

**Staffordshire County Council**

**WMI Written Representation Summary**

**1. Highways**

- 1.1. The highways implications of the proposed scheme have been identified from the outset as a significant issue.
- 1.2. It is essential that West Midlands Interchange (WMI) provides parking and welfare facilities for WMI HGV drivers. The Extended Parking provision should allow drivers to take their designated 'sleep' break and be available to drivers for up to 12 hours before and/or after their allocated docking/arrival time at WMI.
- 1.3. FAL are proposing a HGV ban on HGV movements on the A449 through Penkridge. It is critical that the HGV ban is secured robustly and is enforceable to prevent HGV journeys routing through Penkridge when the motorway is open but running slowly.
- 1.4. Clarity is required on the process and procedure for detailed design and approval of the bridge structure that will carry the A5/A449 link road. Key principles will need to be secured via the DCO.
- 1.7 It is unclear when highway works will be delivered. The indicative phasing plan for the development suggests that work commence via access from the A5. However, Requirement 25 provides an exception that allows for 47,000 square meters of warehouse floor space to be accessed off the Vicarage Road before the A5 access is required.

**2. Landscape**

- 2.1. The ES Landscape and Visual Impact (LVIA) chapter refers to published Landscape Character Assessments as part of its evidence base. This includes reference to the Landscape Sensitivity Assessment for Employment Site Allocations (2015) prepared for South Staffordshire District Council, which may not be directly applicable.
- 2.2. The provision of higher warehouses to the centre of the site and smaller scale development closer to residential development and the canal is welcomed.

- 2.3. The current proposals to soften the appearance and break up the visual proportions of larger building elevations through use of mottled elevations and co-ordinated colour pallets appears to be a 'one style fits all' approach. There may be elevations where there is a conflict in potential solutions at the junction between differing treatments which would be visually intrusive.
- 2.4. It is suggested that an enhanced DAS or a Requirement for a design code for each phase to be approved prior to submission of any detailed plans is required.
- 2.5. With respect to minimising impacts on Cannock Chase Area of Outstanding Natural Beauty, the commitment in ES section 4.69, that '*Relevant best design practice will be drawn upon,*' is welcomed. The Council seeks commitment to refer to any guidance documents that might emerge in the intervening period specific to Cannock Chase AONB.
- 2.6. The County Council seeks clarity on the relationship of Finished Floor Levels (FFL) and bund heights relative to levels at the site boundary and surrounding landscape. As the mounding height would be controlled by FFL it follows that relatively higher FFLs will increase building and mounding heights relative to the surrounding receptors.
- 2.7. The County Council seeks further clarity on the proposals for limiting visual impacts of HGV parking and gantries in the rail terminal area and how this will be addressed at detailed design.
- 2.8. Phasing is particularly critical to limiting visual effects. From some locations there may be periods of open views of partially complete and/or complete development without the benefit of screen bunds or much intervening vegetation.
- 2.9. Advance planting, and where possible early bund construction would assist with visual mitigation.
- 2.10. A robust programme of maintenance of Green Infrastructure during establishment and ongoing management will be critical to ensure mitigation is effective.
- 2.11. A 'Design Brief' that sets out expectations for on-plot landscaping that compliments the Green Infrastructure proposals would be desirable.
- 2.12. The County Council is concerned that the Lighting Assessment does not fully address impact on landscape. This could be addressed via appropriate wording in the Requirements and dealt with at detailed design stage.

### **3. Ecology**

- 3.1. Uncertainties remain regarding the delivery and timing of the proposed bat hop-overs.
- 3.2. The DCO refers to changes to width of carriageway, this implies that GI could be decreased in order to widen carriageways, GI should be specifically excluded from the definition of verge etc. as at present GI is not defined in the DCO.
- 3.3. On GI / landscape plans the access into several of the zones is shown as very narrow gaps without splays. This clearly does not reflect the final plan when presumably GI will be further reduced to allow access. Biodiversity loss calculations should take this into account
- 3.4. Of greater concern are the internal linkages/accesses between zones A7b and A7c; and A7a and A7b. These cut across areas of conserved hedgerow that are proposed to be retained.
- 3.5. Further consideration is needed on how zones A7a and A7c are to be accessed and how impacts on the hedgerow can be negated or minimised if unavoidable.
- 3.6. A further concern is the effect of potential impacts on GI of shade/shadow from the units. It is therefore suggested that consideration of shade/shadow paths from development forms part of the detailed design consideration.

#### Overall habitat loss

- 3.7. The Environmental Statement table 10.11 shows net gains to most habitats following planting etc. However, this approach does not consider greater importance of established habitat, possibility of failure of created habitats, or timescale to establish new habitat.
- 3.8. Calculation using a metric would be likely to indicate that there is an overall net loss. Additional off-site mitigation may need to be considered.

#### Mitigation

- 3.9. Successful ecological and landscape mitigation needs to adopt an integrated approach, embracing habitat creation, landscape character enhancement and visual mitigation.
- 3.10. The Council seeks certainty that the proposed habitats would be appropriate and deliverable, an Addendum to the FEMMP that sets out the principles for habitat creation and management is required.
- 3.11. Assurance is required that soil management will facilitate delivery of habitat. It is suggested that the FEMMP should include a specification for soils to be provided in the meadow and wetland area.

3.12. The phasing plans and FEMPP need to ensure a substantial proportion of habitat is available at all times to ensure continuity of species populations.

#### Monitoring of habitat creation

3.13. The FEMPP should provide for habitat monitoring which will be needed to check that habitat creation is proceeding satisfactorily during the establishment phase and that management is adequate.

### **4. Flood Risk & Drainage**

4.1. In relation to sustainable urban drainage system (SuDS) design and approval the general principles are agreed. However, there is no provision in the Requirements for the maintenance of the SuDS scheme/s, which is essential to success over the longer term.

### **5. Economy**

5.1. It is anticipated that the warehousing will be for aimed at logistics operators and would constitute a B8 use class. However, the DCO is silent on any particular planning use class. We believe that this could create uncertainty that may have the potential to adversely affect inward investment.

### **6. Minerals**

6.1. With regard to assessing the impact of the proposal on mineral resources, it is considered that there is insufficient information in the application to meet the requirements of Policy 3 of the Minerals Local Plan. Consideration should be given as to whether there is scope for sand and gravel to be recovered as development progresses to be used in the construction works.

### **7. Phasing & Timing of Mitigation**

7.1. As alluded to above there is uncertainty and a lack of clarity on the phasing at which works will be undertaken and mitigation delivered.

7.2. In relation to the phasing of the Rail Terminal FAL have suggested they will seek to bring this forward as swiftly as possible and for surety are proposing a back-stop arrangement in the S106 agreement to potentially halt development until such time as the terminal is operational. It is considered that the floorspace and timing triggers have not been fully justified.

### **8. Development Consent Order and Obligations**

8.1. Discussions are ongoing with the applicant and we are looking to provide initial comments to FAL to incorporate in the revised Draft DCO for Deadline 3.

8.2. Similarly, further work is required, and discussions are on-going in relation to the S106.