

MR A M GENT. Reference 20015682

Written Response re:- West Midlands Interchange Project – TR05005

I will organise my response into three separate sections.

Section 1. Is there really no alternative using Brownfield sites within the Black Country Area.

The developers submission makes various referrals to sections in the NPS document which mention the possibility of use of Green Belt land in very exceptional circumstances

I would suggest that they are taking advantage of the chance to use Green Belt land and attempting to manufacture “very exceptional circumstances”. They have published a list of alternative sites, all within South Staffordshire, and it may well be that the Four Ashes site is the best of all these. In the consultation overview document in paragraph 8.2.2 they talk about the need for an SRFI to serve South Staffordshire and the Black Country, going on to say that this coupled with the lack of alternative sites means that very special circumstances do exist to develop an SRFI in the Green Belt. So although they have published the alternative sites within South Staffordshire, nowhere have I seen an analysis of possible sites within the Black Country area. They do mention at one point the difficulty of achieving a site of sufficient size and refer to Table 4 in the NPS document. I assume they are referring to the last section of this table which refers to local terminals not providing the scale economies and operating efficiencies necessary. Clearly as an individual I do not have the resources available to the developing consortium in order to look for alternative sites within the Black Country area. However anyone travelling between Penkridge and Birmingham can't fail to notice the number of (possibly suitable) brownfield sites. Although any one of these might not have the size of the Four Ashes site I can't see anything in Table 4 that precludes the use of 2 or 3 sites close together with a central control. Technology today could easily cope with such a situation and make it equivalent to one large site. Yes it may well be more expensive, and the developers may not make the

same high levels of profit, but that hardly counts as the “very exceptional circumstances” needed to justify the use of Green Belt land.

Section 2. Use of rail links

In her statement of 2011 Justine Greening stressed the increasing importance of rail for transporting goods across the country and justified the creation of SRFI's to facilitate this. She highlighted reduction in Carbon emissions and reduced congestion on roads, both noble sentiments but will they be realised. The general feeling of those I have talked to, and that includes Civil Engineers who have worked on big projects, is that developers and land owners are just using the National Policy to bypass Green Belt planning restrictions and have no interest in the advantageous use of railways for transporting goods. The fear is that we will end up with a (previously) green belt area full of warehouses with a massive increase in HGV traffic to service the area and little or no use of the railway facilities. It is difficult finding information on how this might work but I did some quick research into the East Midlands hub at Castle Donington. They have a freight rail link with a terminal by the M and S warehouse. It is difficult to find official information on the usage of this rail line but I found two forums used by rail enthusiasts that stated categorically that no trains had used this line. This may be fake news but I would say it is well worth investigating in order to ensure such a situation does not occur with the Four Ashes site.

Section 3. Traffic through Penkridge and improvement of Cycle provision

This section is written very much from the perspective of a Penkridge resident. Despite the proposed safeguards put forward by the developers, residents of Penkridge feel there is every likelihood of increased HGV traffic through the village if the Four Ashes development goes ahead. This would especially be the case if(as frequently happens) there is a blockage on the M6 between junctions 12 and 13. In such circumstances it becomes very difficult for residents of Penkridge to get from West to East(or vice versa) across the A449. I would suggest that extra roundabouts, lights, are needed somewhere in the centre of

the village, where the Bradley road hits the A449 and possibly where New Road meets the A449.

In the govt NPS document, paragraph 3.16 states “As part of the govt commitment to sustainable travel it is investing in developing a high quality cycling and walking environment to bring about a step change in cycling and walking across the country. In paragraph 3.17 there is an expectation that developers identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use the junctions. I would like to identify some opportunities, that as far as I can see the developers have ignored, both within Penkridge itself and between Penkridge and Gailey. The developers proposals are given in section 7 of the planning document, and several parts of this are (deliberately?) hazy. It seems that most of the provision is south of Gailey although they seem to be trying to imply that it will stretch north. Paragraph 7.8 reads “ Currently there is a segregated shared cycle/footway route provided adjacent to both the western and eastern sides of the A449. This route has recently been improved and is provided to a width of 1.5m. These routes provide access to the site and Penkridge to the north. Street lighting is provided along this section of the A449, which within Penkridge is overlooked by residential housing “ Reading this you could be forgiven for thinking that from the centre of Penkridge to Gailey there is a dual usage 1.5m upgraded path, while in reality nothing could be further from the truth. I have been shouted at by pedestrians, more than once when cycling along the pavement through Penkridge, and the only sigh of any double usage is around the roundabout at the end of Wolgarston way. Between the new housing development and Gailey island I would say the poorly surfaced path varies between 50cm and 1m wide and I have attached some photos to illustrate this. Could I suggest that if the development goes ahead the developers take the opportunity to improve the cycle facilities between Penkridge Station and Gailey Island to join up with the cycleway south of Gailey. Paragraph 7.21 talks of improvements along the A5 and south of Gailey but nothing north to Penkridge. The last point in paragraph 7.29 talks about widening and resurfacing along the canal towpath, to afford alternative quiet connections between Station Road and for those wishing to travel from

further afield. Could I suggest that this would be a perfect way for Cyclists and walkers to travel from Penkridge to the site, and a great opportunity for the developers to demonstrate their sustainable transport credentials. The developers talk about workers cycling from Penkridge to the site which again is a laudable aim. For this to be a realistic aim, then the improvements to the suggested route are essential, but also an easy way of crossing the A449. Most cyclists coming from or going to the station would use St Michaels Rd and the crossing at the top is very difficult and potentially dangerous. Would a Cycling/Pedestrian bridge at this interchange be a possibility? Or failing that some form of lights/crossing. Once across you still have to navigate the roundabout at the end of Wolgarston Way which is difficult and again potentially dangerous.

Conclusion. I have heard many people within Penkridge saying what is the point in making a submission as the whole thing was stitched up years ago, and the evidence of road works and quarry workings suggest that this is the case. I sincerely hope that this is not true but with little cause for optimism, and of course if this goes ahead it will make it easier for the next set of developers to use Four Ashes as a model for their destruction of Green Belt land. Even worse if it just bespoils our already overcrowded island with vast plantations of warehouses and to what benefit?





