



Written Representation [WR] by South Staffordshire District Council [SSDC] – (to be submitted by email to WMIInterchange@pins.gsi.gov.uk)

April 2019

PINs Case Ref: TR050005

IP Ref: 20015762

Application by Four Ashes Ltd [FAL] for an Order Granting Development Consent for the West Midlands Strategic Rail Freight Interchange

1. The Council is opposed to the WMI Scheme. The nature and (sheer) scale of the proposed West Midlands Interchange (WMI) development causes significant concerns for the Council. The larger the scale then the increased significance of the harmful impacts.
2. The following paragraphs identify issues that SSDC wishes to bring to the attention of the Examining Authority (EA). These are set out under the headings of:
 - Planning Policy
 - Highways & Cumulative Impact
 - Visual Impact & Landscape
 - Local Economy & Employment and
 - Noise & Air Quality.

Planning Policy

3. The National Networks National Policy Statement [NNNPS] 2014 is the primary national policy guidance relevant to nationally significant transport related infrastructure projects. This includes specific reference to Strategic Rail Freight Interchanges (SRFIs). However, proposed schemes must be considered as a whole to ensure that they are assessed in accordance with all regulatory regimes.
4. NNNPS recognises a need for development on the national networks to support national and local economic growth and regeneration, particularly in the most disadvantaged areas (NNNPS Paragraph 2.5). NNNPS seeks an expanded network of SRFI across all regions of the UK (given that the freight forecasts indicate that new rail freight interchanges in areas poorly served would be likely to attract business new to rail (NNNPS Paragraph 2.50)). The Council accepts that there is a gap in the



provision of SRFI in the North Western part of the West Midlands conurbation (serving the Black Country in particular).

5. The WMI Site is located in the West Midlands Green Belt. The proposed development, by definition, is inappropriate within the Green Belt. In addition, the introduction of built development into an area of countryside (where there is currently an absence of buildings) would cause harm by loss of openness. Openness is one of the fundamental characteristics of Green Belts. The proposed scheme also engages one of the 5 purposes of including land in Green Belts. This is the safeguarding of the countryside from encroachment (which will happen if WMI achieves consent). NNNPS [Paragraph 5.178] makes it clear that the Secretary of State will need to assess whether there are very special circumstances (VSC) to justify inappropriate development within the Green Belt and makes it clear that the proposed VSC must *clearly outweigh the potential harm to the Green Belt and any other harm*. It is the Council's case that the scheme does not meet that test.
6. NNNPS considers that there is a 'compelling need' to establish a network of SRFI across the UK [NNNPS Paragraph 2.56]. The existence of a 'compelling need' is capable of providing the VSC to clearly outweigh Green Belt harm. The Council considers that the rail connection of the WMI scheme [rail primacy] is the element that distinguishes the WMI scheme from being simply an introduction of storage and distribution sheds into this Green Belt area. For the avoidance of doubt the Council considers that the absence of a rail connection [rail primacy] would remove the VSC necessary to justify the development in this Green Belt location, in other words without certainty of the rail connection (and rail primacy) there would be no justification whatsoever in policy terms, in any event the Council's view is that even with the rail connection the test set out in Paragraph 5.178 is not met.
7. SSDC considers that *if* the WMI proposal is to proceed that it is critical that:
 - there is certainty that the rail connection will be delivered
 - there is a clear rail delivery programme with detailed timings and that this is evidence based
 - the rail infrastructure is delivered first
8. In considering the WMI proposal the Examining Authority and the Secretary of State are required to take into account potential benefits, adverse impacts and measures to compensate for these. In doing so consideration should be afforded to environmental, safety, social and economic benefits and adverse impacts at national, regional and local levels – with respect to the latter the Development Plan [which sets out local policies and proposals] should be afforded consideration.
9. The Development Plan for South Staffordshire comprises the Core Strategy [adopted in December 2012] and the Site Allocations Document [SAD] (adopted in September 2018). There are also adopted plans for Minerals and Waste that are prepared by Staffordshire County Council. In September 2018 SSDC released an Issues & Options Consultation Document for its Local Plan Review.

10. 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. However, this proposal represents a significant increase in employment provision which would inevitably lead to increased pressure on housing over and above provision being planned for in SSDC's emerging Local Plan Review [Issues & Options Consultation Document Paragraphs 3.8, 3.21 & 4.26-4.27].
11. The introduction of a large scale employment development in this location will skew the balance of land uses in the local area which will not be mitigated by the WMI scheme. There is no ready supply of labour for the proposed development within South Staffordshire and that is highly likely to lead to significant pressures to increase the housing supply in the District which will in turn lead to greater impact on the Green Belt, as 80% of South Staffordshire is Green Belt.
12. SSDC continues to have concerns [as expressed in response to Stage 2 Consultation letter to Peter Frost 17 August 2017 - attached at Appendix 1] about the sheer scale of these proposals. We assert that the clear physical boundary of Vicarage Road should not be breached. We consider that there is no demonstrable need for the site to be 'stretched' in this south-easterly direction and should be justified by evidence of viability. The quantum of additional floorspace that the WMI proposal achieves in this part of the site (south-east of Vicarage Road) appears small (with significant areas of landscaping buffer).

Highways & Cumulative Impact

13. Highways and the impact of traffic generated by the development causes serious concerns for SSDC. We recognise that SSDC is not the local highway authority and that traffic modelling exercises have been carried out by Four Ashes Ltd and evaluated by Highways England and County Highways. However, SSDC draws attention to the amount of development that is planned for within a relatively small geographic area and will impact on highways (through traffic congestion) and local residential amenities. Other significant traffic generators include a new retail complex at Mill Green, Cannock [Designer Outlet opening in 2020] and the i54 and Royal Ordnance Factory [ROF], in South Staffordshire. Extensions to i54 and ROF are proposed within the adopted Site Allocations Document [SAD] – Policy SAD 5 Employment Land Allocations. The potential impact includes the cumulative impact during the construction phase as well as, if approved, when the WMI site is operational.

14. The WMI site is located close to the Strategic Road Network (SRN) and this will enable Heavy Goods Vehicles (in particular) and cars to utilise the network. However, we are concerned when the SRN experiences traffic congestion and indeed road closures [in particular the M6]. Closures and congestion inevitably lead to traffic seeking alternative routes. This leads to 'rat-running' through the network of narrow rural lanes that form an important part of the character and local environs of the area that surrounds the WMI site. Local residents living in these areas would then suffer noise, disturbance and reductions in air quality arising from the rat-running. On occasions when the M6 is closed Penkridge suffers from this type of impact from HGVs. This results in harm to the quality of life of local residents.
15. 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 WMI 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.
15. 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].

Visual Impact & Landscape

16. This is an urban form of development that will be introduced into an area that is rural in character with countryside (and an absence of built development) being the predominant existing character. This area of countryside has special protection because it is located within the West Midlands Green Belt. The WMI site and its environs have a tranquil character and is traversed by the Staffordshire & Worcestershire Canal and its rural environs. The WMI site includes veteran trees, ancient hedgerows and supports a diverse range of fauna and flora. Visually, this 24 hour operation and the amount of built development will be seen from a wide surrounding area (with light pollution being highly noticeable despite measures to reduce the impact of a 'halo' effect). Audibly the nature of a rail freight interchange will give rise to noise disturbance for local residents and this will include vibration

particularly during the construction phases.

17. 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.

Local Economy & Employment

18. Unemployment is low in South Staffordshire and economically active residents are generally employed in in skilled jobs. The nature of employment at a rail freight interchanges (with a number of sheds used for storage and distribution purposes) will be low skilled. This means that the labour force is likely to be travelling from farther afield – the Black Country, Cannock and the North Staffordshire conurbation for example. If travelling to work by private cars then this will place pressure on the surrounding highway network unless measures are enforced for buses [provided by occupiers of the WMI, improved public transport or car sharing schemes. Alternatively (and perhaps inevitably) the WMI will increase pressure on the Council to provide more housing (locally) through our emerging Local Plan Review [Issues & Options Consultation Document Paragraphs 3.8 & 3.21].

Noise & Air Quality

19. In terms of noise issues the objections of the Council have been addressed through the proposed mitigation scheme, provided that these are included within the proposed development consent obligation and provided that the statutory nuisance scheme continues to operate.
20. In terms of air quality the concerns of the Council have been addressed as they relate to the District.

Conclusion

21. For the reasons set out above SSDC, as local planning authority, is opposed to the WMI development.