


From: 
To: [West Midlands Interchange](#)
Subject: TR050005 Response to Post Hearing Document by Deadline 4th April 2019
Date: 04 April 2019 15:17:00
Attachments: [image.png](#)

Project Ref TR050005 Interested Party 20014193
True site location and detrimental effect on rail passenger traffic

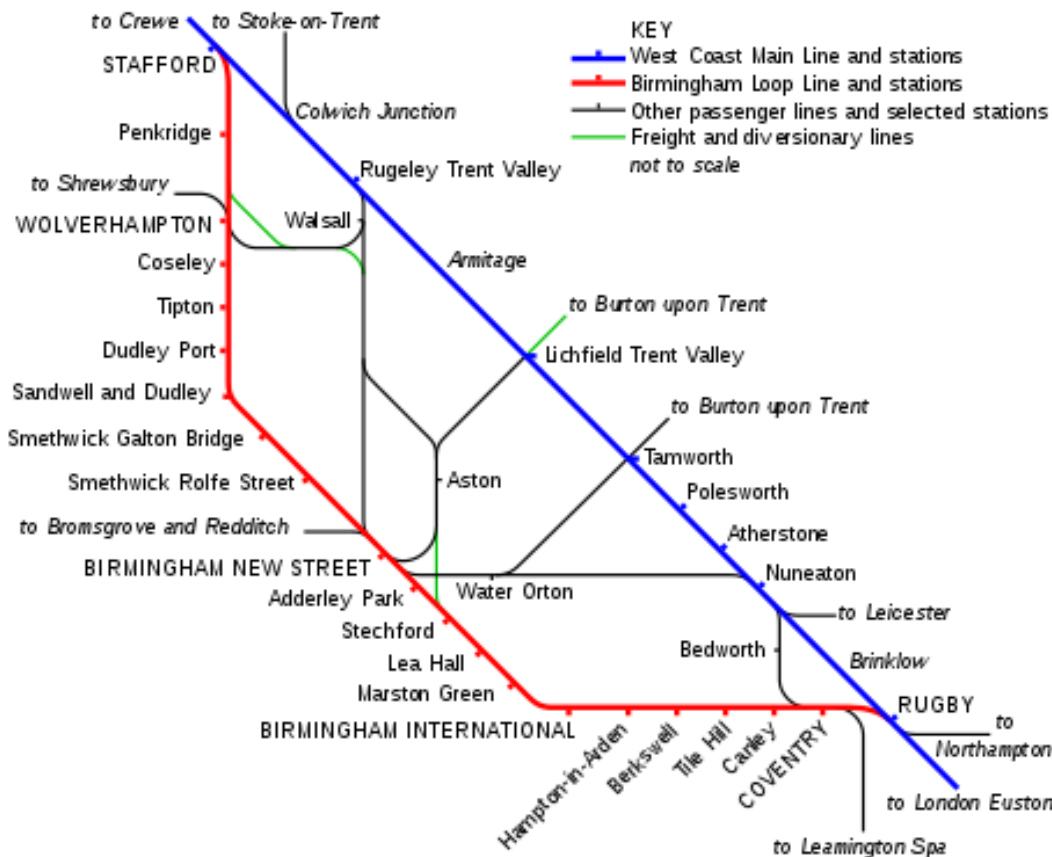
Post Hearing Response Staffordshire County Council para 1.54 makes reference to land to the West of WCML.

This description is untrue and gives a false picture of the site's actual position on the rail network. Consequently it overstates its position which has consequences for passenger traffic with further consequences for the regional strategy project Midlands Connect; Powering the Midlands Engine 2017 and its association with HS2 along this line. It is essential that the correct site position is not wrongly presented in future documents by incorrect description also used by FAL.

Four Ashes Ltd state “West Midlands Interchange will be linked directly to the West Coast Main Line, one of the country’s principal rail freight routes”. This line is illustrated in blue below. Their own truthful statement on page 3 of their June 2016 Newsletter states access to a *branch* of the WCML railway (The Birmingham Loop) shown in red. Later “branch” is omitted thus making a false promotion of the location as somewhere on the blue line which has become the description by default. Whatever the reason for that, they are experts on the railway system and planning process sufficient to know the importance of due diligence. Their knowledge was sufficient to state a preference for building along the dual track rather than the WCML multi track in their rejection of Meaford. This is not mere pedantry or semantics on a matter where any form of misunderstanding can have a major unintended consequences in decision making.

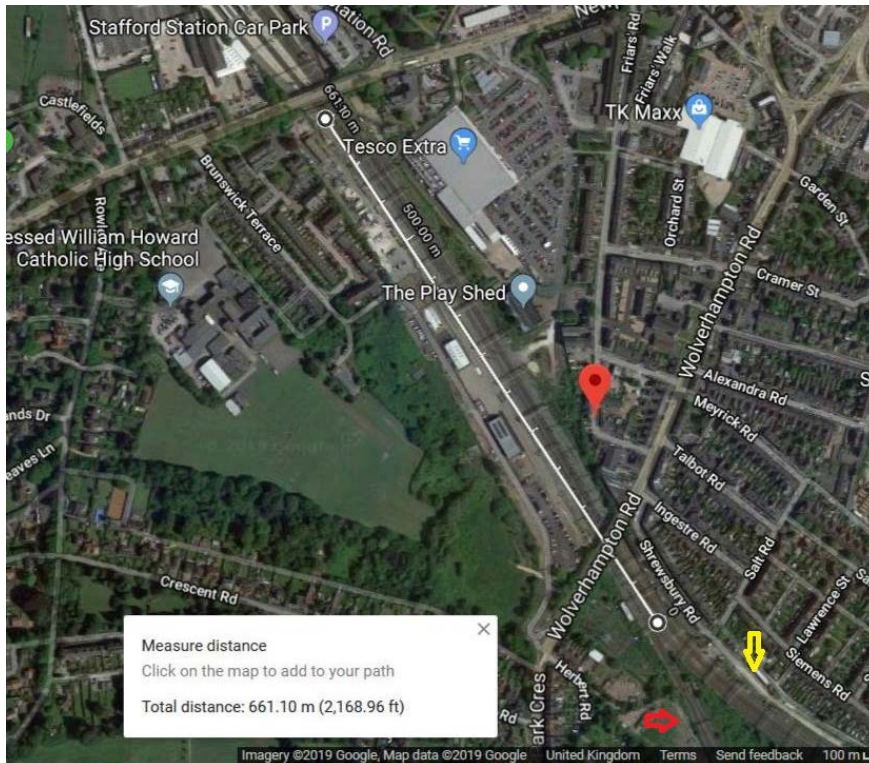
Four Ashes site is south of Penkridge on the busy passenger dual track branch separately described by Network Rail below as the [Rugby to Stafford] Birmingham Loop line illustrated in red.





It leaves the main Trent Line just north of Rugby to service West Midlands conurbation passenger loop journeys to Stafford via the marked stations. The stretch between Wolverhampton and Stafford is about 15 miles with Four Ashes roughly at the half way point and so 7 or 8 miles from the nearest main line access point to its North. Main Trent Line freight access south of Four Ashes is illustrated in green from Wolverhampton via a series of mixed and freight only tracks towards the East Midlands at least 30 miles journey in total. Thus slow freight trains to Four Ashes need to run anything up to 8 miles in either direction along the 75+ mph Wolverhampton to Stafford heavily used passenger section. There are no passing places.

Leaving the Loop travelling northwards means going onto the main WCML through Stafford Station to Crewe and vice versa to enter the Loop southbound. The satellite image below shows Stafford “single direction” merge points at the distance measure, main multi track line is near the vertical yellow arrow and the dual track Loop near the horizontal red one. Four Ashes is some eight miles distant south along that branch loop line.



In 1901 Lord Littleton had a connecting line built south of Penkrige across other parts of his land to his colliery investment at Littleton Colliery at Huntington. Apart from colliery traffic until 1993 the only evidence of any freight I know of is a former small parcels shed and coal yard north of Penkrige Station. A small tanker siding at the recently redeveloped Midland Tar Distillers site at Four Ashes saw no use after the early 1960s. Lord Littleton's permission for the railway to cross his land was conditional on a clause inserted in the 1833 Act of Parliament that two trains daily in each direction stopping [in perpetuity] at Penkrige. Station closure would breach the 1833 Act and no trains would be allowed over Littleton land. Operators and network companies attempts to make Wolverhampton to Stafford a fast non-stop stretch by closing the station have all failed on threat of invoking the 1833 clause. Beeching also failed on that hurdle. Those attempts demonstrate the importance to them of having fast uninterrupted passenger traffic along the Loop. Passenger demand has always been the dominant growth feature as numbers constantly increase. Penkrige car parking facilities and station platform extensions to accommodate longer trains have been made. Further services are timetabled from May 2019 by the new West Midlands Railways franchise. Neither the extra services nor promised potential must be frustrated by slow or obstructive freight trains.

Before closure of Littleton Colliery we suffered regular delays and missed connections due to coal trains of less frequency than 10 per day crossing or occupying the line at slow speed. The impact on our journey time was high. After the colliery closure and signal box removal, line control passed between Wolverhampton and Stafford boxes making an immediate improvement. Service increases and improved reliability are validated through increasing passenger numbers. These are a major contribution to reduction and continued discouragement of A449 and M6 car commuting. Some 100,000 are employed in commercial, IT, university, research and medical activities in Birmingham. The new 2019 HSBC centre alone employs more than 2000. Wolverhampton Station is currently being upgraded to a major passenger hub for extended Midland Metro tram services to Birmingham Snowhill with the bus station operated by several companies. This is not just for HS2 connectivity.

Wolverhampton to Stafford is rated for 75mph+ traffic with notionally 64 to 68 timetabled weekday journeys in each direction between 6 am and 10 pm i.e. about 130 journeys per day or one every 7 or 8 minutes across Four Ashes as could be seen on any weekday site

visit.

The Midlands Connect Strategy; Powering the Midlands Engine 2017 (MCS) has ambitions of 4 passenger trains per hour between Stoke on Trent and Wolverhampton (27 mins journey target) and 4 per hour from Crewe (30 mins target). These will not have taken into account of this obstruction of which they will be unaware.

The Loop is the sole critical main fast passenger line for all trains between Birmingham, Stoke on Trent, Manchester, Liverpool (the original) and major cities to Glasgow (both directions) calling at Loop stations in the track diagram. Services bypassing the West Midlands conurbation between London and Stafford via Tamworth and Rugeley Trent Valley travel along the more direct main Trent WCML.

The FAL rail representative told a group of us at Penkridge it takes 10 minutes for freight trains to decelerate and exit to the terminal sidings. Re-entry acceleration times to the slower freight optimum speed are longer but difficult to estimate. For simple calculation the site is roughly half way between Stafford and Wolverhampton for which the whole non-stop passenger timetabled journey time is 12 to 15 minutes or about 17 if stopping at Penkridge. Passenger trains take 7 or 8 minutes to reach Four Ashes at high speed at average frequency of 7 to 8 minutes. Freight exit and re-entry times are 10 minutes minimum with optimum line speeds far lower than passenger. Once a slower freight train has the line and / or points, one side or both will be fully occupied for at least as long as a passenger train takes for the whole journey. Obstruction is inevitable. Ten daily exits and 10 re-entries is in the order of 3.5 hours plus 10x2 seven mile journeys occupying the line each at say 15 minutes (5 hours) making around 8 hours daily total. To maintain that there is spare timetable capacity is fantasy especially with the possibility of conflicts with strategic scheduling expectations. Line obstruction risks 25 years of increased reliability of passenger travel to the colliery situation. Damage to the West Midlands service and commercial economy through passenger disruption will be considerable, obvious and irrecoverable. If the freight terminal makes things unattractive for passenger operator tenders and investment the damage will be far more than the claimed untested theoretical benefits of this application.

History over 180 years proves simple passenger demand has driven up numbers and investment. It always has been and needs to be a passenger numbers economic success story as long as the necessary conditions are not compromised. The site does not have direct access to the WCML as shown above. It is critical to consider the application in relation to its true site location.

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From: 
To: [West Midlands Interchange](#)
Subject: TR05005 Correction to submission
Date: 04 April 2019 15:32:18

Interested party 20014193

Please note a typing error in my submission of 15:16 today. The document paragraph reference should read 1.52

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From: 
To: [West Midlands Interchange](#)
Subject: Written submission TR050005 Deadline 4th April 2019
Date: 04 April 2019 16:50:19

Project TR050005 Interested Party 20014193 Labour Market and Jobs

Several submissions have reference to the number of jobs, the local labour market and sustainable transport to the workplace. My feeling on this topic has always been rather sceptical based on considerable expertise and experience. Although now retired I qualified in Personnel Management in the 1960s and at retirement held professional status Chartered MCIPD. I have worked for international engineering and high technology companies in the UK. I have set up labour forces in factories from scratch in development areas, centralised satellite units into existing and brand new premises, recruited and developed all grades and occupations to up management. The basic principles of labour planning remain much as they always have done i.e. location, labour pool numbers and tradition, balance of output to existing skills of intake or training lead times. All recruitment campaigns have to be run against the assurance of high ability of any in house or contracted recruitment agency. At each point of publicity, consultation or challenge the number of projected jobs on this site has risen over about three years from 6000 to 8500 making an overall increase of more than 40%. Given that such headline grabbing figures are now commonplace in planning applications and coupled with scepticism, I asked the Four Ashes Limited (FAL) representative at the Penkridge consultation how the initial figure and steeply increased figures had been calculated. A stumbled answer was that it was done by experts (unidentified) using “national guidelines” (?). Their feedback questionnaire asked for ideas on how such numbers could get to work thus reinforcing the implication that the onsite growth rate would be meteoric. The latest figure has now been updated to 8500 over 15 years on a site multi tenanted by a mixture of unknown business types with respective labour force characteristics. FAL fundamental claims can only be analysed on the nearest known labour constant in their application i.e. logistics.

Simple illustrative figures of 8500/15 yrs is 533 annually as a most ambitious recruitment baseline. The published annual turnover for logistics is 13.5% against the national average of 15% giving $533 + 13.5\% = 602$ rounded down to 600 for the first year end. Second year end base establishment figure increases to around 1150. The 533 annual establishment growth target is linear but turnover is a percentage of total employed labour force. By the time 8500 @ 13.5% loss is reached, annual turnover is in the order of 1100 so about twice as high as 533 target annual linear growth. Achievement of a stable labour force growth and retention to 8500 establishment in 15 years does not stack up. Although just a simple overall calculation based on logistics I can't see it being any different for any other business types.

Amazon employ about 20,000 across 17 huge UK fulfilment centres with about 1300 at Rugeley. Each site has an ongoing recruitment programme with Rugeley seeking an additional 2500 seasonal intake for Christmas 2018 (Express and Star 24th Oct 2018). Assuming a comparison on those figures, Amazon at Rugeley generally employ about 17% of FAL's total prediction or 40% at extreme seasonal peak. If FAL need to generally employ more than twice Amazon seasonal peak there is a wide gap between FAL planning publicity and real time operation of one of the UK's largest similar business.

On 14th and 21st March 2019 Express and Star published a job advertisement by APC Overnight at nearby Kingwood Lakeside for an unspecified number of night sorting operatives at National Minimum Rate. Included was a notice that recruitment would be weekly ongoing with immediate start in future. This broadly matches the same recruitment practice as Amazon at Rugeley. There is a constant stream of similar agency managed vacancies at Stafford postcode businesses. A sign of a depleted labour pool as demonstrated by unemployment figures.

The national unemployment figure published for February 2019 is 3.9% of working age

population. Staffordshire is at 1.3% . If firms are resorting to open ended recruitment it shows there is not a local labour pool to support the competitive recruitment gap. Vacant posts generate neither simple local economic spending power growth nor economic value added productivity contribution. Economic contribution figures headlined by FAL are entirely dependent on the successful recruitment and sustained full employment of 8500 by year fifteen on the site and are therefore equally unsafe. There are several well publicised reports of major logistics companies exploiting Artificial Intelligence (AI) and robotics to transform the industry. Ocado's Andover warehouse "self disruption" initiative is a typical example. Vero Solutions predicts that 30% of warehouse jobs beginning with the physical ones will disappear in the next few years and multiple operations will be totally automated by 2030 which is less than the 15 year FAL employment growth timeframe. The rapid growth of Amazon robotic devices following its takeover of Kiva Systems is well reported in many branches of the business press.

This will generate more high technology posts but in much lower numbers than the lower paid physical ones. This is deemed necessary for the industry to reduce high labour overheads and overcome the damaging loss and non-replacement of EU workers post Brexit: an issue highlighted by Amazon. FAL cannot have it both ways. Either low numbers of high tech posts or the reverse. Although claimed figures appear to be in respect of logistics, the site will be subdivided into rental by a variety of tenants who will have their autonomous ideas and salary levels for their own industry. In a full employment environment the site still cannot cumulatively reach the stated figure. Potential job figures are often headlined for planning applications but outcome is never audited.

Shift working employment is largely associated with car travel. A 10 mile radius from Four Ashes includes parts of Wolverhampton in the South, parts of Brownhills to the East, the southern side of Stafford in the North and the rural communities along the A5 to the West to Telford. The inner zone includes Penkridge, Brewwood, Coven, Acton Trussell and Wheaton Aston which would not yield a high number of low skilled manual workers. Four Ashes is isolated and poorly served with one bus per hour along the A449 during the day, every two hours evenings and none on Sunday. Staffordshire County Council has removed all transport subsidies on these routes and so travel is not cheap. Arriva's Wolverhampton via i54 to Stafford bus has been passed to National Express following withdrawal due to lack of numbers. There are no public transport services along Gailey section of the A5. Penkridge Railway Station is 2.5 miles away with no transport link other than the A449 bus service already mentioned passing Four Ashes. Job adverts at Four Ashes Industrial Estate nearly always include a requirement for own transport.

The wider the net is cast, the less attractive and competitive the lower paid jobs in particular become. The net then overlaps the Amazon site at Rugeley and moves towards existing warehouse work at Lichfield (Fradley). Within the Wolverhampton area public transport is subsidised and regular making working within that area far more attractive to non car owning workers. Any shuttle service will need to be over quite a distance.


The alternative is more car commuting going against Section 9 of National Planning Policy Framework Feb 2019 that planning should minimise the number and length of journeys needed for employment. Shift working outside of public transport hours exacerbates single occupancy car journeys.

Against the fears of large scale employee travel is knowing if the site could ever be staffed by high numbers of low skill low pay or low numbers of high skill high pay. Transport requirements are almost opposite to each other. If the site is to be multi tenanted with an unknown mix of labour there is no way of knowing of what the skills content would comprise. A cohesive training programme can only be successful if there is a single onsite facility or sufficient numbers of a similar requirement to set up arrangements with local educational or training establishments. No such arrangements are evident.

The claimed high numbers remain a mystery and are unachievable. The unknown proposed business mix means an unknown number. Until such facts are determined the quoted 6000 jobs rising to 8500 and the associated economic contribution are what always were and

still are – simply generic press release headline grabbers and should not be treated as real for this application until a credible figure and growth process is produced.

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From: 
To: [West Midlands Interchange](#)
Subject: TR050005 written submission for deadline 4th April 2019
Date: 04 April 2019 18:14:38

TR50005 Interested Party 20014193

This submission refers to TR050005 - 000614 para 1.54 subparagraph iii regarding the commitment to build and phasing of the rail terminal. Local doubts and concerns remain high about whether the rail terminal is merely the passport to the warehouse complex and would ever be built. The project is not part of publicly funded Midlands Connect Strategy: Powering the Midlands Engine 2017 (MCS). That strategy document make no reference or even hint to the need for any form of further logistics undertaking anywhere in the South Staffs area. Indeed its intentions for the branch railway line in question are strictly passenger based and linked to HS2 classic compatible service between Birmingham and Stafford.

MCS independently earmarks and details specific areas and sites for development with emphasis on the need to improve East West communication routes into the North Midlands, also detailed a Strategic Economic Hub. East West routes have long been the Midlands historical geographical paths to and from the European continent facing main ports.

Improvement of the A50 corridor and parallel rail between Derby on the East and Stoke on Trent to the West are priorities. HS2 passenger connectivity from Stafford is well highlighted.

MCS also identifies Hortonwood Telford about 12 miles West of Four Ashes. This houses the Telford Rail Freight Interchange. It is a development zone and operated by DB Cargo, the UK's largest and experienced of the few such operators. It is already well placed to handle the needs of the areas of Herefordshire and the Marches as well as routes to North Wales and Holyhead. This is clear existence of experienced operational rail and road freight capacity in an area claimed by FAL in their application. Not only would there be duplication but over capacity and perhaps further damage to an industry already in difficulty as revealed in business reports. On 2nd October 2018 The Shropshire Star Business Section published a report at

<https://www.shropshirestar.com/news/business/2018/10/02/profits-return-for-firm-behind-telford-rail-freight-terminal>. In order to recover from losses DBCargo have had to

restructure and make 893 staff redundant as part of further cost savings measures.

Traditional markets have gone and alternative markets are not filling the shortfall. There are problems with an increasingly overcrowded rail network and scheduling remains a continual problem. They also operate a specialist steel products interchange outside

Wolverhampton which has also been remodelled. An IBIS report of March 2018 is headlined "Losing Steam. Reduction on transportation of bulk commodities has caused

revenues to fall" Economic value is set to fall by 2023 to less than the previous ten years.

If revenue earning business is falling across the board in any industry, extra capacity has never been known to improve matters. As railway terminal developers FAL must be

aware of the freight sector's poor health and prognosis. It must be an incentive to back off railway development pace in favour of the more lucrative building rental sector. If it is

argued that early infrastructure might assist recovery such infrastructure must be within the defined MCS strategy, away from duplication and not based merely on a developers

preference for existing site ownership.

The company responses to simple questions at Penkrige about capacity and growth markets only got a vague reply about demand for bulk water and whisky from Scotland or

generic fast moving consumer goods. It was all very Mr Micawber "something will turn up". Not good enough by a long way. If the limited number of experienced rail freight

operators are in trouble they are more likely to consolidate their work into fewer locations that to take on the rental of a further one.

The terminal is to be built in a basic and an extended phase. This is more of a suggestion to only build the minimum to justify moving on to the real prize of the warehouse side. If approval is granted without an absolutely ongoing watertight means of ensuring final completion of at least the basic terminal before any work is begun on the East side of the railway local fears will be realised and the planning process circumvented. If such means are not possible then no approval should be given.

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