

**WRITTEN REPRESENTATION ON BEHALF OF SHOAL HILL JOINT
COMMITTEE**

**REGARDING THE PROPOSED WEST MIDLANDS INTERCHANGE
AT GAILEY, SOUTH STAFFORDSHIRE**

5 APRIL 2019

1. This representation is made on behalf of the Shoal Hill Joint Committee and is in addition to the representation made on 29 October 2018.
2. The Joint Committee remains deeply concerned by the proposed development.
3. Shoal Hill Common is part of the Cannock Chase AONB.

Landscape

4. The Joint Committee considers that the proposed development will have a significant impact on views from Shoal Hill Common and ultimately its setting, particularly as a result of the fact that Shoal Hill is on an elevated location.
5. The development will spoil the current uninterrupted view all the way to the Clee Hills in Shropshire
6. The Applicant contends that there is a 'Moderate Adverse'¹ Significance of Impact for Shoal Hill Common both in terms of during construction and on completion. The Joint Committee submits that this is misleading. The existing development of the Incinerator at Four Ashes is already clearly visible from Shoal Hill and the proposed development is substantially larger and will have

¹ See para 12.293 and para 12.449 of the Environmental Statement Main report

a much more significant impact on the setting of Shoal Hill Common.

7. It is submitted that the proposed mitigation through earthworks and natural landscaping such as trees/other vegetation would have a limited effect. This is as:

a) any vegetation would take a significant number of years to reach maturity

b) they would be unlikely to mitigate the impact of the lighting from the site – the current landscape is largely unlit and therefore the light pollution caused for the community as a whole would be significant. The Joint Committee argues that the current situation is intrinsically a dark landscape as per para 5.87 of the National Policy Statement on National Networks (“NPSNN”)

8. It is the Joint Committee’s position that in accordance with para 5.154 of the NPSNN the duty to have regard to the purposes of nationally designated areas also applies, and that this development is likely to have an impact on the AONB, in particular Shoal Hill. The Joint Committee remains concerned that there is a visual impact and impact to the setting of the Common.

9. As stated previously the Joint Committee considers that the photo montages produced by the applicants to fail to demonstrate effectively the true impact of the proposed development and therefore invites the Examining Authority to survey the landscape from Shoal Hill as per the attached map.

Size and scale of the development

10. The Joint Committee remains concerned by the proposed size and scale of the development which is completely out of context for the area.

11. The Joint Committee notes again that the land is Green Belt and argues that the harm to the Green Belt (including harm to the landscape and setting) and any other harm is not clearly outweighed by the stated very special circumstances, in line with para 5.178 of NPSNN.

Shoal Hill Joint Committee

5th April 2019

Shoal Hill Common Site Visits

