

TR050005 – The Proposed West Midlands Rail-Freight Interchange – Devolvement Consent Order (Deadline 2) Feedback

Introduction

The purpose of this document is to express the concerns that my family and many of our neighbours have about the proposed West Midland Rail Freight Interchange (WMI) at Four Ashes/Gailey, South Staffordshire. We live alongside the A449 in the village of Standeford (Coven), 1km to the south west of the proposed WMI site.

Section 1: This section covers our concerns regarding the planning justification being used to develop the proposed WMI site. It poses a number of unanswered questions about the need for proposed scheme.

Section 2: This section covers our concerns about the potential impact of the development on the communities that reside to the south of the site. The location specific issues we identify are applicable to many other settlements and roads north, east and west of proposed WMI site.

Section 3: In this section we recommend a number of possible mitigating measures that could help limit the effects and impacts of the issues identified in section 2.

Section 1: The Planning Justification & Purpose of the West Midland Rail Freight Interchange

One of the principal concerns that we have about the proposed scheme is the possibility that a large portion of the activity at the proposed WMI would end up being solely road-centric freight/logistic operations.

Many businesses would pay a premium to be able to locate themselves on this site as it sits directly at the centre of the UK's strategic road network, irrespective of a whether a rail connection to the West Coast Mainline exists or not. To help allay our concerns we have on multiple occasions asked the developers (and the Planning Inspectorate¹) the following questions. If the developers could provide unambiguous answers to these questions this would allow us to better understand the risks, benefits and planning rationale for the proposed scheme.

1. In percentage terms what will the proposed rail infrastructure cost to construct, relative to the market value of the finished B8 warehousing?

2. What are those percentage values in monetary terms?

¹ The Stages 2 and 2A Consultations.

3. Chapter 15 of the submitted Environmental Statement (ES)², the other submitted transport documentation³ and documentation published in the preceding consultations make frequent and repeated comparisons between the proposed WMI and the Daventry SRFI (DSRFI) – hypothetically, if the DSRFI were to have its rail links/connectivity removed, what percentage of its activity could continue unaffected? In other words what economic activity goes on there that is not rail dependent?

During a presentation at the Coven Memorial Hall on the 22nd of July 2017 we were told by a Copper Consultancy Ltd. planning consultant acting on behalf of Four Ashes Ltd. that questions 1 and 2 could not be publicly disclosed. We were however given an answer to question 3 – the Copper Consultant stated that only 30% of the Daventry SRFI's operation is partially or completely rail dependant.

4. For the avoidance of doubt could the Inspectorate ask the developers to confirm in writing the DRIFT site's 30% rail dependence figure?

5. Could the developers also clarify what percentage of warehouse (Class B8) rail dependency they would like to attain at the proposed WMI in order to be able to deem its creation a successful and effective use of 650 acres of Greenbelt?

It is quite striking that the developers are to date unable or unwilling to publicly state which companies will be using the proposed B8 warehouse facilities. In the extensive suite of documentation submitted in the DCO application and during the preceding statutory and non-statutory consultations, not one distribution company has been cited or invoked as an interested partner company. This ambiguity strengthens the suspicion many people have that the veil of a 'green' SRFI is hiding some B8 warehouse construction for non-rail entities.

6. What possible reason could there be not to make information about interested/partner distribution companies public?

7. Is the reluctance to make this public due to the partner companies having very limited or no rail dependency in their current/future business operations?

8. What business/businesses would not want to advertise their intent and ability to expand, invest and create thousands of new jobs? That is not information companies usually like to withhold from their competitors, customers or investors.

9. If the developers are genuinely aspiring to create a rail-freight hub and the market lead approach of 'if we build it, they'll come' fails to generate sufficient uptake by rail dependant businesses, will the reserve option of 'standard' road-road based logistic operations fill the vacant warehouse units?

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000328-Doc%206.2%20-%20ES%20Chp%2015%20-%20Transport.pdf>

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000412-Doc%206.2%20ES%20Trans%20App%2015.1%20-%20Transport%20Ass.pdf>

10. Can the Inspectorate 'condition' any future approval so that each parcel of land/warehouse within the designated red site line is built on a case by case basis, with a site specific 'reserved matters' type application to validate each warehouse's rail dependency?

If the WMI is approved and does go on to function with 'extensive' rail based operations, its ability to act as a catalyst for further development is also deeply concerning. The expansion of secondary and tertiary developments around SRFIs is not a farfetched possibility. Many SRFI's across the UK have seen this happen in their hinterlands. A stark example of this is the SRFI at Daventry near Rugby⁴.

11. What safeguards are there to ensure this will not happen in the Greenbelt around the proposed WMI site?

Section 2: The WMI and its Connection to the West Midlands Conurbation along the A449

It is advocated by the developers that the proposed WMI will primarily serve the 'Black Country', South Staffordshire and eastern Shropshire (Source: *The Transport Assessment - Tables 24, 25 & 26*⁵) - these areas reside to the south and southeast of the proposed WMI site. To connect with those areas the proposed WMI would be completely dependent upon the road link provided by the A449 between the proposed Station Road roundabout in the south west corner of the WMI site and Junction Two (J2) of the M54. The A449 will not become an ancillary road associated with the proposed scheme – it will become the WMI's de facto spinal cord.

The developers' submission recognises the A449 (between the WMI and J2 of the M54) has considerable 'capacity' to support a large increase in vehicle numbers; it is not disputed that the road has capacity. The issue with the developers' proposal is that it completely misrepresents a number of very specific and profound impacts that the intensification of use along the A449 will have on many of the residents living in the villages of Standeford, Coven & Coven Heath to the south of the site. The 'southern settlements' intersected by the A449 are home to many hundreds of people (please see Photographs 1, 2 and 3 and Map 1 to see the locations and nature of these settlements). The southern settlements are also situated on or adjacent to the majority of the junctions that intersect the A449 between the site and J2 of the M54. These again can be seen in Photographs 1, 2 and 3.

The developers' traffic modelling submitted in Chapter 15 of the submitted ES⁶ (Table 15.1) anticipates that in the event of an approval by the year 2021 an additional 1569 (154% increase) HGVs would be using 'Link 18' (the A449 between Station Road and Brewood Road) per day. The modelling also

⁴ https://en.wikipedia.org/wiki/Daventry_International_Rail_Freight_Terminal?wprov=sfsi1

⁵ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000412-Doc%206.2%20ES%20Trans%20App%2015.1%20-%20Transport%20Ass.pdf>

⁶ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000328-Doc%206.2%20-%20ES%20Chp%2015%20-%20Transport.pdf>

estimates an additional 5509 other vehicles also using 'Link 18' as consequence of the proposed scheme.

Large increases in vehicle numbers are also anticipated on 'Link 20' further south along the A449 (the A449 between J2 of the M54 and the Brewood Road), although they are slightly smaller in number compared to the proposed usage in 'Link 18'. By calculating the differences between the estimated numbers of vehicles using 'link 18' and 'link 20' the developers anticipate that an average of 2183 additional vehicles per day (145 of which will be HGVs) will be filtering onto and off of the A449 at the School Lane and Brewood Road junctions. These intersecting roads are narrow, residential streets totally unsuited to serve as 'rat-runs' for an additional 145 HGVs and 2000 car/van movements per day.

The effect of the large increases in vehicle movements along the A449 and intersecting roads would be highly disruptive for the occupants of the many older 2-3 storey dwellings that front the affected highways, particularly those dwellings with principal elevations fronting the various junctions along the A449. The pre-WWI dwellings that line the A449 are vulnerable as they are typically constructed with sub 300mm foundations/footings; have extensive/elevated first floor window fenestrations and are constructed without wall cavities, effective insulation, modern engineered bricks/blocks, efficient insulating window/door materials and adequate boundary treatments. Collectively, these characteristics result in homes ill-suited to mitigating the effects of an intensification in the frequency of highway generated noise.

Chapter 13 (Noise & Vibration) of the ES⁷, paragraphs 13.329 – 13.359, has analysed the projected changes in sound levels provided in Technical Appendix 13.5⁸ (Operational Noise Assessment Information). The analysis given in paragraphs 13.329 – 13.359 has sought to confirm acceptable sound level increases to long sections of road (several kilometres in length) around the WMI; critically this approach has failed to take account of and represent the effect of signal controlled junctions along the A449. Instead, the increased levels of sound in these locations has been smeared out into the data and hidden.

Signal controlled junctions amplify the frequency and intensity of the most disruptive sounds, such as harsh braking, engine revving, rapid acceleration, blaring radios and refrigeration cooling units being activated on HGVs when cab/engines are stationary at a red traffic lights. Around junctions these types of noise sources are sporadic and intermittent bursts of sound, particularly at night, which could be problematic for the occupants of vulnerable older houses. For example, the constant drone of several passing cars may produce the same average amount of sound as a fully laden HGV slamming its brakes on at a traffic light change. However, the passing cars would not wake a sleeping child, whereas a harshly braking HGV could.

ES Chapter 13 - Paragraph 13.418 best summarises the developers' position on the matter:

⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000326-Doc%206.2%20-%20ES%20Chp%2013%20-%20Noise%20and%20Vib.pdf>

⁸ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000404-Doc%206.2%20ES%20Noise%20App%2013.5%20-%20Op%20Ass.pdf>

Mitigating off-site road traffic noise is not generally possible as the land is not within the control of the Applicant; the erection of roadside noise barriers could require the purchase of land considerably beyond the Order limits. The use of low noise road surfaces can be effective for free-flowing traffic conditions, however, the traffic movements that lead to the moderate adverse effect are close to junctions, where traffic is unlikely to be free-flowing. Low noise road surfaces are unlikely to provide a material benefit.

ES Chapter 13 has not only statistically misrepresented the impact of an intensification of vehicular use, it has also very cynically asserted that the Noise Insulation Regulations 1975 (as amended 1988) will render the developers devoid of any responsibility for highway generated noise beyond a distance of 300 metres from the site.

Given the lucrative nature of a WMI approval - the developers and the landowner would have more than sufficient financial means to help mitigate (through the Section 106 agreement) the very specific adverse effects we have identified. The developers' initial approach of collating dubious evidence, using statistical skulduggery to make it fit their narrative and then hiding behind 44 year old sound legislation is unfair, immoral, and completely counterproductive to the wider public good this scheme could deliver. Mitigating the impacts of the proposed scheme is unlikely to be problematic if the examining body determines the application with an approval. The assertion that the developers need to take ownership of land and property to install mitigating engineering solutions is nonsense. Affected residents can be given a choice to install or not install engineering solutions to mitigate against the problems. If the engineering solutions need to reside on land owned by Highways England alongside the A499, this could and should to be assessed on a case-by-case basis with the Inspectorate arbitrating the process.

The impact of the proposed scheme on air quality in the southern settlements is also completely noticeable in its absence from the submitted application. The issue appears to have been missed in the EIA scoping given to the developers some years ago. The matter should be fully and robustly examined prior to any consent being granted.

Section 3: Mitigation Measures to Protect the Communities Living Along the Southern Corridor

The proposed WMI would generate substantial profits for the developers and the landowner if it is given consent. It is not fair, nor is it morally right, for that to happen to the detriment of local people without adequate redress for the impact it will have.

It is quite clear that those most severely affected, such as those whose homes will be demolished, will be given substantial financial compensation. However, those affected residents further down the impact spectrum also need adequate redress. This includes the residents affected by the changes in the traffic regimes along the A449.

The following is a list that is by no means exhaustive, of what could be done to limit the impact of the issues identified in the previous section of this document.

- Integrate and phase Highways England's proposed M54 (Junction 1) - M6 link road into the WMI scheme⁹. Given the scale of both schemes and their close proximity, failure to develop the schemes holistically would be a missed opportunity to develop the most efficient and integrated transport network in the West Midlands region for decades to come. It is possible that the creation of a new M54-M6 link road at J1 of the M54 would allow the A449 to be used differently from its proposed role (advocated by the developers of the WMI scheme) as a high-volume, high-speed WMI access and M54-M6 motorway link road. A successfully built new M54 (J1) M6 link road would enable the A449 to move toward becoming a high-volume, low-speed WMI service road, open only to local traffic and WMI-West Midlands HGV movements.
- Create a new junction on the A449 between the Standeford and Brewood Road Junctions. Please see Map 2 for where this may be possible and how it would link to the existing local road network. A new junction would remedy many of the problems identified in Section 2 of this document. A new A449 junction would enable the existing Standeford and Brewood Road junctions to be terminated. This would allow the A449 to pass through the three urban settlements unimpeded. This would increase average vehicle transit times through the settlements, thus reducing the levels of vehicle derived air pollution that would be emitted in these areas and therefore the levels people are exposed to.
- Terminate the existing intersecting A449 junctions to enable a change in the layout of the A449 from a two lane dual carriageway to a single lane road where it passes through the built up areas. This would enable sections of sound proof fencing, such as those shown in Photograph 4, to be installed alongside the roadside in strategically placed sections, essentially insulating the settlements from the increase in sound along the A449. Stretches of single lanes along the A449 would move HGVs away from many house frontages and lessen the severity of the vibration they generate.
- Remove large sections of existing tarmac on the 'outside' of this new fencing to enable the formation of a tree lined 'green corridor' to soften the brutal appearance of the fencing within the Greenbelt landscape.
- Reduce the speed limit from 60 mph to 40 mph on the A449 where the road passes through sensitive areas to reduce noise, vibration and pollution levels. A change from two to one lanes, with a reduction in the overall vehicle speed limit has been undertaken by Worcestershire County Council on several stretches of the A449 between Kidderminster and Worcester in recent years (see Photographs 5 and 6). The road modifications there have reduced noise and vibration levels and improved road safety where a large truck road passes through small rural communities. Transferring the approach to the A449 to the south of the proposed WMI would be a sensible measure.

⁹ <https://highwaysengland.citizenspace.com/he/m54-to-m6-m6-toll-link-road/results/preferred-route-announcement.pdf>

- Enforce new speed limits with strategically place fixed speed cameras or average speed cameras. It is noted (in Paragraph 7.5 of Appendix I - The Site Wide HGV Management Plan¹⁰) that the developers wish to use such an approach in the town of Penkridge to the north of the proposed WMI in order to restrict HGV transit through that settlement.
- Fund the upgrade of windows, doors and the boundary structures of older properties with 'modern' and more robust/efficient materials.

¹⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000421-ES%20TR%20App%2015.1%20-%20TA%20App%20I%20-%20Site%20Wide%20HGV%20Man%20Plan.pdf>

Photographs:



Photograph 1: Coven Heath.



Photograph 2: Coven and the Brewwood Road Junction.



Photograph 3: Standeford (Coven).



Photograph 4: An example of sound proof fencing.

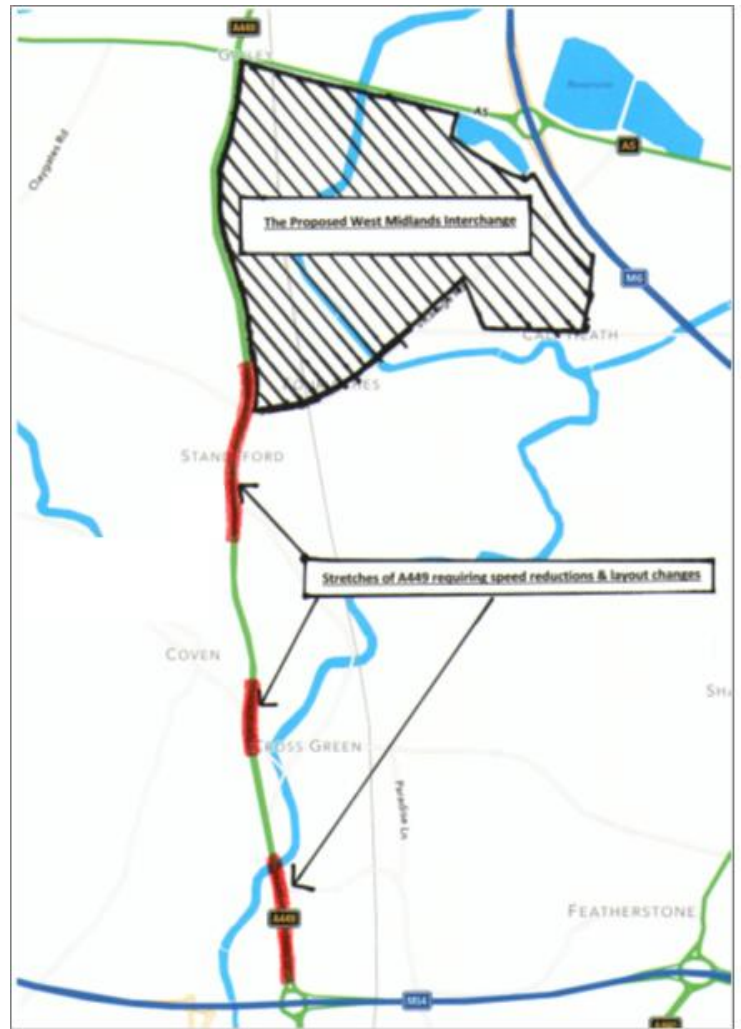


Photograph 5: The image shows a section of the A449 at Ombersley, Worcestershire (looking south). The dual carriageway has been reduced to one lane by Worcestershire County Council.

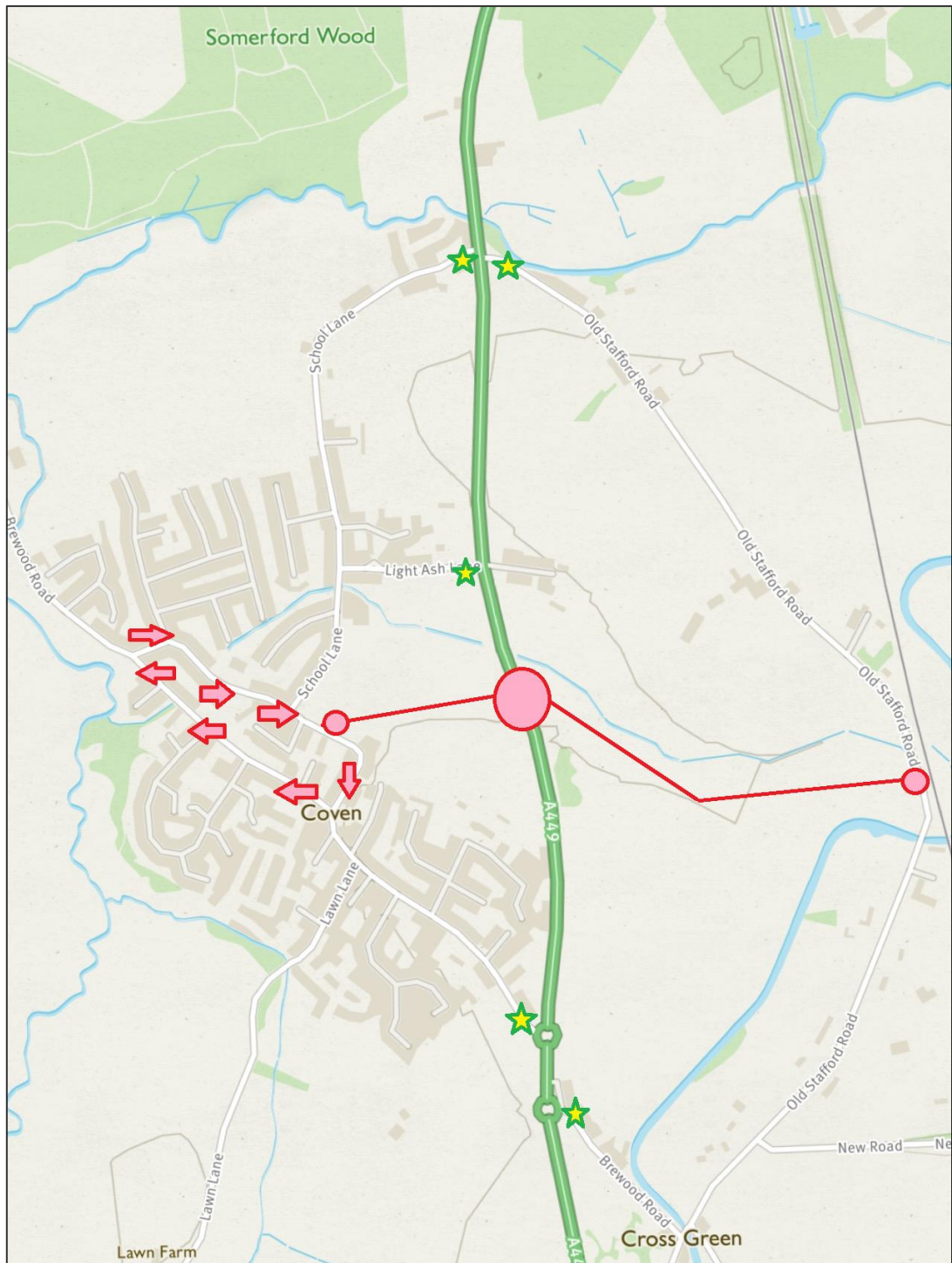


Photograph 6: The image shows a section of the A449 at Ombersley, Worcestershire (looking north). It has had its speed limit lowered and the road has been reduced in size from two lanes to one by Worcestershire County Council.

Maps



Map 1: The map shows the A449 between the A5 and M54. Areas along that stretch of road with concentrated clusters of housing, businesses, pedestrian crossings and small junctions that would benefit from a reduction in the speed limit are shown in red.



Map 2: The map shows the location along the A449 between the School Lane and Brewwood Road junctions where a new roundabout could be created. Positioning a single multipurpose junction here would help transfer the increased levels of exhaust emissions and noise pollution away from almost all of the sensitive residential areas in Coven and Standford. The red circle and red lines show the possible location of a new roundabout and connecting roads. The red arrows show a possible one way system in the village of Coven to allow local buses to turn. The green and yellow stars show the intersecting junctions along the A449 which could be removed.