From:
West Midlands Interchange

Cc: <u>nienquiries@planninginspectorate.ov.uk</u>

Subject: TR050005

Date: 07 August 2019 22:18:05

Dear Sir

I am writing reiterate my objections to the proposed West Midlands Interchange.

Strategic Rail Freight Site

The application is for a Strategic Rail Freight Terminal, as such the application is considered by the Planning Inspectorate, rather than local council planning department. Had the application been for multiple large warehouses on a green belt site it would have been considered by the local council and undoubtedly refused.

It would now appear that the applicant wishes pursue planning permission on the whole site but build the warehouses first to see if there is suitable demand before building the rail freight. Surely by the definition of their application for a strategic rail freight of national significance, the first part to be built should be the rail freight element and then see over a period of time if there is enough demand to build warehouses. At all times during the planning consultation meetings when this point was raised, Four Ashes Ltd maintained that there was sufficient demand to necessitate the rail freight and the large number of warehouses hence, there should be no problem with building the rail freight and a couple of associated warehouses first. They could utilise the local empty warehouse space in the meantime, without the need to build further warehouses until the need is proved. This would reduce costs and avoid unnecessary building on greenbelt.

If the application is genuinely for a strategic rail freight and not just a loophole the applicant is using to build a large number of warehouses on a green belt site, the applicant should have no issues with building and proving the viability of the rail freight over say a period of 5 years before building anything else.

There are currently many warehouses within a 3 mile radius of the proposed site which have been standing empty for a considerable time, in some cases years. If these are not being occupied what makes the applicant think that their warehouses would be occupied, as without the rail freight element they are no different to these other empty warehouses.

Clearly the rail freight may need a small number of warehouses, but if the rail freight is efficient the need would be minimal. The freight containers are watertight and the containers at the freight storage site near the Orbital Centre just 2 miles away are stored outdoors.

The rail freight depot at Telford is vastly under used so there is no justification to build another 20 miles away. Given the considerable number of warehouses and large employers in Telford if a rail freight terminal does not work there it will not work at the Four Ashes site. There is sufficient road access for the local companies to use the Telford site thus, negating the need for an additional rail freight site.

Creation of 8500 New Jobs

Throughout the whole process the applicant has used the creation of 8500 jobs to support their application. 2500 of these jobs will be construction jobs to build the rail freight terminal and the warehouses. If the rail freight terminal is not being built then this will reduce the number of construction jobs needed. The fact remains that the majority of these people will be self employed, or already employed by construction companies on other builds and this will not reduce unemployment figures.

If the applicant wishes to build the warehouses first to see demand, how can they say they will create 8500 jobs when the empty warehouses 2 miles away are not creating any jobs and there is a danger that the ones built in the guise of WMI will be exactly the same.

It would appear that the applicant can speculate all sorts of statistics to support their application, but when anyone challenges them the applicant dismisses arguments as having no proof. Surely the same rules should apply to both sides.

Noise Levels

I have concern regarding the noise level monitoring. When asked about the monitoring which had taken place in Stable Lane, I was initially advised that monitors were placed outside properties. When I asked how monitors could have been placed on private property without the owners knowledge, I was told that these were mobile checks.

The point I would like to make is that having physically visited two other rail freight sites and researched a number of others, there is no other site where warehouses of this size and quantity are built in such close proximity to residential dwellings. There are no cases where motorway noise would reverberate from the warehouses on to properties as it would in Stable Lane, Calf Heath, thus increasing the volume of noise considerably for the residents. Hence, how has the applicant monitored the noise levels in this area claiming that noise levels will not be excessive. Four Ashes Ltd have already stated that no residents will be compensated.

Location

National Rail reports indicate that smaller rail freight hubs are more effective. While one reason for choosing this site was said to be availability of land, it is significant that NR have a number of small sites suitable for smaller freight hubs available for sale.

In fact a similar situation arose in 2009 when Jaguar Landrover were looking for a site. The original site looked at was In the Birmingham area, which had all the necessary rail links, good public transport and avoided the 'last mile' of traffic. There were already many derelict warehouses surrounding the site. I am advised that the main reason for choosing the I54 site instead was it was cheaper to build on virgin soil rather than revamp the existing warehouses.

There are many sites with derelict warehouses and suitable rail links which have not been considered. Perhaps this is because the real reason for the application is to secure planning for warehouses on greenbelt with the rail freight being a side issue rather than the priority.

There are currently access roads for works traffic used by Highways England between junctions 13 and 14 M6, with adjoining railway lines. This is the same line that would be used by WMI. If this project is of such national importance then surely there would be no problem with utilising these existing M6 exits and building the rail freight and warehouses on this area of open farmland. The additional costs of this site would be negated by savings

made on the compulsory purchases of property required on the current site. This would considerably reduce traffic on the A5 /M6 Junctions. The land surrounding these exits is farmland and there would be minimal if any impact on dwellings is the area.

I do not feel that other sites have been fully explored, before being disregarded. In fact the only difference indicated between the current site and a site at Junction 13 was the availability of land. However, there is no evidence that any offer to purchase this land have been made, so how can it be concluded that it is not available.

There is a community park planned by the applicant on straight mile, is seen to be a sweetener for local residents. In reality this area of land was for a number of years in the 70's was a land fill site and is poor quality land which would require and expensive excavation to enable building on this land. Despite the land film licences issued no one seems to know what the size conceals.

There are still many issues surrounding this proposal and I trust that this application will be seen for what it really is rather than the smoke and mirrors being used by the applicant.

Kind regards Sue Worrall

Sent from my iPad