

## **THE COLLECTIVE OF PARISH COUNCILS AGAINST THE WEST MIDLANDS INTERCHANGE (WMI) TR050005 POST HEARING SUBMISSIONS –**

**OUR REFERENCE 20015248**

### **VIABILITY**

The Collective requires justification of the need to cross the recognisable physical boundary between the triangle of land formed by the boundaries of the A5, the A449 and Vicarage Road/Station Road and the hamlet of Calf Heath. The original application related to 250 hectares with only two entrances; one from the A449 and one from the A5. This application was alleged to be viable at that stage. However, a further modified application included an additional 50 hectares of land in Calf Heath. If the original application for 250 hectares was viable what very special circumstances come into play to justify the further 50 hectares.

The inclusion of the 50 additional hectares will have a substantial and adverse impact on traffic flow in this area as a whole. The detrimental impact will not only be suffered by Straight Mile and Station Road but also by the narrow lanes which lead to and from those roads to the villages of Shareshill and Saredon.

### **PUBLIC SAFETY - INEVITABILITY RAT RUNNING**

The Collective is deeply concerned that, despite the fact the need to increase the size of the proposal site is considered to be highly questionable in terms of assuring the viability of the proposal, that it still forms part of this application. What justification can possibly outweigh the need to protect the safety of cyclists, walkers and horse riders.

Unfortunately, evidence is already in existence relating to a fatal cycling accident on this stretch of road in June 2017. Please see below: -



The Collective's fears for public safety are even more exacerbated by proposals which have been mooted regarding the closure of part of Station Road (close to the railway bridge). This course of action will also impede cyclists from accessing the country route from Shareshill to the larger Parish of Brewood.

The Collective holds deep concerns that rat running will inevitably occur through the lanes which lead to the adjoining villages of Saredon and Shareshill. The lanes referred to are of narrow and tortuous alignment and will not safely accommodate the level of traffic this proposal will generate.

The encouragement of additional traffic onto roads at the rear of the application site, merely to satisfy an increase in the size of this proposal, is unacceptable. Moreover in the obvious absence of any very special circumstances to support the inclusion of an additional 50 hectares again where is the justification to jeopardise public safety?

It must also be taken into account that the 50 hectare extension will not be directly linked to the rail hub and will also require the use of Tugmasters to transport goods across Vicarage Road. Vicarage Road represents a physical boundary providing protection of the Green Belt and should surely remain so.

### **BIODIVERSITY**

The 50 hectare extension is proposed to be utilised in part as the Country Park which, as quoted by the applicant, is the core mitigation for the protection of the existing wildlife habitat; however, this is not to be delivered until the final phase. How can this be acceptable? The Country Parks should be in place from the outset in order to ensure that the much needed continuity of environment is available to important wildlife (including already endangered species) on the site. The Country Parks should be incorporated into the original application site and constructed at the outset in order to afford the required protection to wildlife.

### **IMPACT ON HIGHWAY NETWORK**

The Highway Authority does not seem to have considered the regular disruption to traffic each time there is an accident on the M6. The stretch of motorway between Junction 11 and 13 and the M6 Toll Road is described as one of the busiest stretches of motorway in the Country. Inevitably this traffic will increase even more when the M54/M6 Link Road is connected to the newly constructed Junction 11 of the M6.

### **PHASING OF DEVELOPMENT**

The Collective is of the view that rail supremacy should prevail; it is imperative that the installation of the rail connection takes place prior to the construction of the warehousing element of the proposal. This course of action is essential in order to ensure against a scenario which has the potential to lead to loss of valuable Green Belt merely to support warehousing; a situation which could easily arise should any unforeseen financial constraints prevent the construction of the rail connection. Clearly, allowing this to happen would fly in the face of the very reason why a Green Belt site is being considered for a facility of this nature at all.

The Collective is cognisant of the thrust of the applicant's argument. However, it is clear that the applicants are reliant upon the fact that other facilities of this nature have included the construction of 25% of the warehousing development prior to the installation of the rail connection, however, those sites were not in Green Belt.

### **DETRIMENTAL AFFECT ON SURROUNDING LANDSCAPE**

The sheer scale, height and overall mass of the proposed warehousing development cannot be mitigated when viewed from the Toposcope at Shoal Hill Common or from St. Mary and St. Luke's Church in Shareshill. The applicants refute this assertion, as it is their belief that there are many wooded areas which would mitigate the impact on important local views. Unfortunately, the applicants appear to be reliant upon a natural mitigation which will no longer be in existence once the proposed mass removal of trees has taken place. The wholesale destruction of the wooded areas on the site will not only urbanise the landscape but will also encroach directly into the open countryside and significantly change its appearance once the full scale of the warehousing development is actually revealed.

Reference has been made by other agencies to the need to protect the setting of the local Area of Outstanding Natural Beauty. These views are particularly relevant in this instance as the elevated plateau of Cannock Chase gives long vistas over the farmed vales and countryside of the Midlands from within it.

Cannock Chase is prominent as a wooded skyline from many surrounding areas and policy is in place (LCP8 – AONB Management Plan 2019-2024) to protect and enhance the setting of the AONB to ensure the survival of those special qualities. The Collective feels strongly that these factors need to be recognised when determination of development and land management proposals with the potential to affect an AONB is taking place.

### **TRAFFIC MANAGEMENT PLANS**

The applicant has touched briefly on the proposed preparation of a Traffic Management Plan in order to avoid traffic generated by the WMI from using the route through Penkridge to join the M6 at Dunston. The Collective is of the view that any Traffic Management Plan will be wholly unenforceable. The driver of any vehicle leaving the site will have the right to detour to a destination of their own choice, thus negating any regulation contained in the proposed TMP.

The Collective has observed through attendance at the associated hearings that the proposal to impose a Traffic Management Plan is being regarded as aspirational at this stage; an observation which the Collective is fully supportive of as there does not appear to be any background evidence to support its effectiveness.

### **PROPOSED CUSTOMER BASE RATIOS**

The Collective is extremely concerned that the applicants are intending to allow delivery and collection services to 40% of distribution businesses based outside the West Midlands in order to service companies in other parts of the country. These companies may have an existing Interchange closer to them or may well have an SRFI due to be built closer to their own location.

It should be borne in mind that Government Policy aspires to cut down the need to travel long distances reducing congestion, pollution and greenhouse gases which, with respect, underlines the whole purpose of using rail to serve the West Midlands to provide distribution to the conurbation.

In light of the above The Collective feels strongly that by encouraging 40% of users to onward deliver to longer distances outside the West Midlands the applicant is defeating the object. Moreover, this course of action could potentially lead some of those businesses to relocate to the West Midlands Interchange, thus potentially displacing employment from areas with high unemployment; unlike South Staffordshire which has low unemployment figures.

All these factors weigh heavily against the very special circumstances required to allow development within 300 hectares of much valued green belt.

### **CONCLUSION**

The Collective wishes to emphasise the fact that it remains steadfastly against this proposal in its entirety; specific reference in this document to the additional 50 hectares to the opposite side of Vicarage Road should not be deemed in any way as an indication that the original proposal would be acceptable.