## Planning Act 2008 – Section 88

and

The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 6

Application by Four Ashes Limited for the West Midlands Interchange Strategic Rail Freight Interchange.

Written Representations following the Preliminary Meeting by

Deadline 2

Subject of this Submission:

Economic Impact

Campaign to Protect Rural England (Staffordshire Branch)
Inspectorate reference for this representee: 20015574

#### **CPRE (Staffordshire) additional comments.**

In our initial representation we said:-

#### **Economic Impact**

We consider that there will be an impact on existing employment generating development particularly in the Black Country and Central and Southern Staffordshire

#### We object:-

 To the lack of an Impact Assessment agreed with surrounding Councils of the likelihood of attraction of existing firms to leave existing premises to relocate to Gailey or to the closure of existing SRFI\*.

With the exception of Wolverhampton City Council we are not aware that any of the numerous Unitary Authorities and District Councils (see list on next page) in the market area indicated by the application have indicated support for the application or, with the exception of South Staffordshire Council, having carried out an assessment of the implications of the application for their Authority for their authority.

We are concerned that the application will attract existing Companies to relocate into this site in the Green Belt - taking their employment with them and leaving vacant their existing premises in the surrounding urban areas; many of which are suffering deprivation and a lack of employment opportunities.

The application recognises this in Paragraph 14.285 of Chapter 14 of the application - Socio-Economics and Human Health<sup>1</sup> but does not make any estimate of the impact on employment in surrounding areas.

In the Statement of Economic Benefits<sup>2</sup> submitted as part of the application it is reported that:-

5.1.7 "Low" levels of displacement (approximately 25%) are expected to occur at regional level: (the TTWA and SSLEP). Some existing activity may be displaced but the majority of the increase in economic activity is expected to be net additional to the area. At a regional level, taking account of displacement, WMI will generate an estimated £684m of direct, indirect and induced GVA annually when fully operational.

But no indication has been given as to how the displacement has been estimated or its consequences considered.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000327-Doc%206.2%20-%20ES%20Chp%2014%20-%20Soc-Econ%20-%20Human%20Health.pdf

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000454-Doc%207.1B%20-%20Statement%20of%20Economic%20Benefits.pdf

\* From what was said on behalf of the applicants at opening of the Examination on the 27<sup>th</sup> February we accept that the proposed SRFI is intended to be additional to, and not to replace, existing SRFI.

## <u>Cities</u>

Birmingham City

Wolverhampton City

Stoke-on-Trent City

## Metropolitan Boroughs

Metropolitan Borough of Walsall

Metropolitan Borough of Sandwell

Metropolitan Borough of Dudley

#### **District Councils**

Cannock Chase (District)

Lichfield (District)

Borough of Newcastle-under-Lyme (District)

South Staffordshire (District)

Borough of Stafford (District)

Tamworth (District)

# Outside the identified area (but closer than several of the others listed above).

Telford and Wrekin (Unitary)