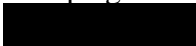


From: [Philippa Edmunds](#)
To: WMInterchange@pins.gsi.gov.uk
Subject: Freight on Rail letter of support for West Midlands interchange
Date: 28 March 2019 16:30:23
Attachments: [Four Ashes supplementary details.docx](#)
[Freight on Rail letter to Planning Inspectorate re Four Ashes SRFI proposal.docx](#)

Please find attached our letter of support for the WM (Four Ashes) interchange and the supplementary briefing paper.

Regards
Philippa Edmunds
Freight on Rail Manager
Campaign for Better Transport


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Planning Inspector

West Midlands Interchange (Four Ashes rail freight interchange) public inquiry

20th March 2019

Dear Inspector

Freight on Rail fully supports the Four Ashes proposal which is predicated on the economic, social and environmental benefits of removing HGVs from our Strategic Road Network in line with Government policy

Increasing rail freight volumes is part of the Government's strategy to reduce CO2 and air pollution emissions, road congestion and road collisions. In order to increase rail freight, interchanges such as Four Ashes, are needed at strategic locations with good road and rail connections, across the UK.

Rail freight helps reduce road congestion which adversely affected productivity. For example, an average freight train using Four Ashes could remove 77 HGVs from the Strategic road network.

Inrix estimated that road congestion costs the UK £30 billion in 2016 with the UK ranked the fourth most congested developed country in the world and third most congested in Europe. Building more roads alone will not solve the problems as it creates new traffic, because when a new road is built, new traffic will divert onto it, a well-known and long-established effect 'induced traffic'. The FTA stated that it costs around £1 a minute to run a 44 tonne truck so any hold-ups have a considerable financial impact on operations; transferring more freight to rail, helps make road operations more reliable.

Job creation and re-generation benefits of terminals

Four Ashes will generate around 8,500 jobs with £10m business rates to the local authority. Furthermore, this investment will give the wider rail freight industry confidence to follow suit.

Scarcity of suitable sites which justifies use of green belt in very special circumstances for Four Ashes

The justification for using greenbelt land, in very special circumstances, is based on the scarcity of suitable sites for SRFIs which need to be near conurbations and have large flat sites in line with **Government spatial policy**:-

The Planning Act 2008 ('the Act') sets out the planning process for Developments which are classified as Nationally Significant Infrastructure Projects including SRFIs.

In the case of SRFIs, the 'National Networks National Policy Statement' (the NPS) , published in December 2014, sets out the need for (and Government's policies to deliver) Nationally Significant Infrastructure Projects on the national road and rail networks in England, including SRFIs. The NPS policy states that there is a compelling need for SRFIs, and due to the fact that there are very limited sites suitable for SRFIs, the use of the green belt can be justified in special circumstances.

Mitigation measures

Four Ashes is located adjacent to the Strategic Road Network which minimises the impact of the extra HGV movements on the local road network; it is intersected by the strategic Rail Freight Network. The terminal and warehousing have been designed in a way to limit the adverse impacts such as noise, dust, air & light pollution on neighbours. Moreover, the following additional mitigation measures have been made as a result of the stage 2 statutory and stage 2a focused consultation.



Freight on Rail is a partnership of many organisations promoting the economic, safety and environmental benefits of rail freight.

- Additional land has been brought into the scheme to improve the connectivity of Calf Heath Community Park;
- A small parcel of additional land has been brought into the scheme to the north of the A5 to allow for works to be carried out on electrical infrastructure;
- A 100m wide dark 'ecological corridor' was introduced for bats and other wildlife, running from the Reservoir to Calf Heath Wood;
- The amount of green space across the site was further increased from 33% to 36%;
- The layout of the roundabout to the north of the Bericote Site, the height of the elevated section of the link road and the access to the Four Ashes Industrial Estate have all been amended to improve accessibility; and
- Minor amendments have been made to the red line to avoid small parcels of unnecessary land and part of the Canal.

Freight on Rail believes the Four Ashes proposal meets all the criteria set out in the planning system; we have also written detailed notes expanding on the points made in our letter.

Yours sincerely,



Philippa Edmunds
Freight on Rail Manager
Attached briefing notes
Please reply to Philippa.Edmunds@bettertransport.org.uk



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Detailed notes on the economic, safety and environmental benefits of rail freight with regard to the application for the West Midlands interchange (Four Ashes)

Rail freight is worth £1,7 billion per year to the UK economy; importantly, these benefits are realized across the country with the North West of England, Yorkshire and the Humber and the Midlands as the highest beneficiaries at a time when the Government is trying to re-balance the economy away from the South-East and London.

Why strategic rail freight interchanges needed to increase rail freight volumes

Economies of scales reduce the transshipment costs between the modes. SRFIs enable rail to compete with HGVs as it reduces the transshipment costs between the two modes by providing value added services such as rail served warehousing and ancillary service buildings. In particular, off road vehicles can be used around the site rather than registered and more expensive HGVs.

Four Ashes will generate around 8,500 jobs with £10m business rates to the local authority. Typical job mix is 35% administrative/manual, 50% skilled semi-skilled and 15% managerial/technical. The British Property Federation report stated that the UK logistics sector had the following impacts GVA per employee £58,000. GVA per employee forecast to be £75,000 by 2035 which is twice that in banking and finance.

Detailed analysis from W. H. Malcolm Ltd, which run the SRFI at Daventry in Northamptonshire and Campaign for Better Transport, shows that the SRFI removes far more lorry miles than previously thought. In 2017, rail services from DIRFT in fact remove 64 million lorry miles mainly off the congested strategic road network.

<http://www.freightonrail.org.uk/PressRelease22-05-2017-rail-freight-better-at-reducing-congestion.htm>

Figures on HGV involvement rates in critical incidents on the SRN make the economic and safety case for rail freight

For example the average monthly figures for critical incidents on the Strategic Road Network Jan-Nov last year show the following:

Incidents of more than 5 hours HGV involvement rate is 42.8 per cent of incidents of more than 10 hours is 55.72 per cent even though HGVs make up just under 12 per cent of motorway traffic miles in 2017.

Rail freight also reduces road infrastructure costs

Large HGVs are up to 100,000 times more damaging to road surfaces than a Ford Focus – 4th power law Therefore some of the heaviest road repair costs are therefore almost exclusively attributable to the heaviest vehicles. Rail freight therefore reduces the road infrastructure costs for local, devolved and central Government

Environmental benefits of rail freight

There is a significant opportunity to reduce transport emissions by shifting freight from road vehicles to rail. In total, road freight (Heavy Goods Vehicles and light vans) was responsible for one third of total greenhouse gas emissions from transport in 2015. Source EIS (2017) 'Final UK greenhouse gas emissions national statistics: 1990-2015

By contrast, the total greenhouse gas emissions from rail (including both freight and passengers combined) are an order of magnitude lower at less than 2% of total UK transport emissions.



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As rail freight produces 76% less CO2 emissions than the equivalent HGV journey, increasing rail freight is an important part of the DfT's policy to reduce freight's emissions and help the UK meet its legally binding Climate Change targets. *Source DfT Rail Freight Strategy September 2016*

HGVs contribute 17 per cent of surface access CO2 emissions, despite making up only 5 per cent of road vehicles whereas both passenger and freight rail together are less than 2 per cent. *Source DfT Rail Freight Strategy September 2016*

Energy efficiency is directly related to carbon dioxide emissions, rail is significantly more energy efficient than other modes with the exception of shipping. A tonne of goods can travel 246 miles by rail as opposed to 88 miles by road on a gallon of fuel

Source Network Rail Value of Freight July 2010.

Air quality benefits of rail freight

Rail freight can be part of the solution to reduce air pollution. Rail produces 90 per cent less PM10 particulates and up to 15 times less nitrogen dioxide emissions than HGVs for the equivalent journey.

HGVs account for around 21% of road transport NOx emissions while making up just 5% of vehicle miles – DfT Freight Carbon Review February 2017.

Safety benefits of rail freight

The latest DfT valuation of the benefits of prevention of road accidents puts the costs per fatality at over £1m Planning Inspector

HGVs were almost five times more likely than cars to be involved in fatal accidents on minor roads in 2017.

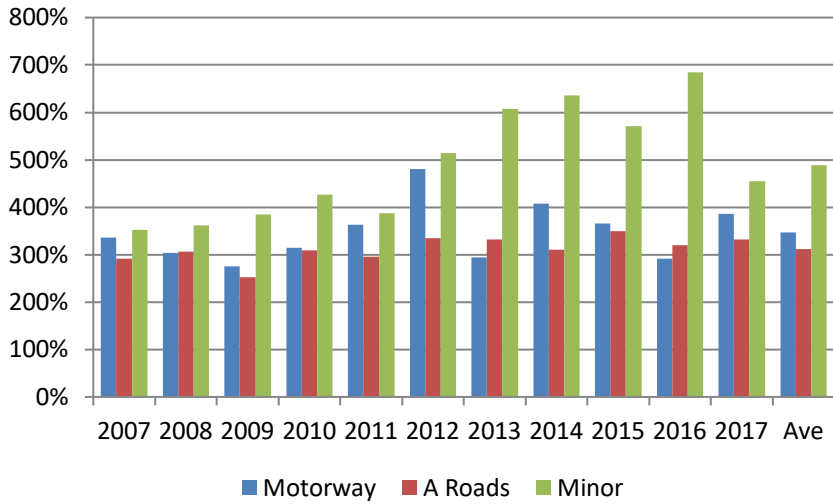
Source: Traffic statistics table [TRA0104](#), Accident statistics Table [RAS 30017](#), both DfT

This graph shows HGV involvement rate in fatal crashes on different road types over the past 11 years.



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**Involvement in fatalities
HGVs over 3.5tonnes compared to all traffic**



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