

From: [REDACTED]
To: [West Midlands Interchange](#)
Subject: ExQ3 TR00005 response to questions
Date: 03 August 2019 00:18:01

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i) The applicant's evidence is that there is a need for an element of warehousing to be constructed and occupied in advance of the completion of the RT, both to help fund the rail infrastructure and to ensure occupier demand for the rail services once they are available. Having regard to that evidence, do the parties consider that there are reasonable grounds for allowing up to 186,000 sq. m. of the proposed warehousing to be built and occupied prior to the opening of the RT?

Response: Currently providing services to the NHS, I am aware that many services within the NHS operate Capacity and Demand models. Demand has to be proven before capacity can be increased, otherwise money and resources are wasted. Is there anywhere in the applicants documents that evidences what the demand is for use of the warehouses? Can we see the list of clients that have expressed an interest in this facility? And then from those clients, what their commitment will be to use the rail link?

If none of this can be evidenced then this application is based on estimations and guesswork, therefore to allow 186,000 sq. m of warehousing to be built in green belt is most unjust. Clearly the applicant is not certain of this demand as there is no guarantee that the rail link will be built and will be relying on the revenue from the occupation of these warehouses to build the rail link. The applicants modelling and paperwork is all theoretical but once this is built, if demand is not there, the destruction of green belt and leisure facilities cannot be undone.

(ii) Without the flexibility sought by the applicant, a simplified form of Rail Requirement 4 would possibly read as follows:

“The undertaker must complete the rail terminal works prior to the earliest of—

*(a) the occupation of more than 186,000 sq.m of warehousing; or
(b) the sixth anniversary of the first occupation of more than 47,000sq. m. of warehousing”.*

If there are reasonable grounds for allowing some warehousing to be occupied prior to the completion of the RT, would this simplified Requirement 4 provide the necessary certainty as to the delivery of the rail infrastructure?

Response: No, where is the evidence that there is demand for these warehouses? How long will it take to occupy even 47,000sq m in the first instance and then 6 years on top of that? Quite simply the applicant needs to evidence the demand. No demand = no funding = no rail terminal. Where are the potential clients submissions to the PI in support of this development?

iii) Do the parties agree, as a matter of principle, that the Rail Requirements should provide for a subsequent change to the timescale for completion of the RT to be approved either by the LPA or by any other statutory body/authority?

Response: The timescale for completion of the rail terminal should and needs to be shorter than what has been proposed. If a shorter timescale cannot be achieved, then clearly there is not a need for this facility in South Staffs.

Anita Anderson

Sent from my iPad