

Deadline 3 - 24th April 2019

Stop The West Midlands Interchange – Responses to ExA questions and Deadline 2 Submissions.

1. Ref: Campaign For Better Transport (Freight on Rail) Submission dated 20th March 2019 – Response.

Para 2 of their submission “*Increasing rail freight volumes is part of the Government’s strategy to reduce CO2 and air pollution emissions, road congestion and road collisions. In order to increase rail freight, interchanges such as Four Ashes, are needed at strategic locations with good road and rail connections, across the UK.*”

The Inspector’s attention is drawn to our submission Ref: Stop The West Midlands Interchange – Road Report

Freight on Rail’s submission fails to recognise the geography of the local area and the facts derived from the Applicant’s projects travel assessment namely that once fully operating there will be in the region of 6,000 cars or vans, mainly employees, entering and leaving the site over 24 hours, equating to 12,000 journeys a day.

There will also be more than 3,000 lorries going to and from the site each day – equal to 6,318 journeys over 24 hours. It amounts to a lorry entering or leaving the site every 15 seconds on average at peak or 260 journeys an hour.

The traffic flows contained in the Freight on Rail’s illustrative diagram make no distinction between HGVs and cars in the numbers. It is only in the Applicant’s Draft Environmental Statement that we see the full picture.

| Road | 2021 total vehicles no devpt | 2021 total vehicles + devpt | % Change | 2021 HGVs no devpt | 2021 HGVs with devpt | Change |
|------------------------------------|------------------------------|-----------------------------|----------|--------------------|----------------------|---------|
| M6 J13- J14 | 154,703 | 156,209 | 0.97% | 26,692 | 28,035 | 5.03% |
| A449 J13 – Pinfold Lane | 16,172 | 18,168 | 12.34% | 1,200 | 1,845 | 53.8% |
| A5 between J12 & site access | 21,260 | 31,601 | 48.64% | 1,358 | 5,358 | 294.63% |
| A5 between A449 and A41 | 19,918 | 21,307 | 6.97% | 944 | 1,433 | 51.8% |
| A5 between A449 and Gravelly Way | 22,306 | 22,541 | 1.05% | 841 | 2,178 | 158.87% |
| A449 between M54 J2 and Brewood Rd | 27,678 | 32,693 | 18.12% | 1,024 | 2,703 | 164.05% |

These figures show that, while the increase in total numbers of vehicles may be modest on some sections of the network, the increase in the number of HGV’s will be very substantial. In all the cases mentioned above except the first, the number of HGV’s will increase by at least 50% over current numbers and in some cases it will be 100-250%.

Even on the M6, it is expected that the development will result in a 5% increase in HGV traffic between Junctions 13 and 14. For a road, which is one of the busiest in Europe already, that is a substantial rise.

2. In the Detailed notes on page 3 Freight on Rail make the following point:

“Figures on HGV involvement rates in critical incidents on the SRN make the economic and safety case for rail freight.

For example the average monthly figures for critical incidents on the Strategic Road Network Jan-Nov last year show the following:

Incidents of more than 5 hours HGV involvement rate is 42.8 per cent of incidents of more than 10 hours is 55.72 per cent even though HGVs make up just under 12 per cent of motorway traffic miles in 2017. “

Whilst the general proposition is correct it is the fact that according to the Applicant’s figures above, HGV movements will not be reduced for WMI.

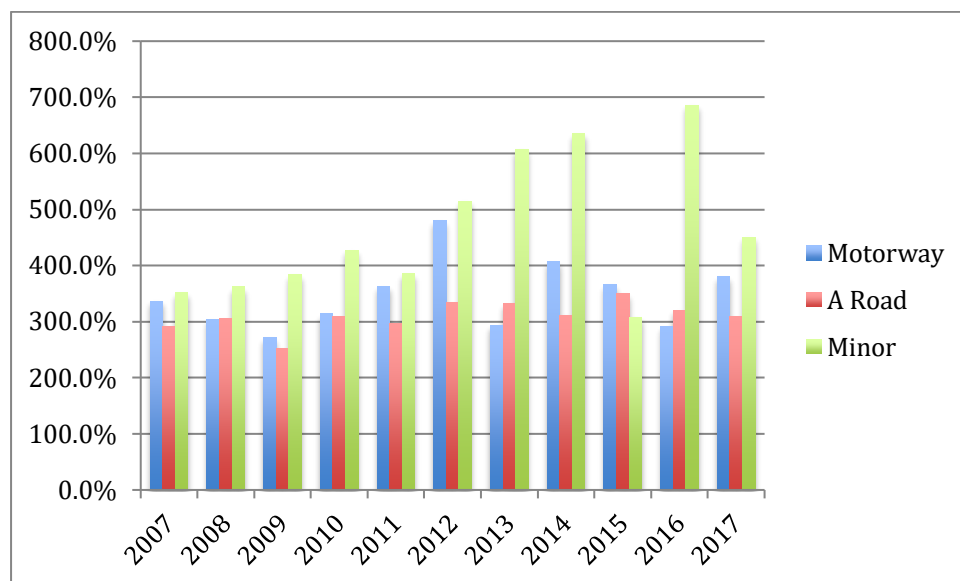
3. In the Detailed Notes on page 4 Freight on Rail also make the following point:

“The latest DfT valuation of the benefits of prevention of road accidents puts the costs per fatality at over £1m Planning Inspector.

HGVs were almost five times more likely than cars to be involved in fatal accidents on minor roads in 2017.

Source: Traffic statistics table [TRA0104](#), Accident statistics Table [RAS 30017](#), both DfT”

This graph on page 5 of the Detailed Notes (produced below) shows HGV involvement rate in fatal crashes on different road types over the past 11 years.”



The Applicant’s figures above therefore point to a greater risk of HGV accidents consequent on the development not a reduction.

4. Freight on Rail suggest that “Scarcity of suitable sites justifies use of green belt in very special circumstances for Four Ashes” and under “Mitigation Measures” refer to “the amount of green space across the site was further increased from 33% to 36%”

The proposal would actually involve the loss of nearly 700 acres of green belt land and the accentuated loss of openness by the construction of warehouses 30m in height.

Our other submissions make it clear that there are better sites available with a significantly reduced loss of either green belt or open land.

5. We also draw attention to our *Stop The West Midlands Interchange – Health Impact Report*

The proposed development will increase air pollution and based upon CO2 figures given in parliament the 6,300 HGV's will approximately produce 132 tonnes of carbon emissions every day. (For a modern HGV is around 820g of CO2 per km at 40mph = 0.82kg, Therefore 6300 HGVs a day x 0.820 x 26kms (average distance of local trips) = 132184 kg of CO2 or 132 tons per day. That is ignoring 14,000 car trips, which is about 54 tons). This is contrary to UK Government Policy.

6. Freight on Rail on page 1 of their Submission quote:

“Building more roads alone will not solve the problems as it creates new traffic, because when a new road is built, new traffic will divert onto it, a well-known and long-established effect ‘induced traffic’

Response

This statement in their submission cancels out then, the implied benefits of the newly proposed island and link road to the site especially given the above figures in 1 above..

7. **South Staffordshire District Council**

FAL are proposing a HGV ban on HGV movements on the A449 through Penkridge. It is critical that the HGV ban is secured robustly and is enforceable to prevent HGV journeys routing through Penkridge when the motorway is open but running slowly.

Response

This is correct but it is not adequate to address all such problems. In our submission an HGV ban needs to be enforced on the A5 West of Gailey and enforced to stop HGV's rat running to the A41 or to Telford and to force them to use the M54.

8. **Highways England**

Document 8.6

Statement of Common Ground The West Midlands Rail Freight Interchange Order 201X- Highways England Four Ashes Limited – 4th April 2019

3.2.10 page 12 - It is agreed that the level of timings of events at Weston Park do not require further analysis or sensitivity testing given that they are largely outside of peak travel times at weekends. Any events at Weston Park of sufficient scale to require traffic management on the SRN is subject to bespoke traffic management plan.

Response

The proposed development will be a 24/7 operation and therefore in our view this part of the A5 and events at Weston Park will need further analysis and sensitivity testing. In any event there is email evidence that this section of the A5 is used as a short cut to the M6 for HGV's travelling to and from Telford on a daily basis and should this development go ahead traffic volume will not stop at weekends.

9. Page 13 – Highway Strategy and Mitigation

4.1.1 –

- Altering Crateford Lane at the new A449 roundabout to one way eastbound.
- Implementing a right turn ban at the existing A449/Station Drive traffic signal junction for all A449 northbound traffic.
- Relocation of two laybys from the A5 to A449
- Amendment to south bound bus bay on A449
- Relocation of north bound A449 bus bay to the south of junction with Gravelly Way.

Response

We would like to seek clarification as to whether the residents in Station Drive & Crateford Lane have been consulted on these plans.

We would also wish to view the plans for the above amendments before any final comment could be made.

Further there is concern about the addition and location of proposed pedestrian crossings on the A449/A5 link road and the southern arm of the proposed A449 roundabout and the impact this will have on the traffic queues and congestion that will result as a consequence of this development especially given that the HGV and the site wide travel plan has not yet been disclosed.

10. 5.1.7 It has been agreed that the A5/A449 Link Road must be constructed and available for use by no later than 5 years after the occupation of more than 46,000 sqm floor space or prior to the occupation of more than 186,000 sqm of the rail served warehousing whichever is sooner.

Response

We would request that this timescale is vastly reduced as this feels like there is just a high level time scale estimate being made and if not, then what other routeing agreements/advisory freight routes will be put in place?

11. Matters Yet to Be Agreed

5.5.2 Chapter 13 of Environmental Statement in regard to Noise and Vibration.

Response

Not only will there be vibration from development traffic, there will be vibration from HGV traffic travelling to and from the site thereafter and this will extend along the A5 East and West from Gailey and the A449. We enquire what measures will be implemented that fully mitigate any and all environmental impacts arising from and relating to interactions between the development and the SRN, whether Highways or County Council be responsible? These points should be clarified so informed comment can be made.

12. We are concerned that several documents have been submitted late by the Applicant well outside of the stated timetable. Evershed Sutherland's response to the Inspectors questions (which is dated as revised 26 March) was submitted late on

Thursday 18th April, ie. one working day before the deadline date for the following submission. We would like the opportunity to respond to those documents in a reasonable time frame.

13. Evershed Sutherland's Statement of Common Ground with Canal & Rivers Trust
Due to their lateness, it has not been possible to review those documents properly and prepare a full response. In particular, there seems some disparity between the SoG and the Canal & River Trusts submission. We would like the opportunity to respond to those documents in a reasonable time frame.
14. Amongst the Deadline 2 responses we note that land owner, Inglewood Investment, has submitted a detailed report & costing for the WMI proposal. Whereas the report is very detailed, its purpose is quite revealing in that it argues that the project area is unnecessarily large and objects to compulsory purchase of their land (within DCO) but that they would really like to develop the land themselves for B8 warehouse use and hence enjoy the corresponding land value uplift. We also note that Inglewood's also hold nearby land on the A5 and have prepared a development scheme.
15. New documents published.
The Inspector was previously directed to the National Infrastructure Commission: Future of Freight Interim Report Jan 2019 from our Wrong Location report. The Final Report has just been published (April 2019) and is therefore one of the most up-to-date freight studies and the Inspector is directed to it here:
https://www.nic.org.uk/wp-content/uploads/Future-of-Freight_Future-of-Freight-Demand_MDS-Transmodal.pdf
In particular, several future scenarios show a downward trend to freight (as described in our Wrong Location report). This should also be considered in the light of current climate related actions taking place in London and Edinburgh, which showcases public interest in the environment rather than just in money and next day deliveries. In the process of composing the final report the National Infrastructure Commission drew upon requested evidence from Interested Parties which has been published :
<https://www.nic.org.uk/wp-content/uploads/CfE-with-cover-and-contents.pdf>
It provides a wealth of diverse background information and partisan responses: All developers involved in developing SRFIs (Segro, Gazeley, Ashfield, IM, Freightliner, Kilbride) have responded explaining how essential they are (it is noted that WMI & their component partner Kilbride Rail sent in separate reports promoting their membership of the Rail Freight Group). Road Transport Groups spell out improvements to the network that they feel would improve the system.
The RAC provides a comprehensive report detailing improvements to road freight. Several Property companies ensue the importance of Big Boxes and the shortage of them (irrespective of transport options). Several suggest radical last mile solutions with electric tricycles and drones.
The Campaign for Better Transport has a long response
Several County Councils and The Marches (not Staffordshire) report their recommendations.
Midlands Connect has a long response and concludes that a weight distance taxation regime is required, that better load utilisation is required rather than going for the largest vehicles. Also that modern manufacturing and 3D printing may radically change (reduce) freight demands. Importantly it directs readers to another report which the Inspector is recommended to read:
<https://bettertransport.org.uk/sites/default/files/pdfs/Tracks-Carbon-Reduction-Report-2017.pdf>

The Commercial Boat Operators Association; recommends that waterways should be utilised more to alleviate road congestion. There is considerable discussion about the 'last mile' delivery concept. This is recommended for last mile delivery in cities such as London and Birmingham which have extensive networks.

The Centre for Sustainable Road Freight, University of Cambridge quotes a number of scenarios:

'Scenario 3' produced through the SRF roadmapping project demonstrates that carbon emissions from UK road freight could fall by 78% between 1990 and 2050, while handling increased demand for the movement of goods.

Preliminary estimates indicate that the entire Motorway network in the UK could be electrified (for battery charging purposes) for about 20% of the cost of the HS2 project.

Another model is to use passenger terminuses at night to bring in trainloads of freight into the heart of cities, when the passenger elements of the station are closed. Two successful trials were carried out into Euston at night with Colas Rail delivering full train loads for Sainsburys and TNT respectively for transshipment into low emissions vehicles.

Our rural location can be seen on one of the reports maps:

