

Proof of Evidence

On behalf of
Stop The West Midlands Interchange

8. Wrong Location 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 proposed 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 Location of this development.

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

- Planning and Green Belt
- Railway Infrastructure
- Highways – including Independent Highways Consultants Traffic Examination
- Health
- Environment & ecological issues
- Tourism / recreational issues
- Agriculture
- Supporting Information and
- Answers to the Inspector’s Questions.

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SUMMARY OF OUR OBJECTIONS

This report examines reasons why this Location for an SRFI would be wrong. It links in to the other reports prepared by the community group.

It considers the wrong choice of location from the viewpoint of legislation, regulation and good practice. From Parish level through National policy to EU Directives and UN recommendations.

It considers the physical and environmental constraints that make the projects location both unsuitable and damaging. Road, Rail, Topography and Demographics.

It spells out the socio-economic ramifications of such a project and their negative impact on the community. Jobs, Infrastructure, Community Facilities, Traffic.

It looks at how changes in conditions, business practice and other projects have rendered the proposal out of date.

WRONG LOCATION

This Proof of Evidence presents reasons why the choice of location is wrong; considerations that may overlap with and elements that don't fit neatly into, our other report chapters.

1. Application History

The WMI project history has Kilbride's Peter Frost exploring his way up the M6 until he found a railway and a convenient few acres of farmland - probably helped by one of the frequent traffic jams on this part of the M6.

In reality the site appears on various maps & databases and has been land owner driven. The Monckton family own large swathes of land in South Staffordshire and have a particular interest in changing the usage of their outlying lands into something that generates a quicker and better profit than agriculture.

City trader Piers Monckton, chair of the Country Landowners Association, is desperately trying to change a substantial area of his farmland & pheasant shoot into Logistics use.

Paradoxically he is an outspoken critic of HS2 cutting through the countryside¹

Commenting on the challenges faced by Staffordshire CLA members Piers said:

"Staffordshire has been the sacrificial lamb of HS2. The scheme adversely impacts broad swathes of the county but brings precious little in the way of benefits....."

The positioning of SRFIs is not based on government research and planning, which would be much more logical (the Germans have a Rail Freight Masterplan² for that sort of thing: Six major Rail Hubs at six major cities: Hamburg, Cologne, Frankfurt, Heidelberg, Munich, Hanover and many small RFIs).

Or like France's Regional Master Plans; there the tendency is for large hubs on the outskirts or dual usage facilities within city centres (three currently within Paris city)

In the UK, positioning has been left to private finance using a list of minimum guidelines (due to lack of government funds or was the legislation influenced by vested interests?).

Thus it becomes one person or company's choice of location against the wishes of thousands of the local community. Money versus people.

If one was needed in this locale, Cannock is building a raft of distribution centres and other big shed businesses with an RFI adjacent. Put them together.

2. The unsuitability of WMI's location is considered first through the hierarchy of political regulatory bodies:

Parish Councils

The Local Parish Councils that bound the application site **strongly object** to the proposal. They have also formed a **Collective** to strengthen that objection. All have registered as interested parties to voice their objections.

South Staffordshire District Council (Host Authority / LPA)

The LPA **strongly opposes** the application.

South Staffordshire's Site Allocation Document (SAD) has been approved by the Secretary of State and was formally adopted in 2018. It does not contain reference to the site but contains other land referred to as more suitable, such as the former Royal Ordnance Facility (ROF) land close the i54 development.

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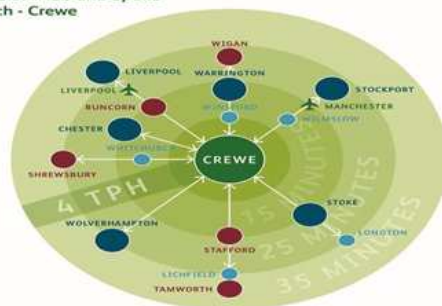
The Black Country and Southern Staffordshire Regional Logistics Site Study⁴ was commissioned to investigate potential sites and set policy. The WMI site was rejected.

Staffordshire County Council (Host Authority)

and Stoke & Staffs Enterprise Partnership

At County Level there has been considerable input relating to HS2 and its ancillary works. Whereas Stoke-on-Trent is deemed to be the County's economic core town and in greatest need of employment opportunity, the proposed HS2 route has circumnavigated the city because of engineering/cost issues; choosing instead, Crewe, as its major hub.

Example of 'Hub and Spoke' approach - Crewe



So given the dire need for a high employment project for Stoke (an SRFI possibly), their reaction has been muted.

When our opposition group met Staffordshire CC's economic growth leader Councillor Mark Winnington, we were told that the County Council would take a neutral position.

Mr. Winnington, whilst Staffs & Stoke representative at the MIPIM 2018 in Cannes (as was co-applicant Kilbride), actively promoted the WMI project.

MIPIM is advertised as the world's leading property market.

Staffs CC's Mark Winnington, & Wolverhampton City Council Director, Tim Johnson, jointly presented **the previously unheard of "M54 High Growth Zone"** including the WMI project and portrayed it as a "done-deal". **The Inspectorate** is referred to the YouTube recording:

https://www.youtube.com/watch?v=bLE_mFKNWOYf

Both West Midlands Interchange and Grosvenor Properties are portrayed as partners.

Towards the end of the clip we are told that:

Piers Monckton & the others "were about to receive Ministerial DCO consent later this year"; ending with a promise to potential investors "Tell us what **you** want and we'll give it to you..."

Black Country Core Group

Black Country definitions are likely to start fisticuffs, but the Black Country Core group is a collection of adjoining Local Authorities with some shared industrial past: Dudley, Sandwell, Walsall and Wolverhampton (not Staffordshire). The latter two (nearest) have expressed an interest in proceedings. All are railway towns and contain considerable areas of current & former rail land; including the large Bescot site straddling the M6 on the Walsall / Sandwell boundary. Paradoxically they do not have rail intercommunication and road transport between each is via heavily congested roads.

Wolverhampton is just setting up The National Brownfield Institute at the former Springfield Brewery site - adjacent to large reclaimed rail areas used by the University. This will become a national centre to support **brownfield** redevelopment.

Also at Wolverhampton, rail freight giant DB Cargo has just opened its 'state of the art' logistics centre - one of the largest investments in rail freight in the past five years¹⁰

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Specialising in steel imports it is brought to the Knowles Road facility by trains from the ports at Immingham, Hull and Boston.

Fig. DB Cargo Freight Terminal, Wolverhampton



The Black Country & Southern Staffordshire published a comprehensive Logistics report in 2013 -The Regional Logistics Site Study.

The **Inspector** is directed to its important content below or ref⁴:

<http://www.wolverhampton.gov.uk/CHttpHandler.ashx?id=1638&p=0>

It concluded that a comprehensive Midlands comparison should be made for sites; that the Highways Agency advised against large Logistics developments near the busiest parts of the M6. **The WMI site in Greenbelt was deemed an unsuitable use.**

A number of other potential sites were examined. The former Rugeley Power Station site (opposite to the giant lorry-served Amazon warehouse) would have been perfect. However with no interest shown in the last six years, the site owners are looking at housing options. Also Pentalver's RFI approved site at Cannock was amongst those recommended (below).

West Midlands Combined Authority (a grouping of the Midlands Authorities)

Although WMI have used the West Midlands title for strategic effect, it should be noted that most of the site is in Staffordshire - to the north of the midlands conurbation.

Whereas older West Midlands residents get free train travel – Staffs residents have to pay! **Transport for West Midlands** is the acting transport body for WMCA (bus/train/tram)

Midlands Connect and **Midlands Engine** are recently formed Quangos to facilitate business and transport within the area. Their studies and transport policy do not incorporate the WMI project but raise questions about WCML capacity.⁵

Transport for the North and the **Northern Powerhouse** are the equivalent quangos to the midlands ones mentioned above. They also do not incorporate the WMI project in their strategy. Despite the proximity of Manchester & Liverpool to our location, the northern logistics strategy, their port and SRFIs have been completely ignored in the WMI documentation.

The **Inspector** is directed to those northern freight policies⁶ with consideration for the SRFIs, HUBs, Ports and airports already in place or under construction as part of the UK network (particularly Liverpool, Manchester and Doncaster).

Telford, Shropshire and The Marches⁷

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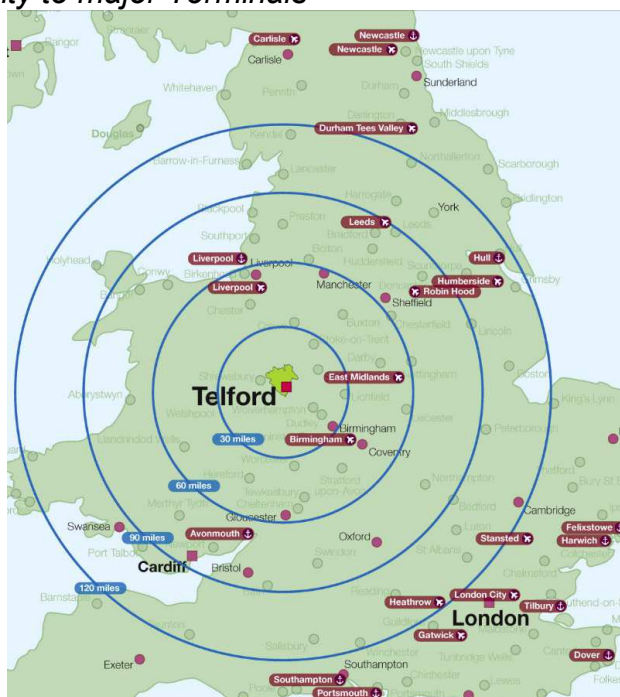
With limitations on their road and rail connections, those rural areas should not be discounted from local transport planning. The Marches & Mid Wales freight report is very detailed. Telford is the core economic township of Shropshire and regional growth point. All freight is routed via or through that location.

The three areas cite Telford International Rail Freight Park (TIRFT) at Donnington as their intermodal hub. It has been run by freight giant DB Cargo since 2012 (who has facilities at Wolverhampton, Birmingham and Tamworth and DIRFT) and is also used by Freightliner for Tarmac road stone transport from Telford to Hayes, Essex. The rail gauge is slightly limited for high top containers but easily upgradable (certainly a better gauge than that approved by the Secretary of State at Radlett SRFI). It is currently shortlisted for Heathrow Third Runways offsite fabrication facility and there is a planning application pending for mass car storage & transporting.⁸

2018 housing growth in Telford in particular, matches Cambridge as UK's highest housing growth area⁷ as well as some significant industrial and commercial projects. Of course, without the M54 northern link and better utilisation of TIRFT, much of that additional traffic will head down the A5 Watling Street to the M6.

Approval of WMI would cause even more road traffic to head in this direction.

Figure: Telford's Proximity to major Terminals



Cannock Chase District Council and the Area of Outstanding Natural Beauty

Cannock is a nearby town. Cannock Chase (AONB) is an ancient heathland and forest area that has special protection and that of its surrounding views. The WMI proposal would harm the vista. This is described in detail in our Environment Report and in the Cannock Council and CPRE submissions.

Cannock is just clearing land for the McArthurGlen designer outlet village¹³ generating one thousand new jobs.

A similar format to Clarks Village Outlets at Street, Chester and Ellesmere.

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Cannock / Staffs County has recently developed huge areas of former colliery land for distribution centres (Kingswood Lakeside Employment Park and others). Freightliner has an intermodal RFI at Cannock within 5 miles of the proposal. Network Rail has re-signalled and electrified that line and was been testing it in late 2018. Highways England raised clearance for the Strategic A5 at that location also. The facility has been operating as a road based container hub for the last decade (Pentalver).

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

One wonders why this group of buildings were not deemed an SRFI?



THE GOVERNMENT & NATIONAL BODIES

Parliament has debated and commented on rail freight issues numerous times in the last few decades. The results are written into the framework of planning law.

The Government actively supports the transfer of freight to rail for the dual purpose of assisting the rail freight network (decimated by the loss of coal transport – in contrast to Germany who still utilise coal) and secondly to help reduce our carbon footprints under the Paris Agreement for limiting climate change.

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Whereas the simple and laudable policy of moving freight from road to rail will undoubtedly improve emissions and reduce congestion over a comparable journey; logistics must consider the whole journey – most of which is not possible by rail. It cannot complete first mile, last mile, or transport wide loads, long loads, high loads, or our local canal boats.

PLANNING LEGISLATION

Planning Act 2008 (PA 2008) introduced the concept and basic requirements for SRFIs
National Planning Policy Framework 2019 (NPPF 2019) Does not address SRFIs directly but deals with Strategic considerations, Green Belt protection and Minerals protection.

National Policy Statement for National Networks (NPSNN) details the need for road, The Strategic Rail Freight Interchange Policy Guidance (SRFI PG) – provided further guidance and advice but has been superseded by the.....

National Networks National Policy Statement (Dec 2014) This indicates the importance of the strategic road and rail networks and suggests priority work to improve them. SRFIs have several pages describing their usage and importance. The NPSNN comments about the Midlands being well served and London and the South not.

This is also echoed within European transport legislation and Transport for London reports. Some of the figures & quotes tend to contradict its purpose such as: *If freight carried by rail was to increase by 50% (in terms of tonne kilometres) this would only be equivalent to a reduction of around 7% in goods carried by road.*

The National Infrastructure Commission stated in its Dec **2018 Future of Freight report**:¹⁴ *"Failing to plan and protect land for freight can result in logistics operators 'sprawling' further from the centres of towns and cities, moving further from their end customers and increasing delivery mileage, emissions and congestion. Although the issue lies mostly at the local level, solutions through national frameworks could help head off future problems".*
The **Inspector** is directed towards this current and very sensible report¹⁴

Network Rail

They are the **final arbitrator** of new rail connections and rail paths.

Network Rail's decisions are key to any rail related application via an eight stage process of acceptance known as GRIP (Guide to Rail Investment Process)⁹

It is noted that whereas WMI originally quoted they were at GRIP stage 3.

It is now stated as only at GRIP 2.

Since GRIP 1 only involves registering a description; the WMI is still at the beginning of the multi-year GRIP approval process.

This WMI is proposed for a deep cutting on a busy section of two track loop line with a significant number of rail traffic pressure points. The likelihood of getting approval for a connection and gaining sufficient freight paths is dependent upon Royal Assent for HS2; then the latter being built before paths could be released on the West Coast lines; and who else is bidding for paths.

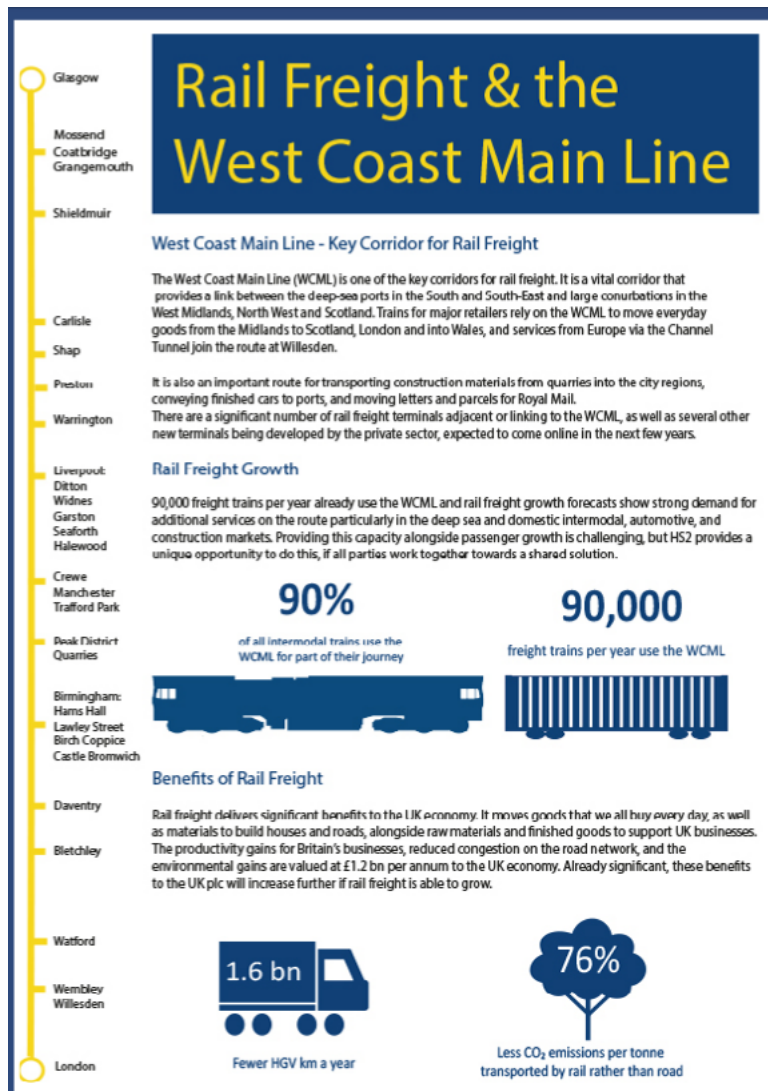
Note that this is a heavily used passenger loop line not the West Coast **main** line.

Network Rail has collaborated with the WMI applicants to produce a Statement of Common Ground (on the PINS application website). That document confirms the low level GRIP Stage achieved; confirms the importance of HS2 being built to release freight paths and lists a considerable number of caveats relating to time, duration and destination of freight paths - together with critical requirements for access, maintenance and the importance of train speed and acceleration to avoid the 125mph trains that already populate the loop lines' timetable.

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There should be no possibility of approval for a project of this size below GRIP stage 5 otherwise there is no safeguard for design suitability and availability of paths.

Key stages of the investment lifecycle (GRIP Stages)



Overview of West Coast **Main** Line features above (not **our** West Coast Loop Line)

Below is an extract from material sent in reply from Network Rail after a request about WCML capacity:

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.

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Highways England

Highways England is a consultant and facilitator and does not tend to give general advice. However in the Regional Logistics Site Study⁴ referred to earlier, the agency does advise against locating sites within the busiest parts of the Strategic Networks due to over capacity. Despite being classified as a Rural Motorway, the M6 at Gailey (j12) is also one of Europe's busiest sections of motorway and part of the Ten-T euro-strategic network.

Additionally our opposition group has engaged with them independently and at recent consultations for a nearby link proposal with the M54 to M6 north. (Also generating traffic problems and drawing on limited employees).

In its PINS submission the Agency explains the legislative and engineering impossibility of a direct M6 connection and takes issue with attempts by the Four Ashes Group to control part of the Strategic Road Network via its DCO wish list.

Highways England has also raised concerns about the WMI wanting a rail-less first phase of just warehouses without mitigation!!!

Are there any safeguards to prevent excuses such as: world economic downturn, Brexit, HS2 delays, lack of rail paths, engineering problems or lack of money; allowing phase 1 to be the cheap and cheerful final result and a nice little earner?

European Union

Prior to Brexit in March/April/May 2019? The UK has been the subject of a raft of European legislation for transport. Much has been incorporated into our planning controls.

The Combined Transport Directive (92/106/EEC)¹⁵ is currently the EU legal instrument for multimodal transport. Its aim is to increase the competitiveness of combined transport.

"Combined transport" means carriage of goods by a transport operation, consisting of an initial or final road leg of the journey, or both, as well as a non-road leg of the journey.

(Otherwise known as Intermodal or Multimodal or Transshipment)

Since Neil Kinnock's days in the EU transport office (1998) there has been progress towards a pan-European transport network.

Today the requirements are under the umbrella regulations known as Ten-T.

Technical standards and key road, rail and waterway routes are identified together with ports and airports within all EU Countries. There are also specific regions - of which we are in the North Sea Mediterranean corridor and there are also considerations of congestion

(Birmingham is noted thus)

The order of importance is quoted as London-Paris-Brussels-Amsterdam forming the central area of our corridor.¹⁶

A key requirement is for the nodes of the core network to have adequate road and rail connections. Birmingham, Manchester and East Midlands airports are also required to have dedicated road & rail connections. (Ten-T, Article 41 Part 2 Annex II).

The UK is quoted as heavily dependent on the North Sea routing and is urged to develop additional east-west routes. Liverpool Port is especially singled out for that. The recommendation would open up the north of the country, however take up of the recommendation has been slow.

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Fig: EU Core Network Corridors (UK is in North Sea Mediterranean Corridor)



In the UK, rail upgrade requirements have been identified for Felixstowe-Nuneaton and Southampton-Birmingham lines, the larger UK container ports and West Coast Main Line. The Northern Hub project, centred on Manchester would involve major upgrades in terms of capacity and electrification.

Development of Stations in Birmingham, Coventry and Wolverhampton are cited.

In Ireland, the major rail projects are centred on Dublin as their hub.

Ireland is a special case since almost all freight travels via England and there are traffic implications if not loaded on to rail at Liverpool.

Nowhere in the Ten-T regulations is an intermodal hub mentioned or recommended for our area and their critical hub positioning is based on multimodal hubs involving road/rail/air/water¹⁶ - hence mainly port and airport related nodes.

Global Imperatives

Whereas Britain's Planning Policy, the Ten-T and Combined Transport Regulations were originally framed around mobility and trade; a growing understanding of man-made environmental changes have altered the relative importance of some of those policies.

In 2016 the European Clean Energy Package was proposed to enact the Paris Agreement (Paris Accord). That was refined into politically acceptable (but still voluntary) legislation at the 2018 COP24 symposium held in Poland's coal capital, Katowice.

Those agreements are being incorporated into policy, to control the escape of carbon dioxide and other emissions. For the transport sector it basically spells the demise of the internal combustion engine in favour of electric motors (or hydrogen).

Whereas road and rail can have identical propulsion systems, rail's less interrupted journey, greater capacity and low friction movement will always generate lower emissions on a comparable journey.

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Of course, when double handling, last & first mile distribution and diesel trains are factored in, the calculation tends to even out.

Not only that, but pollution hotspots would be generated by the proposal.

But there are many dubious assumptions made with all such green calculations. Airport pollution calculations only use the first 1000 metres of aeroplane movement; rail trips don't include fuel type, final destinations, train lengths, capacity and freight handling; road journeys are usually just convenient guesses as to distance - with traffic queues not appearing in analyses.

Even more frightening, is the little-regulated shipping sector.

It has been calculated that the 15 largest container ships in the world emit as much nitrogen dioxide & sulphur oxide as the world's total 760 million cars!¹⁷ .

Since so much of the UK's imports are from China there is little option other than to consume less imported goods.

Whereas China's impressive Belt & Road policy has created several rail paths from its industrial heartland to Europe (including UK), analysts point out that it cannot compete with shipping on volume or air freight for speed but has an intermediate level & cost but most importantly a political networking purpose.¹⁸

PHYSICAL & ENVIRONMENTAL CONSTRAINTS

The unsuitability of the WMI location is considered below through the hierarchy of physical constraints:

The Quarry Ploy

The Local Planning Authority rejected the Moncktons previous attempts for a Logistics change of use and the family moved on to more elaborate approaches to bypass them. Archaic Manorial rights were utilised to gain **County** level permission to commence stripping the Grade 2 agricultural land for mineral extraction. Opposition was low because it was promoted as a resource of strategic national importance.

CBI 2016 "The entire economy of the UK relies on minerals".

But the mineral extraction at Gailey (on the WMI application site) has been **in breach of its planning conditions** for some months.

Permission was granted based on phased re-instatement back to agricultural use.

Local knowledge indicates that even backfilling was abandoned several months ago.

The County Council has not taken any legal action - although they have been informed.

We would ask **the Inspectorate** to examine this situation (refer to earlier County concerns)

Minerals extraction is classed as, of National Importance and was consented on that basis.

That importance has been underlined in NPPF 2019 and The UK Minerals Strategy 2018¹⁹

Using that partially stripped land as preparation for WMI would imply either a known outcome (refer to earlier concerns about County) - or its a very arrogant assumption.

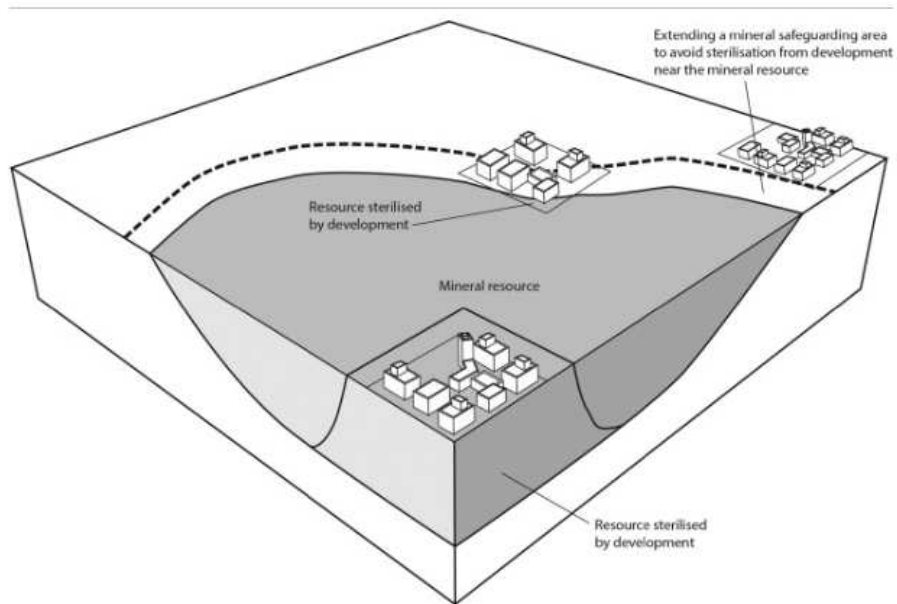
Equally shocking is the application statement that all mineral extraction would be abandoned immediately if consent was granted!

To sterilise the minerals would surely be contrary to legislation that was used for granting permission in the first place.

What is the primacy of three strategic calls on the land? Agriculture, Minerals, Logistics.

Minerals are irreplaceable & finite; Food is essential to life; Logistics pits companies against each other to deliver cheap Chinese products, that we didn't know we wanted.

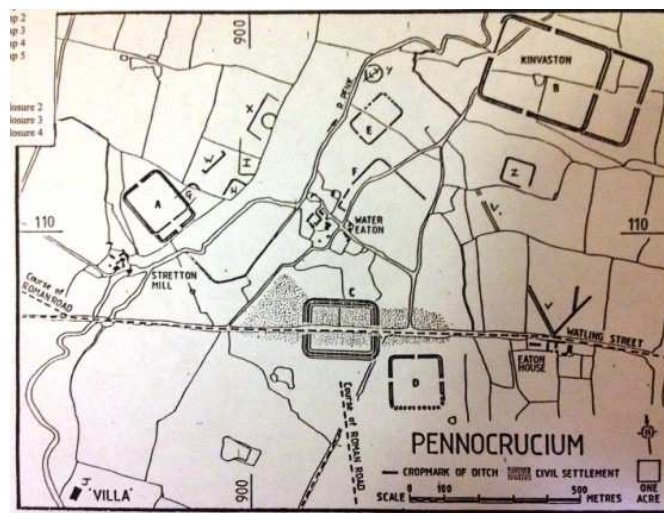
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[Download full-size image](#)

Fig. 2. The sterilisation of near surface mineral resource by surface development.

Worryingly the Archaeological report states that two medieval earth barrows disappeared after the quarry started. The A5 is of course a Roman Road, the confluence of Watling Street & Via Devana (military Road XI) with Roman settlement Pennocrucium at the west end of the site. The famed Anglo Saxon Staffordshire Hoard was discovered a few miles away.



A large area of woodland (mainly hardwoods including black poplar) has also been felled without permission, adjacent to Four Ashes. The Forestry Commission has taken some punitive action.

Refer to our Environment Report for additional coverage.

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MISCELLANEOUS OBSERVATIONS:

The provision of Strategic Rail Freight Interchanges has come about via a hierarchy of legislation and European & Global Imperatives

1. The proposal does not create a viable rail interchange let alone a Strategic one .
NPSNN states: *It is not essential for all buildings on the site to be rail connected from the outset, but a significant element should be.*

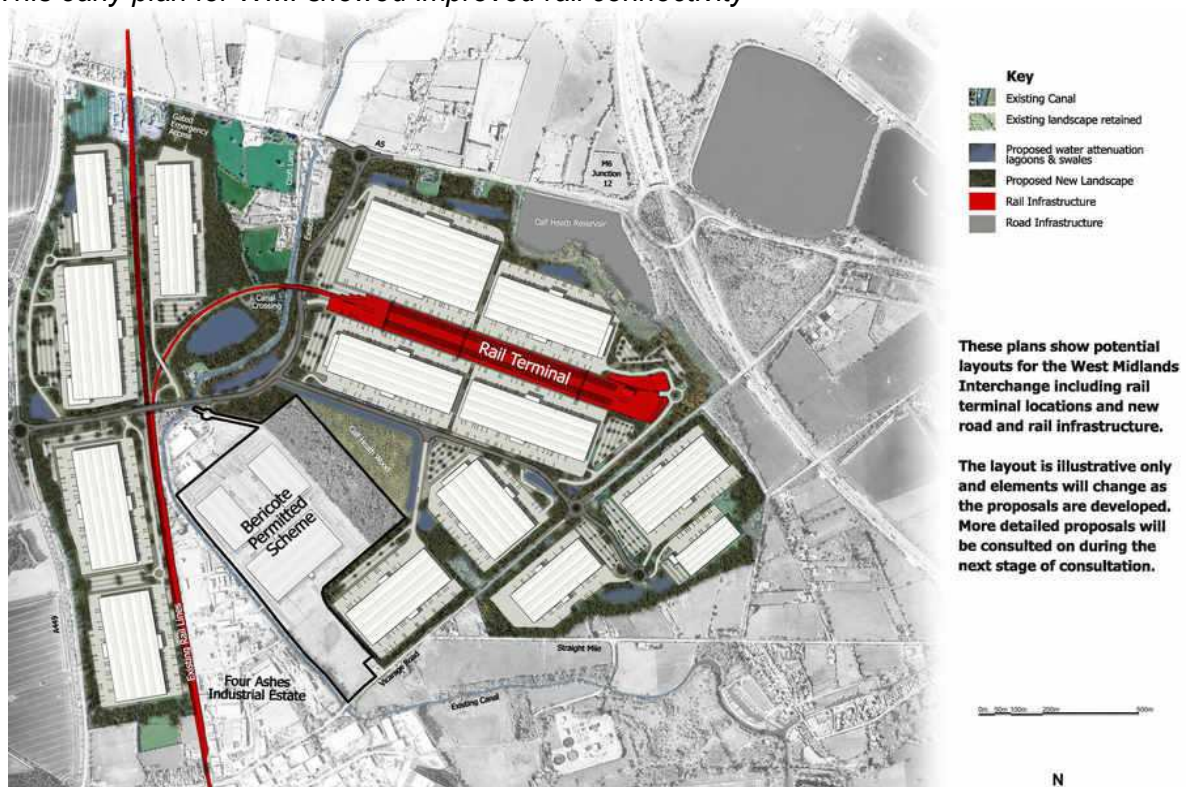
When the local community was first informed of the huge project they were shown **two** very different layouts and asked which option would you prefer - hoping the public would "vote" for the only workable one?

The "frightener" version showed true rail connectability (on plan) but was a red herring - that could not be built due to the large level differences and obstacles (such as a canal).

The current design is merely a collection of road-served warehouses nudging a minor 2 track loop line railway.

Only two small sheds are shown as rail served - to desperately try and justify the SRFI title.
Large level differences compromise this site.

Fig. This early plan for WMI showed improved rail connectivity



2. The proposed site is in an area of low population and low **un**employment, but next to some extremely busy **strategic** roads - that would be completely gridlocked if the WMIs predicted traffic surcharge were allowed.

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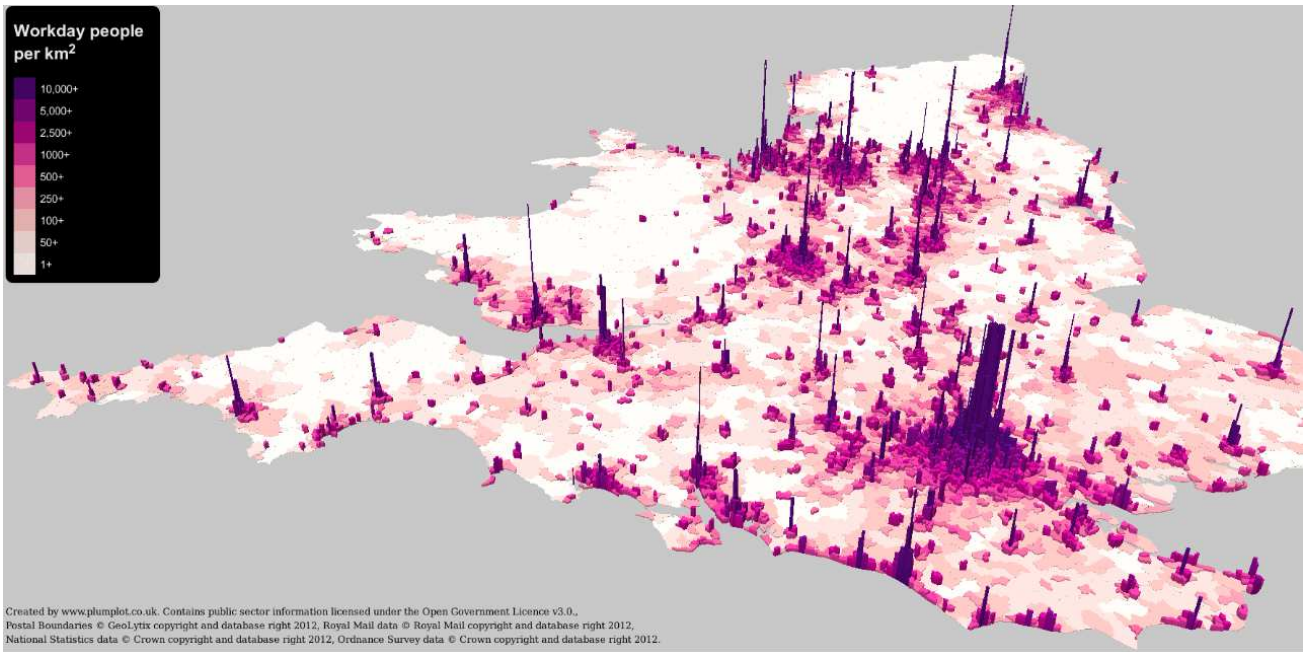


Fig. Worker Population of UK – showing our quiet location © Plumplot Royal Mail Data 2012

3. The WMI proposal is in an area with a small consumer base and minimal production facilities. At best it could only act as an intermediate staging post in a supply chain thus generating huge **last-mile** traffic (not shown in the WMI traffic data).

Intermodal facilities need to be at ports; in or near large cities or massive users to operate efficiently and without causing disruption.

NPSNN Table 4 It is important that SRFIs are located near the business markets they will serve – major urban centres

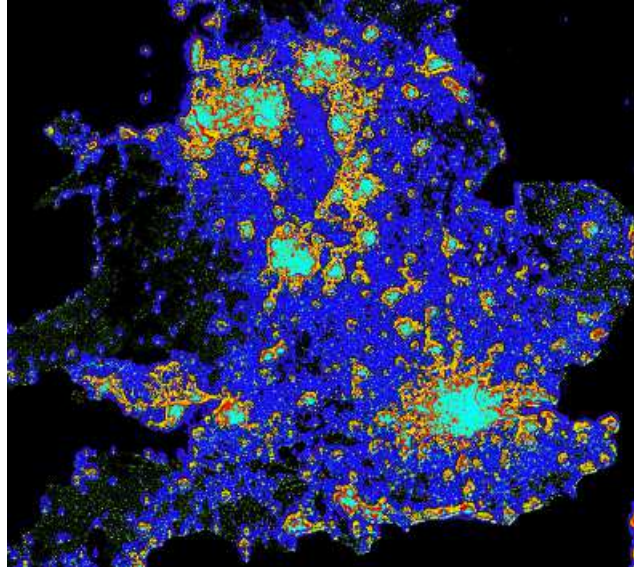
NPSNN 4.13 and so the location of development will usually be determined by economic activity and population and the location of existing transport Networks.



*Fig. Heat Map of Warehousing&Industry in England (Stowga)
- showing the lack of activity in our **quiet** area.*

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Fig. An Ordnance Survey Map showing Light Pollution and lack of, in our area



4. Bulk freight and long distances are where the real economies of rail freight lie. There is no bulk freight potential for this site. The staple bulk rail freight in UK has been coal, which is almost phased out in UK. Viewers of TV programme Australia Railroad will not see any multi-day journeys; 1000m+ long, double decker freight trains here. Regarding distance, the UK is very compact and most experts consider rail freight transport to be uneconomical and/or unviable with journeys of less than 100 miles.

The EU Commission stipulates that the **minimum** distance for multimodal trips should be 300 kms / 186 miles, below which transshipment costs & time render it **unviable**. Of this they recommend the maximum road distance to be 150km – with tolerance to use a specific terminal/ node / destination. Those distances need to be considered with regard to our location and that of ports, existing SRFIs & nodes and potential end users.

5. Other than bulk freight, domestic intermodal freight is stated in the NPSNN to be the only area of rail freight that will increase, other than Ports traffic and specialisations. Domestic Intermodal is basically shipping container traffic swapped between train and lorry. The containers "origin" may be domestic or from Ports, eg. imported goods. *Whereas most HGVs seen on our roads and motorways are 40 or 44 tonne curtain siders; shipping & rail freight demand modular steel containers with a hardwood ply floor. The slow growing tropical species used for the floors are being decimated by excessive demand.*²⁰ Containers are carried on a type of flatbed type trucks with a quick release swap system allowing the (40ft) containers to be easily removed. Ships bring in 5000 to 9000 each trip. The fuel burned by container ships exceeds that used by all diesel trucks and trains in UK.¹⁷

6. With reference to the catchment areas of established and proposed SRFIs, there seems to be more than adequate coverage for the Midlands in general and most definitely sufficient for this area, without the WMI. Golden Triangle Map and Catchment Area Map below were produced by Northampton Gateway.

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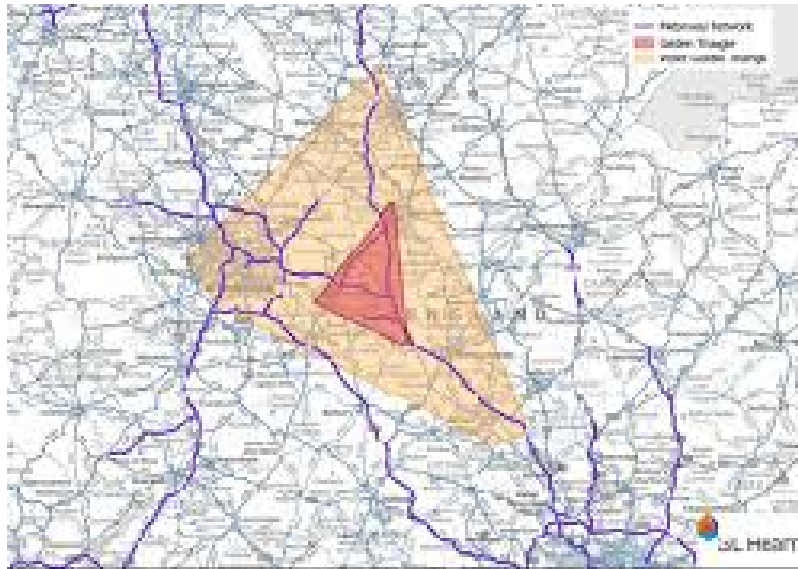
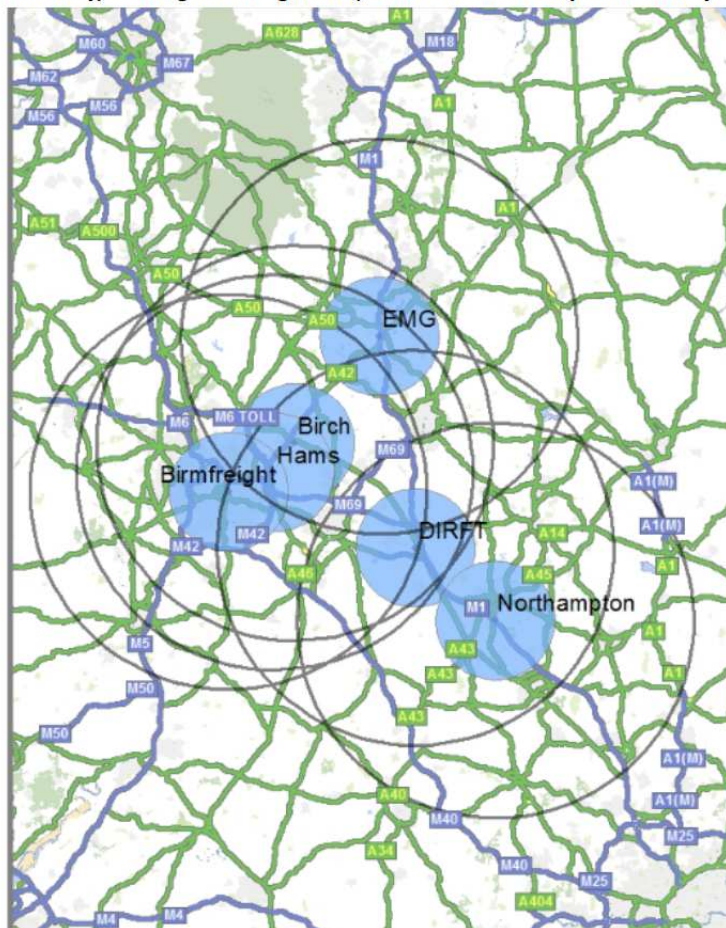


Figure 12: Secondary catchments of 50 km around Birch Coppice, Hams Hall, East Midlands Gateway, Birmingham Freightliner, DIRFT and Northampton Gateway



Policy documents all refer to the lack of SRFIs serving the London and the south and surfeit in the midlands. The only two southern "approvals" are likely to be used by Heathrow 3rd runway (Colnbrook) and (Radlett) blocked by local community, District & County Council – possibly now earmarked for housing.

Most other SRFIs are placed (logically) in or adjacent to very large conurbations, ports or within the logistics industry's preferred location - **the Golden Triangle** - the logistics industry's perfect siting for national access to business, road & rail transport links and ports.

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The Department for Transport (DfT) states in its Market review and Modal Shift Assessment that the Midlands is well served for Intermodal Terminals.

Similarly the NPSNN states:

Para 2.56 It is important that SRFIs are located near the business markets they will serve – major urban centres.

2.57 Existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North.

2.58 There is a particular challenge in expanding rail freight interchanges serving London and the South East.

Refer to data sheets describing other SRFI in the Appendix.

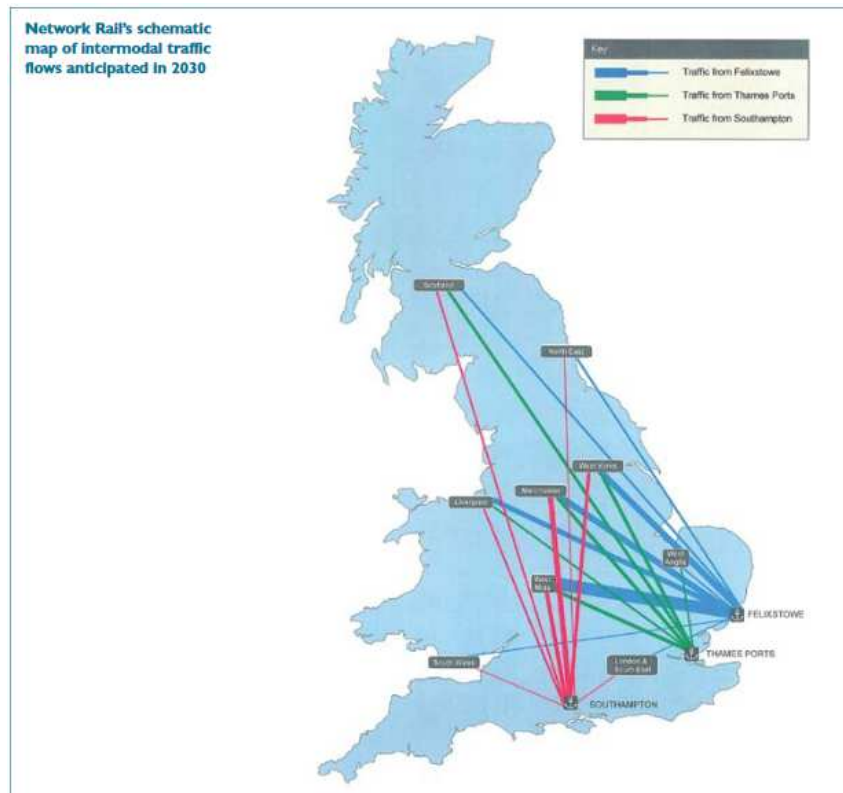
7. It is noted in the WMI application that the alternative sites / sequential test has not generated as many suitable sites as similar rail hub applications; eg. Rail Central.²⁵ The latter scored WMI reasonably (as it did a number of alternative sites) on the PA2008 basic requirements, but it was sieved out of the assessment due to being in Green Belt. Similarly DIRFT III raises the point that **one of the critical Green Belt tests is that the very special circumstances must show the inability for the proposal to be accommodated at an alternative location. This does not hold true for the WMI site.**

Whereas a developer's true answer would be "we don't own the other land so are not interested in rating it well". **It is essential that alternative sites are fully investigated.** We ask the **Inspector** to question this. To include the nearby ROF site and others at Stoke, Burton, Rugeley and Telford. As Network Rail state:
"There are hundreds of freight sites with connections to the rail network, as well as land in railway industry ownership with the potential for a new connection"

Many intermodal locations are owned by other logistics interests. The rail freight industry is carved up between foreign rail freight companies: German Deutsche Bahne Cargo, US Gennings Wyoming Freightliner, French Colas, Swedish GB Railfreight, and sole British player Direct Rail Services (formerly British Nuclear Fuels Freight). There are secondary users & facilitators such as DHL, Malcolm Freight and Stobarts who also have land or operational interests. EU legislation seeks to open access to all sites. Of particular concern is that freight paths are considered valuable assets and are bid for and retained even if not used. Network Rail has been unsuccessful in preventing the practice.

8. Network Rail's map below from their freight policy document indicates how intermodal freight might flow in 2030 from the major Ports. Channel Tunnel omitted?
Whilst showing only rail regions the Midlands & South Midlands takes the lion's share of container traffic. Transport for the North has more detailed data.⁶
The map does not show any receiving centre for London and the South this would be a failure of policy.

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Worryingly this is in accord with analysis of Freight for London by London Reconnections:

“The first thing to know about rail freight in London is that most of it goes through, even if some of it goes up to distribution centres in the Midlands and comes back in lorries.”

The **Inspector** is directed to their series of three very informative reports, which although south-centric, contain useful information for further up the tracks.²²

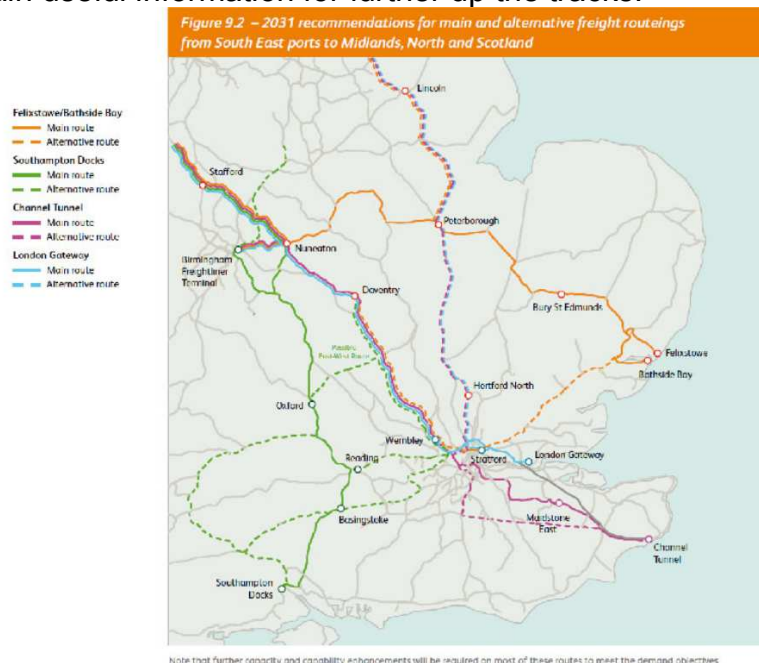


Fig. The DfT 2031 Rail Freight Routing Projection examines paths in more detail:

9. There are several viable RFIs that could serve our local area. Telford and Cannock are particularly relevant (as mentioned in the local political section) and there are other potential

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sites where employment is desperately needed (Stoke: Etruria & Other), that have not been investigated thoroughly. Also the ROF site with Hilton Park in South Staffordshire. Wolverhampton has not been thoroughly investigated for potential rail connected sites.

10. Traffic Flow Calculations. The applicant's calculations do not appear to have taken into account the physical size of the trucks (2.5 x car units) on the short lengths of road. eg. the A5 is proposed to be split between Gailey Island and M6 j12. The overspill generated will quickly compromise the M6 and adjacent Strategic roads. The long daily queues of traffic at peak times do not appear in the applicant's VISSIM calculations. As locals, we are aware of them as a twice daily occurrence. The definition of a traffic queue as used in those calculations must be defined.

11. The internal flow of traffic, especially from the "necessary" internal site distribution of rail freight arrivals via the proposed link road has not been allowed for in traffic flow calculations – nor has the 30mph limit on the link road (versus 50 for the existing roads).

12. The effects of other large on-stream projects at Cannock, Featherstone, Rugeley and i54 and the M54 link have not been considered with regard to traffic flow, resources and employment. Neither has the recently built Four Ashes factory of Spanish metal pressings producer Gestamp (relocating itself and its traffic from Cannock).

13. The proposal would generate huge construction traffic movements at the same time as: M6 Smart Motorways works are continuing, ROF site works commence, Cannock Designer Village being built; Rugeley Power Station re-development; the new M54 to M6 & Toll Road links being built and the nearby building of HS2 and its related facilities at Stone. The whole region would be compromised. Yet the GRIP stage of the proposal is at level 2 of 8 (Option Selection) - suggesting that approval of a new freight connection and rail paths is nowhere near guaranteed and may take years to progress. So no rail assistance only HGV traffic.



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14. If the proposed employment levels were accepted as accurate, there is insufficient information as to where those employees would come from and how?

NPSNN 4.87: SFRIs can provide many benefits for the local economy. For example because many of the on-site functions of major distribution operations are relatively labour intensive, this can create many new job opportunities. The existence of an available and economic local workforce will therefore be an important consideration for the applicant.
(Locally impossible – a small population & very low unemployment therefore no benefit)

15. If the proposed employment levels were accepted as accurate predictions, there is insufficient provision for public transport, sewage and other infrastructure and facilities for the numbers shown in the application.

16. If the proposed employment levels were considered to be overestimated (the profitability of the logistics industry hinges on minimum employment and maximum automation) - then where would the socio-economic benefits to the area come from?

Viewers of *Inside the Factory* and *Secrets of the Factory* are made aware of how few people are actually employed in Britain's manufacturing facilities.

A waste incinerator was located at Four Ashes industrial site some two years ago and is operated by French company Veolia. A substantial facility - but it only requires a dozen staff, ie. negligible contribution to local employment. Note that waste is being brought from Walsall and Wolverhampton and burned at this South Staffordshire facility, increasing local pollution again with no visible community benefit.

17. If the proposal is for a rail connected SRFI (the only way to get it into the Green Belt), then why does it show a "first phase" of non-rail connected warehousing as ribbon development along the A5 without rail connection or any railway facilitation works. If rail intermodal transfer is the desired purpose then that would surely be the essential (and required) first phase. Otherwise what safeguard would there ever be for an intermodal facility to follow? Imagine what excuses could appear!

NPSNN 4.88 The initial stages of the development must provide an operational rail network connection and areas for intermodal handling and container storage. It is not essential for all buildings on the site to be rail connected from the outset, but a significant element should be.

18. Whereas severe planning blight stemming from such a large speculative & phased application is not an allowable planning objection; we would still direct the officer's attention to the declared socio-economic benefits and to those DCO boundary red lines forming "islands" isolating dwellings and communities in a permanently depressed state. HS2 addressed that from the outset.

19. The provision of SRFIs as promoted by the government originally stated that due their size and nature it may be necessary to site these in countryside or greenbelt. This was been revised in the NPSNN to "it may be that countryside locations are required for SRFIs" indicating that the use of greenbelt is much less reasonable.

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NPSNN 4.84 and 5.172 Promoters of strategic rail freight interchanges may find that the only viable sites for meeting the need for regional strategic rail freight interchanges are on Green Belt land.

Promoters need to recognise the special protection given to Green Belt land. The Secretary of State would have to be convinced, and promoters would need to demonstrate, very special circumstances to justify planning consent for inappropriate development in the Green Belt (see 5.178). The 2019 NPPF reinforces this also.

20. The definition of an SRFI requires that logistics should be alongside major rail routes (*not 2 track loop lines*) and near to the conurbations that consume the goods (*which would not be the case*) *NPSNN p2.45*



Fig. The West Coast Main Line requires regular night time maintenance usually closing two tracks. We only have two!

21. It is often thought by those that don't see or hear them, that the M6 or Rail lines are quiet during the night. As the picture above shows, rail maintenance is normally carried out at night, as are (slow) freight movements. The M6 never sleeps; a slight lull at 10pm is followed by a surge of newly filled HGVs at 11pm from distribution centres. The next few hours consists of mainly commercial traffic - sometimes flowing, sometimes overflowing back on to the A5 and A449 as motorway roadwork's (also carried out at night) and accidents (no hard shoulder here) compromise that flow.

By 5am both the commuter surge and the early start HGVs begin again. Only the M6 Toll is quiet at night.

22. Community Impact

NPSNN 2.51 The environmental advantages of rail freight have already been noted at paragraph 2.40 and 2.41 Nevertheless, for developments such as SRFIs, it is likely that there will be local impacts in terms of land use and increased road and rail movements, and it is important for the environmental impacts at these locations to be minimised.

The location of the WMI is where the M6 and A5 are running significantly over designed levels for all traffic. The M6 is one of Europe's busiest roads.

Similarly the Birmingham Loop Line Railway Track is also at its limits without major assistance and path re-structuring.

So, there is already no scope for a major increase in traffic in either mode, let alone the gigantic increases presented by the proposal.

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As a consequence of the size of the project and the previous observations, environmental overload would certainly occur if the project were to gain consent.

Devastating gridlock would be inevitable.

The fragility of the system is quite obvious when a HGV stops and turns into the fuel station on the A5 - **causing an immediate traffic jam**. Previously, (2 years ago) the fuel station did not accept HGVs. Now most large Council vehicles have an account there.

Its position would work in opposition to the link road. Below is a familiar traffic map:



23. Our area is rural, even our section of the M6 is classed as a rural motorway by Highways England. However the traffic in the last decade has increased significantly due developments at Cannock and Telford and the inadequacy of the M6 and its frequent road works and accidents.

Much of our area does not have gas supply and much of the electricity supply is from overhead lines.

There is little public transport. Whilst Penkrige is a busy village hosting a twice-weekly market, the big banks have closed their rural branches following the last financial scandal. There is a rudimentary bus service between Stafford - Penkrige - Wolverhampton, but personal transport is virtually essential.

There are two Co-op supermarkets, a Sainsbury mini-mart and a Farm Store.

Those stores require about one container-load of deliveries a day between them.

The huge predicted increase in commuting workers required for construction, then the operation of the proposal, would swamp local infrastructure: police, ambulance, fire, doctors, dentists schools and infrastructure as well as compromise those already commuting through the area.

24. The proposal (to mitigate the loss of surrounding fields, trees and landscape) has proposed two "community parks". Let's call these: Pylon Park and Pollution Park.

Pollution Park would be that shown on the A5 near Croft Lane, subject to the greatest increase from vehicle emissions and brake dust.

(Four Ashes Ltd, to release more space for warehousing, propose removing electricity pylons and burying the high voltage cables).

Pylon Park near Calf Heath, would be positioned exactly where the HV cables transition between underground and over ground. ie. Which would not be commercially acceptable?

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25. It is noted that adjacent Local Authorities Walsall and Wolverhampton have expressed an interest in the WMI project, despite the objections of the specific LPA (South Staffordshire District Council).

Officers should note that both towns are historically Railway towns and both still have significant (disused) rail yards but have also actively compromised some of their rail yards, allowing housing or commercial development on them.

Wolverhampton has a large rail freight terminal for steel run by DB Cargo.

Walsall, at its border with Sandwell, contains the very large brownfield site of Bescot (picture below) comprising derelict railway sidings and marshalling yards.

Network Rail is hoping to use a small part of the site for making concrete railway sleepers - surprisingly specifying HGV only movements to bring in materials, presumably because it is impractical and unviable to use rail for short distances, last-mile trips and specialised uses.



26. **The Last Mile or Final Mile Conundrum.** (Or First Mile!)

A logistics term for the last part of the trip from interchange to end user (or vice versa). Likely to be the most inefficient and pollution generating part of the article's journey.

NPSNN 2.49 Indicates that the Government has accepted the figures in *Table 3 (rail freight usage)* as robust and suitable for planning purposes. Those figures indicate that the only non-port growth in rail freight will be the domestic intermodal category (all other sectors are static or declining eg. coal).

Domestic intermodal is basically shipping containers (of consumer or commercial items).

Without a nearby large user/consumer base (or major producer) the facility simply becomes a temporary store or staging point that generates traffic chaos and inevitable carbon generation as it travels its final mile(s).

There is no close consumer base here requiring (or producing) such large quantities of deliveries. And regardless each full train load is supposed to be the equivalent 76 HGV loads. Part loads are neither viable nor desirable.

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So each train would require at least 76 empty HGVs to arrive (from?), to be loaded and 76 laden HGVs to depart to (miscellaneous destinations?) via the busiest section of the motorway.

Or perhaps 200+ vans could be used.

At least 4 trains are required by legislation with 10 per day quoted by WMI as possible.

This is conveniently omitted from carbon calculations.

Of course if the loads and destinations were not matched then the vehicle number would increase and viability would be lost.

26. The principle of fully laden 775m freight trains transporting containers or bulk products from Southampton up to the north of England and Scotland or shuttles from London Gateway Port to an eventual London SRFI, is what the system and hopefully the aim of the legislation is all about.

Not the abuse of the word "strategic" to bypass LPAs and shoe horn warehousing into green field and green belt sites via legislation written by the parties involved in the business, profiteering under the guise of preventing climate change.

27. Britain does not have a good track record with vehicles and transport. Virtually all road vehicles are produced by foreign companies. The history of our own industry is one of inept or greedy mismanagement. The last debacle was the diesel vehicle promotion of 2001 and before that the Toll Road scandal.

Even the Bloodhound land speed record vehicle was scrapped due to lack of funds.

Since the Dr. Beeching cuts and the privatisation of railways, almost all rail freight companies are foreign owned.

There are many older railway engines still running with 30 year old polluting diesels and virtually all modern locomotion is foreign produced. See para 30.

There are even a number of railway engines currently being retrofitted with new diesel lorry engines. Network Rail to explain.

It is a sad & embarrassing history that should have lessons to be learned.

Let's not make further mistakes for short term gain, in an economy with little underpinning.



28. Also consider that any new industry foisted upon our area is unlikely to be new. It would almost inevitably be shifted from another location. Tempted by financial incentives, the need for bigger premises, modernisation, change in business patterns, etc.

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Even leviathans like Amazon usually only rent on a 10 year basis and then re-assess. (interestingly their massive base at nearby Rugeley has made no move to connect to rail despite the long-time availability of the disused power station track adjacent. They have found it necessary to bus-in most of their work force from as far away as Birmingham. So some other area would lose 1000's of their jobs in order to re-locate to our area..... an area with very low unemployment or it becomes necessary to bus those 1000s in (as Amazon does from Birmingham).²⁴ Or automation could remove the employee problem but demolish any socio-economic benefits.

29. Can lessons be learned from the EU? Europe's largest rail freight market, Germany, has a Rail Freight Masterplan. It states for the positioning of their "strategic" rail hubs: *Today, the six major rail hubs (Hamburg, Cologne, Frankfurt, Mannheim, Munich, Hanover) are already at virtually full capacity. Upgrading these hubs will remove bottlenecks, thereby reducing service disruption and making it possible to ensure that additional movements can be handled as planned.*

The rail hubs in most first world locations are located in cities (where the population requires them). In USA, last mile distribution is causing serious problems. Under consideration are using empty town centre shops & offices as distribution and collection facilities and severe delivery restrictions..

30. **Diesel versus electric traction.** Extract from Network Rail Nov 2017 Freight Forecast: *"No assumptions have been made in terms of a possible switch towards more electric traction, and our cost models are based on the use of diesel locomotives. This can be interpreted as an assumption that electric traction will not offer significantly lower costs when all its limitations are taken into account. The market would appear to bear this out in the short term, given that new diesel locomotives are still being bought by the commercial freight operating companies.*

However it is unlikely that by 2023/24, bimode or electric-only locomotives will have made significant inroads into the predominantly-diesel locomotive fleet."

So Diesel it is and no mention is made of environmental impact.

<https://cdn.networkrail.co.uk/wp-content/uploads/2018/10/Rail-freight-forecasts-final-report.pdf>

31. The Daventry International Rail Freight Terminal DIRFT is mentioned numerous times in the WMI application - modelling itself on the project and quoting its traffic and transport figures. Developer ProLogis in their planning submission to PINS for DIRFT 3 (proposal statement p.03) suggests they are wanting to create an expansion of the existing facility to avoid the disruption of a new site like WMI propose:

"The team believes there are clear benefits of expanding DIRFT compared to the development of a new site which would create greater disturbance and environmental and social impacts." We agree.

It is also critical of sites attempting to use Green Belt for inappropriate development.

32. Referred to in our Environmental Report, it is of concern that there is substantial ground contamination (especially Phenols) recorded in the western section of the proposal²⁶. It is further noted by Network Rail in the Common Ground document.

32. It is clear from the applicants trip figures that the facility would generate considerable CO₂, CO, NO₂, SO₂ & lung damaging particulates (obviously much more than if the facility wasn't built). The applicants will resolutely argue that parliament has stated that more SRFIs

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should be built therefore it is fulfilling national need - and just as worryingly, the box ticking nature of carbon reduction targets also favours such simple acceptance.

So the test is:

- whether the proposal at this location, with 85% of its warehousing **unconnected** to rail and sited on greenbelt farmland, can be deemed an SRFI and does it demonstrate any special circumstances whatsoever and show any national, financial or environmental benefit over & above the dozens of other road based warehouses in the region that are not on greenbelt farmland;
- whether the proposal at this location would provide any socio-economic benefit to the small local community - we see none;
- whether the proposal at this location, could demonstrate a national improvement in air quality or economy; when the uneconomical rail distance from major conurbations or ports, the indisputable "final mile" problem and the transshipment double handling are factored into carbon and air quality calculations.
- whether the proposal at this location, (on a busy passenger line with limited freight paths), would compromise (increasing) passenger train operations and would jeopardise other nodes correctly situated near to large conurbations and areas that cry out for jobs (eg. Stoke).
- whether HS2 will go ahead with the current economic downturn.
- Whether the A5 and M6 would be hopelessly compromised by the HGV overburden if WMI went ahead.

5. FUTURE CONSIDERATIONS

1. Our farmland is as strategic (if not more so) as our transport. Mineral extraction has been allowed on part of it under the argument of being of great national importance.

So are intermodal freight hubs now being touted as being of still greater strategic importance? What of Agriculture? What of Green Belt?

Under that hierarchy, basic human needs should be re-appraised!

Considering that road – rail modal change is directly or indirectly climate change driven; then agricultural resilience, the protection and preservation of our farmland and food source must surely be more important. Should climate change effect warming sufficient for sea levels to rise there would be considerable land loss on the east coast thereby ranking central and western farm land as an even more important resource.

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Leaving the EU and having to find new sources for food produce, whilst global production becomes more stressed, is surely demanding of increased protection for already established farmland. The 2019 NPPF reaffirms the point.

2. In consideration of other SRFI projects in position, being built or entering the planning system, is the facility is needed anyway? Do on-going national and global changes render its purpose un-necessary or unsuitable?

The network of SRFIs already built or in progress, will fulfil the logistical requirements of all but the most populous locations in UK. Only Greater London is badly served. So the benefits of a further scattering of huge SRFIs will have already passed its sell-by date like out-of-town supermarkets.

3. The WMI proposal quotes a building programme in excess of 15 years (running alongside all the other major building programmes in the region). (Any first phases or initial buildings has no SRFI status – so zero or negative impact or benefit.

By then priorities, policies, solutions, Europe and indeed the world, will have changed.

The European Directive that created the requirements will shortly be revoked when Britain leaves the EU in March/April/May/June...

The (voluntary) Paris Accord plan can only be achieved through considering population, food production, consumption and active carbon capture. Improvements in transport are already in the pipeline they will achieve much more benefit than new warehouses can.

4. There is already a marked global downturn and the commercial part of sub-prime bank dealings is just about to bite.

China's economy has slowed down considerably and is turning inwards now its own consumer base has reached a certain socio-economic critical mass. They have the main parts of their Belt & Road strategy in place and their own resilience is therefore guaranteed.

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Initiatives towards better quality/value goods, (Right to Repair movement) and concerns over waste and throw away clothing will also have a controlling influence.

For the UK, Brexit will cause a temporary economic downturn & generate special challenges (eg. food supply) and necessitate restrictions and controls on the population.

5. Meanwhile people are being directed to think about healthier, simpler lifestyles; having greater environmental awareness; are increasingly concerned about the motives & benefits of huge low-taxed conglomerates; concerned about protecting local environment & green spaces; realising the increasing importance of arable farming.

On a technical front: the promise of vastly improved automation & robotics in logistics; and of transportation efficiency increasing with new cleaner propulsion. Looking for better quality longer lasting products – the rise of Right to Repair movements.

Previously ignored population increases, vehicle numbers, changes in vehicle propulsion and food requirements will generate a raft of government and global travel & transport controls (including road charging) that will free up sectors and improve resilience.

6. Much of the scramble for "big box" type of warehousing proposed by WMI has been generated by privatisation (duplication within the delivery sector); the temptations of next-day delivery and cheap throw-away Chinese imports. Inevitably the richest or strongest (or the foreign state supported) snap up the competition. The resultant global elite are then left with only one strategy: cut costs & staff (bigger, taller buildings, more automation, etc.) and to maximise profits under the guise of efficiency and mergers.

All booms and get-rich schemes have a pattern which investors follow. The savvy ones exit before the inevitable regularisation event - usually leaving the public saddled with the loss:

Tulip mania, the south sea bubble, the missippi scheme, the silver bubble, the dot com boom, the utility companies share fiasco, the car industry for a pound, black Monday, bank rogue traders & bank rogue trading, , the sub-prime debacle, the Panama papers, the Bit Coin destabilisation, the Oderbrecht Construction Scandal, the Lavalin Construction Scandal the internet sales & next day delivery boom.

7. Danone Example

As part of their explanation of how the rail freight hub would work and its benefits, the applicants have suggested Danone water as an example of the proposed operation.

So ship water from France by rail, add value here (put labels on and double the price?) then truck distribute it around central England.

Why not just get Buxton water (also a global brand) from a few miles away - and avoid all that additional transport pollution and carbon footprint? Or as Pepsi do, filter tap water?

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CONCLUSIONS

The world is changing. Policies and technology from 15 years ago will not be viable or desirable 15 years hence. The NPPF urges policy writers and decision makers to look ahead at least 15 years to anticipate changes and requirements.

Lack of protection for strategic & important industry in UK has resulted in foreign takeovers, mergers and asset stripping on a grand scale. It has only recently (2017) been addressed by government - to the shock of many – most believed there was nothing left to protect.

The problem with logistics is that making a profit necessitates selling more product – but unless it involves a production factory, that means transporting /importing more (usually from China). At the same time, minimising overheads such as employee & transport costs. Then there are constraints imposed by environmental legislation due to emissions generated and by the (global) shortage of drivers (truck & train).

Yet that negative impact on the country's infrastructure (and global impact) is only tempered by the taxes paid back by the (offshore?) facility owner and the re-investment of money by the non-robot element of the work force.

Amazon is the classic model – e commerce at its simplest. A multi billion dollar warehouse & racking business where goods are shipped in cheaply by any means. A cheap big shed is leased for 10 years with whatever deal the local council gives. Fill it full of racking for merchandise. Rigorously computer control the inventory.

Use the cheaper of, computer & gps assisted humans or automatic stackers to pick.

Seasonal employment and zero hours contracts keeps the labour cost down.²⁴

Have external delivery companies compete for delivery contracts.

As Jeff Bezos puts it:

Low prices

Fast delivery (often same day)

Earth's biggest selection

Ask at nearby Rugeley, what community advantage it provides and why they don't use the rail connection. It is likely to move to East Midlands Gateway for the next 10 year cycle.

There is also a dilemma with Road & Rail Transport. Our rail system is very busy with almost no free paths. Passenger traffic has priority with its good environmental credentials.

But it has also become policy to fill the rail freight gap left by coal's demise and oddly to allow private developers to scatter strategic developments around the country with little or no guidance from government on location, suitability or benefit.

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Meanwhile, excessive competition, a lack of road freight pricing and a general anarchical road freight structure ensures that motorways, A-roads and laybys are overflowing with HGVs - often much larger than needed (apparently it is cheaper just to buy the biggest).

There is concern that intermodal shift legislation originates from EU Directives, and;
Given that 80% of rail freight is German controlled (Deutsche Bahne) and;
Given that Germany still generates 80% of its energy from coal and is currently laying the Nord 2 gas pipeline between itself and Russia (that will make it Europe's largest supplier). Whereas Britain has closed its coal mines and cut ties with Russia. So,
Given that 80% of global trucks are German produced (Daimler) It is reasonable to expect a bias or influence on EU & UK transport policies.

Eg. The government via TRL contributed £8.1million in 2017 to the pan-European trials of Platooning - the electronic connection of two or more HGVs to drive in convoy, ostensibly to provide fuel savings and improve traffic flow.

Very recently (March 2019), Daimler, pulled out of the trials stating that fuel saving by platooning was minimal and that they intend to concentrate now on their autonomous vehicle technology (to solve driver shortages) and on developing alternative propulsion systems.

This all points to a fragility and lack of resilience in the system; a disconnection of people and policy (especially when policy is only influenced by financial interests). The Logistics industry has become more important and profitable - than the goods it handles.

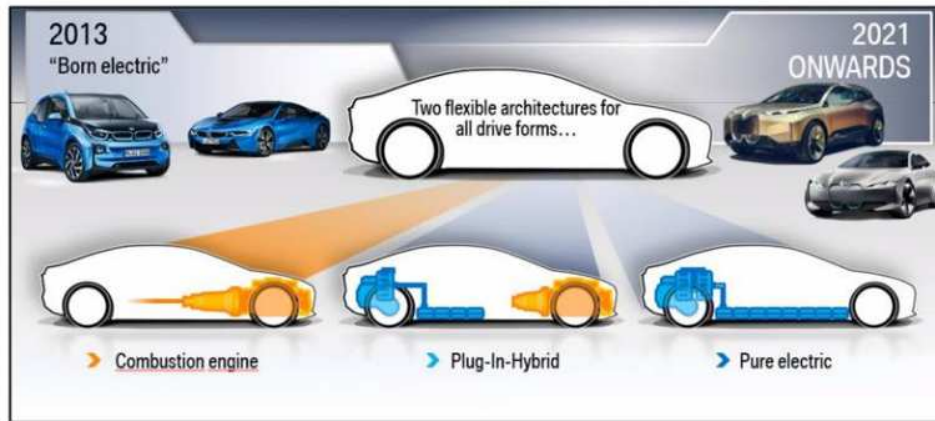


European Truck Platooning Challenge, 2016

Volvo, Scania, MAN, Iveco, Daimler/Merc, DAF.
Is Platooning dead or will Autonomous Trucking enhance it?

That decision making and fragility is illustrated for co-applicants, Kilbride. They have several claims to rail fame: a rail connection for BMW at Hams Hall RFI, Birmingham and a rail connection to the Honda production plant at Swindon. Now the BMW engine plant at Hams Hall (currently closed for Brexit) produces small internal combustion engines fitted to their Hybrid cars. The electric motors and batteries are made in highly automated factories in Germany and China. As we near the watershed year for electric propulsion (see the diagram below); the Hams Hall plant will have to shed workers or close, regardless of rail connectivity.

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The new architecture allows BMW to offer all powertrains on one platform: EV, hybrid and conventional ICE

Credit **BMW**

At Swindon the rail link appears to have been a box ticking exercise (Rail observers have commented that it would be nice to see a train on it). Meanwhile a daily convoy of 400 HGVs have shuttled between Swindon and the European headquarters in Belgium.



In February came shock news of the plants complete closure by 2021, putting 7000 employees out of work – citing electric propulsion as the reason for shifting production to Asia. Perhaps the site is ready for an SRFI?

(Such drastic changes to the motor industry as required by the rapid electrification process and also the chance to continue production of IC engines has generated substantial re-location to Asia – even Dyson).

So rather than continue with a chaotic profit driven system. Surely it is in the best interests of UK to draw on best research and projections to try to future proof that system.

Work with the existing robust network of SRFIs - just sort out the South of the country.

By religiously insisting on “strategic” sized facilities instead of utilising existing smaller facilities it is open to abuse by developers, the chance of approvals is reduced and the local population is alienated and made worse off.

Wasn't that policy also formulated by vested interests?

Why not embrace smaller RFI facilities including existing sidings and sheds, especially city centre ones. London and the South is unlikely to have the land for Strategic RFIs.

Use a Hub & Spoke network instead to couple road and rail distribution. Hello Cannock.

Adapt unused office accommodation for collection and distribution points.

Mega sites only benefit their mega sized operators.

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Ensure that existing EU Directives, and/or new UK ones, regarding shared rail terminal access and shared locomotion access are policed - not ignored as in many EU countries. Better still, shared ownership with a government percentage. Prepare for electric and hydrogen fuelled commercial vehicles and plan for autonomous HGVs and LGVs. That combination should achieve the benefits that SRFIs set out to do.

Most of Europe is using up its coal reserves for generating electricity - the fact that we have stopped moving coal around could have been assessed first. Quickly introduce a road pricing system for freight (that will reduce and control HGV numbers, promote efficiency and assist on driver shortages) and for electric vehicles (instead of pretending that zero road tax is possible). Temper the desire to mandate too soon for electric cars – we have no indigenous car industry (wonder how that happened) and the third world are still only paying lip service; there is no long term supply and recycling of battery systems, sourcing of component materials (lithium and cobalt batteries have long lead-in times) and what for electrical supply (Chinese nuclear?). For God's sake don't sell off any more strategic elements to global companies, banks, foreign governments and pension funds; and get a population control policy. Tinkering with the peripheral things and ignoring the elephant in the room will never provide a solution. Allow passenger rail to achieve the quality standard expected in the modern world and not just try to cram the rail network and rely on smart signalling. Embrace modern localised production that is the backbone of the fourth industrial revolution (i4). Techniques that will reduce transport, stockpiling, waiting times and waste. The current popularity of big boxes is the manifestation of an internet led trend that has yet to reach maturity. It is currently causing alarm in USA creating "Dead Mall Syndrome" in towns. In the UK, the out-of-town supermarket trend had to be legislated against some ten years ago in a belated bid to protect town centres. France & Italy have focussed on integrating logistics within multi-use city centre facilities. Protect the environment and countryside and greenbelt



Our community doesn't like HGVs and we are thankful they only pass by. We don't dislike trains as they roar through, but are pleased when they've gone. We love our farmland and natural environment. Residents **choose** to live here. We are well aware of the reported benefits of rail freight and the connectivity of HS2. But we are not major users or producers and a reduction in road traffic could not, by definition, occur around a freight hub. This community has very low unemployment - even for South Staffordshire. The size of local villages and their facilities already limits usability or expansion.

Strategic Rail Freight Interchange

Not only would there be zero socio-economic benefits from gaining an SRFI - but the local "fabric" of society would be damaged and our facilities could not cope.

There is obviously huge personal gain to be made by the project applicants but it is not innocent bounty. The Monckton family are well aware of community feelings about mineral and logistics proposals from decades ago.

Ploughing the profits into the Bundesbank or Grand Cayman would not help this country.

There may be financial gains for district and county councils in the form of local taxation and planning agreements but it would come with a complete loss of goodwill from the public.

And of national gain we also see nothing; the environmental benefits from using this rural location will be negative when first & last mile is factored in. National economic benefits are not there either, since other SRFIs are already nearby and congestion would be negatively impacted by the huge traffic increase on the strategic network.

This may not be Britain's finest landscape - but we are all proud of it.

We definitely don't want it to become a stack of containers, sheds and HGV jams.

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Strategic Rail Freight Interchange

APPENDIX: Intermodal Rail Freight Facilities as mentioned in this report and WMIs submission.

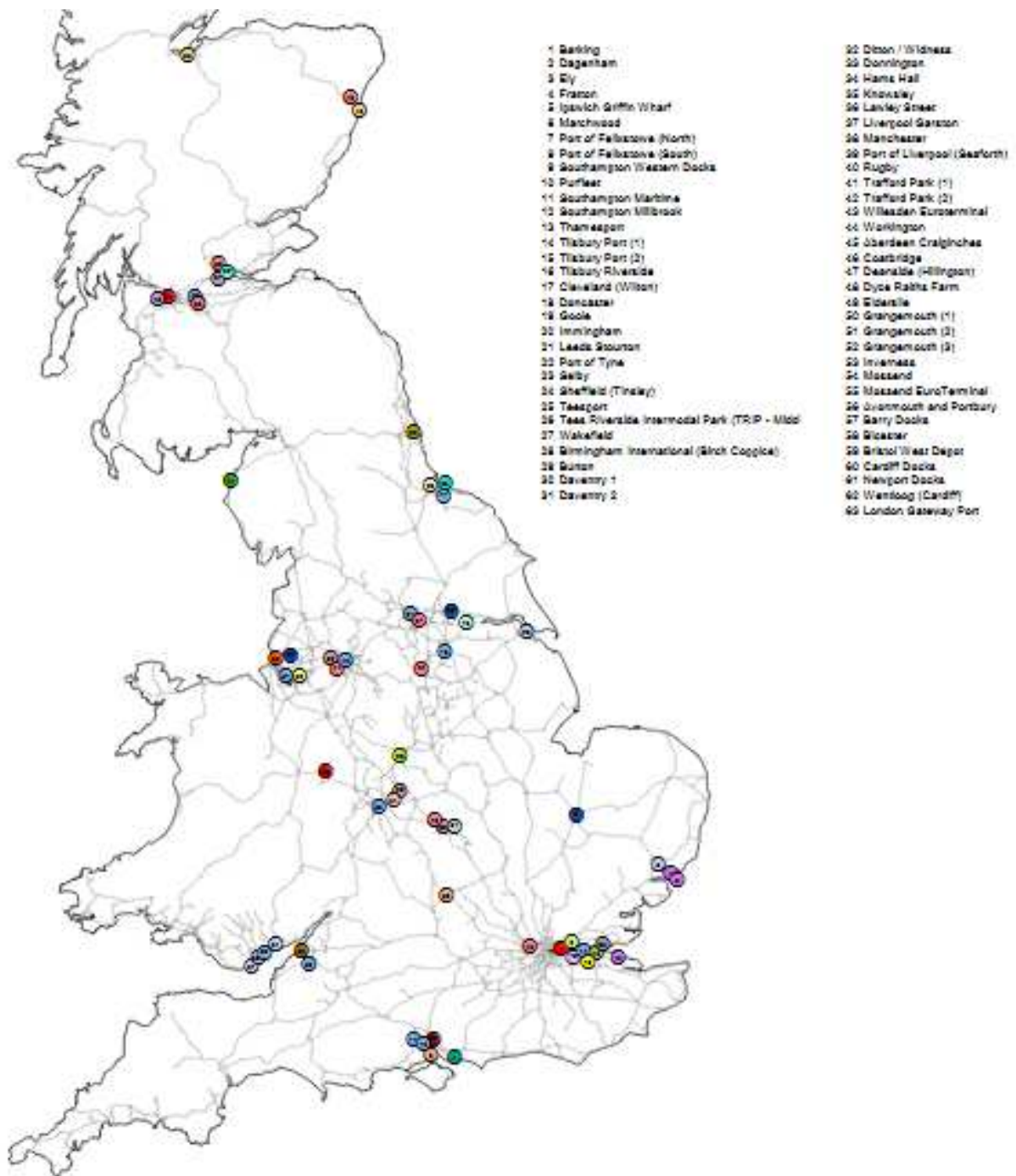


Fig: Operational Intermodal Rail Terminals: Network Rail Map 2013
(East Midlands Gateway under construction and specialist terminals such as DB Cargo Steel terminal, Wolverhampton not shown)

Strategic Rail Freight Interchange

DATA SHEET: Segro Logistics Park / East Midlands Gateway Nottinghamshire.

Location: Nottinghamshire off j24 of M1 Adjacent to East Midlands airport.

Developer Roxhill. Site owner SEGRO PLC . Currently under construction.

700 acres/ 283 ha with 50 acres SRFI. Value £66.7 million

Loss of 91 ha grade 2 and 134 ha grade 3a agricultural land.

Units between 10 thousand sq.ft and 6 million sq.ft (930sq.m to 557 418 sq.m)

Maximum height 35m. Predicted 7272 jobs.

Rail Connection: Castle Donnington Rail Line to Rugby Loop with 7km private freight connection.

Capable of up to 16 x 775m trains per day.

Major tenants: Amazon

<https://www.slp-emg.com/c/masterplan.php>

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http://www.winvic.co.uk/our_projects/east-midlands-gateway/

Planning History:

Original SRFI application to PINS in 2014 (Details still on PINS website)

Local Community and Councils objected.

PINS recommended Refusal for non-compliance with NPSNN.

Overtaken by Secretary of State, Patrick McLoughlin 12/1/2016



Strategic Rail Freight Interchange

DATA SHEET: DONCASTER IPORT

Location: Adjacent to Doncaster town. Off j3 of M18. Close to Doncaster-Sheffield airport
Developer Verdion and Ontario Pension Plan

337 acre logistics park with with 30 acre container park. £400 million.

Part colliery land, part green belt.

6 million sq.ft (557 418 sq.m) floor space

Unit sizes up to 1 million sq.ft (92 903 sq.m)

Maximum height ?. Predicted 5000 jobs.

Rail Connection: South Yorkshire Joint Freight Rail Line to Doncaster main line (Feb 2018)

W10 loading gauge. Not electrified.

Possible Doncaster Sheffield airport link

Capable of up to 6 x 775m trains per day.

Major Tenants: Amazon, Lidl

<https://www.iportrail.com/the-terminal/>

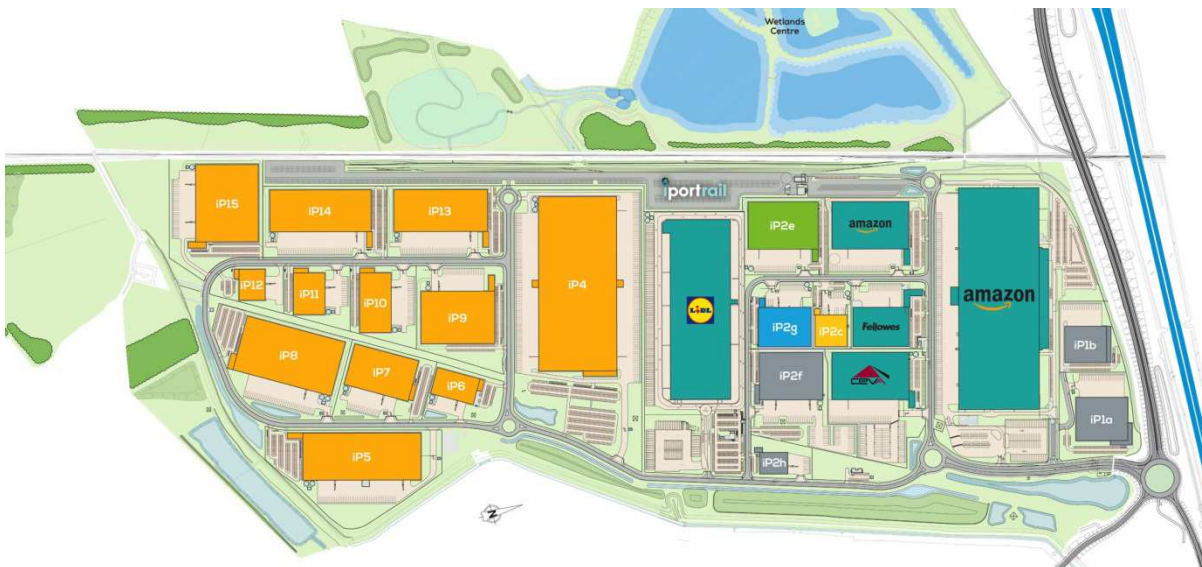
Planning History:

Originally proposed by HelioSlough/Hutchinson Ports in 2006 (see Radlett)

Helios Europe became Verdion who progressed the Planning Application.

Generally supported by Council & Community. Planning was approved by Doncaster Council and supported by 2 local MPs (Therefore not called in by Secretary of State).

Verdion costs were underwritten by Ontario Pension Plan who also share 3 German Logistic hubs.



Strategic Rail Freight Interchange

DATA SHEET: **RADLETT**, St.Albans (Approved but blocked)

Location: Former Airfield site adjacent to St.Albans town.

Developer: Helioslough (Herts County Council own the land and are proposing housing)

Rail Connection: Midland Mainline (4 track)

5 warehouses. 3000 HGV movements/day proposed.

Planning History:

Complicated history, pre 2008 Planning Act.

Via Local Authority Planning system July 2006

Community, District Council and County Council object to proposals.

http://www.strife.biz/STRIFE/Latest_news.html

St Albans DC rejects. Helioslough appeal

8/7/2010 Sec of State deems another site is more suitable (Inquiry into Appeal)

PINS rejected

Sec of State (Eric Pickles) grants Outline Planning Permission 14/6/14 citing the importance and need for a southern rail hub.

2/5/15 StAlbans DC challenge Sec of States decision to grant permission

Further Legal challenge by Helios

Currently blocked by County Council application for housing.



Strategic Rail Freight Interchange

DATA SHEET: **Daventry International Rail Freight Terminal: DIRFT**

Location: Near Crick and Rugby adjacent to M1 junction 18 and A5. Former sewage works, radio/TV transmitter site and farmland. UK's original Time signal broadcast from there until 2007

Developer: Prologis

Rail Connection: Northampton loop off the West Coast Main Line. UP to 100 trains per day when finished.

Major tenants: Asda, Ocado, Stobart

Planning History:

An evolving facility, commenced before Planning Act 2008.

Deemed a rail linked logistics park as it pre-dates SRFIs.

DIRFT 1 original planning approval 1998 has 4000 employees

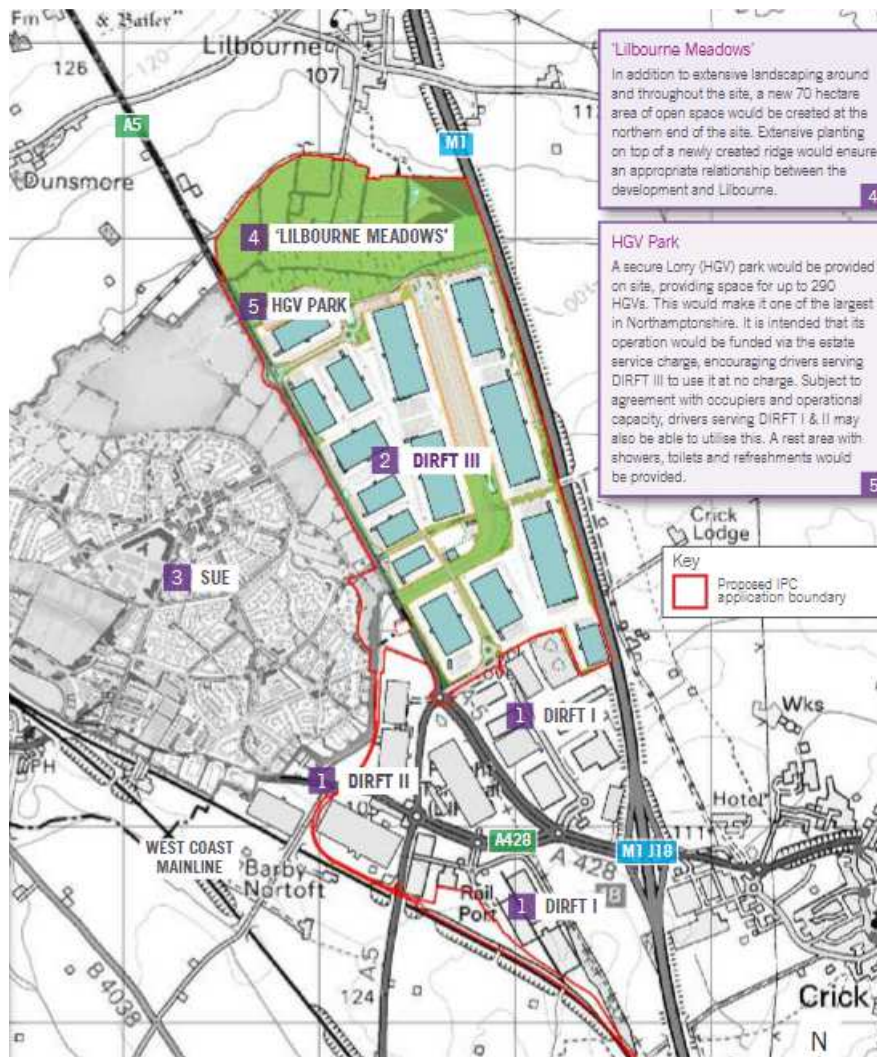
Followed by DIRFT 2 in 2005 with 2000 employees

Followed by DIRFT 3 in 2012 Under construction for 15 years. Predicted 9000 employees

Defines the Golden Triangle which is the Logistics industry's ideal location.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050001/TR050001-000516-Doc%207.1%20Summary%20of%20Proposals%20Document.pdf>

Strategic Rail Freight Interchange



DATA SHEET: **Birmingham Intermodal Freight Terminal: BIFT** / Birch Coppice / St. Modwen Park

Location: Adjacent to Tamworth off M42 j10 (8 miles from Hams Hall)

Developer IM Properties and Maritime

400 acre logistics park with 35 acre rail terminal.

Colliery land

Rail Connection: London Midland and Scotland mainline

W10 loading gauge. Up to 7 trains per day.

Major Tenants: Ocado, Euro Car Parts, DB Cargo

<http://www.birchcoppice.co.uk/about/>

Planning History:

Granted Planning Permission 2004 for Phase 1, North Warwickshire DC

2010 for Phase 2,

2013 for Phase 3.

IM Properties were accused by The Daily Telegraph of assisting their application with a large donation to the Conservative Party.

Strategic Rail Freight Interchange



DATA SHEET: **HAMS HALL, Coleshill, Birmingham**

Location: Saltley area of Birmingham. (8 miles from BIFT)

Developer: ProLogis 2002

430 acre logistics park with 11 acre rail terminal.

Former Power Station site

Rail Connection: Coleshill Parkway connection off the London Midland and Scotland mainline

Has customs clearance facility for Channel Tunnel traffic.

W10 loading gauge. Currently serving 8 trains per day.

Major Tenants: Sainsburys, BMW, DHL

<http://www.hamshallrailterminal.co.uk/Trains/>

Strategic Rail Freight Interchange

