

Planning Act 2008 – Section 88

and

The Infrastructure Planning (Examination Procedure) Rules 2010 –  
Rule 6

**Application by Four Ashes Limited for the West Midlands  
Interchange Strategic Rail Freight Interchange.**

**Written Representations following the Preliminary Meeting by  
Deadline 2**

**Subject of this Submission:**

**The Impact of the Proposals – including on the Green Belt**

**Campaign to Protect Rural England (Staffordshire Branch)**

**Inspectorate reference for this representee: 20015574**

## ***CPRE (Staffordshire) views***

### **Green Belt**

Our views

We consider that Green Belts are designated for five purposes: to

1. Prevent urban sprawl
2. Prevent the joining together of major towns and cities
3. Protect the setting of historic towns
4. Assist in protecting the countryside from encroachment
5. Encourage urban regeneration

We think that Green Belts help urban populations access the countryside by maintaining attractive landscapes for outdoor recreation near where people live.

Key strengths common to most Green Belts is the condition of woodland and land managed for wildlife; key concerns generally relate to the condition of historic features and field boundaries, such as hedgerows.

We consider that the application proposals would have a dramatic and undesirable impact on the Green Belt.

### **The Site**

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 around the northern part and the boundary of the site, with further farming and residential properties positioned around or close to the site boundaries.

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. The character of the site is also affected by the influence of features surrounding and crossing the Site including the canal, railway, roads and dwellings, and the industrial area of Four Ashes.

### **The application**

The application confirms that a number of significant adverse temporary effects have been identified on visual receptors during construction, notably Minor/Moderate to Major adverse effects on certain properties within view of the proposals, and Moderate to Major adverse effects on the canal towpath and Calf Heath reservoir

The applicants also acknowledge that the development will give rise to significant landscape effects (moderate to adverse) and result in significant visual impacts during construction and operation but that effects will reduce as new planting matures. The changing character of the site will have a significant effect on the existing openness of the Green Belt.

### **Our views**

We think that the existing characteristics of the site would be totally changed, the scheme would virtually eliminate existing hedgerows and mean the loss of almost all of the trees on the site. The landscape would be radically transformed by earthworks and enormous new buildings.

There is a significant level change between the West Coast Main Line and the surrounding site area. Gaining suitable rail access will therefore require significant levelling works to be undertaken.

The development would have a major visual impact from the M6, A5 and A449 and would transform the character of the area from rural to urban. Whilst peripheral mounding and planting may soften the edges it will not negate the major impact of buildings of heights between 20 and 30 metres.

The buildings will be visible from a considerable distance and, in reality, the tree planting will never reach a scale which would adequately screen the mass or height of the buildings.

The lighting, advertisements, noise and general level activity on the site will also transform the character of the area; particularly for residents. The new buildings would be particularly noticeable from the existing residential properties within and adjacent to the site. (Existing residential properties are located along Croft Lane and the A590 around the northern part of the site, with a number of other farming and residential properties positioned around or close to the site boundaries.)

### **Site Area and Definition**

According to the applicants calculations the site is approximately 297ha almost 3 square kilometres. We have not found an explanation or justification for the size and scale of development although we accept that it may be related to the land ownership of one of the parties.

### **Our views**

We are aware that Government Guidance in the NPSNN does not specify a maximum size for a site for a warehousing proposal related to an RFI. We also accept that there is no requirement in the guidance for an 'objectively assessed need' test. We know that we are not allowed to criticise the blatant deficiencies of NPSNN – and that these may not be commented on or taken into account by the Examining Authority; but think the issue to be very relevant and we remain extremely concerned as to the current scale of the proposals in the Green Belt – which seem to be based on 'permit it and firms will come', because of the road links not the RFI.

*Note:-We recognise and welcome the matters raised by the Examining Authority's written questions and requests for information (ExQ1)<sup>1</sup> Issued on 4*

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<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000584-First\\_ExQs.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000584-First_ExQs.pdf)

*March 2019 Section 2.1 - questions 2.1.1 to 2.1.6 which are directly relevant to this issue.*

We are particularly unhappy that part of the site now extends in a southerly direction beyond Vicarage Road - which we consider to be opening up an area of land not defined by other traditional boundaries and to be wholly unjustified and unwarranted. (We also have other concerns about the use of Vicarage Road rather than from the new junctions to the A5 and A449.)

We see this as a free-standing site outside the urban area of the West Midlands conurbation. We recognise, however, that it is likely to attract existing firms to leave the conurbation, which has already experienced economic decline whilst adding to the regeneration problems which are already being experienced.

Re-location of existing firms would also cause longer work journeys for residents of the West Midlands conurbation; these journeys are forecast to overwhelmingly be by car.

#### **Other issues**

We recognise that there are concerns related to a number of other issues such as Cultural Heritage, Noise Impact, Air Quality, Biodiversity, Flooding etc.

#### **Our views**

We do not wish to comment on these issues as we think that they are being appropriately covered in more detail by both by other, more knowledgeable, representees and the questions of the ExA.