

Dear Mr Singleton

Re Planning Application TR050005

With respect to the above planning application to build a Rail Freight hub at Four Ashes, Gailey, near Wolverhampton. I wish to oppose this application on a number of grounds.

I am a lay person who lives in Brewood and asked questions at the daytime meetings you ran at "The Molineux", Wolverhampton on February 27th2019 related to the above application. I registered myself as an interested party with one of your Planning Inspectorate colleagues at that venue. As a lay person I do not have the resources at my disposal to investigate every aspect or detail of this potentially seriously damaging application which threatens people's and our environment's health and safety. I hope that the concerns I raise in attempting to get the application rejected will not be trivialised as a result of being a lay person.

Throughout this objection to the application I provide Internet links to recent press articles from The Guardian, The Times and The Telegraph that support my objections and provide further reference points from Government(s) and renowned and respected institutions/organisation and individuals. These searches illustrate the issues that air pollution is causing people and the broader environment. Further Internet searches provide other such evidence to support my application but I won't bog you down in what shows About 404,000,000 results (0.47 seconds) when "Googling" Air Pollution.

The following are my main objections to the proposal but also wish to **support and reinforce the views of the Snub the Hub group plus those of local councils and others that also oppose the application.**

- 1. The loss of the land proposed, which is designated as "Green Belt", should retain such "protected" status. The loss of such land is unacceptable. Without this land the application cannot proceed. The proposed area of land that would be lost directly to the proposed development is substantial and will impact on individuals, businesses, nature, well-being and recreation, ways of life and communities in various and both broader and specific ways. Please see, for example:**

https://www.theguardian.com/environment/2019/mar/22/ukmiss-almost-all-2020-nature-targets-official-report-admits?CMP=Share_iOSApp_Other

Various UK Government(s) and its Ministers seemingly continually erode Green Belt in their ambition to support strategic and other projects (e.g. HS2) but in doing so contradict and override laws and policies regarding the environment and consequently fail to reach their own and international targets it has agreed to meet. **It is time that arguments against the loss of environment** (and their potential impact if such applications are approved) should **outweigh those of business, entrepreneurial opportunism and competitiveness/development** (at any cost).

Discussion about finding alternative access to the proposed site by road transport should not be considered as, should alternatives be found, it would still result in the loss of the proposed site as "Green Belt" land and the destruction of environment. An authority at the Molineux meeting stated that it would not be possible to provide direct access to the proposed site from the M6. **The loss of Green Belt land is unacceptable** (particularly when "Brown Field" area within 50 miles are potentially available).

2. Increased traffic and associated pollution and its effects on people's health and the environment.

The key 24 hours a day/7 days a week impacts of this are:

- Increased levels of air pollution (which is not bounded by physical boundaries) from the hub and its associated vehicles (transport and workers') and its effect generally and specifically on the environment and people's long term health and cause of premature death. **Let's be clear that air pollutants are actually typically poisons and/or carcinogens.**
- Increased levels of noise pollution and its effect on the environment and people's health resulting in premature death.
- Increased levels of visual pollution – the size of the buildings and overall development will impact the horizon for miles.
- Increased levels of light pollution at night from the hub and its associated vehicles affecting wildlife (particularly nocturnal animals) and households.
- Increased levels of traffic congestion and grid-lock.

A related and realistic assumption is the potential future attraction of industry/businesses relocating to a transport hub and loss of further Green Belt and consequent increase in traffic/pollution/adverse health/environmental impact. It is well known that industry relocates to areas where there are seemingly better transport links – evidenced, for example, at the M5's Junction 6, Sixways development.

It is estimated that an additional 18,000 + vehicles will be travelling into and out of the site each day. Most of these vehicles, depending on the direction they are coming from, will access the site from the M6 onto the A5, from the M54 onto the A449 or from the M54 onto the A460 and thence onto the A5. These 18,000 vehicles will be in addition to already heavy traffic flow in this part of South Staffordshire. We have heavy traffic on the M54 and A5 heading for Telford, Shrewsbury and on into North Wales. The section of the M6 from Junction 8, the M5 junction, to the A500 at Stoke on Trent is one of the busiest sections of motorway in Europe. Incidents on the M6 causing traffic to leave at junctions 10A and 11 are not infrequent. Local road users are accustomed to having to divert onto the back lanes to avoid snarl-ups on the A449, A5 and A460. Another Brewood resident, Nick Wiley, has sent you a screen shot of one day on which traffic diverted off the M6 caused a traffic jam along the A5 to Gailey island and thence along the A449 to Junction 12 at Stafford South. This is not an unusual occurrence. **All these issues bring pollution and disruption closer to residential populations and given the 24/7 operation of the proposed development will be an incessant intrusion into residents' daily lives.**

The development of the new spur/link motorway from the M54 to join the northbound M6 at a location that effectively neighbours the proposed development site will further add to traffic and its associated issues around the application's development area. **This factor needs to be considered as part of the overall impact on the area when considering the application.**

The 18,000 vehicles mentioned do not include those vehicles used by those coming to the site to work. Unemployment in South Staffordshire is - and historically has been for many years - very low, well below the national average. Workers at the site will therefore not be local but will drive to the site from Wolverhampton, Cannock, Birmingham, Walsall and, further north, from Stafford and Stoke on Trent. To get to the site they will use the M6, the A5, the A449 and the A460 plus "rat-runs" when these routes are congested which they typically are – the very roads which are already very busy and will also take the 18,000 vehicles a day bringing goods to and from the rail freight hub. With an estimated 10,000 workers needed once the site is up and running, this is a potential 10,000

more vehicles each day travelling to and from the site at peak times.

Lorry drivers will presumably sleep in their lorries (either close to or on the proposed site) at rest times during the 24 hour site operation or queue whilst waiting to load/unload – all with their engines running to keep the lorries' cab and other services running, thus increasing air and noise pollution.

Whilst the lorries may be kept out of the smaller lanes, some will inevitably use them as shortcuts; undoubtedly though, workers in their cars will use those smaller roads as “rat-runs” and cause further congestion, increase pollution and the potential for further accidents on poorly maintained roads in rural communities.

Air pollution

As long ago as the 1960s it was known that lead, a component of petrol the and until the mid 1980s (when it was being phased out in the UK). It was found in micro amounts in people's blood and found to be contributing to brain damage and behavioural health issues in people; children particularly. Such effects were pernicious and chronic – the effects of current-day vehicle emissions (and other sources of air pollution) have similar and other effects on the health of people of all ages and impacts from birth in medically pernicious and chronic ways in a variety of forms which are well document by Governments, including the UK's, its agencies and renowned research establishments and organisations (e.g. World Health Organisation (WHO)) and by eminent scientists – the evidence is irrefutable but there is little action enforced by the UK Government to eliminate the risks it or even to control or curtail it as any attempt to is seen to affect our economic growth. The human cost is high but ignored as is the need by the Government to invest in the health of the Country's population that increasingly suffer air pollution's long term effects. Again it is a case of too little too late as far as the health and Nation's environment is concerned. **Despite the money being spent on research to clean up “diesel vehicles”, that research has largely reached a dead end for cars and no alternative, viable, across-the-board fuel/technology for lorries that will be used to transport cargo to and from the proposed site is even close to being found/developed.**

Concerns are increasingly raised locally, nationally and internationally about the impact of traffic-created air pollution on the brain development of young children as well as on the overall health of children and adults, especially the elderly. Many of these health problems are of a pernicious and long-term nature, for example increased rates of asthma and other respiratory conditions and lead to premature death. I am sure you will be aware of all these concerns, but for your information I attach several recent internet reports, online news and newspaper articles that refer to the impact of air pollution on children and adults and reference the informations' reputable sources:

<https://friendsoftheearth.uk/clean-air/what-are-health-effects-air-pollution-children>

<https://www.cleanairday.org.uk/air-pollution-and-children>

<https://www.blf.org.uk/support-for-you/signs-of-breathing-problems-in-children/air-pollution>

<https://www.telegraph.co.uk/science/2019/03/12/air-pollution-killing-nearly-many-people-smoking-britain/>

<https://www.telegraph.co.uk/news/0/toxic-air-lowers-life-expectancy-20-months/>

<https://www.bbc.co.uk/news/health-47709074>

This latter article which is about increased levels of paranoia amongst teenagers in areas of high air pollution is particularly worrying given the current concerns about mental health issues in children and young adults.

The study appears in **JAMA Psychiatry** and Scientists from King's College London tracked some 2,000 teenagers living in urban, semi-urban and rural areas.

There are numerous schools and nurseries within close proximity of the proposed development. Distances given for this first group are from the Four Ashes public house on the corner of Station Drive and the A449 (see list below). **The children at these establishments will carry the additional detrimental pernicious health effects associated with the increased air pollution throughout their life once their sensitive respiratory, vascular and nervous systems have become damaged by pollutants and poisons.**

Lilliput Day Nursery, School lane, Coven 0.8 miles (close to the A449)

St Paul's C of E First School, Coven 0.9 miles (close to the A449)

St Mary and St Chad C of E First School, Brewood 2.4 miles

St Dominic's Grammar School, Brewood 2.4 miles

Brewood C of E Middle School, Brewood 2.4 miles

St Mary's RC Primary School, Brewood 2.5 miles

All the above Brewood schools lie in the angle created by the A449 and the A5 Watling Street

Stretton Lodge Day Nursery and Pre School 3.5 miles (close to the A5, Watling Street)

Havergal C of E Primary School, Shareshill 3.8 miles (close to the A460)

There are also the following Penkridge schools. Distances given are from the Gailey roundabout, the junction of the A449 and the A5, Watling Street

Turtles Childrens Nursery 2.2 miles

St Michael's First School 2.5 miles

Marshmallows day care 2.6 miles

Marshbrook First School 2.6 miles

Princefield First School 3.0 miles

Wolgarston High School 3.1 miles

Penkridge Middle School 3.1 miles

All the Penkridge establishments are very close to the A449 as it passes through Penkridge. In the case of the two day nurseries, they are located on the A449 itself.

Children who attend most of these schools will not only go to nursery or school in the area but will also live close by, so their proximity to areas of high traffic pollution will be 24/7 (St Dominic's Grammar in Brewood is the exception to this as it is an independent day school and its pupils are drawn from a wide geographical area.) – **air and noise pollution will not be limited to the physical boundaries of the proposed development site, it will be all-pervasive**

It was mentioned at the public meeting at the Molineux that the percentage of Penkridge children who have asthma is high and I hope that someone has been able to get you the statistics on this that you asked for at the meeting. **Similarly I hope you have been able to find out why the air quality monitors were removed from key roads in the proximity of the application/development area and the data which they had provided, when they were in place.**

Wildlife and the Green Belt

I refer you to the link below which leads to an article on the UK's failure to meet targets relating to our natural environment and its wildlife.

https://www.theguardian.com/environment/2019/mar/22/ukmiss-almost-all-2020-nature-targets-official-report-admits?CMP=Share_iOSApp_Other

Extract from the above link....

The UK will miss almost all the 2020 nature targets it signed up to a decade ago, according to a **report by the government's official advisers.**

The nation is failing to protect threatened species; end the degradation of land; reduce agricultural pollution; and increase funding for green schemes, the assessment concludes. It also says the UK is not ending unsustainable fishing; stopping the arrival of invasive alien species; nor raising public awareness of the importance of biodiversity.

The targets were set in 2010 by the global Convention on Biological Diversity (CBD) and the report from the joint nature conservation committee (JNCC) found insufficient progress was being made on 14 of the 19 targets.....

The above article speaks for itself. Loss of habitats is the main cause of reduced numbers of different species worldwide. We are cog in a World that must take responsibility for its environmental destiny and we must be seen, both locally and as a nation, **to do our part in hitting the targets of the global environmental agenda or be increasingly known as environmental hypocrites.**

The proposed development is in an area of, mainly, farmland where trees, hedges and fallow land provide habitats for a large variety of animals, birds and insects. These may not be on any list of endangered species but the loss of any wildlife is to be avoided and the loss of plant life and thus photosynthetic capacity will also contribute to the decline in air quality.

The land and immediately adjacent areas also provides significant recreational opportunities for sailing, cycling, shooting, kayaking and canoeing, recreational barges, walking (including rights-of-

way). These facilities are important to local, and not so local, people's interests and, as such, their well-being.

The surrounding environment (land/water/air) would also become polluted (even if not from primary polluting accidents but secondary pollution such as particulates carried by rainwater runoff) as a consequence of pollution from the Hub's development and those areas' wildlife will suffer/be poisoned/die prematurely).

This and previous governments pledged not to encroach upon Green Belt areas but to look for Brownfield sites wherever possible. I am certain that a suitable Brownfield site could be found in an area of high unemployment where the possibility of 10,000 jobs would be welcomed. Unfortunately, as we know, Brownfield sites bring with them additional costs in sanitising the land to prepare it for reuse and this can be the reason why such sites are often rejected by potential developers because preparing the land before building will eat into the profits the development can accrue. **Recycling, restoring and regenerating land should be a primary planning goal.**

Some other links to articles and extracts evidencing the issues raised above are given below

<https://www.telegraph.co.uk/news/2018/09/27/air-pollution-kills-six-million-people-every-year-time-us-wake/>

Air pollution kills six million people every year: it's time for us to wake up to this grave threat

- [DANIEL KASS THE TELEGRAPH](#) 27 SEPTEMBER 2018 • 9:08AM

The government was applauded for its draft Clean Air Strategy, published in May, when it recognised that air pollution is now the leading environmental risk to human health in the UK and for setting out policies to reduce that harm.

It is currently estimated that air pollution will make 2.4 million ill in England between now and 2035. And the health and social care costs of air pollution could reach £18.6 billion by 2035.

However, critics have expressed concern that key policy areas, such as road transport, are not fully addressed in the strategy – potentially limiting the health benefits that could be realised.

(Telegraph headline) - Pollution | The invisible killer)

Source: World Health Organization-

- 570,000 children under 5 years die from respiratory infections, such as pneumonia, attributable to indoor and outdoor air pollution and second-hand smoke — smoke that is released by burning tobacco products, such as cigarettes.
- 361,000 children under 5 years die due to diarrhea, as a result of poor access to clean water, sanitation and hygiene. 270,000 children die during their first month of life from conditions that could be prevented through access to clean water, sanitation and clean air.

- 200,000 deaths of children under 5 years from malaria could be prevented through environmental actions, such as reducing breeding sites of mosquitoes.
- 200,000 children under 5 years die from unintentional injuries attributable to the environment, such as poisoning.

Source: World Health Organization

<https://www.telegraph.co.uk/science/2019/03/12/air-pollution-killing-nearly-many-people-smoking-britain/>

Air pollution kills nearly as many people as smoking in Britain each year, new figures have shown.

Although it was previously thought that emissions were responsible for around 40,000 deaths in the UK, new figures suggest it is closer to 64,000, just 18 per cent less than the 78,000 deaths caused by tobacco.

A further 29,000 deaths in Britain were also linked to air pollution which exacerbated other conditions such as cancer, diabetes and chronic lung disease.

Globally, dirty air from vehicle exhausts, factories and power plants causes more deaths than smoking, accounting for 8.8 million deaths a year, compared to the 7.3 million people that die from inhaling smoke.

<https://www.telegraph.co.uk/news/0/toxic-air-lowers-life-expectancy-20-months/>

Exposure to indoor and outdoor air pollution is almost as dangerous as smoking, reducing life expectancy by an average of 20 months, according to a major study.

The report, the State of Global Air, is the latest in a slew of evidence on the links between air pollution and poor health.

It shows that breathing toxic air – both inside and outside the home – will cut the life expectancy of a baby born today by an average of 20 months, compared to a 21-month fall in life expectancy in a smoker.

Worldwide, air pollution contributed to nearly five million deaths from stroke, heart attack, diabetes, lung cancer and chronic lung disease in 2017.

<https://www.thetimes.co.uk/article/the-times-view-on-councils-and-clean-air-live-and-breathe-wkz150xd7>

LEADING ARTICLE March 11 2019, 12:01am, the times

The Times view on councils and clean air: Live and Breathe

Councils must join ministers in fighting the scourge of air pollution

Air pollution is an invisible killer. The noxious gases and sooty particles emitted by car exhausts have been linked to lung cancer, strokes, respiratory problems, heart disease and even dementia. These pollutants are estimated to cut short some 40,000 lives in Britain every year and they have serious, life-long effects on the health of children. After too many years of inaction, the government is starting to wake up to the problem. Today, public health officials are sensibly recommending that local councils take action too.

<https://www.thetimes.co.uk/article/millions-breathing-unsafe-polluted-air-on-the-way-to-doctor-s-surgery-kdzmkk0c3>

Millions breathing unsafe, polluted air on the way to doctor's surgery

Kat Lay, Health Correspondent

February 11 2019, 12:01am, The Times

A third of patients have to go to areas that breach air pollution limits in order to see their GP.

Nearly 18 million patients are registered at surgeries in areas that exceed the World Health Organization (WHO) annual limit for fine particulate matter, analysis found. The particles, known as PM2.5, are small enough to pass through the lungs into the bloodstream and have been linked to heart disease, stroke and lung cancer.

There is also evidence that exposure exacerbates asthma and may increase the chances of diabetes, neurodegenerative diseases such as dementia and babies born with low birth weights.

Penny Woods, chief executive of the British Lung Foundation, said that it was “just not acceptable that nearly 18 million people are breathing unsafe levels of...

<https://www.thetimes.co.uk/article/rising-cost-of-pollution-revealed-in-plan-to-tackle-toxic-air-nj9p7mxm8>

Rising cost of pollution revealed in plan to tackle toxic air

Ben Webster, Environment Editor | Kat Lay, Health Correspondent

January 14 2019, 12:01am, The Times

Air pollution is costing Britain hundreds of millions of pounds more in damage to health than ministers had previously admitted.

The government's air pollution strategy, published today, includes for the first time the full costs of childhood asthma, heart disease and other debilitating conditions caused by toxic air.

The strategy says the measures it contains will cut the health costs of air pollution by £1.7 billion a year by 2020 and £5.3 billion by 2030. These figures have been increased since the publication in May of a draft of the strategy, which estimated that the same measures would cut costs by £1 billion a year by 2020 and £2.5 billion by 2030.

This suggests that for many years the government has been seriously underestimating the...

<https://www.thetimes.co.uk/article/air-pollution-traffic-fumes-linked-to-teenage-psychosis-study-finds-tw9swg20w>

Teenage psychosis linked to air pollution in cities for first time

Chris Smyth, Health Editor

March 28 2019, 12:00am, The Times

Teenagers living on [polluted roads](#) are about 40 per cent more likely to be psychotic, the first study of its kind finds.

[Air pollution](#) goes a long way to explaining why adolescents in cities are twice as likely to suffer psychosis as those in rural areas, researchers said.

While the study does not prove that traffic fumes cause psychosis, experts said it added to mounting evidence that dirty air can do [far-reaching damage](#) to the brain and lungs.

Fine particles and nitrous oxides in the air have long been known to cause breathing and heart problems. Evidence is emerging that they can contribute to depression and [dementia](#).

In the latest study, researchers have used data on 2,232 teenagers....

Thank you for reading my objections to the application. I sincerely hope that you provide advice to the Government's Minister, that will, even after potential appeal, lead to the rejection of the application.

Yours sincerely

Glen Singleton