

1. The proposal includes warehousing that is irrelevant to the functioning of the SRFI.

There are two distinct distribution problems that need to be separated. The first of these is the distribution of large volumes of goods between one manufacturer and one customer. These goods often travel long distances and are suitable for containerisation. The second is the distribution of individual goods between many manufacturers and many customers driven by the rise of e-commerce. These goods may be containerised on their journey from the manufacturer to a national distribution centre (NDC), but will not be containerised on their onward distribution within the UK.

We would all agree with the DfT's desire to reduce CO₂ emissions by reducing road traffic, but a SRFI handles containerised goods for local distribution, it cannot handle individual, non containerised, goods for national distribution. A network of SRFI's therefore only goes some way to achieve the DfT's desired goal with regard to the 'first distribution' problem and does nothing to reduce CO₂ generated by the 'second distribution' problem.

The consequence, for the WMI proposal for a SRFI at Four Ashes, is that it should only deal with goods for local and regional distribution and have no role as a NDC. The WMI Market Assessment notes that "RDC's (regional distribution centres) are likely to be in the range 32,480 sq. m - 46,400 sq. m"¹. Comparing these figures with the sizes of the proposed warehouses listed in the Planning Statement² it can be seen that only 5 of those proposed warehouse units are suitable for RDC's, the remaining 9 are too large and are suitable only for NDC's, a function that the Four Ashes SRFI should not be undertaking.

The WMI proposal clearly aspires to the construction of a national distribution hub, not merely a SRFI with regional distribution facilities, claiming to have access to "88% of UK population within 4.5 HGV hours"³. One of their aims is to "make a major contribution to enabling the area to achieve its inherent potential as a natural centre for distribution"⁴, by which they mean national distribution because the Four Ashes site is *inherently* at the geographical centre of the UK. The Planning Statement makes it clear that "there is a critical shortage of land for distribution uses in this location and WMI would make a vital contribution to the supply of sites currently available"⁵.

The Planning Statement quotes from the DfT NPS "the need for SRFI's to be near to the markets they serve"⁶. The Proposers appear to believe that by having their customers occupy the warehouses to be built on the Four Ashes site they are meeting this condition because the goods only have to travel a matter of a few hundred metres from the SRFI to their customers. This is a misunderstanding of the term 'markets'. By 'markets' the DfT's NPS means 'end users'; the people who need to use the goods, not the logistics company that will distribute the goods.

¹ APP-257 Market Assessment document 7.4 paragraph 4.4.2

² APP-252 Planning Statement document 7.1A paragraph 3.6.16 Fig 11

³ APP-252 paragraph 16.2.10. Fig 33

⁴ APP-252 paragraph 6.5.3 bullet point 6

⁵ APP-252 paragraph 16.2.5

⁶ APP-252 paragraph 3.6.32 bullet point 7

If the distribution companies who occupy the new warehouses subsequently distribute those goods widely, even nationally, then this defeats the object of the SRFI. Goods from the SRFI should only need to travel half the distance to the next SRFI in the network, a maximum of around 50 Km in the case of the Four Ashes site, but there is no difference in HGV journeys, or HGV kilometres and hence co2 emissions, if either these goods are immediately taken from the SRFI to an adjacent warehouse and subsequently 50 Km to the end user, or are immediately taken say 30 Km to a warehouse and subsequently another 20 Km to the end user. The warehouse units used by logistics companies to distribute goods regionally from the SRFI do not need to be adjacent to the SRFI, but can be up 30 Km away without harming the efficiency of distribution.

There is undoubtedly a growing demand for large warehouse units capable of national distribution that is being driven by the growth of e-commerce. It is to be expected that there will be proposals for developments to meet this demand, and WMI clearly intend the Four Ashes site to be a part of the solution to this demand. However, this is the 'second distribution problem', the one that a SRFI cannot help to solve. A planning application for NDC warehousing alone on this site would not be approved by the local planning authorities. The only way to obtain approval for such warehousing is to bypass these authorities, and this has been achieved by associating the warehousing with a SRFI and thereby classifying the project as a NSIP.

This proposal for a SRFI has associated warehousing that is unsuitable for the proper functioning of a SRFI. For planning purposes might I suggest that the Proposal be split into two separate parts:

1. Consideration of the merits of the SRFI,
2. Consideration of the merits of the warehousing.

and each part considered separately.

By considering the Proposal in this way a 'SRFI only' development of 40 Ha might be more appropriate. While some warehousing is required for the efficient functioning of a SRFI the majority of the proposed warehousing is not, and efficiency of distribution, in terms of reducing HGV hours, Km and co2 emissions would not suffer if that warehousing were elsewhere.

2. Loss of Green Belt.

The Proposal recognises that, where there are proposals in the Green Belt the DfT require that "very special circumstances will need to be demonstrated to justify inappropriate development"⁷.

For this Proposal these Very Special Circumstances are summarised⁸ and from this list: the need for an SRFI in the area: the need for warehousing in the area: the economic benefit to the area: the generation of new jobs: and the fact that the proposed site is only 1% of the Green Belt area, are not Very Special Circumstances because Green Belt will always be vulnerable to development under these circumstances. Any Green Belt development will always create new employment, for example, and so this can never be a

⁷ APP-252 paragraph 6.5.3

⁸ APP-252 paragraph 6.5.3

Very Special Circumstance. However there is one of these circumstances that is, in my view, special enough to justify the use of Green Belt land: the lack of an alternative site.

The Alternative Site Assessment report looked for possible sites within the West Midlands/ Black Country conurbation. Fig 11⁹ shows the conurbation with a 60Ha square marked to the same scale and it is obvious that finding a site large enough for an SRFI within that conurbation is problematic. It may well be that there is nowhere else to place a SRFI other than the Four Ashes site.

However, having accepted this, the following have to be taken into consideration:

1. The physical size of a SRFI must be the sole reason for its development on Green Belt land. The reason must not be the high cost of acquiring a Brown Field site, or the high cost of both developing that site and construction of the infrastructure to access that site. A developer will always find a Green Belt site to be the cheapest option because of lower land prices and ease of new infrastructure construction. Lack of an alternative site must not be the lack of an 'economically viable' alternative site.
2. The development must be the minimum size possible, 40Ha preferably but a maximum of 60Ha
3. Only essential warehousing to be allowed as part of the development
4. It must be made clear that the construction of this SRFI in Green Belt is a Very Special Circumstance; consent must be accompanied by a statement to the effect that it will not be allowed to be used by developers as leverage for permitting any additional construction within the Green Belt.

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⁹ APP-255 Alternative Site Assessment document 7.2 paragraph 7.5.2 Fig 11

