

From: [REDACTED]
To: West Midlands Interchange
Cc: WMIinterchange@pms.gal.gov.uk; West Midlands Interchange
Subject: West Midlands Interchange Project - TR020002
Date: 05 April 2019 15:15:55
Attachments: [Image 2.jpg](#)

Dear Sir

Further to the meetings in February this year, I wish to add to my original objections to this planning application on the following grounds

Employment

The WMI is said to create 8500 new jobs, but FAL has already said that 2500 will be construction jobs. The reality of these 2500 jobs is that the types of firms used for the build will have self employed subcontractors not new employees. These subcontractors would automatically work on other sites if they are not used here, thus the 2500 construction jobs are a myth as those jobs already exist and would not be newly generated. The remaining 6000 jobs are for the rail-freight and warehouses. The capacity of the rail freight even with its maximum allocation and the required warehouse staff to meet that capacity does not equate to 6000. One of the key players in the warehouse side seems to be the likes of Amazon. Amazon move their employees for site to site so that no new jobs would be created. Additionally they have already stated in the press that in the next 10 years their warehouses will be fully automated as will most big companies, requiring minimum staff. Given that WMI will not be completed for 15 years it is impossible to see how this number of jobs would be created as the warehouses would be fully automated by then and the jobs would not exist.

The area where the WMI is to be built has a very low unemployment level. Other areas in North Staffordshire / Stoke on Trent 25 miles away have a high level of unemployment and would welcome a rail freight hub.

Noise levels

At the recent meeting I asked John Rhodes from Quod to explain the noise level monitoring to me. One plan seems to indicate that monitoring was done on certain properties in Stable Lane, Cobweb Cottage, Elmhurst etc. I asked where the monitors had been placed as I had spoken to the property owners and they were not aware of any monitoring. He then said the monitors would have been on the footpath, but there is no footpath and no capacity to place any monitors. He asked that I email him and he would check.

He subsequently replied to my email that no monitors were put in Stable Lane and that this was only to identify property where the noise may reverberate. I find this difficult to accept as not all properties were included and yet they are equidistant from the warehouses. Are FAL being selective in their results.

I also asked about the noise monitoring results which had not been included in the planning application. I pointed out that the monitoring in August was the weekend of the V Festival which could be heard and the vibration felt up to 20 miles away on Beau Desert golf club. I asked the company doing the monitoring at the time why that weekend had been chosen given that the V Festival is widely publicised in the area. I was told that FAL had specifically asked for that period. The second set of results were in the following January and again there were roadworks locally which created more traffic and noise, yet the other dates when monitoring took place, one of which was November (N8, N9 and other sites) but these were not disclosed.

When I discussed the noise from the V Festival with John Rhodes he actually said the more noise would be better for them.

I asked for details of all the noise monitoring which has taken place including dates and sites. He has now replied to my email saying that they have added these results to an addendum which is now with S Staffs Council for their approval and that he hopes to be able to send me a copy next week. I would be grateful if you would either accept late submission of this evidence when it is available, or alternatively apply for the information yourself, as it would appear that FAL may have something to hide given that this information was not presented either at the 2nd stage consultation when the November results and January results were known but not disclosed or in the planning application. Additionally I am not sure why this information has been sent to S Staffs Council and not yourself.

Whatever the noise levels monitored they cannot accurately monitor the noise level that would be created in Stable Lane where the noise of the motorway would reverberate against the warehouses. They are only looking at the extra noise the warehouses would create with lorries etc.

Rail Freight

FAL are using the strategic rail freight to obtain planning permission for warehouses on green belt. The escape and capacity of the rail freight element of the project is not consistent with the number of warehouses applied for. Additionally there is no railway access to the majority of the warehouses so how can these realistically be used for this purpose.

There are already 8 similar strategic rail freight terminals within 35 miles of this one, so it is difficult to see why another one is needed. Surely the effect of building another site will dilute the effect of some of the others local to it. Telford already has a rail freight terminal which is virtually obsolete, the emphasis should be on making the sites already built work to full capacity rather than randomly build others. An article was written on this subject by the editor of Railway Magazine who I believe has some authority in this area. <https://www.railwaymagazine.co.uk/genuine-rail-freight-terminal-or-warehouses-with-seldom-used-sidings/> I appreciate that links may not be accepted so I have also added an extract of the text:

"The developers have been smart, and by presenting each project as a "strategic rail freight interchange" and a "nationally significant infrastructure project", they are circumventing traditional local council planning controls.

Decisions on such strategic schemes come under the remit of a department of the Government's planning inspectorate, with the final decision being made by the Secretary of State for Housing, Communities & Local Government."

"Within the Midlands are a number of unsuccessful rail terminal schemes – Telford, which is lucky to see one train a week; Prologis Park, Coventry has only seen one, maybe two trains; and at Castle Donington, Marks & Spencer has a rail-linked distribution centre which – according to Network Rail – has never seen a revenue-earning incoming freight train.

Leaving aside the matter of whether there are sufficient freight paths on the WCML to serve the sites, as all are next to motorway junctions there has to be genuine concern whether rail will actually benefit because there are no guarantees nor incentives to do so.

While the developers proclaim thousands of jobs, landscaping works, ecological mitigation, footpath and cycleway links which will be nice for the people working there, exactly what constitutes a 'strategic' element? And four 'strategic' sites within 50 miles?

I have a nagging feeling the 'rail freight' aspect attached to these projects is no more than a sop to ensure the developments get through the planning process. It's a view endorsed by a fellow railway journalist, who opined: "The railway is being abused as an Aunt Sally to garner planning acceptance and funding for developers not least because rail is environmentally sustainable. It's fundamentally wrong and indeed dishonest."

Additionally, National rail have land available along the same route for smaller rail freight terminals which they indicate are more suitable and effective than larger sites. Thus sites more suitable sites are available if the real reason is a rail freight terminal.

The land at Junction 13 on the North West side is predominately farm land with the same good rail and road links, but with less destruction and impact on the local community. In fact at the 2nd stage consultation stated that the only difference between that site and the Gailey site was the availability of land, yet no one has approached the land owners to see if it is available. I am sure if that made the same offer to them as they have to the Heath Farm owners they would have been happy to accept. This would result in the WMI being closer to the area of higher unemployment and mean less compulsory purchase of property and disruption on the community.

At the meeting it was asked if a separate exit could be made for the WMI off the M6 but this was not possible. However, between Junction 13 and 14 an exit (works entrance) already exists. There are exits North and South Bound and I believe the bridge is already reinforced. Given that compulsory purchase is possible with a Nationally Strategic project there should be no problem acquiring a right of access. The same railway line runs to the East of this land on the North bound exit and the whole area is agricultural land without the need to demolish property. This would also reduce the impact on motorway traffic as the lorries going to the freight terminal would have their own designated exit.



I trust that these views will be taken into account when reaching your final decision.

I am happy to present any further details or evidence required relating to the above objections, either to yourself or at any future open floor meetings.

Kind regards
Sue Worrall

Sent from my iPad