

Mr C. Clark Expansive Comment on my Written Representations (1,380 words)

Further to my earlier representations the following is additional expansive comment detailing my objections.

Please note: My use of the term Proposers implicitly means all those in whatever capacity who are involved with promoting WMI.

The location and the reasons given for the proposal are inconsistent and contradictory.

The proposers of WMI when identifying the preferred site rejected several other locations. In particular Dunston (approximately 5 miles or 8 km north of the preferred site), an area remarkably similar to the preferred area. In rejecting Dunston, the proposers used the following form of words in their reasoning:

"[...] the main issue which is that the site is an open and rural location [...] and a development of the size and scale of an SRFI would be very difficult to successfully assimilate or mitigate in landscape and visual terms. The resultant effects on the landscape character of the site and its visual impacts would be much greater [than at the preferred site] due to Dunston's existing openness and rural character and the absence of screening as well as the absence of existing industry or urban influences from its setting." (Extracted from the proposers' Stage 2 Consultation Overview Document, paragraph 6.1.8)

This same narrative argument equally applies to the preferred site situated within the parish boundaries of Four Ashes, Calf Heath and Gailey. However, whereas only one village would have been directly and adversely affected at Dunston, three would be directly and adversely affected should the preferred site be permitted.

It cannot be overstated that the undeveloped preferred site area forms no part of the existing Four Ashes industrial site and has no current or previous industrial use. The proposers have acknowledged verbally that the quarrying of sand and gravel taking place in one smaller area of the site does not constitute a 'foot-in-the-door' argument in favour of industrial development; this agrees with Government Planning Guidance accepted for such similar situations.

Due consideration of the location being within designated Green Belt has not been taken into account.

The proposers' Stage 2 Consultation Overview Document, Section 9 wholly details the extent of destruction the WMI would wreak upon the Green Belt if it were permitted. There are sixty paragraphs within this section, each revealing the numerous detrimental and adverse effects the development would directly and indirectly cause in the opinion of the proposers. However, whilst acknowledging the deleterious effects upon the preferred site's current Green Belt status, the proposers show no contrition or regret on this matter and have successfully conveyed the impression they see the Green Belt as a broad obstacle to be overcome in their bid to turn relatively inexpensive but useful agricultural farmland into commercially lucrative development land. This appears to be their principal aim in this venture.

Due consideration of the proposal's impact on the environment has not been taken into account.

The proposers have offered what they describe as 'mitigation' measures against the loss of rurality but see no irony in that such measures would be paltry and wholly ineffective in replacing what would be lost in the development process.

As far as can be ascertained in the proposers absence of precise facts and figures, they believe that the planting of some trees and creating some earth mounds would be sufficient to offset the damage from industrialisation of approximately 2.3 km² (735 acres) of open farmland and concomitant pollution created by: the development's visible intrusion, construction and operational noise, construction and operational air contamination from exhaust fume and dust, artificial light pollution, water-borne pollution from contaminated run-off, litter.

Due consideration of the proposal's impact on the immediate and wider residential population has not been taken into account.

The proposers response to the immediate area's residents' fears and concerns (those living within one mile of any part of the preferred site's boundary) has not allayed any such fears and concerns. The proposers have generated considerable resentment from the nearby affected residents by their barely concealed view that the residents are another obstruction in their pursuit of this development venture. It is patently obvious that the meagre mitigation measures proposed would not protect these residents from the full deleterious effects of the development during construction and when the site became operational.

A huge predicted and unavoidable adverse impact would inarguably result from the massive increase in road traffic within the immediate area and considerably farther afield. The trunk roads A5, A449 and A460 are already typically at capacity, and even overload during peak hours, as are the M6 and M54 motorways. There is nothing within the WMI proposal that would promise anything other than a further increase in traffic on these arterial roads. Furthermore, because main road congestion would be considerably worsened, both commercial and private road vehicle users would increasingly 'short-cut' or 'rat-run' by using the network of narrow interconnecting village lanes. This would lead to an intolerable situation of reduced road safety, damaged infrastructure and environment, and increased travel-to/from-work times for a much wider area's population.

At a time when there are well-founded concerns about the peril to human health and the environment from diesel engine exhaust fume, creating a development that would actually increase such damaging pollution exponentially over a wide area would be at best short-sighted and at worst criminally negligent. Although exhaust pollution is certainly a priority for reduction, the other environmentally-damaging pollutants of: noise, artificial light, loss of visual amenity, airborne dust, litter and waterborne run-off contaminants, would all increase at a time when measures to bring about decreases should be being implemented. Such pollution cannot be contained within the development area by any mitigation measures; it would be beyond the control of the proposers and would be inflicted upon the population.

The data projections for employment created, reductions in road haulage, benefits to the local and national economy are misleading.

The proposers have made much of their projected data or what they expect the WMI would create in terms of employment, reductions in road haulage and benefits to the economy. It can be argued that they expect these predictions to be sufficient sole reason for their obtaining development permission for WMI. But these data are not facts; they are an estimate, prediction or even a guess based on a number of assumptions and a desire to present an optimistic case in favour of their proposed WMI.

A main plank in their rehearsed argument is that a Strategic Rail Freight Interchange (SRFI) in this location is not only desirable but very necessary. However, despite this stance, the proposers refuse to enter into legally binding agreements concerning mandatory use of the rail freight facility by the business-occupants of the site. Without any such legal obligation, the site effectively would not be an SRFI but

suspiciously an even more unattractive large warehousing facility and HGV park excessively reliant on road freight. When considered in this light the projected reductions in road freight make no sense. Little or no rail freight directly equates to an inevitable huge increase in road freight over and above that expected to be created even if the site worked well as an SRFI.

Large warehouses take a considerable amount of land in terms of situation and infrastructure but do not create employment in these days of automated warehousing operations. They are voluminous 'dead space' in terms of jobs. They rate poorly in terms of land-take to employment ratio.

The principle upon which the reasons for the proposal rests is false.

Accepting that the proposal would:-

- 1) Be destructive of Green Belt and useful agricultural land.
- 2) Have no legal obligation to be used as a SRFI despite its being identified as such.
- 3) Bring about a massive increase in all forms of environmental pollution.
- 4) Increase road traffic on an already overburdened road network.
- 5) Be prejudicial to the local residents' enjoyment of their property.
- 6) Be very likely to fail to meet expectations of land-take to employment ratio.
- 7) Be visibly obtrusive and deleterious within the rural landscape.

Then it must be accepted that the proposal falls far short of its merits as described by the proposers. Without such merits the proposal would fail to fulfil any of its determining criteria and therefore should not be permitted.