

## West Midlands Regional Spatial Strategy Phase Two Revision

Consultation Response Form on the West Midlands RSS Phase 2 Revision  
Draft submitted by the West Midlands Regional Assembly

### **Making Comments**

It is very helpful to us if you use this form to make your comments and if possible e-mail or post it to the following:

WMRSS Panel Secretary  
c/o Government Office for the West Midlands  
5 St Philip's Place  
Colmore Row  
Birmingham B3 2PW

E-mail: [wm.panelsecretary@gowm.gsi.gov.uk](mailto:wm.panelsecretary@gowm.gsi.gov.uk)

### **Deadline for Comments**

Deadline for receipt of completed forms is **12.00pm on 8<sup>th</sup> December 2008**

### **Additional Copies**

Additional copies of the form can be downloaded from the Government Office for the West Midlands web site at <http://www.go-wm.gov.uk> or [www.wmra.gov.uk](http://www.wmra.gov.uk) or can be requested by contacting Government Office for West Midlands on: 0121 352 5476.

### **How to complete this form**

Please complete a separate copy of the form for each matter that you wish to comment on, showing each time which policy or paragraph of the WMRSS Phase Two Revision Draft Submission documents you are commenting on.

Please note that all comments will be made available for the public to read – they cannot be treated as confidential. However, please be assured, WMRSS Panel Secretary will only use the contact details provided for the sole purpose of distributing appropriate information about this consultation and the next stages of the process.

### **Contact Details**

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<b>I am commenting as (please tick)</b>			
A private individual		Local Authority of Parish Council	
Business representative group		Campaign Group	
Utility and emergency services		Statutory Body or Government Agency	<b>X</b>
Landowner, Developer or Agent		Voluntary / Community group	
Representative of a client		Other (please specify)	
If you are commenting on behalf of a client, please add their name here			

<b>Please indicate which Paragraph or Policy your comment relates to:</b>	
Paragraph Number	Policy <b>PA9</b> Number

**Please use the section below to give your comments.**

### **Policy PA 9 Regional Logistics Sites**

The Highways Agency recognises the increasing importance to the regional economy of warehousing and distribution activity and the link between the logistics competitiveness of the West Midlands and the future provision of Regional Logistics Sites (RLS) offering modal choice. The Highways Agency will work with developers, relevant local authorities and key partners including AWM to support their provision once appropriate locations for additional RLS development have been identified through the development plan process.

Road transport will remain the dominant mode for most goods flows and the majority of cargo arriving and departing distribution centres located on rail connected logistics sites will be by road transport. Studies undertaken for the West Midlands Regional Assembly<sup>1</sup> have estimated that around 50% of in bound goods can be expected to arrive by rail (balance by road), and around 25% depart by rail at a National Distribution Centre (NDC), providing inter-modal facilities if rail freight services work to their full potential,. At a Regional Distribution Centre (RDC), the comparative figures are 25% of inbound goods arrive by rail (balance by road), and all departing goods leave by road. It is therefore estimated that for a rail connected logistics site comprising 200,000m<sup>2</sup> of floor space, this would equate to around 1,500 inbound and out bound goods trips per day.

The number of inbound and outbound trips from a RLS will also be increased due to the significant numbers of people employed on site. It is estimated that a NDC normally requires 10 staff per 1,000 square metres of floorspace<sup>2</sup>. Therefore a logistics site incorporating 200,000m<sup>2</sup> will require up to 2,000 staff just for warehousing activity, plus HGV drivers and employees for the intermodal terminal.

It should be recognised that the trip estimates described above relate to a rail served Regional Logistics Site. However, it is important to note that much of the logistics floorspace developed in the West Midlands region to date is not rail served. As a result the number of inbound and outbound trips that will occur on the SRN will be considerably greater than would be expected for a similar sized RLS with inter-modal

<sup>1</sup> West Midlands Regional Logistics Study –Stage2 (September 2005)

<sup>2</sup> West Midlands Regional Logistics Study –Stage 2 (September 2005)

facilities.

With a significant increase expected in the demand for warehousing and distribution floorspace within the West Midlands expected over the period of the RSS it is essential that the spatial strategy sets out a robust planning framework to guide future development to those parts of the region where there are no transport capacity constraints to their development. It will also be necessary to ensure that where there are genuine opportunities to promote the development of rail served RLS that the RSS should ensure that priority is given to their development over non-rail served logistics facilities, particularly where there are congestion and environmental benefits to be had by adopting such an approach.

It is against this background that the Highways Agency wishes to comment on Policy PA9.

The Highways Agency welcomes and supports the importance attached in Part B of Policy PA9 to ensuring that such developments are served by multi-modal transport facilities, broadband IT infrastructure and possess good quality public transport links, or be capable of having such links provided. The promotion of a multi-modal approach to accessing all RLS will assist in reducing the demand for use of the strategic road network and the problems caused by increasing levels of road traffic growth and congestion.

In recognising the need for RLS to be served by the SRN, an important consideration when determining the suitability of a location for their development will be the scale and nature of their traffic impact upon the safe and efficient functioning of the strategic road network

Given the size of the site required to accommodate developments of this nature (50 -75 hectares) and their locational requirements in terms of access to the SRN proposals for further RLS development will generally take the form of extensions to existing logistics sites or be focussed on new sites in out-of-centre locations. Typically these sites will also tend to be less well served by sustainable transport modes and will, as a result, be more reliant on access by private transport. In view of the significant levels of employment and trips generated by RLS, their development at inappropriate locations has the potential to further exacerbate existing congestion problems around key motorway junctions to the detriment of the wider regional economy.

The importance of this is recognised in the justification for Policy PA9 (para7.46) and the need to ensure that:

*“Major concentrations of warehousing and distribution will be discouraged both within urban areas and immediately adjacent to motorway junctions, where a high level of heavy goods traffic would further exacerbate congestion”*

The Highways Agency agrees with this approach and would welcome the inclusion of the text above within Part B of Policy PA9.

The primary objective of policy PA9 to provide guidance on a proposed spatial distribution of Regional Logistics Sites to meet the regions future needs. However the Preferred Option fails to recognise that a significant amount of the regions future warehousing and distribution needs will continue to be met through the development of non-rail served logistics sites. This needs to be reflected in the Preferred Option and a strategic policy framework put in place which provides guidance on the criteria against which proposals of this nature should be considered. This should include the proposed developments impact on the operation of the SRN. A new or revised Policy PA9 should also seek to ensure that where there is a need for additional logistics development and

this can be met through the development of a RLS with intermodal facilities, that priority is given to promoting the development of the latter over non-rail served site(s) in the same sub-region.

In order to address these concerns the Highways Agency would suggest that Policy PA 9 should be revised to incorporate the following amendments:

- The inclusion of additional text in part B of Policy PA9 which states that:  
*“Major concentrations of warehousing and distribution will be discouraged both within urban areas and immediately adjacent to motorway junctions, where a high level of heavy goods traffic would further exacerbate congestion”*
- The inclusion of additional text within Policy PA9 which requires that the proposed development should not have an adverse impact on the operational capacity or safe and efficient functioning of the SRN (link or junction) which cannot be mitigated in line with the requirements of national policy or the standards set out in the Highways Agency’s *“Design Manual for Roads and Bridges”*
- The inclusion of additional text within Policy PA9 which requires that approval for proposed development will be conditional upon the adoption of measures which seek to minimise parking provision across the development linked to the preparation of a travel plan for the whole site, the implementation of proposals for public transport and accessibility improvements and, the implementation of any necessary demand management measures.
- The inclusion of additional text within Policy PA9 which identifies the importance of involving the Highways Agency from the outset of the process of considering emerging proposals for the development of RIS. This should refer to the need for the Highways Agency to be involved in agreeing the scope and nature of any Transport Assessments required and its further agreement on the scope and nature of the transport measures required to mitigate the impact of the development on the SRN.
- The inclusion of additional policy guidance in relation to identification of sites for non-rail served logistics developments and the criteria to be used in considering the phasing of their development.

Currently the Highways Agency is aware of a number of emerging proposals for rail and non-rail served logistics developments in both Staffordshire and Warwickshire. To date the Highways Agency has not undertaken any analysis of their potential transport impacts or implications for the safe and efficient operation of the SRN. Until such time as this work has been undertaken the Highways Agency would wish to reserve its position on the acceptability of any of these schemes.

(Please continue on a separate sheet if required)