

Stop The West Midlands Interchange – Response to ExA Questions

Deadline 2 April 5th 2019

1.1.1.

The Applicant

Policy Context

The Applicant, Local Authorities and other IPs who have commented on policy matters.

The National Networks National Policy Statement (NPS) (2014) provides the primary policy basis for decision making on applications for development consent for national network NSIPs and paragraph 5 of the NPPF states that it does not contain specific policies for NSIPs. The references to the NPPF in Planning Statement are to the revised (July 2018) version of that document but those in the ES and many of its appendices are to the 2012 version. Both have now been superseded and replaced by the NPPF issued in February 2019. In relation to matters covered in the ES are there any specific new or significantly amended policies in the 2019 NPPF which are of particular importance to the examination of the application and the decision by the SoS as to whether development consent should be granted?

RESPONSE

NPPF (Feb 2019) 15. Conserving and enhancing the natural environment.

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

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

It should be brought to the Planning Inspectorates attention that The National Association of Local Councils (NALC) who represent around 10,000 local parish and town councils has partnered with the Woodland Trust, Tree Council and National Union for Students as part of the Tree Charter, which sets out principles for a society in which people and trees can stand stronger together.

NALC quote “ We know the important role that trees play in absorbing carbon. They are therefore important tools in staving off climate change. Also, it is important to mention the role that trees play in reducing the risk of floods and mud slides and in hosting wildlife. They make urban environments more liveable places and landscapes richer and they create the necessary habitats for a wide variety of flora and fauna.”

NALC has taken part in DEFRA's "Protecting and Enhancing England's trees and woodlands" proposal (consultation opened Dec 2018 and closed 28th February 2019) to introduce measures designed to increase the protection of trees, in particular street trees. Overall the consultation seeks views on the UK Government's proposals to introduce four new measures to increase transparency and accountability in the process of felling street trees and to strengthen the Forestry Commission's power to tackle illegal tree felling (which has already taken place locally on the Bericote site) and strengthen protection of wooded landscapes.

Section 3.3 of the FEMMP does not identify veteran and future veteran trees or specify the additional protection measures that are recommended in Appendix 12.7. Neither does the FEMMP refer to the need for continued appraisal of long term management operations in relation to these retained trees to ensure their long term survival.

1.2 Need for the Proposed Development and Alternative Options.

1.2.3 Reference is made to the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP)

Is the need for a SRFI in South Staffs and for warehousing/logistics development of the type and scale proposed identified in any strategy or programme approved and adopted by the LEP?

RESPONSE

The simple answer is no. The LEP does not provide any support for this development and does not identify the need for this facility at this location.

The LEP <http://www.stokestaffslep.org.uk> work in conjunction with the Midlands Connect Project. Part of their strategy is the Midlands Rail Hub <https://www.midlandsconnect.uk/key-projects/midlands-rail-hub/> who quote "The Midlands Rail Hub is our flagship plan to future-proof the Midlands' rail network for generations to come."

The rail hub will support an extra £649 million of economic growth and investment annually by enabling faster and more frequent journeys across the Midlands and spreading easy access to HS2 services. These improvements will allow 1.6 million more people in the Midlands to reach its biggest towns and cities within an hour, bringing the east and west closer together.

This strategy can achieve 24 extra trains every hour, 12 in each direction, doubling the number of services and significantly improving journey times.

Railway capacity must also meet demand from freight. Four of the UK's five main freight routes pass through the Midlands. The Rail Hub would create space for an extra 36 freight paths a day, carrying £22 billion worth of goods every year. 4320

lorries shifted from road to rail each day under Midlands Rail Hub plans. The four principal areas of focus are:

- *New track and passing places (e.g. the construction of two chords at Bordesley)*
- *Longer and restored platforms (e.g. reinstating the fourth platform at Snow Hill station, remodelling Kings Norton and Water Orton, two more platforms and stabling facilities at Moor Street.)*
- *Improved junctions and signalling*
- *Some minor electrification*

1.5 Agriculture & Soils

1.5.3 Several RR's raise concerns about the loss of BMV land at a time of uncertainty with regard to the (post Brexit) future of the agricultural industry in the UK and refer to an increased need for food security and a reduced dependency on food imports.

RESPONSE

The application will involve the significant loss of BMV land. Most of the site comprises of Grade 2 & Grade 3 agricultural land:

In respect of the above the group would like to point out the NFU's comments on the Agriculture Bill 2017 -19.

"The NFU has urged the government to make the Agriculture Bill truly agricultural by ensuring food production is at its heart." "The NFU says the Bill should: Promote the nations strategic priorities by supporting domestic agriculture to ensure food security. "

"Value and protect British farming's high production, animal welfare and environmental standards."

Ref: nfuonline.com The Agriculture Bill – all the information in one place.

We can find no evidence that the applicants' have considered in their Alternative Site Assessment the agricultural land quality. This is considered to be a significant oversight and contrary to the NPPF (Feb 2019). This raises further doubts about the robustness of the applicants' sequential assessment.

Paragraph 170 of the NPPF 170 states 'Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland’.

1.10 Ecology and Nature Conservation

1.10.6 Paragraph 10.222 states that the loss of semi-natural and managed farmland across the site would have an adverse effect and result in the loss of ecosystem integrity, but paragraph 10.390 states that the “retention of habitat, creation of new habitat and enhancement of existing habitat will offset the habitat lost with respect to woodlands, hedgerows, woodland, semi-improved grassland and open water” but omits reference to semi-natural and managed farmland.

RESPONSE

Simply transplanting a habitat is not straightforward and although visually pleasing, the moment you dig deep into the soil and start cutting down trees, decades, if not centuries, of developed ecosystems are being destroyed.

The proposed development is an important wildlife corridor which provides woodland.farmland access from Cannock Chase and rural parts of the West Midlands into Shropshire.

1.12 Landscape and Visual Effects

1.12.2 Paragraphs 12.87 and 12.88, dealing with Historic Landscape Character, make no reference to the role of hedgerows, and particularly the important hedgerows, in defining that historic character.

RESPONSE

Ref (Historic Environment Character Assessment South Staffs 2011)

The landscape of South Staffordshire is defined by its historic character which is dominated by a variety of field systems, primarily enclosed by hedges, some of which originate in the medieval and/or post medieval period. Woodland and settlement, comprising dispersed historic farms and cottages and villages both ancient and new, also make significant contributes to its historic character.

Beyond the extent of the built areas, historic field patterns associated with narrow winding lanes also survive. The majority of these fields are enclosed by mature hedgerows and in-hedge trees all of which contribute to the historic landscape character. Many of the extant field patterns within the project areas have their

origins as medieval arable fields most of which were enclosed piecemeal in the 16th to early 18th centuries. Even where there has been extensive 20th and 21st century change has occurred there are often historic assets including specific historic field boundaries, which contribute to the local character and which are also deserving of consideration within any future change.

There are 19 Conservation Areas: Including Brewood, Chillington, Penkridge, Shropshire Union Canal, Staffordshire and Worcestershire Canal, Weston-Under-Lizard, Wheaton Aston, The Woodlands (NNN jointly with the Vicarage Road Conservation Area of Wolverhampton City Council). Where there is a potential for a development to impact upon the Conservation Areas or their setting then SSC's Conservation Officer should be consulted.

See Map 4 in the above referenced report Prehistoric and Roman sites and finds from the Staffordshire HER as at December 2010. This map details Cropmark evidence (late prehistoric, late prehistoric to Roman, Roman, Undated.) Earthwork Evidence (Late Prehistoric, Roman, Roman or Medieval, Undated.) Archaeological Investigation (Late Prehistoric, Late Prehistoric to Roman, Roman, Undated.) Stray Finds and Walking Evidence (Prehistoric and Roman)

See Map 5 in the above referenced report showing conjectural extent of medieval forests across South Staffs. 2 of the forests were located at Brewood, & Cannock. Penkridge and Huntington were apparently not included in the disafforestation because they lay with Teddesley Hay. There were seven Hays within Cannock Forest in the mid 14th Century including Cheslyn Hay, Gailey Hay and Teddesley Hay.

Summary in above report – Historic Landscape

The conservation of the fabric of the historic landscape of South Staffs, including field boundaries, the settlement pattern and the winding lanes between settlements is desirable. The integrity of the historic landscape character and distinctiveness of the zone should be considered when planning the scale and relative density of any potential new development. The importance and respecting the local character of areas runs through NPPF.

Landscape

1.12.7 Paragraph 12.334 concludes that, when completed, the Proposed Development would have a minor adverse effect on the landscape character of the Cannock Chase AONB but a number of RR's express concern about the effect on the AONB, particularly in views from Shoal Hill.

RESPONSE

(i) *Effects from views on Shoal Hill –*

Ref: Cannockchasedc.gov.uk South and West Cannock character description
https://www.cannockchasedc.gov.uk/sites/default/files/character_area_descriptions_and_district_profilesouthandwes.pdf

Based on the design principles listed below, the development in the groups opinion would form a new and separate element in that view.

<p><u>Key Features:</u></p> <ul style="list-style-type: none"> Historically area comprised farmland leading westwards to the heathland of Shoal Hill. Adjoins Green Belt land to the west, bordering South Staffs. Landscape character consists of Settled Farmlands and Heathland at Shoal Hill (to the north west). Shoal Hill is key recreational and beauty spot defining character of western area. Large detached dwellings developed incrementally on landscaped plots along road frontages in west/south-west at first, then more extensively during 20th century. Detached houses and bungalows in well landscaped gardens still a feature of area today, set back from main road with relatively large front gardens. Extensive mature trees/ tree groups, many protected by Tree Preservation Order., in western part around New and Old Penkridge Roads which together with garden hedging, significantly contribute to “leafy” character. Housing is varied in style consisting of “bespoke” individual properties with own detailing and form. Scale and density of properties provides consistency and soft landscaping is a unifying feature. Denser development with semi-detached houses and terraces to the south of the town centre in late 19th/early 20th century, including former Cannock Workhouse (still standing along Wolverhampton Road), public houses (Listed 1930’s Crystal Fountain), schools (Listed former National School on New Penkridge Road) etc. Beyond, more 	<p>Key Local Design Principles or “New developments should”:</p> <ul style="list-style-type: none"> Safeguard/enhance “leafy character” of New Penkridge Road area with density of development, “green” views over and between buildings and householder “permitted development” rights controlled as appropriate. Promote retention and use of front garden boundary hedging to reinforce “leafy” feel. Recognise scope for variety of good quality design and materials through area whilst respecting scale/density of existing development and preserving /enhancing locally distinctive features and detailing. Take opportunities for enhancement of main road corridors through area with new tree planting and environmental improvements and respect and reinforce building lines helping to define historic routes eg Old Penkridge Road. Buffer impact of the urban edges upon the surrounding landscape character with planting and promote pedestrian links to Shoal Hill. Respect and enhance the forms of historic farmsteads in their landscape context. <p>Further Information:</p> <p>See character types description for further information on the built character and detailing.</p> <p>Cannock EUS (2009/10)- HUCAs 7,11,12,14,18,19</p> <p>Cannock Chase Local List</p>
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extensive suburban interwar and post-war estate development of semi-detached and smaller detached housing around circuitous road layouts, typical of its era.

Homogenous character within estates, however, there is a variety between them. Bungalows a distinct feature in the southern area. Largely medium density and red/buff brick with render and brown/grey tiles.

- *Larger scale modern retail and leisure development and car parks close to town centre including new avenue tree planting and landscaping. Several primary and secondary routes into the town centre cross this area and key “gateway” to District at Longford Island on A5.*

