

From: [REDACTED]
To: [West Midlands Interchange](#)
Subject: TR05005 Response for Deadline 4th April 2019
Date: 04 April 2019 20:58:19

Project Ref TR050005 Interested Party 20015602 Problems of Air Quality and Noise Pollution

This submission is made in support of TR050005 00604 and others on the same subject of air quality.

A family member is a [REDACTED] in the permanent medical care of [REDACTED]

[REDACTED] For him poor air quality is an obvious problem and real danger. It will remain so for life.

Defra produced their Clean Air Strategy in 2018. Figures show an overall improvement of air quality since 1970 which is encouraging but even that achievement demands such standards are continually improved and not allowed to fall.

The problems of traffic pollution are still evident and the continued expansion of congestion charges in cities is sufficient proof. Congestion does not only occur in towns and cities but also in pockets in the more rural areas. This area is one such affected. The A5 Transport Group Study comprising the Highways Agency and all local authorities along the A5 between Gailey and Weedon produced a report to define a strategy and action plan for the road from 2011 to 2026. Congestion and air quality were obvious subjects. They identified areas where air quality was consistently below UK and EU standards which they then designated as Air Quality Management Areas (AQMA). Unsurprisingly they coincided with congestion and slow moving traffic in warehouse areas.

The AQMA nearest to the proposed site is at M6 J12 just about 900 metres away and stretches beyond the Vicarage Road / A5 junction to Oak Farm just East of that point. It is now managed by South Staffs Council as Hatherton AQMA. Further AQMAs were identified at congestion points further east to the Cannock Eastern Orbital at the A460/A34/A5.

Vehicles will be using the A5 /Vicarage Road junction which will mean increased traffic queue congestion at the traffic lights with increased idling time of engines and the obvious adverse air quality impact. Any local traffic collecting from or delivering to the site along that part of the A5 will simply extend existing M6 J12 pollution and further East of M6 J12 into the other existing AQMAs.

The former Four Ashes chemical works was a polluter in the area with throat irritating fumes and black carbon dust (was used in Ever Ready dry batteries) spread around the areas of Brewood and Penkridge. That has now gone but was a perfect indicator of the source and wind direction from which it came. The factory pollution will now be replaced by a concentration of slow moving traffic and engine revving of manoeuvring lorries building up concentrations of exhaust pollution and particulate matter (PM).

High buildings create a vortex often visible through litter being lifted into the sky. This site will have a number of such buildings drawing dust and traffic particles into the air to be deposited in the same manner as black carbon dust.

On the opposite side of the A5 to the site at the south east corner of the Rodbaston Campus two wind turbines have been erected. The surrounding land is flat and the perfect place for them to operate in prevailing wind conditions. They are entirely visible from several points along the A449 approaching Penkridge from M6 J13, along the B5012 in Penkridge, Pillaton, Mansty and the adjacent Cannock Chase AONB near Shoal Hill, from the Shoal Hill pub car park and Sandy Lane. If their location suits that operation it shows the vulnerability of those flat surrounding areas to invisible windborne traffic pollutants replacing the past black carbon dust. They also make useful perspective benchmarks as to what intrusive high buildings will be visible from the AONB and its approaches. It is also worth noting that disguising buildings against the skyline is not good for pilots using the

private Otherton airfield just over a mile away. There are also frequent military, police and air ambulance flights over the area. It is hoped that part of the accompanied site visit will be to make a practical view both outwards and inwards of the AONB to see a realistic total environmental intrusive impact on the surrounding areas.

The M6 runs alongside the Wolgarston Way at Penkridge with only few yards between the motorway barrier fence and the village road which is also the B5012. Increased traffic means extra exhaust pollution and there will be extra particulate matter from high speed warm tyre and road surface wear. Air quality concerns are such that a further AQMA monitors are installed in Wolgarston Way and at the M6 Teddesley Rd bridge. Even if WMI traffic is successfully banned from Penkridge via the A449 the additional M6 traffic will be an additional and alternative polluter.

The Littleton Colliery Huntington was sited about the same distance from Penkridge as the proposed site. The land between all three points of the triangle is flat. Night time and early morning marshalling of coal trains was distinct and intrusive. Correlation co-efficient between the rail activity of the two sites has to be positive and spells a regressive return to those nights and days.

The company's perceived ability to ban traffic through Penkridge is woeful. Believing drivers will not ignore unenforceable tenancy conditions, ANPR and technology as yet uninvented is naïve. There will be considerable daytime traffic pollution especially on congested market days. That and the additional particulate matter from normal driving such as braking, tyre and road wear will add to local pollution increases.

During periods of recent overnight M6 upgrade closure traffic nuisance problems became acute with Highways Agency and Staffs CC staff each wringing their hands in despair and passing responsibility for solutions to the other. Penkridge got a "Please be Considerate" road sign. We know by experience overnight traffic brings noise problems of HGV air brakes at the B5012, drivers playing loud music, blowing horns, headlight flashing and calling to each other from open window cabs. All will further reduce Penkridge quality of life. There is also the well known pollution of litter and human waste now associated with overnight parking away from provided rest areas which are often chargeable.

Sadly the FAL attitude to pollution was ambivalent and seen as a long term problem to be solved by society as a whole. I can only conclude they had and still have no answers to any problems of which they might cause on this subject as with most others.

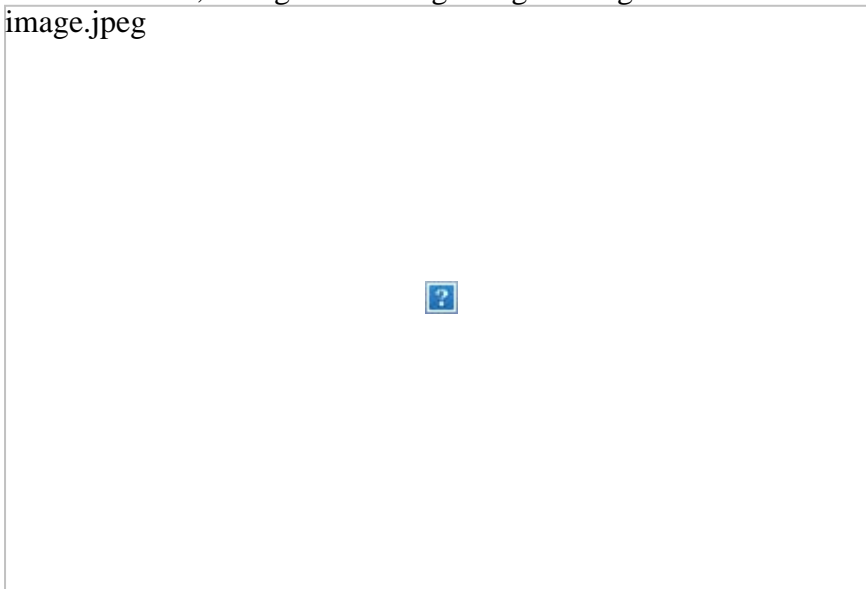
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From: 
To: [West Midlands Interchange](#)
Subject: TR050005 Response for Deadline 4th April 2019
Date: 04 April 2019 20:34:44

Project Ref TR050005 Interested Party 20015602
Use of Green Belt Agricultural Land as Rented Industrial Units

This submission supports TR050005 000604 and others on the same subject. The land within the Four Ashes Ltd (FAL) application is currently in agricultural use. There is nothing in the application or other documentation of which I am aware to say that the land has for any reason become unsuitable for its continued successful use in that capacity. The satellite image shows the wide extent of agriculture in which the rough triangle of proposed land formed by the M6, A5 and A449 sits. The existing industrial content of the land is limited in comparison to its much wider agriculture picture. It also illustrates the site and the proposal as an isolated place of employment especially for 24/7 shift working except by car. Filling that triangle with industrial buildings would be out of overall context, losing much and gaining nothing.

image.jpeg



In its Vision for the Future of Farming report the National Farmers Union states “British farming delivers on every level. In monetary value - for every £1 invested in farm support - farming delivers £7.40 back to the UK economy. Our industry is the bedrock for the country’s largest manufacturing sector – food and drink – a sector worth £108 billion and one that employs nearly four million people”.

This clearly underlines the importance of the sector to the UK economy. The image underpins the breadth of surrounding land in relation to the South Staffordshire farming economic contribution.

The proposed change to industrial and logistics units offered for rental cannot be considered under the heading of diversification as this will be a major change of use and any possible return of the land to its existing use or use that might be connected with agriculture or country related pursuits will be lost for good.

My family history is long service railway employment with GWR and its successors from the mid 19th Century. I want to see the rail industry succeed but everything has its place. Using railway history as a reference, the land was in the possession of a Squire Monckton almost 200 years ago when his permission was given in 1833 for the railway to cross his land. Annual census returns from 1841 onwards show high levels of agricultural employment there. Earlier old maps and OS Maps to the present show a continuity of the area’s wide agricultural landscape. Apart from the unknown origins of the former now

redeveloped gas tar distillery and the Four Ashes Industrial Estate the evidence is to confirm its history and present as overwhelmingly farming.

There are crossover conflicts with Green Belt policies which apply to this application. Midlands Connect Strategy: Powering the Midlands Engine 2017 promotes brownfield sites for industrial development in North Staffordshire which fits into the National Planning Policy Framework 2019 “making as much use as possible of brownfield sites” (para 117).

This is echoed in the Chancellor’s Spring Statement to Parliament on 13th March 2019 which has the following words “...ensuring that the delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity.”

Biodiversity is not a subject in which I claim any expertise and hand that over to specialists. I am a wildlife lover, a supporter of organisations of that nature and a long time National Trust member. Common sense prevails that if uncontaminated open land is covered by concrete and steel then valuable pollinators and wildlife will be lost and far from mitigated by the now customary planners fanfare announcements of landscaped community parks. In this instance their relevance is questionable anyway. Existing local small communities will disappear because of the development and there are no others nearby whose access to natural areas such as Cannock Chase is not already well used. There is a fear that these community parks could become isolated havens of anti-social behaviour and criminal activity.

The rail segment should be the key to this application but more of the application is concerned with a complete estate of road accessed adjacent warehouses and industrial units with no need to have connection to the rail side.

The M6 Junction 12 in South Staffordshire could be considered as the start point for almost continual agricultural activity reaching far into Wales except for Telford and Shrewsbury. This site almost adjacent to the motorway junction predates it by hundreds of years and is that very start point.

The handwritten label on the plans of Gailey Roundabout showing the road to the West as the A5 Arterial Road is 35 years out of date. That has been superseded by the M54. This is just another attempt to make the area look more industrial at the important road connection.

All planning must to fall in line with what is now Government policy as mentioned in earlier relevant paragraphs above and those concerned with post development phase land restoration and mitigation.

Good intentions to reduce transport damage including those regarding the struggling rail freight industry can also lead to the law of unintended consequences. Failure is here non-reversible. This proposal is not a brownfield site with some possibility of a second chance remediation. This is good agricultural land within its own industry and surroundings with sadly a greater predicted contribution to the economy than its proposed declining rail transport replacement (less than 10 years ago by 2023) . If the rail terminal does not flourish or even never gets built on the excuse of poor trade, it will have no effect whatsoever on the growth of any road warehouses or industrial units approved on the back of it.

It is isolated and will require car travel to work also contrary to the 2019 policy. It is well known that South Staffordshire District Council oppose this project and would not have approved the warehouses as a local application on Green Belt grounds alone. Biodiversity and local quality of life is endangered by approval of a project whose basic requirement to build a rail terminal need not succeed even to its first development stage capacity. If approved it can become a collection of speculative road served warehouses and/or unspecified industrial units out of character with its environment adversely affecting local and wider quality of life and in therefore direct conflict with latest declared Government policy on infrastructure development. It would set an unnecessary dangerous precedent against Green Belt Policy.

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