



West Midlands Interchange

OBJECTION TO DEVELOPMENT PROPOSALS

Project reference TR050005

Written Representation submitted by Christopher Walton

Registration ref I.D no. 20015378

Original Relevant Representation Reference: RR-0777

Submission Deadline 3

24th April 2019

Introduction

Further to my previous submission at deadline two (your reference REP2-177 refers) recording my objections to the WMI development proposals I take this opportunity to further advance my argument, reinforced with information now presented within submissions of others, at Deadline Two.

I have read nothing within the Deadline Two submissions that causes me to reconsider my opinion that the effect of the proposed scheme is ill conceived and its impact devastating.

Within the proposal documentation the developer has presented its responses against the technical and industry standards applicable to the various components of the scheme to demonstrate compliance with relevant specifications, policies and law.

However, adherence to tick box methodologies and conformity with regulations and directives does not mechanically deliver a scheme that is either appropriate or acceptable. Most critically it is not how people living within the community and others affected by the proposals judge the acceptability and impact of the scheme.

The views and opinions of the community, based on direct knowledge and experience, underpinned by the legitimacy of living or working within the area, offer a perspective that is valid and extremely relevant in assessing the scheme in the round, judged on its overall effect not bureaucratically broken down into individual elements. I request therefore, that you consider the effects of the proposals across all areas of impact holistically when undertaking your evaluation.

Effect

The impact of the proposed development will negatively affect the thousands of residents living within the area. An overall degradation in the quality of life will be experienced and that change will be dramatic and irrevocable.

The scale of the proposal is uncompromising, showing no regard for the lives of those affected, it brutally despoils the green belt location and will overwhelm local community infrastructures the highway network and motorway.

The planned scheme is presented as a vehicle to support government policy..... **“providing economy and efficiency for business and, particularly, because of the substantial environmental benefits achieved by transferring longer-distance freight movements from road to rail.”**

I therefore find the total absence of any fixed guarantee to achieving any firm carbon and air pollution reduction targets within the submission documentation surprising and negligent. I question as to how the many confident and unsubstantiated commitments made within the proposal documents, asserting the contribution of the scheme towards achievement of government policy, can in any way be meaningfully assessed without the inclusion of a comprehensive suite of S.M.A.R.T. performance indicators.

Without such measurable commitments it would permit the developers to gain the planning consent advantages, available within the criteria of the Planning Act 2008 for Nationally Significant Infrastructure Projects, without creating the incentive for them to vigorously promote the rail served element of the warehousing constructed. Critically this could allow significant areas of the site to be used for conventional road fed warehousing. Clearly that would frustrate government policy objectives and would plainly be an illegitimate use of green belt land.

In support of my concern I bring to your attention the following paragraph from the submission that really does not inspire confidence,

11.5.1 “It is not possible to calculate with a high degree of accuracy the amount of carbon which will be saved when the Proposed Development is fully operational. The carbon saved will depend in part on the identity of the on-site occupiers and will vary over time as rail connectivity becomes more established around the country.....”

Conclusion

In conclusion I wholly reject the scheme proposals, I consider them to be based on speculative assumptions in respect of the achievement of carbon and air pollution reductions, market projections and local employment need.

I acknowledge the content of the professional and comprehensive submissions presented at Deadline Two by South Staffordshire and Staffordshire County Council’s and request due regard is paid to the issues raised within these documents as they represent many of my concerns.

Without prejudice, should consent be granted, I do not believe the proposals of the developer adequately recognise the distress and burden this scheme will place on affected communities. There is no meaningful offer to the community to help offset the detriment the scheme will produce.

Although presented in the planning proposals, as for the benefit of the community I do not view the road management improvement scheme as anything other than a necessary development for operational reasons and a requirement to gain the support of highway authorities. Similarly, the reason for the development of two “country parks,” in my opinion is solely to address the essential need for the developer to replace some of the habitat that will be destroyed during construction

of the scheme and to demonstrate that responsibilities for the protection of the environment have been discharged.

Separately therefore, consideration should be made to acknowledge that the negative impact of the scheme on the community is recognised. For e.g. I note at Deadline Two a contributor, together with the Canal and River Trust, discussed within their submissions the concept of creating a cycle path from Penkrige along the canal towpath and through the proposed site. I see this as an idea, doubtless one of many, that would genuinely offer community benefit and requires to be pursued.