

22 July 2016

Dear Sirs

## **WEST MIDLANDS INTERCHANGE**

Thank you for consulting Staffordshire County Council on your proposals for a Strategic Rail Freight Interchange (SRFI) at Four Ashes. We recognise that the proposal is still a work in progress and appreciate the opportunity provided to comment on the emerging scheme. We would also wish to maintain a close dialogue with you as the technical work progresses and the drafting of the Development Consent Order.

We note that in the consultation overview document Four Ashes Limited have set out a Mission Statement for the development. The commitment to community interests and environmental considerations is commended and we trust will be seen through the entire development process.

We are aware that local residents have queried why the site in question has been chosen. This is considered in section 2.11 to 2.15 of the overview document however it is noted that this is primarily focused on setting out the benefits of the proposed site and gives little indication of what other sites were considered and ruled out. At 2.12 you state that your search focused on the area to the North West of greater Birmingham due to the findings of previous independent research by public bodies. We would query this statement as the Black Country and southern Staffordshire - Regional Logistics Site Study<sup>1</sup> found that *'identifying Black Country and southern Staffordshire alone is a spurious boundary for an area of search. Previous studies looked at RLS provision in relation to the West Midlands and considering southern Staffordshire in isolation fails to appreciate to what extent other areas in the West Midlands including north Staffordshire could meet need'*. We would therefore wish to see further detail here and justification on how the site was selected and what other sites were considered and subsequently ruled out.

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<sup>1</sup> Black Country and southern Staffordshire Regional Logistics Site Study - Final Report April 2013 URS.

Prepared for:

Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council, Staffordshire County Council, South Staffordshire District Council, CENTRO, Cannock Chase District Council, Stafford Borough Council, Lichfield District Council and Tamworth Borough Council



In relation to the two rail terminal options comments will be provided later on each. Regardless of which option is ultimately taken forward we would be keen to understand how the rail terminal itself and link to the West Coast Main Line are to be phased into the development? The issue being that until the rail freight terminal is operational any logistics use on site will be purely road based.

At this stage there is no information on the phasing by which the site will be constructed and at what point the rail terminal will become operational. This will be an important consideration in assessment of impacts and practicalities of delivery. We would wish to understand how existing businesses in the locality, in particular off Gravely Way, may be affected during construction.

We have separated out our remaining comments by theme under the headings that follow.

## **Transport and Highways**

Transport and highway matters will be of significant importance in the proposal and in order to form an opinion we will need to understand clearly what the transport implications are. To begin with we will need details on what the traffic generation and distribution for the proposal is likely to be. This will be required for the completed development and at various phases throughout the development dependent of what they may be. Given the size of the proposal we will also need to understand the traffic impact of the construction of the development.

Our Highway and Transport officers will be liaising directly with your transport consultants on the scope and content of the Transport Assessment that will need to be prepared and any other detailed technical assessments and designs. Some discussions have already taken place and we hope that a continued open dialogue is maintained throughout both the pre-application and application stages of the proposal. We are aware that a request to meet to discuss the scope of the Transport Assessment towards the end of the month. We would suggest that this meeting would be better timed after the Stage 1 consultation has closed and you have had chance to digest the feedback as this may assist the TA scoping discussion. The following therefore provides, on a without prejudice basis, a brief, largely non-technical, summary of the likely issues that will need to be addressed from the information supplied in the Stage 1 consultation.

Before going into comments on the WMI proposal we are minded to note that the A5 and A449 fronting the site are currently Trunk Roads under the control of Highways England (HE) as they provide a strategic connection between the M54 and M6 (northbound). The Department for Transport is promoting a new M54/M6(M6 Toll) link road to provide full north and south connectivity between the two motorways. This in the future may negate the need for the sections of the A449 and A5 between M54 J2 and M6 J12 to remain as trunk road. With this potential for detrunking it is requested that any impacts, mitigation and design work for these two 'A' roads is discussed with and agreed jointly by both HE and Staffordshire County Council. The drafting of the Order should also therefore have regard to these roads potentially being under the control of a different highway authority in the future.

Understanding the local traffic and transport impacts of the proposed scheme will be of exceptional importance and should be given due regard. Whilst it is agreed that at a national level SRFI's will lead to a reduction in HGV vehicle mileage overall; at a local level there will be a significant increase in HGV trips and other trips (e.g. employees and other

movements associated with the operation of the site) wherever a SRFI is located. At present there is an apparent perception that the benefit of the national HGV traffic mileage reduction is being overplayed against the local traffic impact. At the last member briefing County Councillor Sutton raised a query regarding increased HGV traffic around the site and was provided with a technical response around what constitutes 'new' traffic that did not really address the point raised. It is acknowledged that the SRFI will provide logistics services for goods that are already being distributed around the country, so the traffic associated with those movements already exists on the road network. However, very little of that will exist presently around the proposed WMI site. This point can be articulated using diagram 1 of your transport technical note (pg 12) under the section 'HGV Mileage Reduction'. In this diagram freight using route A to get between origin and destination currently has no impact on the road network around the proposed WMI site. However, if WMI was to become operational then road based distribution would have new origin/destination of WMI and HGV trips would be using roads that previously they did not. Therefore, whilst at a national level it could be considered that HGV traffic associated with WMI already exists the development of the site will relocate this traffic. This in reality will mean there will be more HGV traffic using roads around the proposed WMI site than there had been previously. We would request therefore that the future transport assessments clearly articulate what traffic levels in the vicinity of the site are likely to be with the WMI compared to the level that currently exists (taking account of other committed development).

We are aware of issues in the past with HGV parking in and around the area that we have had to address. We would therefore suggest that an assessment needs to be undertaken in this regard and we would be keen to understand what provision will be made on the site for HGV parking. We are also aware that there are a number of existing facilities locally for HGV drivers (truck stops). These facilities are likely to experience increased demand for their services if WMI is built out due to increased volume of HGV's. We would therefore suggest that an assessment is required of the capacity of these facilities and the impact of increased usage of the accesses in relation to safety, capacity and effect on free flow of through traffic on the main road.

Section 4 of the Transport technical note sets out the Local Transport Conditions, which in the main are matters of fact. However, at 4.11 you refer to observations and reports that point to the A5 and A449 operating acceptably for most of the time. Please could these reports be provided and confirmation of what you deem to be 'acceptable'? In paragraph 4.13 of the report you begin to introduce the impact of WMI on the road network and conclude with minor mitigation it should be possible to ensure the M6 J12 and other local junctions and links will operate acceptably once WMI is operational. We fail to see how such a statement can be made at this stage without first having undertaken a full and comprehensive assessment of the traffic impact and second establishing a clear understanding of the opportunities/constraints that exist at junctions and links in relation to any mitigation schemes. This again brings us back to the point about the perception of the local road traffic impacts being under played. Section 4.14 provides a more accurate description of the process to be followed but the intent has been somewhat undermined by the previous paragraph.

Section 5 of the transport technical note sets out the rail access to the site in relation to the rail interchange. One would have assumed that occupiers of a SRFI would have preferred a unit with direct access to the rail terminal, which in turn would make usage of rail based freight more likely. The statement in paragraph 5.4 would seem to suggest otherwise and

thus lean towards favouring the West terminal option. However, there is no evidence to support this claim in the technical note. It may be the case that occupiers of existing SRFI's have merely taken the units that were available but equally we have no evidence to support this claim. It is suggested therefore that moving forward evidence to support what potential occupiers of an SRFI would prefer in relation to access to the rail terminal should be sought.

Section 6 of the transport technical note sets out the Road access to the site and provides an indicative location for the three general access routes via A5, A449 and Vicarage Road. All of these three accesses at present are proposed in the form of roundabouts. However, until the traffic generation and turning movements are established it is not possible to comment yet to the acceptability or otherwise of the proposed junctions. We will continue to work with you on this as the scheme evolves and assessments are undertaken.

Both of the proposed terminal options include a road within the site linking the A5 and A449 via Gravelly Way. The transport technical note makes no reference to the existing road bridge over the West Coast Main Line that currently operates under signal control shuttle working. We will need to understand fully the impact on this section of highway and what proposals may need to be put in place. If works are required to the bridge or its reconstruction then we would need to understand how they could be undertaken without affecting the businesses that currently operate out of the existing premises off Gravelly Way. We would need to understand how the development would be phased and what any interim impacts may be until such time as all the access points are fully completed.

In relation to any highway improvements and new road construction the County Council would wish to agree the design for any proposed highway improvements and agree the construction of any features. We would also want to have a full understanding of the mechanism by which highway works would be delivered via the DCO. We have experienced issues post permission with delivery of works secured via the model provisions as the developers contractors were unfamiliar with the process and subsequently queried why the usual highway agreements e.g. S278/S38 could not have been utilised.

In relation to public rights of way we acknowledge that the documents clearly recognise the existence of Public Footpath No 29 Penkrudge which crosses part of the site. The Transport Technical Note states that this will probably need to be diverted through a landscaped area to the north to allow the development to take place. We would expect the diverted route to be a minimum of two metres in width and on a firm crushed stone or tarmac surface depending on the landscaping of the wider site. We would not expect any landscape planting to impact on the public right of way and any trees or bushes should be planted a minimum of 3 metres away from the public path. The maintenance of any trees planted near to the public right of way will be the responsibility of any subsequent landowner. If a diversion is required any new route should be aesthetically pleasing to path users. The County Council can comment and advise further once details about the route of any proposed diversion are provided.

The greatest impact from the development on walkers/ramblers is likely to be on users of the Staffordshire and Worcester canal towpath that runs through the application site. The County Council does not have any responsibility for the towpath but recognise the importance and value of the canal network to walkers. The proposed scheme has the potential to industrialise an area of Staffordshire countryside and every effort should be

made by the developer to lessen the impact of the scheme in order to retain an attractive, rural feel for users of the rural access network.

The document does not recognise the application submitted under Section 53 of the Wildlife and Countryside Act 1981 to add a Byway Open to All Traffic (BOAT) to the Definitive Map of Public Rights of Way which affects the land in question. This application under section 53 of the Wildlife and Countryside Act 1981 is to add a route to the Definitive Map as a Byway open to all Traffic running from the A449 opposite Crateford Lane to Gravelly Way Bridge, and is based upon historical evidence. The application can be viewed on the County Council's Register of Modification Order Applications at <https://apps2.staffordshire.gov.uk/SCC/PROW/> and found using file reference LH626G. According to the applicant the Deposited Railway Plan and Book of Reference of the Grand Junction Railway 1832, held at the Stafford Record Office, shows the route as a "Bye Lane from Stafford Road to Gravelly Way Bridge" and the owner or reputed owner is the Surveyor of Highways. This hasn't been verified and no investigation has yet been carried out on this section 53 application. There is also an outstanding section 36 Highways Act ancient highway application for this route. Therefore, further consideration into these matters is required as the proposal moves forward.

With regards to rail it will be important in the assessment of the scheme to ensure that the provision of the rail terminal and increased freight movements do not adversely affect passenger capacity, both at current levels and with projected growth considered. We would also be keen to understand the freight pathways available and how these will be operated. Do you have an interested rail freight operator on board? In considering the operation of the rail terminal it will be necessary to demonstrate that an appropriate and efficient access from the mainline can be achieved to the site. This should also include whether either the east or west option performs better in this regard.

## **Socio Economic**

The proposal will bring with it economic benefit and jobs to the local area. We would be keen to understand the type of jobs that will be on offer and the number of likely positions in each category. What will also be important for local impact is an understanding of measures to be put into place to ensure local residents benefit fully from the job opportunities available to them should the proposal be permitted. We would therefore suggest that as part of the proposal an employment, skills and training plan is put into place to assist local residents in gaining employment at the site during both construction and operational phases. The plan should also link into the travel plan and public transport (bus) strategy to access areas where non-car ownership and restricted public transport provision is a possible barrier to accessing employment opportunities.

The National Policy Statement for National Networks sets out the Governments vision for SRFI's and within it mainly refers to SRFI's in the context of logistics although we do acknowledge that the logistics industry provides warehousing and distribution networks for UK manufacturers, importers and retailers. It is noted that your proposal may include an element of manufacturing on site. Whilst there may be benefit from a wider mix of employment opportunities on site we would need further detail on how any manufacturing element would be linked to the rail terminal and what controls could be put in place via the Development Consent Order to ensure that if there is to be any manufacturing on site it is suitable in the context of the SRFI i.e. would seek to utilise rail to distribute the goods manufactured around the UK and to export. Within this consideration must be given to the

greenbelt location to avoid B2 schemes that would otherwise be unacceptable in the greenbelt 'piggy backing' on any consent for a SRFI.

The proposed scheme when complete is estimated to create around 8,500 jobs; the assessment of impact should consider what facilities, amenities and services these workers may require locally and the extent to which they exist, for example small convenience retail, childcare provision. Could provision of such facilities and services be incorporated into the site via something like a local centre that could serve the site and extend to the wider community?

## **Landscape**

The Landscape and Visual section of the Consultation Document contains some baseline information regarding Landscape and Visual matters. The main accepted sources of information appear to be covered, and the document states that assessment will follow the methodology described in the Guidelines for Landscape and Visual Assessment, Third Edition, 2013, which is appropriate. There is no reference to assessment of night time effects, which should be included. The LVIA should be used to inform the design of the proposed development and mitigation measures.

The section correctly identifies that the site falls on the boundary between two Landscape Character Types (LCT's). West of the Staffordshire and Worcestershire Canal the site falls mainly in the character type Ancient clay farmlands in the Staffordshire Plain; to the east the character type is Settled Heathlands in Cannock Chase and Cank Wood. *Planning For Landscape Change* derived policy objectives of Landscape Maintenance and Active Landscape Conservation respectively for these LCTs, derived on the basis that the landscapes demonstrated factors such as time depth, good representation of characteristic features and features in good condition, and therefore merited a higher level of protection and sympathetic treatment. That said, much of the land to the east of the Canal is now being quarried therefore the assessment can no longer be considered to carry weight within that part of the site.

The sections provided in the Presentation to South Staffordshire are useful, however they will need to clearly state that they illustrate mature planting at a specified estimated period in the future. Additional information including heights of proposed bunds and estimated height of planting need to be provided. Additionally, for clarity, sections (including lines of sight) should also be provided to illustrate Year 1 effects. The bunds will be critical to maximising site screening, therefore their completion and planting should take place as early as possible in the construction phase. Retention of boundary hedges and trees and woodland will also be essential to maximise landscape and visual mitigation which will necessitate adequate working clearances to protect vegetation in accordance with BS5837:2012 Trees in relation to design, demolition and construction – Recommendations.

Due to the scale of the proposals substantial landscape and visual impacts are expected with either option. The East Terminal Option which requires a new rail bridge over the canal would have significant detrimental effects on the Staffordshire and Worcestershire Canal Conservation Area and users of the canal, which would be likely to negate any 'enhancement' that might be achieved through the 30 metre wide landscape planting described in the Consultation Document. This Option may also have wider visual effects at least until boundary planting has established. The West Terminal Option appears to have

less impact on the Canal and potentially the wider landscape and would therefore be preferred.

Sensitive building design will be critical to reducing landscape and visual effects, and the proposals should incorporate design measures, carefully selected materials and treatment of building facades to help to reduce the perceived scale and mass of the buildings. Use of green walls and roofs would also be beneficial in reducing effects. A landscape strategy will be required that adopts a holistic approach to landscape and visual mitigation, flood risk management, and biodiversity and landscape enhancement.

In relation to new highway access points consideration should be given to their siting in relation to hedgerow/roadside trees and avoidance of unnecessary removal. It is suggested that siting and visibility splay assessments should inform access location, design and mitigation on landscape feature around the new accesses.

## **Ecology**

In taking the proposal forward it is suggested that survey and assessment is carried out in line with Staffordshire County Council requirements for biodiversity for planning application validation, see

<http://www.staffordshire.gov.uk/environment/eLand/planners-developers/biodiversity/development/biodiversitysurvey/BiodiversitySurveyandAssessment.aspx>

In line with the National Planning Policy Framework (NPPF) and relevant legislation, the assessment should include consideration of effects on the following:

- Designated nature conservation sites, both statutory and non-statutory;
- Protected species
- Species and habitats of principal importance for biodiversity (Defra list)
- UK and Staffordshire Biodiversity Action Plan habitats and species
- Geological features

Ecological survey and assessment should follow published guidelines, e.g. CIEEM Guidelines for Ecological Impact Assessment and should be based on up-to-date information. Survey should be carried out by appropriately experienced and qualified personnel at appropriate times of year for the habitats and species covered and using published/accepted methodologies. Survey and impact assessment should be informed by records search including Staffordshire Ecological Record. The assessment should include proposals for mitigation of adverse impacts and for enhancement of biodiversity, in line with the National Planning Policy Framework. Regard should be had to how the proposal might contribute to meeting UK and Staffordshire Biodiversity Action Plan targets and to emerging national and local policy regarding Green Infrastructure and ecological connectivity. Survey proposed in s. 4.28 and 4.29 of the Consultation Overview Document and 5.67 of the Environmental Report are appropriate but survey for otters should be added as this species is recorded along the canal. Native black poplar is recorded close to the reservoirs; trees should be identified and protected. In regard of great crested newts, I would be concerned should survey be restricted to ponds with positive eDNA results only as I have seen several examples of survey where negative eDNA results have been contradicted by positive findings on survey.

Survey and assessment should not be confined to the site itself; sufficient information should be provided for this major scheme to allow assessment of impacts on wider local

ecology such as the Gailey Reservoirs and their use by birdlife, canal ecological connectivity and use of the local area by mobile species. Water Framework Directive objectives should be considered in assessment of impacts on waterways and water bodies.

In relation to the Environmental Report please note that it is good practice to keep badger survey information confidential due to persecution issues. Further documents should provide badger survey information as a confidential appendix to be provided to relevant consultees only.

It is noted that s.1.4 of the Environmental Report states that the site boundary may change. A sufficient buffer should be included in the survey area to allow for change and to enable assessment on neighbouring habitats/species.

s.5.9 of the Environmental Report states that Phase 1 habitat survey was carried out on the 23rd and 24th November 2015 and the 24<sup>th</sup> and 25th February 2016. As these are both well outside the recommended periods for habitat survey repeat surveys are strongly recommended for woodland, grasslands, arable field margins and aquatic habitats in particular. The Phase 1 Habitat map Figure 5.1 and the pond map Figure 5.2 appear to be missing.

s.5.33 identifies two Special Areas of Conservation (SAC) that will be screened for impact assessment. Consideration is also recommended of effects on the Cannock Extension Canal SAC due to potential increased traffic on the A5.

s.5.36 – as the Hedgerow Regulations do not relate well to Staffordshire hedgerows, use of the HEGS scheme for hedgerow assessment is recommended and consideration of their status as Biodiversity Action Plan/habitat of principal importance. It is also recommended that biological and cultural assessment of hedgerows be combined rather than recorded and discussed separately.

As the Environmental Report notes, there are no designated biodiversity sites within the scheme area but a number close to the site. In particular, Gailey Reservoirs Site of Biological Importance (SBI) is adjacent to the site. Buffers to the site and assessment of the impact of the proposal on bird species using the Reservoirs will be required. The site is close to, but unlikely to impact on, Four Ashes Pit geological SSSI. Discussions are recommended with Natural England to establish whether there is potential to offer enhancement to the SSSI and its scientific and educational function as a part of biodiversity compensation or enhancement.

Both options involve substantial loss of Calf Heath Woodland much of which is likely to be a habitat of principal importance (Natural Environment and Rural Communities Act 2006 s.40). A network of hedgerows with associated small ponds, is present, some of which may be habitat of importance and which provide habitat for farmland and woodland birds, bats and other wildlife. NPPF paragraph 109 and Local Plan Policy EQ1: Protecting, Enhancing and Expanding Natural Assets indicate that should this loss be unavoidable compensation will be required on or off site comprising provision of replacement habitat, taking into account ecological connectivity.

The site is located within the Staffordshire Biodiversity Action Plan Central Farmland Ecosystem Area where priorities include hedgerows, woodland and ponds. The Staffordshire and Worcester Canal represents a wildlife corridor. The eastern option has



potential to affect connectivity due to the proposed rail and road bridge. Inclusion in the final scheme of a green infrastructure network, that relates to habitats outside of the site and provides compensation for habitat loss, is required for the development to meet NPPF and Local Plan policy. Design and lighting would need to be sensitive to the wildlife habitat and connectivity functions of the canal.

In regard of the water environment regard should be had to the Water Framework Directive and the ecological status of water courses and water bodies. There is potential to deliver ecological benefit through design of Sustainable drainage features such as attenuation ponds, reedbeds and swales with wildflower grassland planting.

Assessment will need to consider indirect impacts such as those related to any associated highways works outside of the immediate site due to local increases in HGV and other local traffic.

Stated commitment to a strong Landscape and Green Infrastructure Strategy is noted and welcomed as being in accordance with NPPF and Local Plan policy. Measures proposed in the Consultation Overview Document s.3.12 for green infrastructure and biodiversity would provide a degree of mitigation and compensation for woodland and hedgerows network habitat losses. Mitigation of impacts on species of the arable landscape will be difficult or impossible on site; therefore off-site measures should be considered through biodiversity offsetting or other methods. As design and layout evolve these green infrastructure measures should be retained and design developed to include as much mitigation and compensation as possible for lost habitats and affected species.

In relation to the Terminal Options, both illustrative options involve substantial impacts on Calf Heath Wood, with small areas retained. Both options include a green infrastructure network composed of woodland planting and attenuation basins and swales though this is severed by highways and rail infrastructure. Should this be well designed in regard of ecology it could provide for some compensation of loss of the existing woodland and hedgerow network. In order to assess the capacity of the proposed green infrastructure to provide ecological habitats and connectivity information will be required on levels of rail and highways infrastructure and other land and on lighting design and location. Inclusion of dark corridors, especially along the canal, is desirable.

## **Historic Environment**

It is disappointing to note that the Consultation Overview Document – Stage 1 Consultation (June 2016) does not consider the historic environment as a separate issue under Environmental Characteristics and Potential Impacts (section 5.) but instead includes it in ‘Other Environmental Considerations’ (section 5.8). Bearing in mind the schemes proximity to a number of designated heritage assets, its overall land take and the demonstrable archaeological potential for the site, this approach is of concern and it is suggested that future consultation summary documentation should give specific regard to the historic environment. However, the approach of the Environmental Report and supporting documentation regarding ‘Cultural Heritage and Archaeology’ is to be welcomed. This document recognises the broad archaeological and historical potential both within the site itself and also from the wider landscape; this wider contextual understanding has in turn been used to inform its view of archaeological potential within the site.

The potential late prehistoric remains that have been identified within the baseline data section (sections 4.20 and 4.21) of the Environmental Report are not flagged as sensitive receptors within section 4.48, while the potential for 'unidentified buried archaeological remains...' is considered here. It is argued that these cropmark remains have demonstrable potential and should be considered as 'sensitive receptors'. Notably, Historic England does not appear to have been consulted in the preparation of the Environmental Report regarding potential impacts upon Scheduled Monuments. If this has not happened to date it is strongly advised that it take place at the earliest opportunity.

The early nature of the Environmental report is noted and it is advised that a formal Historic Environment Desk-Based Assessment (HEDBA) be undertaken to inform the EIA process. The HEDBA should consider the full range of historic and archaeological data (whose format is detailed in the Chartered Institute for Archaeologists (CIfA) standards and guidance for '*Historic Environment Desk-Based Assessment*' (2014)) and should include reference to all available historic mapping sources, historic illustrations/engravings, aerial photos (vertical and oblique) and lidar for the study area. This work should be undertaken by an appropriately experienced individual/organisation working to the aforementioned standard and guidance.

The Environmental Report identifies important hedgerows under the amended Hedgerow Regulations criteria (2002) but does not consider field boundary loss as a function of the sites historic landscape character or link aspects of historic landscape character to other heritage assets within the study area (i.e. parkland, farmsteads); the HEDBA should also address these issues. It is also strongly advised that the Historic Environment Consultants liaise closely with the applicants other specialist consultants (in particular where the Landscape and Visual Assessment is concerned). This liaison on landscape issues should continue, where appropriate, into the design of the detailed landscape design for the scheme.

The historic environment consultants should also address the potential for palaeoenvironmental and geoarchaeological remains across the site. As such they should liaise with the applicants Site Investigations (SI) consultants to inform the location of boreholes and window samples to maximise the potential for the recovery of data which will also be of use in developing an understanding of the palaeoenvironmental and geoarchaeological potential for the site. Where appropriate, an archaeological watching brief should be conducted in concert with SI works; these results of this may form part of the HEDBA or may be submitted for consideration as a separate document.

The results of this initial work will inform early discussions regarding the potential for preservation *in situ* of sensitive heritage assets, the role of considered design in protecting and (where possible) enhancing historic landscape character as well as the scope and staging of archaeological evaluation/mitigation across the area of the scheme.

## **Surface Water Flood Risk and SuDS**

At this stage the Environmental report presents some outline information relating to the water environment and identifies the detailed work that will need to be undertaken during subsequent stages of the assessment and design process.

The Environmental Report states that a Flood Risk Assessment (FRA) will be prepared to assess the risk of flooding to and from the Site in accordance with the requirements of the

National Planning Policy Framework (NPPF). This will form part of the EIA, as an appendix to the main ES.

The Environmental Report also notes that as the Lead Local Flood Authority (LLFA), Staffordshire County Council (SCC) are responsible for approving surface water drainage strategies for new development within Staffordshire. The Surface Water Drainage Strategy should demonstrate how surface water will be managed in accordance with the Non-statutory Technical Standards for Sustainable Drainage Systems (Defra, March 2015) and the best practice guidance set out in The SuDS Manual (CIRIA 756).

Staffordshire County Council is in the process of preparing a SuDS Handbook that sets out both national and local requirements for SuDS, which will be available on our website. This recommends that SuDS should be designed to work with the natural and historic drainage patterns of a site. Therefore, when designing the layout of the site the analysis should begin with an assessment of the topography, geology, soils, and drainage features on and adjacent to the site, and ensure that the natural drainage characteristics are maintained with no increase in flood risk to others.

Both terminal layout options illustrate the intention to include water attenuation lagoons and swales. These should be designed around the natural drainage patterns of the site and locality. The Environmental Report (Paragraph 10.26) identifies the presence of several ordinary watercourses, drainage ditches and land drains within and adjacent to the Site. In particular there is an ordinary watercourse in the north-west of the site which, in both layout options, may potentially conflict with proposed units and infrastructure as illustrated. The LLFA will expect natural drainage features on a site should be maintained and enhanced. Culverting of open watercourses will not normally be permitted except where essential to allow highways and / or other infrastructure to cross. In such cases culverts should be designed in accordance with CIRIA's Culvert design and operation guide, (C689). Where a culverted watercourse crosses a development site, it should be reverted back to open channel. In such a case the natural conditions deemed to have existed prior to the culverting taking place should be reinstated.

Further information regarding SuDS and ordinary watercourse works that may be of assistance in taking the proposal forward is available on the County Council website: <https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/risk-management.aspx>

## **Minerals and Waste**

With regard to the Environmental Report it is noted that there is no consideration of the effects of the proposal on:

1. Mineral resources associated with the affected land (refer to section 13 of the NPPF and policy 3 of the emerging new Minerals Local Plan for Staffordshire (2015 – 2030); and
2. Existing waste management facilities in the area (refer to paragraph 8 of National Planning Policy for Waste and policies 2.4 and 2.5 of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010 – 2026).

In relation to the preparation of future reports/assessments please note that there is a requirement to assess waste generation associated with the construction of proposed

development and its use (refer to paragraph 8 of National Planning Policy for Waste and policy 1.2 of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010 – 2026).

The proposal affects an existing quarry and would affect land allocated for sand and gravel extraction in the emerging new Minerals Local Plan for Staffordshire (2015 – 2030) (refer to Policy 1 and Inset Map 7). With regard to the assessment of ground conditions (section 6 of the report), future assessment should include consideration of land where mineral extraction has taken place and is required to be restored with the disposal of waste materials to reinstate original ground levels.

## **Sustainable Energy and Climate Change**

At this stage the Environmental Plan seems to just list the risks and the relevant policies without any real solutions. Once these start to take shape we would be keen to engage further.

There appears to be very little in the Air Quality section of the consultation documents related to increased levels of Transport in the area. As the proposal progresses this should be considered in detail and whether any restrictions on emissions for vehicles using or delivering to the facility in the long term could be achieved. This should also include the construction period. Within the site movement of containers will be undertaken by bespoke vehicles can consideration be given to using vehicles powered by alternative energy? Similarly, could there be an opportunity to develop a central hub for charging electric vehicles, ensuring capacity is provided to encourage behaviour change towards renewable energy vehicles.

In relation to buildings on the site these should strive to push for sustainable exemplar buildings, using a “fabric first” approach to ensure that all of the units/warehouses are as energy efficient as possible and the materials used for construction are sustainably sourced. Simple in house things like LED lighting etc would be ideal, just improving the building standards.

To assist with the landscaping and contribution to the natural habitat, consideration could be given to green/living roof on the units, or at least replacing some of the natural environment with increased green infrastructure surrounding the units, perhaps some specific mitigation land.

In relation to Energy the proposal should consider opportunities for sustainable energy generation. Locally there is an opportunity to derive benefit from the heat and power produced by the W2R facility close by in the Four Ashes business park (provided that Veolia have not guaranteed all CHP to other customers), but we would welcome the opportunity to understand the likely power requirements of the units to continue that discussion.

Failing the availability of W2R, opportunity to develop a decentralised energy centre that feeds the entire interchange (e.g. large scale underground biomass, district heating/power system) should be explored, again improving its sustainable credentials. Furthermore, use Solar PV Panels as an option for the roof space should also be examined.

In closing we again acknowledge the opportunity provided for local residents, the County Council and other agencies to comment on the emerging scheme. It is recognised that this

round of consultation is non-statutory and was undertaken at the discretion of the promoter of the scheme. We hope that this level of engagement is continued as the scheme progresses.

Yours sincerely

James Chadwick  
Planning Policy Officer