

Post Hearing Submissions by
StoptheWestmidlandsinterchange Group.

Application by Four Ashes Limited for the
West Midlands Interchange
Strategic Rail Freight Interchange.

Issue Specific Hearing on 28th February 2019

Overall Statement Document 7.7C DCO

The group have found this a difficult document to comment on, as there are Schedules missing namely 9 and 10. They are listed in the document contents and therefore it would have been useful to have the information included.

Although we understand that this is not a Planning Inspectorate issue, the fully revised document 7.7C DCO has not been uploaded to the PI website and in any case, documents have been extremely difficult to find as some are listed as “other documents” which has made it very difficult to keep up with any changes.

We have some recommendations for site visit destinations which we can supply with the written reports or preferably after the next issue of the DCO as the Inspector directs.

Our basic stance is that we oppose this development on the grounds that there is no justification for the unprecedented release within the green belt for this proposed interchange when there are many suitable alternative locations which do not involve loss of green belt land. Nevertheless on a without prejudice basis we comment on the DCO Schedule and S106 issues without conceding that principle.

Document 7.7C Draft DCO Schedule 1 –
Requirements
Rail Infrastructure.

We consider that there is a significant risk that warehousing will be constructed without securing the necessary rail connections and that the draft S106 Agreement permits this without adequate safeguards preventing this possibility.

1.2 To complete the Rail Terminal Works prior to the earliest of:

1.2.1 The occupation of more than 187,000 sq.m of Warehousing or

1.2.2 - Completion of Rail terminal Works. The group are concerned about the length of time allowed for development of the rail terminal works - 8 year anniversary of the first occupation of more than 47,000 sq.m of warehousing.

In any case the time allowance should be vastly reduced from 8 years or it should be insisted upon that the rail terminal preparatory work begins at the same time as proceeding with the first phase of the development.

1.3 and If completion of the rail terminal works is delayed - can be completed as soon as reasonably practicable. If the work is never completed, then the result is a warehouse industrial estate, which was not planned.

3. Green Infrastructure

3.2 To procure that the Green Infrastructure is maintained by the Estate Management Company.

The group would like to seek assurances that the community parks are secured as long term schemes and that no rights will be reserved to develop them further and that they will be maintained to a high standard and not be allowed to fall into a state of disrepair.

As this development affects openness, the group would also like to seek assurances that the remainder of the undeveloped land will remain greenbelt.

4. Community Liaison Group

4.1 Establish the Community Liaison Group.

That selection of the group members will be fair and inclusive in order to ensure that it represents the community that will be most affected and to ensure that any community fund is procured in those areas that will be most affected by the development

An example of poor procurement can be given: When the Veolia Incinerator was planned/constructed, money was given to

Brewood and used to establish a bowling green. Brewood were not as affected as those in Four Ashes.

Instead the group would request, for example, that a social club/gymnasium be incorporated onto the site for public use.

5. Community Fund (Schedule 6)

5.1 Please see our comments above. How will this be defined? That District Council liaise closely with the Community Group to establish and decide who will benefit from this monies.

Noise Insulation Scheme.

Schedule 7

4. Initial Measurement

The group feel that a re-measurement of Baseline Conditions should be undertaken by the applicant. Pre existing survey of baseline conditions should not be relied upon.

5. Construction Impact.

What will the process be to identify which properties will be eligible. Is the 300 metre

boundary fair? We consider that this needs to be increased. Will other unknown variables that may arise, be considered if they fall outside of the “qualifying criteria?”

5.8 (c) The 28 day deadline is unfair and the group wish a 6 month window to be considered and for the reason below.

5.9 and will allowances be made for those residents who spend time away from their properties in terms of the 28 day time period allowed for response, assessing and claiming the Noise Insulation Payment.

Operational Impact

7. What will the process be to identify which properties will be eligible. Is the 300 metre boundary fair? We consider that this needs to be increased. Will other unknown variables that may arise, be considered if they fall outside of the “qualifying criteria?”

The 28 day deadline is unfair and the group wish a 6 month window to be considered and for the reason below.

7.7 and will allowances be made for those residents who spend time away from their properties in terms of the 28 day time period allowed for response, assessing and claiming the Noise Insulation Payment.

Other types of pollution that should be considered in this revised version is the impact of light pollution and mitigation measures for no light spread, air pollution and mitigation measures for those for the “eligible properties.”

That if consent were granted that the area be designated an Air Quality Management Zone (AQMA) with recording instrumentation adjacent to Gailey Island or other approved area, including monitoring down to PM2.5 size and that the nuisance package for dwellings would include filtered mechanical ventilation as well as sound insulating double windows.

That proposed light pollution / spillage is plotted and adequately controlled if consent were granted.

That the emf levels in the proposed Four Ashes community park would be measured and monitored as the park would be created where transition from underground to pylon high voltage cables is proposed - proximity to which would be unacceptable to commercial tenants.

That sterilisation of strategic minerals is considered before any consent is given.

That investigation is made into the materials already used for partial backfilling of the quarry and why the required programme of re-instatement has been put on hold.

That investigations be made into chemical contamination of the south-eastern corner of the site and Bericote and whether there is an effect on the water catchment area.

Expert Determination

8.1

Who is responsible for appointing the expert (such person to be agreed by the differing parties in circumstances of dispute) given that the public's knowledge of such expertise will be limited?

Schedule 8. Rail Terminal Preparatory Works

b. Additional ground investigations for terminal area to complete the application for the variation of the environmental permit relating to the groundwater remediation. From the remediation document, there is no plan to do a human health impact assessment after construction has taken place. The group would request that this decision is reconsidered and that a health assessment should be carried out following construction.

Schedule 9

Site Wide Travel Plan.

How the travel plan will avoid traffic congestion to and from the proposal

- using the A5 to the east of the M6
- using Gailey Island the A5 to the west
- using Gailey Island and the A449 to the north of it.

Schedule 10

Site Wide HGV Management Plan.

How the HGV travel plan will avoid traffic congestion to and from the proposal

Using J12 exits of the M6 onto the A5

Using Gailey Island the A5 to the west

Using Gailey Island and the A449 to the north of it.

This development will generate substantial levels of HGV traffic. What other routing agreements/advisory freight routes will be put in place?

Stop the West Midlands Interchange Community Group

Introduction

Stop The West Midlands Interchange Community Group (“the Group”) was set up to represent the views of local residents. The Group comprises of professional experts and local residents. It also has local political support from Gavin Williamson (South Staffordshire MP) and Jeremy Lefroy (Stafford MP).

The Group currently has over 2500 supporters from the neighbouring communities that would be directly or indirectly affected by the proposed development, these include the communities of Gailey, Four Ashes, Calf Heath, Hatherton, Penkridge, Brewood & Coven.

The Group do not propose to repeat the objections made by the professional bodies, local authorities and political leaders, the Group are merely seeking to offer a fair, open and honest local perspective and provide their own views on this proposal, which is supported by evidence and professional experts.

The Group would appreciate the opportunity to be involved in written and oral representations during the examination process and to be included in any site visits. They would also ask to be involved in any sessions to consider, the pollution of the site and its remediation, the S106 Agreement and Conditions and to have an opportunity of making Closing Submissions once all the evidence has been presented by all parties.

Written submissions have been prepared on:

Strategic Rail Freight Interchange

- 1) Planning & greenbelt
- 2) Rail.
- 3) Highways.
- 4) Health / Air pollution.
- 5) Environment & ecological issues.
- 6) Tourism/recreational issues.
- 7) Agriculture.
- 8) Location.

The Group ask that their respective witnesses be allowed to present this evidence and to answer any questions arising from the same.