

West Midlands Interchange – objections from Margaret and Maurice Heath, Brewood

The Gailey site is unsuitable for industrial development because:

- 1] The enormous West Midlands Interchange would be built on a green belt site.**
- 2] Volume of traffic connected with the West Midlands Interchange**
- 3] Several thousand heavily laden HGV's would be passing through areas which are already at or above dangerous levels of air pollution, as per government guidelines.**
- 4] Several thousand HGV's would be passing close to schools, where air pollution levels are at or above the limit of government guidelines.**
- 5] The local road infrastructure is unable to cope with any additional high volume of traffic, particularly HGV's.**
- 6] Job creation estimates are unsubstantiated and optimistic and do not cater for the locality.**
- 7] The West Midlands Interchange would impact on historical sites.**
- 8] The West Midlands Interchange would impact on local wildlife habitats.**

Reasoning and proof of the above eight points.

1] The enormous West Midlands Interchange would be built on a green belt site.
There are many old industrial sites near communication links and conurbation sites within the West Midlands and other conurbations, which are unsightly for the towns and would provide shorter travelling distances for the HGV's and so less air pollution, without encroaching on green belt.

2] Volume of traffic connected with the West Midlands Interchange

Four Ashes Ltd claim to 'reduce traffic' but the site is not near any large conurbation or manufacturing companies, so there would still be a lot of travelling for the HGV vehicles, which would have a major impact on air and noise pollution, apart from a significant increase in accidents.

Four Ashes Ltd also claim that the location of the site is ideal for the HGV's to reach 88% of the population of the UK within a driving distance of 4 ½ hours, which negates the claim for reduced traffic on the motorways. Reference: Four Ashes Ltd Document : [http:// www.westmidlandsinterchange.co.uk](http://www.westmidlandsinterchange.co.uk)

The expected volume of traffic will be too high for the surrounding road network. Four Ashes Ltd are predicting 10 trains per day at a length of 775m length, the maximum length of UK and European Intermodal trains at the moment [Reference: Document 6.2 Technical Appendix 15.1 –Transport Assessment Regulation 5(2)(a)]

WSP-July 2018 , 4.1.11: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000412-Doc%206.2%20ES%20Trans%20App%2015.1%20-%20Transport%20Ass.pdf>]

Four Ashes Ltd also boasts that the West Midlands Interchange at Gailey Island will be one of only a few sites in the country that would be capable of receiving the large 9' 6" containers and which has the 'right road and rail access'. [Reference: <http://www.westmidlandsinterchange.co.uk/about-the-project/>]

The company of Four Ashes Ltd, is also aiming to make the terminal 'open' so that additional companies, other than rail could also use the service: [Reference: 4.1.12 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000412-Doc%206.2%20ES%20Trans%20App%2015.1%20-%20Transport%20Ass.pdf>]

Even by doing an extensive information retrieval search it is difficult to find Four Ashes Ltd predicted number of vehicles using the 800,000 sq. m of rail served warehousing and ancillary service buildings **with also manufacturing and processing plant expected**: [Reference: [https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/west-midlands-interchange: About this Project](https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/west-midlands-interchange:About%20this%20Project)]

However, at the company's meetings at both Jubilee Hall, Brewood on Wednesday 12 July 2017 and Haling Dene, Penkridge on Thursday 20 July 2017 there was an expectation that one vehicle would be leaving the site every 3 seconds over a time period of 24 hours per day. This may be an underestimate given the offhand comment about the manufacturing and processing plant. The 'Snub the Hub' campaign quotes an extra 18,624 vehicles a day of which 6,319 would be HGV vehicles. If each HGV was thought of as four cars, based on their length then it is the equivalent of 54 cars per minute or 3240 per hour www.gov.uk/guidance/moving-goods-by-road#the-different-road-haulage-vehicles

Each of the expected 6,319 HGV lorries could weigh 44 tonnes laden. This figure had no meaning to me until I found out that each HGV was capable of carrying the weight of 10 or more adult elephants.

Road surface

The damage to the road surface of both the motorways and the local roads is substantial with HGV loads. However, the volume of road traffic on the roads would, in addition, make any road repair extremely difficult, causing major traffic jams.

Accidents

There is statistical evidence to prove that there are more fatalities in collision with HGV's than car to car. Drivers lose patience at Gailey roundabout which is already very busy with traffic and cut in to any available space. The HGV's struggle to turn at the newly laid out roundabout, the road is not wide enough, and vehicles use their own lane, but the HGV's straddle two lanes, by necessity. [Witnessed on Thursday 28 March 2019 at 9.30 a.m. and 4.45 p.m.]

The number of HGV's is expected to increase by 22 % between 2015 and 2025 so this would add to the predicted numbers as given by Four Ashes Ltd. Reference:
<https://www.tfwm.org.uk/media/1207/west-midlands-freight-strategy.pdf>

The M6 is one of the busiest motorways for freight in the country, recognised on page 6 of the West Midlands Interchange welcome exhibition document
<http://www.westmidlandsinterchange.co.uk/wp-content/uploads/2016/06/WMI-Stage-1-Exhibition-Banners.pdf>

In 2003, 180,000 vehicles per day were using the M6 at its busiest point near Wolverhampton, The motorway was only designed to accommodate a maximum of 72,000 vehicles per day. As such the M6 toll had to be created but, because of the toll charge, it is less attractive for drivers of HGV vehicles to use, and car drivers find it too expensive. The toll road is also a longer route in mileage than just going straight down the M6 . The UK government has no power to alter the toll charges until 2054.

The M6 is being updated to a smart motorway between Junctions 13 and 15. This, from experience, invokes traffic delays as the lanes are reduced from 3 lanes to 1 lane. Work is not expected to be completed until March 2022, but work on the Gailey interchange is expected to go ahead in 2020.

As there is another rail terminal at Daventry, the implication is that much of the container traffic needed for the Birmingham area would be better to use that site.

Vehicles connected with the West Midlands Interchange would be able to travel north and south bound along the M6 , but also, as advertised by Four Ashes Ltd are also able to access the M54 to Birmingham or Shrewsbury, the A5 towards Telford or the A41 towards Chester and Liverpool. The local roads are ancient highways and are neither wide enough nor strong enough to cope with HGV's. The reports for the interchange appear to gloss over access to the M54 at junction 3 and the access to the A5 towards Telford which is also the 'preferred' route for access to the A41. The A5 is a narrow road with blind dips, often catering for slow traffic such as tractors. Impatient drivers frequently overtake causing oncoming traffic to have to brake to a standstill to avoid a collision. There have been fatal accidents and car crashes.

The A5 is the access road to the A449 from Brewood. The right hand turn is extremely dangerous during heavy traffic periods now particularly at the cross roads at Ivy House Lane where the traffic comes down fast on the downslope, even though there is a 50mph limit. It would also apply to the junction of the A5 with Horsebrook Lane and also Claygates Road.

3] Several thousand heavily laden HGV's would be passing through areas which are already at or above dangerous levels of air pollution, as per government guidelines.

South Staffordshire County Council has already identified that there are four levels of air pollution, mainly from road vehicles where the levels of air pollution are already close to the air quality limits. These are all areas where HGV vehicles from the site would be anticipated to continue their travels: Penkridge, the area adjacent to the M6;

the A5 towards Hatherton; Bursnips Road, Essington, and Wolverhampton Road at Wedges Mills. Reference: <https://www.sstaffs.gov.uk/environment/air-quality.cfm>

Cannock Chase Council has updated the information saying that already the A5 towards Hatherton and Bridgtown, a route that would be used by the HGV's after leaving the proposed site, already has nitrogen dioxide levels that **exceed** the national air quality objective. <https://www.cannockchasedc.gov.uk/business/environmental-health/environmental-protection/local-air-quality-management>

These reports indicate quite clearly that if this site continues, the air pollution levels in our area will very quickly exceed the national air quality limits as set down by WHO and government guidelines.

There is an implication from the reports that the HGV's will mainly use the M6.

As the HGV vehicles travel south down the M6 motorway they will be adding to the severe problems of pollution that are already experienced at the approach to Birmingham and the junction with the M5 motorway. [see Walsall Council, and Sandwell Councils reports]. Similar problems are being experienced in Cheshire, where the issues of air and noise pollution on the M6 are already exceeding the government guidelines [See Cranage Residents Association].

4] Several thousand HGV's would be passing close to schools, where air pollution levels are at or above the limit of government guidelines.

Wolgarston High School, the local secondary school for pupils from Brewood, Coven, Penkridge, Wheaton Aston and Lapley is **located 250 metres** from the M6, with the playing fields adjacent to the M6, and the playground close to the M6. [Reference: Street by Street Staffordshire, AA, p.230]

Penkridge First Schools [Marshbrook First School, St Michael's First School, Princefield First School] are located between the M6 and A449 and both roads will receive a substantial increase in traffic due to the Four Ashes Ltd West Midlands Interchange.

The A449 receives all the M6 traffic when the northbound motorway is closed at any point from Junctions 10a to Junction 13. There are no alternative routes to alleviate the problem other than one exit at the A449/Wolgarston Way roundabout towards the A34. This road is unsuitable for HGV vehicles and passes Wolgarston High School substantially increasing the air pollution to the school children.

Catchment area for schools

There are several schools in Brewood: St Mary and St Chad's First School, St Mary's Roman Catholic school, Brewood Middle School and St Dominic's private school. The children attending these schools come from a wide catchment area, many of which will have to travel along the A5 or A449 to attend their school. If the Four Ashes Ltd West Midlands Interchange goes ahead, the substantial increase in air pollution will have a detrimental effect on the health of these children.

The building of the extensive West Midlands interchange on the green belt is unwelcome. The sudden substantial increase in traffic will substantially increase air pollution. There are many studies which show the detrimental effect that air pollution has on lives. A study at Malmö, Sweden by Lund University showed that over 400,000 people in Europe die prematurely due to air pollution, and exhaust fumes were the prime cause. The exhaust fumes also were responsible for childhood asthma and bronchitis, and could be linked with preeclampsia in pregnant women. The report also cited the exhaust fumes as having a detrimental effect on dementia.
<https://www.sciencedaily.com/releases/2018/06/180604112505>.

Another report by the World Health Organization cites the transport sector as being the main cause of urban air pollution. Their research found that in the areas with high concentrations of vehicle exhaust fumes there was a corresponding increase in the risk of cardiovascular and respiratory disease, cancer and adverse birth outcomes, as well as higher death rates. <https://www.who.int/sustainable-development/transport/health-risks/air-pollution/en/>

Adult population and pollution

The air pollution does not only affect the children, adults and the elderly are also at risk from ill health due to the planned heavy and sudden increase in traffic levels.

Local factors and air and noise pollution

Four Ashes Ltd omitted any detail about planned local factors which also have an impact on air pollution. These include

- a) the increased traffic from residential development and the use of one or two cars per household. There is planned of housing estates in Brewwood and the surrounding area, and the 10,000 homes planned for Tong village at junction 3 of the M54, and the usual way to access the motorway from Brewood.
- b) the increased traffic from the additional parents driving their children to schools in the area, or from the older schoolchildren driving themselves to schools and colleges in the area, as the subsidised bus passes are planned to be cancelled for the 16 – 18 year olds from Autumn 2019.
- c) the opening up of the entrance to Woodcote Hall Quarry on the A41 at Sherriff Hales, which has increased the number of lorries on the road.

5] The local road infrastructure is unable to cope with any additional high volume of traffic, particularly HGV's.

At the meetings by Four Ashes Ltd at Penkridge and Brewwood, there were assurances given that the traffic connected with the West Midland Interchange would not be allowed through Penkridge. However, this has two implications for Brewood.

Firstly, when there is any traffic congestion there will be many drivers following their sat navs and taking short cuts through Brewwood, perhaps along the Kiddemore Green Road or along the A5 at Weston Park to access the M54 and A41. They will find that

they are negotiating school traffic, cyclists, horses, tractors and pedestrians. They will find narrow roads, blind corners and with the narrow paths or non-existent paths, the risk of accidents and fatalities will increase dramatically.

If the M6 is closed, which happens quite frequently between junctions 12 and 13, the road is gridlocked to Stafford and beyond. Along the A449 to Stafford, the feeder roads are often little more than single track, the roads narrow and the villages historic, particularly Lapley. These routes would be totally unsuitable for heavy volumes of car traffic, and totally unsuitable for HGV's.

When the traffic becomes stationary, the pollution levels will exceed the WHO and government guidelines

The Four Ashes Ltd case for the West Midlands Interchange does not take into account the extra car usage in the area since the report was written. It is becoming increasingly dangerous to pull out onto the A5 at the cross roads with Ivy House Lane and Watling Street, and will be the same at the junction of Clay Gates Road with Watling Street. The report by Four Ashes Ltd, states that the road system is excellent on the M6, A449 and A5, [Reference: <http://www.westmidlandsinterchange.co.uk/wp-content/uploads/2016/06/WMI-Stage-1-Exhibition-Banners.pdf>] but this is clearly not the experience for local road users

Four Ashes Ltd quote that the location of the 800,000 square metre site is conveniently located for M6, A5, A449 and M 54 – and also the A41. [Reference: Welcome from West Midlands Interchange <http://www.westmidlandsinterchange.co.uk/wp-content/uploads/2016/06/WMI-Stage-1-Exhibition-Banners.pdf>]

Road improvements

Document 7.1A, 10.3.28 published by Four Ashes Ltd states that there will be local road improvements but there have already been 'road improvements' at Gailey Island. This has caused speculation that the West Midlands Freight interchange is a 'done deal' and anybody who objects is wasting their time. What has been done is a new cycle way and a labelling of which lane to approach to cross the roundabout. Any vehicle travelling north on the A449 from Coven and approaching Gailey island wishing to turn towards the A5 eastbound is expected, naturally, to go into the right hand lane but the HGV vehicles since the road improvements seem to have difficulty in negotiating the roundabout.

HGV lorries are a lot heavier than cars, and take Gailey roundabout much slower than a normal car [Visual evidence 28 March 2019, 4.45 p.m.] They also, at times when the A449 and A5 are gridlocked at Gailey island cross the roundabout blocking off exits, which, of course, makes matters worse. HGV vehicle drivers are not alone in this, their vehicles are just longer.

6] Job creation estimates are unsubstantiated and optimistic and do not cater for the locality.

There are a predicted 8,550 full time jobs to be created on site. However, on reading Document 7.1A West Midlands Interchange July 2018 by Four Ashes Ltd: The West Midlands Rail freight interchange Order 201X Planning Statement Document Ref 7.1A. , page 12, Four Ashes Ltd only claim that “The Proposed Development is estimated to **support the generation of up to 8550 full time jobs** in site, with the profile of jobs providing a good fit with those jobs being sought in the surrounding area. The proposals would provide a major economic boost for the sub-regional economy ...”

There are no details as to whether this includes the jobs required for the construction of the site. In this progressive age, one would assume that there would be a lot of automation on site. The public were told at the meetings at Brewwood and Penkridge, that the jobs would be unskilled but would provide a lot of local employment. It is extremely difficult for anybody living in Brewwood to access the site.

How does anybody from Brewwood employed on site access their work?

To cope with the extra 8,550 jobs Four Ashes Ltd has stated that they would increase the frequency of the number 54 bus service between Wolverhampton and the site [Document 7.1A, 10.3.28]. This will be of no use to residents at Brewwood, in which parish the development is being built, as this bus service does not run through the village.

The only access to the West Midlands interchange is by car causing more congestion on the roads, or walking along unpaved roads, with sharp bends to the A449 a distance of just under 3 miles. The roads are unlit, and so a risk of an accident is high. There is only one, infrequent bus that goes through the village to Coven, the 877/878 by Select Buses.

7] The West Midlands Interchange would impact on historical sites.

The area around Brewwood and the proposed site of the West Midlands Interchange has great historical significance. Horowitz quotes various evidence of inhabitation of the area during the Neolithic and Bronze Ages. [Horowitz, David: Brewwood].

It is in South Staffordshire that the Anglo-Saxon Staffordshire Hoard was discovered, along the ancient Watling Street, now the A5, at Burntwood.

In the area of Stretton, Kinvaston, Water Eaton and Brewwood, there is the ancient Roman Fort and town of Pennocrucium and at Engleton, Brewwood, there is the Roman Villa, Engleton Villa. Pennocrucium is a scheduled monument by Historic England : <https://historicengland.org.uk/listing/the-list/list-entry/1006121>

The Roman Villa of Engleton, located close to the A5 at Engleton, was discovered in 1937 and excavated on a small scale with the help of schoolchildren.

The Roman Fort and town of Pennocrucium is connected to the villa and mentioned in the Antonine Itinerary of the second century. It was thought to have been in existence from at least 1-4 A.D. It was only discovered, with the help of Mary Wakefield, a

Brewood local historian, in 1946 **and has only been excavated on a small scale**. The road has been an important highway through the centuries.

These sites are very close to the A5 and the Roman remains could be damaged by the vibration of the 44 tonne HGV's continually using the route.

Reference: Ford, Paul: Pennocrucium: Stretton, Kinvaston and Water Eaton published in 2000, deposited at William Salt Library, Stafford : Thesis 114; Horovitz, David: Brewood; <http://roman-britain.co.uk/places/pennocrucium.htm>

The A5 was an ancient coaching road towards Lichfield and Chester. It has never been properly excavated, but in the vicinity of Brewood were the coaching inns of the Red Dog, at Bellfields, the Crown near Ivy House Lane and the Bell, still use as a pub.

8] The West Midlands Interchange would impact on local wildlife habitats.

The air and noise pollution from the West Midlands Interchange will also have a detrimental effect on all our wildlife, there being two reservoirs at the M6 and A5 roundabout at Junction 12, and with the increased traffic expected on the A5, this will also be detrimental to the wildlife at Belvide reservoir, all adjacent to the major roads.