

West Midlands Interchange,
FREEPOST WMI.

29th August 2017

Re: West Midlands Interchange – Stage 2 Consultation

Thank you for the opportunity to take part in this consultation. Many of my constituents are concerned about the proposals and will have made their views known to you directly. I would urge you to take these into account when assessing how and whether to go forward with this application.

I have set out my response under various headings which my constituents have told me are the most important matters to be addressed.

I make it clear at the outset that I am opposed to these proposals. However, my submission below also includes my suggestions as to how rail freight interchanges in the West Midlands could be taken forward.

1.0 Use of land

1.1 Green Belt

260 Hectares (643 acres) of Green Belt would be lost to the warehouses, new road & rail links and commercial parking. Green Belt land was created for a reason and therefore enjoys a very high degree of protection. In principle, it should not be developed.

There is an argument for reviewing the extent and location of Green Belt land both regionally and nationally. Indeed, I have argued for the creation of new Green Belt in areas where it was originally considered to be unnecessary – for instance between Stafford and Stone. In other areas, the case for Green Belt may be weaker than when it was originally created.

However debate and decisions over the extent and location of Green Belt land must be kept entirely separate from individual planning decisions.

The loss of Green Belt land should this proposal be permitted would be so considerable that it would have the effect of changing Green Belt policy in South Staffordshire and the West Midlands as a whole.

It would potentially open the door to widespread challenges to the integrity of Green Belt from housing and industrial developments.

On the grounds of the very substantial use of Green Belt land alone, this proposal should be rejected.

1.2 Agricultural land and food security

60.1% of the land to be lost is classified as 'good' or 'very good' for agriculture.

While the loss of good/very good agricultural land carries slightly less legal weight as an argument that the loss of Green Belt, it is nevertheless significant.

The United Kingdom's self-sufficiency in food production has fallen to approximately 60%. Food security is increasingly of concern to governments worldwide. Climate change and population growth have the combined effect of reducing available prime agricultural land and increase demand for food.

The UK's temperate climate and good soils make it one of the best places globally for the production of a wide range of staple foods.

The loss of good/very good agricultural land needs to be taken into account, especially when there are 'brownfield' or even existing Rail Freight Interchanges (such as Donnington) which could be put to better use.

1.3 National planning and alternative sites

The proposal rightly considers several other sites in the region before determining that Gailey/Four Ashes is the best.

What it does not do as thoroughly is to consider whether rail freight needs in the West Midlands region would be better served by two (or more) rail freight interchanges on a smaller scale rather than one large strategic freight interchange. This would reduce the distances which need to be travelled by road traffic using the interchanges.

This highlights a fundamental flaw in the national planning for rail freight interchanges. When I wrote to Network Rail to ask what their strategy was for the planning of rail freight interchanges nationally, they replied (25th April 2017):

"When we are approached by developers to connect to our network, our priority is to ensure there is no conflict between the number of proposed services and those that use the route already. We also advise on the physical connection to the railway.

"In addition, we have no legal say over where development should take place. Therefore you may wish to raise your concerns about the suitability of the site with the developer."

So Network Rail simply awaits proposals from developers and then determine whether they can realistically be connected to the national rail network. This does not appear to me to be sensible. Infrastructure as important as this needs to be taken forward in partnership by the Department for Transport, Network Rail, the developers and the potential users of rail freight interchanges.

I therefore propose that this partnership working starts now and that any further development of rail freight interchanges arises out of national and regional determination of the best sites rather than sites being put forward by developers.

1.4 21st Century Logistics

Developments in information technology and robotics are making it less necessary to construct large warehouses to store substantial amounts of stock for periods of time. Smart use of warehousing should considerably reduce the space required.

2.0 Traffic

2.1 Vehicle movements – HGVs

The traffic flows contained in the illustrative diagram make no distinction between HGVs and cars in the numbers.

It is only in the Draft Environmental Statement that we see the full picture.

I set out below some of the figures for the increase in total vehicles and HGVs:

Road	2021 total vehicles no devpt	2021 total vehicles + devpt	% Change	2021 HGVs no devpt	2021 HGVs with devpt	Change
M6 J13-J14	154,703	156,209	0.97%	26,692	28,035	5.03%
A449 J13 – Pinfold Lane	16,172	18,168	12.34%	1,200	1,845	53.8%
A5 between J12 & site access	21,260	31,601	48.64%	1,358	5,358	294.63%
A5 between A449 and A41	19,918	21,307	6.97%	944	1,433	51.8%
A5 between A449 and Gravelly Way	22,306	22,541	1.05%	841	2,178	158.87%
A449 between M54 J2 and Brewood Rd	27,678	32,693	18.12%	1,024	2,703	164.05%

These figures show that, while the increase in total numbers of vehicles may be modest on some sections of the network, the increase in the number of HGV's will be very substantial. In all the cases mentioned above except the first, the number of HGV's will increase by at least 50% over current numbers and in some cases it will be 100-250%.

Even on the M6, it is expected that the development will result in a 5% increase in HGV traffic between Junctions 13 and 14. For a road which is one of the busiest in Europe already, that is a substantial rise.

The very substantial rise in HGV traffic on the A449 between M6 J13 and Pinfold Lane, Penkridge indicates that the developers do not believe that efforts to divert the RFI traffic from travelling through Penkridge (through enforcement by Automatic Number Plate Recognition) will be successful.

Given that the impact of an HGV movement both on residents and the road surface is several times than of a car, it is my contention that the illustrative diagram of peak traffic flows does not present the true picture. For it to do so, there would have to be a weighting factor applied to HGV movements.

2.2 Traffic – A449 through Penkridge

The revised proposals for traffic management are an improvement on those in the previous plans.

However they do not adequately address the concerns over the J13/A449/Gailey traffic. The proposals for installing Automatic Number Plate Recognition technology to catch vehicles which are not supposed to use that stretch of road have already been referred to.

However, a number of other issues need to be addressed, such as, what would happen if the M6 is at a standstill or closed between J12 and J13? Would 'unauthorised' vehicles be fined for using the A449 when all other traffic would be allowed to do so freely? If the control was suspended for that period of time, who would make the decision and how would it be communicated?

2.3 Traffic – A5 – A449 to A41 section

I am concerned about the additional traffic on the A5 between the A449 and the A41. This is a particularly dangerous stretch of road. The table above shows a 51.8% increase in HGV movements along this route is forecast.

The A41 itself is a major trunk road up to the ports of Holyhead and Liverpool and it would be a real temptation for HGVs to divert away from their proposed routes to use a short cut to or from the proposed development. So it is possible that the predicted increase in HGVs on this stretch is too low.

The A5 on this stretch passes through the village of Weston-under-Lizard which is restricted to 40mph. It is barely wide enough for two HGVs currently.

My constituents and I are particularly concerned about the increased risk of very serious accidents on this stretch of the A5.

2.4 Traffic - Distance from main Black County and Birmingham conurbations

This scheme is designed primarily to serve Birmingham and the Black Country. However, the nearest part of the Black Country (Wolverhampton) is approximately 7 miles away and Birmingham town centre is 17 miles away. This will generate additional significant lorry transport on a road network which is already at or near capacity much of the time. The A449 and the M6 south bound and other local roads will inevitably become even more congested for longer periods.

2.5 Traffic - Transport for staff

The proposal states that up to 8,500 jobs will be created, which is welcome.

Most of these staff would come from elsewhere rather than the surrounding communities where both the population and unemployment is very low. Public transport by bus in the area is limited and there is no proposal to include a railway station which could be used by staff.

It is not clear to me whether the traffic predictions include the vehicle movements required for staff to come to work.

3.0 Impact on the Environment

The ecological baseline study shows that a number of European Protected Species have been found. The full impact of the proposed development on each of these species needs to be properly evaluated. I am concerned that the development would be detrimental to maintaining local populations of some or all of these species.

The mitigation measures proposed will reduce the damage done but it will be some time before any replacement planting reaches any significant size in order to be able to have the impact that is desired.

It is vital, therefore, that continuing efforts are made to ensure that as much information as possible is compiled in order to properly assess the impact of the proposed development, not just at the moment.

I will now turn to the specific questions in the Stage 2 consultation.

Question 1 – Suitability of the Four Ashes site

See sections 1.1, 1.2, 1.3 and 1.4 above.

Question 2 – Illustrative Masterplan

The masterplan does not appear to show why there is the need for such an extensive development of warehousing. I do not see an analysis of current and future developments in digital infrastructure and robotics which may enable much more efficient logistics and usage of warehousing in the future.

In assessing future vehicle movements, it does not seem to take into account the difference in impact between cars and HGVs. See section 2.1 for further discussion of this.

Question 3 – Community Benefits

The community benefits, such as parks, are a welcome feature of the proposals. However, if it is decided that this is the right location for a rail freight interchange, it would be preferable to reduce the overall land take very substantially and leave the Green Belt in approximately its current state.

The community fund could be dedicated to improving local transport links.

Question 4 - Employment

It is vital that people in South Staffordshire are able to access any jobs that are created. This can be done through

- Ensuring that all local Job Centre Plus offices and recruitment agencies are automatically advised of any job vacancies;
- Working with local schools and colleges so that they are aware of the qualifications likely to be needed to take up the jobs which are created;
- Stipulating in the sales/rental agreements with businesses which come onto the site that full consideration must be given to recruiting from the local area;
- Including mandatory apprenticeships in all agreements with contractors and sub-contractors who are involved in developing the site.

Question 5 – Environmental Impact and Mitigation Measures

Four Ashes Limited has put in considerable work to mitigating the impact of the development on the environment. However there is very little mitigation proposed for the 'off site' impact of the development, in particular the substantial increase in HGV traffic on the A449 and A5.

The A449 between Gailey and J13 and the A5 between Gailey and the A41 are particularly sensitive to increases in HGV traffic. All HGV traffic using the interchange should be prevented from using these two stretches of road except when there is a closure on the M6 or the M54 respectively.

Given that what is proposed is a major piece of transport infrastructure, the impact on surrounding communities and roads, away from the development itself must be fully taken into consideration and mitigated. It has not been.

Question 6 – Impact on the Surrounding Road Network

Please see my answer to Question 6 and sections 2.1, 2.2, 2.3, 2.4 and 2.5 above.

Question 7 – Other comments

I cannot support this particular proposal. If permitted, it would in effect change national policy on Green Belt which should only be done by Parliament, not by the Secretary of State.

The development arises out of an abdication by Government and Network Rail of their responsibility for working with rail freight users and developers to determine where are the most appropriate sites for RFI's.

There is an assumption, which I strongly question, that one very large interchange is preferable to a more distributed network of smaller interchanges which would lead to fewer 'goods miles' and less impact on the local road networks surrounding the interchanges.

The true impact of the additional HGV vehicle movements has not been clearly highlighted in the summary documents, which will have been those read by most consultees. It appears only in the lengthy Environmental Statement.

The development is, in my view, predicated on a 20th century view of logistics in which large warehouses and HGVs dominate. A proposal based on 21st century technologies, including

robotics and enhanced information technology, would be preferable and likely to require far less land take.

One point of clarification: On page 35 of the Environmental Statement (Emergency Access 4.85), you state: "The nearest hospital with A&E services and police station are located to the east of Cannock." Cannock Hospital does not have an A&E. The nearest hospitals with A&E are County, Stafford (8am to 10pm) and New Cross Wolverhampton (24 hours).

Thank you again for the opportunity to take part in this consultation.

Yours sincerely

Jeremy Lefroy MP