

Planning Act 2008 – Section 88

and

The Infrastructure Planning (Examination Procedure) Rules 2010 –
Rule 6

**Application by Four Ashes Limited for the West Midlands
Interchange Strategic Rail Freight Interchange.**

**Written Representations following the Preliminary Meeting by
Deadline 2**

**Subject of this Submission:
Highways and Movement Issues**

**Campaign to Protect Rural England (Staffordshire Branch)
Inspectorate reference for this representee: 20015574**

Additional comments of CPRE (Staffordshire)

In our initial representation we said;-

Highways and Movement Issues

We have concerns as to the impact of the road traffic likely to be generated by the scheme in the area and the wider network

We objected (first bullet point):-

- To the lack of a written assurance from the County Highway Authority that it is satisfied that the scheme will not adversely affect residents and other highway users on the A449 through Penkridge, the A5 to the West of Gailey, the A5 to the east of J12 (particularly in the Bridgetown area of Cannock) - each of which will carry additional traffic.

We have seen the Applicant's document¹ included in the application

We have searched the Inspectorate's database for representations from the Staffordshire County Council as Local Highway Authority. We found initial representations and the response to ExA's questions for response by the first deadline but nothing relevant to the issue which we, and others, have raised. We have not found a Memorandum of Understanding, or anything similar, from Staffordshire County Council, as Local Highway Authority to say that that it is satisfied that the scheme will not adversely affect residents and other highway users on the A449 through Penkridge, the A5 to the West of Gailey, the A5 to the east of J12 (particularly in the Bridgetown area of Cannock) - each of which will carry additional traffic.

As the ExA has already heard, there are local concerns as to the increased traffic which will travel north on the A449 via Penkridge. We acknowledge that the Applicants have put forward a scheme to monitor HGVs to and from the site using the A449 to/from the north but, as we said in our representation by the ExA's first deadline, we question the feasibility and practicality of this and would comment that it would only cover HGVs and would not include other vehicles nor would it include construction HGVs or sites within the SRFI without ANPR cameras fitted and monitored.

All traffic leaving the site and travelling west on the A5, (both of which must also use Gailey roundabout) would not be monitored. We would suggest that the Inspector might visit the Gailey roundabout in the early morning to see the existing traffic flows and balance of vehicle types. Travelling along the A5 to the west of the roundabout would also indicate why residents have concerns about the additional traffic likely to use the route.

¹ APPENDIX Q: TRAFFIC FLOW TURNING DIAGRAMS OF LOCAL AREA USING SSVM DATA <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR050005/TR050005-000429-ES%20TR%20App%2015.1%20-%20TA%20App%20Q%20-%20Traffic%20Flow%20Turning.pdf>

We have not seen any comment from the Highway Authority on the impact of additional traffic to and from the site using the A5 east from M6 Junction 12 where there is already significant congestion to the south-west of Cannock.

Second bullet point

- the additional traffic envisaged and an indication of how much spare highway capacity would remain on the M6 and M5 to the south of J12 if the scheme was approved and implemented

The Highways Agency appears to have concerns - but these are rather vague and can only be construed from what was said at the initial session of the Examination on the 17th February and their representation made between the first session and the first deadline.

Third point:-

The site is some distance from its likely labour supply and it would be anticipated to be a major employer. The site is served by an hourly bus service Wolverhampton - Stafford but not at all from Cannock or Telford.

We object:-

- To the absence of assured sustainable public transport provision as the preferred mode for the long term for all employees – not just those unable to afford, or unwilling/unable to use, private vehicles.

We accept that the applicant is proposing to remedy this as set out in its Travel Plan² and obligations document. We would only comment that the number of staff expected to use the enhanced public transport will remain a small proportion (8%) of the whole, even allowing for the full implementation of the Sustainable Transport Package.

Table 6: Peak Period Forecast Modal Split Target (Journeys to Work) at Full BuildOut, incorporating Sustainable Transport Package

TRAVEL MODE TARGET MODE SHARE CHANGE (% MODE SHARE)

Car Driver 73%	-10
Car Passenger 12.5%	+5
Bus 8%	+5
Bicycle 4%	-
Train 1%	-
Motorcycle 1%	-
Walking 0.5%	-

- Target mode share for 'car passenger' and 'bus' are indicative

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR050005/TR050005-000420-ES%20TR%20App%2015.1%20-%20TA%20App%20H%20-%20Site%20Wide%20Travel%20Plan.pdf>

Note:- We recognise that these may not be issues on which the ExA has sufficient concerns to warrant a public session to question the Highway Authorities or the applicant – but we hope that there will be such a session.