

From: [REDACTED]
To: [West Midlands Interchange](#)
Cc: [REDACTED]
Subject: Fwd: TR050005 - West Midlands Interchange - Deadline 7 submission
Date: 07 August 2019 13:27:03

Dear Mr Singleton,

This is my last representation on the proposed West Midlands Interchange, so I would like to take this final opportunity to address my concerns relating to this project, and also highlight areas which the applicant still appears to have not addressed.

The proposals for Station Drive, where I live, are wholly unsatisfactory and seem to go against the intentions of FAL to keep traffic on the strategic road network, I.e. the A449, A5 and M6. I have long argued that an access point for the site should not be located on Vicarage Road as this will encourage a high percentage of vehicle movements down Station Drive from the Vicarage Road / Straight Mile area of the site to the A449 for workers located in Wolverhampton or Walsall.

The applicants and yourself are well aware of the existing bottleneck at Station Drive during the two “office peaks”, with vehicles trying to access the A449. It is common to have traffic queued from 7am to 9am, and from 4pm to 6pm or sometimes later, especially if there are issues on the M6 from anywhere between J9 and J12/13. The shift pattern and volume of expected workers will create another 4 peaks at least through the day, as well as exacerbate the existing problems.

I appreciate that the proposed right turn ban may reduce traffic heading towards the site (eastbound) from that section of the A449, however that traffic has never been a problem and has always flowed freely when exiting the A449 heading towards Vicarage Road. The issue is always related to the traffic heading westbound down Vicarage Road, where no additional mitigation has been proposed to ease the flow of the additional traffic, which, with my knowledge of the local area, will be more significant than the suggestion of FAL in their transport document.

On this topic, I have questioned on multiple occasions the validity of the traffic count performed at the junction of Station Drive and the A449. I would like to draw your attention to the fact that this has never been addressed in any of the applicant’s responses.

Reading the proposal outlined by NewRiver and the proposed stopping up of Station Drive, I am in full agreement with all of the aspects raised relating to the site and would be one of many residents of Station Drive, who will be impacted, who are in support of this proposal. Four Ashes, unlike Croft Lane and Calf Heath, is seeing no direct amenity to

residents such as a proposed green area in the vicinity, so this may go some way to appeasing local residents who are going to be impacted heavily by this project.

As a resident [REDACTED], we will be impacted heavily by the operation of the rail facility. Again, after repeated requests for information as to how the disturbances in terms of light and noise pollution may impact us, we have been provided with very poor detail. This indicates the developers don't seem to fully understand the impact the proposals will have on local residents, and I am not confident that the proposed mitigation will be of a suitable level to ensure that we can continue to live our lives in peace.

In terms of the newly gained evidence regarding the introduction and phasing of the rail infrastructure, it is my belief that this is wholly inadequate for the type of proposal put forward. The suggestion of the applicant to only introduce this after 6 years, or 25% of site occupancy, will lead to 25% of occupants at least needing having no reliance on rail, which is surely the sole reason this scheme is being considered. Learning that interested occupants will not have a premium applied to their rents to be located on a site with rail infrastructure also implies that occupants will come, not specifically for rail occupancy, but rather for an available large warehouse. It is my belief that if a project such as this is to be permitted in the greenbelt, the rail link must be introduced as an integral part of the scheme at a much earlier stage, preferably before any occupants are found.

It is also worth pointing out that on the new Bericote scheme which will be alongside the proposed development, there is still signage up on the A449 advertising warehousing on the scale of those proposed by FAL – I believe in the region of 500,000 sq ft from memory. I shall take a photograph this evening and send as a separate submission. This indicates to me that there is no demand in the area for warehousing of this size on a single unit scale, let alone a further 15+ units of this size. The intention to introduce rail infrastructure to this size at this location is not secret, so it is surprising that this site has not yet been taken by somebody who may be interested in taking advantage at a later date.

The applicant has stated, in the last hearings regarding the scale of the project, that the rail terminal cannot be brought in any sooner in order to be financially viable, and that the scale of the site as a whole is also needed at the proposed level to ensure viability. My suggestion here is that if the possibility of viability is this narrow, the project is not correctly planned to ensure it will be a success. We are looking at destruction of greenbelt here, which must only be done under extremely special circumstances. If the project cannot guarantee to be financially and commercially viable, and would potentially be at risk of not being completed, this does not warrant incursion in to the greenbelt.

I also draw attention to the comments raised by Inglewood regarding the scale of the project from their Deadline 2 Submission - Summary of Written Representation - Owen Land and Property. I understand that these comments are still valid and correct, which indicate that the scale of the project proposed by the applicant is excessive, especially for a development in the greenbelt.

The WMI proposals have substantially grown in the period from 2008 to 2016. FAL have provided no evidence to demonstrate that the proposals at 2008 should now be considered to be undeliverable.

1.8 In 2008 FAL stated that a site comprising 350,000 sqm of B8 accommodation “offers the size of site necessary to support a SRFI”.

1.9 FAL’s 2008 assessment of site capacity (350,000 sqm) included 84,000 sqm of B8 with existing planning approval.

1.10 In 2015 Kilbride’s published scheme site plan mirrored that of 2008.

1.11 FAL have not provided any documents to demonstrate that the site illustrated in 2008, or subsequently in 2015, should now be seen as undeliverable.

1.12 On a directly comparable basis (ie. with existing planning approval and proposed accommodation as referenced in 2008 and 2015) the WMI DCO proposals comprise 827,200 sqm of B8 development and extends to 297 hectares.

1.13 FAL’s Alternative Sites Assessment (ASA) sets a minimum threshold for “true alternative sites” at 60 hectares.

1.14 FAL have not demonstrated why the WMI is required extend to 297 hectares.

1.19 Review of existing operational SRFI’s, and proposed SRFI’s around the UK confirms that the WMI proposals are of an unprecedented size. Including the existing permitted development (84,000 sqm), development contiguous with the WMI will exceed the largest existing UK SRFI schemes (iPort, Doncaster and East Midlands Gateway) by some 267,000 sqm. (c.148% larger).

Our greenbelt may not be "picture perfect" as was implied at the previous hearing, especially when directly compared to some others, but it does provide an oasis of green in an otherwise (increasingly) urban area. The loss of this green space will set a precedent for the remainder of South Staffordshire’s greenbelt, where it is already acknowledged we are providing more than sufficient assistance to the West Midlands in terms of new infrastructure. To then hear that our greenbelt is potentially being sacrificed for 1 in every 3 lorries leaving the site to be transporting by road around the whole of Great Britain outside of the West Midlands, indicates to me that this is not an exceptional circumstance which warrants destruction of the green belt in this area.

Finally, as this is my last opportunity to voice my opinions on the project, I feel that the human impact must be considered here. After living in my current property for some 26 years of my life, before moving briefly away to Coven, my hope was to return to afford my young son the same life I had growing up. The first indication of the existence of this project arrived within days of obtaining my childhood home. To say we were, and still are, heartbroken is an understatement.

We have not chosen to live near a development such as this. Had the opportunity been afforded to us, and we had knowledge of the existence of these plans beforehand, we would not have made the decision to return. We are now in a position where we have no choice but to stay, given that the uncertainty around the impact of the project. When asked

at the early stages of the project, during a visit to my property, Mr Frost and his colleagues were unable to say they would be satisfied living in the vicinity of a scheme such as this. On this at least, we have the same opinion.

I thank you for your attention, and trust you to make the correct judgement.

Regards

Gareth Minton