

**Brewood and Coven Parish Council**  
**with Bishop's Wood and Coven Heath**

**Ref: WMI-SP011**

**TR050005 West Midlands Interchange Feedback to Planning Inspectorate 3<sup>rd</sup> April 2019.**

At its meeting held on 27<sup>th</sup> July 2017, Brewood and Coven Parish Council resolved to further object to the above proposed development for the following reasons:

- *The development would result in further urbanisation and industrialisation of South Staffordshire.*
- *The development would be inappropriate in the Green Belt with no special circumstances demonstrated.*
- *Alternative sites are available and would be more appropriate, i.e. Stoke-on-Trent or Bescott Yard, where road links and infrastructure is more suitable and unemployment is higher.*

**At a further meeting held on 26<sup>th</sup> March 2019 the Parish Council agreed to submit further comments in relation to its objection to the West Midlands Interchange.**

**Headings have been ranked by order of importance.**

**Green Belt Considerations**

*With regard to the National Policy Framework, very special circumstances have not been demonstrated in our opinion. We are concerned about the impact on our residents and on our Green Belt.*

The M54 forms a barrier between industrial West Midlands/Black Country and rural Staffordshire. The Green Belt is already being eroded by the acceptance of South Staffordshire Council to develop the i54 Corridor and Shropshire County Council's Local Plan to develop a strategic site along the A41 at Cosford. Once the barrier is breached, the result will be the irreversible loss of Green Belt and the industrialisation of Staffordshire.

**Site Suitability**

*With regard to the suitability of the Four Ashes site for a strategic rail freight interchange, this Parish Council does not believe that an alternative site assessment has been comprehensively investigated.*

Why haven't sites which are Brown Field sites within the West Midlands, where there is existing infrastructure already in existence, been considered? The strategic case for the need for an interchange at the Gailey site has yet to be made.

Within a 13 mile radius Bescott Yard, Walsall, has been identified as a suitable site by the West Midlands Combined Authority (Birmingham City Council, Coventry City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, Walsall Metropolitan Borough Council, and City of Wolverhampton Council). This site is closer to the West Midlands (Black Country) and the case has already been made by the Combined Authority for its successful delivery of the project.

Within a 12 mile radius, at Donnington, Telford there has been less than one freight train per week (50 in the first year of operation) visiting the site and as a result, there has been a call to turn the land over for lorry parking in an attempt to generate income. There has been little commitment from local businesses

to use the rail terminal. This demonstrated that there is no need for an additional freight interchange at Gailey and no need for the magnitude of warehousing which has been proposed.

There is concern that the rail link at Gailey will not be delivered and the area will be left with a massive storage site which would be grossly underutilised.

### **Transport Networks**

*The information given is subjective and is not supported by up to date figures.*

An independent traffic survey would prove that the roads surrounding Gailey are already over capacity. Other sites already built, for example in South Yorkshire, are currently served by a dual carriageway and an airport; there are no such facilities at Gailey.

Highways England has stated that there is no scope for increasing the capacity of feeder roads giving access onto the M6. Other sites have greater capacity for access onto a motorway without contributing to local congestion. Currently, if there is an accident on the M6 at or near Junctions 10 to 13 the major road network in our area is brought to a standstill.

Part of the justification for HS2 was that the West Coast Line was at full capacity. The M6 Toll was constructed to relieve congestion on the M6 which continues to be over capacity, with the Toll underutilised even at peak times. There is no scope on the M6 for any additional traffic resulting from the West Midlands Interchange.

When the M54/M6 link is constructed, the A449 will be downgraded from a trunk road. Part of the justification of WMI is that it would be next to a trunk road, which will no longer exist.

### **Air Quality and Carbon Emissions**

*The effects of the proposed West Midlands Interchange on air quality and carbon emissions have not been fully investigated and we are concerned about the impact on our residents.*

There will be 18,624 extra vehicles every day including 6,319 HGVs, putting 16.3 extra tons of CO<sub>2</sub> emissions directly into the air.

- The EU has agreed on a goal to cut CO<sub>2</sub> emissions from cars by 37.5% and from vans by 31% by 2030, compared with 2021 predicted levels.
- UK emissions targets are: a reduction of at least 80% by 2050, compared with the 1990 levels (Climate Change Act 2008).
- Emissions of greenhouse gases (GHGs): carbon dioxide, nitrous oxide, particulate matter can enter the food chain and cause acid rain.

### **Noise**

*The information given is subjective.*

Noise pollution would inevitably increase especially at night, the extent of which and the impact on residents cannot be assessed. Vibrations from vehicles will impact on building foundations, some of which are Listed.

### **Socio-Economic**

*In relation to employment impacts of the development, the reasoning outlined in the documentation has not been adequately demonstrated. The information given does not correlate with the South Staffordshire Locality Profile 2017.*

There will be no benefit to this area of already low unemployment. The construction of the site will have a significant detrimental effect on the rural environment, increasing the size of local settlements and villages which must be preserved at all cost. The Parish Council appreciates the need for additional employment opportunities in some parts of the Black Country and West Midlands and would strongly argue that the facility be built close to these areas; Stoke on Trent or Bescott Yard for example.

### **Landscape and Visual Impact**

*The effects of the proposed West Midlands Interchange on the landscape and the visual impact it may have has not been fully investigated and we are concerned about the impact on our residents.*

It has been estimated that there will be 30m high ugly warehousing units spread over 643 acres of Green Belt land resulting in loss of openness. The site will be visible from high ground as far away as Stafford and from Cannock Chase, an Area of Outstanding Natural Beauty designated for conservation due to its significant landscape value. No amount of screening will prevent it being seen from miles around. There will be a 100% increase in light pollution at night.

### **Cultural Heritage**

*The effects of the proposed West Midlands Interchange on the cultural heritage (above ground) have not been fully explored and we are concerned about the impact on our residents.*

Within two miles of the proposed site at Stretton there is evidence of a junction of two major Roman roads, one to Chester and the other to Holyhead. There is also a Roman villa near to Gailey island on the A5 and Pennocrutium at Stretton Mill, Water Eaton. In addition there is an agger and stone Roman road from Stretton to Featherstone (Monument No 1029299 documented by Historic England).

### **Ecology and Nature Conservation**

*The effects of the proposed West Midlands Interchange on ecology and nature conservation have not been fully explored and we are concerned about the impact on our residents.*

Loss of the Green Belt will have a massive impact on ecology including the destruction of ancient woodland and hedges.

29<sup>th</sup> March 2019.