

With regard to the West Midlands Interchange.

Dear Paul Singleton,

I am a resident of Coven and attended the site visit and hearings for the West Midlands Interchange from the 3rd-6th of June 2019. Following this I would like to submit the following comments:

Need for rail freight.

It appears evident that rather than responding to a "...specific pressing local needs for a rail-served facilities and warehousing.." (1) that Four Ashes Limited are trying to generate and justify a need. There are already 3 rail freight terminals within a 40 mile radius of Birmingham all with good motorway and road links. Birch Coppice at Tamworth operational from 1997, Telford International Rail Freight Park (TIRFP) operational from 2009 and Daventry International Freight Terminal (DIRFT) operational from 1997 and built in 3 stages.

On 12th June 2019 all 3 terminals had vacant warehousing either for sale or rent. Birch Coppice had 282,124 sq ft. TIRFP at Donnington advertises 'The largest shed in Telford is on the market' with 75,705 sq ft of warehousing and office space with ample parking spaces. In addition there are other units totalling 20,412 sq ft as well as 2 plots of land adjacent to the site for commercial development. It is well known in the area that this site is underused. I understand that DIRFT is one of the largest and most successful rail terminals in the country yet it currently has 8 units for rent totalling over 10,000,000 sq ft. This terminal is already linked with the West Coast train line and is located by junction 18 of the M1 motorway in close proximity to the A5, A14 and M6.

Four Ashes Ltd. claim the proposed site is "...uniquely situated to meet the long-standing need for a large scale SFRI in the area. " (2) Where is this need? I still haven't heard substantial evidence to this effect. This is duplicated rhetoric as Birch Coppice claim their development "...will provide the infrastructure vital to support this area's continued success." (3).

National Statistics by the Office of Rail and Road show freight rail usage has declined in recent years Q4 Statistical Release for total amount of freight lifted is as follows: (4)

- 2018 - 19 saw a 1% increase compared to the previous year.
- 2017 - 18 saw a 5.6% decrease compared to the previous year.
- 2016 - 17 saw an 8% decrease compared with the previous year.
(the lowest recorded value since 1984-85).
- 2015 - 16 saw a 20% decrease compared to the previous year.
(contributed by a drop in coal transportation).
- 2014 - 15 saw a 5.5% decrease compared to the previous year.
- 2013 - 14 saw a 5.6% increase compared to previous year.

To me these figures do not constitute any justification to construct another intermodal freight terminal in this area in addition to the existing facilities. With the requirement of a minimum 25% site occupancy before the installation of such a terminal there is local concern that this will never come to fruition and we will have an underused warehouse site that will still generate more HGVs on our road network.

Accessibility and Transport

As you are aware this is a topic of grave concern to many local residents. The A5 as the only alternative route to the M54 east to west and at present is very busy with queues at major junctions. I returned from Tamworth to my home in Coven on 11th June 2019 along the A5 at 4pm. From Brownhills to the A449 at Gailey roundabout I was in slow moving traffic, much of which was HGVs.

It is interesting that as we crawled along the A5 that the M6 Toll Road had very little traffic. Another project deemed essential but underused. Aimed to ease congestion on the M6 but it has not worked the same as it would appear that greater rail freight provision is not working for removing freight from the roads.

With the WMI proposal, the i54 extension, the proposed development of ROF Featherstone and the new Outlet Shopping Centre at Cannock even with the highway improvements planned the area's roads will remain overloaded. This morning, 14th June 2019, there has been an accident on the M6 at 6.18 am closing all carriageways northbound on the motorway between junctions 13 and 14. The estimated time for re-opening the M6 was 1:45pm. The AA have issued warnings that there are major delays at Gailey roundabout. No assessment appears to have been carried out as to how these frequent incidents impact on the area.

You have heard the opinions of how the proposed one-way system for Crateford Lane and no right turn into Station Drive will impact on local residents and The Four Ashes pub. Under the proposed road changes cyclists wishing to turn right into Station Drive will have to continue to the new roundabout at the junction of Crateford Lane and Gravelly Way and double back. Isn't it highly likely that they will dismount at the traffic lights on the A449 junction with Station Drive and cross over? There is no pedestrian crossing at this busy junction so there is a potential for accidents.

Socio-Economic

Four Ashes Ltd. claim that this development “..will bring significant sustainable social and economic benefits to South Staffordshire...” (5) In relation to employment it was stated that the applicants are looking to draw employees from Wolverhampton, Walsall and Cannock only one of these areas being in our county. As regards to my own locality of Brewood and Coven the unemployment figures for April 2019 were 1.2% and for South Staffordshire 1.6%. I have still to hear what the social benefits are.

Air Quality and Carbon Emissions

The WMI site will produce a concentrated area of carbon emissions from HGVs and tugmasters as well as on the local road system. Dust from the construction and operation of the site will add to poor air quality.

Noise and Light Pollution

I feel that light pollution has been skimmed over. Some lighting will be high. Gantry cranes will have lights that will be moving. How can the applicants ensure that site operators show consideration? Noise mitigation may be in place for properties by the development but noise pollution mainly occurs outside and affects the larger community. WMI is intended to be a 24 hour working site. Sound travels quite a distance. The express trains already on this line can be heard in Coven. I lived on a housing estate close to the Bescot (Walsall) marshalling yard dealing with freight and it was very noisy especially at night. What happens if noise exceeds accepted levels?

Landscape and visual effects

This development will be at a gateway into our community and into South Staffordshire. With up to 8m mounds and 30m warehousing along part of the A449 and the mainline rail, canal and local buses running through this site it will hardly be attractive to visitors or potential house purchasers. Which leads to the question, if some of the 8500 additional workers have to relocate with their firms to the WMI, what housing provision is available?

Further afield the buildings will be seen for many miles around impacting on the environment and skyline. I believe that the roof of the present Veolia site was supposed to be green but it is a light

colour that reflects the sun that can be seen in Brewood. Even when assurances are given they are not necessarily carried through.

All 3 railfreight terminals referred in this letter were constructed on brownfield sites whereas the WMI is taking up a large proportion of our Green Belt. Birch Coppice is built on a former British Coal colliery "...transforming a blot on the landscape." (6) WMI will replace beautiful countryside with a blot on the landscape.

Mr Piers Monckton, who I believe is currently the Chairman of Staffordshire CLA and has a major stake in the WMI project is against the proposed HS2. He has stated "Staffordshire has been the sacrificial lamb of HS2. The scheme adversely impacts broad swathes of the county but brings precious little in the way of benefits." (7) I would use his own words for this development.

Ecology and Nature Conservation.

It would appear that both the County Council and Four Ashes Ltd. have consulted ecology experts about the site but has an independent ecology and conservation expert made an assessment? That the conservation and community parks are being developed late in construction may lead to the extinction or reduced numbers of species. Has there been investigations/studies into wildlife survival alongside major operational industrial sites?

In conclusion I do not feel that this development will prove to be in the best interests of the residents and workers in this part of South Staffordshire. It will not enhance tourism, there is no social benefit and economic benefit is questionable. Should this project be approved it could well set a precedent for commercial building on the nation's Green Belt.

Yours sincerely,
Mrs Janis Bradshaw



References:

- (1) (2) (5) West Midlands Interchange website. <http://www.westmidlandsinterchange.co.uk/>
- (3) & (6) <https://www.business-live.co.uk/business/business-park-ideal-freight-terminal-3997587>
- (4) Office of Rail & Road orr.gov.uk
- (7) CLA website. Posted 25th May 2016
<https://www.cla.org.uk/your-area/midlands/regional-news/new-chairman-cla-staffordshire>