



Date: 17 August 2017

Please ask for: Andy Johnson

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Dear Mr Frost

**Proposed Strategic Rail Freight Interchange (SRFI), Four Ashes,
Gailey, South Staffordshire**

Thank you for your letter dated 04 July 2017, informing the Council of the Stage 2 (Statutory) Consultation in respect of a proposed Rail Freight Interchange at Four Ashes, South Staffordshire. This response is an Individual Decision of Cllr Bob McCardle (Cabinet Member Planning & Business Enterprise) and has been made following scrutiny by the Council's Overview & Scrutiny Committee on Tuesday 15 August 2017.

I attach for information, the Council's Interim Position Statement that we published as a result of your earlier Stage 1 (non-statutory) Consultation in July 2016. It is our intention to re-visit this interim response to consider whether it should be amended/revised at the time when you formally submit the intended Development Consent Order (DCO) application. Under the Planning Act 2008 [Section 56], we note that we would have a minimum of 28 days to do so following your formal notification that the Planning Inspectorate (PINs) has accepted your DCO application. At this Stage 2 Consultation, the Council consider that it would be appropriate to make some comments on your proposals.

The Council notes that your proposals have been amended following comments received at the Stage 1 Consultation during July 2016 (and we also appreciate the fact that you have engaged with Members and Officers of District & County and sought to provide further information/clarification to



points raised and in some cases amend your proposals). We recognise that the terms of the Planning Act 2008 require the front-loading of negotiations and engagement (prior to the formal submission of the DCO application).

We remain extremely concerned as I am sure you will appreciate, about the sheer scale of the proposal, which would result in the loss of nearly 300 hectares of Green Belt land from South Staffordshire. The Council has a strong commitment to the protection of South Staffordshire's Green Belt in our adopted Core Strategy 2006-2028 and the Council Plan 2016-2020. The National Planning Policy Framework (NPPF), and Policy GB1 of our adopted Core Strategy, require very special circumstances to be demonstrated which clearly outweighs the harm to Green Belt and any other harm in order for your proposed development to be consented. This is a 'high hurdle' that your development proposal must jump - and in our considered opinion fails to do so.

We have considered the draft documentation that you have provided with this Stage 2 Consultation. We note that you anticipate that your development would attract approximately 60% of your future businesses from demand within the West Midlands Conurbation and 40% from elsewhere (maybe as far afield as Manchester and Merseyside). The evidence that you provide, if you decide to submit a DCO application, should be supported in our view, by an Economic Impact Analysis, which considers the implications of your proposed scale of development on existing local economies and justifies the scale of development that you are proposing.

Highways and the impact of traffic generated by this development, is another area where this Council has serious concerns. We recognise that traffic modelling has been used to assess the impact on the Strategic Road Network (SRN) and County roads. We recognise that this Council is not the local highway authority and so will be looking to County and Highways England to consider the detailed traffic modelling data/analysis that you provide. We note that your traffic modelling/analysis looks at 2021 and 2036. This will take into account the likely build programme for the whole site. We assert that if you were to apply in staggered phases (with a smaller quantum of development) over a period of time, then this would allow the impact of future developments within the area to be factored into your traffic modelling/analysis - at the time when each new phase is proposed.

We also have serious concerns about the impact of increased traffic on the residential amenities and quality of life of local residents living in locations served by rural roads/narrow lanes. We fear consequential 'rat-running', where vehicles seek alternative local roads to avoid congestion on the SRN/County roads. The 'rat-running' will result in serious loss of residential amenity for our local residents.

The proposed development 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 your proposed development.

You have acknowledged that phasing will be important (and the build programme could take at least 15 years to complete). This raises a number of concerns. How can we be sure that a rail-connected outcome will be delivered (rather than a series of storage and distribution [B8] sheds that are motorway-served)? In addition, the blight that local residents would suffer will be spread over a number of years and could be worse at different times depending on the nature of the building works.

We have raised with you our concerns about the sheer scale of these proposals. We ask again that you re-consider your desire to breach the clear physical boundary of Vicarage Road. 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 your proposal achieves in this part of the site (south-east of Vicarage Road) appears small (with significant areas of landscaping buffer).

Ecology input to your proposal has been provided by the County Council. We are content with this approach however; we do ask that you clarify how the impact of your development on local wildlife (fauna and flora) will be managed. We understand that some developments (of the nature and scale that you propose) acquire land in the local area where species can be re-located in order to mitigate the impact of the development. This approach was taken recently at i54 South Staffordshire (albeit a smaller 90ha site). We anticipate that you may be planning to use the phasing programme to provide 'holding areas' that can then be finally re-located to the proposed community park(s). Please confirm if this is your intention.

In this letter of comment to the Stage 2 Consultation, we have highlighted some of the principal concerns that we have with the proposed development. We intend to provide a more detailed assessment in the Local Impact Report (LIR) that the Council will submit to PINs when your DCO application has been formally submitted (and accepted by PINs). Our LIR will take account of, and seek to address, the principal issues identified by the Examination in Public (EiP) Panel in due course.

We ask that you give careful consideration to the principal concerns that we raise in this letter.

Yours sincerely



Andy Johnson

Chief Planning Officer

Cc Mrs Sue Wilcox – Quod Planning Consultancy