STATEMENT OF COMMON GROUND

for

WEST MIDLANDS INTERCHANGE

on

PLANNING CONTEXT & ALTERNATIVE SITES ASSESSMENT

between

FOUR ASHES LIMITED

and

SOUTH STAFFORDSHIRE DISTRICT COUNCIL

1. Introduction

1.1. This Statement of Common Ground ('SoCG') has been prepared in respect of Four Ashes Limited's ('FAL' or 'the Applicant') application for a Development Consent Order ('DCO') for the West Midlands Interchange ('WMI') project under the Planning Act 2008.

1.2. This SoCG with South Staffordshire District Council ('SSDC') is a means of clearly identifying areas of agreement and disagreement between the two parties in relation to the Application.

1.3. Matters "***agreed***" between the Applicant and SSDC are set out in Sections 1 – 15 of the SoCG.

1.4. The preparation of the SoCG is iterative and matters that are still between the two parties will be the subject of ongoing discussions wherever possible to resolve, or refine, the extent of agreement / disagreement between the two parties, with the SoCG to be refreshed ahead of submission.

1.5. In line with PINS Guidance Note 15 (Drafting Development Consent Orders), SSDC are content with the role of approving / discharging details under the DCO requirements, given to them through the DCO.

1.6. This SoCG is structured under the following sections:

1. Introduction
2. Project Background
3. Site Description and Context
4. Description of Development
5. National Policy Context
6. Role of Regional and Local Policy
7. Historic Context of the need for a Regional Logistics Site / Strategic Rail Freight Interchange
8. Shortage of Rail-Served Warehouses / Land in the Region
9. Alternative Sites Assessment
10. Green Belt
11. Scale of Development
12. Economy
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14. Noise
15. Air Quality

2. Project Background

2.1. FAL has made an application to the Secretary of State ('SoS') via the Planning Inspectorate ('PINS') for a development consent order ('DCO') under the Planning Act 2008 for the development of a new strategic rail freight interchange ('SRFI'), to be known as West Midlands Interchange ('WMI')

2.2. A strategic rail freight interchange is a large multi-purpose rail freight interchange and distribution centre linked into both the rail and trunk road system. It has rail-served warehousing and container handling facilities and may also include manufacturing and processing activities.

2.3. The Parameters Plans [Documents 2.5 – 2.7] provide a suitable framework, including limitations and constraints, for defining the scale of the Proposed Development, to fix the location of key infrastructure, including landscaping and earthworks and to enable its effects to be appropriately assessed within the Environmental Statement.

3. Site Description and Context

3.1. The Site comprises approximately 300 hectares ('ha') of land.

3.2. The Site is located in the West Midlands region of England, one of the nine official regions of England.

3.3. The Site, located at Four Ashes, Staffordshire, is approximately 10km north of Wolverhampton and lies immediately west of Junction 12 of the M6.

3.4. The Site is broadly bounded by the A5 trunk road to the north (from Junction 12 to the Gailey Roundabout); Calf Heath reservoir, the M6, Stable Lane and Woodlands Lane to the east; Station Drive, Straight Mile and Woodlands Lane to the south; and the A449 trunk road (Stafford Road), from the Gailey Roundabout to Station Drive to the west. The south-eastern area of the Site is bisected by Vicarage Road.

3.5. The Site is characterised by a mix of uses including a large area of sand and gravel mineral extraction within the east known as Calf Heath Quarry and a patchwork of agricultural fields with hedgerows and trees to the west and south of this, with an area of mixed woodland known as Calf Heath Wood in the centre of the Site.

3.6. The Staffordshire and Worcestershire Canal ('the Canal') runs roughly north to south through the western part of the Site. The West Coast Main Line ('WCML') runs north to south through the Site, near the western edge.

3.7. Public access to the Site is limited.

3.8. The surrounding area is characterised by a mixture of agricultural fields and employment uses. Calf Heath Reservoir is located adjacent to the north-eastern Site boundary and the area south of Vicarage Road is made up of agricultural fields with trees and hedgerows.

3.9. The large chemical works operated by SI Group is located between the western and eastern sections of the Site. The chemical works does not form part of the Site.

3.10. Detailed planning approval (16/00498/FUL) was granted in 2016 for development on land between the chemical works and the east section of the Site, referred to below as the 'Bericote Site'.

3.11. The approval at the Bericote Site (25.7ha) is for the erection of four industrial/distribution buildings (uses B1(c)/B2/B8), totalling approximately 1.35m sq ft, along with access and servicing arrangements, car parking, landscaping and associated works.

3.12. The first building at the Bericote Site, totalling approximately 550,000 sq ft, has been built and is currently being fitted out

3.13. Access to the Bericote Site is via Gravelly Way, with works completed to upgrade the road in September 2017. The upgrade was funded by an allocation from the Stoke and Staffordshire Local Enterprise Partnership (LEP) Local Growth Fund. The money allocated totalled £1.91m and provided (inter alia) a full access signalised junction on the A449, resurfacing of Gravelly Way and a new access arm from the existing mini roundabout.

3.14. The existing Four Ashes Industrial Estate is located adjacent to the southern Site boundary. The Veolia energy recovery facility is located south of the Site

3.15. A small number of residential properties in close proximity to the Site are located along the A5 to the north of the Site, at Croft Lane and along Station Drive and Vicarage Road

3.16. The Site is designated as West Midlands Metropolitan Green Belt (the 'Green Belt')

3.17. The Site equates to 0.1% of the West Midlands Metropolitan Green Belt or less than 1% of the West Midlands Metropolitan Green Belt in the SSDC Core Strategy.

3.18. There are no international or national designated sites for nature conservation located within or directly adjacent to the site. There is a Site of Special Scientific Interest ('SSSI') located approximately 140 m south of the Site. The SSSI is designated for its geological value.

3.19. There are no Special Protection Areas ('SPAs') or Ramsar Sites within 10km of the site.

3.20. Historic features associated with the Canal are located within or near the Site. These comprise the Canal itself (which is a Conservation Area), 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.

3.21. Saredon Brook is situated approximately 450 m to the south of the Site and flows in a broadly east-west direction. It joins with the River Penk approximately 1.2 km south-west of the Site. The River Penk is situated approximately 1.2 km south-west of the Site at its closest point, although it is generally situated approximately 1.5 km to the west of the Site, and flows broadly in south-north direction.

3.22. The strategic road links within the surrounding area include the A5 directly to the north of the Site; the M6 motorway to the east running north/south and the M6 toll road approximately 2 km south-east of the Site; the M54 approximately 4 km to the south of the Site; and the A449 directly to the west of the Site.

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

3.24. A full planning history for the Site and its immediate surroundings is available under Appendix 3 of the Planning Statement [Document 7.1A].

4. Description Of Development

4.1. The Proposed Development, in summary, comprises:

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

4.2. The main components of the application summarised above are described in detail in paragraphs 3.5.7 – 3.5.36 of the Planning Statement [Document 7.1A].

4.3. A 'Parameters Approach' has been applied to the Proposed Development whereby the development is expressed in terms of an upper limit of clearly defined parameters within which future design development will be undertaken.

4.4. 36% of the Order Limits (108ha) would be delivered as 'Green Infrastructure', with the built development and associated infrastructure accounting for 64% of the WMI Site (192ha).

4.5. The development area to the south of Vicarage Road measures 47ha, which represents 16% of the Order Limits. 29ha of this area (or 61%) would be delivered as 'Green Infrastructure'.

5. National Policy Context

5.1. WMI is classified as 'Nationally Significant Infrastructure Project' (or 'NSIP') and, therefore, under Section 104 of the Planning Act 2008, must be determined in accordance with the relevant National Policy Statement, which in this case is the National Policy Statement for National Networks (December 2014) ('the NPS'), except in limited specific circumstances. See the Planning Statement [Document 7.1A] for further details

5.2. The National Policy Statement for National Networks (NPS), published in December 2014 (and designated by the SoS on 14 January 2015), sets out the overarching policy position. Paragraphs 1.17 to 1.20 of the NPS make clear that while the overall strategic aims of the National Planning Policy Framework ('NPPF') and NPS are consistent, the two documents have differing roles to play. The NPPF may be an important and relevant consideration in decisions on NSIPs, but "***only to the extent relevant to that project***" (paragraph 1.18).

5.3. The proposed WMI site is consistent with the broad locational requirements of the NPS, which requires SRFIs to be located alongside the major rail routes, close to major trunk roads, as well as near to the conurbations that consume the goods (NPS paragraph 2.45)

5.4. The NPS establishes the need for SRFIs, stating at paragraph 2.56 that "***the Government has concluded that there is a compelling need for an expanded network of SRFIs***".

5.5. The Government published the revised NPPF on 24 July 2018. The NPPF (2018) contains considerations relevant in the determination a DCO application, including at paragraphs 5, 6, 82, 104 (e), 107 and 175 (c).

6. Role of Development Plan Policy

6.1. There is no statutory requirement for the decision maker of a DCO to attach weight to development plan policy. Development plan policy can be ***"important and relevant"*** (Planning Act 2008 – 104 (2)(d)) to the determination of a DCO, but the weight attached to it is likely to depend upon its consistency with the policies of the NPS

6.2. The current Development Plan for South Staffordshire consists of:

- The South Staffordshire Core Strategy Development Plan Document (2012);
- The SSDC Site Allocations Document (SAD) (2018);
- The Minerals Local Plan for Staffordshire (2015-2030) (2017); and
- The Staffordshire and Stoke-on-Trent Joint Waste Local Plan (2010-2026) (2013).

6.3. Another document that is a material consideration for Town and Country Planning Act applications in South Staffordshire and that may be important and relevant to the determination of this development consent application is:

- The South Staffordshire Green Belt and Open Countryside SPD (2014).

6.4. SSDC held a consultation for the Issues and Options stage of their Local Plan review from 08 October 2018 to 30 November 2018. The timetable for the Local Plan review indicates that the Preferred Options stage will be undertaken in Spring 2020, when the outcome of the WMI DCO application is anticipated to be understood.

6.5. The Planning Statement [7.1A] provides a robust, fair and detailed assessment of the development plan policy context for the WMI proposals.

7. Historic context of the need for a Regional Logistics Site / Strategic Rail Freight Interchange

7.1. The need for a RLS facility was identified in 2004 in the West Midlands Regional Spatial Strategy and confirmed in the South Staffordshire Core Strategy (2012), which states "***the Council accepts that the RLS issue remains outstanding and that a comprehensive study should now be set in train***" and that there is a need for such a facility to serve the needs of the Black Country and southern Staffordshire in the West Midlands .

7.2. Whilst former regional planning policy has no status in planning terms (following revocation of the former RSS in 2013), the history of that policy (and the evidence that underpinned its formulation) is relevant in documenting the long term identification of the need for new rail freight facilities to serve the area.

2004

7.3. The regional evidence base identifying the need for a new RLS in the West Midlands region goes back as far as 2004, when, the West Midlands Regional Logistics Study Stage One (2004) identified the "***North Black Country/South Staffordshire***" area as one of the best sub-regional locations for a RLS in the West Midlands. RLS were considered as requiring existing or potential dedicated rail access to freight routes with at least W8 loading gauge and close proximity to a junction that could provide access to the Strategic Road Network ('SRN') or other principal roads.

7.4. The West Midlands Regional Logistics Study Stage One identified the "***Wolverhampton to Penkridge rail corridor - the area to the north of Wolverhampton covering the Wolverhampton to Stafford railway line corridor between Wolverhampton and Penkridge (W10 loading gauge), an area served by the M6, M54 and M6 Toll***", in particular, as one of the "***best regional logistics locations***" within the potential areas "***appropriate for supporting Regional Logistics Sites***".

2004 – 2008

7.5. The Regional Spatial Strategy for the West Midlands (2004 / 2008) Policy PA9 promoted the development of RLSs at key logistics locations across the region. The policy stated that "***provision should be made for Regional Logistics Sites***", that should generally "***be served or proposed to be served by multi-modal transport facilities***" and that "***the Region should have a choice of RLS available at any point in time***".

2009 – 2011

7.6. An update to the West Midlands Regional Logistics Study was published in May 2009 to inform a revised West Midlands Regional Spatial Strategy. The study estimated that there was a "***shortfall of between 213ha and 345ha of land***

required at RLSs by 2026", concluding that new rail-linked RLSs would need to be brought forward in the long term to cater for the full scale of this requirement.

7.7. The revised West Midlands Regional Spatial Strategy (2009) was published for examination, amending Policy PA9 to state that consideration and priority should be given to bringing forward additional land for (inter alia):

"***Potential for new rail-served facilities to serve (a) the needs of the Black Country located in southern Staffordshire and (b) to serve the North Staffordshire conurbation***."

7.8. The Panel Report (2009) on the West Midlands Regional Spatial Strategy revision was supportive of the concept of RLS provision, and recommended that such provision should be rail served. The panel report suggested amendments to Policy PA9 to the effect that "***at least 150ha***" of land for RLS-type locations should be replaced with "***at least 200-250ha***", consistent with the output from the updated West Midlands Regional Logistics Study. The Panel Report further stated at paragraph 5.29 that:

"***Priority attention must therefore be directed to securing provision to the north of the conurbation to serve the Black Country and southern Staffordshire as it is that area that is identified in the Preferred Option as in most urgent need***."

7.9. The Panel Report (2009) suggested that the potential for the expansion of the existing RLS at Hams Hall, Birch Coppice and Hortonwood (Telford) should also be considered and that "***possibilities to be explored for provision of RLS include Brinsford, Four Ashes, Cannock, Fradley and Meaford***".

7.10. Whilst the Regional Spatial Strategies were subsequently revoked before the 2009 West Midlands Regional Spatial Strategy could be adopted the supporting evidence base documents provide evidence of the recognised and unmet need for two RLS in Staffordshire, with the most urgent need being identified for a RLS to serve southern Staffordshire and the Black Country

<u>2011 onwards</u>

7.11. No appropriate RLS sites were identified through the Joint Black Country (2011) or SSDC's Core Strategy (2012) or draft Site Allocation Document (2017).

7.12. The SSDC Core Strategy recognises employment cross-boundary issues (SSDC Core Strategy paragraph 3.2), and the requirement to consider if a RLS is needed in light of the West Midlands Regional Spatial Strategy evidence base at paragraph 9.11:

"***The Council accepts that the RLS issue remains outstanding and that a comprehensive study should now be set in train***"

7.13. In June 2012, a number of local authorities in the Black Country and Staffordshire commissioned URS to consider the need for regional logistics provision to serve

the Black Country and southern Staffordshire; and, dependent on the findings, make recommendations for a suitable location.

7.14. The study noted in the Executive Summary that "***for the purposes of this study a SRFI is broadly consistent with the definition of a RLS***". It goes on to state that:

"***The concept of SRFIs to integrate rail with logistics delivery was developed to overcome the economic and operational disadvantages of using rail and the disadvantages of conventional rail terminals and onwards delivery. It is therefore considered that seeking to provide for a RLS through a hub and spoke approach is not feasible or deliverable***."

7.15. Stage 1 of the study concluded that:

7.16. "***there is a need for a RLS facility that can serve the Black Country and southern Staffordshire, but only insofar as they form part of the wider West Midlands which taken as a region has a need***".

7.17. Any suggestion that the need could be met by a facility remote from the Black Country and southern Staffordshire is now inconsistent with the requirement in the NPS that SRFIs "***should be located close to the business markets they are intended to serve***" (NPS paragraph 2.56).

7.18. The URS Study reviewed the conclusions of the West Midlands Regional Spatial Strategy Panel Report (2009) that "***at least 200-250 ha***" of RLS land should be provided for and concluded that the previously derived figure from the Regional Logistics Study Update (2009) of 200-250 ha "***holds good***".

7.19. The URS Study notes the "***over development***" of the region around Hams Hall and Birch Coppice for logistics land, and that "***other regeneration initiatives now have to take priority***". The study further considered that Hortonwood (Telford) could not meet the RLS needs of the West Midlands, due to its location and expansion capacity.

7.20. In a report from the Director (Planning and Strategic Services) of South Staffordshire Council to the Staffordshire and Stoke-on-Trent Planning Forum of 28 February 2013, the Director confirmed SSDC's agreement that with regard to how much RLS land is required:

- "***Previously derived figure from the Regional Logistics Study Update 2009 of 200 to 250 hectares holds good.***
- ***Previous research suggested RLS provision at several locations.***
- ***Practically no reason why provision could not be made on two or even one large site***."

7.21. Employment land requirements were further considered in a two stage sub regional, High Quality Employment Land Study, commissioned by South

Staffordshire District Council, the four Black Country Authorities (Wolverhampton City Council, Walsall MBC, Dudley MBC, Sandwell MBC) and Staffordshire County Council, with the first stage published in November 2014 and the second stage published in August 2015. Both reports confirmed an undersupply of employment land across the study area, but neither report addressed the RLS / SRFI issue.

7.22. The National Policy Statement for National Networks (NPS), published in December 2014 (and designated by the SoS on 14 January 2015), set out the overarching policy position for SRFIs.

7.23. The West Midlands Strategic Employment Sites Study was published in September 2015, intended as Phase 1 of a larger study. Like its predecessors, this study, undertaken by PBA and JLL, identified that the West Midlands is severely short of large industrial sites, including for RLS (or SRFI).

7.24. Apart from WMI, there are no known sites being promoted for a SRFI in the ASA search area (defined at paragraph 9.3 of this SoCG).

7.25. The identified need for a RLS / SRFI in the West Midlands, to serve the Black Country and southern Staffordshire, therefore, remains outstanding.

8. Shortage of Rail-Served Warehouses / Land in the Region

8.1. The West Midlands region is experiencing very high demand from both the logistics and manufacturing sectors, which is culminating in a critical shortage of employment land and premises.

8.2. As stated in the WMI Market Assessment as at 2018 [Document 7.4], there is just 191,200 sq. m (c. 2 million sq. ft) of warehouse floorspace available in the market area, which equates to 0.8 years' supply. In contrast to the level and nature of demand, the majority of this supply is of lower quality and relatively small in size, with a severe shortage of the higher quality, large scale strategic sites and larger units.

8.3. There are no rail-linked or rail-served sites or 'big shed' warehouses available in the market area.

8.4. The increasing shortage of floorspace means that it is vitally important that additional, well-located and rail-served sites, which are capable of accommodating larger units, are brought forward in order to help meet demand and deliver high quality floorspace via either speculative development or by offering occupiers build to suit opportunities.

8.5. The emerging Black Country Core Strategy evidence base considers the contribution to be made to supply by other emerging developments, including in South Staffordshire, for industrial land (B1c/B2 and B8).

8.6. The Black Country Economic Development Needs Assessment (May 2017) states at paragraphs 8.4 and 8.5, respectively, that:

"the overall gap between supply and demand for industrial land in the Black Country taking into consideration potential contribution to be made by other available land including in South Staffordshire [...] [which would be] circa 450 ha (and potentially 350 ha if the future contribution of Four Ashes [WMI] is taken into account)."

"The currently estimated additional supply of industrial land (including in South Staffordshire) that could contribute to meeting demand in the Black Country is estimated to include [...] Four Ashes West Midlands Interchange – a proportion of the 270 ha (emerging infrastructure proposal), would potentially contribute to meeting the needs / jobs for the Black Country."

8.7. The Black Country EDNA (May 2017) has concluded that there is a critical shortage of land in this area and WMI would make a valuable contribution to the supply of sites currently available and in the pipeline.

8.8. The WMI Market Assessment 2018 prepared by Savills [Document 7.4] provides a robust, fair and detailed assessment of the dynamics of the distribution market,

assessing the demand for, and supply of, warehouse floorspace, and the supply of land which might be available in the context of the proposed WMI market area.

9. Alternative Sites Assessment

9.1. The Alternative Site Assessment ('ASA') undertaken by FAL investigates the availability of potential alternative sites that could provide a SRFI

9.2. The approach and methodology taken by the Applicant to the ASA, reviewing and taking direction from previous assessment that have been through the planning process, is appropriate

9.3. The ASA search area (Appendices 5 and 6 of the Planning Statement [Document 7.1A]) represents the area within which a need exists for a new SRFI facility and within which it is appropriate to search for sites that could potentially meet that need

9.4. Sites which are located in the northern extremity of the search area would be less able to efficiently and sustainably meet the demands of southern Staffordshire, the Black Country conurbation and the West Midlands conurbation

9.5. Sites which are located beyond the search area are not considered suitable alternatives as they would serve a different catchment area and would not meet the demands of southern Staffordshire, the Black Country conurbation and the West Midlands conurbation. Therefore, sites beyond the search area have been discounted

9.6. Given SRFI's specific locational requirements and the need for effective connections for both rail and road, it is only appropriate to consider sites which are within 5km from a motorway junction or a road of near motorway standard and within 5km from a railway line of a minimum of gauge W8

9.7. Given the established built-up nature of the Black Country, there are no sites within the Black Country of a sufficient size to potentially accommodate a SRFI. This was established in the Black Country Core Strategy (2011) and is again confirmed in the evidence base for the emerging Black Country Core Strategy

9.8. The following sites are the only potential alternative sites in the search area which are worthy of further considerations:

- Meaford Power Station
- Mid Cannock Colliery
- ROF Featherstone
- Rugeley Power Station
- Dunston
- Creswell
- Stafford West

- The WMI Site

9.9. The ASA provides an accurate and fair assessment of the availability and suitability of sites within the search area, using appropriate assessment criteria

9.10. The ASA evidence provided by the applicant (Four Ashes Ltd) has demonstrated that there is no alternative site for a SRFI (within the identified area of search) that offers a viable alternative that better meets the locational criteria (as set out in the National Networks NPS) than the Proposed Development. Accordingly, it is the case that the Proposed Development should be considered on its individual merits against the policies set out in the National Networks NPS and any other relevant considerations set out in the National Planning Policy Framework (NPPF).

10. Green Belt

10.1. Paragraph 5.178 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.

10.2. 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.

10.3. The NPS recognises that sites suitable for SRFI development may only be available in the Green Belt. Specifically, that ***"promoters of strategic rail freight interchanges may find that the only viable sites for meeting the need for regional strategic rail freight interchanges are on Green Belt land"*** (paragraph 5.172).

10.4. The specific locational and operations characteristics of a nationally important infrastructure project, which cannot normally be accommodated within urban areas, can lead to the acceptance of very special circumstances for SRFI developments, such as at Radlett, Doncaster and at Howbury Park, London.

10.5. The concept of a Green Belt around Birmingham and the Black Country first appeared in the 1948 Regional Study ***"Conurbation - A Planning Survey of Birmingham and the Black Country"***. A Green Belt was then defined and sanctioned in Circular 42/55 to inform proposed amendments to development plans. The Green Belt's status remained as 'proposed' for twenty years (although the Circular's policies were applied largely as if they were approved) until 1975 when the SoS formally approved the West Midlands Green Belt. Green Belt boundaries are now being progressively reviewed through local plans across the region, through local plan reviews.

10.6. The Green Belt boundaries in South Staffordshire were last fully reviewed in 1996.

10.7. Birmingham City Council (who had a holding objection on their Local Plan lifted by the SoS in November 2016authorising the release of 2 significant Green Belt sites - one housing and one employment) adopted the Birmingham Development Plan ('BDP') in January 2017 The principal release (near Sutton Coldfield bypass) will accommodate up to 6,000 new homes and 71ha of employment land

10.8. The 14 local planning authority's ('LPAs') across the Greater Birmingham Housing Market Area ('GBHMA') commissioned GL Hearn/Wood to produce a Strategic Growth Study ('SGS') to identify potential strategic locations for growth across the GBHMA. The SGS was published on 21 February 2018 and included an update on the housing shortfall (previously evidenced by the Peter Brett Study 2015).

10.9. The SGS 2018 found there is a need for additional land for residential development to be identified to meet development needs in the GBHMA to 2031 and 2036. The SGS considers that a range of small and medium-sized development schemes of up to 2,500 homes, will make a principal contribution to this as well as other smaller scale development opportunities. This is likely to include a need for such sites both within and beyond the Green Belt.

10.10. Local authorities to the south east of the West Midlands conurbation (North Warwickshire, Nuneaton & Bedworth, Rugby, Coventry, Warwick and Stratford-on-Avon) are relying on Green Belt release to address their housing and employment needs and the shortfall that cannot be met by Coventry City Council. Coventry has identified capacity to accommodate only approximately half of its housing and employment needs and a Memorandum of Understanding has been agreed with some authorities to address the deficit . Even accounting for this deficit, Coventry City Council is still proposing the release of 16 Green Belt sites to accommodate some of its needs.

10.11. Comparable issues arise regarding the shortfall of employment sites all across the West Midlands area

10.12. The The West Midlands Combined Authority ('WCMA') commissioned the West Midlands Land Commission to take a fresh look at the West Midlands land supply and consider what measures could be initiated to ensure an improved supply of developable land. The WMLC's Final Report identified the shortage of available land to meet forecast economic requirements and proposed six "***game changers***" for the land market to address the shortage, one of which was a "***Strategic Review of the Green Belt***". The Report noted that there is not a single developable site in the Combined Authority area in excess of 25 hectares that meets the needs of a potential major employer.

10.13. It is acknowledged in the Black Country Core Strategy Inspector's report (2010) that the local authorities (Dudley, Sandwell, Walsall and Wolverhampton) who sought to prepare the joint Black Country Core Strategy (adopted in February 2011) could not meet their employment needs and did not have a site of a size necessary to accommodate an RLS.

10.14. Similar issues arise in South Staffordshire. In his consideration of the South Staffordshire Core Strategy in October 2012, the Inspector recognised that many of the District's settlements were defined by "***quite tightly drawn Green Belt boundaries***" (paragraph 13) and that the Core Strategy itself must identify the need for a review of Green Belt boundaries. The Inspector's conclusions included the following:

> "***I firmly concur that the delivery of the plan and its strategy for growth depends on reviewing the Green Belt. In this context, the CS would be fatally flawed if it did not plan for such a review.***

To my mind, the necessity for a Green Belt review is a fundamental issue. That the CS effectively defers the review to the emerging Site Allocations DPD is less than ideal. While this does not in itself render the CS unsound, it is imperative that the CS sets in place a robust framework for the review. This is essential for the Plan's effectiveness. In essence, the CS must set clear parameters to steer the preparation of the Site Allocations DPD. The submission version of the CS is inadequate in this regard, particularly in that it provides no meaningful policy to direct the site selection process"

10.15. The adopted terms of Core Policy 1 of the Core Strategy provide that a partial review of Green Belt boundaries will be carried out through the Site Allocations DPD. Core Strategy paragraph 6.14 confirms that some land will need to be released from the Green Belt and Open Countryside in some locations, including "modest extensions" to the four existing free-standing strategic employment sites (i54 Hilton Cross, ROF Featherstone / Brinsford and Four Ashes) to accommodate justified development needs.

10.16. The SAD submitted for examination in September 2017 is consistent with the requirements of the Core Strategy and promotes 25 revisions to Green Belt boundaries in order to meet housing and employment needs.

10.17. The SSDC Core Strategy recognises that there is "***no alternative***" (paragraph 6.20) but to alter the boundaries of the Green Belt to meet housing and employment needs, including employment needs that cannot be met in the Black Country, with the Black Country EDNA (2017) noting at paragraph 8.2 that "***there is projected to be an undersupply of industrial land up to 2036 [in the Black Country] of up to 537ha***". Industrial land is defined in the report as B1c / B2 Light and B8 uses

10.18. However, neither the SSDC Core Strategy (2012) nor the emerging SAD (2017) address the outstanding need for a large scale RLS / SRFI. The outstanding need was recognised directly in the Inspector's Core Strategy Report (2012) at paragraphs 65 and 66 which provided:

"65. The RS Phase 2 Revision includes a policy relating to the provision of a RLS to serve the needs to the Black Country. Local authority areas within southern Staffordshire are identified within an area of search for the RLS. As submitted, the CS acknowledges the need for a comprehensive study to explore the alternatives, but does little to facilitate this or otherwise positively address the issue. The positive preparation of the CS is at issue here.

"66. However, the Council has put forward a modification on this point. New wording is proposed which recognises that Wolverhampton City Council has agreed to lead on joint working with the other Councils involved. It also commits the Council to cooperating in this study and endeavouring to ensure that it is completed by the end of 2012. This is necessary for soundness, and the proposed

text goes as far as could reasonably be expected, given that this matter is not wholly in the Council's control."

10.19. The Core Strategy recognises this outstanding requirement at paragraphs 9.9 – 9.12. In particular, paragraph 9.11 states that "***the Council accepts that the RLS issue remains outstanding and that a comprehensive study should be set in train***". Paragraph 9.12 recognises that a RLS / SRFI would require a scale of development beyond the "***modest extension***":

"the Council recognises that, an RLS would require a scale of development beyond a modest extension of either ROF Featherstone/Brinsford or Four Ashes. It is also recognised that the refresh of the Employment Land Study (ELS) might demonstrate a pressing need for new employment sites in the District which would be contrary to the agreed Spatial Strategy. In order to provide flexibility if either of these events were to occur, the Council will carry out a partial review of the Core Strategy to take account of such changes. The provision of an RLS in South Staffordshire would need to be justified by robust and comprehensive evidence."

10.20. Given that the Core Strategy only allows for 'modest extensions', the outstanding need for a RLS / SRFI is not a matter which can be addressed in the SAD

10.21. This much is further confirmed within the submitted SAD which states at paragraph 9.31 that:

"It is recognised that the issue of an RLS/SRFI remains outstanding. However, it is also recognised that an RLS would require a scale of development beyond a 'modest extension' and therefore seeking to resolve this issue in the SAD would be contrary to the adopted Core Strategy and therefore will be considered in the Local Plan review."

10.22. Paragraph 6.15 of the submitted SAD confirms the expectation that a Local Plan review would be accompanied by a strategic Green Belt review

11. Scale of Development

11.1. The Planning Act 2008 specifies that Rail Freight Interchanges ('RFIs') must be at least 60 hectares in area and be capable of handling over 4 goods trains per day to be considered nationally significant

11.2. The WMI Site is approximately 297ha (including green infrastructure and landscaped areas) in area and is designed to be capable of handling up to 10 trains per day at maturity and is therefore a NSIP, as defined by Section 26 of the Planning Act 2008.

11.3. Two other SRFIs have come forward and have been consented under the DCO regime, Daventry International Rail Freight Interchange ('DIRFT') and East Midlands Gateway ('EMG'), both in the East Midlands

11.4. The DIRFT III extension is approximately 345ha in extent, expanding on the existing 178ha of the DIRFT I & II sites. DIRFT will subsequently total approximately 523ha. EMG is approximately 336ha in extent.

11.5. The PINS Programme of Projects, as of October 2017, has four SRFI projects in the pre-application stage. East Midlands Intermodal Park (East Midlands), Rail Central (East Midlands), Northampton Gateway Rail Freight Interchange (East Midlands) and West Midlands Interchange (West Midlands).

11.6. Table 4 (paragraph 2.55) of the NPS, acknowledges that reliance on smaller RFI terminals is neither viable nor desirable:

"***The increasing performance and efficiency required of our logistics system would not allow reliance on an expanded network of smaller terminals. While there is a place for local terminals, these cannot provide the scale economies, operating efficiencies and benefits of the related business facilities and linkages offered by SRFIs.***"

11.7. Table 4 (paragraph 2.55) of the NPS, also acknowledges that relying on existing RFIs is not an 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.***"

11.8. The development of SRFIs represents a major investment in infrastructure. WMI is infrastructure proposed to be funded by the private sector. SRFIs, particularly the rail connection and terminal, land and the build out have the potential to amount to "***many tens of millions of pounds***" and "***to justify such substantial***

investment there needs to be a large concentration of warehouses" (URS paragraph 3.1.16).

11.9. In order to maximise the economic potential of the logistics sector, it is vital for the property market to provide the appropriate accommodation to meet the needs of companies seeking efficiency in the scale and modal connection of their distribution requirements. Developers of distribution warehouses are increasingly having to respond to a more sophisticated and demanding client base, providing users with reliability and flexibility in their product. This is recognised in Table 4 (paragraph 2.55) of the NPS

11.10. In considering the scale of the development, it is apparent that the NPS attaches importance to realising the full benefits of nationally significant infrastructure projects and that calls to reduce the scale of a project should only be sanctioned in exceptional circumstances where a significant benefit would be derived with only a small reduction in scale or function. This much is set out at paragraph 5.159 of the NPS which provides:

"***Reducing the scale of a project or making changes to its operation can help to avoid or mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design or changing the operation of a proposed development may result in a significant operational constraint and reduction in function. There may, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in scale or function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape effects outweigh the marginal loss of scale or function.***"

12. Economy

12.1. WMI would deliver economic benefits for South Staffordshire & Staffordshire County.

12.2. WMI would make a contribution to the local, sub-regional and national economy.

12.3. The Statement of Economic Benefits submitted as part of the DCO application provides a suitable methodology and assessment for the estimates relating to construction activity, operational on-site activity and direct, indirect and induced gross value added.

12.4. WMI would create 8,550 jobs on-site, based on current best estimates. The employment multiplier for the operational phase would be 1.95 – so for every job created at WMI just under one additional job would be supported elsewhere in the wider economy. The total induced and indirect employment is expected to be 8,100 jobs in addition to the 8,550 on-site.

12.5. The on-site jobs at WMI would consist of a mix of entry level opportunities through to management, administrative and technical roles for senior and experienced candidates. The proposed scale of job creation and the skills mix of the new positions would be a good fit for the labour market within the Travel to Work Area ('TTWA').

12.6. There is a large pool of potential labour supply available at appropriate skill and occupation levels, which reinforced by an effective Employment, Skills and Training Plan, should support the scale of growth at WMI, including residents who are currently unemployed and those who are economically inactive but want a job

12.7. A Travel to Work Area (TTWA) is the zone from within which the vast majority of these 8,550 employees is expected to travel. Whilst a few employees may travel from beyond this area, it is expected that this TTWA is the outer limit for almost all employees to commute from. The extent of this TTWA is set out in Chapter 14: Socio-Economics of the ES and the West Midlands Interchange Labour Market Context Report (available as part of the S106). It can also be found in the transport technical notes.

12.8. The Gravity Model projects the relationship between where working age people live and the site. Areas close by to WMI with lots of people will provide more workers than areas further away and/or with relatively few residents.

12.9. Details of this methodology are set out in Transport Technical Note 14. This methodology has been agreed with Highways England and Staffordshire County Council in November 2016. South Staffordshire Council has been party to discussions on the TTWA.

12.10. Testing against existing travel plans and evidence from other similar sites demonstrates that the outcomes of the Gravity Model are plausible in terms of labour distribution.

12.11. As set out in the ESTP, there will be a particular focus on providing employment opportunities for people who live within 10 miles of WMI.

12.12. An Employment, Training and Skills Plans would aim to maximise the proportion of employees who come from within South Staffordshire District, Wolverhampton and Staffordshire County. As set out in the ESTP, there will be a particular focus on providing employment opportunities for people who live within 10 miles of WMI.

12.13. Construction would contribute to local employment and the strength of the local construction sector and supply chain. This investment would be sustained over a prolonged period of time (10 to 20 years). Construction jobs would be created. The construction of WMI is expected to support up to 4,550 person years of construction employment. Through the supply chain and construction wage injection, this would result in an additional 4,500 one year jobs created elsewhere in the economy

12.14. A substantial amount of business rates would be payable to the district and county authorities every year. Annual non-domestic rates payable are expected to be approximately £16.2m.

12.15. The Employment, Skills and Training Plan (ESTP) is acceptable, subject to the detail agreed in the S106.

13. Cumulative Effects Assessment

13.1. The Cumulative Effects Assessment, dated 08 November 2017, includes all developments in the defined Zone of Influence that may affect or be affected by the Proposed Development.

13.2. The methodology for the Cumulative Effects Assessment was agreed with SSDC.

13.3. Schemes included in the Cumulative Effects Assessment have been categorised in accordance with PINS advice note 17.

14. Noise

Introduction

14.1. The Applicant and SSDC have corresponded through the consultation period of the Application. This has shaped the technical inputs to the Application as submitted. The Consultation Report (Document 7.10), as prepared by Copper, catalogues the dialogue between the two parties leading up to the submission of the Application. Ramboll and Resound (on behalf of the Applicant) have undertaken liaison with SDDC representatives by telephone and also attended meetings with SSDC to discuss noise and vibration issues on 28th August 2017, 5th September 2018 and 19th December 2018.

14.2. This section covers Noise and Vibration issues. A separate SoCG has been prepared which addresses Air Quality issues. SSDC has confirmed that they do not feel the need to comment on lighting or land contamination issues as these matters are being considered by other consultees.

General Matters Agreed

14.3. The Applicant and SSDC agree on the following areas of interest to SSDC (specifically in relation to Noise and Vibration issues):

- The nature and extent of the development.
- The general mitigation methods to be applied during construction of the development.
- The Applicant and SSDC have worked positively to ensure the above level of agreement.

14.4. There are some areas where full agreement has not been reached. These are set out a the end of this Section.

Detailed Matters Agreed

14.5. Unless specifically stated elements of agreement relate to the latest assessment data available. For example, if data in the final Environmental Statement (ES) was superseded by the noise ES addendum chapter issued to SSDC on 24th October 2018, the agreement relates to the ES addendum chapter.

General

14.6. FAL and SSDC agree that the noise and vibration monitoring locations used in the final Environmental Statement (ES) and the ES addendum chapter are appropriate.

14.7. FAL and SSDC agree that the methodology of assessment and guidance outlined in the 'method of assessment' section of chapter 13 (Noise and Vibration) of the final ES are appropriate.

14.8. FAL and SSDC agree that the significance criteria outlined in the 'significance criteria' section of chapter 13 (Noise and Vibration) of the final ES (paragraphs 13.68 to 13.99) are appropriate.

14.9. FAL and SSDC agree that given limitations associated with earlier baseline noise surveys (due to the V-festival and on-going long-term roadworks in close proximity of the Site), the baseline monitoring data was appropriate for inclusion in the final ES, but that post-DCO submission additional baseline noise survey data was required to verify existing findings. This additional survey work was included in an ES addendum chapter and issued to SSDC.

14.10. FAL and SSDC agree that baseline vibration survey data included in the final ES comprises acceptable baseline vibration data.

14.11. FAL and SSDC agree that use of data from an existing comparable rail freight terminal that would be expected to produce the same noise sources, levels, duration, frequency etc would comprise appropriate data to undertake the operational noise assessment.

14.12. FAL and SSDC agree that in addition to the proposed embedded mitigation measures (i.e. noise bunds as included in the parameters plans) the use of a bespoke noise insulation scheme is an appropriate form of noise mitigation in principle.

14.13. FAL and SSDC agree that the approach adopted in the final ES to assess off-site traffic noise and vibration impacts and off-site railway noise and vibration impacts are appropriate.

14.14. FAL and SSDC agree that a thorough noise and vibration assessment has been undertaken and reported in the final ES and subsequent Addendum chapter.

14.15. FAL and SSDC agree that all relevant potential sources of environmental noise impacts have been identified and assessed.

14.16. FAL and SSDC agree that relevant British Standards and noise guidelines have been described and applied.

Survey Methodology

14.17. FAL and SSDC are in agreement regarding the following with respect to the surveys undertaken:

- the baseline noise survey was extensive and employed good practice.
- the representative background sound levels used are reasonable.
- the approach to obtaining 'real life' operational source data is good and robust.
- the updated baseline noise survey was reasonable and adequate.

Assessment Methodology

14.18. FAL and SSDC are in agreement regarding the following with respect to the assessment methodology undertaken:

- the number of locations assessed for the construction noise assessment was adequate.
- the use of a bespoke noise insulation scheme for construction noise (where applicable using the stated criteria) is a pragmatic approach described in Annex E.4 of British Standard 5228-1.
- the assessment of cumulative construction noise impact is adequate.
- the conclusion on construction vibration is reasonable.
- the conclusion that construction phase vibration works would result in a temporary moderate adverse impact is reasonable.
- the operational noise calculation assumptions are stated clearly and are reasonable.
- the acoustic character corrections for the operational noise assessment are reasonable.

14.19. FAL and SSDC agree that the assessment has been undertaken using reasonable worse case assumptions. These assumptions are appended to this SoCG (Appendix A).

Mitigation

14.20. FAL and SSDC are in agreement regarding the principle of a bespoke sound insulation scheme to control internal sound levels which is agreed to be appropriate for the proposed development.

14.21. FAL and SSDC agree that the eligibility of residential properties for sound insulation under the bespoke noise insulation scheme shall be:

- that the property legally exists or has been granted planning permission on the date of the DCO permission, without regard to proximity to the proposed development, **and**
- in terms of absolute external criteria (all three criteria are required to be met):
  - noise levels from the proposed development exceed façade noise levels of 66dB LAeq,16hrs during the daytime, or 62dB LAeq,8hrs during the night-time; and
  - noise levels increase by at least 1dB as a result of the proposed development; and
  - the contribution from the proposed development to the overall noise level is at least 1dB.

- **or**, in terms of relative criteria:
    - where the rating level at an eligible façade, including any appropriate character corrections, exceeds the background sound level in the absence of any sound from the proposed development, by 8dB or more, during either the daytime and/or the night-time, calculated in accordance with BS4142: 2014.
- **or**, in terms of internal criteria in habitable rooms:
    - where the internal rating level within a habitable room exceeds 40dB LAeq,16hrs during the daytime, or 35dB LAeq,8hrs during the night-time.

14.22. Four Ashes Ltd consider that the significance criteria presented in the ES remains valid and unchanged, even though the bespoke scheme has been adjusted as a result of the further discussions with SSDC. SSDC has no comment to make on this matter and considers the aims of the NPS to be met as stated in paragraph 14.24.

Enforcement

14.23. FAL and SSDC agree in principle that the DCO can remove the defence of statutory authority provided by section 158 of the Planning Act 2008. At the time of writing there was ongoing discussion between FAL and SSDC about how this should actually happen in practice. FAL and SSDC will continue to discuss this matter with the intention of agreeing wording to be incorporated into a future revision of the DCO.

Overall Summary

14.24. SSDC confirm that Four Ashes Ltd have done all that can be reasonably expected through design, embedded mitigation and the bespoke noise insulation scheme such that significant adverse impacts on health and quality of life from noise are avoided and adverse impacts are mitigated and minimised and therefore, taking into account the broader strategic principles of the NPS and the NPPF and the existing noise climate there is no reasonable or sustainable objection to the proposed development on noise and vibration grounds and that SSDC consider the scheme meets the aims of the NPS in relation to noise and vibration.

14.25. There are no matters not agreed.

Conclusion

14.26. This statement sets out a record of the Noise and Vibration issues of interest to South Staffordshire District Council and the extent to which these are agreed with Four Ashes Limited.

14.27. It sets out the general circumstances surrounding each issue and the position reached at the time of writing.

15. Air Quality

Introduction

15.1. The Applicant and SSDC have corresponded though the consultation period of the Application. This has shaped the technical inputs to the Application as submitted. The Consultation Report (Document 7.10), as prepared by Copper, catalogues the dialogue between the two parties leading up to the submission of the Application. Ramboll has undertaken liaison with SDDC representatives by telephone and also attended a meeting with SSDC on 28 August 2017 to discuss air quality issues.

General Matters Agreed

15.2. FAL and SSDC agree on the following areas of interest to SSDC (specifically in relation to Air Quality issues):

- The nature and extent of the development.
- The general mitigation methods to be applied during construction of the development.

15.3. FAL and SSDC have worked positively to ensure the above level of agreement.

15.4. FAL and SSDC agree that the air quality review and assessment process conducted between SSDC and FAL which has resulted in revised predicted air pollution levels applies to the SSDC District only and not to any other local authority area.

Detailed Matters Agreed

15.5. FAL and SSDC agree that the scope of the air quality assessment (as submitted to SSDC by email on 29th August 2017) comprises an appropriate methodology for the assessment.

15.6. FAL and SDDC agree that it is appropriate to assess impacts from rail freight movements following the scoping criteria set out in LAQM.TG(16).

15.7. FAL and SSDC agree that it is appropriate to assess impacts of traffic emissions using the ADMS Roads dispersion model (with the parameters outlined in the email issued to SSDC dated 29th August 2017).

15.8. FAL and SSDC agree that the approach used to obtain traffic data for the study area (as outlined in the email dated 29th August 2017) is appropriate.

15.9. FAL and SSDC agree that the latest version of the Defra toolkit has been used.

15.10. FAL and SDDC agree that the findings of the compliance risk assessment (paragraphs of 7.198 – 7.203 of the Environmental Statement (ES)) are appropriate with respect to compliance with the relevant zone / agglomeration. It would not affect the ability of a non-compliant area to achieve compliance within the shortest period. The proposed development would not therefore change the compliance status of the West Midlands non-agglomerated Zone.

15.11. FAL and SDDC agree that the proposed development would not result in the need to designate a new air quality management area (AQMA) or require a change in the size of an existing AQMA.

15.12. FAL and SSDC agree that potential air quality effects on ecological receptors are assessed in chapter 10 of the ES.

15.13. FAL and SSDC agree with the findings of the construction phase dust assessment undertaken and that High Risk mitigation measures (as defined in the IAQM guidance) are required to be employed, which is the highest category available. With this mitigation in place, the effects of construction dust are not significant.

15.14. FAL and SSDC agree that railway emissions from moving locomotives have been considered in accordance with Defra LAQM.TG(16) criteria. The proposed development does not meet the Defra criteria for the assessment of rail emissions from moving locomotives to be necessary.

15.15. FAL and SSDC agree that Defra LAQM.TG(16) guidance requires an assessment to be made only where there is exposure within 15m of stationary locomotives. The only location where there would be large numbers of stationary locomotives would be within the freight terminal itself. As there is no public access to the freight terminal, this criterion is not met and therefore no assessment of the impact of idling locomotives is required.

15.16. FAL and SSDC agree that in South Staffordshire District the air quality objectives are unlikely to be exceeded in the opening year or beyond as a result of the proposed development. Furthermore, the proposed development will not bring about the need for a new AQMA or change the size of an existing AQMA within South Staffordshire District.

15.17. The predicted changes in air quality, in combination with concentrations below the air quality objectives, indicate that the overall effects of the proposed development will be 'not significant'

15.18. SSDC and FAL have worked positively to agree issues around the verification of the air quality modelling. This review process highlighted a number of issues in the air quality assessment. Following a meeting on 21st February 2019 between SSDC and Ramboll (acting on behalf of FAL) where the air modelling was discussed, Ramboll took on board comments raised and undertook a thorough re-appraisal of the modelling, in particular to consider potential anomalies and also consider where an overly conservative bias was potentially being applied. FAL and SSDC agree these issues have now been addressed by Four Ashes Ltd. It remains the concern of SSDC that the verification factors used at motorway locations are subject to different interpretations as the guidance is not prescriptive and that over predictions may still be occurring (whereas Ramboll consider the verification factors do accord with guidance and this may be leading to over predictions but this is a conservative approach). However, SSDC note that changing the

verification factor for motorway locations will not alter the overall conclusions set out in paragraphs 15.10, 15.16 and 15.17 above.

Overall Summary

15.19. There are no matters not agreed.

Signed on behalf of South Staffordshire District Council

Name [redacted]

Signature

Position

Date

Signed on behalf of the Applicant (Four Ashes Limited)

Name [redacted]

Signature

Position

Date

Appendix A – Summary of worse case assumptions used in the noise assessment

Appendix A

The worst-case assumptions that were included in the noise assessment calculations were as follows:

- the assessment method itself is a worst-case approach as the following should all be included:
    - all loading/unloading activities;
    - all process noise (i.e. activities typically within buildings);
    - vehicle movements in service yards and car parks;
    - vehicle movements on site roads;
    - the previous version of the standard only required fixed plant to be assessed, yet the assessment outcomes remain as they were, i.e. same outcomes despite needing to include more sources;
- the use of background sound level data that, although not equal to the lowest values, is nonetheless biased towards the lowest measured values;
- operational assumptions for the site that include shunters for the large units and for the terminal to unit movements, forklifts operating outside buildings for all buildings, level access doors being open, internal sound levels that is a robust figure for B8 type uses;
- traffic movements based on the flows that give the highest noise levels for each of the daytime and night-time periods;
- loading/unloading activities that are linked to these flows that give the highest noise levels;
- noise levels for individual road-going vehicles that are set at the highest representative value that they can be, so that all vehicles on the site roads and in yards are effectively at their noisiest;
- buildings oriented in a way that generates the highest off-site sound levels;
- loading/unloading activities at the rail terminal assumed to occur throughout the assessment periods;
- self-screening as a result of vehicles in yards has been ignored;
- for the rail terminal either trains moving in/out of the sidings, or idling trains during loading/unloading operations were included, with the higher values used; and
- the calculation method used (ISO9613) assumes downwind propagation for all receptors, i.e. a wind direction that assist sound propagation from every source to every receptor simultaneously.