteria to be used to identify the suitability of potential alternative sites within the search area. As set out above, previous ASAs undertook an assessment of sites within their defined catchments against a number of key SRFI/RFI attributes.

6.1.2 The first three site criteria have been identified above (i.e. environmental constraints and access to road and rail) and, by using them to refine the search area, all potential alternative sites which are subsequently identified will, in principle, meet these essential criteria. However, there is still merit in considering accessibility to rail and road in greater detail when assessing individual sites. As explained above, a site's relative proximity to the railway, even within the 5km buffer, would be likely to have varying cost, ownership and/or engineering issues.

6.1.3 Therefore, in accordance with the previous ASAs and planning policy documents, the following further site assessment criteria have been adopted for this Study:

- **Ability to access rail infrastructure** – 5km from a rail line with gauge W8, or above, is a very broad search criteria. Therefore, it is still important to consider the cost, ownership and/or engineering implications of connecting to the rail infrastructure. New connections must enable 775m length trains to be moved on and off the main line in one single movement to make best use of available capacity. The engineering requirements of Network Rail standards impose limits for maximum gradient, and minimum radius of rail curvature, which differ for mainline and sidings. The relationship between these limits and the 775m length requirement means that, practically, the most suitable connection location will be on a stretch of the mainline that provides a long straight line and that is at-grade or on a shallow constant gradient.

- **Ability to access the strategic highways network** – as above, any sites which do not meet the fundamental criteria of 5km from a motorway junction or 'roads of near motorway standard', will have already been filtered out. However, a site's ability to access the road infrastructure easily, affordably and with minimum disruption is fundamentally important.

- **Site Size and Orientation** – Sufficient site length/depth should be available to move full length (775m) trains on and off the main line in a single

movement without shunting or splitting. The orientation of the site is also important, to ensure that engineering requirements for railway design can be met. Network Rail's minimum limits for radius of curvature (150m) and maximum gradient (1 in 500) for sidings will govern the track layout design for a particular site. An ideal site orientation would run parallel to the existing mainline. This would reduce the complexity of the track design and the associated costs. Sufficient land is also needed to enable development of the rail infrastructure and associated warehousing. Whilst the WMI proposals take up approximately 300 hectares, an appropriate level of flexibility needs to be adopted within the ASA and it would be pre-determining to set the size threshold to reflect/suit the WMI masterplan. As summarised at **Appendix 1**, Howbury and DIRFT III used 40 hectares as the minimum site size for a potential alternative, however, the NPS identifies a site area threshold for SRFIs of 60 hectares. The NPS also makes it clear that a larger number of smaller rail freight interchange terminals would not be a viable nor desirable option for addressing the identified need for SRFIs (Table 4, page 23). The NPS recognises that there is a place for local terminals, however, it is determined that *"these cannot provide the scale economies, operating efficiencies and benefits of the related business facilities and linkages offered by SRFIs*". Therefore, this ASA has set a minimum threshold of 60 hectares in identifying true alternative sites. Given the scale of the recognised need for rail-based warehousing in the area, it is clear that more than one SRFI of this scale or a single SRFI of a much larger scale is required – but the search has used this relatively small site area criteria in the first instance.

- **Relationship with other land uses** – a site's designation and its potential incompatibility with neighbouring uses such as populated residential areas or environmentally sensitive land is an important criterion.

- **Planning Policy** – a site's local and/or regional policy allocation in a development plan is a relevant consideration in terms of any alternatives uses identified for a site.

- **Topography** – whilst the NPS does not provide any guidance in respect of topography, the need for a relatively level site to accommodate train movement is a critical operational requirement for any SRFI site. For

example, a maximum gradient of 1:500 on standing sidings on site[11] will need to be created. The effects of the topography can also greatly impact the engineering complexity of the rail connections to the existing mainline. As such, sites where achieving a relatively flat site is impractical, are discounted.

- **Availability** – a site's potential availability is a relevant consideration. Sites with active uses and sites with granted outline or full planning permission as well as those with applications pending consideration are deemed unavailable. Also, a site which is not being promoted for development but is in multiple and fragmented ownership is less likely to be a viable alternative.

6.1.4 Whist not a primary search criteria, another relevant consideration will be the proximity of the site to the centre of demand – i.e. the Birmingham/Wolverhampton conurbation. In accordance with the NPS, SRFIs should be located relative to the markets they will serve (paragraph 4.84) in order for the secondary road distribution leg to be minimised and efficient. In addition, as demonstrated by the DIRFT III Need Report, a SRFI has a relatively local rail related catchment area.

[11] Network Rail Track Design Handbook, section A.8.9a – where possible, standing or berthing sidings should be on the level. Where this is not possible, the track gradient of sidings where vehicles stand shall not be steeper than 1:500 and should not fall towards the running line connections.

7. Identifying Alternative Sites

7.1.1 For the purposes of this ASA, a 'site' has been defined as:

- an individual area of land contained within a defined boundary (e.g. a single field, existing brownfield site, etc); or
- a group of adjacent areas of land which, when combined, can form an individual area of land contained within definable boundaries (e.g. a grouping of adjacent fields or brownfield sites).

7.1.2 A defined boundary is considered to be a highway, railway line, river, canal, lake / reservoir, an adjacent development or a significant change in geographical relief.

7.1.3 Several different methods were used to search comprehensively for potential alternative sites and to reduce the risk of not identifying a site. These methods are detailed below.

7.2 Documented Sites

7.2.1 A detailed review of existing and emerging planning documents was undertaken to identify potential alternative sites.

7.2.2 The following are all of the counties and district authorities which are within (whole or in part) the search area.

County	District
Staffordshire	Stafford
	South Staffordshire
	Cannock Chase
West Midlands	City of Wolverhampton
	Walsall
	Dudley
	Sandwell
	Lichfield

7.2.3 For each of the counties and districts listed above, the following documents were reviewed (where relevant):

- the current Local Plan;
- Site Allocation DPD and Core Strategy;
- any current Employment Land Studies or Logistics Site Studies;
- Strategic Housing Land Availability Assessments;
- any schedule of available employment land; and
- the County Minerals and Waste Plans.

7.2.4 The full list of planning documents reviewed is included at **Appendix 3**.

7.2.5 Sites which are allocated or identified within the documents for employment, mixed or other uses were included but sites allocated or identified for housing were not. Only existing or proposed employment sites with more than 60ha of vacant or potential expansion land were included, although consideration was given to the potential for sites to be amalgamated. Occupied employment sites with existing business operations cannot realistically be considered available for redevelopment and were, therefore, discounted.

7.3 Planning Document Search Results

7.3.1 The review of the planning documents identified 4 allocated sites which may have the potential to accommodate a form of SRFI development.

Ref	Site	Approx. Size
1	Meaford Power Station	65ha
2	Mid Cannock Colliery/Poplars Landfill Site	100ha
3	ROF Featherstone	120ha
4	Rugeley Power Station	150ha

7.3.2 As shown on **Figure 12**, Meaford Power Station and Rugeley Power Station do not fall within the area which matches the 5km combined road and rail threshold. However, both sites are directly adjacent to rail lines, are above the 60ha threshold and are brown-field sites being promoted for employment uses. Therefore, it is considered that they are worthy of further assessment.

7.4 Undocumented Sites

7.4.1 A close examination of the search area was undertaken to identify any further sites with the potential to accommodate a SRFI, whether identified in planning policy documents or not.

7.4.2 The land within the refined search area is already known to be within 5 km of the strategic road and rail networks and, therefore, a field study and map search was undertaken to attempt to identify any additional locations with the ability to create a 60 ha or larger site. By definition, because they are not documented in planning documentation such sites will be outside the current built-up area.

7.4.3 The refined search area was cross-referenced with the relevant Local Plan Proposals Map to avoid identifying sites which may have been identified/ discounted in the Planning Documents search.

7.4.4 Once broad locations/areas were identified as potentially suitable for a SRFI development, the design and engineering team were asked to consider if an appropriate development site could be formed using the required development criteria (i.e. access to road and rail and sufficient space for development) with consideration of the defined boundary such as highways, railway lines, river, canal or adjacent developments. The design and engineering team were asked to consider if variations to the alternative sites' boundaries or scale could avoid potential environmental impacts, thereby ensuring that undocumented alternative sites are not discounted for reasons which could be avoided through changes to the boundary or design.

7.5 Undocumented Sites Search Results

7.5.1 The map search resulted in the identification of three potentially possible SRFI sites within the search area. These sites are listed below and have been added to the long-list of potential sites.

Ref	Site	Approx. Size
5	Dunston	+200 ha
6	Creswell	+250 ha
7	Stafford West	120 ha

7.5.2 The map search confirmed what is established in the planning policy review found in the **Planning Statement** [Document 7.1A], namely that there are no sites within the Black Country of a sufficient size to potentially accommodate a SRFI (see **Figure 11** below which demonstrates the density of the area). 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 60ha. Furthermore, whilst 5 km from an existing rail line is an initial threshold for refining the search area, it is clear from the map search that a search area 5 km from any existing rail line in the Black Country generally involves crossing numerous different roads and developed areas. The cost and impracticality of such a rail connection would render any development undeliverable.

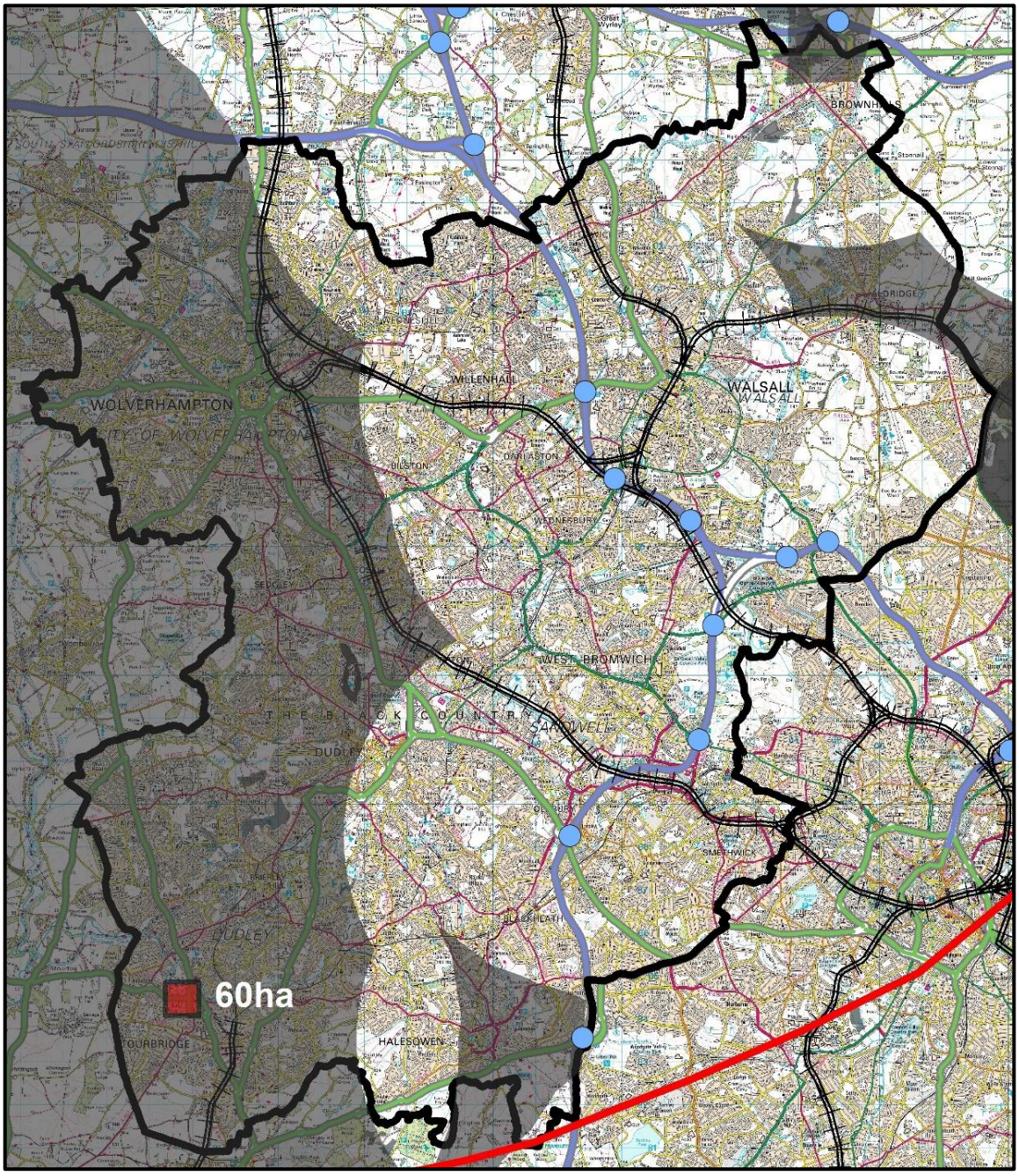


Figure 11 The Black Country boundary – the red box is approximately 60ha

7.5.3 The map search then focused on the rail corridor from Wolverhampton to Stafford. The rail line was followed north from the M54 and sites were investigated which appeared to be of an appropriate size and which could potentially access the strategic road network. However, even in this much less dense area, there are still numerous physical constraints which rule out large portions of the search area owing to the complexity of the engineering solutions that would be required to

overcome them. For example, it would be inappropriate to identify a site to the east of the M6 within the Wolverhampton to Stafford corridor. This is because the necessary connection to the rail line would be required to cross over or under the motorway. Fundamentally, the engineering complexity, associated impacts and costs of providing a rail crossing over or under the M6 would render the development unviable. The indicative cost to create a new single track plain rail line at-grade is approximately £3,000 per metre but creating a single-track bridge over major road/railway (such as the M6) would increase to approximately £77,000 per metre.

7.5.4 On this basis, as the NPS anticipates, there are few potentially suitable sites and any such sites occupy a countryside location. Only sites at Dunston (the open countryside west of Junction 13 of the M6), Stafford West (a green field site located south of M6 services with potential rail access via the existing stub and disused trackbed of former Shropshire Union Line) and Creswell (the land west of Junction 14 of the M6) were identified.

7.6 Sites Proposed Through Consultation

7.6.1 Stage 1 consultation for the WMI project was carried out from 13 June to 24 July 2016, Stage 2 took place between 5 July and 30 August 2017 and a focused round of consultation, Stage 2a, took place from November 2017 to January 2018. For further information on the consultation process and a summary of all the public responses please refer to the **Consultation Report** [Document 5.1].

7.6.2 The consultation responses from the local community and statutory consultees were reviewed and any reference to a potential alternative site was recorded.

7.6.3 Any specific sites which were suggested as potential alternatives are listed below. Some of these sites have already been identified as potential alternatives by the planning document and map search, however, others were also identified earlier by the project team but have been discounted for not matching one or more of the fundamental search criteria. Therefore, no new sites were identified by the consultation process. However, for clarity, all sites raised during consultation are all listed in the following table.

Site	Approx. Size	Notes
Land South of Four Ashes	-	The area south of the WMI Site is entirely within the Green Belt and is not promoted for development of any sort. It was examined for a potential SRFI site, however, a site of a suitable size (+60ha) and connection could not be identified in this area owing to the amount of existing infrastructure (Deepmore Lane, Old Stafford Road, Laches Lane) and the two floodplains/watercourses (Saredon Brook and the Staffordshire and Worcestershire Canal). The most significant engineering constraint is the proximity of Old Stafford Road and the Staffordshire and Worcestershire canal to one another, near to Slade Heath. These constraints lie where the northern spur rail connection to the mainline would most likely be required. Any engineering solution to construct a spur here would be significantly challenging and complex, require major crossings and realignments, and would cause substantial disruption at Slade Heath.
Land at Junction 11	-	Land in the vicinity of Junction 11 was studied to determine if a suitable SRFI site could be identified, however, the distance of the junction from the WCML and the existing infrastructure between the rail lines (to the east and the west of the junction) and the junction discounted the area from consideration as a suitable alternative. Furthermore, the existing mainline to the west is on an embankment (approximately 3-4m). Spur connections to the mainline would require significant civils engineering works and large quantities of fill to tie in. An engineering solution is unlikely without substantial amount of property purchase/compulsory purchase and

		engineering works. This is not considered to be suitable.
Telford	approx. 15ha	It was suggested that an extension to the Telford International Rail Freight Park would be appropriate. However, Telford is located beyond the search area, on a rail line that is below gauge W8 and does not have adequate space for expansion. Furthermore, Telford International Rail Freight Park has failed to establish itself as a viable rail freight terminal and is considered to be in a "too peripheral location to attract any significant large-scale distribution development in the future" (West Midlands Regional Logistics Study Stage One, 2004). For this reason, it is not considered to be a suitable or appropriate alternative site.
Dunston	approx. 200ha	This site was also identified in the map search exercise and will be considered in detail in the following sections.
Rugeley Power Station	approx. 100ha	This site was also identified by the planning policy search exercise and will be considered in detail in the following sections.
Featherstone	approx. 110ha	This site was also identified by the planning policy search exercise and will be considered in detail in the following sections.
Etwall	approx. 250ha	Proposals for a separate SRFI at Etwall are currently being progressed (referred to as the East Midlands Intermodal Park). Etwall is outside the search area for WMI and is planned to meet a separate identified need.
Bescot Rail Sidings	approx. 40ha	The sites limited size, below the 60ha fundamental criteria, 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. On this basis, Bescot Rail Sidings is not considered to be a suitable or appropriate alternative site.
Meaford Power Station	approx. 65ha	This site was also identified by the planning policy search exercise and is be considered in further detail in **Appendix 4**.
Washword Heath	approx. 45ha	This site is approximately 45ha and a portion of it is safeguarded for HS2's rolling stock maintenance depot. Therefore, on the basis that it is too small, the site is not considered to be a suitable or appropriate alternative.

7.7 The Long-List of Sites

7.7.1 A comprehensive and detailed approach was taken to search for and identify potential SRFI sites. This has resulted in the identification of the following long-list of potential SRFI sites which are worthy of further consideration.

Ref	Site	Source
1	Meaford Power Station	Policy Documents Search
2	Mid Cannock Colliery/ Poplars Landfill Site	Policy Documents Search
3	ROF Featherstone	Policy Documents Search
4	Rugeley Power Station	Policy Documents Search
5	Dunston	Map Search
6	Creswell	Map Search
7	Stafford West	Map Search
8	WMI	Proposed development site

7.7.2 A map of the long-list sites is included at **Figure 12** on the following page.

7.7.3 A detailed appraisal of the performance of each of the eight long-listed sites is provided in **Appendix 4** to this report. Each site is assessed against the seven SRFI criteria listed at paragraph 6.1.3, with a detailed explanation provided of its suitability or otherwise.

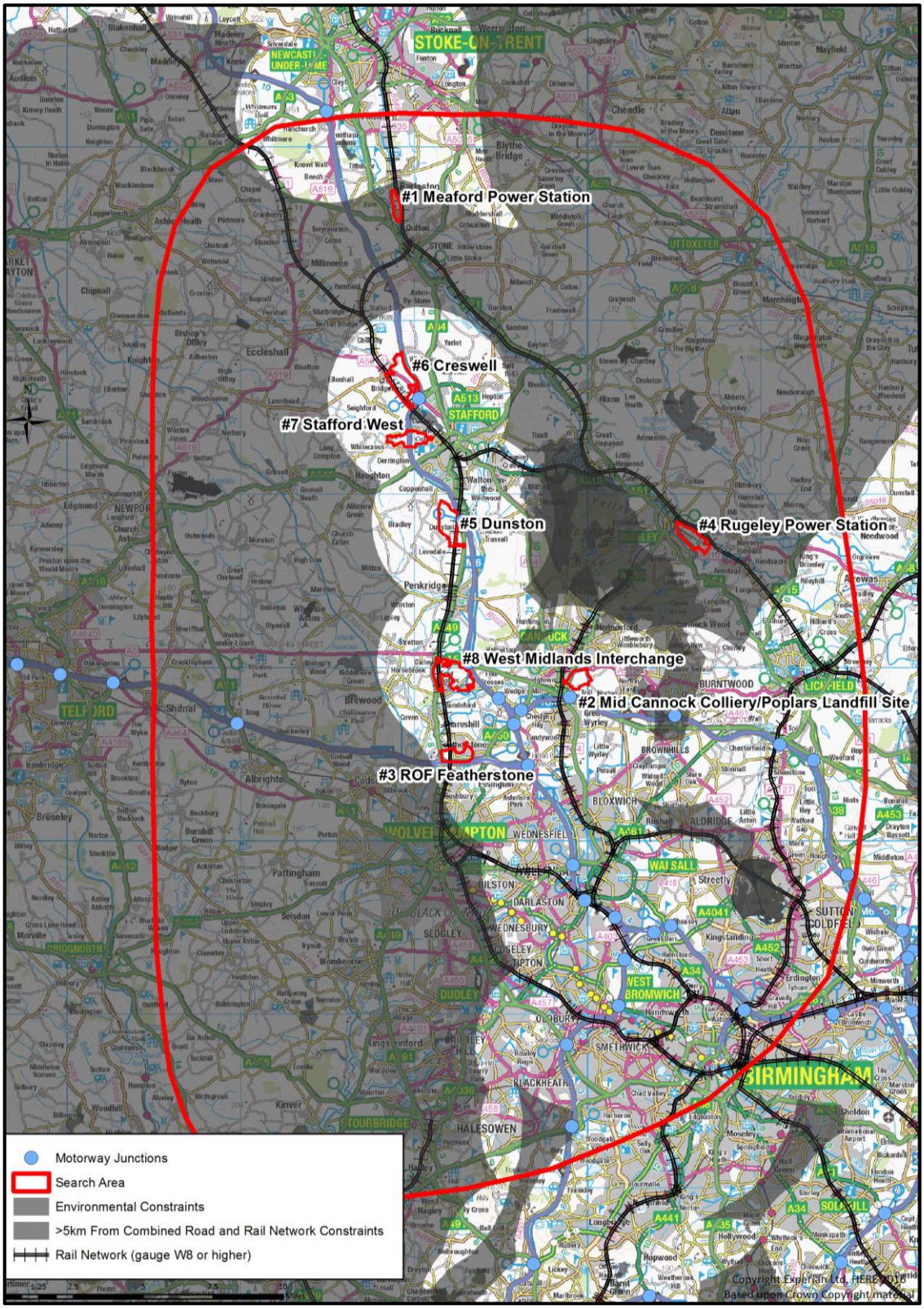


Figure 12 Map of Long-List Alternative Sites

8. Alternative Site Assessment

8.1.1 The assessment of the alternative sites is a two-stage process. First, a long-list of potential alternative sites is assessed against the criteria listed at paragraph 6.1.3 above. The sites identified in the long-list have been assessed to appraise their suitability in principle for the development and successful operation of a SRFI.

8.1.2 This first stage 'filters out' sites which would be prohibitively constrained to the extent that they are fundamentally unsuitable as a SRFI development site. The sites that pass through the first filter are then short-listed and evaluated/weighed against one another to determine which site is the most appropriate.

8.2 Assessment of Long-List Sites

8.2.1 The criteria used to assess the long-list of sites are listed in Section 6 above.

8.2.2 A 'traffic signal' colour scheme is used to represent a site's performance against the identified criteria in the following way:

- **Green** – Site/location characteristics are considered appropriate and could allow a SRFI;
- **Amber** – Site/location characteristics are constrained, however, there may be potential to overcome through mitigation/engineering; and
- **Red** – Site/location characteristics are considered to be prohibitively constrained making it unsuitable as a SRFI development site.

Ref.	Site Name	Size	Rail Connectivity	Road Connectivity	Relationship with other land uses	Planning Policy	Topography	Availability
		Fundamental Criteria			Additional Criteria			
1	Meaford Power Station							
2	Mid Cannock Colliery/ Poplars Landfill Site							
3	ROF Feathers tone							
4	Rugeley Power Station							
5	Dunston							
6	Creswell							
7	Stafford West							
8	WMI							

8.3 Results of the Long-List Filter

8.3.1 The outcome of the initial assessment was that three sites failed to meet one or more of the fundamental criteria, as explained in detail at **Appendix 4** (i.e. Meaford Power Station, Mid Cannock Colliery/Poplars Landfill Site and Stafford West). In summary, of those sites identified from the planning policy search, only the potential expansion to ROF Featherstone and Rugeley Power Station present

potential opportunities to accommodate a SRFI development. These sites are larger than 60ha and may potentially, therefore, accommodate a SRFI development (albeit smaller than that proposed at WMI); rail and road connection could potentially be achieved; and the sites' topography and planning policy context could potentially allow for rail-freight development. Rugeley Power Station is relatively distant from the strategic highway network and peripheral to the area of need. However, the site has been involved in the short-list given its performance against all of the other site assessment criteria.

8.3.2 The three undocumented sites identified from the map search (i.e. Dunston, Creswell and Stafford West) are all large enough in principle to accommodate a SRFI development and they may all have the potential for connection to the strategic rail network. However, Stafford West could not effectively link to the strategic road network without creating an entirely new junction on the M6. The scale and cost of creating a new motorway junction would render the site unviable. On this basis, Stafford West has not been included on the shortlist of alternative sites.

8.3.3 WMI meets the three fundamental criteria. The site is located within the Green Belt and residential uses are located in close proximity. However, the NPS notes that, given the locational requirements of SRFIs, it may be that the only viable sites for meeting the need for regional SRFIs is on Green Belt land. Possible impacts on the neighbouring residential uses could potentially be overcome through robust mitigation and engineering. Therefore, WMI is included in the shortlist of alternative sites.

8.4 Assessment of Short-List Sites

8.4.1 The assessment of short-listed sites looks at the comparative merits of WMI and the four other sites which passed through the long-list filter. The five sites which make up the short-list are:

- ROF Featherstone;
- Rugeley Power Station;
- Dunston;
- Creswell; and

- WMI.

8.4.2 As explained above, a full appraisal of the suitability of the proposed WMI site from a planning and environmental perspective is assessed within the **Planning Statement** [Document 7.1], **Environmental Statement** [Document 6.2] and **Design and Access Statement** [Document 7.5]. However, to provide a comparison with the alternative sites assessed in this report, it is considered appropriate to review WMI's merits against the same criteria as the other four short-listed sites. All short-listed sites have been compared in a comprehensive assessment of both market and sustainability constraints. The purpose of this work is to establish the potential for the short-listed sites to accommodate a SRFI, to understand how these locations could operate and if they have the potential to be an alternative to the proposed location of WMI. The environmental impacts of developing these sites are also assessed in absolute terms, and compared to the WMI site.

8.5 Assessment Criteria of Short-List Sites

8.5.1 The short-list sites have been assessed in greater detail using the following principal planning policy criteria:

- Size/capacity;
- Topography;
- Rail Connectivity;
- Road Connectivity;
- Policy and Environmental considerations:
    - Land use policy;
    - Landscape;
    - Heritage;
    - Air quality and noise;

- Ecology; and
- Hydrology / Flood Risk.

8.5.2 An assessment of the relative performance of each site against the criteria provides an overview of the key impacts of developing each location. It is accepted that environmental impacts extend beyond the range of topics identified, but for the purposes of this comparative assessment, this scope of appraisal is considered appropriate.

8.5.3 The WMI specialist consultants contributed to the assessment of the short-list sites and undertook desk-based assessments and site visits to the various short-list sites. The environmental considerations were assessed by a desk-based review of information from the public domain for each site. The study information has been used alongside professional judgement to describe and evaluate features and constraints at each site. Site constraints were assessed both in terms of potential environmental impacts should the site be developed for a SRFI use (for example, impacts to ecological receptors resulting from loss of habitats), and in terms of impacts to the site from environmental factors (for example, impacts on the site layout from flood risk). Where appropriate, an estimate of the scale the constraints is provided, based on professional judgement, the information sources outlined above and experience of previous projects and scenarios, categorised as follows:

- High – the constraint could prevent the development from securing the granting of a DCO within the bounds of the relevant policy/legislative context, could result in environmental impacts which might not be sufficiently mitigated, and/or could necessitate engineering or design solutions that would render development impractical;
- Moderate – the constraint may result in objections through the DCO process from statutory consultees and may result in technical challenges in order to achieve the aims of the potential project within the bounds of the relevant policy/legislative context, could result in the need for comprehensive mitigation measures to be agreed with the relevant authority/consultee, and/or could require significant attention through the design process to overcome; and
- Low – the constraint may result in objections through the DCO process from statutory or non-statutory consultees and result in environmental impacts

that would be either minor or relatively simple to overcome through mitigation or appropriate design.

8.6 Short-List Site 1: ROF Featherstone

Introduction

8.6.1 A plan of the ROF Featherstone Site is included at **Appendix 4**. The site is located immediately north of the M54, between Junctions 1 and 2 in South Staffordshire District. The site borders the prison complex comprising HMP Oakwood and HMP/YOI Brinsford to the north, the M54 to the south, suburban housing at Featherstone to the east and the A449 to the west.

8.6.2 The majority of the site formerly comprised a Royal Ordnance Site, used for the production and storage of munitions during World War II.

8.6.3 The site, although partly occupied by agricultural fields, is partly situated within an urban setting, on the northern outskirts of Wolverhampton and to the west of Featherstone. The site is located immediately adjacent to residential receptors at Featherstone to the east, Coven Heath along the A449 to the west, along Brinsford Lane which forms the north-western boundary of the site and to the north of the site along East Road. A number of residential properties along the A449 to the west are located adjacent to the site.

Figure 13 Aerial Image of ROF Featherstone Site

Size/Capacity

8.6.4 ROF Featherstone is approximately 120ha. The site is not understood to be in single ownership but has been notionally assembled for the purposes of this ASA. The site is physically constrained by the prison to the north, residential development to the east, the M54 to the south and the A449 to the west. The site is also split by the railway line, with the majority of the site located to the east of the line.

8.6.5 The following illustrates a possible layout for a SRFI at this site, however, a number of issues and constraints are apparent and are set out in the following subsections.

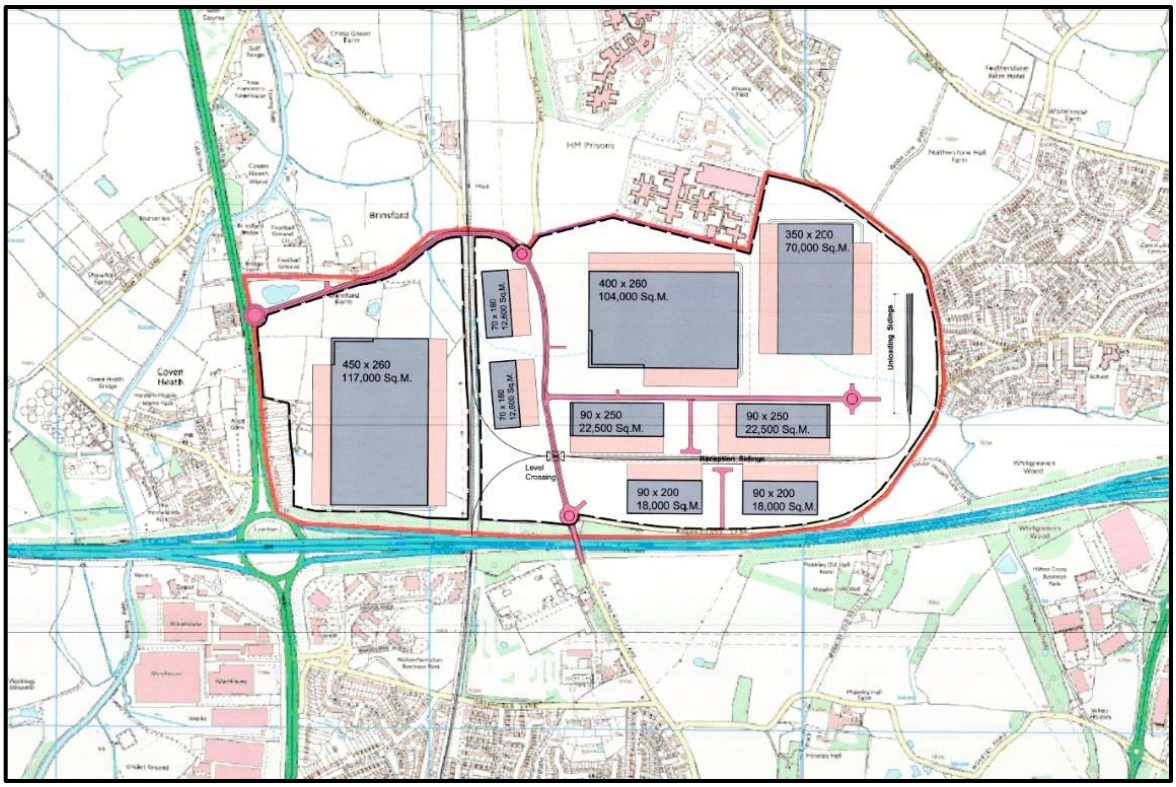


Figure 14 A previous illustrative SRFI layout at ROF Featherstone

Topography

8.6.6 The site is relatively level, with a slight fall from east to west.

Rail connectivity

8.6.7 Like WMI and the three undocumented potential alternative sites, ROF Featherstone benefits from being bisected by the WCML. The site has over 1.3km of frontage onto the main line. However, there is not sufficient space along the main line between the M54 and Brinsford Lane to accommodate a full-length terminal with direct mainline access. Major land acquisition and engineering works would be required, including the reconfiguration of Brinsford Lane and Dark Lane and the demolition of properties along Dark Lane, in order to accommodate the full-length terminal. Alternatively, a full-length terminal could potentially be located perpendicular to the main line, just south of the original prison complex (as shown above). However, this would require connection line(s) to run east from the main line at a radius curve in excess of 400m, to accommodate full length sidings within the site boundary. Rail tracks at these curvatures are known to lead to significant noise impacts as well as long term maintenance issues for operators.

8.6.8 On this basis, whilst feasible, the difficulties in accommodating the required rail infrastructure undermine the site's suitability and the close proximity of the site to residential development and HMP Featherstone (Category C men's prison) raises potential concerns about noise and visual impact on local residents and/or security concerns for operations on site. These matters represent significant constraints to the successful operation of rail facilities.

Road Connectivity

8.6.9 The site is located immediately north of M54 Junction 2, east of the A449. The A449 in this location is a dual carriageway under the control of Highways England although there are at grade junctions and direct residential accesses on the A449. The site area selected for the ASA includes a direct frontage with the A449 and hence extends further west than the area identified for development in the draft South Staffordshire Site Allocations Document (Submission Plan September 2017) (further details below).

8.6.10 24ha of the site are currently allocated for employment use and the emerging Site Allocation Document (Submission Plan September 2017) proposes to allocate 12ha of additional employment land at ROF Featherstone. However, a transport assessment undertaken by South Staffordshire Council has revealed numerous constraints in the surrounding area that have an impact upon the accessibility of

the site for all vehicle types. These include physical barriers as well as existing or potential constraints to be mindful of when considering future access routes[12].

8.6.11 Subject to the provision of substantial highways access improvements, which are likely to need to include the delivery of a new road to the south of the M54 utilising the existing motorway underpass on Cat and Kittens Lane or a new link road over the WCML to the A449 sufficient access may be possible. Funding constraints for these improvements are uncertain but, for the purposes of this ASA, it has been assumed that the highway infrastructure proposed as part of the allocation could be forthcoming at some point. The table below sets out the highway position if the site is considered in the absence of the highway improvements proposed.

Strategic Road Network	Distance from Site	Route to access Strategic Road Network	Undesirable characteristics
M54 J2	500M	Route 1 –A449 SB,	Residential direct frontage, but generally set back.
M6 J11	3.6 km	Route 2-A449 SB, M54, A460	Residential direct frontage, but generally set back.
M6 J12	7.5 km	Route 3 – A449 NB, A5 EB	Some direct frontage
A5	6km	Route 3-A449 NB	Residential direct frontage

8.6.12 In these circumstances, all SRFI traffic at the site in this location would use the A449. There are direct accesses to 40 properties on the A449 south of Brinsford Lane but these are set back from the A449 and have a parking lane. To the north of Brinsford Lane, traffic accessing the A5 and M6 Junction 12 would use the Gailey roundabout.

[12] ROF Featherstone Viability and Delivery Options Study (December 2013)

8.6.13 Use of the A449 south to the M54 may result in the need for further improvements and upgrades to M54 Junction 2. This junction has already been significantly upgraded by the neighbouring i54 development. Therefore, it may be difficult and costly to identify further significant improvements.

8.6.14 The site area extends to Cat and Kittens Lane which is currently used for access to the existing industrial uses in the area. The existing road then continues south of the M54 and east to Featherstone, both residential areas. This means that controls would need to be applied to prevent all access to the south and east with the possible exception of local movements with the result that the only practical means of access to a SRFI would be from the existing road network via A449 near Brinsford Lane.

8.6.15 In combination, these highway constraints would rule the site out for SRFI development. It's suitability as a potential alternative site, therefore, depends upon the implementation of the substantial highways access improvements set out in the emerging Site Allocations Document.

8.6.16 First, the option to include a new link road over the WCML to the A449 (shown as Option 7 and 8 on the plan below) would cut through a large portion of the site, reducing the development potential of the land between the A449 and the WCML. This option would also require the construction of a bridge to span the WCML and the new rail connections which would be required for a SRFI development. It is considered that the scale, cost and impact on developable land of creating this new access could potentially be prohibitive to a SRFI development which requires more land than the emerging Site Allocations Document's is intending to provide.

8.6.17 The second option would be a new road to the south of the M54 utilising the existing motorway underpass on Cat and Kittens Lane (shown as Option 9 on **Figure 15** below). The new access road would join up to the existing roundabout with the A460 to the east. If this access strategy is developed together with a direct SRFI access onto the A449 then the access arrangements may be acceptable, with M54 eastbound traffic being able to use M54 Junction 1, thereby avoiding any possible upgrade at Junction 2.

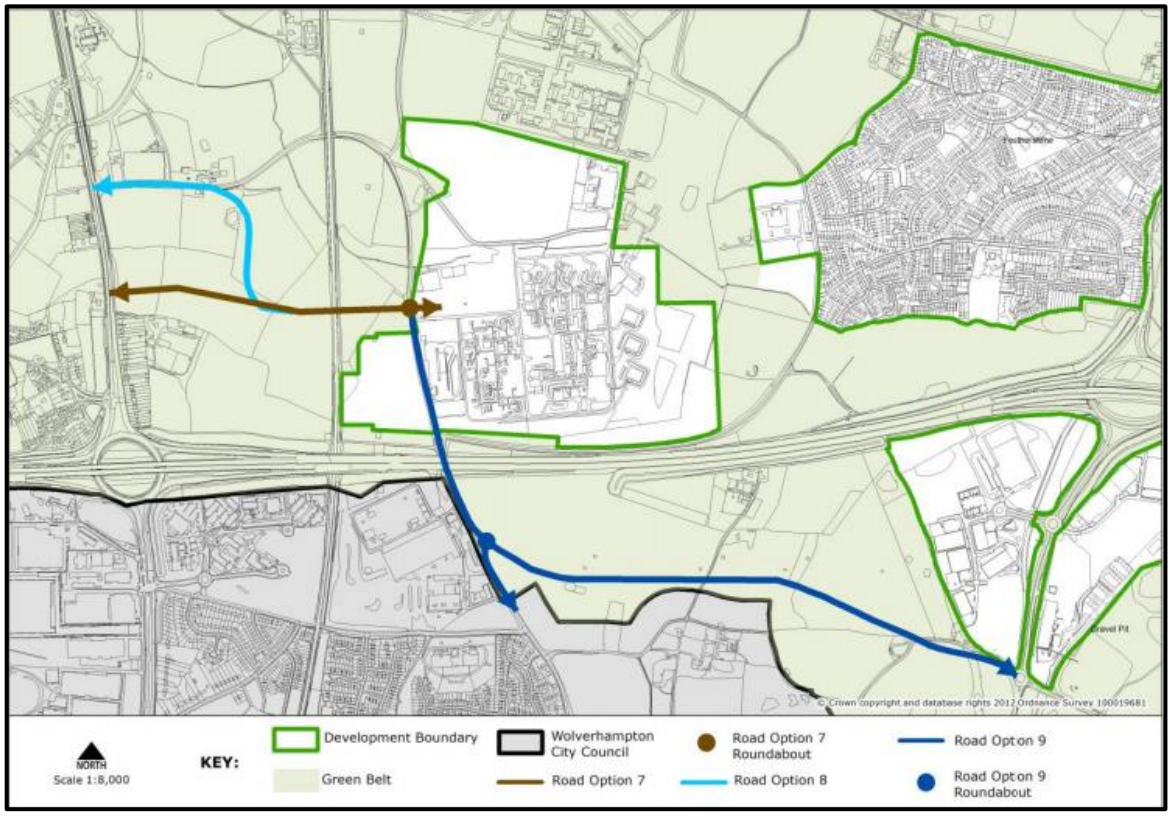


Figure 15 ROF Featherstone access options (South Staffordshire Council Draft Site Allocation Document)

Policy and Environmental Considerations

Land Use Policy

8.6.18 The site is situated entirely within the administrative boundary of South Staffordshire Council. The boundary with Wolverhampton City Council is located approximately 50m south of the site.

8.6.19 The majority of the potential development site identified by this ASA is designated as Green Belt land. The former Royal Ordnance Site (approximately 24ha) is allocated for employment use under Policies CP7 and EV1 of South Staffordshire's adopted Core Strategy (December 2012) and is excluded from the Green Belt designation. The site was identified for B1 and B2 employment use in both the Local Plan (1996) and the adopted Core Strategy (2012), subject to further studies being carried out. The site remains vacant and/or derelict and despite having policy support in the Local Plan, has not come forward for development.

8.6.20 In 2014, the Council commissioned an independent employment study of the site, the "ROF Featherstone Viability and Delivery Options Study", in order to understand why the site has not come forward.

8.6.21 South Staffordshire Council's emerging Site Allocation Document proposes to allocate 12ha of additional employment land at ROF Featherstone to meet Black Country and wider regional employment needs. In addition, the Site Allocation Document proposes a 2.8ha extension to the residential development at Featherstone, west of East Road.

8.6.22 The Site Allocation Document allocates the site for B1 (Business), B2 (Industrial) employment uses as well as B8 (warehousing). However, the ROF Featherstone Viability and Delivery Options Study explains that B8 warehousing is not a preferred use for the site, unless the new access solution emerges which avoids the existing residential areas.

8.6.23 The employment allocation is subject to a number of key development requirements, including:

- the implementation of a landscape buffer between the village of Featherstone and the ROF Featherstone employment site, in accordance with the ROF Masterplan (below); and

- the implementation of the highways access requirements.

Figure 16 Indicative Masterplan for ROF Featherstone (South Staffordshire Council Draft Site Allocation Document)

Landscape

8.6.24 The landscape character and sensitivities of the site vary. It is a generally enclosed landscape area with a mix of features and influences. It is relatively flat, with a slight fall from east to west. The western half of the site is characterised by pastoral farmland surrounded by road corridors, including the M54 motorway to the south and A449 to the west. The motorway is effectively screened from the site by a mature wooded embankment. A stream and the WCML cross the farmland in the western half of the site. This half of the site is recognised in the South Staffordshire Landscape Sensitivity Assessment for Employment Allocations (December 2015) (SSLSA) as being a well maintained parcel of farmland, with a strong rural character and of High/ Medium Landscape Sensitivity (parcels RFE01 and RFE02).

8.6.25 The eastern half of the site includes some smaller areas of farmland, areas of rough grassland and MOD bunkers and some scattered scrubby woodland and pine plantations. This half of the site is less cohesive and intact with areas of varying sensitivity. The SSLSA recognises this and defines these areas as being of Medium or Medium/ Low Landscape Sensitivity (parcels RFE03 – RFE05).

8.6.26 The site also includes a former WWII ammunition factory towards its centre. This area was not assessed by the SSLSA, yet is of a relatively lower sensitivity than the pastoral farmland in the west of the site.

8.6.27 Sensitive visual receptors include settlements and residential properties adjacent to the western (Coven Heath) and eastern (Featherstone) site boundaries and footpath users of Monarch Way (National Trail) that follows Brinsford Lane and Cat and Kittens Lane through the centre of the site.

8.6.28 Development of a SRFI on this site is likely to result in some notable and significant landscape and visual effects. These would include the direct loss of the rural pastoral farmland in the west of the site and inevitably many of the associated mature hedgerows and trees. The necessary landscape buffers would significantly reduce the amount of developable land on an already small and constrained site. This would further impact the ability to achieve a suitable SRFI layout.

8.6.29 Significant visual effects would be likely for residents in those properties immediately surrounding the site, primarily on its western and eastern edges and for users of Monarch's Way. However, the mature wooded embankment to the M54 motorway to the south would form a robust landscape 'buffer' and limit views and effects from south of the motorway.

Heritage

8.6.30 There are no Listed Buildings or Scheduled Monuments located on site. Approximately 150m to the south of the site, south of the M54, is the house and grounds of Moseley Old Hall, a Listed Building managed as a visitor attraction by the National Trust.

Air Quality and Noise

8.6.31 As stated above, the site is located immediately adjacent to residential receptors at Featherstone to the east, Coven Heath along the A449 to the west, along Brinsford Lane which forms the north western boundary of the site and to the north of the site along East Road. A number of residential properties along the A449 to the west are located adjacent to the site.

8.6.32 Defra online maps do not show the site to be located in an Air Quality Management Area (AQMA), however, the area immediately to the south of the M54 (approximately 50m from the site) is part of the Wolverhampton AQMA, designated for Nitrogen Dioxide (NO2) and Particulate Matter (PM10).

8.6.33 As explained above, the potential SRFI layout could result in noise impacts and extensive mitigation measures may be required to protect prevailing amenity.

Ecology

8.6.34 There are no international, national or locally/non-statutory designated sites located on or adjacent to the site. Despite the site's former industrial uses, habitats on site could support protected species and the existing farmland to the west of the site provides wildlife value at the local scale.

Hydrology / Flood Risk

8.6.35 EA detailed river network data shows an unnamed watercourse on site, which enters the site at the eastern boundary south of Featherstone, runs east to west across the site and leaves the site at the north eastern boundary on Brinsford Lane. The eastern part of the watercourse is defined as a secondary river, and the western part, west of Cat and Kittens Lane, as a primary river. A second watercourse, defined as a tertiary river, enters the site via a culvert beneath the M54 at the site's southern boundary, and discharges to the above mentioned watercourse on site.

8.6.36 EA mapping shows part of the site around the western reaches of the watercourse described above to be affected by fluvial flood risk, corresponding to High Risk, or Flood Zone 3.

8.6.37 EA mapping shows localised parts of the site associated with the above described watercourses to be at risk of surface water flooding.

Conclusion

8.6.38 The 36ha employment allocation at the ROF Featherstone site (24ha of B1/B2 Uses allocated by the Core Strategy and 12ha B1/B2/B8 Uses extension proposed by the emerging Site Allocations Document) is not large enough to accommodate a SRFI development. Therefore, the development of this site for a SRFI would need to look beyond the site allocation, into the Green Belt and the development of a SRFI in this location would undermined the industrial policy designation and not allow the site to meet the recognised needs of the Black Country. However, even if a much larger development area is considered, the difficulties in achieving rail access undermine the site's suitability and the close proximity of a relatively large numbers of residential properties represents a significant constraint to the successful operation of rail facilities. 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.

8.6.39 Furthermore, the site allocation (i.e. majority B1/B2 and a smaller element of B8) is required to meet the commercial and manufacturing needs identified in the Core Strategy and emerging Site Allocations Document. Therefore, the provision of large scale B8 and the extinguishment of the B1/B2 allocation would not be considered appropriate.

8.6.40 In addition, there are numerous identified highways access constraints in the surrounding area that significantly restrict accessibility of the site for all vehicle types. Suitable access is subject to the provision of substantial highways improvements, which is likely to include the delivery of a new road to the south of the M54, potentially through National Trust Land. Funding constraints for these improvements are uncertain and inextricably link to the B1/B2 employment allocation.

8.6.41 On this basis, ROF Featherstone is not considered to represent a SRFI development opportunity.

8.7 Short-List Site 2: Rugeley Power Station

Introduction

8.7.1 A plan of the Rugeley Power Station Site is included at **Appendix 4**. The Rugeley Power Station site is the former location of two coal-fired power stations situated approximately 15km south east of Stafford in the residential town of Rugeley. The first power station on the site, Rugeley A, was opened in 1961 and has since been closed and demolished. Rugeley B was commissioned in 1970 and closed in June 2016.

8.7.2 The brownfield site can be divided into two areas, the former power station which comprise the majority of the site, and a golf course, which is located to the north of a railway line, between the power station and the River Trent.

8.7.3 The site is located approximately 1km to the east of Rugeley Town Centre and adjacent to the A51. The A51 and A460 provide a south western connection to the A5 and M6 Toll which are situated approximately 14km south-west of the site.

8.7.4 The western portion of the site lies within the administrative boundary of Cannock Chase District Council, and the eastern portion of the site is within the administration of Lichfield District Council.

8.7.5 A branch of the Chase Mineral railway which allows one-way access into the site is located to the north of the site, and previously served the power station. The railway branch connects to the Chase/ Walsall Line, which is located to the north west of the site. The main, high speed WCML is located approximately 200m to the north of the site and connects to the Chase railway at Rugeley Trent Valley station, approximately 1km north-west.

8.7.6 The land to the north of the site and the River Trent is predominately in agricultural use, whilst the land immediately to the south comprises industrial and commercial uses, including warehouses and distribution centres, with residential properties beyond. Residential properties are also present immediately to the south east of the site, within Rugeley town centre, 100m to the west and within the villages of Armitage and Mavesyn Ridware, approximately 1km to the east.

Figure 17 Aerial Photograph of Rugeley Power Station site

Size/Capacity

8.7.7 The site is approximately 150ha. Decommissioning and demolition of the power station and removal of the associated facilities and plant would be required, as well as removal of the existing golf course. As such, there are on-site constraints that would add to the costs of bringing the site forward. However, it has been assumed that these are not sufficient to prevent a SRFI development progressing.

Topography

8.7.8 The site is relatively level, with the exception of localised heaps and mounds associated with the site's former industrial use, and soft landscaping associated with the golf course. The railway in the northern part of the site is situated on an embankment.

Rail connectivity

8.7.9 The site has an existing main line connection (the Walsall-Rugeley 'Chase Line, W10 gauge and recently electrified) and recent rail use, with sufficient land on site to accommodate a freight terminal.

8.7.10 The current rail access is not optimal and has operational constraints, with trains of W8 gauge or more coming to and from the south having to change direction twice (at Stafford or Crewe and then again off the branch line into the site). In addition, all trains on and off the WCML would have to head south from Crewe or Stafford and then cross the 4 main line tracks ahead of taking the route onto the branch line at Rugeley North Junction. It is unlikely on this busy stretch of the main WCML that Network Rail would countenance significant numbers of 775m length trains being routed to and from the site in this way. To overcome this constraint, a new main line connection would be required, but any connection directly into the 4-track main line would be likely to require full grade-separation as the "Slow" lines over which freight trains travel are on either side of the 4-track section. It is not known whether Network Rail would accept new connection(s) at this point, nor the impact that the costs of any grade-separated access would have on viability.

Road Connectivity

8.7.11 The site's main access is currently provided by a priority controlled roundabout with the A51, a single carriageway with a north south orientation in the vicinity of the former Power Station.

8.7.12 The Table below sets out the nearest strategic roads in the vicinity of the site and a brief route description.

Strategic Road Network	Distance from Site	Route to access Strategic Road Network	Undesirable characteristics
A5	14km	Route 1 – A51, Station Drive, B5013, A460	Residential direct frontage, Amenity Frontage, Pedestrian Crossing, School Frontage.
M6 Toll	14km	Route 1 - A51, Station Drive, B5013, A460 Route 2 – A51, Stafford Road, Western Bypass, The Friary, Birmingham Road	Residential direct frontage, Amenity Frontage, Pedestrian Crossing, School Frontage.
M6 J13	17 km	Route 3 – A51, A513, Brocton Road, Teddesley Road, Bendnall Road, Mill Lane, A449	Residential direct frontage.
A38	15km	Route 2 – A51, Stafford Road, Western Bypass, The Friary, Birmingham Road, Shortbutts Lane, London Road	Residential direct frontage, Ped Crossing.

8.7.13 The A5 and M6 Toll are the closest connections to the strategic road network and and situated approximately 14km south west of the site. The A51 and A460 provide a south western route towards these connections on the strategic road network.

8.7.14 Route 1 initially progresses north to the A51 / Station Road Roundabout situated approximately 1km to the north of the site, where the route then advances south west through Rugeley onto the A460. The A460 passes the large residential areas of Hednesford, Cannock and Stoney Lea while passing through a large industrial estate situated in Cannock. The section of route travelling through Rugeley passes a large number of direct frontage residential dwellings as well as the section of A460 travelling through Hednesford. The A5 and M6 Toll are situated at the southern end of the A460 and accessible via a series of priority controlled roundabouts.

8.7.15 The M6 Toll and the A5 can also be accessed approximately 15km to the south of the site via Route 2. Route 2 progresses south on the A51 though the small residential areas of Longdon and onto Lichfield via Stafford Road. The route then continues south though Lichfield via the Western Bypass/The Friary priority controlled roundabout towards Birmingham Road. Birmingham Road then provides access to A5 Wall Bypass and M6 Toll at its southern end. This route passes a number of direct frontage dwellings situated on the A51, particularly through Litchfield, as well as several priority controlled T-Junctions serving rural residential roads.

8.7.16 The M6 Junction 13 is located approximately 17 km east of the sites access via Route 3. Route 3 progresses north on the A51 towards the A513 passing the residential area of Milford. The route then proceeds south on the A513/Brocton Road mini roundabout following Brocton Road, Teddesley Road and Bednall Road passing through the residential areas of Brocton and Acton Trussell. The route then proceeds north on Mill lane onto the A449 where M6 Junction 13 can be accessed. This route passes a large number of direct frontage residential dwellings within Brocton and Acton Trussell.

Policy and Environmental Considerations

Land Use Policy

8.7.17 As stated above, the western portion of the site lies within the administrative boundary of Cannock Chase District Council, and the eastern portion of the site is within the administration of Lichfield District Council.

8.7.18 The site is not designated as Green belt land.

8.7.19 Lichfield District Council has adopted the Rugeley Power Station Development Brief Supplementary Planning Document on 20 February 2018. The document has been produced jointly with Cannock Chase District Council to guide the future redevelopment of the site. The SPD solely relates the Rugeley Power Station site and aims to assist with the delivery of Lichfield District Council's Local Plan Strategy Core Policy 1, particularly delivery of 10,030 dwellings over the plan period to 2029.

8.7.20 The SPD sets out a number of Development Principles which are intended to guide the future redevelopment of the site.

8.7.21 The SPD states that residential development will be the principle land use for the site and that the site has capacity for a minimum of 800 new dwellings. In addition, the site is considered suitable to accommodate significant new economic development and that the existing rail sidings could be a significant asset depending on the potential end users. However, the scale and quantum of employment floorspace is not provided and would be subject of a more detailed market assessment at the planning application stage.

8.7.22 On this basis, whilst the site is not yet formally designated for residential use, it is being considered for contributions to meeting the future housing needs of both Councils. 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.

Landscape

8.7.23 The site lies along the boundary of two of Natural England's National Character Areas (NCA); NCA 67 Cannock Chase and Cank Wood and 68: Needwood and South Derbyshire Claylands. To the south of the site lies the Cannock Chase and Cank Wood NCA and to the north lies the Needwood and South Derbyshire Claylands NCA.

8.7.24 No landscape designations have been identified within the site. The Cannock Chase Area of Outstanding Natural Beauty (AONB) lies approximately 1.5km to the south west of the site on the opposite side of Rugeley.

8.7.25 The character of the site landscape is currently dominated by the power stations cooling towers and associated buildings and structures. On this basis, development of a SRFI on this site is likely to result in varying landscape and visual effects. Replacing the existing power station with a SRFI would result in a change to the character and use of the site landscape, albeit that it would be a change from a large scale industrial use to a large-scale employment use. However, a SRFI is unlikely to dominate the landscape to the same degree as the existing power station. Some established woodland areas, trees and other habitats would be removed or disturbed to facilitate demolition of the power station and construction of the development and this would give rise to some adverse effects upon more localised landscape features.

Heritage

8.7.26 There are no designated heritage assets on the site. There are a number of Listed Buildings and Conservation Areas within close vicinity of the site, including the

Trent and Mersey canal situated to the south of the site, and the area surrounding Market Street within the centre of Rugeley. There are also a number of listed buildings in the wider area, but the configuration of the landform does not suggest that significant adverse impacts will result from development of this site.

Air Quality and Noise

8.7.27 The site is situated in close proximity to a number of residential receptors including a nursing home and residential properties within Rugeley town. The site is not directly connected to the motorway network, so a large-scale distribution use may result in significant traffic effects and therefore noise and air quality effects on local roads extending to some distance from the site.

Ecology

8.7.28 There are no international, national or locally/non-statutory designated sites located on or adjacent to the site. The majority of the site comprises the former power station, dominated by hardstanding with some limited degree of wildlife value presented by the water bodies and linear belts of trees. The areas of waste ground to the eastern end of the power station site may offer some value for invertebrates and birds. The golf course area to the north also presents some limited value for wildlife for its trees and grassland habitats. Derelict buildings at the site may host roosting bats and/or nesting birds.

8.7.29 The neighbouring watercourses on site are primarily culverted or heavily modified and as such are likely to be of little value for wildlife.

Hydrology / Flood Risk

8.7.30 EA detailed river network data shows a number of waterbodies on site. There are two watercourses within the site boundary, the River Trent, an EA main river, is located within the northern portion of the site and flows in a north-west to south-east direction.

8.7.31 The EA indicative flood map shows that the floodplain of the Trent extends into the site, with the majority of the northern area of the site located within Flood Zone 3, at high risk of flooding. Flood Zone 2 of the River Trent extends into the centre of the site close to the existing power station cooling towers.

8.7.32 Fluvial flood risk (from the Trent) may present a significant constraint to the north of the railway, with almost all of this part of the site located within Flood Zone 3.

This represents a relatively small proportion of the overall site area, but presents the most suitable location for a potential rail terminal. A single ordinary watercourse (Brereton Brook) crosses the site which may be subject to requirements such as wayleaves, water quality and ecological constraints. Brereton Brook is canalised and heavily modified and therefore more of an opportunity rather than a constraint (to improve its quality and ecological value). The surface water hydrology at the site is complex owing to its former use and subsequent demolition, but it is expected that any issues with surface water runoff could be resolved through drainage design.

Conclusion

8.7.33 In principle, the site is of suitable scale and topography for development as a SRFI capable of accepting 775m length trains. However, providing quality rail and road connectivity appears particularly constrained, complex and expensive. The quality of the main road access decreases further from the site on the routes towards the strategic road network. Furthermore, all routes to the strategic road network have direct residential frontage and pass through several built-up areas further reducing the suitability of the site. Therefore, the transport analysis has outlined that the Rugeley Power Station Site can be confidently dismissed on highways terms.

8.7.34 Furthermore, the site is being promoted for residential led development and may be relied upon to contribute to meeting the future housing needs of Cannock Chase and Lichfield Councils.

8.7.35 On this basis, the site is not considered to represent a suitable or appropriate alternative.

8.8 Short List Site 3: Dunston

Introduction

8.8.1 A plan of the Dunston Site is included at **Appendix 4**. This site was identified through the map search but it is not promoted or identified by any regional or local policies documents for employment or any other specific development. The site comprises a relatively unbroken stretch of countryside situated between the villages of Coppenhall, Dunston and Dunston Heath on the southern outskirts of Stafford. The WCML is located immediately to the east of the site.

8.8.2 The site could potentially be connected to the M6 by the A449/Junction 13 via access points off School Lane, via a new access road to the A449, and potentially to Chase View Lane to the north.

8.8.3 The site lies adjacent to the boundary between South Staffordshire Council and Stafford Borough Council, with the boundary corresponding to Chase View Lane on the northern boundary of the site.

8.8.4 The site has a strongly rural setting particularly to the west and is occupied by a mix of pastoral and arable farmland, comprising mostly small arable fields bound by hedgerows, trees and small lanes. Pothooks Brook flows through the eastern side of the site from south to north. The western part of the site commands expansive views of open countryside and Cannock Chase to the east.

8.8.5 The site is located immediately adjacent to residential receptors including small rural houses and farms within and adjacent to the site. The villages of Coppenhall (290m north-west), Hyde Lea (580m north), Dunston (200m east) and Dunston Heath (approx. 500m south) surround the site. A cluster of residential properties located to the west of Dunston on School Lane are located on-site.

8.8.6 A school, St Leonards First School is located approximately 250m east of the site off School Lane, Dunston.

8.8.7 There are several residential properties situated along the sites main link with the M6 motorway (A449), at Dunston.

Figure 18 Aerial Photograph of the area within which the 'Dunston Site' would be located

Size/Capacity

8.8.8 The site assumed for Dunston in this ASA is approximately 225ha. The site is open countryside and demolition of some existing buildings would likely be required and it is assumed that the existing watercourse will need be redirected/culverted to accommodate a SRFI on the site.

Topography

8.8.9 The site's landscape is undulating and generally sloping upwards from east to west, rising substantially to a high point of circa 100m above ordnance datum (AOD) at Coppenhall. The site would have to be substantially re-profiled and regraded in order to accommodate a SRFI development, necessitating the creation of large platforms for the rail sidings and warehouses.

Rail connectivity

8.8.10 The site has the potential for over 2km of frontage onto a suitable main line (WCML branch via Penkridge, W10 gauge and electrified) and thus is able in principle to accommodate main line access from either direction of travel and on-site stabling / handling sidings running parallel with the main line. Two intermediate overbridges may need to be closed or repositioned to make room for the sidings. As no main line connection has ever existed into the site, new connections would be required. The site topography may impose significant difficulty in allowing an efficient and operational relationship between any rail siting and the rest of the site.

Road Connectivity

8.8.11 This site is located immediately south and west of M6 Junction 13, off the A449. In this location, the A449 is a single carriageway under the control of Staffordshire County Council as Local Highway Authority. The village of Dunston is approximately 500m south of M6 Junction 13.

8.8.12 The Table below sets out the nearest strategic roads in the vicinity of the site and a brief access route description.

Strategic Road Network	Distance from Site	Route to access Strategic Road Network	Undesirable characteristics
M6 J13	2 km	Route 1 –A449 Northbound	Residential direct frontage.
A5	7km	Route 2 – A449 Southbound	Residential direct frontage.

8.8.13 Access to a SRFI could be taken from the A449 north of the village of Dunston. Some earthworks would be required to construct an access in this location due to the level difference between the road and the site. The A449 south of the site is a single carriageway with many direct accesses from residential, commercial and educational properties and passes through the town of Penkridge before reaching the Gailey Roundabout and the SRN approximately 7.5km away. It would not be desirable to promote this route as suitable for SRFI traffic.

8.8.14 The possible site layout requires reception sidings to pass under School Lane and this would result in the reconstruction of the School Lane railway bridge. School Lane would then be used as an emergency only access.

8.8.15 It can be concluded that a SRFI at this location may be possible from a traffic perspective if the primary access is taken from the A449 north of Dunston and is a suitable distance from M6 Junction 13.

Policy and Environmental Considerations

Land Use Policy

8.8.16 The site is located entirely within the administrative boundary of South Staffordshire Council.

8.8.17 The site is not designated as Green Belt land but it is designated as Open Countryside in the South Staffordshire Core Strategy. South Staffordshire's Core Strategy Policy OC1 requires that open countryside is protected for its own sake, particularly for its landscape, areas of ecological, historic, archaeological and recreational value. The South Staffordshire Green Belt and Open Countryside Supplementary Planning Document (November 2013) states that "due to the important character of this landscape, the Council will retain this character by ensuring that development remains sympathetic to its setting and therefore development is restricted" (paragraph 1.14). Therefore, at a local policy level, this site is afforded significant policy protection against large scale development, albeit, not as significant as the protection of the Green Belt.

Landscape

8.8.18 The site landscape is characterised and dominated by open medium scale farmland. It is relatively low lying with steadily rising ground to the west and beyond the motorway to the east. It is a rural landscape, albeit with some influences from the M6 motorway, WCML and employment development at Junction 13, east of the motorway.

Figure 19 Aerial Photograph viewing west across the Dunston Site

8.8.19 The site forms part of an open and largely cohesive rural landscape that connects with and encompasses further open farmland stretching beyond the site, notably to the west, north and south west. There is also intervisibility between the site and the countryside to the east and the Cannock Chase AONB. There is limited existing woodland or trees within or immediately surrounding the site which reflects its openness. Most mature trees are located in short lines or groups either associated with the watercourse extending through the site or within the field hedgerows.

8.8.20 The site is located close to a series of sensitive visual receptors, including a network of Public Rights of Way (PROW) both within the site and close to the west north and east. The small settlements of Coppenhall and Dunston both lie close to

the north west and east of the site and residential properties (and a primary school at Dunston) within these settlements have open views across the majority of the site. Views of the site are also possible from a number of other scattered farming properties and country lanes in the immediate vicinity. In many of these views the site is seen almost in its entirety as open farmland, with little if any visual screening, filtering or interruption.

8.8.21 From the rising land on the western side of the site there are expansive views that encompass open countryside and the Cannock Chase AONB. In these views, the site dominates the foreground.

8.8.22 Development of a SRFI on this site would be likely to result in many notable and significant landscape and visual impacts. As an existing open rural landscape that is visually cohesive and well connected with its broader landscape context, a development of this size and scale would be very difficult to successfully assimilate or mitigate in landscape and visual terms.

8.8.23 There are very limited existing woodlands, substantive tree belts or other landscape features or landform variations within or surrounding the site that could assist in integrating and mitigating a SRFI development. The resultant effects upon landscape character are likely to stretch over a broad area, including landscapes to the west, south and east of the site.

8.8.24 Significant visual effects are likely to be experienced by residents at Coppenhall and Dunston (including the Primary School) and for users of long stretches of PROW both within and surrounding the site. The development would also be visible from the Cannock Chase AONB to the east of the site and in these views, it is likely to be seen as a dominant element in a characteristically more open and rural landscape to the south of Stafford.

Heritage

8.8.25 There are no Listed Buildings or Scheduled Monuments located on site.

8.8.26 There are four Listed Buildings at Dunston, The Grade II Listed Church of St Leonard (360m east), the Grade II Listed Dunston Farmhouse (340m east), a Grade II listed former stable block at Dunston Hall (370m east), and Grade II Listed Dunston House (381m east). Grade II Listed 'The Toft' is located 1km west of the site and The Grade II* Listed Church of St Lawrence is located at Coppenhall

(680m west). As well as the presence of several Scheduled Monuments within the vicinity of the site.

8.8.27 The majority of the site is previously undeveloped, and therefore may host previously undiscovered archaeological remains.

Air Quality and Noise

8.8.28 The site is situated close to residential receptors at Dunston, Dunston Heath, Coppenhall and Hyde Lea, as well as various farms near the site. The site is not located within or close to an AQMA. Development of the site as a SRFI could increase noise levels at receptors to the west of the site, and may increase air pollution for those receptors already affected by the M6 and WCML in the east.

Ecology

8.8.29 There are no international or national designated sites located on or adjacent to the site. However, the site is rural, previously undeveloped and hosts a number of potential habitats of value for wildlife, including habitat suitable for a range of protected species and potential UK BAP priority habitats. The scale of constraint from ecology is assessed as Moderate as there is the potential for onerous mitigation to offset loss of biodiversity or to mitigate impacts to protected species which could be present on site.

Hydrology / Flood Risk

8.8.30 Pothooks Brook flows through the eastern side of the site from south to north. The brook rises between Dunston Heath and Levedale, approximately 1.5km south-west of the site. EA detailed river network data shows three watercourses crossing the site from west to east and discharging to Pothooks Brook. All three of these watercourses are partially culverted on-site. Aerial photography and the EA surface water maps suggest that the southernmost two watercourses may, during flood events, flow across the arable field to Pothooks Brook. Pothooks Brook effectively separates the WCML in the east from the majority of the site area in the west, which would necessitate a new crossing or culvert. A new crossing could affect upstream flood risk and could affect water quality and biodiversity. As the land adjacent to the Brook is relatively flat and the railway line close to ground level, there could be difficulties in constructing a crossing to reduce the physical impacts of the railway terminal on the watercourse.

8.8.31 The fluvial floodplain, corresponding to Flood Zone 3, associated with the Pothooks Brook extends over a relatively narrow corridor throughout the length of the watercourse on site. The floodplain, affects the existing residential properties at the site on School Lane, Dunston. The topography in the western part of the site is such that the majority of land on the western side is out of the fluvial floodplain.

8.8.32 EA surface water flood maps show areas of low to high surface water or fluvial flood risk on site, associated primarily with the watercourses described above. The maps also suggest the existence of a further two or three possibly ephemeral watercourses in the northern part of the site, along the site boundary with Chase View Lane and to the east of Upper Wheats Farm.

8.8.33 British Geological Survey groundwater flood maps show the majority of the site west of Pothooks Brook to be at risk of groundwater flooding at the surface.

8.8.34 On this basis, the scale of constraint from hydrology and flood risk is assessed as Moderate. It is likely that the regulatory authority would have concerns about the potential culverting of Pothooks Brook for any great length, which would present a significant spatial constraint to the rail terminal connection. Addressing flooding issues whilst creating level development platforms that relate to the rail line would be challenging.

Conclusion

8.8.35 The site is in multiple ownership and is not being promoted for employment development. Significant land assembly would be required to achieve a suitable sized development site.

8.8.36 The site is entirely undeveloped and has a strongly rural character despite its location on the edge of the Stafford conurbation. Whilst located outside of the Green Belt, the site is designated Open Countryside and forms part of an open and largely cohesive rural landscape that connects with and encompasses further open farmland stretching beyond the site. The site is protected by local planning policy for its own sake and development of a SRFI on this site would be likely to result in notable and significant landscape and visual impacts. As an existing open rural landscape that is visually cohesive and well connected with its broader landscape context, a development of this size and scale would be very difficult to successfully assimilate or mitigate in landscape and visual terms.

8.8.37 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, make the site unsuitable and is not considered to be an acceptable location for a SRFI.

8.8.38 Changes to the site size and illustrative layout have been considered, however, this site remains fundamentally unsuitable for large scale commercial development. The principle concerns outlined above, especially impact on landscape, would remain for any form of development of the scale and nature of a SRFI. On this basis, this site is considered to be fundamentally unsuitable.

8.9 Short List Site 4: Creswell

Introduction

8.9.1 A plan of the Creswell Site is included at **Appendix 4**. The site comprises agricultural land between M6 Junction 14 and the village of Great Bridgeford, on the northern outskirts of Stafford, located within the administrative boundary of Stafford Borough Council.

8.9.2 The site would potentially connect to the M6 via the A5013 to Junction 14, located immediately adjacent to the site, and is located immediately adjacent to the WCML which forms the site's southwestern boundary. The railway at this location is situated on an artificial embankment to raise the railway line out of the floodplain.

8.9.3 The site is split in half by the A5013 Creswell Grove. To the south of the road the site is dominated by the River Sow and its floodplain. To the north the site is situated on higher ground between the A5013 and the M6.

8.9.4 There are some industrial land uses to the east of the site including distribution and industrial facilities within Redhill Business Park and Prime Point Business Park. To the north, east and west land uses are mainly agricultural.

8.9.5 An enclave of the site boundary to the south is occupied by residential properties along Creswell Grove, The Mount (residential), and by woodland and vacant development land between the River Sow and the M6.

Size/Capacity

8.9.6 The assumed site is approximately 280ha.

Topography

8.9.7 Topographically, the site falls from a high point of around 110m AOD on the north-eastern boundary, towards the River Sow in the south west at below 75m AOD, corresponding to a 35m fall across the site. The River Sow floodplain, occupying the south western half of the site is relatively level. The level difference across the site is a major constraint.

Rail connectivity

8.9.8 The site has over 2.5km of frontage onto a suitable main line (WCML, W10 gauge and electrified) and thus could be able in principle to accommodate main line access from either direction of travel and on-site stabling / handling sidings running parallel with the main line. Two intermediate overbridges might need to be closed or repositioned to make room for the sidings. As no main line connection has ever existed into the site, new connections would be required. Any new connections into the 4-track main line would be likely to require full grade-separation as the "Slow" lines over which freight trains travel are on the opposite side of the main line to the site. It is not known whether Network Rail would accept new connection(s) at this point, nor the impact that the costs of any grade-separated access would have on viability.

8.9.9 Topography and flood areas along the rivers will require significant raising of the development platform in order to bring the levels up to an acceptable gradient to the WCML and bring the terminal or reception sidings out of the flood zone.

Road Connectivity

8.9.10 This site is located immediately north of M6 Junction 14, adjacent to the M6. This site would be accessed off the A5013. The A5013 in this location is a single carriageway.

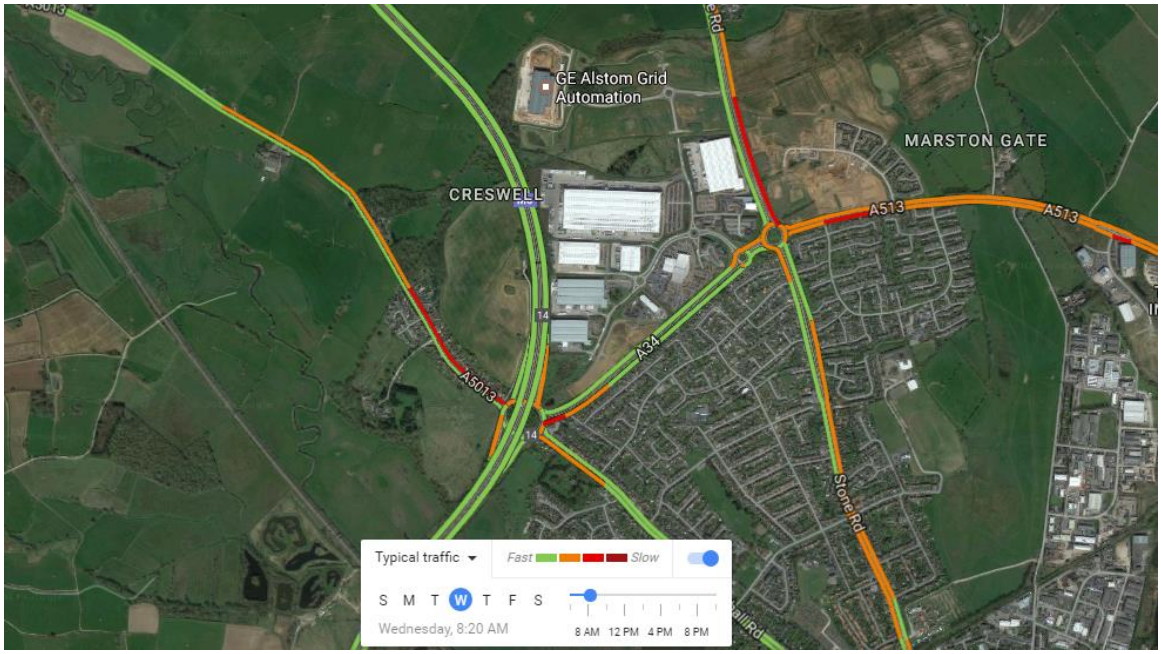
8.9.11 The Table below sets out the nearest strategic roads in the vicinity of the site and a brief route description.

Strategic Road Network	Distance from Site	Route to access Strategic Road Network	Undesirable characteristics
M6 J14	1km	Route 1 –A5013	Residential direct frontage.

8.9.12 All SRFI traffic at a site in this location would use the A5013 in order to reach M6 Junction 14. There are no significant destinations west of the site therefore all HGV traffic would head to the M6. On the approach to the M6 Junction 14 there is a group of approximately 50 houses with frontages onto the A5013.

8.9.13 The location of the site though close to Stafford is more remote from the principal urban concentrations such as Wolverhampton, Birmingham and Walsall. Therefore, employees from these conurbations would potentially have to travel further than at WMI, Dunston or Featherstone. HGV destinations are also likely to be less well served from this location, which is close to the boundary of the search area.

8.9.14 M6 Junction 14 is currently a partially signalised gyratory with the motorway off slips subject to signal control. The A5013 arm of M6 J14 is currently subject to congestion in the AM peak (see Figure below). Therefore, if greater demand is required of this junction, and this arm in particular, potential mitigation measures will need to be considered. This would be likely to require full signalisation of the M6 Junction 14.



8.9.15 Consequently, a SRFI at this location may be possible in terms of achieving appropriate access to the highway network; however, it would result in an impact to residential properties on the access routes and may require significant road improvements.

Policy and Environmental Considerations

Landscape

8.9.16 The site's landscape is characterised by undulating pasture farmland and a distinctive open stretch of the River Sow. It is an attractive rural landscape that includes the meandering River Sow to the south west and more open and elevated farmland to the north. North of the A5013, the land rises noticeably to a high point of over 110 m AOD. South of the road the landform is dominated by the pastoral valley floor of the River Sow.

8.9.17 The landform throughout the site is generally varied with land levels varying by over 35 metres. Localised variations and interruptions in the landform, particularly across the landscape to the south of the A5013 and along the course of the River Sow add to its landscape character and interest.

8.9.18 Woodland and tree cover within the site is generally limited, although there are a number of nearby woodlands to the south and south west.

8.9.19 Settlement areas lie adjoining the site to the south (Creswell) and north (Great Bridgeford) along the A5013.

8.9.20 A number of sensitive visual receptors lie within or in close proximity to this site. These include the adjoining settlement areas and a small number of other scattered surrounding properties and PROW within and close to the west of the site. The A5013 through the centre of the site also affords open clear views for road users.

8.9.21 Development of a SRFI on this site is likely to result in many notable and significant landscape and visual impacts. The meandering River Sow and the open and distinctive landscape associated with this stretch of its course would be radically altered. Similarly, the open rural character of the undulating and steepening pasture farmland to the east and north east of the valley floor would undergo significant change. The open pastoral character of the existing landscape coupled with the existing positive influence of the River Sow further exacerbate the likely sensitivity of the impact upon this landscape.

8.9.22 Development within the higher eastern half of the site is likely to be widely visible over an extensive area in all directions. Despite there being an existing employment area to the north east of Junction 14 this is largely visually separated from the site by changes in the landform and the presence of intervening mature woodland. Significant visual effects would be likely for residents of the settlement areas immediately to the south and north of the site and other surrounding properties and for users of the PROW within and to the west of the site.

Heritage

8.9.23 Located towards the south centre of the site Creswell Chapel/“Parish Church remains” is a Scheduled Monument and Grade II listed building.

8.9.24 Bridgeford Bridge, which forms part of the western boundary of the site is a Grade II Listed Building. There are two further Listed Buildings within Great Bridgeford, the Grade II listed ‘The Gables’ and ‘Bridgeford Hall’.

8.9.25 The Staffordshire County Council Historic Environment Record records the existence of a number of features on site including:

- Turnpike 25 dating to 1763 (HER number: 58516). The route of this road follows imprecisely that of the present day A5013. There is also a milestone on site relating to this road (HER number: 51342);

- A post medieval water meadow field system (HER number: 52115), located at grid reference SJ 8937 2604, towards the south centre of the site. The record notes that the recorded feature is part of a larger network of water meadow features within the Creswell Farm area;

- Creswell/Cressvale Saxon/medieval settlement (HER number: 02430), located close to the remaining Creswell Chapel towards the south centre of the site;

- Creswell Farm (HER number: 54259), a Georgian to industrial era farmstead and Outfarm (HER number: 54267), an industrial era farmstead, both located at the centre of the site off Creswell Grove;

- Former field boundary (HER number: 04581), located to the north of the A5013;

- Evidence of ridge and furrow field markings at a number of locations at the site; and

- A Bank/earthwork, possibly medieval, relating to a desk study of the M6 corridor in 1992 (HER number: 04579), and located to the north centre of the site.

8.9.26 In addition, there is a likelihood of undiscovered archaeological remains at the site. On this basis, the scale of constraint with regards to archaeology and cultural heritage at the site is considered to be Moderate to High.

Air Quality and Noise

8.9.27 The site is located in close proximity to a number of residential receptors, particularly those along Creswell Grove which could be affected by noise and air quality emissions from the site and associated traffic.

Ecology

8.9.28 The site is located approximately 50m (corresponding to the width of the M6 which marks the boundary) from Doxey and Tillington Marshes Site of Special Scientific Interest (SSSI). The SSSI covers an area of 123.9ha, extending into the centre of Stafford. The SSSI is designated for its wetland habitats which provide all year-round importance for birds, including a special significance for breeding snipe *Gallinago gallinago*, of which the population is the largest in Staffordshire. The SSSI is also noted as one of the largest areas of reed sweet-grass *Glyceria maxima* habitats in Staffordshire.

8.9.29 In addition to the adjacent SSSI, international and national designated sites for nature conservation within 5km of the site are summarised as follows:

- Astonfields Balancing Lakes LNR, 2.35km east;
- Kingsmead Marsh LNR, 2.9km south-east; and
- Kingston Pool Covert LNR, 4.4km east.

8.9.30 The site itself is rural and undeveloped and may have been used for traditional pastoral farming for much of its history. The site is located adjacent to and directly connected to by means of the River Sow, the Doxey and Tillington Marshes SSSI, and is likely to contain habitats that could be used by protected species for which this SSSI is designated, in particular for overwintering birds, otter and water vole. It is likely that the site is of importance for wildlife at a local to regional scale. The scale of constraint from ecology is assessed as High.

Hydrology / Flood Risk

8.9.31 The River Sow (Main River) flows through the site from north-west to south-east over a distance of approximately 4.2km. EA maps show that much of the river corridor, comprising the majority of land to the south west of the A5013 is at High risk of fluvial flooding (Flood Zone 3).

8.9.32 The entire site is located within the catchment of the River Sow. The EA Catchment Data Explorer defines the stretch of river on site as part of the River Sow - Brockton Brook to Doxey Brook.

8.9.33 EA mapping shows part of the site to be at low to high risk of surface water flooding, corresponding to the River Sow floodplain and to the three watercourses described above.

8.9.34 As a main river, the River Sow is managed by the EA. Other drains and watercourses on site may be managed by Stafford Borough Council, by the Sow and Penk Internal Drainage Board (IDB) or by landowners.

8.9.35 BGS groundwater flooding maps show the River Sow floodplain and to the east of Great Bridgeford to be at risk of surface groundwater flooding, comprising approximately half of the total site area.

8.9.36 The River Sow and its floodplain and associated watercourses present a significant potential constraint to the development of the site by means of flood risk, which could make a significant proportion of the site unsuitable for development, and as a physical obstacle located immediately adjacent to the WCML, the river and its floodplain isolates the railway from the remainder of the site. A significant engineering solution would be required to cross the river corridor, and this would increase the potential impact on the river and its associated features.

8.9.37 The following photograph was taken in January 2017 and demonstrates the recent flooding that has taken place on site.

Figure 20 Flooding at Creswell, January 2017

Conclusion

8.9.38 The constraints described above are likely to be increased once interactions between different environmental disciplines have been considered, such as the combined effects on the River Sow from hydrology and ecology, and the combined constraints from topography and the river corridor. Overall, the environmental constraints for the Creswell site are assessed as High.

8.9.39 Topography and flood area along the rivers would require significant raising of the development platform in order to bring the levels up to an acceptable gradient to the WCML and bring the terminal or reception sidings out of the flood zone. Therefore, development would be highly visible.

8.9.40 Access to the highway network would result in a significant impact on the existing adjacent settlements.

8.9.41 On this basis, this site is not considered to represent a suitable location for SRFI development.

8.10 Short List Site 5: West Midlands Interchange

Introduction

8.10.1 A full description of the WMI proposals and a detailed summary of the operating characteristics of the WMI scheme are provided in the DCO application material. The Environmental Impact Assessment (EIA) will provide as extensive appraisal of the likely environmental effects of the project. It is not intended to replicate this material in this section, but rather to provide an overview of the WMI project, consistent with the other sites on the short-list. This will allow fair comparisons between the alternative sites in terms of the key criteria for SRFI sites and the potential environmental impacts of bringing a site forward for a SRFI facility.

8.10.2 Within this context, the WMI site is approximately 10 kilometres to the north of Wolverhampton and immediately west of Junction 12 of the M6 in South Staffordshire. The site is entirely located within the administrative boundary of South Staffordshire Council.

8.10.3 The site is broadly bound by the A5 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 and Straight Mile to the south; and the A449 (Stafford Road), from the Gailey Roundabout to Station Drive to the west.

8.10.4 The Site comprises a mix of uses, features and influences that vary across the area. A large proportion of the land is under agricultural use with other notable areas of mineral workings in the east and woodland (Calf Heath Wood) towards the centre of the site. Existing residential properties are located along Croft Lane and the A5(T) around the northern part and boundary of the site, with further farming and residential properties positioned around or close to the site boundaries.

8.10.5 The existing Four Ashes Industrial Estate is located adjacent to the southern boundary of WMI and the Veolia Energy from Waste (ERF) Plant is also located south of the Site. A large chemical works (operated by SI Group (referred to as SI Works)) is located to the north of the industrial estate between the western and eastern sections of the Site and an area under construction as a storage and distribution development (known as the Bericote Development) lies close to these established uses but east of the canal.

8.10.6 The WMI site is currently characterised by a large area of sand and gravel mineral extraction within the east known as Calf Heath Quarry; a patchwork of agricultural fields with hedgerows and trees to the west and south of this and an area of mixed woodland known as Calf Heath Wood.

8.10.7 The Staffordshire and Worcestershire Canal runs roughly north to south through the western part of the site. The WCML runs north to south through the site, near the western edge.

Size/Capacity

8.10.8 The site is approximately 297ha. The current masterplan includes a full-length rail terminal located directly adjacent to the WCML and sufficient space for up to 743,200sqm of warehousing, as well as significant strategic landscaping and open space.

Topography

8.10.9 The topography of the site is relatively level, with localised topographical features associated with the canal cutting, railway and quarry workings.

Rail connectivity

8.10.10 The site has over 2km of frontage onto a suitable main line (WCML branch via Penkridge, W10 gauge and electrified) and thus able to accommodate main line access from either direction of travel and on-site stabling / handling sidings running parallel with the main line.

8.10.11 As part of the development of the WMI proposals, the Project Team have engaged with Network Rail to consider the engineering and operational aspects of the new SRFI in relation to the WCML. Network Rail expressed their in-principle support for the scheme as early as 2008. Network Rail previously provided a letter which supports the scheme in the context of the Governance for Railway Investment Projects ('GRIP') and a previous layout at the site achieved through to Stage 3 of Network Rail's 8-stage GRIP process, which supported the principle of a full rail connection to the Site to serve a SRFI.

8.10.12 An updated GRIP approval is currently in the process of being refreshed following some technical changes and improvements to the layouts.

Road Connectivity

8.10.13 The WMI site benefits from direct connections to the strategic highway network and access to Junction 12 of the M6 via the A5, just to the east of the site. The WMI site is located within a network of predominately strategic roads, providing good links to nearby towns and the wider UK.

8.10.14 The key road links in proximity to the Site include:

- M6 - located east of the Site and providing access to Birmingham, the West Midlands and the wider UK.
- A5 – forms the northern boundary to the Site and provides access to the M6 junction 12, Cannock (east), Telford and Shrewsbury (west).

- A449 – forms the western boundary to the Site and provides access to Stafford, Penkridge (north) and Wolverhampton (south).

- Vicarage Road – forms the southern boundary to the Site and provides local access to Four Ashes village and a secondary route to the AS & M6.

8.10.15 The Table below sets out the nearest strategic roads in the vicinity of the site and a brief route description.

Strategic Road Network	Distance from Site	Route to access Strategic Road Network	Undesirable Characteristics
A5	Direct Access	Northern Site Access	
M6 Toll	3.6km	Route 1 – A5, M6 Route 2 – Vicarage Road, A5, M6	Some residential direct frontage, Pedestrian Crossing (via Route 1).
A449	Direct Access	Western site Access	
M6 J12	<1km	Route 1 – A5 Route 2 – Vicarage Road, A5	Very limited residential direct frontage, Pedestrian Crossing.
M54 J2	5.0km	Route 6 – A449 Stafford Road	Residential direct frontage, Pedestrian Crossing.

8.10.16 The main access to the WMI site for vehicular traffic would be via the A5 and would be provided between Junction 12 of the M6 and the Gailey Roundabout. The other principal means of access will be onto the A449 for vehicles travelling to the M54 and Wolverhampton. There would be a secondary access from the site to Vicarage Road which would give access to the southern element of the site, provide an access for local employees and act as an alternative route to the M6. There would be restrictions on vehicles travelling west to Station Drive, which would be reinforced by the restricted headroom of the rail bridge.

8.10.17 With the choice of two trunk road accesses to the site there should be minimal use of other roads by HGVs. Similarly, most employees from the main urban areas would use these routes with the remainder using other roads, such as the A5 to the west and the A449 to the north.

8.10.18 On this basis, the WMI site is considered to have excellent road connectivity.

Policy and Environmental Considerations

Land Use Policy

8.10.19 The site is located entirely within the administrative boundary of South Staffordshire Council.

8.10.20 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. Paragraph 1.78 of the NPS is clear that infrastructure projects may comprise inappropriate development which is, by definition, harmful to the Green Belt and for which there is a presumption against development, except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt when considering any application for such development.

8.10.21 The WMI **Planning Statement** [Document 7.1] explains the existence of very special circumstances in this case. This includes the extreme shortage of large scale employment land suitable for distribution or other uses within the West Midlands and the fact that the West Midlands Green Belt boundaries are acknowledged to be out of date with a number of West Midlands authorities including South Staffordshire accepting that employment and housing needs cannot be met without long overdue Green Belt review, even for small scale development.

8.10.22 Whilst, these very special circumstances could equally apply to another suitable Green Belt site within the Search Area, the site assessments above have demonstrated that there are no other sites suitable for a SRFI development within the Search Area. Therefore, the 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 – and specifically at the WMI site.

Landscape

8.10.23 The WMI site comprises a mix of uses, features and influences that vary across the area. A large proportion of the land is under agricultural use with other notable areas of mineral workings in the east and woodland (Calf Heath Wood) towards the centre of the site. The existing Four Ashes Industrial Area lies outside the site in the south, contained between the railway and the canal. Existing residential properties are located along Croft Lane and the A5 around the northern part of the site, with a number of other farming and residential properties positioned around or close to the site boundaries. Further settlement and properties exist at Calf Heath close to the south-eastern corner of the site and along Vicarage Road, Straight Mile and Station Drive.

8.10.24 The agricultural land within the site is sub-divided by a network of hedgerows and hedgerow trees with other wooded copses located across the area. The Calf Heath Reservoir lies just beyond the north-east extent of the site and also alongside Junction 12 of the M6 motorway.

8.10.25 Public access to the site is limited. A single Public Right of Way exists in the north-west and provides a link between Croft Lane and the A449 via an overbridge to the railway. A towpath also extends along the western side of the canal for its length through the site. There is no public access to the large area of the site to the east of the canal or to Calf Heath Wood.

8.10.26 In the wider context of the site, the Cannock Chase Area of Outstanding Natural Beauty (AONB) lies approximately 3km to the east and Somerford Hall and Park lie to the south west of the site beyond the A449.

8.10.27 The character of the site is affected by a number of significant urban and industrial influences including the proximity of the M6, the SI chemical works, the Bericote development site, the existing Four Ashes Industrial Estate and the Veolia energy recovery facility.

8.10.28 Industrial areas to the east and south limit the site's wider visibility.

Figure 21 Aerial Photo viewing north east across the WMI site and surrounding industrial elements.

8.10.29 Nevertheless, it is anticipated that there would be landscape and visual effects upon the landscape character and features of the site (including the canal corridor and woodland, trees and hedgerows), upon the landscape character of the wider area and upon residents and users with views towards the site.

Heritage

8.10.30 Several historic features associated with the canal are located within or near the site. These comprise the canal itself, lock keeper's cottages including the Grade II Listed 18th century Round House located between two of the land parcels west of Gailey along the northern edge of the site. Adjacent to the Round House, Gailey Wharf is a Grade A locally listed building which includes a restored 18th century revolving crane.

8.10.31 The Canal itself is a Conservation Area and runs through the site.

8.10.32 Potential impacts upon the historic landscape character of the site and its immediate surrounding area will be an important consideration in the layout, landscaping and mitigation of any SRFI development.

Air Quality and Noise

8.10.33 Defra online maps do not show the site to be located in an Air Quality Management Area (AQMA). The closest AQMA to the site relates to a stretch of the A5, approximately 3.8km to the northeast, designated for Nitrogen Dioxide (NO2) from road sources. The site is located in close proximity to some residential receptors, including properties to the north of Vicarage Road, east of Croft Lane and south of the A5. There are further residential properties north of the A5, with the villages of: Coven, located 1.6km to the south-east; Brewood, located approximately 2.2km to the west; Penkridge, located 2.8km to the north; and Hatherton, located 3.4km to the east.

8.10.34 Noise and air quality sensitive receptors within the vicinity of the site comprise residential receptors as described above.

8.10.35 Despite the site's semi-rural context, there are a number of potential sources of noise on and within close proximity to the site, including Calf Heath Quarry, the A5, the WCML and the M6, the SI Group Chemical Works and the Four Ashes Industrial Estate. Parts of the site will therefore potentially experience elevated background levels for noise and vibration. The site is well connected to the major road network, with the M6 Junction 12 located immediately to the north-east of the site and connected to the site via the A5.

Ecology

8.10.36 There are no international or national designated sites for nature conservation located on or adjacent to the site. International and national designated sites within 5km of the site are summarised as follows:

- Four Ashes Pit SSSI – located 140m to the south and designated for its geological rather than ecological interest;
- Belvide Reservoir SSSI – located 4.2km to the west and designated due to the presence of Shoveler duck and breeding birds; and
- Big Hyde Rough SSSI – located 4.5km east and designated due to the presence of ancient woodland.

8.10.37 There are no Special Protection Areas (SPAs) or Ramsar Sites within 10km of the site. Mottey Meadows Special Area of Conservation (SAC) is located 7.5km to the north-west. Cannock Chase SAC is 7.4km to the north-east.

8.10.38 Mapping provided by Staffordshire Ecological Record shows there to be no locally designated/non-statutory sites for nature conservation on-site. There are some locally designated sites within the vicinity of the site, the closest of which are summarised as follows:

- Gailey Reservoirs Local Wildlife Site (LWS), located immediately to the north-east;
- Calf Heath Bridge (east of) Worcester Canal LWS, located 10m south;
- Somerford Wood LWS, located 50m west;
- Land at Four Ashes LWS, 75m south; and
- Watling Street Plantation LWS, 100 m east.

8.10.39 Without mitigation, there is the potential for development of the site to affect protected species, in particular if the development were to encroach significantly on the canal and woodland habitats. Large proportions of the site however are of limited value for wildlife including the quarry workings and open arable land. Based on the above it is likely that the site has importance for wildlife at the local scale only and that this should not be a significant constraint on development.

Hydrology / Flood Risk

8.10.40 There are numerous surface water features situated within close proximity of the Site. These include:

- River Penk, Saredon Brook (both defined as Main Rivers so managed by the EA) and tributaries;
- Calf Heath reservoir and Gailey reservoirs (canal feeder reservoirs with recreational use);
- Staffordshire and Worcestershire Canal and Hatherton Canal;

- Several ordinary watercourses, drainage ditches and land drains within and adjacent to the Site; and

- Several ponds located on and near to the Site.

8.10.41 According to the EA indicative flood maps, the Site is situated within Flood Zone 1, at less than a 0.1% (1 in 1000 annual probability of tidal/ fluvial flooding). However, the EA maps also show that some parts of the Site may be susceptible to surface water flooding in discreet areas. A small part of the northern boundary of the Site is shown to be at risk of reservoir flooding.

Conclusion

8.10.42 The WMI site is considered well suited and well located to meet the need for a large scale SRFI.

8.10.43 The site is of a sufficient size to accommodate a SRFI development and, importantly, it is large enough to achieve the critical mass required for success and to accommodate the significant landscape and open space improvements required to mitigate the visual impacts of the development and create a suitable 'buffer' between the development and the surrounds.

8.10.44 Therefore, the proposals at WMI offer the opportunity to create a SRFI development of national significance. The site is sufficiently large and flat, rail access to the site is achievable, and quick and efficient access to Junction 12 of the M6 is also achievable. Furthermore, development can be achieved avoiding significant environmental impacts.

8.10.45 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 and above, 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 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 sites for meeting the need for regional SRFIs are on Green Belt land (paragraph 5.172).

8.10.46 Comparisons with the other short-listed sites are therefore clear, with the WMI site performing well on all site assessment criteria, whilst none of the other short-listed sites are considered suitable for SRFI development.

9. Conclusions

9.1.1 This Alternative Site Assessment seeks to identify sites that have the characteristics to accommodate a SRFI development within an identified gap in the national network. It is evident that the key criteria for a SRFI facility, principally the need to efficiently link to both the national road and rail networks, greatly restricts the SRFI development opportunities. Whilst this assessment identified sites which have potential, it is clear that, apart from WMI, there are no sites within the Search Area which represent sincere and suitable locations for a SRFI development.

9.1.2 The defined search area adopted by this assessment has been informed by a number of factors, including the expectations of planning policy, meeting the recognised need, local environmental, infrastructure and other constraints and the proximity to existing and proposed facilities. This approach was adopted to ensure the widest reasonable search area for alternative SRFI sites. At every opportunity, this Assessment adopted a comprehensive and inclusive methodology, including creating an extensive search area, setting a low site size threshold of 60ha and considering sites which are up to (and, in two cases, beyond) 5km from the strategic road and rail network. The findings of this Assessment 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 WMI.

9.1.3 The WMI site is located adjacent to Junction 12 of the M6, a principal road for the transfer of freight within the UK. The site is also surrounded by the Strategic Road Network and the borders of the site are where the M6, the A5 trunk road and the A449 trunk road meet.

9.1.4 In terms of potential transport impacts, the WMI site performs much better than Creswell, Rugeley Power Station and ROF Featherstone, which each have difficult highways issues. These sites would require large scale highway improvements or reliance on existing routes to the strategic road network which pass through built up residential areas. In comparison, at WMI access to the M6 can be achieved in less than 850m and only passes a small number of residential properties, mostly set back from the A5.

9.1.5 Like all the short-list sites (apart from Rugeley Power Station), WMI is located adjacent to the West Coast Main Line branch via Penkridge. However,

Featherstone and Creswell have significant site constraints which would result in complex and unsuitable rail connections.

9.1.6 The WMI site, therefore, represents a strong location where the Strategic Freight Network for Rail come together with the Strategic Road Network and the site can be developed to accommodate the necessary infrastructure and associated warehousing. Featherstone, Creswell and Rugeley Power Station are simply not considered to represent suitable alternatives in the context of a SRFI's fundamental requirement to facilitate efficient modal shift from road to rail.

9.1.7 When compared to Dunston, the WMI site is considered to be a much more suitable site for a large SRFI development. Despite the long establish need for further SRFI/RFI development in the West Midlands, the Dunston site has never been genuinely promoted, privately or through the numerous policy documents or reports, for large-scale employment development. It has only been identified in the ASA through a map search undertaken by the WMI Team.

9.1.8 Dunston is protected as Open Countryside and is an existing open rural landscape that is visually cohesive and well connected with its broader landscape context. A development of the size and scale of a SRFI would be very difficult to successfully assimilate or mitigate in landscape and visual terms and the resultant effects on the landscape character of the site and its context would stretch over a much broader area so that the visual impacts would be greater due to the site's existing openness and rural character and the absence of existing industry, urban influences or woodland from its setting.

9.1.9 The creation of development platforms at the Dunston site would require substantial re-profiling, further disrupting the rural character. In addition, the existing water courses that lie to the west of the WCML would need to be realigned or culverted to allow the development of the site and an efficient layout could not be achieved which avoids the existing floodplain in the wester section of the site.

9.1.10 Finally, land assembly at Dunston would be required to achieve a suitable sized development site, which would require it to be demonstrated that there were no alternative sites available. The combined impacts on this rural site, as well as the effects on local amenity, make the site unsuitable and is not considered to be an acceptable location for a SRFI or a suitable alternative to WMI.

9.1.11 Whist the WMI site is designated Green Belt land, it's surrounding context is made up of a mix of uses, features and influences. Areas of agricultural use, mineral

workings and woodland (Calf Heath Wood) make up the site, however, the neighbouring chemical works at SI, the Four Ashes Industrial Area, Veolia Energy Recovery Facility and the recently completed Bericote warehouse development influence the landscape and contribute to a more built up and industrial setting.

9.1.12 In addition, WMI is located closer to the Wolverhampton/Birmingham conurbation and could more effectively serve that market.

9.1.13 The WMI site, therefore, offers the opportunity to create a SRFI development and is considered to perform significantly better than the identified alternative sites. In fact, none of the other sites identified can be regarded as genuine alternatives. Given these conclusions, and in the context of the scale and character of the unmet need demonstrated in the **Planning Statement** [Document 7.1A] and **Market Assessment** [Document 7.4], it is considered that there are compelling reasons to conclude that the WMI proposal represents the only SRFI development option that can meet the identified need.

APPENDIX 1

Strategic Rail Freight Interchange Alternative Site Assessment Precedent

In developing an appropriate set of criteria for this ASA, a full assessment has been undertaken of available precedent and best-practice which has developed in previous similar applications. There have been a number of ASAs undertaken to support applications for SRFIs, which have subsequently been tested at public inquiry or examination.

Some of these ASAs were undertaken for developments proposed within the Green Belt, where establishing 'very special circumstances' can require proof that the proposed development could not be accommodated in alterative locations.

Howbury Park, Radlett, and Slough International Freight Exchange (SIFE) SRFIs are examples where the approach taken within an ASA was subsequently endorsed by both the Planning Inspectorate and Secretary of State. All these applications were made through the Town and Country Planning Act. SIFE, while not a DCO application, was tested against the NPS by the SoS at appeal.

The approaches taken to the ASA on the Daventry International Rail Freight Terminal (DIRFT III) SRFI and East Midlands Gateway (EMG) SRFI projects have also been endorsed by the Planning Inspectorate and the Secretary of State, with both applications having been granted DCO consent, although neither of the sites of the proposed SRFI is within the Green Belt.

Further details on theses SRFIs and the ASA methodologies are provided below.

Howbury Park

The Howbury Park proposals involved the development of a 198,000 sqm SRFI at Erith, Bexley. The application was originally refused by the local authority and subsequently granted planning permission by the Secretary of State in December 2007. In coming to his conclusions, the Inspector placed 'considerable weight' on the conclusions of the supporting ASA, agreeing that there were no viable alternative sites in the area of study (para 15.177). The Secretary of State endorsed this interpretation, similarly affording considerable weight to the lack of alternative sites (para 31).

The ASA was updated and resubmitted as part of a new planning application for Howbury Park in November 2015. This ASA included a review of the earlier ASA studies and a more comprehensive analysis of the long and short-listed sites. The findings of this ASA were broadly consistent with those of previous studies, with most sites dismissed as not comprising realistic SRFI development opportunities.

Radlett

The Radlett proposals involved the creation of a SRFI at Radlett Aerodrome, and had been the subject of an earlier planning application and appeal which was dismissed by the Secretary of State in October 2008.

The ASA that accompanied the first application at Radlett was criticised in the Secretary of State's decision and was considered to be materially flawed in several areas, including its limitation to sites within 2km of a railway line (para 16.129).

A second application for development was submitted in 2010 and an enhanced ASA was prepared in response to the Secretary of State's comments.

Following a second refusal and dismissal of appeal, the application was subsequently approved by the Secretary of State on 14 July 2014. Throughout the second application

process, the general approach taken within the ASA was endorsed. The Secretary of State concluded that the ASA was methodical and robust and he was convinced by its findings that there were no other sites in the search area that could come forward in the foreseeable future (para. 13.114).

SIFE

The Slough International Freight Exchange (SIFE) application proposed the development of nearly 200,000 sqm of warehouse floorspace at Colnbrook, Slough. The application site was 58.5 hectares and located in the Green Belt.

Whilst the application was refused consent by Slough Borough Council in September 2010 and the subsequent appeal was dismissed by the Secretary of State in July 2016, in coming to his conclusions the SoS agreed with the Inspector that there was no identified alternative site to SIFE (para 12.156). The Inspector considered that there was no other site capable of fulfilling the same purpose, serving the same markets and being geographically comparable in order to achieve the desired spread of SRFIs round Greater London.

DIRFT III

The DIRFT III application proposed a 731,000 sqm expansion of the existing Daventry International Rail Freight Estate which comprises DIRFT I and II at Daventry, Northamptonshire. The application site was 345 hectares and located on a greenfield site.

The DCO application included a comprehensive analysis of alternative sites. Of the alternatives immediately adjacent to the application site, the Inspector agreed that only one could be considered suitable but was precluded by the development of a Sustainable Urban Extension (para 4.20). Overall, the Inspector concluded that there were no opportunities to expand DIRFT other than on the application site proposed (para 4.21) and DCO consent was granted in July 2014.

EMG

The East Midlands Gateway (EMG) application proposed the development of a 600,000 sqm SRFI at Castle Donnington, Derby. The application site was 336 hectares and located on a greenfield site.

A study was undertaken on behalf of the local authorities to identify and assess potential large sites of at least 50ha, which could be rail-linked and suitable for development of SRFIs. The study short-listed three sites, including the EMG site. Overall the Inspectors considered (para 3.2.23) and the SoS agreed (para 12), that the applicant's assessment of alternatives, both in the application documents and in responses to questions asked by the Inspectors, satisfied the requirements of the NPS. DCO consent was granted in January 2016.

The following table summarises the methodology used for Howbury, Radlett, DIRFT III, SIFE and EMG ASAs:

	Howbury (2015 ASA)	Radlett (2010)	DIRFT III (Daventry)	SIFE (Slough)	EMG[13] (Castle Donnington)
Green Belt?	**Yes**	**Yes**	**No**	**Yes**	**No**
Approximate Size of Search Area?	**3,000 sq km**	**1,600 sq km**	**6,500 sq km**	**3,800 sq km**	**3,600 sq km**
1. Defining the search area	The catchment area used includes land from the A1 (M) in the north and eastwards around to the M3 in the south west, extending out from Central London to some 32km beyond the M25. It was noted in practice that sites located in the extremity of this catchment would be unable to efficiently and sustainably meet the demands of the London freight logistics industry.	The north west sector of the M25 running from the M4 motorway to the west to the A1 in the east, extending 32km from the M25, as an outer limit.	All those sites that have a shared boundary with the existing DIRFT facility are considered (i.e. sites that share a boundary with either DIRFT I or II). In addition, the search area extended to the south, along the M1 to Milton Keynes. To the north, up the M1 towards Nottingham. To the west, the area of search extends in an arc, including Derby, Coventry and Daventry. To the east, the search area follows the A43, including Corby, Kettering and Wellingborough.	Within the M25, the area enclosed by the A3, South / North Circular roads and the A1; and extending 32km west and north from the M25, the area enclosed by the A3 south west of London around to the A1 / A1(M) / East Coast Main Line north of London.	The study area was made up of the 'Three Cities Sub-Area' as defined by the East Midlands Regional Plan. It comprises the Housing Market Areas of Derby, Leicester and Nottingham.

[13] EMG did not provide an Alternative Sites Assessment, but instead relied upon the "Strategic Distribution Site Assessment Study for the Three Cities Sub-Area of the East Midlands" which recommended the EMG site for a SRFI development.

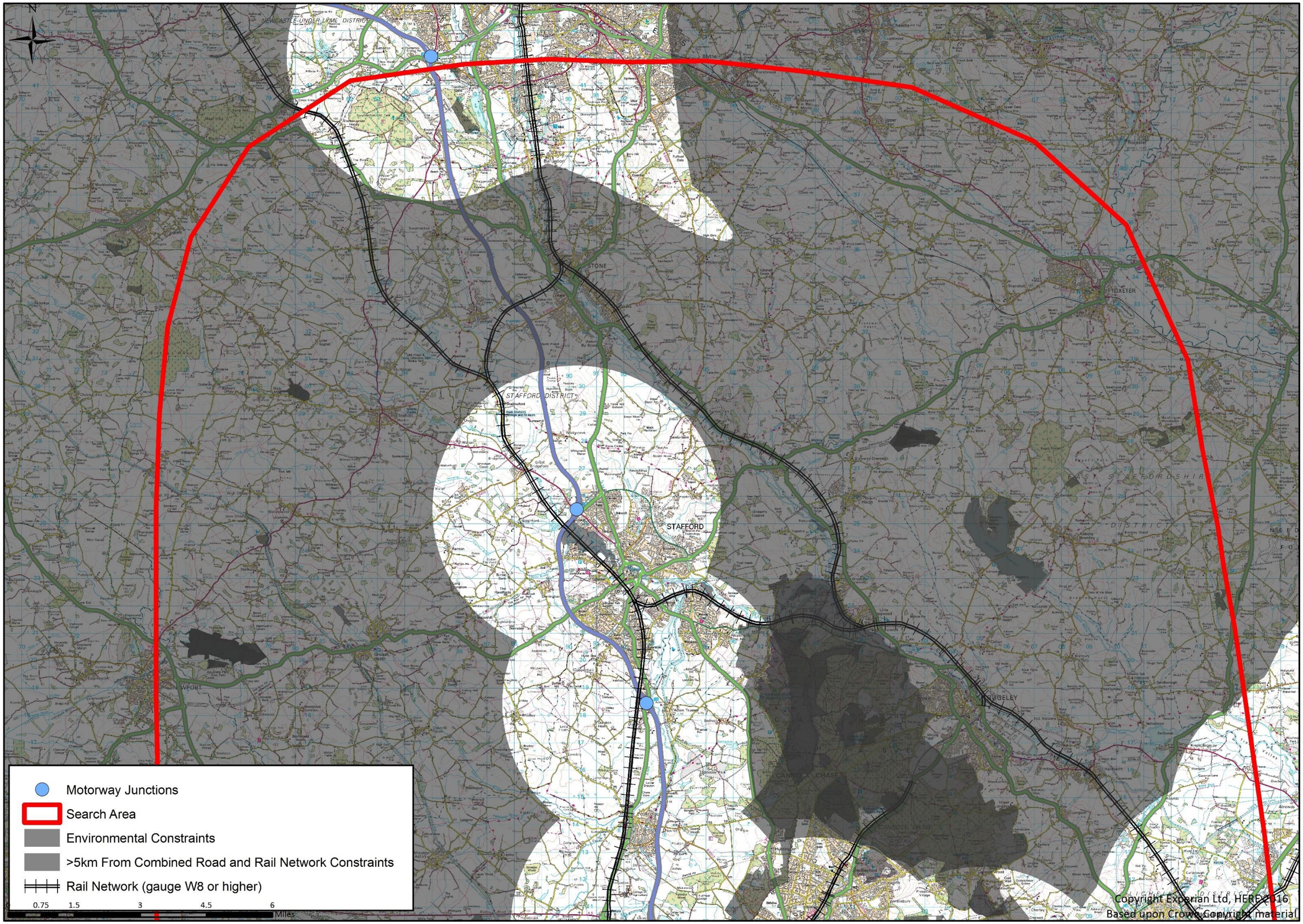
	Howbury (2015 ASA)	Radlett (2010)	DIRFT III (Daventry)	SIFE (Slough)	EMG[13] (Castle Donnington)
2. Initial Site Identification Process	The study adopted a requirement for sites to be: • a maximum of 2km from a rail route; • within 5km of a motorway and 2km from other major roads; and • within 32km of the M25.	As stated above, the first application at Radlett was criticised in the Secretary of State's decision and was materially flawed in several areas, including its limitation to sites within 2km of a railway line. Therefore, the second study required sites: • to be within 5km of a railway line; • to be within 5km of a motorway junction or A road; and • to have a minimum size of 40ha; • to be within the defined NW sector from the A1 to M4 and within 32km of a M25 junction.	The study required potential alternative sites to be: • within 5km of a rail line; • within 5km of a motorway junction or major road.	The initial list was a list of sites which, at first appearances, could potentially act as an alternative location. Sites had to meet <u>all</u> the following criteria: • adjacent or in close proximity to main line railway of W8 or greater; • within 5km of a motorway junction or similar; • at least 40ha of developable land; • of suitable configuration / geographical characteristics; and • currently available for development.	The list of sites was compiled from those put forward by LPAs and other stakeholders. The four "Go / No Go" Questions were: • Is rail connectivity available without significant upgrades to gauge? • Is the road access sufficient i.e. are there nearby motorway / trunk road junctions? • Is the site approx. 50ha +? • [Not] within the boundary of Sustainable Urban Extension?
3. Site Assessment Criteria	The following site assessment criteria were adopted and applied against sites identified. 1. Site Area – 40ha minimum	The following site assessment criteria were adopted and applied against sites identified. 1. Topography: 1:50 threshold	The following site assessment criteria were adopted and applied against sites identified. 1. Site Area – 40ha; 2. Proximity to rail infrastructure	A preliminary assessment of the 'initial list' was undertaken assessing each site from the following perspectives:	All sites that passed through the 'Go / No Go' moved through to the grading stage. This allowed a numeric / traffic light comparison,

	Howbury (2015 ASA)	Radlett (2010)	DIRFT III (Daventry)	SIFE (Slough)	EMG[13] (Castle Donnington)
	2. Topography – relatively flat site required 3. Rail connection to be available with minimum W8 gauge and within 2km of a railway 4. Road connection to be achievable with sufficient highway capacity 5. Access to other modes of transport 6. Relationship to other land uses 7. Policy constraints	2. Rail connection to be achievable 3. Road connection to be achievable 4. Availability (i.e. discounted those with planning permissions for other land uses and those with residential allocations)	(5km) and ability to access the rail infrastructure; 3. Proximity to road infrastructure (5km from a motorway junction and 5km from a major road) and ability to access the road network; 4. Relationship with other land uses; 5. Topography – each site is assessed on its merits; 6. Planning policy; 7. Ability to serve DIRFT I and II.	1. Rail connectivity and capacity; 2. Highway connectivity and capacity; and 3. Availability.	based on the following: 1. Rail Access 2. Road Access 3. Site Design Opportunities 4. Planning 5. Contribution to Regional Growth 6. Commuting 7. Demand 8. Environmental 9. Cost
4. Comparison of short-listed sites with proposals	Stage 3 above led to identification of a short-list of sites that were compared to the development proposals. A full commentary is provided against each of the criteria to compare each of the identified sites against each other.	Stage 3 identified a short-list of sites that were then compared to the Radlett scheme against market criteria (site area, topography, rail and road infrastructure, and land ownership) and sustainability/policy issues (relationship to other land uses including	All 7 criteria above were used to create a matrix which allocated one of the following three possible outcomes for each site vs each criteria: 1. Site characteristic was considered to allow RFI development;	Stage 3 identified a short-list of sites that were then compared to the SIFE scheme against railway connectivity and capacity; configuration and layout; highway connectivity and capacity; proximity to workforce; noise impact; ecological impact; landscape impact; air quality;	Stage 3 involved the modelling and detailed assessment of most likely sites. This broadly grouped the remaining sites into two groups: 1. Those which are potentially good SRFI sites, but have other uses that may be more important to

	Howbury (2015 ASA)	Radlett (2010)	DIRFT III (Daventry)	SIFE (Slough)	EMG[13] (Castle Donnington)
		accessibility to workforce, landscape, heritage, biodiversity severance and land use policy).	2. Site characteristic created constraint, but with the potential to overcome through mitigation/scheme design; or 3. Site characteristics are such that there are significant constrains to RFI development making it unsuitable.	flood risk; land use policy; and ownership. This was done with a summary of the assessments under each category. The SIFE and short-list sites were also compared in respect to their impact on the regional road network and their estimated emissions of greenhouse gases. All the shortlisted alternatives lay within the Green Belt and therefore a Green Belt study was also prepared which considered the potential effects and implications of each of the shortlisted alternative sites, together with SIFE, for the Green Belt.	meet regional needs 2. Those sites that are potentially good SRFI sites.

APPENDIX 2

Refined Site Search Area


NEWCASTLE-UNDER-LYME DISTRICT
STONE
STAFFORD DISTRICT
STAFFORD
EAST STAFFORDSHIRE
Motorway Junctions
Search Area
Environmental Constraints
>5km From Combined Road and Rail Network Constraints
Rail Network (gauge W8 or higher)
0.75 1.5 3 4.5 6
Miles
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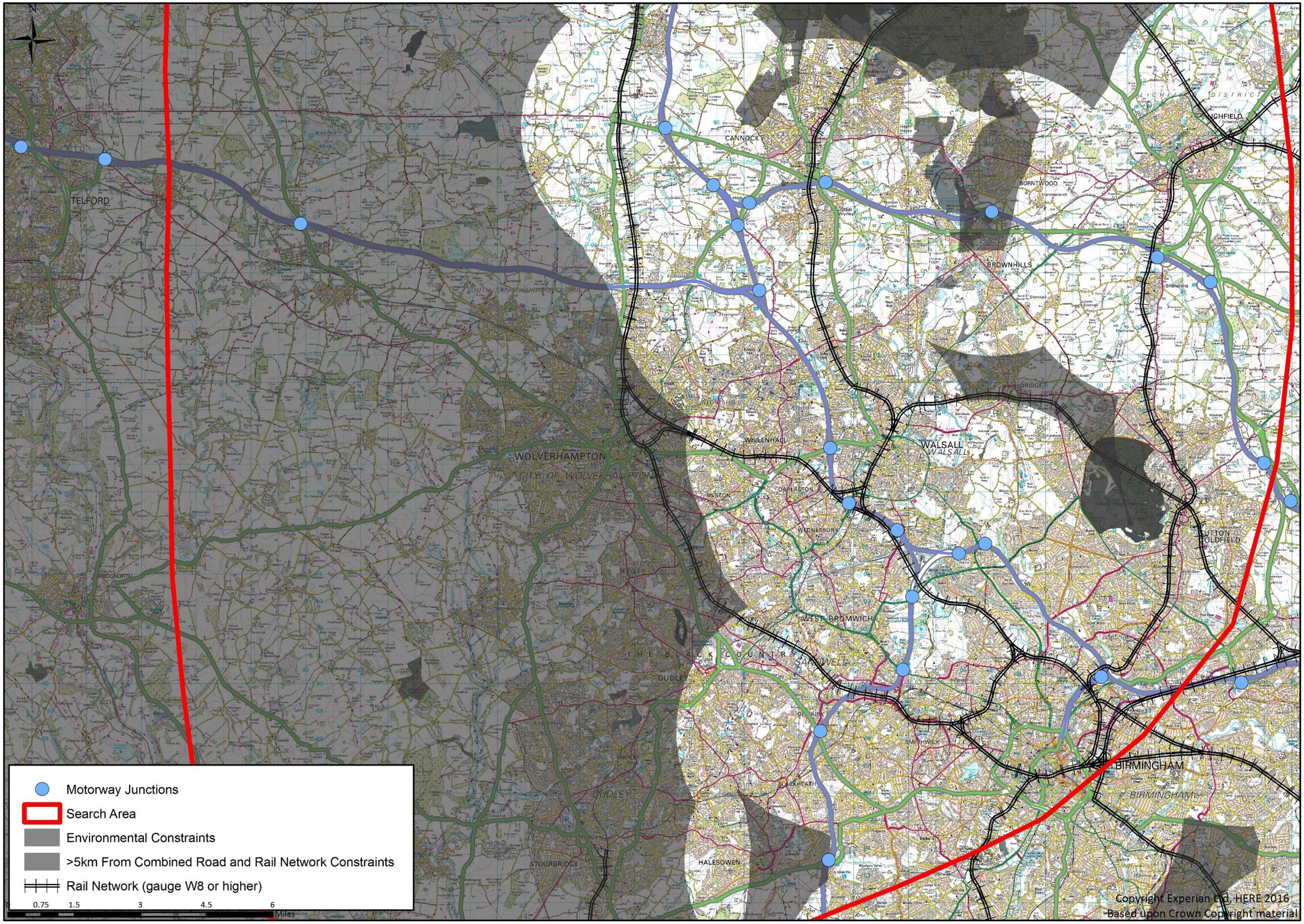
TELFORD
CANNOCK
BURNTWOOD
BROWNHILLS
LICHFIELD
WOLVERHAMPTON
WALSALL
WEST BROMWICH
BIRMINGHAM
DUDLEY
STOURBRIDGE
HALESOWEN
BRIDGNORTH
SUTTON COLDFIELD
Motorway Junctions
Search Area
Environmental Constraints
>5km From Combined Road and Rail Network Constraints
Rail Network (gauge W8 or higher)
0.75
1.5
3
4.5
6
Miles
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APPENDIX 3

Planning Policy Documents Reviewed

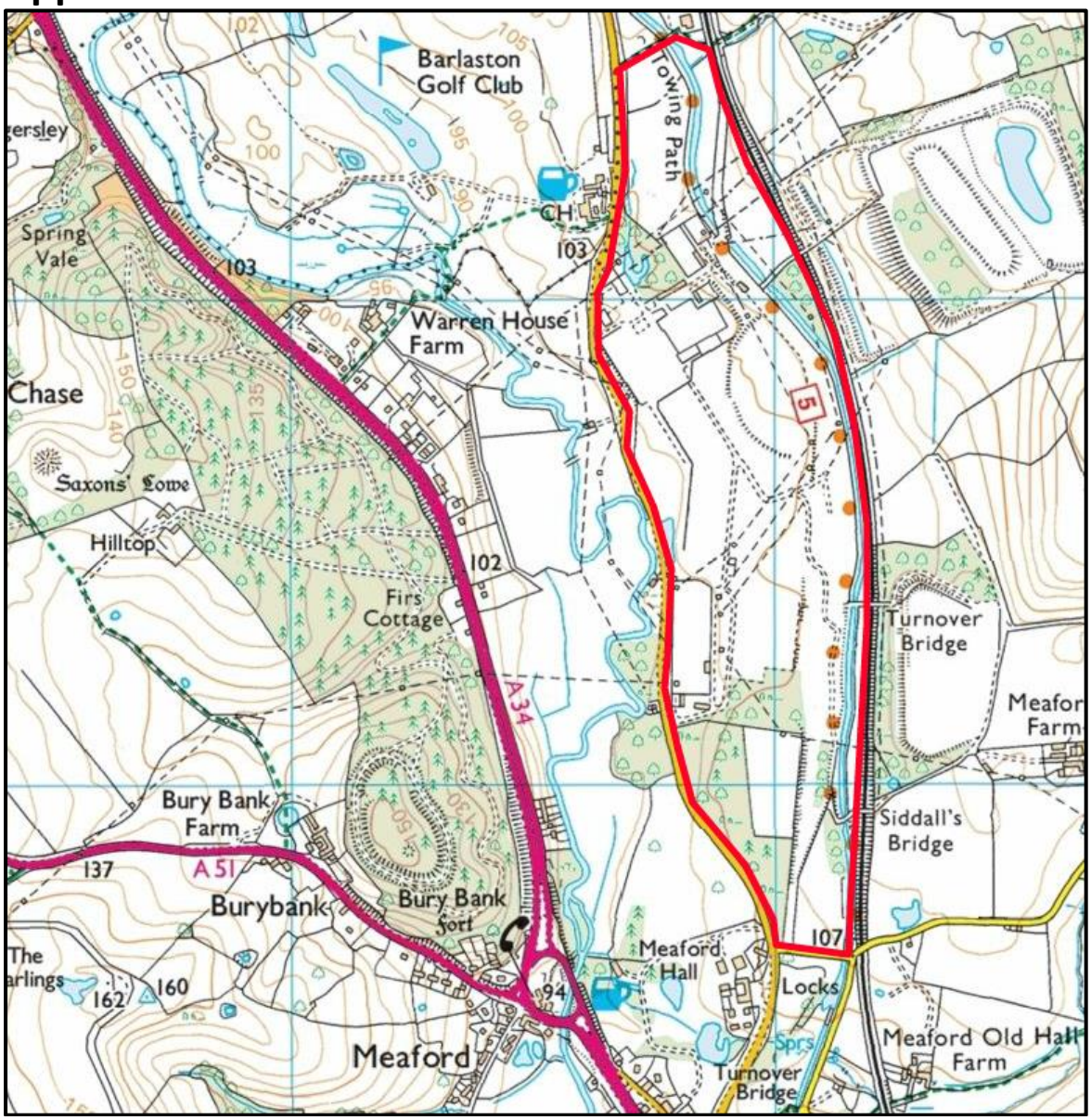
Region	Documents	District	Documents
Staffordshire	The new Minerals Local Plan for Staffordshire 2015 – 2030 Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2026 (March 2013)	South Staffordshire	Core Strategy Development Plan Document (December 2012) Draft Site Allocations Document Submission Plan (September 2017) ROF Featherstone Viability and Delivery Options Study Stage 1 (December 2013) Employment Land Study South Staffordshire 2012 (February 2013)
		Stafford	The Plan for Stafford Borough 2011-2031 (June 2014) Stafford Proposals Map Employment Land Review 2012
		Cannock Chase	Local Plan (Part 1) 2014 Policies Map (2014)
Black Country	Black Country Core Strategy (February 2011) Black Country Joint Core Strategy Assessment of Employment Sites (November 2009) Black Country Joint Core Strategy Employment Land Review (April 2008)	City of Wolverhampton Walsall Dudley Sandwell	Wolverhampton Local Plan Policies Map Walsall Site Allocation Document, Pre-Submission Modifications Plan, Showing modifications agreed post-publication, Pre-Submission Consultation Stage, November 2016 Walsall Employment Land Review (March 2016)

Region	Documents	District	Documents
	Black Country Updated Core Strategy - Issues & Options Report (June 2017) Black Country Economic Development Needs Assessment (May 2017) WECD		Walsall industrial development pipeline Q1 2016 Dudley Policies Map Sandwell Site Allocations and Delivery Development Plan Document Sandwell policies map Sandwell Employment Sites Identification Study (Draft Report) (June 2011)
Other local and regional documents	West Midlands Strategic Employment Sites Study (Peter Brett Associates/JLL)(September 2015) Black Country and South Staffordshire: Sub Regional High Quality Employment Land Study, 2014/2015, Stage 2 Report (August 2015) Black Country and South Staffordshire: Sub Regional High Quality Employment Land Study, 2014, Stage 1 Report (November 2014) Black Country and southern Staffordshire Regional Logistics Site Study (URS) (April 2013) West Midlands Regional Spatial Strategy (Revoked)(January 2008) West Midlands Regional Spatial Strategy Phase 2 Revision Draft West Midlands Regional Spatial Strategy Phase Two Revision Panel Report (September 2009)		

APPENDIX 4

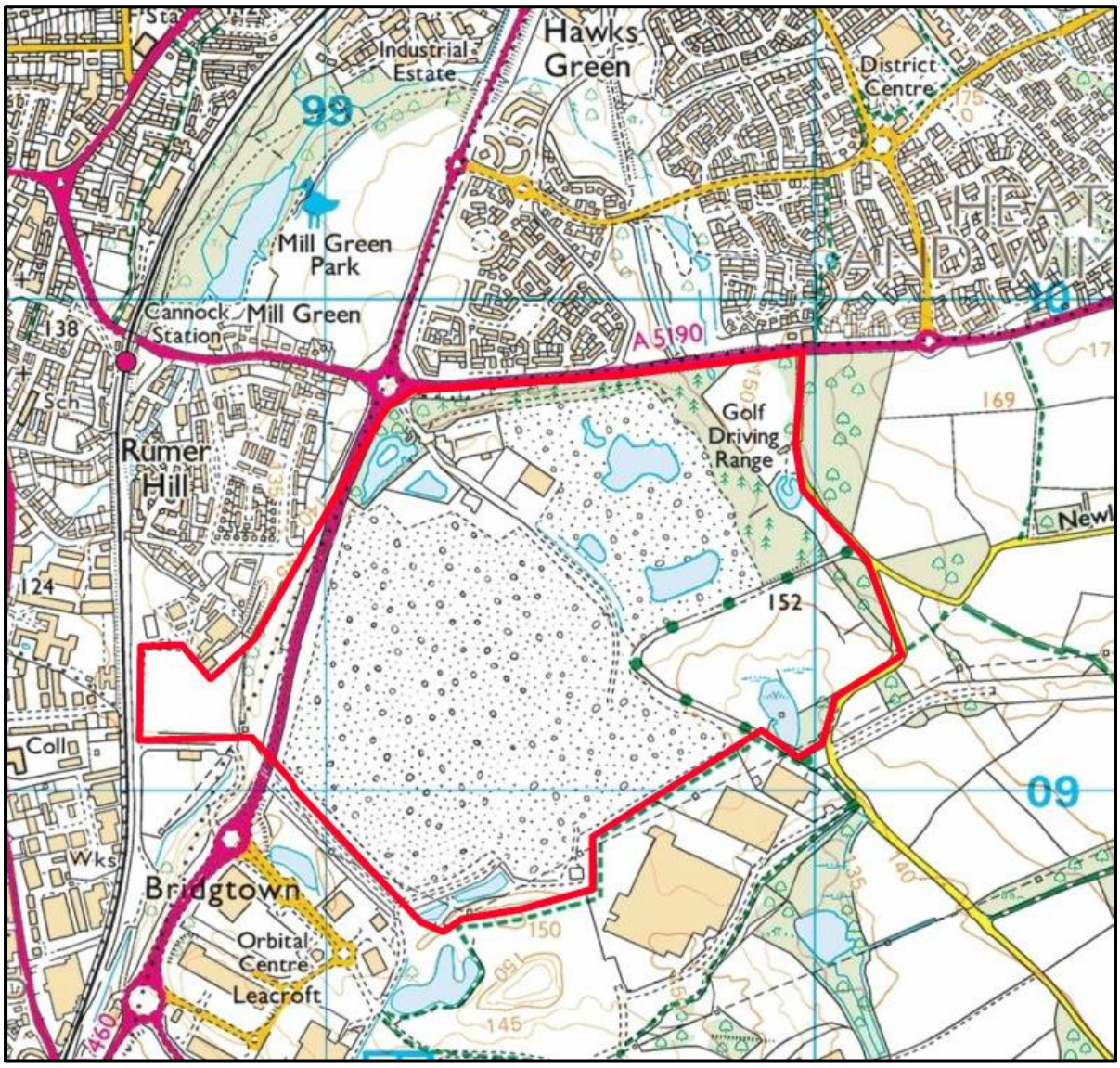
Assessment of the Long-List of Potential Alternative Sites

Site 1: Meaford Power Station
Approx. 65ha



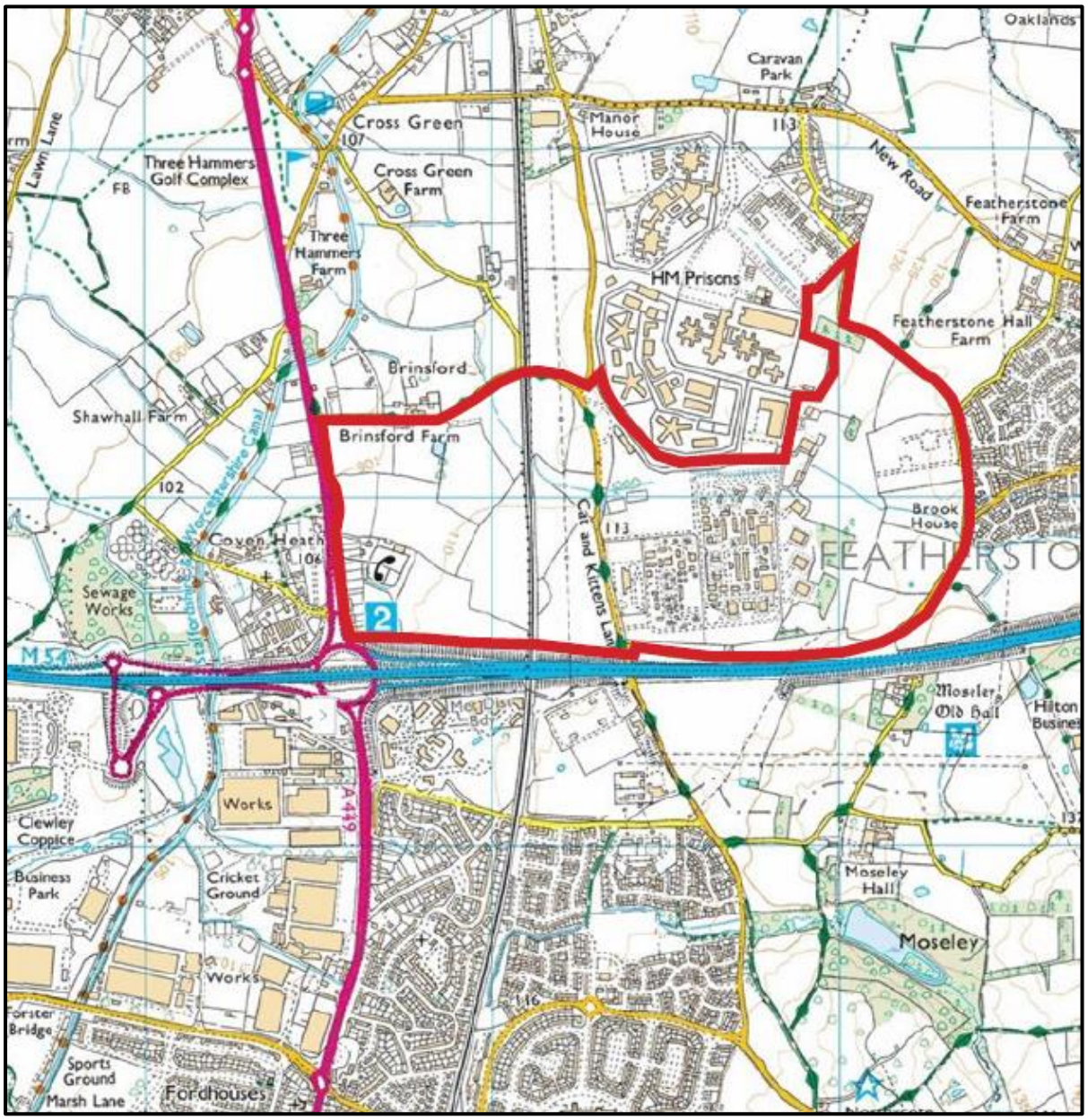
Site 1: Meaford Power Station		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	The site is approximately 65ha and, therefore, is large enough to be considered an NSIP and SRFI by the threshold set by the Act.	
Rail Connectivity	The adjacent Staffordshire to Manchester branch line of the WCML at W10 gauge would provide suitable rail infrastructure for a SRFI development. There is no existing connection to the existing branch line and to reach the site it would require a rail bridge across the canal (which is also a conservation area), at significant cost.	
Road Connectivity	Recent improvements have been made to the access the Meaford Power Station and a new Junction has been constructed at the A34. However, the A34 is a dual carriageway road and the suitability of the road decreases further from the site on the routes towards the strategic road network. The nearest connections to the strategic road network are junctions 14 and 15 of the M6, which are 12km and 10km, respectively, away from the site. Furthermore, all routes to the strategic road network have direct residential frontage and pass through several built-up areas further reducing the suitability of the site.	
Additional Criteria		
Relationship to Other Land Uses	No other significant local land uses.	
Planning Policy	The site is designated as a Major Developed Site, but is washed over by the Green Belt. The canal Conservation Area also runs through the site.	
Topography	Minimal gradient changes across the majority of the site and therefore suitable for a SRFI development.	
Availability	A Development Consent Order has recently been granted for a new power station on the site which would prohibit a SRFI development at the site.	
Conclusion	The site is isolated from the Black Country conurbation market, requiring significantly greater HGV travel to serve demand than WMI, 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 a SRFI development at the site.	

Site 2: Mid Cannock Colliery/Poplars Landfill Site
Approx. 100 / 106 ha



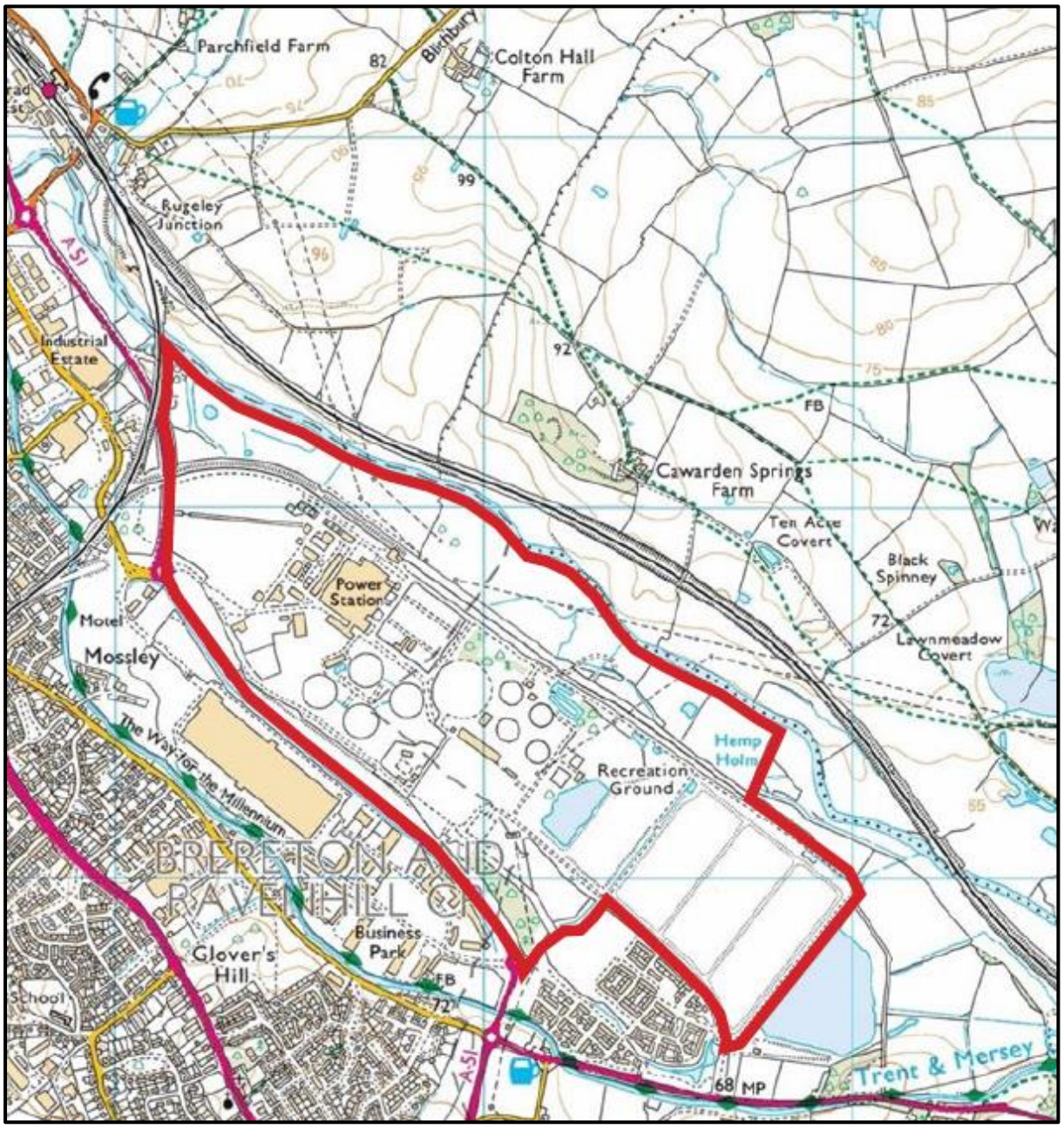
Site 2: Mid Cannock Colliery/Poplars Landfill Site		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	The site is approximately 100ha and, therefore, is large enough to be considered an NSIP and SRFI by the threshold set by the Act.	
Rail Connectivity	The Chase Line runs at W10 gauge runs within close proximity of the site, but there is no existing connection to the rail line and there would be a requirement to create a new connection. The existing development located between the site and the rail line would prohibit the connection of the site to the rail line.	
Road Connectivity	Direct access to the A460. Access to the M6 toll is approximately 700m along the A460.	
Additional Criteria		
Relationship to Other Land Uses	The site is used for landfill, creating significant local level changes. It is therefore not suited to accommodate a SRFI development.	
Planning Policy	The site is in the Green Belt where there is a requirement to demonstrate very special circumstances to justify inappropriate development.	
Topography	The site is used for landfill, creating significant local level changes. It is therefore not suited to accommodate a SRFI development.	
Availability	The site is not marketed for development and is not known to be available. Historic landfill site.	
Conclusion	The infrastructure requirements to achieve rail access detracts from the site's ability to accommodate a SRFI. In addition, its topography due to its use as landfill would undermine the ability to provide a SRFI in this location. Its Green Belt status also undermines its attractiveness as an alternative to WMI. For these reasons, the site will not be carried forward to the next stage.	

Site 3: ROF Featherstone
Approx. 120ha



Site 3: ROF Featherstone		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	The site is approximately 120ha and, therefore, is large enough to be considered an NSIP and SRFI by the threshold set by the Act.	
Rail Connectivity	The West Coast Main Line intersects the site at W10 gauge. There is no existing or previous mainline connection and as a consequence there will be a requirement to create a new connection to the main line.	
Road Connectivity	Direct access to the A449. Access to Junction 2 of the M54 is via 600m of the A449.	
Additional Criteria		
Relationship to Other Land Uses	A small amount of residential development to the south west of the site and Featherstone village borders the site to the east, with Brinsford village to the north. The site is also bordered by Oakwood Prison to the north.	
Planning Policy	The emerging South Staffordshire Site Allocations Document has identified a residential allocation within the development site, which would be an inappropriate neighbouring use for a SRFI. The site is in the Green Belt where there is a requirement to demonstrate very special circumstances to justify inappropriate development.	
Topography	Minimal gradient changes across the site and therefore is appropriate for SRFI development. The layout of the site could potentially accommodate a SRFI development.	
Availability	The site is owned by a private developer and it is anticipated that a separate planning application will be submitted in Summer 2017.	
Conclusion	The site is of an appropriate size, with the ability to connect to the strategic road and rail networks and therefore will be carried forward to the next stage of the assessment.	

Site 4: Rugeley Power Station
Approx. 145ha

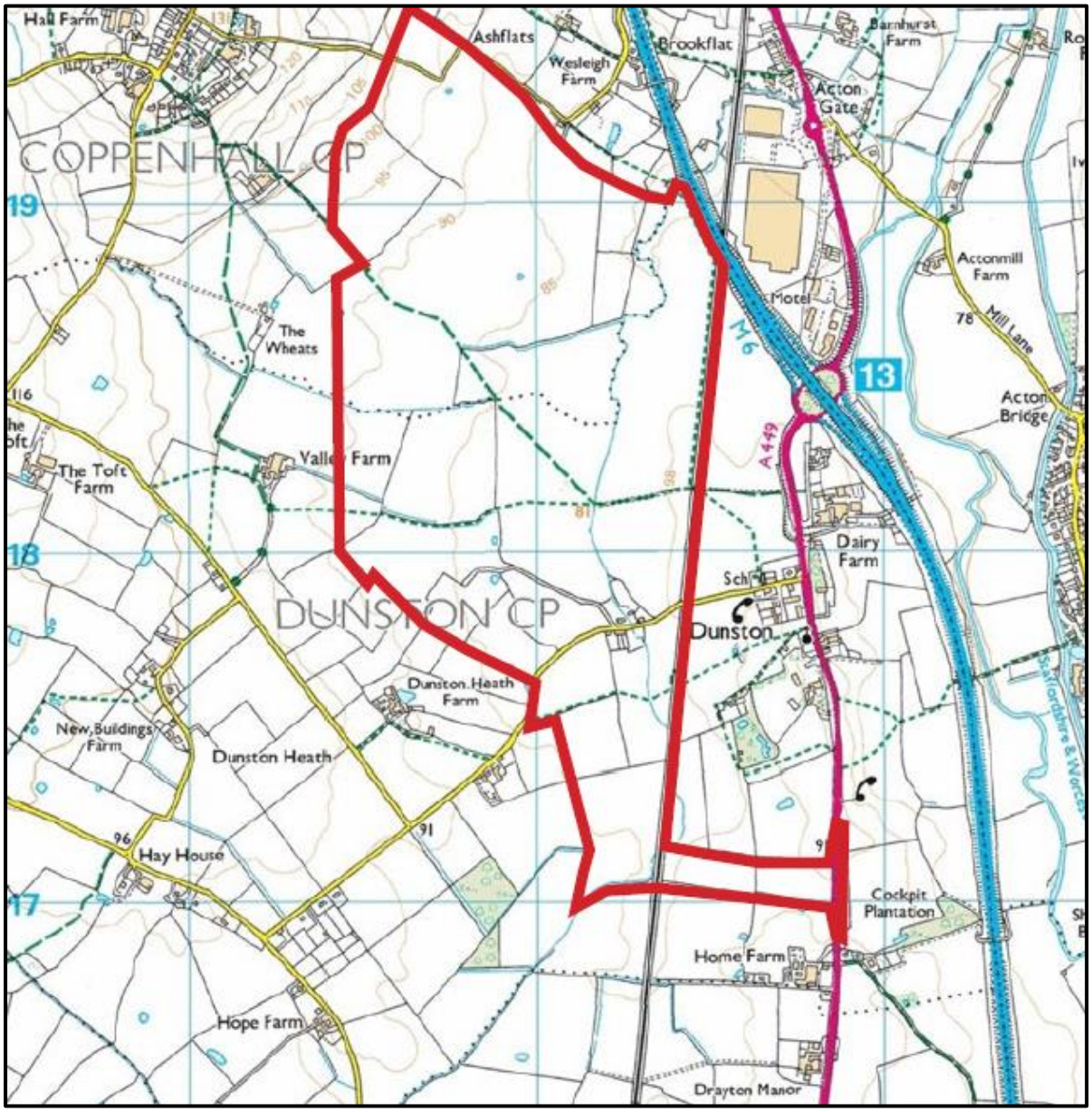


Site 4: Rugeley Power Station		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	The site is approximately 145ha and, therefore, is large enough to be considered an NSIP and SRFI by the threshold set by the Act.	
Rail Connectivity	The site lies adjacent to the Chase Line and the Trent Valley Line that forms part of the WCML. Both rail lines are at W10 gauge, which provides suitable rail infrastructure for a SRFI development. There are existing connections from the Chase Line, which allow one-way access into the site. There are 1500m rail sidings within the site, which would be above the required length for sidings of a SRFI development.	
Road Connectivity	The A5 and M6 Toll are the closest connections to the strategic road networks and are situated approximately 14km south west of the site. The A51 and A460 provide a south western route towards these connections on the strategic road network. Whilst the site is situated within 5km of an A road (A51), which is of a good standard, the quality of the A51 decreases further from the site on the routes towards the strategic road network. Furthermore, all routes to the strategic road network have direct residential frontage and pass through several built-up areas further reducing the suitability of the site.	
Additional Criteria		
Relationship to Other Land Uses	The site lies adjacent to a large distribution centre, whilst there is also a large residential development neighbouring the site to the south east which would require significant mitigation if a SRFI development was to come forward.	
Planning Policy	The site lies within both Cannock Chase and Lichfield District Council land. The Councils adopted the Rugeley Power Station Development Brief Supplementary Planning Document on 20 February 2018. The document has been produced to guide the future redevelopment of the site and aims to assist with the delivery of Lichfield District Council's Local Plan Strategy Core Policy 1, particularly delivery of 10,030 dwellings over the plan period to 2029. The SPD states that residential development will be the principle land use for the site and that the site has capacity for a minimum of 800 new dwellings.	
Topography	There are minimal gradient changes across the site. The location of the existing rail sidings somewhat limit the	

	flexibility of the site layout, but it would still be capable of accommodating a SRFI development.	
Availability	The site was recently decommissioned and an application to demolition the existing buildings on site was submitted in March 2018.	
Conclusion	Analysis has outlined that the Rugeley Power Station site can be confidently dismissed on highways grounds.	

Site 5: Dunston

Approx. 225ha



Site 5: Dunston		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	180ha and of sufficient size to accommodate a SRFI.	
Rail Connectivity	The Birmingham Loop Line, which forms part of the West Coast Main Line, intersects the site at W10 gauge, providing a suitable rail infrastructure for a SRFI development. There are no existing or previous main line connections and a new at-grade connection would be required. A new rail link would be required from the mainline railway into the site including a requirement for a new connection to the main line. The rail link would not be required to make any significant level changes to allow access into the site.	
Road Connectivity	It may be possible to provide direct access to Junction 13 of the M6. Alternatively, the site would be able to connect to the A449, which would provide access to the M6 via Junction 13 at a distance of 1km.	
Additional Criteria		
Relationship to Other Land Uses	Residential villages of Coppenhall and Dunston in close proximity to the site with a small number of dwellings bordering the site. Acton Gate warehouses close to the site, across the M6.	
Planning Policy	The site is designated as being in the Open Countryside. Only small-scale development is normally permitted in the Open Countryside.	
Topography	Some gradient changes across the site – some cut and fill would potentially be required to the west of the site.	
Availability	Uncertain. The site is not promoted for any use and has fragmented ownership.	
Conclusion	The site is of an appropriate size with the ability to connect to the strategic road and rail networks and therefore will be taken forward to the shortlist.	

Site 6: Creswell

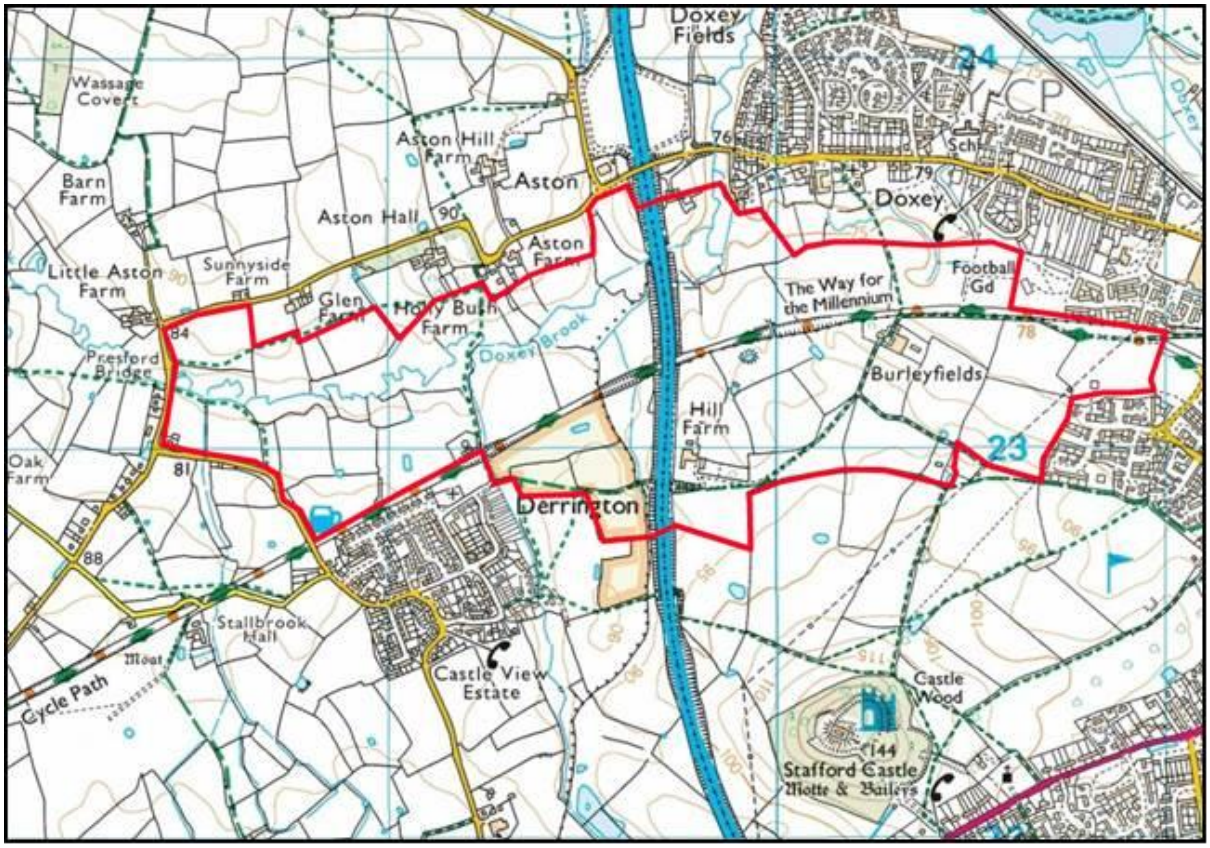
Approx. 280ha

Site 6: Creswell		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	The assumed site is approximately 280ha and is considered to be of sufficient size to accommodate a SRFI.	
Rail Connectivity	The site has over 2.5km of frontage onto a suitable main line (West Coast Main Line, W10 gauge and electrified) and thus could be able in principle to accommodate main line access from either direction of travel and on-site stabling / handling sidings running parallel with the main line. Two intermediate overbridges might need to be closed or repositioned to make room for the sidings. As no main line connection has ever existed into the site, new connections would be required. Any new connections into the 4-track main line would be likely to require full grade-separation as the "Slow" lines over which freight trains travel are on the opposite side of the main line to the site. It is not known whether Network Rail would accept new connection(s) at this point, nor the impact that the costs of any grade-separated access would have on viability. Topography and flood areas along the rivers will require significant raising of the development platform in order to bring the levels up to an acceptable gradient to the WCML and bring the terminal or reception sidings out of the flood zone.	
Road Connectivity	This site is located immediately north of M6 J14, adjacent to the M6. This site would be accessed off of the A5013. The A5013 in this location is a single carriageway. A SRFI at this location would appear to be possible in terms of achieving appropriate access to the highway network; however, it would result in an impact to residential properties on the access routes and may require significant road improvements.	
Additional Criteria		
Relationship to Other Land Uses	The site is located in close proximity to a number of residential receptors, particularly those along Creswell Grove which could be affected by noise and air quality emissions from the site and associated traffic.	
Planning Policy	The site lies within Stafford Borough Council. The site itself is rural and previously undeveloped. The site is not designated but it is located approximately 50m from Doxey and Tillington Marshes SSSI.	
Topography	Topographically, the site falls from a high point of around 110m AOD on the north-eastern boundary, towards the River Sow in the south west at below 75m AOD, corresponding to a	

	35m fall across the site. The River Sow floodplain, occupying the south western half of the site is relatively level.	
Availability	The site comprises agricultural land in multiple ownership.	
Conclusion	The site has known several constraints however, it is large enough in principle to accommodate a SRFI development and could have the potential for connection to the strategic rail network. Therefore, the site will be taken forward to the shortlist.	

Site 7: Stafford West

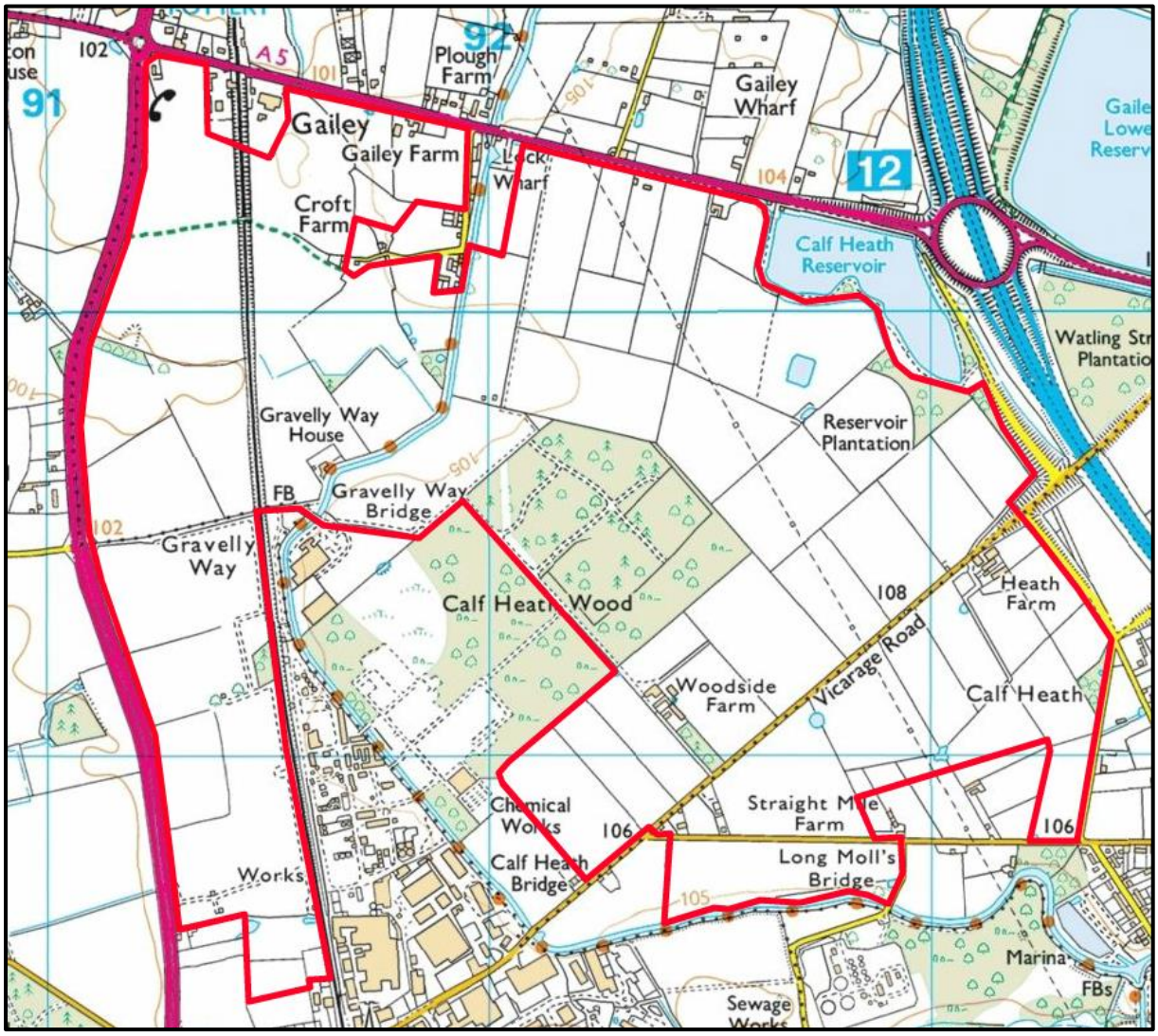
Approx. 120ha



Site 7: Stafford West		
Criteria	Comments	Acceptability
Fundamental Criteria		
Size	The site is approximately 120ha and, therefore, is large enough to be considered an NSIP and SRFI by the threshold set by the Act.	
Rail Connectivity	The site is located west of WMCL and there is a potential for direct access to the existing Up / Down Slow lines. It is considered that the site would be able to accommodate a 775m length trains Freight trains travelling to/from north would need to run-round in Stafford station.	
Road Connectivity	The site would require a new junction to be built on the M6 in order to allow access to the strategic road network. The scale and cost of creating a new motorway junction would render the site unviable. In addition, within Circular 02/2013 Highways England set out their position on the provision of new junctions onto the Strategic Road Network (SRN) for new development. With regard to new accesses and junctions onto motorways or roads of near motorway standard, these will not be allowed unless it can be demonstrated that it is essential for the delivery of strategic planned growth. For all other developments, access to motorways and roads of near motorway standard will be restricted to existing junctions only. On this basis, Stafford West has not been added to the short-list of alternative sites.	
Additional Criteria		
Relationship to Other Land Uses	The site is situated in close proximity to a large amount of residential development to the north and east.	
Planning Policy	A large portion of the site is designated by the Plan for Stafford Borough (June 2014) as a Strategic Housing Development Location and it is being relied upon to contribute to meeting the future housing needs of the council. On this basis, the site is not considered to represent a suitable location for a SRFI.	
Topography	Minimal gradient changes across the site and therefore suitable for rail freight development.	
Availability	The availability of the site is uncertain but the site is not being promoted for employment or logistics use.	
Conclusion	On the basis of the transport constraints and housing allocation, this site will not be carried forward to the next stage of the assessment.	

Site 8: West Midlands Interchange

Approx. 300ha



Site 8: West Midlands Interchange		
Criteria	**Comments**	**Acceptability**
Fundamental Criteria		
Size	The site is approximately 297ha and is therefore sufficiently large to accommodate a SRFI development.	
Rail Connectivity	The Birmingham Loop Line, which forms part of the West Coast Main Line, intersects the site at W10 gauge, providing suitable infrastructure for SRFI development. There is no existing or previous mainline connection and as a consequence there will be a requirement to create a new connection to the main line. North and south connections are possible.	
Road Connectivity	Direct access to the strategic road network via the A5. Access to Junction 12 of the M6 via 800m of the A5. Direct access to the A449. Access to Junction 2 of the M54 via 5km of the A449.	
Additional Criteria		
Relationship to Other Land Uses	A small number of residential properties lie within and adjacent to the site boundaries. The site is bordered by a significant amount of commercial development to the south, the Four Ashes Industrial Estate and the recently permitted Bericote scheme. The site is currently in use for sand and gravel extraction, which is due to cease in 2021.	
Planning Policy	The Staffordshire and Worcestershire Canal runs through the site, which is designated as a Conservation Area. The site is in the Green Belt where there is a requirement to demonstrate very special circumstances to justify inappropriate development.	
Topography	Minimal gradient changes across the site. The site allows for a flexible SRFI to be provided.	
Availability	The site has actively been promoted over ten years for a SRFI development.	
Conclusion	The site is of an appropriate size, with the ability to connect to the strategic road and rail networks and therefore will be carried forward to the next stage of the assessment.	