

<p>Deadline 4 Submission on Applicant's Responses to Reports by Stop the West Midlands Interchange (Ansons Solicitors Limited)</p>	<p>Agriculture & Farming Impact Report (REP2-165) Summary Page: Reference to Agriculture Bill (2017- 19).</p>	<p>Applicant's Comments: <i>The Agriculture Bill does not include anything relevant to Agricultural Land Classification (ALC) or Best and Most Versatile (BMV) agricultural land.</i></p> <p>Group's Response: The Group did not state that it did. The reference they refer to point 3.1 in the report - NOT 3.2. However it is a key bill that is very relevant to this development and where:</p> <p>"The Secretary of State may give financial assistance for or in connection with the following – Managing land or water in a way that protects or improves the environment; Supporting public access to and enjoyment of the countryside, farmland or woodland and better understanding of the environment. Managing land or water in a way that maintains, restores or enhances cultural heritage or natural heritage; Mitigating or adapting to climate change; Preventing, reducing or protecting from environmental hazards; Protecting or improving the health or welfare of livestock; Protecting or improving the health of plants."</p> <p>It must also be pointed out that within the Applicant's mitigation, paragraph 6.60 in the ES Chapter 6 clearly states: "There is no mitigation for the loss of agricultural land (i.e. the land use will be permanently changed) during the construction phase."</p> <p>Construction Residual Effects 6.78 As there is no mitigation for the permanent loss of agricultural land, the significance of the residual effect of constructing the Proposed Development on approximately 51.1 ha of Grade 2 agricultural land is assessed as being permanent, major adverse effect at a national level. 6.79 The significance of the residual effect of constructing the Proposed Development on approximately 121.9 ha of Subgrade 3a agricultural land is assessed as being permanent, major adverse at a national level 6.81 The significance of the residual effect of constructing the Proposed</p>

	<p>Development on approximately 38.2 ha of Subgrade 3b agricultural land is assessed as being permanent, minor adverse effect at a national level.</p> <p>The District has higher than National averages of Grade 2 and Grade 3 BMV land. The District will be losing 211.2 ha of Grade 2 and Grade 3 BMV land (over 500 acres). The applicant has failed to provide the economic classification of this land based on standard net outputs as part of the ALC.</p> <p>The Net Zero Technical Report (Committee on Climate Change May 2019) Chapter 7 Agriculture states – “England and the DAs have an ambition to increase woodland creation, which if achieved, would deliver annual planting of 20,000 hectares by 2020.”</p> <ul style="list-style-type: none"> • There are proposals to increase the planting of trees on-farm, albeit by an unspecified amount. This should be clarified. <p>Deep emissions reduction in the LULUCF sector rely on fundamental changes in how land is used. These entail releasing land from agriculture to other uses such as increasing afforestation, planting energy crops, restoring peatlands and increasing agricultural diversification:</p> <ul style="list-style-type: none"> • Increasing afforestation rates. Historic UK tree planting rates suggests it is possible to go beyond the ambition set out by England and the DAs. Analysis for the Committee's land use report suggest a high ambition could achieve 50,000 hectares of new woodland per year. This is not far off the planting levels achieved in the early 1970s in England, Scotland and Wales, when including both afforestation and restocking of existing forested areas. • Improving forest productivity. Options include:– Forestry management. Around 80% of broadleaf woodlands in England (74% of woodland area) are in an un-managed or under-managed state. Introducing sustainable management into neglected woodlands can enable young and better quality trees to thrive, which can allow for increased carbon sequestration. It can also increase resilience to wind, fire, pests and diseases, which could increase under a warming climate, thereby avoiding carbon losses from dead trees. – Options include:– Hedgerows. The current area of hedgerows on farms in the UK is around 120,000 hectares. Creating more hedgerows can deliver
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	<p>(Section 5.3) “The mosaic of farmland and woodland is home to a number of species of farmland birds, which are nationally in decline. This includes, notably, lapwings (<i>Vanellus vanellus</i>), bullfinches (<i>Pyrrhula pyrrhula</i>) chaffinches (<i>Fringill coelebs</i>), goldfinches (<i>Carduelis carduelis</i>) and yellowhammers (<i>Emberiza citrinella</i>). The loss of this habitat would result in the loss of these farmland bird species from the immediate area of development, due to their need for open farmland and woodland in order to feed, roost and breed.”</p>	<p>Group’s Response:</p> <p>“Ecological management and mitigation plan 11.(1) No phase of the authorised development which incorporates ecological management or mitigation is to commence until a written ecological mitigation and management plan for that phase has been submitted to and approved in writing by the local planning authority. The ecological mitigation and management plan must be in accordance with the principles set out in the framework ecological management and mitigation plan. The ecological mitigation and management plan may be subject to alteration by agreement in writing by the local planning authority.”</p> <p>Has this mitigation scheme been devised solely for the more common species present such as the common pipistrelle bat, or has it considered other less common species (but ones that are still present), such as the Natterer’s bat? Research has shown that a significant number of mitigation measures result in increased proportions of more disturbance-tolerant species of bat and lower numbers of the less tolerant species.</p> <p>(Section 5.3) Applicant’s Comments: <i>The following mitigation measures are included within the FEMMP (Document 6.2, ES Technical Appendix 10.4, APP-090), secured by DCO Obligation to mitigate against the adverse effect of loss of the farmland on the species this habitat supports, namely farmland birds:</i></p> <p><input type="checkbox"/> <i>Enhancement and management of 12 hectares of existing intensively managed arable farmland off-site (within 1 km of the Site) dedicated for the benefit of farmland birds – (Draft Obligation, Document 7.7B, APP-157).</i></p> <p>Group’s Response:</p> <p>If the conservation area for farmland birds is off-site, surely this will remove them along with their habitats from the area (if only a little way away).</p>
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	<p>(Section 5.3) “The proposed development will lead to the loss of a significant amount of nearby farmland, scrub and marshland, which is used by herons for feeding. Furthermore, due to their lack of tolerance towards disturbance by humans, increased activity around the site is likely to adversely affect the numbers of herons in and around the area.”</p>	<p>(Section 5.3) Applicant’s Comments <i>ES paragraph 10.314 (Document 6.2, ES Chapter 10, APP-030) predicts a maximum daytime increase of up to 1 dBLAeq,T across the Gailey Lower and Upper Reservoirs. A maximum night time increase of up to 1 dB LAeq,T is predicted in the same locations. Baseline day-time noise levels at Gailey Lower and Upper Reservoirs are 52 dB LAeq,T in the baseline situation. It was concluded that, given the distance away of the heronry and existing proximity to the noisy and busy M6, disturbance effects from noise in the operational phase are considered unlikely.</i></p> <p>Group’s Response: Noise pollution will increase with more traffic regardless of how much it increases. This certainly won’t benefit the heronry but even if noise pollution has a minimal effect, air pollution is likely to have at least some effect. Furthermore, the herons only nest at the site, they travel to surrounding habitats to hunt, including areas of scrub and marsh on the development site. Removing suitable foraging areas from the vicinity is likely to reduce the number of herons that the heronry can support as their food supply and range of food sources is compromised. Nearby developments in the past as well as a recent increase in competition from cormorants have already reduced their options for obtaining food.</p>
	<p>(Section 5.4) “Brown Hares (<i>Lepus europaeus</i>) are present in the area. They are locally scarce and nationally in decline. They need open farmland to thrive, feed and breed. Very susceptible to traffic and the proposed development would restrict their movements, resulting in habitat fragmentation and separation and isolation of populations.”</p>	<p>(Section 5.4) Applicant’s Comments <i>As stated in Paragraph 4.10.4 of Appendix 10.1 Ecology Baseline Report (APP-087), no brown hares were observed on site during the course of the regular ecological monitoring surveys that were undertaken in 2016 and 2017. It was concluded likely that brown hares are absent from the Site.</i></p> <p>Group’s Response: Brown hares are present and have been observed on site. Brown hares are found in several areas near to the site. It may be the case that they are currently absent (although they have been present in the very recent past), but they are very mobile and willing to breed in open farmland and scrub so removal of these habitats (if the area is developed) will effectively remove any</p>

	<p>(Section 5.4) “Water Voles are nationally in decline, their numbers have been vastly reduced in recent years throughout Staffordshire although they are found where canal banks hold suitable habitat. Development of canal towpaths effectively removes such suitable habitat”.</p> <p>Health Impact Report (REP2-162)</p> <p>Summary of Our Objections</p> <p>□ South Staffordshire District Council describe air quality in most of Staffs is “good”. However, there are four Air Quality Management Areas in Staffs which are close to the Air Quality Limits. Three of these are</p>	<p>chance of them ever moving back to the site again. Without the loss of such habitats and a simultaneous increase in traffic, there is every chance that brown hares could move back to the site if given the opportunity.</p> <p>(Section 5.4) Applicant’s Comments <i>As stated in paragraph 4.8.15 of ES Technical Appendix 10.1 Ecology Baseline Report (Document 6.2, APP-087), water vole are considered absent from the Site (including the 3.5km stretch of canal surveyed based on 2016 and 2017 survey findings).</i></p> <p>Group’s Response: Water voles may be absent from the canals immediately in and around the site but they are certainly found in nearby, interconnected water bodies. If canals in the area are managed in order to make the habitat suitable, this would promote the recovery of a species currently in serious national decline. Water voles need water bodies to colonise if they are to be allowed to recover their numbers nationally. Any inconsiderate development of suitable waterside habitats in the development area would act as a barrier to the recovery of this species and possibly prevent them ever from re-colonising the area, even if their numbers were to recover.</p> <p>Applicant’s Comments: <i>The air quality impacts in relation to the Air Quality Management Areas was raised by the ExA in the First Written Questions. The Applicant’s response to the question on this topic (ExQ1.8.9) is set out in the Applicant’s Responses (Document 10.1, REP2-009) and is considered to address this point.</i></p> <p>Group’s Response: It is noted that PM2.5 and PM10 are not monitored in South Staffs and the calculations for these particular emissions have been calculated using a DEFRA calculation. The Group request information as to</p>
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	<p>within 5 miles of the proposed development.</p> <p>“We will progressively cut public exposure to particulate matter pollution as suggested by the World Health Organisation. We will halve the population living in areas with concentrations of fine particulate matter above WHO guideline levels (10 µg/m3) by 2025.</p>	<p>what the current levels of those particular emissions. Our air quality is rated as “good” and we note that some of the baseline readings in the Applicant’s document Table 7.6.4 of ES Technical Appendix 7.6, Document 6.2, APP-072) for PM2.5 &10 are above 10ug/m3.</p> <p>3.0 and 4.0</p> <p>Applicants Comments: <i>The draft Clean Air Strategy 2018 has now been superseded by the Clean Air Strategy 2019 which was published on 14 January 2019. The commitment to reducing exposure to PM2.5 concentrations is outlined as follows:</i></p> <p><i>“We will progressively cut public exposure to particulate matter pollution as suggested by the World Health Organization. We will set a new, ambitious, long-term target to reduce people’s exposure to PM2.5 and will publish evidence early in 2019 to examine what action would be needed to meet the WHO annual mean guideline limit of 10 µg/m3.</i></p> <p><i>☐ By implementing the policies in this Strategy, we will reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the WHO guideline level of 10µg/m3 is reduced by 50% by 2025.”</i></p> <p><i>The results of the modelling of the impact of the proposed development on air quality (Table 7.6.4 of ES Technical Appendix 7.6, Document 6.2, APP-072) shows that all of the increases in PM2.5 concentrations are negligible and therefore the proposed development will not delay achievement of the Clean Air Strategy 2019 target.</i></p> <p>Group’s Response:</p> <p>The location for the development is not a long term sustainable option. As part of our response to the DCO, the Group requested that Gailey becomes an AQMA as it is inevitable that air quality limits will be exceeded. The Net Zero Technical Report (Committee on Climate Change May 2019) Chapter 5 Transport states - opportunities to improve the logistics efficiency of HGVs must be explored, including increased roll-out of urban consolidation centres to minimise journeys into busy urban centres and adjusting delivery times to ensure HGVs can avoid congestion.</p>
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	<p>2.0 Air Pollution NPSNN - 5.10 - The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation.</p> <p>The daily emissions to air data for the current incinerator facility at Four Ashes is as follows: Dust (Particulates) 10mg/m3, Total Organic Carbon 10mg/m3, Hydrogen Chloride 10mg/m3, Carbon Monoxide 50mg/m3, Sulphur Dioxide</p>	<p>Deep reductions in HGV km driven by societal changes in the way we produce and consume goods could offer an alternative to switching part of the fleet to zero emission vehicles. Options that could drive these changes include increasing the longevity of appliances, electronics and clothes, repairing and refurbishing them where necessary, or a reduction in consumption combined with a focus on reusing goods, locally growing food and driving down volumes of waste. There is also potential for growth in the use of 3-D printing technologies to additionally improve logistics efficiency.</p> <p>2.0 Air Pollution Applicant's Comments: <i>The air quality impacts in relation to the NPS was raised by the ExA in the First Written Questions. The Applicant's response to the question on this topic (ExQ1.8.9) is set out in the Applicant's Responses (Document 10.1, REP2-009) and is considered to address the comment.</i></p> <p>Group's Response: In the Report Future of Freight Call For Evidence Dec 2018, the Applicant states: "Research by Campaign for Better Transport on behalf of Department for Transport showed that expansion of rail freight could have a significant impact on current and projected congestion on the roads in those corridors (A14, A34 and parts of the M6)." The Applicant also gave this answer to the following question: How does congestion affect the environmental impacts of the movement of freight? Applicants Response in the Report: Congestion increases the impact of freight movements on the environment.</p> <p>Applicant's Comments: <i>The Veolia emissions data are the permit emission concentrations with a subsequent graph showing that the Energy Recovery Facility operates with emissions below the permitted concentrations. The facility is subject to an Environmental Permit (HP3431HK) granted by the Environment Agency and the permit would not have been granted had significant impacts on the environment been predicted.</i></p>
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	<p>50mg/m³ and Oxides of Nitrogen 200mg/m³. (Veolia website)</p> <p>3.0 Ref: Air Quality: Draft Clean Air Strategy 2018 4.0 Ref: Governments Proposed Actions: Draft Clean Air Strategy 2018</p> <p><input type="checkbox"/> We will progressively cut public exposure to particulate matter pollution as suggested by the World Health Organisation. We will halve the population living in areas with concentrations of fine particulate matter above WHO guideline levels (10µg/m³) by 2025.</p>	<p>Group's Response: If Veolia are reporting correctly then their emissions coincidentally are exactly the figures recommended according to DEFRA's figures which are: Total Dust 10mg/m³, total organic carbon 10mg/m³, Hydrogen Chloride 10mg.m³, Carbon monoxide 50mg/m³, Sulphur Dioxide 50mg/m³, Oxides of Nitrogen 200mg/m³. From the following report Evaluation of the Climate Change Impacts of Waste Incineration in the UK (Oct 2018 Rev 1.01 April 2019 pg 31), that particular incinerator at Four Ashes burned 339,946 tonnes of waste and emitted 305,952 tonnes of CO₂ in 2016 = 0.9 tonnes of CO₂ emitted per tonne of waste incinerated. Is this good for our environment? All without this development going ahead. Based on the data and methods set out in the report, the study found that the release of CO₂ from incinerators makes climate change worse and comes with a cost to society that is not paid by those incinerating waste. The 5 million tonnes of fossil CO₂, released by UK incinerators resulted in an unpaid cost to society of around £325 million.</p> <p>3.0 and 4.0 Applicant's Comments: <i>The draft Clean Air Strategy 2018 has now been superseded by the Clean Air Strategy 2019 which was published on 14 January 2019. The commitment to reducing exposure to PM_{2.5} concentrations is outlined as follows: We will progressively cut public exposure to particulate matter pollution as suggested by the World Health Organization. We will set a new, ambitious, long-term target to reduce people's exposure to PM_{2.5} and will publish evidence early in 2019 to examine what action would be needed to meet the WHO annual mean guideline limit of 10 µg/m³. <input type="checkbox"/> By implementing the policies in this Strategy, we will reduce PM_{2.5} concentrations across the UK, so that the number of people living in locations above the WHO guideline level of 10µg/m³ is reduced by 50% by 2025.</i></p> <p><i>The results of the modelling of the impact of the proposed development on air quality (Table 7.6.4 of ES Technical Appendix 7.6, Document 6.2, APP-072) shows that all of the increases in PM_{2.5}</i></p>
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		<p><i>concentrations are negligible and therefore the proposed development will not delay achievement of the Clean Air Strategy 2019 target.</i></p> <p>Group's Response: Ref: PM2.5 In The UK 2010 –Project ER12 December 2010 – Exposure to PM2.5</p> <p>“Rural annual” means concentrations of PM2.5 range from around 3.5ug/m3 in Scotland to around 10ug/m3 in southern England. Urban background concentrations are a few ug/m3 higher, and are highest in central London at around 15ug/m3. The population – weighted annual mean PM2.5 concentration in inner London in 2010 was estimated to be 14.1ug/m3.</p> <p>Health effects of PM2.5 – There is no recognized threshold below which there are no health effects.</p> <p>Also from this report it must be noted that: Annual mean concentrations close to busy roads will be a few ug/m3 higher still, although concentrations decline rapidly on moving away from the carriageway, such that they are indistinguishable from the background after about 20-50 meters.</p> <p>From the ES Tech Appendix 7.6 Doc 6.2 It states that: 6.3.14 SSC do not operate any PM10 or PM2.5 monitoring stations. This is likely to be because SSC have not identified any areas within the district where PM10 or PM2.5 concentrations are likely to exceed the national objectives in the review and assessment work it has undertaken.</p> <p>In Table 7.6.4 there are 40 human receptors listed, many of the baseline and predicted readings are above 10ug/m3. From where were these readings derived? In fact many are above the mean average PM concentration recorded in inner London in 2010 stated above. The average predicted reading is estimated at 11.5ug/m3 (the total predicted readings divided by number of receptors). This does not meet the overall target stated in the Clean Air 2019 report. South Staffordshire residents do not want their exposure to PM2.5 increasing and nor do they want to be in the 50% of locations with concentrations above 10ug/m3. In terms of the human receptors, the Group seek a description of them in particular for any schools that may be included. NB: dust from brake dust and tyres will increase. The Group request that dust monitoring stations be put in place and also request that the additional dust from the quarry be taken into consideration.</p>
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	<p>Planning Report (REP -158)</p> <p>Stop the West Midlands Interchange object to the proposed development on the following grounds:</p> <p>The proposed development is considered to be inappropriate and is by definition harmful to the Green Belt, In line with policy guidance substantial weight must be given to such harm.</p> <p>The proposal also conflicts with one of the five purposes of Green Belt, as stated in the NPPF; namely ‘to assist in safeguarding the countryside from encroachment’;</p> <p><input type="checkbox"/> Very Special Circumstances (VSC) have not been demonstrated. The applicant has not demonstrated that there is a lack of alternative sites or there is need for this development at the proposed site or within South Staffordshire.</p> <p><input type="checkbox"/> Contrary to Local and National Planning Policy.</p> <p>The development is contrary to adopted Local Plan, NPPF and the National Policy Statement for National Networks (NPS NN 2014).</p> <p><input type="checkbox"/> Environmental Conditions. These are required if consent is granted to protect amenity</p> <p><input type="checkbox"/> Draft Development Consent Obligation. If consent is granted no stand-alone</p>	<p>Applicant’s Comments: <i>The Applicant’s position regarding VSC, as is set out in paragraph 5.178 of the NPS, is set out in paragraph 6.5.3 of the Planning Statement (Document 7.1A, APP-252).</i></p> <p><i>In addition, an update and source note for the Green Belt issues was provided by the Applicant at Deadline 2 (Document 10.1, Appendix 3; REP2-010). In this context, it is helpful that paragraph 6 of the SSDC’s Written Representations (REP2-046) recognizes that the presence of a rail connection can provide the Very Special Circumstances (VSC) necessary to justify the development in this Green Belt location.</i></p> <p><i>A detailed assessment of the Proposed Development’s compliance with the requirements of the National Networks National Policy Statement is set out in the Planning Statement (Document 7.1A, APP-252) and at Section 5 of the SSDC SoCG (REP2-006).</i></p> <p><i>The Mitigation Route Map (APP-155) sets out the mitigation controls and other best practice measures identified in the Environmental Statement (Document 6.2) and identifies the means by which those controls and measures will be secured.</i></p> <p><i>With regards to the timing of the rail infrastructure, please refer to the document entitled “Timing of the Provision of the Rail Freight Terminal”, appended to this document (Appendix 2).</i></p> <p>Group’s Response:</p> <p>Paragraphs 5.170, 5.172 and 5.178 of the NPS are all clear that the policies for controlling development in the Green Belt apply without any modification for SRFI proposals. The proposal is inappropriate development within the Green Belt and inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very special circumstances (Paragraph 87, NPPF). ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (Paragraph 88,</p>
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	<p>warehouse development should be permitted in advance of a satisfactory solutions to pollution and network capacity issues.</p>	<p>NPPF) and the totality of the harm to the Green Belt with the ensuing loss of openness and the encroachment into the countryside is substantial. The development is contrary to the NPPF.</p> <p>Landscape and visual impact would be substantial and adverse. It would cause significant harm to the character and appearance of the local area. The Ecology ES Chapter (Document 6.2, APP-030) assessment acknowledges in Table 10.13 that a significant residual effect at the local scale is anticipated for farmland birds due to the loss of supporting habitats.</p> <p>Network Rail's support for the project gives rise to many questions and no answers.</p> <p>The Applicant's case that very special circumstances exist to outweigh the harm to the Green Belt and other harm has been formulated on the assertion that no suitable alternatives exist within the catchment area. This is untrue. There is no specific quantified need. There are reasons to doubt how attractive this facility will be given the poor rail links. As designed it will be attractive to road users and the group has very real concerns that it may not deliver modal shift to rail due to the constraints of rail access and pathing difficulties and support for SRFI's is based on the assertion that they will deliver modal shift.</p> <p>In theory HS2 phase 2 allows the removal of long distance services from the existing WCML which would open up extra train paths. However if phase 2 of HS2 does not go ahead then that does not happen, and Network Rail will come under pressure to put on more passenger services, which would mean that potentially the 10 paths they've identified for WMI would be reallocated.</p> <p>For this development: Green belt would be permanently lost. The benefits of the predicted modal shift may not be delivered. Train paths might not materialise. If they do passenger services may be adversely affected.</p> <p>In addition the Group has made a separate Submission in relation to the 5th/6th</p>
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	<p>Rail Report (REP2-159)</p> <p>(2.1) “The railway infrastructure in this proposed location is not suitable for additional freight use due to it being located on the Birmingham Loop of the West Coast Mainline, which only has two tracks (up and down).”</p>	<p>June Hearings which is relevant but is not repeated here.</p> <p>(2.1) Applicant’s Comments: <i>None of the 7 operational SRFI are on 4-track railways, and those in the Midlands (DIRFT, Hams Hall, Birch Coppice) connect into 2-track railways.</i></p> <p>Group’s Response: DRIFT is on the Northampton loop, which although is a 2 track section is fundamentally different to the Birmingham loop where the West Midland SRFI is proposed. The Northampton loop is the West Coast mainline freight corridor diverting freight trains from the faster direct main line which runs to the west, ensuring that intercity and freight trains are not forced to share the same section of track. Thus therefore avoiding any speed differentiations. This is not the case on the Birmingham loop where there is a complex mix of inter-city, commuter, local and freight traffic that operates on the rail corridor with trains having varying speeds and stopping patterns. It is notable that these constraints impact the traffic that can be operated all along the route. They limit how many commuter services run into Birmingham and Manchester and the ability to run additional freight trains in the North and Midlands, not just the number of passenger services that can be run into Euston in the peak. Operating the WCML at this intensity makes it challenging to maintain acceptable performance levels. Both Virgin West Coast and London Midland have consistently operated below their Public Performance Measure (PPM) targets since the route upgrade, and these targets have been revised down for Control Period 5 (CP5) in the face of the difficulties experienced in delivering higher performance levels. By adding freight trains within this location will cause further speed differentials and will add an additional bottleneck in an already congested section. Birch Coppice freight hub is situated on a freight only line. Furthermore the proposed East Midlands Gateway hub which, is currently being developed will be served by a dedicated freight line.</p> <p>Applicant’s Comments: <i>The Alternative Sites Assessment (Document 7.2, APP-255) has considered other sites in the area on 4-track sections of the</i></p>
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		<p><i>WCML and did not consider any of these sites to be suitable as SRFI.</i></p> <p>Group's Response: The 4 sites that are referred to in the referenced Report are all on 2 track sections. In section 4.1.7 the Report rejects sites in the East of Staffordshire, where there are dedicated freight lines and 4 track sections because the facility would not "be adequately spaced from existing [rail] facilities" Birch Coppice and Hams Hall and planned Etwall rail freight facilities. Has the Applicant considered why it is that 3 rail freight hubs are all in that close proximity? We would argue that it is due to the favourable rail links described.</p> <p>Applicant's Comments: <i>As the operator of the national rail network, Network is supporting the WMI DCO and has no such concerns about location or main access, noting in the Statement of Common Ground with FAL (Document 8.1, AS0-025) that:</i></p> <p><i>"The development site is located on the Strategic Freight Network, the electrified W10 gauge route capable of accommodating 775m length trains. The location to the North West of Birmingham, 30 km north of Hams Hall and 80 km south of 3MG Widnes, provides a geographically optimal location for a SRFI accommodating future intermodal traffic growth."</i></p> <p>Group's Response: We refer to a Report commissioned by Network Rail for the Department of Transport "Options for Potential Capacity and Connectivity Enhancements to the Existing Network. A report for the Department for Transport", In the Report they set out the challenges facing the WCML and the infrastructure improvements required to meet future rail demands. In this aforementioned Report they make the following statement in the Operation Resilience in Section 7 In 2012, Network Rail undertook a study to understand the relationship between reliability, capacity and cost. The southern section of the West Coast Main Line (107 miles) was selected as the study area given its status as a key intercity passenger route in the UK as well as its handling of a significant proportion of the UK's rail freight traffic. A system level, modelling tool produced by Det Norske Veritas (DNV) Ltd was used to estimate the effect of increasing frequency on reliability. The study looked at scenarios</p>
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		<p>with more trains per hour than assumed in any of the packages discussed in the Options for Potential Capacity Report. The study found that the implementation of a high capacity future timetable without measures to improve resilience would result in a significant deterioration from current performance levels, including an increased number of train cancellations. The operation of higher frequencies whilst delivering an acceptable level of performance would require additional investment in both infrastructure and rolling stock. The infrastructure specified is capable of delivering the train service specifications but no detailed consideration has been made as to whether additional infrastructure would be required to ensure resilience of the services. As such, the cost estimates provided do not include any additional infrastructure that may be required to ensure resilience at higher frequencies. In the cited Report a number of options are considered by Network Rail, however we would refer to section 6.2.9 WCML Service Package D ('High' output scenario with HS2 Phase One). This option seeks to provide for long term Freight growth forecasts. This package provides infrastructure to allow segregation of long distance passenger services with key freight flows. These improvements seek to separate freight from high speed line movements through the introduction of four tracks where possible, the installation of dynamic passing loops and line speed improvements. The cost of this option is estimated at £5.6bn. With rising costs of HS2 and phase 2 of HS2 now in doubt the likelihood of these infrastructure improvements being implemented are doubtful.</p> <p>Recent major projects undertaken by Network Rail to separate freight and intercity trains most notably in the Stafford Area Improvements Programme has sought to avoid conflicting train movements to enhance local capacity gains, improve network punctuality and reduce journey times. This proposal is contrary to the improvements made by Network Rail.</p> <p>Ref: Staffordshirenewsroom 17th May 2019.</p> <p>"Major changes to train services in Staffordshire introduced this weekend will improve passengers' experience and benefit business", the county's economy leader has said.</p> <p>"On Sunday May 19, the biggest changes to rail timetables in the region in over a decade will take effect. New services will increase capacity, bring more through journey opportunities and increase evening frequencies and later</p>
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	<p>(2.2) “There is a large difference in level between the road (A5) as the track runs through a cutting for much of the proposal site – restricting the use of sidings and adjacent buildings. There is no connection possible to the remaining dozen warehouses due to levels and a historic canal.”</p> <p>(2.7) “The creation of nodal yards can create the capability for freight to operate in paths that are more appropriate and deliver</p>	<p>trains. The new timetables will be on services operated by West Midlands Railway and London Northwestern.</p> <p>One major improvement has been the electrification of the Chase Line, which runs from Rugeley Trent Valley to Walsall. More services will operate between Rugeley Trent Valley and Birmingham in the evenings and weekends. Most services from Rugeley Trent Valley will continue to Birmingham International and London Euston.</p> <p>There will also be improved services on the Lichfield to Bromsgrove Cross City Line and the Shrewsbury to Birmingham line which stops at stations in South Staffordshire. In addition there will be hourly services from Stone to Birmingham and a new half-hourly service from Penkridge to Liverpool, with more services, particularly at evenings and weekends and increased capacity on trains running through the county,”</p> <p>More passenger services mean therefore less capacity for freight.</p> <p>(2.2) Applicant’s Comments: <i>The amount of warehousing on SRFI with direct siding access varies considerably between sites, with Hams Hall, Wakefield Europort and the latest developments at iPort Doncaster and East Midlands Gateway having no warehouses on site capable of being directly rail-linked.</i></p> <p><i>As noted by the Applicant in their response to ExQ1.2.20 (Document 10.1, REF), this point was considered by Secretary of State for the recent East Midlands Gateway SRFI application. The Secretary of State was satisfied with the proposals being capable of operation as a SRFI (including the access to the main line being via a 2-track freight-only branch line).</i></p> <p>Group’s Response:</p> <p>What the Applicant fails to state is that the East Midlands Gateway line is a dedicated freight line, whereas WCML is a mixed commuter and freight line and is one of the busiest lines in Europe so not comparable.</p> <p>(2.7) Applicants Comments: <i>WMI is located between the major nodal yard at Crewe Basford Hall and Bescot Yard, obviating the need to create another such facility on site. Network Rail, the operator of the national rail network, is</i></p>
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	<p>benefits such as improved timetable capacity and network performance. Developed at strategic geographic locations, nodal yards act as freight traffic staging and regulation points at the confluence of adjacent route sections, enabling effective management of freight traffic flows.”</p> <p>(3.0) “To facilitate additional freight capacity on the WCML, Four Ashes Ltd are reliant on HS2 encouraging existing services moving over to the new line. There are no guarantees that this will happen.”</p>	<p><i>supporting the WMI DCO and has no such concerns about nodal yard provision.</i></p> <p>Group’s Response: The freight traffic will be joining the WCML on a two track section. Network Rail have recently completed the Norton bridge flyover to separate slow moving trains from faster ones to remove the bottle -neck. By allowing a freight terminal in this location they are potentially creating a new bottle- neck.</p> <p>(3.0) Applicant’s Response: <i>No such claim is made in the Applicant’s documentation. The Statement of Common Ground between FAL and Network Rail (Document 8.1, AS0-025) sets out Network Rail’s position on network capacity on section 3.6.</i></p> <p>Group’s Response: We refer to the Supplement to the October 2013 Strategic Case for HS2 Technical Annex: Demand and Capacity Pressures on the West Coast Main Line produced by the Department for Transport “Network Rail anticipates that rail freight volumes will grow by over 40 per cent by 2023 compared with 2011 and by around 90 per cent by 2033. Notably for the WCML, the intermodal segment is expected to continue to grow the fastest. Network Rail’s overall forecasts suggest that the requirement for WCML paths could increase from 42 today to 80 by 2033. Given the capacity constraints on the existing network, this additional pressure for freight paths would be challenging to accommodate without infrastructure investment. As it adds limited additional route capacity, the Strategic Alternative offers very little in helping meet the increase in demand for WCML freight paths that is forecast by Network Rail. In contrast, by releasing capacity on the WCML, HS2 could facilitate North-South freight movements, particularly intermodal traffic from the ports of the South East and Liverpool.”</p>
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	<p>(3.7) “The most exasperating situation is that just five miles away from Four Ashes is the Freightliner (Pentalver) intermodal depot in Cannock. This yard was developed on the site of the former opencast coal loader for filling railway wagons for power stations. The site was demolished and Pentalver developed a container base on the site. Pentalver have now been taken over by US giant, Freightliner. The company have applied for and been granted planning consent to operate as a rail freight facility. There is an adjacent industrial park development. Within the last two years Network Rail have renewed the point-work off the mainline into the facility and re-signalled it as part of the modernisation. In addition the Cannock line has been electrified and the first electric trains ran trials in 2018.”</p> <p>(4.0) “This proposal will go against the recommendations put forward by the Freight Network Study 2017 which places significant emphasis on improving average speeds on lines, which it states is a "crucial factor in enabling rail freight to offer a viable alternative to road haulage and in encouraging modal shift to rail. At present, end-to-end journey time of freight flows on some key corridors can be very long and average speed very low, restricting rail freight’s ability to offer a competitive service and price to its</p>	<p>(3.7) Applicant’s Comments: <i>Pentalver is on a 2-track branch line off the WCML, is not operational, and has no nodal yard facilities on site (or any proposals to create a nodal yard). This view is therefore entirely inconsistent with other points made in the Stop The West Midlands Interchange Rail Report. Network Rail has raised no such concerns.</i></p> <p>Group’s Response: Network Rail are missing the point. The Pentalvar scheme does not require a nodal yard on the 2 track branch line as it will be a dedicated freight line. The Freightliner RFI at Cannock is based on the successful wheel and spoke logistics system which the Applicant have argued against previously, to try and justify the size of the WMI site.</p> <p>(4.0) Applicant’s Comments: <i>The Proposed Development is supported by Network Rail (see Statement of Common Ground (Document 8.1, AS0-025)) and is referenced in Network Rail’s latest freight strategy document (Freight & National Passenger Operators Route Strategic Plan 2018, page 145), reiterating Network Rail’s support. Network Rail has raised no such concerns.</i></p> <p>Group’s Response: There are loops but the issue that freight and fast trains will still share the same track for large sections this is something Network Rail are keen to avoid. Hence Network Rail built the Norton bridge flyover. There is only one up and down line in that section so any fast trains will</p>
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	<p>customers. The key drivers of reduced end-to-end journey time are the line speed capability of the infrastructure and the quality of the train path in terms of minimising the number and duration of stops made in passing loops. In terms of maximum line speed and the number of sections of low line speed e.g. permanent speed restrictions; improvements to line speed capability can include both increasing the maximum line speed (to 125 mph) on a route and reducing the number of sections of low line speed. The latter is particularly critical, since if a heavy freight train is required to slow to a low line speed, accelerating back up to full speed takes considerable time.</p> <p>(4.3) “The applicant has recently submitted to PINS, a Statement of Common Ground between FAL and Network Rail. It reveals that they worked on the WMI project with Network rail since 2008 until it was shelved in 2011 due to global downturn. During that decade the proposal has only reached GRIP2 (Feasibility). The GRIP process is Network Rails method of processing infrastructure.</p>	<p>be delayed until a freight train can get to a loop. Furthermore HS2 is not yet a certainty and the number of rail users are increasing. The new franchisee West Midlands Trains on the line wants to add additional train services so there may not be 4 routes available for long.</p> <p>Electric freight is not normally what would be expected. Intermodal traffic normally runs at a maximum speed of 75mph but diesels struggle to manage those speeds unless the boxes are empty or lightly loaded.</p> <p>Most shipping centres are on Southampton and Felixstowe but with some operation around London Gateway, Teesport and Liverpool. None of those ports have electrified rail connections and need diesel loops to start their journeys off, or end them</p> <p>There are actually a relatively small number of electric loops for freight use but the electrified network is poor anyway being passenger service based.</p> <p>Because the southern portion of the West Coast main line is so congested with passenger trains, the current arrangement is for much of the Felixstowe traffic to come across country via Peterborough and Nuneaton using diesel trains, as well as all the traffic to Southampton.</p> <p>(4.3) Applicant’s Comments: <i>No other SRFI submitted through DCO or the Town & Country Planning Act has developed further than GRIP2 at the time of submission.</i> <i>Network Rail has raised no such concerns.</i></p> <p>Group’s Response:</p> <p>The GRIP level is of less concern to Network Rail as a facilitator, than to those examining the proposal. The lower the GRIP stage for NR the less preparation they need to do. The lower the GRIP stage for assessors, the more guesses they must make</p>
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	<p>That level indicates that progress is years away from meaningful agreement (whereas global downturn is with us again)".</p> <p>(</p> <p>(4.5) "It is noted that FAL have mentioned the China UK rail connection as part of freight growth. However that is a high priced service for urgent items, too heavy for air and produced inland, that mainly assists Chinas Belt & Road political strategy. To replace a single container ship would require up to 100 rail journeys."</p>	<p>for what is the critical part of a rail project. This GRIP Stage has even not reached Option Selection (GRIP3) suggesting that the rail design has not been seriously considered. We await the Applicant's review of other SRFI GRIP stages as requested by PINS. We refer to WMI's rail consultant Nick Gallop of Intermodality (Rail Freight Group News May 2019):</p> <p>http://www.rfg.org.uk/wp-content/uploads/2019/05/RFG-News-Issue-135-May-2019.pdf</p> <p>With the motto of "build it and they will come", Intermodality seem to have used the lighter touch on this and the two Northampton projects. The GRIP stages are repeated below:</p> <ol style="list-style-type: none"> 1. Output definition 2. Feasibility 3. Option selection 4. Single option development 5. Detailed design 6. Construction, test and commission 7. Scheme handback 8. Project close out <p>(4.5) Applicant's Comments: <i>No evidence is submitted to substantiate this. The industry association for the companies operating the majority of intermodal road-rail services in Europe (the UIRR) state in their latest report that "Traffic is dynamically developing on Western Eastern relations, and even more within the Eastern countries and along the intercontinental routes towards China, Russia and Turkey," with 40% growth in traffic between Germany and China between 2017 and 2018 (UIRR Report 2017-18 page 35).</i></p> <p>Group's Response:</p>
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The information Chinas Belt & Road strategy is clearly referenced to Forbes analysis in the Report. And a radical increase in one way cargo to Germany does not necessarily benefit the UK economy. The number of containers is simple arithmetic although ship capacity increases yearly with 6000 to 12000 TEU common and 18000 TEU now being produced. Train capacity is still based at 600m trains that may not be full.

A helpful BBC article <https://www.bbc.co.uk/news/magazine-21432226> explains how Ports such as Felixstowe run out of space to store containers and need to move them out as fast as possible.

Some 20% of the World's containers are said to be empty and need storage. Further details of the unbalanced trade with China, the higher value of produce necessary for train viability and the problems involved are detailed in the reference below: (and in the Forbes article referenced previously).

<https://www.railengineer.co.uk/2018/04/10/containers-lots-of-from-china/>

Significant political effects and tariffs will now come into play that will act upon this trade bubble.

China's \$1.9 Billion Belt-and-Road Rail Project Goes Off Track

Bloomberg:see - <https://www.bloomberg.com/news/articles/2019-06-03/china-s-1-9-billion-silk-road-rail-project-goes-off-track>

Lowest retail sales growth for 15 years dash China's hopes that consumption will offset trade war

- See South China Morning Post:

<https://www.scmp.com/economy/china-economy/article/2178024/lowest-retail-sales-growth-15-years-dash-chinas-hopes>

Jaguar Land Rover worldwide sales were down 12.2 per cent on the year for last month as it continued to be hit by falling demand from China.

The fall off in sales **in China in the month was 26.4 per cent**, with Europe down 9.6 per cent and North America 1.5 per cent lower.

See Shropshire Star:

<https://www.shropshirestar.com/news/business/2019/06/11/sales-down->

	<p>Highway and Transportation (REP2-161)</p> <p>Questions raised in respect of the approach to modal share,</p> <p>More detail should be provided regarding the operation of the proposed shuttle bus,</p> <p>Provision for extended cycle facilities towards Penkridge,</p> <p>Should not base modal shift targets on i54</p> <p>Request for details of proposed end users.</p> <p>Lack of shift change assessment at 2036</p>	<p>122pc-for-jlr-in-may/</p> <p>In addition the Group has made a separate Submission in relation to the 5th/6th June Hearings which is relevant but is not repeated here.</p> <p>Applicant's Comments: <i>Matters in respect of the modal share assumptions used to inform the trip generation approach have been agreed. See paragraph 2.2.2 of The HE SoCG (Document 8.6, REP2-008) and paragraph 9.7 of the SCC SocG (Document 8.5, REP2-007). It is important to stress that the assessments undertaken of the Strategic Route Network are considered by HE to present a worst case assessment, please see HE's response to ExA FWQ 1.7.6 (Document REP2-036). See SCC answer to ExA FWQ 1.7.6 (Document REP2-063).</i></p> <p><i>With regard to the proposed shuttle bus, paragraph 5.4.8 of the Transport Assessment (Document 6.2, Technical Appendix 15.1, APP-114) is clear that the introduction and final routes of the shuttle buses will be determined by the Transport Steering Group in order to respond to circumstances when the origins of future employees are known. A specific fund for the delivery of the shuttle buses is set out within the draft Obligation. In addition, operators may seek to operate their own, bespoke shuttle bus services in addition to the developer funded services.</i></p> <p><i>Existing cycle links are provided along A449 towards Penkridge, to the north of the Gailey Roundabout, as shown in Document 6.2, Technical Appendix 15.1 Figure 2 (APP-116). It has been agreed with SCC, as referenced at paragraph 9.5 of the SoCG (Document REP2-007) that an appropriate package of mitigation measures has been identified.</i></p> <p><i>Modal shift targets are not based upon outcomes identified at i54. The Sustainable Transport Strategy (Document 6.2, Technical Appendix 15.1, Appendix G, APP-137)) provides details of the success of the Travel Plan at i54 in order to show what positive outcomes can be achieved through the measures provided by Travel</i></p>
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	<p>Road Infrastructure Report (REP2-160)</p> <p>According to National Policy for SRFI's they should be placed in appropriate locations. WMI is not connected to an extensive trunk road network or near to a major conurbation. The A5 heading west from Gailey to Priorslee was detrunked in 1995 and narrows in places and is highly unsuitable for HGV's and this has not been considered in the traffic impact assessments. Statement T9 in the Strategy for the A5 2011 -2026 states that where possible, major developments sites should be located close to existing public transport services and interchange facilities.</p> <p>We believe that WMI will not function as a SRFI and consequently will generate greatly</p>	<p><i>Planning.</i></p> <p><i>The Proposed Development is a speculative one and it is normal that at this planning stage, the end users are not known.</i></p> <p><i>No requirement has been made by HE to test the shift changes junction operation at 2036. However, review of Technical Note 31 Shift Change Assessment (Document 6.2, Technical Appendix 15.1, Appendix S, APP-148) demonstrates that the proposed new junctions with the SRN operate with significant reserve capacity during these times.</i></p> <p>Group's Response: See the Group's separate documentation in respect of the SWTP.</p> <p>Applicant's Comments: <i>The site is surrounded by and close to the Strategic Road Network (SRN) namely the A5, A449, M6 and M54. It is also close to the major conurbations of Wolverhampton and Birmingham. The A5 west of Gailey roundabout is not part of the SRN, however it is still a county level distributor road and suitable for local and regional traffic, including HGVs. Impact on the local roads will be monitored and a monetary fund will be made available to implement mitigation if it is recorded that WMI HGVs are using inappropriate routes. This is set out in the HGV Management Plan (Document 6.2, Technical Appendix APP-138) and agreement to this with SCC, the local highway authority, is set out in the Statement of Common Ground (Document REP2-007)</i></p> <p><i>ES traffic data quoted by Stop the West Midlands Interchange within the Road Infrastructure Report does not match the submitted information. The correct, and submitted, data is included in Table 15.1 of the Transport ES Chapter (Document 6.2, Chapter 13, APP-053).</i></p> <p><i>The Transport Assessment does not include an assessment of the impact of</i></p>
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<p>increased traffic on the highways and village road network in the area and not as the applicant proposes, reduce it, whilst bringing no, or only marginal benefits in the form of modal shift.</p> <p>The proposed weight limits on a number of country lanes are not enforceable and are likely to be ignored.</p> <p>There is a significantly increased risk to the safety and wellbeing of local residents from increased carbon emissions, light, noise and heavy traffic on unsuitable roads and the consequential rat-running.</p> <p>An additional 20,000 approximate vehicle movements per day would be generated with the majority predicted to use J12 of the M6. All traffic will have to use the A5 (de-trunked in parts) & A449.</p> <p>The applicant has failed to demonstrate the effects that perturbation of these very critical arteries will have on the surrounding village roads. The volume of night time traffic that will arise as set out in Table 13.25 of the ES (with knock on consequences for noise) is not immediately clear from the transport data presented and should be explicitly set out within the TA, with appropriate cross referencing to the ES. Table 13.30 of the ES summarises 18 hour traffic flow increases. i.e. 6am to midnight. Since Table 13.25 sets out the traffic increase for the night time period there is currently no clear assessment of the night</p>	<p><i>night time traffic. The Transport Assessment considers highway capacity and looks at the peak times of the day when overall traffic flows are highest and these are during the daytime between 0800-0900 and 1700-1800. Highway mitigation, if required, is developed for these flows. At night-time, background traffic is much less so any mitigation developed for the higher daytime flows will also be suitable to mitigate any perceived highway capacity impact at night. The greatest impact from night time traffic is noise generation and this is assessed within the Noise and Vibration chapter of the ES, (Document 6.2, APP-046).</i></p> <p>Group's Response:</p> <p>It is a fact and we have written evidence (Stopthewestmidlandsinterchange Report 3 Roads Infrastructure Para 5.0) that freight lorries use the A5 west of Gailey as a short cut to and from the A41/Telford to and from the M6 North and do not use the M54 due to reasons appertaining to carbon footprints. HGVs do not obey the speed limit especially those travelling through the night and have been seen to perform dangerous manoeuvres (overtaking on double white lines). There is residential evidence that with 44 tonne HGV's they often cross over the double white lines in Weston, which is extremely narrow and when 2 HGV's pass each other in this area, they clip each other's wing mirrors. As per government quotes prior to the M54 being built "to walk through the village of Weston, is like taking a walk in the valley of death." In fact this is the case along the whole length of this stretch of road.</p> <p>There are no suitable diversion routes along this stretch should incidents occur and, as per photographic evidence sent recently with the M54 closures, the area becomes gridlocked when there are closures or incidences on the M54. The continual stream of traffic, mainly HGV's 24/7 can be demonstrated to be extremely disruptive, cause sleep disturbance through the noise level, speed and poor road surface. The Group note that the A5 West of Gailey has been highlighted as a secondary route for HGV's and state that it is highly inappropriate for HGV use. A recent Amey inspector (inspecting potholes) stated that they would not stop to inspect some of them because the road is so narrow and unsafe to pull over or stop.</p> <p>The Group contend that the lorry ban should be extended to this stretch of the A5 as well as on the A449 through Penkridge to J13, as we believe that</p>	<p><i>night time traffic. The Transport Assessment considers highway capacity and looks at the peak times of the day when overall traffic flows are highest and these are during the daytime between 0800-0900 and 1700-1800. Highway mitigation, if required, is developed for these flows. At night-time, background traffic is much less so any mitigation developed for the higher daytime flows will also be suitable to mitigate any perceived highway capacity impact at night. The greatest impact from night time traffic is noise generation and this is assessed within the Noise and Vibration chapter of the ES, (Document 6.2, APP-046).</i></p>
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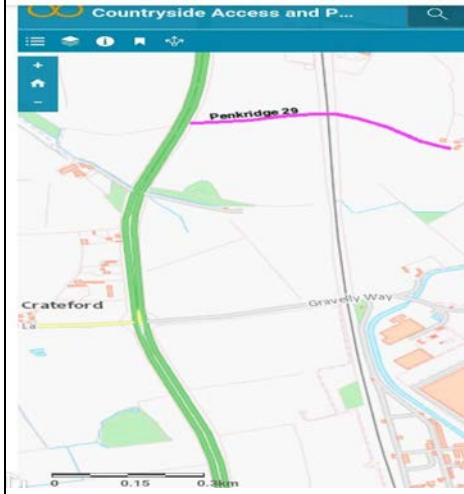
	<p>time traffic impact (between 12-6). The Applicant should consider providing an assessment comparing traffic increases for different periods of the day, evening and night rather than time averaging the increases across the 18 hour period.</p>	<p>HGV's using WMI should be directed to use the A5 to J12 M6 and the A449 towards Wolverhampton and the M54. Alternatively the Group seek written assurances that the Noise Insulation Scheme will be available to access by all the residents along the entire stretch of the A5 between Gailey and the A41, should there be inappropriate use of this stretch by WMI HGV's This will be a 24hour operation therefore traffic will be continuous day and night this will also include shift workers.</p> <p>The West Midlands Freight Strategy is referred to in the HGV management plan above and states the following: Encouraging future SRFI development: We will work with the appropriate Planning Authorities within the wider West Midlands region through the Duty of Cooperation and through appropriate LEPs to ensure that:</p> <ul style="list-style-type: none"> • Potential SRFI locations are identified and safeguarded; and • Planning and DCO applications for SRFI are encouraged and supported where relevant criteria are met and where there is real potential for rail freight use. <p>We already know that WMI does not form any part of local LEP strategy. Further nor does it establish very special circumstances to be developed on green belt land.</p> <p>From the SWHGVMP 5. "It should be noted that the premise for the SRFI is to provide all the elements for a successful facility. This in turn will create the demand over time for rail use. Consequently, it is anticipated that whilst some operators may initially be proportionally biased towards HGV's following relocation from elsewhere, there will be a shift from HGV to rail use as each operator determines a strategy that allows them to benefit from the opportunities that the Interchange offers."</p> <p>This paragraph is of great concern as the rail should be developed first and should not be based upon anticipation.</p>
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	<p>Tourism & Leisure Report</p> <p>The Tourism & Leisure Report outlines an objection to the proposed development based on its potential impact on local tourism and leisure facilities. The Report provides a summary of the tourism & leisure facilities in the local area.</p>	<p>Applicant's Comments: <i>The Report is noted. Chapter 14 of the ES (Document 6.2, App 052) sets out the Proposed Development effects on businesses, organisations, clubs and tourism.</i></p> <p>Group's Response:</p> <p>No amount of mitigation outlined in the ES will make up for the impact that this development will have.</p> <p>NPSNN 5.158 – The visual effects on sensitive receptors such as local residents and other receptors such as visitors to the local area will far outweigh the benefits of this development.</p> <p>NPSNN 5.166 – Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements.</p> <p>NPSNN 5.174 – The proposal does not contribute to protecting and enhancing our natural, built and historic environment, it does not make effective use of land, it does not use natural resources prudently, it will not minimise waste or air pollution.</p> <p>The social objectives have been ignored or undervalued in the supporting documentation for the proposed development.</p> <p>The local area has a diverse and distinctive environment, which is highly valued by local residents and visitors to the area. It has numerous attractive villages and hamlets set in lovely countryside. It is also an area with open spaces and a wealth of habitats for wildlife, heathland, woodland and waterways. There are a number of historical houses which are always popular with visitors.</p> <p>The ES Chapter 14 makes no reference to the South Staffs Tourism Strategy 2014-2017. The Tourism Economic Impact Assessment 2012 indicated that</p>
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		<p>the total number of trips taken in South Staffs reached 2.3 million, generating an approximate spend of £103 million to the local economy and local business. This equates to £9 million being spent in the local economy, the assessment also indicated that tourism supports approx. 2134 jobs.</p> <p>The ES assessment chapter 14 (14.214) states that: “The Proposed Development will have no direct effect upon the AONB landscape (yet it will have an influence over its very south-westerly extent and over the views to and from the AONB landscape.) The influence of the Proposed Development will be limited to the south- west corner of the AONB and the proposals will be one of a number of active and large scale infrastructure and development within view (including the settlement of Cannock, M6 Motorway, Veolia ERF, Rodbaston Wind Turbines (temporary infrastructure) Four Ashes Industrial Estate etc.) so effects will not be significant in the wider context.”</p> <p>The infrastructures mentioned above do not have the visual impact that this proposal will have and are not mentioned in the Report referenced below. What the report does state is the following: Cannock Chase AONB was designated in 1958 under the National Parks and Access to the Countryside Act 1949. It is the smallest AONB at 68km2 (26 square miles). Its 13 parish and town councils fall into four districts and one county local authority. The area includes three Local Nature Reserves, as well as two working quarries and a wide range of historical features.</p> <p>Therefore Hatherton and Huntington parish councils fall within in the AONB and will be directly affected by this development.</p> <p>Ref: Cannock Chase Area of Outstanding Natural Beauty Management Plan 2014 – 2019. Cannock Chase is one of 46 designated AONBs in England, Wales and Northern Ireland. Their collective qualities, alongside those of National Parks, make up the finest countryside nationally.</p> <p>Vision Statement By 2034, Cannock Chase Area of Outstanding Natural Beauty will be an enhanced area of national and international importance in terms of landscape beauty, wildlife and cultural heritage, centred on its heaths</p>
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	<p>and woods. Improved management of the whole area will connect the AONB to its surrounding landscapes, biodiversity and people. Conservation and enhancement programmes will bring about a better quality of life for local communities and visitors. Habitats; biodiversity; geodiversity; public access for quiet enjoyment; understanding of the area's fragility and importance; and positive visitor behaviours will continue to thrive under a plan for a balanced and sustainable AONB landscape.</p> <p>During the 2009-14 Management Plan period National Character Area profiles were developed by Natural England.</p> <p>The National Character Areas identifies three principal environmental opportunities, all of which are relevant to this Management Plan but particularly SEO 3:</p> <p>SEO 1: Expand lowland heathland to increase habitat connectivity, improve resilience to climate change and improve water quality.</p> <p>SEO 2: Manage, enhance and expand the network of green infrastructure, such as woodlands, restored mining sites, parklands and canal routes, to increase biodiversity, access and recreational use and increase understanding of the area's rich industrial heritage, particularly geodiversity.</p> <p>SEO 3: Conserve and enhance the essential character of this varied landscape, which includes the Cannock Chase Area of Outstanding Natural Beauty, the Forest of Mercia and the urban conurbation of the Black Country, to maintain food and timber production where possible; enhance landscape, sense of place and tranquillity; and increase resilience to climate change.</p> <p>Please note this annual event:</p> <p>https://www.facebook.com/100002839719612/posts/192020873147099?s=1404555293&sfns=mo</p> <p>In respect of Penk 29, this is currently used by local people on a daily basis to</p>
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walk their dogs and will provide an important and easier more direct route for the residents in Crateford Lane to be able to access the Croft Lane community park should the development go ahead.



Wrong Location Report (REP2-167)

This Report explains the reasons why the Stop the West Midlands Interchange Group believe the Site is not an appropriate location for an SRFI. The Report explains the physical and environmental constraints that the Group believe make the projects location both unsuitable and damaging.

Applicant's Comments: *The Report is noted. The Planning Statement (Document 7.1A, APP-252) presents the information necessary to review the Proposed Development within the context of planning policy. The Planning Statement explains the rationale for the development and includes a detailed explanation of how the development complies with relevant policy, including, in particular, the National Networks National Policy Statement. The Alternative Sites Assessment (Document 7.2, APP-254) assesses the alternative sites that have been considered in selecting the site of the Proposed Development and demonstrates that the WMI Site is the only realistic option to develop a SRFI within the area of need whilst meeting the locational requirements of the NPS. Appendix 6 (REP2-011) to Document 10.1 submitted at Deadline 2, responding to ExQ1.2.10 also considers alternative sites raised in Relevant Representations.*

		<p>Group's Response:</p> <p>The Applicant's answer side steps our point completely. The alternative sites assessment is not comprehensive and the "area of need" seems to be defined by the Applicants land ownership rather than the policy mentioned need of London and the South.</p>
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FURTHER RESPONSE AND EVIDENCE

With reference to the following report: <https://www.nic.org.uk/wp-content/uploads/CfE-with-cover-and-contents.pdf> Future of Freight Call For Evidence Dec 2018. Page 165

We note the applicants apathy for the NPSNN stating the following: The National Policy Statement for National Networks attempts to highlight the case for the economic benefits of new road and rail freight projects, but is limited in its ability to encourage new projects.

Their lack of response to

3. What effects does congestion have on the efficiency of eight movement and emissions? **Applicants Response** N/A

3.1. How does congestion impact upon the productivity and economic contribution of freight? To what extent does congestion affect changes to mode, time or other freight choices? **Applicants Response** N/A

3.2. How does congestion affect the environmental impacts of the movement of freight? **Applicants Response** Congestion increases the impact of freight movements on the environment. The use of rail freight with 15 times lower NOx, 90% lower PM10 emissions and 70% lower CO2 levels per tonne of freight than road should be further encouraged.

This of course is true, but not 6 years + after development of the warehousing, if the rail should ever be developed that is.

4.1. Are there efficiencies within freight management and distribution practices that could help reduce the CO2 and NOx emissions from freight? **Applicants Response:** The wider development of a network of SRFIs would help to improve the management of freight across all modes and reduce the impact on the environment by being able to have the volume and scale to commit to more rail movements.

Of course this will not be true of WMI because of the incapacity of the rail and most of the warehousing not being rail connected and won't be for a number of years.

In the applicants further comments in the above report **page 167** they state the following:

A significant part of the future rail freight demand is dependent on the quality and locations of proposed SRFI that are transforming logistics operations. These infrastructure projects require continued official support in the medium term to achieve better efficiencies and productivity from supply chains by basing the logistics operations close to conurbations and the necessary infrastructure thereby removing extra road trunk legs.

WMI is the first SRFI proposed on Greenbelt, is not close to a major conurbation and does not have the necessary infrastructure therefore increasing extra road trunk legs.

The applicant also state: Research by Campaign for Better Transport on behalf of Department for Transport showed that expansion of rail freight

could have a significant impact on current and projected congestion on the roads in those corridors (A14, A34 and parts of the M6).

Therefore with the development of WMI with and without the rail infrastructure this will cause congestion on the Motorway and SRN.