



SECTION 60 OF THE PLANNING ACT 2008

LOCAL IMPACT REPORT [LIR] PREPARED BY SOUTH STAFFORDSHIRE DISTRICT COUNCIL [SSDC]

PINs Reference: TR 050005

IP Ref: 20015762

Applicant: Four Ashes Ltd [FAL]

Location: Land at Four Ashes, Gailey, South Staffordshire

Proposal: Construction of a Strategic Rail Freight Interchange [SRFI]

5 April 2019



Contents

1. Introduction
2. Planning Policies
3. Proposed Development
4. Site Characteristics
5. Socio-economic characteristics
6. Negative Impacts of WMI
7. Positive impacts of WMI
8. Neutral Impacts of WMI
9. Conclusions

Appendices

1. Bericote Four Ashes: Growth Deal Area Profile November 2015

1.0 INTRODUCTION

1.1 Local Impact Report

- 1.1.1 South Staffordshire District Council (SSDC) is one of 8 district councils that form part of the County of Staffordshire. SSDC has a common boundary with 3 of the 4 Black Country Authorities (City of Wolverhampton, Walsall and Dudley MBCs), the Unitary Authorities of Shropshire and Telford & Wrekin, the Worcestershire districts of Wyre Forest DC and Bromsgrove and the 2 Staffordshire districts of Stafford Borough and Cannock Chase DC.
- 1.1.2 The Council submitted a Relevant Representation [RR] and has also followed this up by submitting a Written Representation [WR]. As an interested party (and one of the host authorities together with Staffordshire County Council), SSDC has been invited by the Examining Authority (EA) to submit a Local Impact Report (LIR) giving details of the likely impact of the proposed development on the authority's area.
- 1.1.3 This document constitutes SSDC's LIR in relation to the application by Four Ashes Ltd (FAL) for a Development Consent Order (DCO) for the Strategic Rail Freight Interchange (SRFI) which FAL is calling West Midlands Interchange (WMI)
- 1.1.4 This LIR considers:
- Planning policies
 - Application Proposals
 - Site Characteristics
 - Socio-economic characteristics of the District's population and workforce
 - Negative Impacts of WMI
 - Positive Impacts of WMI
 - Neutral impacts of WMI
 - Conclusions
- 1.1.5 The LIR comments on the principal issues relevant to SSDC as identified in the EA's Rule 6 letter issued on 23 January 2019. SSDC aims to assist the EA by identifying local issues which are of particular concern to the District of South Staffordshire.
- 1.1.6 The Council's LIR follows the Relevant Representation made under s.56 of the Act (dated 29 October 2018) which set out the Council's position with regards to the WMI DCO application.
- 1.1.7 Staffordshire County Council (SCC) has prepared its own LIR to identify local issues that are more appropriately addressed at a wider spatial scale by the 'upper tier' authority (County of Staffordshire). There has been close working between SCC and SSDC in the preparation of the 2 LIRs (which should be read together) as creating a comprehensive picture of the local impact of the DCO proposal.

1.2 Purpose

1.2.1 A Local Impact Report (LIR) is defined in s60 of the Planning Act as:

'A report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'

1.2.2 The Planning Inspectorate's (PINs) Advice Note One on LIRs (April 2012) notes that content of an LIR is a matter for the local authority concerned as long as it falls within this statutory definition, and provides advice on scope and content. This LIR takes account of the Advice Note.

1.2.3 The Council has agreed a Statement of Common Ground (SoCG) with the applicant. Furthermore (and without prejudice to the outcome of the DCO application) SSDC is also discussing an emerging Section 106 Agreement with the applicant and again will seek to finalise within the timetable.

2.0 PLANNING POLICIES

2.1 Development Plan for South Staffordshire

2.1.1 The Council's Core Strategy (CS) was adopted in December 2012 post introduction of the National Planning Policy Framework (The Framework) in March 2012. Since then, Government has published a revised Framework [24 July 2018].

2.1.2 The Council's Site Allocations Document [SAD] was adopted in September 2018. The adopted CS and SAD (together) comprise the Local Plan for South Staffordshire. There are no site allocations for new rail freight interchange sites in the adopted SAD.

2.1.3 Staffordshire County Council is the local planning authority for Minerals and Waste Disposal matters. Adopted plans and relevant policies in these topic areas will be considered in the County LIR.

2.1.4 South Staffordshire occupies a unique position on the edge of the West Midlands conurbation. There are around 30,000 jobs provided in South Staffordshire but many of our residents commute out of the District and into the conurbation and surrounding areas. A significant proportion of new jobs in South Staffordshire are in the knowledge driven sector of the economy and tourism. Local residents rely heavily on nearby towns and cities such as Stafford, Cannock, Walsall, Wolverhampton, Cannock and Stourbridge for their higher order services, such as hospitals, leisure services, higher education facilities as well as employment opportunities.

2.1.5 South Staffordshire has an important role to play in achieving economic growth within the West Midlands. The thrust of the strategy for employment and economic development in South Staffordshire is to focus on the four freestanding strategic employment sites (i54, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes) [CS

Paragraph 9.4]. The origins of 2 of these strategic employment sites (i54 & Hilton Cross) rests in the former Regional Planning Guidance (RPG) of the late 1990s. The aim of providing these sites was principally to support the economic regeneration needs of the Black Country Sub-Region.

Relevant Core Strategy (CS) Policies

- 2.1.6 The Spatial Strategy for the District is set out in Strategic Objectives 1 and 2, which seek to protect the Green Belt and aim to retain and re-inforce the current pattern of development, together with Core Policy 1, which identifies how development will be focused in the most sustainable locations through the settlement hierarchy and confirms that the Green Belt will be protected from inappropriate development.
- 2.1.7 Policy GB1 sets out the circumstances where development acceptable within the terms of national planning policy set out in the NPPF will be allowed in the Green Belt.
- 2.1.8 Core Policy 2 confirms that the Council will support development which protects, conserves and enhances the District's natural assets and this is expanded in Policy EQ1.
- 2.1.9 Policy EQ4 is clear that the intrinsic rural character and local distinctiveness of the District should be maintained and/or enhanced.
- 2.1.10 Core Policy 3 requires development to cater for the effects of climate change and minimise environmental impacts.
- 2.1.11 Policy EQ5 and EQ7 seek to ensure that impact on the environment is minimised and that proposals do not have a negative impact on water quality.
- 2.1.12 Core Policy 4 and Policies EQ11 and EQ12 expect development proposals to achieve a high quality of both the design of buildings and their landscape setting and set out the criteria that will be applied when assessing the design and landscaping of a proposal.
- 2.1.13 Core Policy 7 supports measures to sustain and develop the local economy of South Staffordshire, whilst Core Policy 9 supports the social and economic needs of rural communities within the District. Policy EV5 sets out the criteria where proposals for employment development outside development boundaries will be supported.
- 2.1.14 The explanatory text that underpins Core Policy 7 [Paragraphs 9.3-9.13] refers to the issue of Regional Logistics Sites (RLS). At Paragraph 9.11 it is stated *'The Council accepts that the RLS issue remains outstanding and that a comprehensive study should now be set in train'*. The background to RLS is set out in the Statement of Common Ground (SoCG) between SSDC and Four Ashes Ltd (FAL).

- 2.1.15 Policy EQ9 considers the amenity of residents near to proposed development, particularly with regard to privacy, security, noise and disturbance, pollution, odours and daylight.
- 2.1.16 Policy EQ10 seeks to protect the public, land uses and the natural environment from proposals which would be detrimental to public health or amenity.
- 2.1.17 Core Policy 11 seeks to ensure that accessibility will be improved and transport choice widened by ensuring that new development is well served by a choice of transport modes, including public transport. Policy EV11 elaborates on the measures required to provide for sustainable forms of transport to access the site and Policy EV12 identifies the criteria for assessing appropriate provision for off street parking.
- 2.1.18 Core Policy 13 supports initiatives that promote the safety of people, both in their own homes and in the community. In particular, the design of all developments must take account of the need to reduce the opportunities for crime and fear of crime. Policy CS1 advises on ways this may be achieved.
- 2.1.19 The Site Allocations Document (SAD) was adopted in September 2018. At Paragraphs 9.32-9.33 reference is made to search areas for Regional Logistics Sites (RLS) that were highlighted in the (now revoked) West Midlands Regional Spatial Strategy (WMRSS) in southern Staffordshire to serve the Black Country. At Paragraph 9.33 it is stated *'The Core Strategy recognises employment cross-boundary issues and the requirement to consider if a Regional Logistics Site is needed in light of the WMRSS evidence base.'* Paragraph 9.33 concludes *'...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.'*
- 2.1.20 On 08 October 2018 the Council launched a Local Plan Issues & Options Consultation Document. The topic of Strategic Rail Freight Interchanges (SRFI) is considered at Paragraphs 4.26-4.27 of this document. It is stated at Paragraph 4.26 *'Historically South Staffordshire has come under pressure to consider whether or not a single large scale logistics site could be accommodated in the district to serve the rail freight distribution needs of the wider region.'*

2.2 National Policy

- 2.2.1 The Council notes that the relevant national policy document that the Scheme must meet in terms of policy compliance is the National Networks National Policy Statement (NPS) - which the Secretary of State must have regard to in evaluating the merits of the Scheme.
- 2.2.2 The purpose and scope of the National Networks NPS makes it clear that the overall strategic aims of the National Planning Policy Framework (NPPF) and the National Networks NPS are consistent, however, the two have differing roles to play. The NPPF is also likely to be an important and relevant consideration in decisions on

nationally significant infrastructure projects, but only to the extent relevant to that project [National Networks NPS Paragraphs 1.17 – 1.18].

- 2.2.3 The National Networks NPS was designated as a National Policy Statement (under provisions of Section 5 [4] of the Planning Act 2008) on 14 January 2015.

It is stated at Paragraph 1.2 of the National Networks NPS that:

‘The Secretary of State will use this NPS as the primary basis for making decisions on development consent applications for national networks nationally significant infrastructure projects in England. Other NPSs may also be relevant to decisions on national networks nationally significant infrastructure projects. Under section 104 of the Planning Act the Secretary of State must decide an application for a national networks nationally significant infrastructure project in accordance with this NPS unless he/she is satisfied that to do so would:

- *lead to the UK being in breach of its international obligations;*
- *Be unlawful;*
- *Lead to the Secretary of State being in breach of any duty imposed by or under any legislation;*
- *Result in adverse impacts of the development outweighing its benefits;*
- *Be contrary to legislation about how the decisions are to be taken*

Within the National Networks NPS [Chapter 2] the Government has set out its vision and strategic objectives for the national networks:

‘The Government will deliver national networks that meet the country’s long term needs; supporting a prosperous and competitive economy and improving overall quality of life, as part of a wider transport system. This means:

- *Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs;*
- *Networks which support and improve journey quality, reliability and safety;*
- *Networks which support the delivery of environmental goals and the move to a low carbon economy;*
- *Networks which join up our communities and link effectively to each other.’*

Strategic Rail Freight Interchanges (SRFIs)

- 2.2.4 The National Networks NPS defines a Strategic Rail freight interchange (SRFI) as 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.’ (NPS Paragraphs 2.42 – 2.45).

The Planning Act 2008 (Part 3) sets out a schedule of Nationally Significant Infrastructure Projects (NSIPs). Rail Freight Interchanges are included at Section 26 and include the following qualifying criteria: -

‘...

- (3) *the land on which the rail freight interchange is situated must a) be in England and b) be at least 60 hectares in area*
- (4) *the rail freight interchange must be capable of handling a) goods from more than one consignor and to more than one consignee and at least 4 goods trains/day*
- (5) *the rail freight interchange must be part of the railway network in England*
- (6) *the rail freight interchange must include warehouses to which goods can be delivered from the railway network in England either directly or by means of another form of transport’*

...’

2.2.5 At Paragraph 2.42 the NPS states: -

‘The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road, through co-location of other distribution and freight activities. SRFIs are a key element in reducing the cost to users of moving freight by rail and are important in facilitating the transfer of freight from road to rail, thereby reducing trip mileage of freight movements on both the national and local road networks.’

2.2.6 At Paragraph 2.47 the NPS refers to the changing needs of the logistics sector: -

‘A network of SRFIs is a key element in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry, especially the ports and retail sector. SRFIs also play an important role in reducing trip mileage of freight movements on the national and local road networks.

The siting of many existing rail freight interchanges in traditional urban locations means that there is no opportunity to expand, that they lack warehousing and they are not conveniently located for the modern logistics and supply chain industry.’

2.2.7 At Paragraphs 2.53 – 2.58 the Government sets out its policy for addressing need for SRFIs. At 2.56 it is stated that: -

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

Paragraph 5.159 of the National Networks NPS states:

“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.”

Protecting Green Belt Land

- 2.3.8. The importance of Green Belt policy is highlighted in the National Networks NPS at Paragraph 5.178.

‘5.178 When located in the Green Belt national networks infrastructure projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The Secretary of State will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt, when considering any application for such development.’

2.3 NPPF Policies Relevant to the WMI scheme

- 2.3.1 Revised NPPF 2018 was published by Government on 24 July 2018.

At Paragraphs 5 & 6 it is stated that:

‘5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.

6. Other statements of government policy may be material when preparing plans, such as Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.’

NPPF 2018 Section 6 – Building a strong, competitive economy

- 2.3.2 Suitably accessible locations for storage and distribution uses is highlighted in Section 6 of NPPF 2018

'82. Planning policies and decisions should recognize and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operators at a variety of scales and in suitably accessible locations.'

NPPF 2018 Section 8 – Supporting Sustainable Transport

- 2.3.3 Reducing congestion and carbon emissions is encouraged in NPPF 2018

'103 The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximize suitable transport solutions will vary between urban and rural areas, and this should be taken into account in in plan-making and decision-making.'

- 2.3.4 The importance of addressing the issue of overnight lorry parking facilities is highlighted in NPPF 2018

'107. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded centres should make provision for sufficient lorry parking to cater for their anticipated use.'

NPPF 2018 Section 14 – Meeting the challenge of climate change, flooding and coastal change

- 2.3.5 The planning system should support the transition to a low carbon future in a changing climate:

'148. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.'

NPPF 2018 Section 15 – Conserving and enhancing the natural environment

2.3.6 Minimising impacts and achieving net gains for biodiversity is encouraged in Paragraph 170 of NPPF 2018:

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

.....

d) minimizing impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

.....'

The loss or deterioration of irreplaceable habitats [such as ancient woodland and ancient or veteran trees] can be acceptable in the case of National Infrastructure Projects where the public benefit outweighs the loss or deterioration of habitats is set out at Paragraph 175 c) and footnote 58 of NPPF 2018.

NPPF Section 4 – Decision-making

2.3.7 There are restrictions regarding what matters can be covered by Section 106 Agreements/Planning Obligations as set out in NPPF 2018 Paragraph 56

'56. Planning obligations must only be sought where they meet all of the following tests: -

- Necessary to make the development acceptable in planning terms;*
- Directly related to the development; and*
- Fairly and reasonably related in scale and kind to the development'*

3.0 PROPOSED DEVELOPMENT

3.1 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

4.0 SITE CHARACTERISTICS

- 4.1 The site is approximately 300 hectares in size and is situated in close proximity to M6 Junction 12. In addition to the M6 the Site is also bounded by the principal strategic roads of the A5 [running from Junction 12 M6 in a westerly direction to Gailey Island and then beyond to Shropshire & Telford] and the A449 [running southwards from Gailey Island southwards towards Junction 2 M54 and Wolverhampton]. Other roads that bound the site comprise Stable Lane and Woodlands Lane to the east, ; Station Drive, Straight Mile and Woodlands Lane to the South. The south-eastern area of the Site is bisected by Vicarage Road. Calf Heath reservoir abuts the site to the north, adjacent to the A5.
- 4.2 The site is generally flat and predominantly arable farmland, with hedgerows/trees and includes a large sand and gravel quarry in the east/north-east of the Site. The mixed plantation woodland (known as Calf Heath Wood) is located in the centre of the Site. The Staffordshire & Worcestershire Canal runs roughly north to south through the western part of the site. The West Coast Mainline (WCML) [Birmingham/Wolverhampton Branch] runs north to south through the Site.
- 4.3 Public Access to the Site is limited. A single Public Right of Way exists in the north-west and provides a link between Croft Land and the A449 via an overbridge to the railway. A towpath also extends along the western side of the Canal along its length through the site.
- 4.4 The Site is generally bound to the north by the A5 [Watling Street]; to the east by Calf Heath Reservoir and some pastoral farmland; to the south by a chemical works and Four Ashes Industrial Estate; the Staffordshire & Worcestershire Canal, Straight Mile road and farmland and to the west by the A449 Stafford Road. Two existing industrial uses border the central enclave of the Site boundary.

5.0 SOCIO-ECONOMIC CHARACTERISTICS

5.1 Socio Economic Profile

- 5.1.1 The WMI site is located immediately adjacent to the Bericote site at Four Ashes. Bericote Four Ashes is a 21.45 hectare site with planning permission for B2 (manufacturing) and B8 (distribution and warehousing) development. A successful Local Growth bid was secured through the Stoke and Staffordshie LEP to secure an improved access from the A449 (widen and achieve priority control for an existing bridge over the Stafford and Worcestershire canal).

- 5.1.2 A socio-economic profile was developed to better understand the skills and employment issues for the Bericote Four Ashes development. The profile is attached at Appendix 1 and was prepared using information provided by a number of Staffordshire County Council Teams (including Insight, Regeneration, Travel Planning, Economic Development & Skills and Further Learning). Where possible this local information was supplemented with national data to strengthen understanding of the potential skills and employment issues for the Bericote Four Ashes development. Given the close proximity of Bericote Four Ashes to the DCO application site, it is considered that the profile at appendix 1 is equally relevant for the SRFI proposal.
- 5.1.3 The DCO application site has excellent access to all major Research & Development and distribution locations throughout Britain, being located close to major road and rail networks, cities and airports.
- 5.1.4 The economic activity of residents in South Staffordshire is similar to the regional and national averages (see Appendix 1).
- 5.1.5 It is reasonable to conclude that (like Bericote Four Ashes) there are 628,000 employees in the DCO SRFI Four Ashes catchment area and that there is a higher % of full time (68.7%) than part time (31.3%) employees which is similar to the national average.
- 5.1.6 The proportion of South Staffordshire residents claiming out of work benefits (9.1%) is lower than the regional (10.7%) and national (9.4%) averages. The socio-economic profile (attached at Appendix 1) comprises a breakdown of out of work benefits and shows a decrease within the anticipated DCO SRFI catchment area (however Employment Support allowance and Incapacity Benefits are increasing). The anticipated DCO SRFI catchment area has a similar Job Seekers Allowance (JSA) claimant rate as the West Midlands for working age population, but is above the Staffordshire and national averages.
- 5.1.7 The anticipated DCO SRFI catchment area has the highest rate of youth unemployment when compared to the County of Staffordshire, regional and national averages.
- 5.1.8 At ward level, Bilbrook and Wombourne South West have the highest overall JSA rates, whereas Himely, Swindon and Bilbrook have the highest proportion of youth unemployment.
- 5.1.9 The proportion of 16-18 year olds classified as Not Being in Education, Employment or Training (NEETs), in South Staffordshire, is lower than the County, regional and national averages.
- 5.1.10 The top 5 industry sectors for full-time employees in the anticipated DCO SRFI catchment are: -
1. Manufacturing (18%)

2. Health (12%)
3. Business administration support services (8%)
4. Wholesale (7%)
5. Transport and storage (including postal) [6%]

5.1.11 The anticipated DCO SRFI catchment area has a higher % of full-time employees working in these 5 industry sectors when compared to the County, regional and national averages (with the exception of health).

5.1.12 The most prominent industry sectors for part-time employees are Retail, Health & Education (with part-time employees making up around 31% of total employees).

5.1.13 Business administration and law (31%) is the highest apprentice sector subject area in South Staffordshire, this is also the highest apprenticeship subject area for the County, West Midlands and England.

5.2 Income Levels

5.2.1 The gross average annual salary of full-time workers in South Staffordshire (£26,630) is similar to the County (£26,240), West Midlands Region (£25,018) and England (£27,500) averages.

5.2.2 Logistics is the industrial sector most likely to be present on the DCO SRFI site. In the logistics sector the salary for a 'logistics manager' can range from £25,002 to £45,609. A 'warehouse worker' can earn between £13,345 and £19,040/annum.

5.3 Travel to Work

5.3.1 25,540 (47.6%) of working age residents living in South Staffordshire work within Staffordshire. 19,160 (35.7%) work within South Staffordshire District itself, and this is the lowest proportion of all districts within Staffordshire.

5.3.2 The remaining 28,134 (52.4%) of working age residents commute to areas outside of Staffordshire. The most popular work destination being Wolverhampton (10,381 [19.3%]) followed by Walsall (3,876 [7.2%]), Dudley (3,736 [7%]), Birmingham (2,545 [4.7%]), Sandwell (1,894 [3.5%]) and Telford & Wrekin (1,446 [2.7%]).

5.3.3 The main method of travel to work is by car (80%).

6.0 NEGATIVE IMPACTS OF WMI

6.1 Scale of WMI scheme

6.1.1 The scale of the WMI scheme gives rise to harmful local impacts which are significant. The bigger the development proposed then the consequential impacts are proportionately greater. The site area is 300 hectares (albeit 100 hectares of which is green infrastructure). A total of 7.4 million sq ft of built development is proposed. The consequential impacts include loss of Green Belt, visual impact,

increased traffic generation (particularly increased HGV movements), air quality, noise & vibration, landscape impacts, impact on historic assets, impact on ecology/biodiversity, loss of residential amenity, light pollution and potentially increased housing requirements for South Staffordshire. In essence the negative impacts are predominantly local.

6.2 Loss of Green Belt openness

6.2.1 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence [NPPF 2018 Paragraph 133].

6.2.2 There will be significant loss of openness if the WMI scheme is consented by the Secretary of State. Potentially (when completed) there could be as much as 7.4 million square feet of warehouse buildings that would stretch across 300 hectares of land that is currently open and (in essence) free of built development.

6.3 Encroachment into countryside

6.2.1 It is important to consider which of the 5 Green Belt purposes (set out in NPPF Chapter 13 Paragraph 134) are engaged by the WMI scheme.

6.3.2 The WMI site (comprising 300 hectares) is not located on the edge of the built up area of the West Midlands conurbation. It is located approximately 6 miles north of Wolverhampton, about 3 miles west of the shire town of Cannock and about one mile south of the village of Penkridge. The application site is located adjacent to a long established industrial site known as Four Ashes (which is not located within the Green Belt). Four Ashes is one of 4 free-standing strategic employment sites identified within the adopted Core Strategy (See EV policies in the Core Strategy). In this location the WMI scheme would not give rise to unrestricted urban sprawl.

6.3.3 The application site is contained within boundaries that are largely framed by strategic roads that comprise the M6 Motorway (to the east), the A5 (to the north) and the A449 (to the west). The site is adjacent to the Four Ashes industrial estate as described above. The West Midlands conurbation is located approximately 6 miles to the south and Cannock is located about 3 miles to the east. The village of Penkridge is located about 1 mile to the north of the site. Given this geography, the proposal would not give rise to a merging of towns.

6.3.4 There can be no doubt that the proposal would create a significant encroachment into the countryside and therefore this Green Belt purpose is (without doubt) fully engaged in the consideration of the WMI scheme.

6.3.5 There are no historic towns within the local environs of the WMI site and therefore this Green Belt purpose is clearly not engaged.

6.3.6 The National Networks National Policy Statement (NNNPS) makes it clear that the particular locational criteria that define Strategic Rail Freight Interchanges (SRFIs)

mean that it is extremely unlikely (almost impossible) to find a suitable site for an SRFI within large built up areas. For this reason it would be difficult to assert that the location of the WMI site would deny an opportunity to recycle derelict and urban land within the conurbation (or indeed land within neighbouring towns/villages). For this reason the proposal would not harm urban regeneration and therefore this Green Belt purpose is not engaged.

- 6.3.7 In conclusion there is one purpose of Green Belt that is fully engaged by the WMI scheme and this is the safeguarding of the countryside from encroachment.

6.4 Inappropriate Development

6.4.1 An SRFI (as proposed in this DCO application) does not fall within any of the categories of development considered to be appropriate development as set out in Policy GB1 of the adopted Core Strategy. The same conclusion is drawn from reference to the NPPF 2018 (from which Policy GB1 is derived). The proposed development therefore constitutes inappropriate development within the Green Belt. Inappropriate development is (by definition) harmful to the Green Belt and should not be approved except in very special circumstances [NPPF 2018 Paragraph 143].

6.4.2 When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 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 [NPPF 2018 Paragraph 144 and National Networks NPS Paragraph 5.178].

6.5 Harm to Green Belt

6.5.1 In conclusion, harm to Green Belt interests arises from inappropriateness, loss of openness, and harm to individual Green Belt purposes. The specific purpose that suffers harm in the case of the proposed Strategic Rail Freight Interchange (SRFI) is that of safeguarding the countryside from encroachment. This is in addition to inappropriateness and loss of openness. Each of these components of Green Belt harm – inappropriateness, loss of openness and encroachment, attract substantial weight in the ‘planning balance’ of this planning decision.

6.6 Environmental Impacts

6.6.1 On 08 October 2018 the Council launched a Local Plan Issues & Options Consultation Document. The Council has given consideration to the likely impact of the WMI scheme (if consented). It considers that the environmental impact will be negative and states in Paragraphs 3.8 and 3.21 of the Consultation document:

‘3.8Threats – West Midlands Interchange (WMI) strategic rail freight interchange poses a threat to the district if permitted – in terms of the environmental

impact and potential for increased pressure on infrastructure and for additional housing.'

'3.21 Understanding the outcome of the West Midlands Interchange (WMI) proposal if permitted - This includes potential impacts on the local environment, as well as impact on infrastructure and housing requirements. If permitted the scheme would increase the number of people coming into the district for work and therefore using the infrastructure network; or coming into the district to live, therefore increasing the pressure for additional housing.'

- 6.6.2 There is low unemployment in the District of South Staffordshire and in the County of Staffordshire overall. In addition the types of jobs that South Staffordshire residents access are not low skilled jobs within storage and distribution sheds. The estimated number of jobs created by the WNI scheme is 8,550. The negative consequence of this situation will be increased propensity of workers to travel from longer distances. Travel by private cars [without substantial levels of car sharing or coaches/buses provided from key locations] will result in significant increased volume of private motor cars on the highway networks in the environs of the WMI site. The likely consequence is increased congestion and the likelihood that the behaviours of private car drivers to seek alternative 'rat-runs' through the rural roads that surround the environs of the WMI DCO site. This will have a negative impact on the amenities of local residents through traffic noise and increased carbon emissions with a consequential impact on air quality.
- 6.6.3 The WMI scheme would introduce a significant number of additional Heavy Goods Vehicles (HGVs) into the local area. The local area currently experiences problems associated with HGV drivers spending time in the local area (either because they arrive early for collections/deliveries or their driving hours are limited). This gives rise to random parking on local roads and in lay-bys. We see this impact on local amenities becoming far worse as a consequence of the proposed development [unless suitable provision for HGV parking, including longer stays for sleep over/longer breaks, is included within the WMI site].
- 6.6.4 The anticipated timeframe for the completion of this development is 15 years. Therefore the WMI scheme has the potential to have a significant impact on the local community whilst it is being constructed as well as when it is in operation. Phasing of the development must be considered carefully in order to minimize the impact on local residents.
- 6.6.5 The Council recognises that public access to the WMI site is limited. However there is public access along one bank [the towpath] of the Staffordshire & Worcestershire canal (which passes through the site). There is also a public footpath passing through the site - in the north-west and provides a link between Croft Land and the A449 via an overbridge to the railway. There will be visual harm caused through the perceived loss of openness arising from the introduction of a significant scale of new built development onto a site that is currently predominantly open, green and free from built development. This harmful visual impact will be seen from public

viewpoints that will include roads/footways, the canal, one public footpath and bridges.

6.7 Noise and Vibration

- 6.7.1 Operational noise from the proposed development is likely to result in significant adverse impacts at the worst affected locations. These locations will benefit from a bespoke noise insulation scheme. This will reduce the impact from significant adverse to adverse.
- 6.7.2 Daytime external noise levels will increase but will meet the upper 55dB threshold set out in BS8233:2014 and the WHO Guidelines at all of the residential locations assessed as a result of noise from the proposed development.
- 6.7.3 Adverse impacts will remain at the canal moorings. However, the impacts on the moorings will be temporary impacts for users given the restrictions on mooring durations.
- 6.7.4 The canal towpath, as part of the Staffordshire and Worcestershire Canal Conservation area is likely to experience a significant adverse impact. This is not a residential location and its impact on users is transient.
- 6.7.5 SSDC and Four Ashes Ltd have agreed a Statement of Common Ground and agree that the development meets the requirements of the NPS.

6.8 Air Quality Impacts

- 6.8.1 The development is a new development and will introduce new sources of air pollution into the area. The development does not have any benefit to existing sources of air pollution.
- 6.8.2 Independent expert advice on air quality modelling and air quality impacts has been obtained. This confirms that the impact of the development in the SSDC area will not be significant. SSDC is unable to comment on whether this applies beyond its boundary.
- 6.8.3 SSDC and Four Ashes Ltd have agreed a Statement of Common/Uncommon Ground and agree that the development meets the requirements of the NPS for the SSDC District. SSDC cannot comment if this is the case for other local authority areas.

6.9 Negative Lighting Impacts

- 6.9.1 The development is a new development and will introduce new sources of light pollution into the area. The development does not have any benefit to existing sources of light pollution.
- 6.9.2 At the time of completing this Local Impact Report SSDC has not completed its assessment of the impact of the development in relation to light pollution and

cannot categorically state, as it can with air pollution and noise and vibration that it has no objection in principle on light pollution grounds and therefore SSDC may have further representations to make on any negative lighting impacts. However, SSDC recognises that the lighting installations are phase specific and the specific lighting installations will need to be agreed with SSDC at each phase which will afford the opportunity to ensure that light pollution is adequately controlled.

- 6.9.3 It is therefore unlikely that there will be an objection in principle on light pollution grounds and there will be no matters that cannot be agreed between SSDC and Four Ashes Ltd. Furthermore in agreement with Four Ashes Ltd the defence of statutory authority in relation to Part III of the Environmental Protection Act 1990 (Statutory Nuisance provisions) has been dis-applied to the development and therefore there are no restrictions on SSDC taking action for light nuisance under the statutory nuisance provisions of the Environmental Protection Act 1990 should the need arise.

7.0 POSITIVE IMPACTS OF WMI

7.1 Economic Impact

- 7.1.1 WMI would deliver economic benefits at local, regional and national levels.
- 7.1.2 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.
- 7.1.3 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.
- 7.1.4 There is a large pool of potential labour supply available at appropriate skill and occupation levels, which reinforced by an effective Employment Training and Skills Plans, should support the scale of growth at WMI, including residents who are currently unemployed and those who are economically inactive but want a job
- 7.1.5 There is a significant concentration of population living within the Black Country and its local environs. The proposed WMI scheme will enable the metropolitan area to service the people who live there with the goods (that are essential to their quality of life) in an efficient and effective manner that is economic and environmentally beneficial through the reduction in congestion on the Strategic Road Network (SRN) and helping to reduce greenhouse gases and the consequential impacts of climate change.
- 7.1.6 A significant amount of business rates would be payable to the District and County Councils every year [that could be spent on sustaining local services]. Annual non-domestic rates payable are anticipated to be circa £16.2m.

Potential Positive Noise and Vibration Impacts

- 7.2.1 Chapter 13 (Noise and Vibration) along with the Noise Addendum identifies that some residential property will be subject to adverse and significant adverse impacts. As a result of this some properties that are subject to existing road traffic and industrial noise may benefit from secondary acoustic double glazing that, were the development not in place, would not otherwise be available.
- 7.2.2 Any transport-related benefits in terms of noise and vibration that may have occurred at Gailey roundabout at the A5/A449 junction as a result of traffic using the new proposed road from the A5 to the A449 is likely to be offset by the increase in traffic generally as a result of the traffic generated by the development.
- 7.2.3 There are no other elements of the development that can be described as having a positive impact since the development is a new development and will introduce new sources of noise and vibration and into the area. None of the embedded mitigation measures has any benefit to existing sources of noise and vibration.
- 7.2.4 SSDC and Four Ashes Ltd expect to agree a Statement of Common Ground and that the development meets the requirements of the NPS.

7.3 Air Quality

7.3.1 Potential Positive Air Quality Impacts

- 7.3.2 There are no elements of the development that can be described as having a positive impact since the development is a new development and will introduce new sources of air pollution into the area. None of the embedded mitigation measures has any benefit to existing sources of air pollution.
- 7.3.3 Any transport-related benefits in terms of air pollution that may have occurred at Gailey roundabout at the A5/A449 junction as a result of traffic using the new proposed road from the A5 to the A449 is likely to be offset by the increase in traffic generally as a result of the traffic generated by the development.
- 7.3.4 SSDC and Four Ashes Ltd have agreed a Statement of Common/Uncommon Ground and that the development meets the requirements of the NPS for the SSDC District. SSDC cannot comment if this is the case for other local authority areas.

7.4. Lighting Impacts

There are no elements of the development that can be described as having a positive impact since the development is a new development and will introduce new sources of light pollution into the area. None of the embedded mitigation measures has any benefit to existing sources of light pollution.

8. NEUTRAL IMPACTS OF WMI

8.1 Conservation Impacts

- 8.1.1 The site runs alongside (and includes part of) the Staffordshire and Worcestershire Canal Conservation Area.
- 8.1.2 The proposed scheme appears to keep the built form of the site away from the canal itself, and indeed doesn't involve construction as close to the canal as other sites on the stretch of canal between Gravelly Way Bridge and Calf Heath Bridge. The east side of the canal between Gravelly Way Bridge and Gailey Wharf is to be heavily planted to provide screening of the new road and buildings 4010 and 3030. The nature of this screening will be important to the impact upon the canal conservation area.
- 8.1.3 As well as the conservation area, there are two listed buildings within close proximity of the development site;
- The Round House, Watling Street – Grade 2 LB dating to the 18th Century.
 - Wharf Cottage, Watling Street – Grade 2 LB dating to c.1800.

Both of these structures form an important part of the setting of Gailey Wharf, which is very prominent on the A5. Whilst there is no built form proposed in the immediate vicinity of these buildings, the scale of the proposed buildings would imply that they will be visible within views of the listed buildings from the main road and canal. Care will need to be taken with regard to ensuring that the new buildings do not impact upon the setting of these designated heritage assets. The heights of buildings 2010, 3030 and 4010 will be important in relation to these views.

- 8.1.4 There is only one point where the new road crosses the conservation area. The new bridge will be close to Gravelly Way bridge, and will be of substantial size to cope with the traffic movements associated with the interchange. Details of the design of the bridge and the proposed materials will be vitally important to minimise the impact of the new works on the conservation area.
- 8.1.5 There will also be potential archaeological impacts of the proposed works with a substantial complex of scheduled monuments less than 1km to the west of the development site, these include:
- Roman Villa 300m NW of Engleton Hall
 - Site of Pennocrucium (Romano-British Settlement)
 - Roman Fort W of Eaton House
 - Camp NE of Stretton Mill
 - Two Roman camps N of Water Eaton
 - Roman camp at Kinvaston

8.1.6 Whilst these are all outside the area of the development site, they show the importance of the area in the Roman period. There are to be works on and immediately adjacent to the A5 itself (Watling Street), and there is the potential for archaeological finds of the Roman period within the site. Early consultation with Staffordshire County Council Historic Environment Team will be essential in this case.

9.0 CONCLUSIONS

- 9.1 It will be clear from the foregoing analysis of impacts of the WMI Strategic Rail Freight Interchange (SRFI) that, substantial weight must be given to the harm caused to the Green Belt by reason of inappropriateness, loss of openness and encroachment into the countryside. This is clearly a negative impact of the WMI scheme. The perceived loss of openness across the 300 hectare WMI site will give rise to visual harm when the large warehouse buildings are viewed from public viewpoints that include roads/footways, bridges, the canal and one public footpath. These are clearly negative impacts.
- 9.2 Increased traffic generation [particularly HGVs] is potentially a negative impact unless satisfactorily mitigated. A consequence of increased HGV movements is the issue of increased demand for overnight lorry parking. If this is not addressed then the consequence is a negative impact on the residential amenities of local residents through overnight lorry parking in a limited number of laybys and other inappropriate locations.
- 9.5 SSDC recognizes that the WMI scheme will deliver economic benefits at a local, regional and national level. It is also accepted that on a larger than local scale [sub-regionally, regionally and nationally] benefits will arise from the WMI scheme due to reductions in congestion and air quality impacts associated with the existing Strategic Road Network [SRN] and in particular the Motorway Network through the West Midlands conurbation because of the modal shift of goods travelling in HGVs to rail. Having said that, the volume of goods travelling by train will be a low proportion [possibly 25%] of all HGV movements associated with the proposed SRFI and this will also result in an increase in traffic movements locally. These benefits amount to positive impacts of the WMI scheme.

SOUTH STAFFORDSHIRE DISTRICT COUNCIL

5.4.19