



The countryside charity  
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Working locally and nationally to protect  
and enhance a beautiful, thriving  
countryside for everyone to value and  
enjoy.

Charity number 219443

6<sup>th</sup> February 2020

**Comments of CPRE Staffordshire (reference 20015574) on the Request for Comments of the letter dated 24 January 2020 from the Department for Transport**

In response to your letter dated the 24<sup>th</sup> January, our comments relate solely to the late representation dated 13<sup>th</sup> December 2019 from Eversheds Sutherland on behalf of the applicants.

CPRE (Staffordshire) would comment that:-

1. The Northamptonshire case referred to as a precedent was not in the Green Belt.

The proposal currently being considered by the Secretary of State is entirely within the West Midlands Green Belt. It is also understood to be the largest application within Green Belt in the whole of the United Kingdom in terms of site area, the ground coverage and height of buildings.

As the late representation from Eversheds Sutherland indicates, this initial case is likely to be cited as a precedent for further approvals in the West Midlands and other Green Belt locations elsewhere in England if the Secretary of State grants consent.

We are aware that Eversheds Sutherland may say that the Guidance of the NPPF in relation to Green Belt should not be considered since it does not include the word 'must' although it does include the word 'should' and ALSO that it is clearly intended primarily for LPAs rather than the Secretary of State -but we do not accept this and would therefore again ask that the NPPF should be considered by the Secretary of State as a major factor in his/her decision.

**National Planning Policy Framework**

(Extracts from National Planning Policy Framework (NPPF) February 2019)

Note:- Emboldening and underlining in the extract is our addition.

**13. Protecting Green Belt land**

**133. The Government attaches great importance to Green Belts. 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.**

President  
Her Majesty's Lord-Lieutenant of  
Staffordshire Mr Ian Dudson, CBE KStJ

Chairman  
Mrs Mary Booth, BA MSc

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### **Proposals affecting the Green Belt**

**143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.**

**144. 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 resulting from the proposal, is clearly outweighed by other considerations.****

**145. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.**

Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

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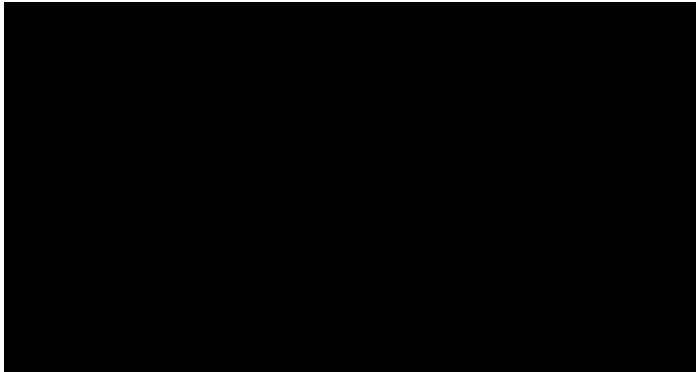
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2. In our view the whole justification for the proposal has been hung on the inclusion of a rail/road freight transfer facility comprising less than 5% of the site area - but with no possibility of over 95% of the buildings (measured by ground area or volume) having direct access to rail facilities other than by road transfer to a secure facility.

We do not consider that the proposal provides adequate 'very special circumstances' and should be seen for just what it is; a massive warehouse development of 297 hectares, with buildings of up to 30 metres in height. The development will have a massive impact on the character and openness of the Green Belt and will clearly conflict with the purposes of including land within the Green Belt for development.



Chairman

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