

Proof of Evidence

On behalf of
Stop The West Midlands Interchange

2. Rail Report

In respect of the proposed West Midlands Interchange



Strategic Rail Freight Interchange

Introduction

This evidence has been prepared by a local community group opposed to the West Midlands Interchange at Gailey, Four Ashes and Calf Heath in South Staffordshire. The community 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).

‘Stop The West Midlands Interchange’ currently has over 2500 members from the neighbouring communities that will be directly or indirectly affected by the proposed development, these include the communities of Gailey, Four Ashes, Calf Heath, Hatherton, Penkridge, Brewood & Coven.

We do not propose to repeat the objections made by the professional bodies, local authorities and political leaders we are merely seeking to offer a local perspective and provide our own views on this proposal, which is supported by evidence and professional experts.

This report focuses on the Rail aspects of the development at this location.

This report should be read in conjunction with the other reports prepared by the group on the following matters:

- Planning and Green Belt;
- Highways;
- Health
- Environment & ecological issues;
- Tourism / recreational issues;
- Agriculture;
- Wrong Location
- Supporting Information; and
- Answers to the Inspector’s Questions

SUMMARY OF OUR OBJECTIONS

We regard the National Planning Policy Statement for National Networks (NNPS NN) December 2014 as a key document for the Examination.

From the NPS, we can deduce that in order to qualify (and indeed prove that it will function as a Strategic RFI the applicant should be required to demonstrate:

- That the use of rail will be optimised.
- That the trip mileage of freight movements on both the national and local road networks will be reduced by the proposal.
- The development is in the wrong location. The railway infrastructure and topography within this proposed location, the Birmingham Loop of the WCML with only two tracks (up and down) is not suitable for additional freight use.
- The development is contrary to the Rail Freight Strategy and will go against recommendations put forward by the Freight Network Study 2017, which places significant emphasis on improving average speeds on lines. The proposal will cause further reduction to line speeds on the Birmingham Loop and no new freight paths have been proposed to support this proposal and facilitate freight use on this line.
- The Rail Freight Hub is reliant on HS2 moving rail services from the WCML. The HS2 Phase 2/2b (construction due 2027 and 2033 respectively) has not got Royal Assent and it is an unknown if or when it will be built.
- From the NPS, in order to qualify and to prove that it will function as a SRFI the applicant should be required to demonstrate that the use of rail will be optimised and that the trip mileage of freight movements on both the national and local road networks will be reduced by the proposal.

If the questions below were applied to this proposal, most would fail.

- Will the use of rail freight be optimised?
- Has rail trunk haul been maximised in comparison to alternative sites?
- What elements of secondary distribution have been minimised?
- Is the proposal likely to reduce the cost to users of moving freight by rail?
- Will trip mileage of freight movements on both the national and local freight networks be reduced by the proposal?

And the reason why most would fail is because it is simply not close enough to the point of sale of the goods to minimise secondary distribution

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RAIL REPORT

This report examines the rail aspects of the WMI proposal.

1.0 Four Ashes Ltd claim that their scheme has “excellent rail links.” By observation that is untrue. It is simply a warehouse scheme / industrial park with a token connection to the railway to justify an SRFI classification.

The existing railway is in a deep cutting, there is no yard or marshalling facilities.

1.1 We object to the scheme for the following reasons: -

- The development is in the wrong location. The railway infrastructure and topography within this proposed location is not suitable for additional freight use.
- The development is contrary to the Rail Freight Strategy
- The Rail Freight Hub is reliant on HS2 moving rail services from the West Coast Mainline. The HS2 Phase 2 / 2b has not got Royal Assent and it is an unknown if or when it will be built. This scheme should not be approved based on 'what ifs' and reliance on a separate major infrastructure scheme coming forward, which may not happen.

The above reasons are addressed below.

2.0 REASON FOR OBJECTION

The development is in the wrong location

2.1 The railway infrastructure in this proposed location is not suitable for additional freight use due to it being located on the Birmingham Loop of the West Coast Mainline, which only has two tracks (up and down).

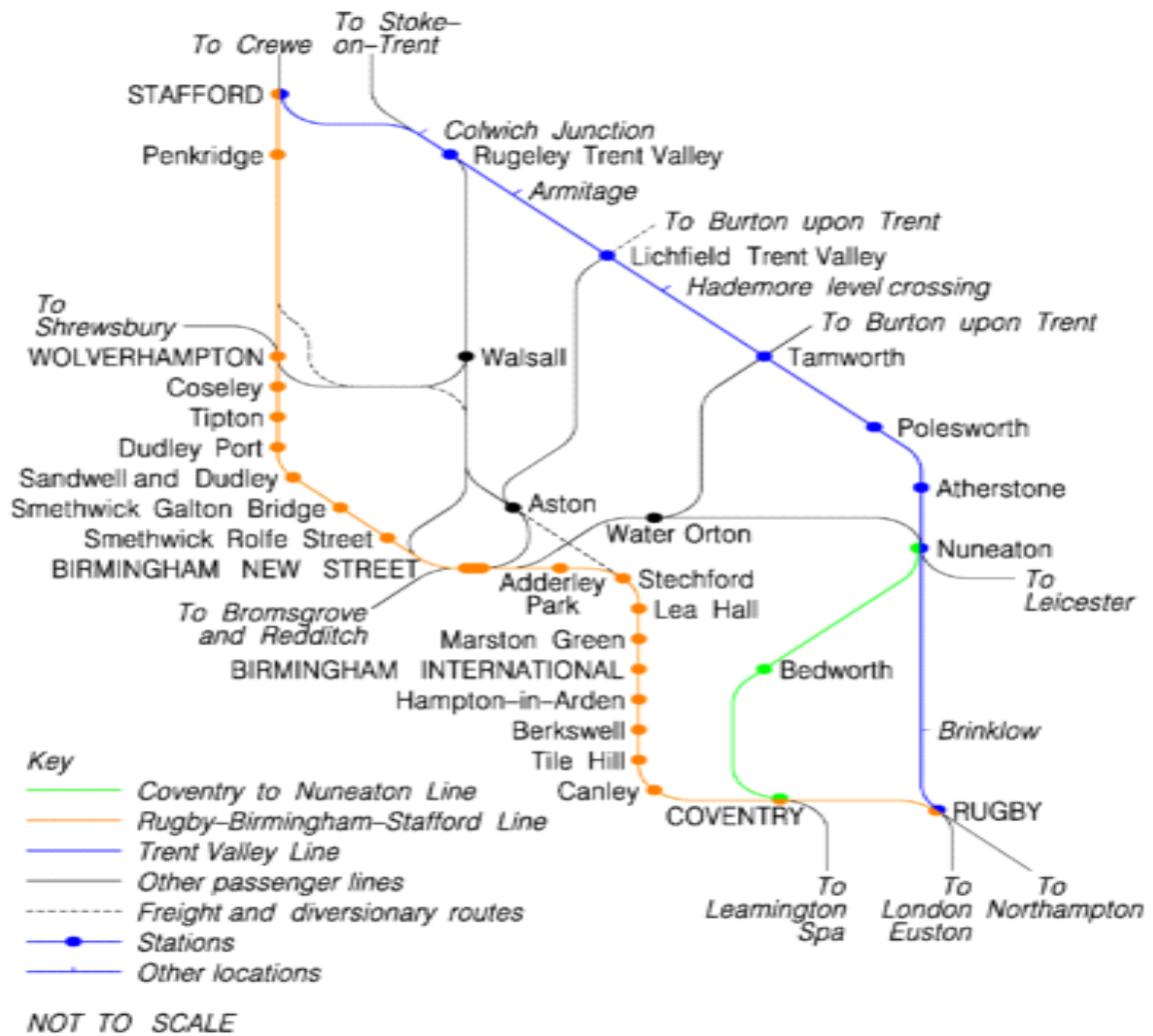
2.2 There is a large difference in level between the road (A5) as the track runs through a cutting for much of the proposal site – restricting the use of sidings and adjacent buildings. There is no connection possible to the remaining dozen warehouses due to levels and a historic canal.

2.3 This development should be built on the direct route of the West Coast Mainline (Trent Valley Line), which is a four track line and allows fast and slow trains to move independently of one another and regular maintenance procedures.

Figure 1 - West Midlands Rail Network

The image below demonstrates that there are a number of other locations on the Main West Coast Mainline (WCML) which are more suitable for a Strategic Rail Freight Terminal and would serve the alleged needs of the freight industry in the Black Country /South Staffordshire region. Furthermore these locations are nearer to major conurbations and are more sustainable.

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2.4 As stated above, the site is located on the Birmingham loop. This line is predominately a two-track section, with several flat crossing points which means that both inter-city and existing freight services are forced to share the same tracks and cross over in front of fast inter city trains from London. This significant speed differential limits the number of trains that can be run on the line and leads to rail capacity issues. By adding freight trains within this location will cause further speed differentials and will add an additional bottleneck in an already congested section.

2.5 Recent major projects undertaken by Network Rail to separate freight and intercity trains most notably in the Stafford Area Improvements Programme has sought to avoid conflicting train movements to enhance local capacity gains, improve network punctuality and reduce journey times.

The proposal is contrary to the improvements made by Network Rail.

2.6 There is a lack of good quality freight paths on the line. There are pressures to run additional services on this line, which is hampered by the lack of good quality freight paths. Good quality day-time freight paths are not present to allow freight trains to enter the route section at Rugby or Nuneaton and run to their exit from the WCML without having to stop since there are no places where freight trains can be held off-line in a loop to permit faster passenger services to 'overtake' which increases the overall journey time, impairing the operational efficiency for operators and delaying end customers.

2.7 The creation of nodal yards can create the capability for freight to operate in paths that are more appropriate and deliver benefits such as improved timetable capacity and network performance. Developed at strategic geographic locations, nodal yards act as freight traffic staging and regulation points at the confluence of adjacent route sections, enabling effective management of freight traffic flows.

2.8 Where possible, nodal yards should be designed so as to potentially incorporate key ancillary services including wagon maintenance, locomotive fuelling and crew relief facilities. The overriding objective of the nodal yard concept is to achieve shorter overall journey times for customers by reducing or eliminating multiple stops on-route.

2.9 Significantly, there are no plans for a nodal yard as part of this proposal and the Network Rail upgrade plan have not proposed any new nodal yards within the West Midlands region.

2.10 The Birmingham Loop of the West Coast Mainline has a lack of capacity because of the outdated track layouts and signalling systems. It also crosses challenging terrain in its northern half and is hemmed-in by roads and buildings at its southern end which prevents additional tracks being added. Attention has

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concentrated on rebuilding track for 125mph services, renewing overhead line equipment and re-signalling for higher speeds.

<https://railway-technology.com/projects/virgin/>

2.11 However, the benefit of these measures is limited as stated within the 'Freight Rail Strategy' document and the 'Rail Use Strategy (RUS)' document, which states that by 2024 the WCML will be at capacity and the only viable option to improve capacity is the provision of a new High Speed line. Whilst there will be a potential to run a small number of additional fast commuter services during the peak and extra LDHS services in the inter-peak, the WCML is then effectively full, particularly at the south end of the route. The lack of capacity will become even more acute beyond 2024 as demand continues to grow.

The WCML is expected to be at capacity and become increasingly constrained in its ability to support the economy (through commuter and business travel) and to generate revenue for the industry. The most effective and best value for money way to create additional capacity will be through building a new High Speed line, aligned with Government Policy and the recommendations of the West Coast Main Line RUS.

3.0 Rail Freight Hub reliance on HS2 moving rail services from the WCML

To facilitate additional freight capacity on the WCML, Four Ashes Ltd are reliant on HS2 encouraging existing services moving over to the new line. There are no guarantees that this will happen.

3.1 HS2 is not a done deal. HS2 phase 2 and phase 2b has not yet received Royal Assent and there is substantial opposition from numerous sectors who have cited that the alleged potential benefits on the existing rail infrastructure to increase capacity as dubious. The report by consultants Oxera warns that there remains “a degree of uncertainty” around the financial and possible rail capacity figures attached to the scheme.

3.2 There are still significant issues, which remain unsolved according to the Freight Rail Authority (FRA), particularly where HS2 runs on existing tracks, and with some of the details in the Phase 2A Bill.

3.3 One such issue is timing, the construction of Phase 2A is not due to commence until 2027 and Phase 2B is not due to start until 2033. This will prevent any freight capacity increase and as reported by the Freight Rail Authority, will cause potential capacity constraints south of Crewe for the period between Phase 2A and Phase 2B opening, if they do indeed open.

3.4 HS2's proposed service pattern after the completion of Phase 2A will increase passenger services to Manchester this will reduce freight paths from the current one or two per hour to only one per hour. No assurances have been provided by the Government that the existing services can continue and that there is capacity for freight growth prior to the future opening of Phase 2B.

3.5 A concern is that the Wolverhampton-Stafford line is 115/125mph route and used by several passenger train franchises (WC XC WMT and TFW) as well as other freight activity. It is a main line with no intermediate stations except Penkridge, which has one train stop per hour in each direction.

3.6 Ref: (Information provided by local rail expert 6th Jan 2019) Adding freight trains to the route, which arrive and depart and shunt, as well as potential light locomotive movements from arriving trains and for departures will severely compromise into the existing line capacity.

3.7 The most exasperating situation is that just five miles away from Four Ashes is the Freightliner (Pentalver) intermodal depot in Cannock. This yard was developed on the site of the former opencast coal loader for filling railway wagons for power stations. The site was demolished and Pentalver developed a containerbase on the site. Pentalver have now been taken over by US giant, Freightliner. The company have applied for and been granted planning consent to operate as a rail freight facility. There is an adjacent industrial park development. Within the last two years Network Rail have renewed the pointwork off the mainline into the facility and resignalled it as part of the modernisation. In addition

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the Cannock line has been electrified and the first electric trains ran trials in 2018.

Fig. Cannock's Kingswood Employment Park with Freightliner RFI at the top left of the picture.



3.8 So there is a new freight container base connected to the electrified Network Rail route, which only has 4 local trains per hour on it. This line was once considered a slow route but in the last two years has seen upgraded infrastructure, indeed towards the end of January 2019 Network Rail are slewing the route just north of Landywood station to raise line speed.

3.9 The Grand Junction line between Stafford and Bushbury is a mix of 115 and 125mpg track and used by at least four passenger TOCs. Freight in and out of Gailey would inevitably run slowly on and off the mainlines and reduce capacity. Eg. Kingsbury on the Birmingham - Derby line where XC try to run 8 trains an hour (four each way). Kingsbury junction has oil & intermodal freight and for Birch Coppice Intermodal Terminal (BIFT). There are many occasions when an XC train stands at signals waiting for an in or out freight train.

3.10 Why should green belt land be desecrated when a perfectly useable intermodal yard just five miles from the chosen area of Four Ashes, even less for Calf Heath is ready to be used? Extensive road modifications to the Orbital traffic islands and Cannock bypass for the new Macarthur Glenn shopping complex will be of considerable benefit to access in and out of the Pentalver yard on that route and provide connection to the M6 at junction 11 and on to the M6 Toll Road.

4.0 Proposal is contrary to the Rail Freight Strategy

4.1 This proposal will go against the recommendations put forward by the Freight Network Study 2017 which places significant emphasis on improving average speeds on lines, which it states is a "crucial factor in enabling rail freight to offer a viable alternative to road haulage and in encouraging modal shift to rail. At present, end-to-end journey time of freight flows on some key corridors can be very long and average speed very low, restricting rail freight's ability to offer a competitive service and price to its customers. The key drivers of reduced end-to-end journey time are the line speed capability of the infrastructure and the quality of the train path in terms of minimising the number and duration of stops made in passing loops. In terms of maximum line speed and the number of sections of low line speed e.g. permanent speed restrictions; improvements to line speed capability can include both increasing the maximum line speed (to 125 mph) on a route and reducing the number of sections of low line speed. The latter is particularly critical, since if a heavy freight train is required to slow to a low line speed, accelerating back up to full speed takes considerable time.

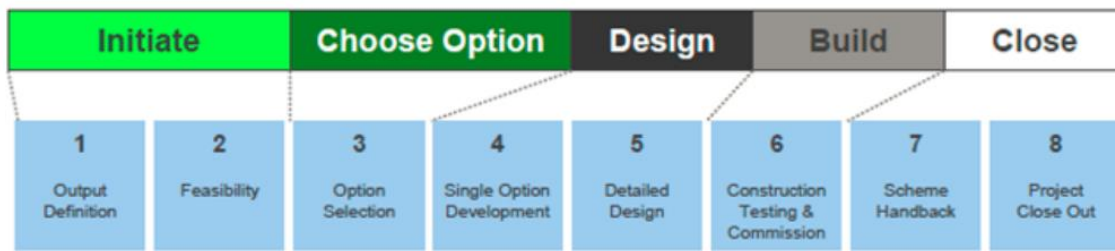
4.2 The WMI proposal would cause a further reduction to line speeds on the Birmingham Loop and no new freight paths have been proposed to support the proposal and facilitate freight use on that line.

4.3 The applicant has recently submitted to PINS, a Statement of Common Ground between FAL and Network Rail. It reveals that they worked on the WMI project with Network rail since 2008 until it was shelved in 2011 due to global downturn. During that decade the proposal has only reached GRIP2 (Feasibility). The GRIP process is Network Rails method of processing infrastructure.

That level indicates that progress is years away from meaningful agreement (whereas global downturn is with us again)

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Key stages of the investment lifecycle (GRIP Stages)



4.4 Additionally Network Rail have signalling works would be required; creation of sidings would clash with the loop lines electrification details; that considerable geo-technical modifications will be required (cutting situation); that serious ground contamination is present that could compromise health & safety and the water supply; suitable property easements were not in place. FAL pointed out that most of the sidings would be out of Network Rails control.

4.5 It is noted that FAL have mentioned the China UK rail connection as part of freight growth. However that is a high priced service for urgent items, too heavy for air and produced inland, that mainly assists Chinas Belt & Road political strategy. To replace a single container ship would require up to 100 rail journeys.

4.6 Further to a **Freedom of Information** request to Network Rail about line capacity and specifically between Bushbury Junction and Stafford junction, a reply was received citing commercial confidentiality.

Rail freight in UK is commercial and paths are considered assets by train companies and operators – who are required to bid for them. They are not compelled to use them and can therefore save them for future use, investment, or to restrict competition.

Hence there are only four main freight operators (FOCs); of those, the German State railway and US Genesee Wyoming Freightliner group dominate the market. Network Rail must continuously review and spend, to release paths on any route. There is apparently a recent study on line capacity for the project, that the applicants have not revealed.

5. Conclusion

To conclude; it is our view that the proposed development is an inappropriate location for a Rail Freight Terminal because of the reasons set out above. We consider that there are better locations for a SRFI and, therefore, a robust assessment should be carried out. Locally the facilities at Cannock and Telford all have better potential. The location with regard to existing demographics and business location would harm the region by worsening traffic movements and introducing industry into farming areas and damaging greenbelt.

In Network Rail's statements for financial period CP5 and projections for CP6, there is particularly mention of closing DIRFT 1 rail terminal and opening DIRFT 3's improved facility (to cater for full length trains); to progress with Liverpool and Manchester's SRFI facilities, 3MG and Port Salford, to electrify and recognise the Wolverhampton to Shrewsbury line as a Strategic Container Route; and of course to facilitate HS2 projects. No mention of working on, preparing for or having the need for Midland capacity in the form of WMI.

We note the global downturn mentioned in 4.3 is on the calendar again.

From the NPS, we can deduce that in order to qualify (and indeed prove that it will function as a Strategic RFI) the applicant should be required to demonstrate:

- **That the use of rail will be optimised.**
- **That the trip mileage of freight movements on both the national and local road networks will be reduced by the proposal.**

There is no such evidence to date

Further we request that the up to date confidential rail capacity study (Bushbury Junction and Stafford junction) is revealed that we have a further chance to comment upon it.