

[REDACTED]

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1 April 2019

Dear Sir

### Proposed West Midlands Rail Freight Interchange

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I am writing to express my strong objection to the above development.

My objections relate to **transport, nature conservation and landscape** matters.

#### **Transport**

Having lived in Acton Trussell for 17 years I have been very conscious that the local and regional strategic highways have become far more congested over time. The A449, A5 and M6 motorways are all often impassable due to congestion by slow moving and stationary traffic. Consequently I consider an increasing number of places relatively close to home effectively out of reach because there is no quick way to get to them by car. The M6/ M5 going south is a particular problem for much of the day.

To place a new development approximately 1¼ long by 1¼ miles wide, most of which is designed to generate road traffic, will exacerbate the problem. No road improvements to the surrounding road networks to increase road capacity are proposed. The construction and operation of this proposed development will add considerably to the current difficulties of a local road system that is too congested to operate effectively. Congestion would be additionally exacerbated by road traffic generated by the workforce required to operate this huge development.

I understand that this scheme is designed primarily to serve Birmingham and the Black Country. However, the nearest part of the Black Country (Wolverhampton) is approximately 7 miles away and Birmingham town centre is 17 miles away. These are all miles that would generate additional significant lorry transport on a road network which is already over capacity much of the time. The A449 and the M6 south bound and other local roads will inevitably become even more congested for longer periods. I note from the indicative plans that only a small minority of the plots actually have access to the rail frontage which is very short in comparison to the size of the application site. This is essentially a B8 development, primarily for road transport which will be imposed on an already congested road system. The essential rail component appears very much a secondary feature.

The solution is for a network of smaller brownfield sites with direct access to the rail network within Birmingham and the Black Country itself which would reduce the number of road miles for heavy vehicles by bringing this proposed development close to the areas it primarily serves. There would also be access to a more local workforce requiring fewer and shorter car journeys for site employees.

On functional grounds the current proposal appears very sub-optimal.

#### **Nature conservation**

I note from the ecological baseline study that a number of European Protected Species have been found, including all species of Staffordshire bats (except Lesser horseshoe) as well as great crested-newts and otters. The full impact of the proposed development on each of these species needs to be properly evaluated. If the development would be detrimental to maintaining local populations of some or all of these species then it should not go ahead. Constructing a

development approximately 1½ square miles in area is going to destroy much of their foraging habitat and fragment the remainder. The mitigation measures proposed may reduce the impacts but it will be many years before replacement planting will reach maturity or even semi-maturity. What will local populations of these species do in the years until the diminished and fragmented replacement planting grows? The farmland birds would be lost from the site as no farmland would remain.

Inevitably ecological studies are a brief snapshot in time. I therefore expect continuing survey effort to assemble full information on the ecology of the site to properly assess the impacts of this gigantic proposed development. This is such a large area of land which would be lost to wildlife that the impacts on the ecology of the wider area should be assessed and not just those areas within the site. The conclusion that the impacts would be 'local' is misleading given the huge area of the site.

I accept that the habitat is generally not particularly species diverse. It is however structurally diverse. Woodland, hedges and trees which provide much of the structural diversity will be lost in the medium to long term. The development is crisscrossed by roads which will be a barrier and a hazard to most of the protected species, particularly if street lighting is to be used.

The rendered artistic montages and videos in the exhibition show a bland structureless landscape surrounding the development.

The proposals indicate a proportion of veteran trees would be retained within the layout. (Four out of 11 true veteran trees would be lost). However, veteran trees are very sensitive to changes in their vicinity and, even if they survived, they would be isolated and fragmented features in the landscape. Their value and importance would be reduced. The proposed layout is only indicative and therefore it is possible that, if planning permission is granted, considerably fewer of these trees would be retained as, in my experience, the environmental quality of all developments diminishes once approval has been given for the principal of development.

### **Landscape**

I am also concerned about the two areas set aside as 'Community Parks'. There is surely little demand for such areas in this relatively sparsely populated area of South Staffordshire. Very few people live within walking distance so most users would have to drive. It is not clear who the target audience for these parks would be. The southern 'park' is effectively two sites; land left over after planning. It would also be overshadowed by large warehouses and bisected by a road and not really an attractive destination to visit. If they are poorly used there is always a risk that they would be lost or allocated to other uses or savings made on their management.

This is a speculative development without end users identified. If it receives planning permission and subsequently fails to be viable, in whole or in part, other profitable development uses will eventually be found. It will not be returned to farmland and any laudable environmental objectives set during the early stages of a project would fail to appear but the development would remain.

For the reasons set out in this letter, this development should not be permitted.

Yours faithfully  
Simon Phipps