

Your Ref: TR050005

Interested Party – Reference 20015052

Final comments on the proposed development following consultation

Dear Mr Singleton,

Thank you for your work conducting the review of the application for West Midlands Interchange (WMI). It has been my first encounter with this process and I have been impressed with the robustness of questioning and gathering of information to support the decision, which I believe will deliver a well-informed outcome.

I have attempted to maintain an open mind to this development as a local resident. Whilst any loss of green belt is something we should attempt to avoid, the environmental and economic case for improving the use of the railway for freight is clear. As such the general principle of transferring freight onto the railway is one that I support.

However, the information produced throughout the consultation period has strengthened my initial view that this development should not be allowed to proceed.

As you close the consultation element of the process before making a final decision, I wanted to summarise my views as an interested party, and one who grew up and has lived in the shadow of this proposed development for over 40 years.

1 – This should not qualify as a Nationally Significant Infrastructure Project

The process being followed here is as a result of WMI being proposed as a Nationally Significant Infrastructure Project (NSIP).

I have been sceptical throughout this process that WMI appears to remove very little freight from the road network. The maximum number of 10 trains (quoted early in consultation) appears to have trended down during the course of this process to more like 6, and such low numbers appear to provide little opportunity to make a meaningful reduction in road freight. Particularly when you consider that the scheme proposed by Midlands Connect in Birmingham has a far more aspirational 36 trains per day which would satisfy much more closely the definition of NSIP.

As such WMI seems to barely qualify as an SRFI, and increasingly looks like a road connected warehousing development with just enough rail connections to enable it to be considered an SRFI and hence qualify as an NSIP.

The latter stages of the consultation have raised serious questions in my mind about the Applicant's commitment to rail, and to the concept of transferring freight onto the railway. The Applicant appears to have gone to great lengths to incorporate wording into the DCO and Rail Requirements to provide a number of scenarios whereby it would be relieved of the requirement to build the rail terminal, leaving us with a road connected warehousing development in the greenbelt.

For example, with a number of questions hanging over HS2, particularly Phase 2 to the north of WMI, there is a high likelihood HS2 will now not proceed. A key element of the HS2 business case is that it relieves capacity on the existing WCML to provide more local passenger services. It is quite clear that without HS2 there will be pressure to release the paths earmarked for WMI for passenger services.

It seems quite clear that the Applicant would be able to claim this as a matter outside of its control, thus releasing it from the obligation to construct the rail terminal.

This is just one potential scenario, but does clearly show that there is now a high likelihood (given the drafting of the DCO etc.) that the rail terminal will never be built. It seems more appropriate therefore that the Applicant submit an application for road connected warehousing in this location via the normal planning routes.

2 – Better locations exist

The applicant produced during the early stages of consultation the Alternative Sites Assessment (ASA) document, which on first read appeared to have been constructed to justify the chosen location rather than to genuinely seek out alternatives.

A factor used to disqualify a number of other sites is size. Linked to point 1), the amount of land required to enable a road-rail interchange is considerably less than the full WMI development. The Applicant has repeatedly indicated that the warehousing is required in advance of a rail connection to provide a viable business case, which suggests that the business case for rail freight at WMI is weak particularly as a result of its limited rail capacity.

However it is clear that without this constraint the road-rail interchange, occupying considerably less space than the full WMI development, could easily be built on a number of sites otherwise disqualified on the basis of size.

It feels inappropriate that a massive warehousing development should be required to fund the road-rail interchange element of this development, which then eliminates a number of available sites such that only one in the green belt is considered.

It would be more appropriate if the road-rail element of this development be considered on its own merits and as a standalone business.

Whilst the co-location of the M6 and the WCML clearly provides an advantage for this development, other sites exist within a reasonable distance that could provide similar connections. I am aware that these have been discussed as part of your consultations, however I am still of the belief that these are more viable than the Applicant continues to contend.

Furthermore, I also remain of the opinion that introducing so much additional road traffic on this section of the M6 would be counter-productive. The section of the M6 to the south of WMI is one of the most congested sections in the country, so adding additional traffic to it seems illogical.

I remain of the opinion that the objective of removing freight from the road network would be best achieved by placing RFIs either above or below the most congested stretch of motorway (i.e. Birmingham or Stoke) rather than slap bang in the middle of the congested stretch.

3 – The benefits case is weak and it will not deliver the benefits claimed

The business case for this development is clearly weak. The Applicant has stated that costs are such that a huge warehouse development is required to make the road-rail interchange viable, suggesting that the cost benefit analysis is low based on typical BCR analysis used in infrastructure.

Furthermore there is zero benefit to the district in which it is proposed.

With very low levels of employment locally, there is no need for a development of this scale. The Applicant has stated at various points in its responses that it believes it will provide opportunity for people to work more locally rather than further away. This view is significantly flawed.

A fairly rudimentary local demographic analysis would reveal that a large number of local residents (myself included) are employed in professional occupations to which they commute. Indeed surrounding villages such as Brewood are prime commuter villages for the West Midlands.

I personally found the suggestion, expressed during consultation, that residents may appreciate the opportunity to reduce their commute by taking advantage of the jobs created to be arrogant. The Applicant may believe that local residents employed in skilled, professional occupations yearn to give that up to work in a warehouse, unfortunately that is not the case.

The Applicant also significantly downplays the impact that automation will have within the logistics sector, and the effect this will have on the number of jobs it claims will be developed.

I note the citation by the Applicant of a report by McKinsey on the effects of automation in the sector. Specifically the points that **overall**, the number of jobs lost directly to automation is expected to be equalled by the jobs created developing that automation, for example in software development. As someone who works in the supply chain profession, I am highly familiar with the report.

The Applicant has, deliberately or otherwise, missed a key point of this assessment which is that the additional jobs created are unlikely to be created in the same location as the logistics sites themselves. Indeed, many of the jobs created in automation are being delivered offshore in specialist IT centres of excellence.

It is highly unlikely that the technical and specialist jobs alluded to by the Applicant will ever be created in South Staffordshire, as there is no requirement to have them co-located with the warehouses themselves.

Indeed, if this were a realistic prospect, I would have expected the applicant to have ensured that significantly more office space than they are proposing be included. This suggests that they either don't believe their own argument that significant technical or engineering jobs will be created locally, or do not sufficiently understand the issue to make those assertions.

In either case, it is clear that the development offers little realistic chance of delivering the number of additional jobs claimed, or delivering any benefit to the local population despite destroying a location that does provide intangible benefit to residents in the form of countryside and green space.

4 – It will significantly worsen congestion locally

A major concern to residents is the significant detrimental impact that this development will have on the surrounding country lanes and roads, unsuitable for HGV or high volumes of traffic.

We know this will be an issue – every other development similar to this across the country has been plagued by HGVs misusing local roads, and yet the Applicant has categorically refused to accept that it will be an issue. They have proposed inadequate mitigation measures, which I have commented on in point 5).

I also remain greatly concerned that this development will lead to increased rat-running, as a result of the additional employment traffic from the site, as well as traffic avoiding congestion on the Strategic Road Network, which is becoming an increasing problem and again one which the Applicant seems unwilling to acknowledge.

The SRN (particularly the M6) is routinely congested, and suffering from an increased number of accident related closures as volumes increase, something which WMI will worsen rather than improve. There has been a noticeable impact on local lanes, which see huge increases in traffic as soon as this occurs.

This problem has been exacerbated by the conversion to signal control of a number of junctions locally (for example at the junction of Four Ashes to the A449 and Crateford Lane to the A449). These are now routinely 'advertised' on sites such as Facebook as convenient ways to avoid congestion, and it is clear that the massive increase in vehicle movements to and from WMI will only see this situation worsen.

5 – Traffic Mitigation measures are unsatisfactory

The proposals put forward remain unworkable. For example, the ANPR system proposed for the A449 north through Penkridge has no effective enforcement which means it will be ignored. The Applicant's response that it will be for the Police and other local authorities to enforce is a nonsense given the lack of capacity those authorities have due to budget pressures. It is clear therefore that a number of the mitigations proposed by the Applicant will never be enforced.

Even during the local consultations, when HGVs were routinely using single track country lanes locally in contravention of signed diversion routes during roadworks on the A449, the Applicant's CEO dismissively told me to my face that this didn't happen as he had "driven around that morning and seen no evidence". I'm afraid this succinctly summarises their laissez-faire approach through consultation with residents to mitigating HGV traffic.

The consultation has also thrown up additional concerns around parking for HGVs off site. Whilst some limited measures have been proposed in the form of restricting parking in local laybys, there appears to be no mechanism to stop HGVs from parking inappropriately (including overnight) in surrounding lanes. This again is a well-recognised issue around developments such as this, for example at the Amazon depot in Rugeley, and seems highly likely to occur at WMI.

I have also been incredibly disappointed by the weak mitigation measures proposed to reduce car traffic to the site. The Applicant has forecast the majority of employees will travel by car, and appears to have done the bare minimum to reduce this. I find this ironic for a development that should be all about reducing road traffic. A 10% reduction from 83% to 73% proposed is a poor target, and the proposals put forward for modal shift were weak.

Proposals put forward through consultation have been ignored, for example using workplace parking charges to incentivise workers to travel by public transport. It is again ironic that councils in the wider West Midlands (the region forecast to receive the greatest benefit from additional jobs) are proposing these charges to reduce traffic into employment centres within the West Midlands, but support an application that enables their own citizens to drive additional traffic, pollution and congestion into the countryside.

So much more could have been done if the Applicant had been genuinely committed to reducing traffic. For example, it is disappointing also that there has been no attempt to use the railway to bring employees into the WMI site, or to provide additional amenities for local residents.

Local residents, myself included, have been calling for a new rail park and ride style rail station near WMI for years. The Applicant could have proposed this not only to truly reduce car use to the site, but also as an improvement for residents.

6 – It will cause visual intrusion that simply cannot be mitigated

There is simply no way to describe this vast development as anything other than one which will destroy the visual environment, not only in the immediate vicinity but also for miles around.

Much has been made during discussion about the suitability of the site that the immediate vicinity has already been 'spoiled' by small scale industrial development. However the existing developments are small enough that from only a short distance away they are invisible. This will never be the case with WMI.

The height of the buildings means that visual intrusion will be impossible to hide through landscaping, despite the claims of the Applicant. Current unspoiled views across to Cannock Chase from around Brewood will be lost.

Light pollution from the significantly smaller Bericote development has already had a detrimental effect. Having lived in the area for 40 years, the additional light pollution in the last 12 months has been immediately noticeable from as far away as Codsall to the West, Essington to the South, and Dunston to the North. It is clear that WMI will be far worse than this, and it is evident that WMI will be exempted from classification as a Statutory Nuisance under the Clean Neighbourhoods and Environment Act (2005).

Conclusion

In summary therefore I consider that WMI is a development that has a weak business case, as it cannot exist as a standalone road-rail interchange as a result of its limited rail connections. Instead it requires a huge warehousing development to be built to make it work commercially, which will massively intrude on the local environment, increasing local traffic and congestion rather than removing traffic from the road, and will deliver no benefit to the community in which it exists.

And whilst it has been proposed as an NSIP, there are such significant doubts around whether or not the rail terminal will ever be built that I believe it should be disqualified as an NSIP, with progressed through local planning regulations as a warehousing development.