

Proof of Evidence

On behalf of
Stop the West Midlands Interchange

3. ROAD INFRASTRUCTURE REPORT

In respect of the proposed West Midlands
Interchange



Strategic Rail Freight Interchange

9.1 – Roads - Introduction

Introduction

This evidence has been prepared by a local community group opposed to the West Midlands Interchange at Gailey, Four Ashes and Calf Heath in South Staffordshire. The community group was set up to represent the views of local residents. The group comprises of professional experts and local residents. It also has local political support from Gavin Williamson (South Staffordshire MP) and Jeremy Lefroy (Stafford MP).

‘Stop The West Midlands Interchange’ currently has over 2500 members from the neighbouring communities that will be directly or indirectly affected by the proposed development, these include the communities of Gailey, Four Ashes, Calf Heath, Hatherton, Penkridge, Brewood & Coven.

We do not propose to repeat the objections made by the professional bodies, local authorities and political leaders we are merely seeking to offer a local perspective and provide our own views on this proposal, which is supported by evidence and professional experts.

This report focuses on the Road Infrastructure for this development at this location.

This report should be read in conjunction with the other reports being prepared by the group on the following matters:-

- Planning and Green Belt
- Railway Infrastructure;
- Health impact / Air Pollution;
- Environment & ecological issues;
- Tourism / recreational issues;
- Agriculture;
- Location;
- Supporting Information; and
- Answers to the Inspector’s Questions

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SUMMARY OF OUR OBJECTIONS

- According to National Policy for SRFI's they should be placed in appropriate locations. WMI is not connected to an extensive trunk road network or near to a major conurbation. The A5 heading west from Gailey to Priorslee was detrunked in 1995 and narrows in places and is highly unsuitable for HGV's and this has not been considered in the traffic impact assessments.
- Statement T9 in the Strategy for the A5 2011 -2026 states that where possible, major developments sites should be located close to existing public transport services and interchange facilities.
- We believe that WMI will not function as a SRFI and consequently will generate greatly increased traffic on the highways and village road network in the area and not as the applicant proposes, reduce it, whilst bringing no, or only marginal benefits in the form of modal shift. The proposed weight limits on a number of country lanes are not enforceable and are likely to be ignored.
- There is a significantly increased risk to the safety and wellbeing of local residents from increased carbon emissions, light, noise and heavy traffic on unsuitable roads and the consequential rat-running.
- An additional 20,000 approximate vehicle movements per day would be generated with the majority predicted to use J12 of the M6. All traffic will have to use the A5 (de-trunked in parts) & A449. The applicant has failed to demonstrate the effects that perturbation of these very critical arteries will have on the surrounding village roads.
- We have commissioned the attached independent Report from Milestone which concludes that the inconsistencies, lack of evidence and fundamental flaws in the documents submitted by the Applicants means that the conclusions sought to be drawn by them cannot be considered acceptable.

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1.0 National Planning Practice Guidance, 2014

The guidance states that when deciding whether air quality is relevant to a planning application, considerations could include whether the development would:

- Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. This could be by generating or increasing traffic congestion; significantly changing traffic volumes, vehicle speed or both; or significantly altering the traffic composition on local roads.

1.1 NPSNN 5.7 – The environmental statement should describe

- any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project.

1.2 And National Planning Practice Guidance – Overarching principles on Travel Plans, Transport Assessments and Statements, 2014: 15.27 Paragraph 006 reference ID 42-006-20140306 of the PPG outlines that Travel Plans, Transport Assessments and Statements can positively contribute to:

- Lessening traffic generation and its detrimental impacts.
- Reducing carbon emissions and climate impacts.
- Reducing the need for new development to increase existing road capacity or provide new roads.

1.3 Kilbride Managing Director Peter Frost said: “There will be more traffic because of the project – we are very honest about that.”

“But independent studies by Highways England have shown the roads can cope, the capacity exists, and that by creating our own new road there are some net gains for motorists at Gailey Island and Station Drive for access between the A449 and A5.”

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Picture 1.

Picture 2.

2017/18. Pictures taken on the A5 approaching Gailey from the West (pic 1.) and between M6 J12 and Gailey (pic 2) where the extra island is proposed. This shows the incapacity of local roads both in the direct vicinity of the proposed site and approaching the proposed site.

(1.1.6) Rail freight is also a sustainable approach. Tonne for tonne, transporting goods by rail produces much fewer chemicals linked with global warming and air pollution than carrying goods by road. This could also help ease congestion in the region by removing the need for thousands of HGV journeys from the M6”

Ref: File reference TR050005 West Midlands Interchange (WMI)

Status Final Author Louise Evans

Date 7 September 2017

Meeting with Four Ashes Limited (FAL)

1.4 However, once fully operating there will be in the region of 6,000 cars or vans, mainly employees, entering and leaving the site over 24 hours, equating to 12,000 journeys a day, according to the project’s travel assessment.

There will also be more than 3,000 lorries going to and from the site each day – equal to 6,318 journeys over 24 hours. It amounts to a lorry entering or leaving the site every 15 seconds on average at peak or 260 journeys an hour.

(1.1.6) Rail freight is also a sustainable approach. Tonne for tonne, transporting goods by rail produces much fewer chemicals linked with global warming and air pollution than carrying goods by road. This could also help ease congestion in the region by removing the need for thousands of HGV journeys from the M6”

1.5 Around 1,000 extra vehicles – between 622 and 738 cars and vans, plus 300 lorries – are expected to enter and leave the site at morning and evening rush hours.

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Rush hour traffic – incidents. M6 J11-J12



Rush hour traffic 5.30pm 23rd Jan 2019. Exit J12 M6 North, queuing off slip road onto the island to exit onto A5 West towards Gailey.

1.6 Traffic will be spread across three entrance and exit points to the site, located off the A5, off the A449, and at Vicarage Road in Four Ashes.

Most of the HGV traffic is expected to travel to and from the site between the A5 entrance/exit and junction 12 of the M6, which is just shy of a mile.

(1.1.6) Rail freight is also a sustainable approach. Tonne for tonne, transporting goods by rail produces much fewer chemicals linked with global warming and air pollution than carrying

goods by road. This could also help ease congestion in the region by removing the need for thousands of HGV journeys from the M6”

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1.7 However, the report says the extra traffic will lead to a maximum delay of 59 seconds on some journeys – but the new road could cut 19 seconds off others.

Mr Frost said: “There will be additional traffic, particularly from the M6 junction and the new roundabout on the A5. We have been clear about that.

“There is capacity on the roads. It is a hard argument to get across. The roads are busy around there because of existing pinch points.”

2.0 (Local residents feedback 2018)

2.1 The “ pinch points” as the West Midlands Interchange informed us, can be ironed out by larger and more frequent roundabouts, which will not be the case.

The default position in the morning is queue to make a right turn on to the A5 then a queue at Gailey then a queue to join the M6 either at Junction 12 – where there are so many 40 ton HGV some mornings filtering in is difficult as the drivers simply will not move over or slacken speed. The reduction from 4 lanes back to three at Junction 13 results quite often in a convoy of trucks driving so close together that there is no room to change lanes anyway.

Exiting at Junction 14 is the same; where drivers get stuck on the approach to Beaconside, which is also queued back to the motorway because of new house building and temporary lights for access. If there is an accident on the M6 the default position is to close the motorway down, causing all other routes to become gridlocked. The knock on from that is not good for existing local business/schools etc and the diesel particulate output. The fallback traffic on the A449/A5 results in gridlock. We now have the advent of an upgrade to a “ smart “ motorway between J13 and J14 and the queues are already forming - the average speed cameras are up but not working yet - when there is another accident the result will be as above.

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2.2 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.

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%

2.3 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%.

2.4 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.

2.5 It is clearly indicated that from the increase in numbers of HGV's travelling between the A449 J13 and Pinfold Lane (Penkridge) that the developers do not believe that the prevention strategy (enforcement through number plate recognition) to stop SRFI traffic travelling through Penkridge will work.

2.6 The Strategic Road Network and the Delivery of Sustainable Development (DFT Circular 02/2013) 15.29 Paragraph 9 states:

“Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase for use of a section that is already operating at over capacity levels and “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”

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Ref: ***Freight & National Passenger Operators Route Strategic Plan Feb 2018 Network Rail***

Planning protection for freight site usage P33

Refers to issues with the imposition of environmental restrictions (eg noise and hours of activity) as a problem that can fundamentally undermine the utility of the site.” This would suggest that existing industrial locations would be more suitable rather than quiet rural ones.

2.7 The volume of night time traffic that will arise as set out in Table 13.25 of the ES (with knock on consequences for noise) is not immediately clear from the transport data presented and should be explicitly set out within the TA, with appropriate cross-referencing to the ES. Table 13.30 of the ES summarises 18 hour traffic flow increases. i.e. 6am to midnight. Since Table 13.25 sets out the traffic increase for the night time period there is currently no clear assessment of the night time traffic impact (between 12-6). The Applicant should consider providing an assessment comparing traffic increases for different periods of the day, evening and night rather than time averaging the increases across the 18 hour period.

Ref: File reference TR050005 West Midlands Interchange (WMI)

Status Final Author Louise Evans

Date 7 September 2017

Meeting with Four Ashes Limited (FAL)

3.0 Desk Top Assessment Connectivity Strategy Officer

Transport and the Connected County Staffordshire County Council

Email dated 18th Oct 2018

To demonstrate the unsuitability of immediate surrounding roads 4 miles A5 heading west towards Telford from Gailey.

3.1 The collision history at the staggered crossroads at Ivetsey Bank and the stretch of the A5 adjacent to the petrol filling station has been analysed. In 5 years of complete personal injury data (2013-17) six collisions were recorded (1 serious and 5 slight) however only four of these occurred in the last 3 years. Of these four collisions 2 occurred at the staggered crossroads and 2 outside the filling station. All four collisions involved different vehicle manoeuvres. It is generally the case that a minimum of three personal injury collisions at one location with a common treatable pattern occur prior to commencement of further investigations therefore this location will continue to be monitored.

The 85th percentile speed of vehicles over a 12 hour period using this section of the A5 is 56

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mph.

This data indicates that as might be expected there has been an increase over time in the volume of traffic using this section of the A5, which forms part of Staffordshire's Strategic Highway Network. There has also been a 2% increase in the proportion of HGVs in the total traffic flow although this is still considered fairly low for an A class road of this type. The 85th percentile speeds from 2018 show that the majority of traffic is travelling within the posted National speed limit.

4.0 (Ref: Freight Strategy for the County of Staffordshire Nov 2018) Impact of HGV's on the Local Network and Rural Areas P14

4.1 The small proportion of HGV traffic that is using the rural network inappropriately however is of considerable concern to local communities.

HGV's are particularly unsuited to narrow rural roads. The most frequently cited causes of concern raised by local communities relate to:

- 'rat running' through rural areas to avoid congestion or to take a more direct route;
- subsidence and damage to highways;
- noise and impact on the tranquillity of the rural area;
- the size and speed of vehicles and an increase in perception of vulnerability for pedestrians, cyclists and people horse-riding;
- damage and erosion to verges, walls, hedgerows, other vegetation and tree canopies over narrow lanes;
- damage to buildings and other structures;
- congestion and blockages to roads;
- difficulties in crossing roads and dangers to children playing in rural communities where there is a regular flow of HGV traffic;
- dust pollution; and
- mud and other hazards on the highway.

5.0 Email 18th February 2018 from AJ Maiden – Director of Maidens Haulage following report of speeding HGV.

"We will always use the shortest route to get from A to B as long as it is safe to do so and there are no restrictions. We very often use the A5 to get to the M6 North as do many other transport companies delivering into Telford. Many other transport companies do the same, as this is the

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shortest route. We would be travelling an additional 15.4 miles if we were to use the M54. On average 35 of our vehicles will travel north on a daily basis, that would be an additional 539 miles per day and over 140,000 additional miles per year, not good for our carbon footprint.”

6.0 A Strategy for the A5 2011-2026

A449 Gailey (Staffordshire) to A508 Old Stratford (Northamptonshire)

December 2013

Background

6.1 (1.3) The Strategy covers a 62 mile section of the A5 from Gailey in Staffordshire to Weedon in Northamptonshire. The route is varied in nature, with heavily trafficked “urban” sections around Cannock/Brownhills and Nuneaton/Hinckley, and more lightly trafficked “rural” sections west of M6 Junction 12 in Staffordshire and South of the DIRFT.

6.2 Objectives of the Strategy

(2.2) The high level objectives of this Strategy relate to the national imperatives set out in the Government’s recent White Paper on Transport, ‘Creating Growth, Cutting Carbon’. This focuses on delivering a transport system which is an engine for economic growth, but which is greener, safer and improves quality of life for communities.

2.3 Based on these imperatives, the objectives of the Strategy are:

1. To ensure that the A5 is fit for purpose in terms of its capacity and safety, both now and in the future;
2. To allow the A5 to play its full and proper role in supporting and facilitating economic activity and growth at a local and national level;
3. To promote and facilitate access to leisure and tourism within the area covered by this strategy;
4. To assist in identifying the priority improvements along the A5 corridor that are needed to enable growth, **reduce congestion, improve safety**, improve air quality and deliver a sustainable transport system; and
- 5. To reduce, where possible, the impact of traffic on communities along the A5.**

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6.3 Description of the Route.

(4.2) The standard of the A5 varies from dual to single carriageway. There are frequent changes in standard along some sections of the route with numerous roundabouts, priority junctions, private driveways. Along some sections of the single carriageway route there are limitations for overtaking opportunities in terms of forward visibility, junction proximity and opposing traffic flows. The route is also constrained by a number of canal and railway bridges and Scheduled Ancient Monuments.

6.4 A5 “A” Road Stretch between Gailey Island and A41 at Pickmere Island.

Along certain sections, the A5 operates less as a trunk road and more as a local route providing function for industrial and local traffic travelling a short distance along the A5 in order to access employment, education/training and health facilities (Brewood, Penkridge & Wheaton Aston Medical Practices). This is true of the above section of the A5 following the detrunking order of April 1995.

Traffic flow data taken from 2012, 2015 and 2018 has indicated the following:

Total 12hour (7am-7pm) 5 day average vehicle flows in the vicinity of the petrol filling station have risen from 8089 in 2012 to 9923 in 2015 and up to 10391 in 2018; (Ref: Desk Top Assessment Connectivity Strategy Officer

Transport and the Connected County Staffordshire County Council

Email dated 18th Oct 2018).

This leads to high levels of turning movements at junctions, which can result in delays, congestion and accidents.

The above A Road is not included in the Strategy and it is this part of the A5 that is used for, not only local traffic but also for rat-running vehicles and HGV's travelling from the A41 or Telford to the M6 North Junction 12 or vice versa. See email referenced above from AJ Maiden:

“We will always use the shortest route to get from A to B as long as it is safe to do so and there are no restrictions. We very often use the A5 to get to the M6 North as do many other transport companies delivering into Telford. Many other transport companies do the same, as this is the shortest route. We would be travelling an additional 15.4 miles if we were to use the M54. On average 35 of our vehicles will travel north on a daily basis, that would be an additional 539

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miles per day and over 140,000 additional miles per year, not good for our carbon footprint.”

Indeed since 2012 the proportion of Heavy Goods Vehicles travelling the on this section of the A5 in a 24 hour period has risen from 8% to 10% in 2018. (Ref: Desk Top Assessment Connectivity Strategy Officer Transport and the Connected County Staffordshire County Council Email dated 18th Oct 2018).

The additional traffic on this stretch of the A5 is of particular concern. This is a dangerous stretch of road and the table above shows a 51.8% increase in HGV travel along the route. Although this A Road section of the A5 is not covered by the Strategy above, many of the statements included can be alluded to and are factual of the nature of this section.

7.0 There are constraints in terms of Ancient Monuments including:

Stretton Aqueduct. Fig 1.



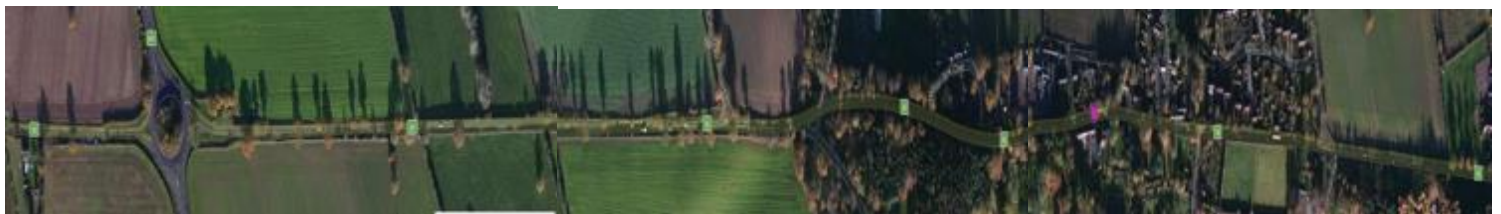
A short cast iron canal aqueduct between Stretton and Brewood and near to Belvide Reservoir. Designed by Thomas Telford and bearing his name and date of construction 1832. It carries the Shropshire Union Canal 30 feet above the A5 at a skewed angle, Larger HGV's often travel in the centre of the carriageway to get underneath the structure which is Grade II listed. Canals and Rivers Trust have confirmed that there are some condition reports against it.

The above strategy 3.10 Environmental Policy covers the Floods and Water Management Bill and will encourage more sustainable forms of drainage for new developments. As stated above this section is not covered by the strategy and drainage beneath the Aqueduct is insufficient and is prone to flooding.

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Stretton Bridge - carries Watling Street over the River Penk. Circa 1830 stone chamfered, rusticated ashlar. Three segmental arches with chamfered voussoirs up to roll moulding and parapet over, cambered over length of bridge with plain coping. Documents exist relating to road improvements in this area of which the bridge almost certainly was one. The asset was previously listed twice also at List entry 1294982. This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Fig 2 A5 From Gailey towards Weston and unsuitability of the road for increased HGV movements.



Pickmere Island A41

A5 East A Road

Weston Under Lizard- road narrows here in both directions and unsuitable for HGV's. who's wheels often go over the double white lines and hit each others wing mirrors when passing. 40mph speed limit.

Fig 3.

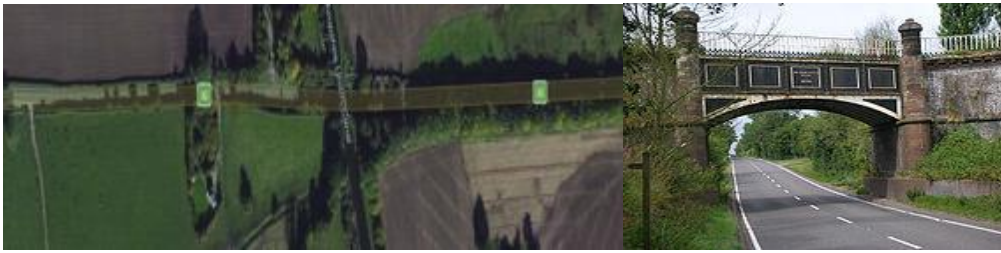


Wheaton Aston /Bishops Wood Junc

A5 heading east A Road

A5 heading east showing very few turning points or suitable diversion routes.

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A5 heading east showing where Stretton Aqueduct is situated. Road through Stretton narrows and there is a 50mph speed limit.

Thomas Telford Stretton Aqueduct

Fig 4.



A5 heading east at Gailey Island. Showing Claygates Road Junction



Crash Map view of Claygates Road Junction to Gailey - a vulnerable accident spot.

Fig 5.

Many of the properties along this detrunked section of the A5 lie directly next to the road and homes vibrate from HGV's. Some of the residences date from the 17th century and are extremely sensitive to vibration from traffic and HGV's. The section is used as a rat-run currently for traffic travelling from Telford or the A41 as a cut through to the M6 at J12. It is often used as a diversion route when there are incidences on the M54 or M6 and can become gridlocked.

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Jan 2019 - This happened as a result of a driver losing concentration and demonstrates how close to the road and how vulnerable some of our homes are in the nearby area. The vehicle just missed the oil tank and the house and the driver was inches away from death from a concrete plinth that sheared through the vehicle.



8.0 Referring to Figure 1 in our Rail Report, there are other locations on the WCML that are more suitable.

The above Strategy for the A5 identifies priorities where investment to heavy rail along or adjacent to the A5 will be focused set out within Network Rails High Level Output Statement (HLOS) and Route Utilisation Strategies, along with Transport Plans and documents such as The West Midlands Regional Rail Development Plan. These will include:

Nuneaton – Coventry – Leamington Spa improvements including platform lengthening at Bedworth, new stations at Arena, Kenilworth and Bermuda and new platform bay at Coventry. Improvements to stations in the Trent Valley, Birmingham, Leicester and Birmingham – Lichfield corridors.

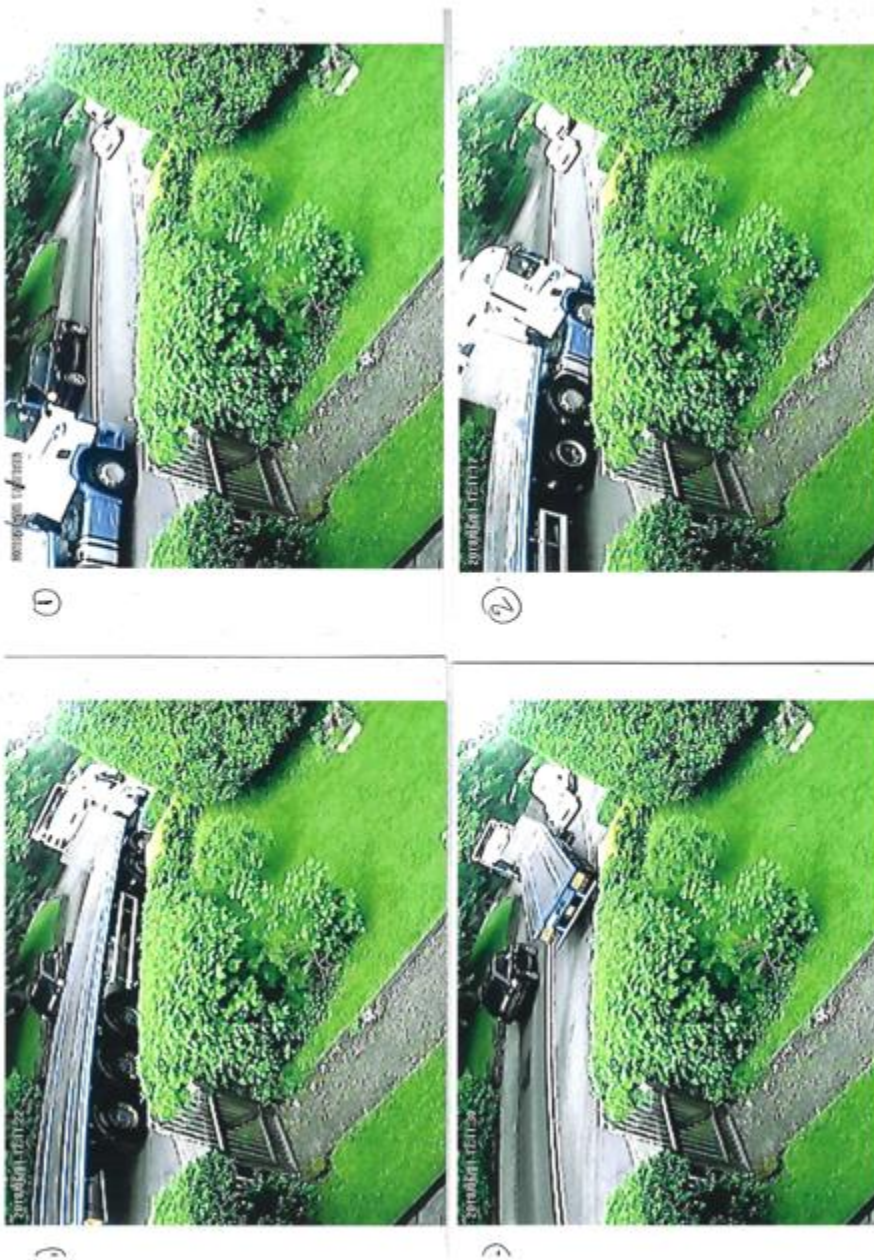
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8.1 Statement T13 in the Strategy – Sustainable Freight Distribution – The A5 Transport Group will:

help safeguard existing and redundant rail facilities for future use and support access to existing rail freight facilities and, subject to planning and environmental constraints, their expansion.

Will encourage new development, which is likely to generate significant freight movements to be located in areas that have good access to the rail network.

Below Photos taken June 2018 on the A5 (detrunked) Weston- Under-Lizard Where Road Narrows.



Photo's taken between 2016 & 2018 M6/A5

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9.0 The M54 was built to alleviate traffic on the A5.

1973 Debate on M54

“I want to speak briefly about two particular sections of the A5. Ivetsey Bank and Weston-under-Lizard are both accident hazards. Ivetsey Bank crossroads are on the crest of a hill. Something must be done about that, and done soon. But perhaps the most crying need of all is for the village of Weston-under-Lizard. This charming and delightful rural spot is an obvious candidate for a bypass, and for some 50 years a by-pass has been on the cards and pressed for by local people. Surely the time has come when their pleas and prayers should be answered. Every walk taken in that village is almost a walk with death. The peace of the area and the nerves of its people are shattered. Will my hon. Friend give a little hope that these people will be able to live in an atmosphere of tranquillity, calm and safety?”

“The attitude, on environmental grounds, of the CPRE and the important article in Country Life in the summer served to underline this dissatisfaction. The reason was the fact that the landscape through which the southern route would carve its way is of quite outstanding quality. I do not want to expand upon its beauties at great length because I want to leave time for my hon. Friend the Member for The Wrekin to make some comments. But it is a beautiful landscape. I should like to mention one or two places. There is Chillington, within my constituency, which with its wonderful Capability Brown landscaped park and the countryside around is one of the gems of rural England. The whole area between my home village of Brewood and the neighbouring village of Codsall is tremendously attractive. In my hon. Friend's constituency, around Tong, the gems are there for all to see.”

[HANSARD 1803–2005](#) → [1970s](#) → [1973](#) → [December 1973](#) → [19 December 1973](#) → [Commons Sitting](#) → [ORDERS OF THE DAY](#)

ROADS (CANNOCK)

HC Deb 19 December 1973 vol 866 cc1531-44

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10. MILESTONE REPORT

The information on Roads available to the Public was inadequate for a proper analysis and the Group therefore commissioned Milestone to review the Application. Their Report is attached. They conclude that the inconsistencies, lack of evidence and fundamental flaws in the documents submitted by the Applicants means that the conclusions sought to be drawn by them cannot be considered acceptable. The Inspector is therefore invited to conclude that the Application should be rejected on this ground alone.

11. In Conclusion

According to National Policy for SRFI's should be placed in appropriate locations, in the main to serve London and the South East. WMI is not connected to an extensive trunk road network or near to a major conurbation. The A5 heading west from Gailey to Priorslee in Telford was detrunked in 1995 and, in places, where the road narrows, is highly unsuitable for HGV's and has not been considered in the traffic impact assessments.

Statement T9 in the Strategy for the A5 2011 – 2026 Delivery of Sustainable Growth in the A5 Corridor states that where possible, major development sites should be located close to existing public transport services and interchange facilities.

Ref: ***Freight & National Passenger Operators Route Strategic Plan Feb 2018 Network Rail Pg 31 States that:***

“SRFI's are typically 60Ha plus in size. As the Network Rail freight estate lacks locations of this scale in the UK's distribution heartland, such facilities are typically privately developed on third party land.

They feature extensive on-site commercial warehousing. This is necessary to attract retail customers given their business models and to generate returns sufficient to justify the rail infrastructure investment costs. “

We believe that WMI will not function as an SRFI given the plans to develop warehousing first. It is simply not close enough to the point of sale of the goods to minimise secondary distribution. and consequently will generate greatly increased traffic on the highways and village road network in the area, whilst bringing no, or only marginal, benefits in the form of modal shift.

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The low unemployment in the area will result in increased traffic from employees commuting from outside the area leading to increased rather than reduced, carbon emissions and congestion.

An additional (estimated) 20,000 vehicle movements per day would be generated with the majority predicted to use J12 of the M6. All traffic will have to use the A5 (de-trunked in parts) & A449. The Applicant has failed to demonstrate the effects that perturbation of these very critical arteries will have on the surrounding village roads.

To increase the traffic flow from the proposed rail hub on to the A5 or the M6 is a proposal not remotely justified within such a green belt area.

We are losing our green status in South Staffordshire and allowing more and more traffic on these A roads and it is increasing pollution tremendously, looking at what hedging we still have along the A5/A449, it is black with pollutants.

ROAD SAFETY The proposed works to the local road network will have the effect of increasing traffic on some country lanes and through the centres of villages; they will not, as the Applicant contends; reduce it. The proposed weight limits on a number of country lanes are not enforceable and are likely to be ignored. There is a significantly increased risk to the safety and wellbeing of local residents from increased carbon emissions, light, noise and heavy traffic on unsuitable roads and the consequential rat-running.

For this proposal:

Will the use of rail freight be optimised?

Has rail trunk haul been maximised in comparison to alternative sites?

What elements of secondary distribution have been minimised?

Is the proposal likely to reduce the cost to users of moving freight by rail?

Will trip mileage of freight movements on both the national and local freight networks be reduced by the proposal?

If these questions were applied to this proposal, most fail. It is simply not close enough to the point of sale of the goods to minimise secondary distribution.

Published May 2016 Motorists' body the RAC The number of traffic police enforcing the law on West Midlands roads has fallen dramatically.

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The RAC warned lives were being put at risk after the Government revealed the number of traffic cops in the West Midlands has fallen by a quarter over five years. It means there are 87 fewer traffic police than in 2010. West Midlands Police had 351 road traffic officers in 2015 but that figure had fallen to 264 last year, a reduction of 25 per cent.

Forces across the country have been struggling to cope with funding cuts and many others also cut traffic police numbers. In Staffordshire the number of traffic police fell by 20 over five years and West Mercia Police cut traffic police numbers by 31. *Birmingham Mail April 2015* The most congested road in the West Midlands is the M6 interchange with the M54, which takes commuters into Birmingham from the north according to research by traffic information company TomTom.

2018 there is only one patrol car covering the whole of South Staffordshire. Parish Council Police Forum Jan 2019.

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It must be noted from below, the plans in Mid Cannock for a road/rail freight interchange depot. Pentaver. Plans approved and rail electrified.

