Deadline 2 - 17/11/2020

Dear Messrs Jackson and Stone,

Thank you for allowing me to contribute to the examination. In Part One of this document I have given a synopsis of the A449 issues that I am concerned about. In the second part of this document I have analysed the applicant's submission and the examination to date with discussion and questions. Part Two is grouped into three themes: the A449, potential kettle holes and the applicant's plan disclaimers.

I pose a total of 15 questions in this document. The questions are allotted to parties in the following way:

- **The Examining Authority:** Questions 1 -3, 7, 12, 14 and 15
- **Highways England:** Questions 4 (A & B), 6, 8 - 11, 13 and 14
- **Four Ashes Ltd.:** Question 5
- **Staffordshire County Council:** Question 14
- **The Staffordshire Wildlife Trust:** Question 14
- **Natural England Question**: Question 14

1. Synopsis - The A449 Issues:

The A449 between Junction 2 (J2) of the M54 and the A5 at Gailey is a 6 kilometre stretch of road which intersects the settlements of Coven Heath, Cross Green/Coven and Standeford. The A449 exerts a significant, adverse effect on the roadside communities that it passes through; this harm is principally caused by nuisance noise derived from high levels of vehicular movements along this dual carriageway. This is modified and amplified at the various priority and signal controlled junctions which intersect the road. These areas of intersection are where most of the vulnerable residential receptors are located (see Appendix 1 for examples).

The vast majority of vehicles using the A449 do so as it is the signed route between the M54 eastbound and the M6 northbound (and M6 southbound to M54 westbound). This **is** the existing, official route intended to be replaced by the proposed Development Consent Order (DCO).

In quantifying harmful acoustic effects, it is noted that the Examining Authority (ExA) of the M54-M6 link[1] have identified that:

> *"The Applicant has set out the SOAEL threshold at 68dB LA10, 18 hr based on the daytime trigger level in the Noise Insulation Regulations (see paragraph 11.3.41 of Chapter 11 of the ES [APP-050]). However, the World Health Organisation Environmental Noise Guidance (ENG) (paragraph 11.3.42)* ***strongly recommends*** *that noise from road traffic should be reduced below 53dB Lden."*

[1] In question 1.8.5 - Page A53 - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000620-8.10%20Applicant%20responses%20to%20ExAs%201st%20Written%20Questions%20(Version%201).pdf

There is no reason why this 53dB Lden threshold of acoustic harm should not able be wholly applicable to the A449. However, two separate sources of data identify that the A449's settlements and their sensitive residential receptors are currently experiencing, and will continue to experience, nuisance noise levels in excess of 70 dB LA10, 18h. The data demonstrating the levels of existing and future harm are derived from data in the applicant's submission[2] and the recently approved DCO for the West Midlands Interchange[3] (WMI).

The proposed DCO has the potential to significantly remedy the existing and future levels of acoustic harm experienced by sensitive A449 residential receptors by putting the right traffic on the right roads to improve residential wellbeing. It could do this by separating local community traffic from long distance and business traffic and reducing volumes of through traffic.

However, the applicant's submitted scheme has fundamentally misunderstood the A449's current and future usage and the additional highway mitigation/modification that is required beyond the red line of the Order limits of 'the scheme'. These shortcomings have occurred because the applicant has submitted erroneous data and propagated known mistruths in their transport and acoustic modelling. Furthermore, the DCO submission has fundamentally misunderstood the policy and legal objectives that are required to gain consent from the Secretary of State for Transport (TS).

2. The DCO Shortcomings – Analysis & Questions:

The A449

In response to my registration to participate in this examination as an interested party, the applicant[4] has advocated the following position:

> *"The operational traffic noise assessment* [for the A449] *has been completed based on the standard UK assessment methodology for road schemes set out in the DMRB. DMRB adopts a proportionate approach to assessment with* ***full CRTN calculations required within 600 m of new road links, or links*** *physically changed or* ***bypassed by the Scheme****. Full CRTN calculations have been completed for a 600 m study area around the Scheme and the existing A460 bypassed by the Scheme. For other road links more remote from the Scheme the assessment is normally based on the change in the 18-hour CRTN Basic Noise Level (BNL) i.e. the traffic noise level at 10 m from the kerb, considering the flow, % Heavy Duty Vehicle (HDV), speed and road surface."*

Question 1: Could the ExA confirm that they do not believe that the proposed DCO is intended to change or bypass the linkage provided by the A449 as the formally signposted route between the M54 eastbound and the M6 northbound (and M6 southbound to M54 westbound)?

Question 2: If the ExA take the view that the A449's current linkage role is intended to be 'bypassed' by the proposed DCO, is the ExA satisfied to assess the DCO without the *Calculation of Road Traffic*

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[2] Page 2 - https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/TR010054/TR010054-000458-DCO%20Updated%20Documents_Appendix%2011.5.pdf

[3] Appendix 6: https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/TR050005/TR050005-001250-Daniel%20Williams%20-%20Resposne%20to%20Deadline%208.pdf

[4] RR-032a – Page 63 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000580-8.9%20Applicant%20Response%20to%20Relevant%20Representations%20(Version%201).pdf

Noise[5] (CRTN) assessment criteria (specifically the parameters advocated by paragraphs 26, 27 and 33) being fully applied to the modelling of the A449's usage?

A comprehensive assessment of the A449's existing and future functionality should include an analysis akin to the level of detail that the WMI applicant provided in their DCO submission, specifically *Technical Appendix 13.5*[6] (an annotated version of this document is given in Appendix 2). Whilst I continue to dispute the reliability of some of that document's content and the analysis and conclusions inferred from it (see Appendices 3 and 4), the applicant for this DCO should provide comprehensive numerical data in a format which possesses the same layout and clarity as the WMI '*Technical Appendix 13.5'*. This examination needs to see a breakdown of vehicle types, uses in different parts of the day and baseline levels (without the link scheme in place).

Question 3: Why is the 1.8km section of A449 immediately to the north of J2-M54 missing from the applicant's Appendix 11.5[7] data/analysis? The applicant's *Figure 11.2 – Noise affected routes*[8] visually demonstrates this particular omission.

The applicant goes on to state in response to my registration as an interested party[9]:

> *"…The SoS for Transport considered that there is a clear justification for authorising the Proposed West Midlands Interchange (WMI) Development in the Department's letter dated 4th May 2020.*
>
> *In anticipation of this approval, Highways England considered that this proposed development at the WMI was 'more than likely' to be delivered and therefore specifically represented this site as approximately 743,000 sq m of mixed use industry and storage, and this was included as a modelled zone within the "Core" local traffic forecasts for the Scheme. Because this site was specifically represented within the local traffic model forecasts, the national trip end growth factors for other areas within the planning district were reduced to avoid the double-counting of economic growth.*
>
> *As a specifically represented local development site, the trip generations, trip distributions and highway infrastructure improvements associated with the WMI development site were included in the local traffic forecasting process. These forecast trip demands were then assigned onto both the 'Do-Minimum' (no scheme, but including the WMI roads) highway network and onto the 'Do Something' (with Scheme and including WMI roads) highway network."*

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[5] http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/14.%20Noise%20and%20Vibration/14.2.1%20-%20Department%20of%20Transport%20and%20Welsh%20Office%20Calculation%20of%20Road%20Traffic%20Noise.%201988.pdf

[6] WMI -Technical Appendix 13.5 - Operational Noise Assessment information https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000404-Doc%206.2%20ES%20Noise%20App%2013.5%20-%20Op%20Ass.pdf

[7] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000458-DCO%20Updated%20Documents_Appendix%2011.5.pdf

[8] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000255-TR010054%20M54%206.2%20Environmental%20Statement%20Figure%2011.2.pdf

[9] RR-032b – Page 63 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000580-8.9%20Applicant%20Response%20to%20Relevant%20Representations%20(Version%201).pdf

The applicant's single reference to the West Midlands Interchange (WMI) in the entire 97 page Transport Assessment (TA)[10], where it merely quotes a 2017 observation by Staffordshire County Council (Paragraph 1.6.15 – page 8), strongly adds to the impression that the WMI scheme has not been given full and considered regard by the applicant.

Furthermore, the applicant's highly evasive response to ExA question 1.10.1[11] has been noted. Why the applicant is unable to provide two simple tallies showing the A499's vehicle usage with and without the WMI variable in the event of this DCO being approved is baffling. I am in no doubt that the ExA will ask the applicant again to explain why they are obfuscating on matters of critical planning consideration, when they should be explaining and convincing in equal measure.

From comparing the applicant's A449 vehicle movement projections[12] with those of the WMI applicant's DCO consent[13] it is clear that the applicant has not taken account of the full effects of the WMI on the A499, either with or without the proposed scheme (M54-M6 Link) modelling projections. Table 1 (given at the very end of this document) has tabulated this data for comparison. Extracts from the original data are presented in Appendices 2 and 5 of this document. The primary sources can be found via the footnote referencing.

Question 4 - A: When the applicant's A449 modelling is contrasted with the WMI DCO data (see Table 1), can the applicant account for the 94.05% (22,009 actual) difference in daily vehicle movements in the late 2030s?

Question 4 - B: Why are the WMI, 2016 summaries of daily A449 usage significantly larger than the applicant's 'with' and 'without' [the proposed link road] projections for 2039?

The applicant was a contributing consultee in the WMI DCO examination and was statutorily obliged by *Department for Transport Circular 02/2013*[14] – Paragraph 5 to shape and contribute to the analysis of that scheme's transport modelling and provide support or objection where appropriate to its benefits and harm on the strategic road network:

> *"…The Highways Agency will issue advice that seeks to address matters arising from the planning process that have *the potential* to impact on the strategic road network but which may require some particular consideration."*

It important to note that if the applicant now wishes to question or distance itself from the validity of the WMI DCO transport modelling, they are by extension admitting that they failed in their statutory role during that DCO examination. Their DCO proposal on land 1.6 miles to the south east, will cost £200 million and was developed over the last eight years and yet it has failed to recognise the impact it would have on the strategic road network and the holistic relationship between the two schemes.

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[10] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000545-TR010054%20M54%207.4%20P05%20Transport%20Assessment%20Report%20Scheme%20Changes%20Tracked.pdf

[11] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000620-8.10%20Applicant%20responses%20to%20ExAs%201st%20Written%20Questions%20(Version%201).pdf

[12] Figures 3.15 and 4.12 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000545-TR010054%20M54%207.4%20P05%20Transport%20Assessment%20Report%20Scheme%20Changes%20Tracked.pdf

[13] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000404-Doc%206.2%20ES%20Noise%20App%2013.5%20-%20Op%20Ass.pdf

[14] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/237412/dft-circular-strategic-road.pdf

The WMI applicant/developer had absolutely no interest in exaggerating their likely intensification of vehicular movements and use of the A449. On the contrary is has been observed that the WMI applicant/developer deliberately falsified and lessened their projected utilisation of the A449 and the acoustic harm that was inferred to derive from that usage. As can be noted from the documents in Appendices 3 and 4 of this document, the deliberate falsification of data by Four Ashes Ltd. (the WMI developer/applicant) is the subject of an ongoing internal investigation by the Planning Inspectorate. That investigation is going to be of interest to Highways England, the ExAs for both DCOs and Four Ashes Ltd.[15] when its findings are published in the coming weeks.

Question 5: In the interim could Four Ashes Ltd. (the WMI applicant/developer) assist this examination by commenting on the three questions raised in Appendix 3 of this document to assist both Highways England and the ExA in working out the reliability and accuracy of the differing vehicle movement projections for the A449 in scenarios with and without this proposed DCO (the M6-M54 link)?

Question 6: Could the applicant clarify the nature and extent of the peer review that its transport modelling and the associated/inferred noise assessment underwent, prior to its submission into this examination?

Question 7: Could the ExA specify if it will receive any specialist, independent consultee assistance in relation to critiquing and stress testing the technical elements of the applicant's transport modelling and associated noise assessment? Whilst I do not question the integrity or competency of this ExA, I am mindful that most other areas of significant importance in this DCO are being scrutinised by organisations and individuals with very specific skill sets.

In response to ExA written question 1.10.9[16] the applicant said:

> *"The M54 to M6 link road will reduce traffic flows on the A449(T). This is indicated in the Transport Assessment [AS-114/7.4] at Table 4.5 and as stated in paragraph 4.6.11. A reduction of daily flows in the traffic forecasting year 2039 is indicated in Figure 4.12. The Scheme will meet its objective of reducing flows on the A449(T)."*

Question 8: In reference to Figures 3.3 and 3.4 of the TA[17], can the applicant explain why the A449 between J2 of the M54 and the A5 at Gailey was not subject to any bespoke ATC counts/calibration of the 2015 data in 2017?

Question 9: In reference to Figure 3.6 of the TA, why has no journey time survey analysis been undertaken to understand journey times on the A449 between J2 of the M54 and J12 of the M6 (and vice versa), both with and without the effect of the approved WMI link road being accounted for in the timings? Could the applicant please provide the existing and proposed north and southbound A449-A5 and A449-WMI link road trip times? Could data for the different hours of the day be provided rather than just 'sweeping' daily averages or selective 'peak hours'?

> *"…The A449 (T) is not only a trunk road but is also a signed primary route that carries north-south traffic movements from primary origins such as Wolverhampton to*

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[15] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000591-8.8%20O(B)%20Draft%20Statement%20of%20Common%20Ground%20with%20Four%20Ashes%20Limited%20(Version%202%20(P02)).pdf

[16] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000620-8.10%20Applicant%20responses%20to%20ExAs%201st%20Written%20Questions%20(Version%201).pdf

[17]- https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000545-TR010054%20M54%207.4%20P05%20Transport%20Assessment%20Report%20Scheme%20Changes%20Tracked.pdf

primary destinations such as Stafford. The route would therefore not only need to be de-trunked but also declassified by the Department of Transport and adopted by Staffordshire County Council."

Question 10: Why does the need to work with the Department for Transport and Staffordshire County Council to de-trunk or modify the A449 appear to be so problematic for the applicant? Have any informal or formal pre-submission discussions taken place to hypothesise the costs and benefits of de-trunking/physically modifying the A449? If they have, can written transcripts and minutes of meetings be placed into the examination for review?

The *National Policy Statement for National Networks*[18] (NPSNN) at paragraph 5.195 instructs that:

"The Secretary of State should not grant development consent unless satisfied that the proposals would meet, the following aims [AIM] *within the context of Government policy on sustainable development:*

- *Contribute to improvements to health and quality of life through the effective management and control of noise,* ***where possible****."*

In a scheme of this size and cost (£200 million plus) with the specific relieving objectives that it has set itself, it is not unreasonable to expect discussions to have occurred between the local highway authority (Staffordshire County Council) and the applicant, to explore the feasibility, costs and benefits of de-trunking and/or modifying the A449. The onus is on the applicant to provide a substantive case as to why it is not possible for them to significantly relieve the A449, else the ExA and TS will be forced to refuse the DCO.

"…It is noted that a trip between M54 Junction 2 and M6 junction 12 is 1.6 km shorter following a route via A449(T) and A5(T) than it would be following a route via the new M54 to M6 link road and the M6. Some trips would choose to use the latter route if there are perceived travel time benefits. However, if strategic trips to Primary origins and destinations were to be actively discouraged from using the A449(T) then this would result in longer journey lengths and a less transport economic efficient road network."

Question 11: 'Perceived' efficiency does not come across as a ringing endorsement of the scheme's likely effectiveness in relation to the A449. Is the actual difference in travel time improved or worsened when motorists use the proposed M54-M6 link rather than the A449/WMI link road? **Yes** or **no**?

Question 12: Motorists transiting north-south between Wolverhampton and Stafford will, at J2 of the M54 and J12 or J13 of the M6, be presented with exactly the same route choices as motorists making trans-regional journeys to and from other locations further to the west or south of J2-M54 and north or east of J12 & J13 of the M6. If the proposed link road is sub-optimal in terms of actual journey time and perceived ease of use when compared to the A449 for interregional motorists (movements between Stafford and Wolverhampton for example), why would transregional motorists not continue to preferentially use the A449 over the proposed link road? Does the ExA recognise the fundamental irrationality of the applicant's argument here?

[18] Paragraph 5.195 – Page 85
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387223/npsnn-web.pdf

Question 13: What is the applicant's estimated breakdown of the different journey types made along the A449 at present, in the year of opening and in 2039? i.e. what is the percentage of local traffic movements between A449 villages and Stafford or Wolverhampton; sub-regional traffic movements between Wolverhampton and Stafford (including the % non-WMI HGV movements), regional movements between Shropshire or Mid-Wales and northern Staffordshire/northern England or towns/cities to the east of Cannock (including the % non-WMI HGV movements) and standalone WMI movements (the % of HGVs and other vehicle associated with the facility)?

Holocene Peat Deposits

Aerial satellite imagery (see Appendix 6) shows several potential kettle holes[19] within or immediately adjacent to the proposed scheme. Kettle holes are relatively common across the northern and western Midlands where they were formed at the periphery of Devensian ice sheets during the termination of that Ice Age around 30 – 15 thousand years ago[20]. The possible kettle holes within and adjacent to the Order limits appear to be a separate and distinct collection of small pools and micro-meres, in comparison to the typically larger ones found to the north and west[21]. Their location and their southwest-northeast alignment correlates strongly with the south eastern extent of the hypothesised '*Wolverhampton Line*'[22].

Kettle holes are not only interesting geologic features in their own right, but also have the potential to hold datable, multi-millennial or even complete Holocene spanning[23] sedimentary and organic (peat) stratigraphies. These stratigraphies can contain multi-proxy records of fossilised tree/plant pollen, micro and macro insect remains, as well as other radio carbon-datable organic materials[24]. These fossilised materials have the potential to be used to infer detailed and unbroken estimations of vegetative, landscape and climatic changes and events from as early as 15,000 years before the present day right into the late medieval period[25]. Individual kettle hole proxy records can be cross referenced with other peat stratigraphies from across the British Isles and other regions in the northern hemisphere. Multiple records can then be further combined and contrasted with other paleo-environmental proxies, like speleothems and ice cores straigraphies, as well as the conventional archaeological record, to give incredibly powerful and detailed insights into the past. For these reasons kettle hole deposits are potentially very valuable, but they are completely finite and vulnerable to damage from human activity, particularly development like road building.

The study of Holocene peat straigraphies is not a new discipline[26] but it is an ongoing area of academic research[27] on sites near to the proposed scheme[2829]. If the features identified in Appendix 6 are kettle holes, sample coring, and where appropriate full coring, should be undertaken in order to capture and analyse any sediments/peat chronologies and the imbedded proxy records before they are damaged or lost during the proposed scheme's construction or its future function (for example by inducing harmful changes to the hydrologic regime of land within and around the Order limits).

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[19] https://en.wikipedia.org/wiki/Kettle_(landform)
[20] https://core.ac.uk/download/pdf/206339385.pdf
[21] https://www.jstor.org/stable/2560426?seq=1
[22] https://royalsocietypublishing.org/doi/10.1098/rstb.1973.0029
[23] https://en.wikipedia.org/wiki/Holocene
[24] https://nph.onlinelibrary.wiley.com/doi/pdf/10.1111/j.1469-8137.1990.tb00522.x
[25] http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.619.5211&rep=rep1&type=pdf
[26] https://jgs.lyellcollection.org/content/115/1-4/1
[27] https://www.researchgate.net/publication/239526299_The_Holocene_vegetation_cover_of_Britain_and_Ireland_Overcoming_problems_of_scale_and_discerning_patterns_of_openness
[28] https://www.keele.ac.uk/gge/studyatgge/postgraduatecourses/postgraduateprojects/quarternaryenvironmentsandpaleoclimates/reconstructingholoceneenvironmentalchangeinstaffordshire/
[29] https://core.ac.uk/download/pdf/18614442.pdf

No reference or recognition of the kettle holes and the potential for Holocene sediment/peat accumulations has been observed in Environmental Statement Chapters 6 (Cultural Heritage), 7 (Landscape and Visual) and 9 (Geology and Soils). Paragraph 9.9.9 – Chapter 9[30] specifically concludes by stating:

> *"Geology - No designated important geological exposures have been identified within 250m of the Scheme boundary. The sensitivity of geology across the Scheme is very low and is not of local interest. The magnitude of impact would be negligible as the overall integrity of the resource would not be affected. The Scheme would have a neutral effect on geology during Scheme construction, which is not significant."*

Question 14: Could the applicant, Staffordshire County Council, The Staffordshire Wildlife Trust[31] and Natural England please give their opinions on this matter? The ExA and other parties may wish to directly consult Dr Warren Eastwood[32] at the University of Birmingham, School of Geography, Earth and Environmental Sciences; he and his research grouping are locally based, world leading experts in this particular research field.

Scale Disclaimers

The majority of the applicant's submitted plans[33][34][35] contain a disclaimer in their top right hand corner which states:

> *"DO NOT SCALE FROM THIS DRAWING, USE ONLY PRINTED DIMENSIONS".*

Furthermore, almost all of the plans which contain the 'do not scale' disclaimer do not possess any figured or printed dimensions. Most parties and the ExA will need to make scaled measurements from the submitted plans; why should they be denied that capability? In the event of a future problem or even challenge in the courts, why should the applicant be given the potential freedom to be decoupled from the detail in the proposal? I recognise that the applicant may wish to prevent DCO examination plans which display information at the macro scale (in metres and kilometres) from being used inappropriately at the micro scale (cm and mm) by contractors in the event of an approval. However, it is observed that the submitted plans contain an additional disclaimer (in the bottom right hand corner) which states:

> *"THIS DOCUMENT HAS BEEN PREPARED PURSUANT TO AND SUBJECT TO THE TERMS OF AECOM'S APPOINTMENT BY ITS CLIENT. AECOM ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS ORIGINAL CLIENT OR FOLLOWING AECOM'S EXPRESS AGREEMENT TO SUCH USE, AND **ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED**."*

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[30] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000153-TR010054%20M54%206.1%20Environmental%20Statement%20Chapter%209.pdf
[31] https://www.staffs-wildlife.org.uk/nature-reserves/black-firs-cranberry-bog
[32] https://www.birmingham.ac.uk/staff/profiles/gees/eastwood-warren.aspx
[33] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000112-TR010054%20M54%202.4%20Works%20Plans.pdf
[34] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000118-TR010054%20M54%202.10%20Engineering%20Section%20Drawings.pdf
[35] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000113-TR010054%20M54%202.5%20General%20Arrangement%20Scheme%20Layout%20Plans.pdf

In the middle right of the affected plans the *'Purpose of issue'* is given as "*DCO APPLICATION*". I see absolutely no justification for the continued retention of the 'do not scale' caveat on the applicant's plans.

Question 15: Could the ExA confirm that it is content to allow the applicant to retain the scale disclaimer on the examination plans? If it is not content to do this, could it please instruct the applicant to amend them accordingly?

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APPENDIX 1

A449 Settlements

Photograph 1: Coven Heath.

Photograph 2: Coven and the Brewood Road Junction.

APPENDIX 2

West Midlands Interchange '*Technical Appendix 13.5 – Operational Noise Assessment Information*'

Document 6.2

The West Midlands Rail Freight Interchange Order 201X

Technical Appendix 13.5 - Operational Noise Assessment information

Regulation 5(2)(a)

Resound - July 2018

West Midlands Interchange

Four Ashes Ltd

Technical Appendix 13.5: Operational Noise Assessment Information

Table A13.5.1: Off-site daytime road traffic flows – 2021

Road	2016 baseline	2021 No development	2021 With development
M6 between Junction 13 and 14 (northbound)	64,931 (20.2)	80,202 (15.9)	80,579 (16.1)
M6 between Junction 13 and 14 (southbound)	64,322 (21.3)	83,765 (15)	84,586 (15.3)
A449 between M6 J13 and Pinfold Lane	13,794 (2.9)	16,997 (6.7)	19,001 (7.4)
Teddesley Road between Marsh Lane and Penkridge Road	3,371 (0.6)	3,521 (0.6)	3,521 (0.6)
Cannock Road between Wolgarston Way and A34	11,626 (1.3)	16,924 (6.7)	17,532 (7.9)
A5 between M6 Junction 12 and Proposed Site Access	20,898 (12.4)	23,153 (6)	32,828 (15)
A5 between Vicarage Road and M6 J12	18,795 (21.5)	19,851 (15.2)	23,982 (18.4)
M6 between Junction 9 and 10 (northbound)	89,882 (18.6)	131,524 (11.8)	132,228 (12.3)
M6 between Junction 9 and 10 (southbound)	82,497 (15)	106,575 (13.4)	108,165 (14.2)
A5 between Vicarage Road and A4061 Wolverhampton Road	20,468 (15.6)	22,632 (12.3)	25,425 (13.5)
A5 between A449 and Proposed Site Access	20,239 (15.1)	21,451 (7.1)	21,091 (11.6)
A5 between A449 and A41	14,047 (4.3)	18,840 (5.7)	20,039 (7.4)
A5 between A41 and A4640 Redhill Way	8,447 (4.3)	11,571 (10.1)	11,766 (11.3)
A449 between A5 and Gravelly Way (northbound)	9,228 (16.2)	11,842 (4.2)	12,237 (8.8)
A449 between A5 and Gravelly Way (southbound)	9,695 (15.2)	11,119 (3.6)	10,460 (9.2)
A449 between Gravelly Way and Station Drive (northbound)	9,888 (8)	10,737 (3)	15,698 (6.9)
A449 between Gravelly Way and Station Drive (southbound)	9,652 (9)	12,132 (3.1)	14,601 (10.7)
Vicarage Road between Site Access and A5	6,594 (6.8)	6,574 (7.4)	8,503 (21.9)
Straight Mile between Vicarage Road and Oak Lane	1,719 (0.6)	1,802 (1.4)	1,822 (1.8)
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	8,217 (5.3)	6,416 (7.4)	5,472 (11)
Station Drive between A449 and Enterprise Drive	9,604 (2.5)	10,299 (6.5)	9,084 (8.3)
Four Ashes Road between A449 and Claygates Road	2,048 (0.5)	2,163 (2.7)	2,289 (3.5)
A449 between Station Drive and Brewood Road (northbound)	13,987 (4.6)	16,030 (3.4)	18,644 (6.8)
A449 between Station Drive and Brewood Road (southbound)	15,129 (4.8)	15,957 (3.6)	18,561 (9)
Old Stafford Road between A449 and New Road	2,483 (2.4)	2,593 (2.4)	2,593 (2.4)
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	3,612 (0.5)	3,772 (0.5)	3,772 (0.5)
Poplars Farm Way between A449 and Lawn Lane	9,143 (0.6)	8,434 (2.6)	8,706 (2.4)
Lawn Lane between Brewood Road and Wobaston Road	4,860 (0.9)	5,075 (0.9)	5,075 (0.9)
A449 Stafford Road M54 J2 to Brewood Road (northbound)	11,535 (17.7)	14,074 (3.8)	16,415 (7.2)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	11,637 (16.5)	14,727 (4)	16,742 (9)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	15,413 (14.9)	18,161 (3.7)	20,035 (6)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	17,901 (13.9)	21,867 (3.5)	23,196 (5.9)
Wobaston Road between Stafford Road and The Droveway	21,284 (6.4)	27,688 (1.8)	27,947 (1.7)
A449 Stafford Road between Wobaston Road and A460	29,281 (13.7)	37,997 (2.7)	40,764 (5.2)

Road	2016 baseline	2021 No development	2021 With development
Church Road between A449 Stafford Road and Three Tuns Lane	959 (0.4)	1,001 (0.4)	1,001 (0.4)
Bargate Street, Brewood	2,772 (0.8)	2,895 (0.8)	2,895 (0.8)
Sandy Lane / The Pavement, Brewood	3,275 (0.6)	3,420 (0.6)	3,420 (0.6)
Coven Road, Brewood between The Pavement and Tinkers Lane	5,089 (0.6)	5,315 (0.6)	5,315 (0.6)
B5012 Wolgarston Way between Cannock Road and A449	9,298 (1.5)	8,195 (5.9)	8,927 (5.5)
A449 between B5012 Boscomoor Lane and Pinfold Lane	17,751 (4.2)	13,947 (9.7)	15,872 (8.5)
A449 between B5012 Boscomoor Lane and A5	20,929 (2.4)	23,763 (3.9)	25,352 (5.9)
Camp Road between Penkridge Bank Road and A34	3,796 (0.5)	3,964 (0.5)	3,964 (0.5)
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	5,329 (2.1)	5,565 (2.1)	5,565 (2.1)
A5 between A4601 Wolverhampton Road and M6 Toll	21,509 (7.1)	26,617 (15.1)	27,000 (15.8)
A4601 Wolverhampton Road between A5 and M6 Toll	16,151 (3.1)	19,336 (14)	19,431 (14.1)
A4601 Wolverhampton Road between A5 and Longford Road	15,995 (1.4)	16,142 (7.9)	16,365 (8.4)
Bursnips Road	9,295 (7.8)	9,884 (7.8)	9,884 (7.8)
M6 between Junction 10 and 10a (northbound)	65,938 (15)	106,332 (14.9)	107,915 (15.5)
M6 between Junction 10 and 10a (southbound)	65,319 (15.7)	100,505 (15.9)	102,556 (16.7)
M6 between Junction 12 and 13 (northbound)	55,282 (13.9)	74,917 (13.7)	76,274 (13.8)
M6 between Junction 12 and 13 (southbound)	54,763 (14.7)	80,561 (14.6)	82,427 (14.6)
M6 between Junction 11a and 12 (northbound)	61,415 (16.3)	73,071 (13.8)	76,953 (15.1)
M6 between Junction 11a and 12 (southbound)	60,839 (17.2)	75,796 (14.6)	79,352 (15.9)
M6 between Junction 10a and 11 (northbound)	47,615 (18.5)	61,541 (18.3)	63,490 (19.1)
M6 between Junction 10a and 11 (southbound)	47,169 (19.5)	57,444 (19.3)	59,692 (20.4)
A5 between A34 and B4154	27,668 (12.2)	29,014 (13.2)	29,018 (13.4)
Notes: All roads are two-way, unless stated otherwise. Data presented in the form of 18 hour AAWT flows with the percentage of HGVs in brackets			

Table A13.5.2: Off-site daytime road traffic flows – 2036

Road	2016 baseline	2021 No development	2021 With development
M6 between Junction 13 and 14 (northbound)	64,931 (20.2)	90,039 (15.9)	90,369 (16.1)
M6 between Junction 13 and 14 (southbound)	64,322 (21.3)	94,039 (15)	94,859 (15.2)
A449 between M6 J13 and Pinfold Lane	13,794 (2.9)	18,399 (6.7)	20,537 (7.3)
Teddesley Road between Marsh Lane and Penkridge Road	3,371 (0.6)	3,831 (0.6)	3,831 (0.6)
Cannock Road between Wolgarston Way and A34	11,626 (1.3)	18,320 (6.7)	18,937 (7.9)
A5 between M6 Junction 12 and Proposed Site Access	20,898 (12.4)	25,279 (6)	35,346 (14.5)
A5 between Vicarage Road and M6 J12	18,795 (21.5)	21,674 (15.2)	25,923 (18.1)
M6 between Junction 9 and 10 (northbound)	89,882 (18.6)	147,655 (11.8)	148,222 (12.3)
M6 between Junction 9 and 10 (southbound)	82,497 (15)	119,646 (13.4)	121,192 (14.1)
A5 between Vicarage Road and A4061 Wolverhampton Road	20,468 (15.6)	24,710 (12.3)	27,527 (13.4)
A5 between A449 and Proposed Site Access	20,239 (15.1)	23,420 (7.1)	22,843 (11.4)
A5 between A449 and A41	14,047 (4.3)	20,394 (5.7)	21,611 (7.3)

Road	2016 baseline	2021 No development	2021 With development
A5 between A41 and A4640 Redhill Way	8,447 (4.3)	12,525 (10.1)	12,706 (11.1)
A449 between A5 and Gravelly Way (northbound)	9,228 (16.2)	12,930 (4.2)	13,267 (8.5)
A449 between A5 and Gravelly Way (southbound)	9,695 (15.2)	12,140 (3.6)	11,300 (9)
A449 between Gravelly Way and Station Drive (northbound)	9,888 (8)	11,723 (3)	16,969 (6.8)
A449 between Gravelly Way and Station Drive (southbound)	9,652 (9)	13,246 (3.1)	15,771 (10.5)
Vicarage Road between Site Access and A5	6,594 (6.8)	7,154 (7.4)	8,864 (21.3)
Straight Mile between Vicarage Road and Oak Lane	1,719 (0.6)	1,961 (1.4)	1,982 (1.8)
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	8,217 (5.3)	6,982 (7.4)	5,831 (10.8)
Station Drive between A449 and Enterprise Drive	9,604 (2.5)	11,209 (6.5)	9,768 (8.2)
Four Ashes Road between A449 and Claygates Road	2,048 (0.5)	2,354 (2.7)	2,491 (3.5)
A449 between Station Drive and Brewood Road (northbound)	13,987 (4.6)	17,502 (3.4)	20,152 (6.7)
A449 between Station Drive and Brewood Road (southbound)	15,129 (4.8)	17,423 (3.6)	20,074 (8.8)
Old Stafford Road between A449 and New Road	2,483 (2.4)	2,822 (2.4)	2,822 (2.4)
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	3,612 (0.5)	4,105 (0.5)	4,105 (0.5)
Poplars Farm Way between A449 and Lawn Lane	9,143 (0.6)	9,179 (2.6)	9,452 (2.4)
Lawn Lane between Brewood Road and Wobaston Road	4,860 (0.9)	5,523 (0.9)	5,523 (0.9)
A449 Stafford Road M54 J2 to Brewood Road (northbound)	11,535 (17.7)	15,367 (3.8)	17,739 (7.1)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	11,637 (16.5)	16,079 (4)	18,110 (8.8)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	15,413 (14.9)	19,801 (3.7)	21,724 (5.9)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	17,901 (13.9)	23,842 (3.5)	25,198 (5.8)
Wobaston Road between Stafford Road and The Droveway	21,284 (6.4)	30,575 (1.8)	30,862 (1.7)
A449 Stafford Road between Wobaston Road and A460	29,281 (13.7)	41,589 (2.7)	44,411 (5.1)
Church Road between A449 Stafford Road and Three Tuns Lane	959 (0.4)	1,106 (0.4)	1,106 (0.4)
Bargate Street, Brewood	2,772 (0.8)	3,197 (0.8)	3,197 (0.8)
Sandy Lane / The Pavement, Brewood	3,275 (0.6)	3,776 (0.6)	3,776 (0.6)
Coven Road, Brewood between The Pavement and Tinkers Lane	5,089 (0.6)	5,869 (0.6)	5,869 (0.6)
B5012 Wolgarston Way between Cannock Road and A449	9,298 (1.5)	9,049 (5.9)	9,805 (5.5)
A449 between B5012 Boscomoor Lane and Pinfold Lane	17,751 (4.2)	15,265 (9.7)	17,134 (8.4)
A449 between B5012 Boscomoor Lane and A5	20,929 (2.4)	25,724 (3.9)	27,336 (5.8)
Camp Road between Penkridge Bank Road and A34	3,796 (0.5)	4,314 (0.5)	4,314 (0.5)
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	5,329 (2.1)	6,056 (2.1)	6,056 (2.1)
A5 between A4601 Wolverhampton Road and M6 Toll	21,509 (7.1)	29,021 (15.1)	29,288 (15.8)
A4601 Wolverhampton Road between A5 and M6 Toll	16,151 (3.1)	21,164 (14)	21,250 (14.1)
A4601 Wolverhampton Road between A5 and Longford Road	15,995 (1.4)	17,667 (7.9)	17,867 (8.3)
Bursnips Road	9,295 (7.8)	10,699 (7.8)	10,699 (7.8)

Road	2016 baseline	2021 No development	2021 With development
M6 between Junction 10 and 10a (northbound)	65,938 (15)	119,373 (14.9)	120,909 (15.4)
M6 between Junction 10 and 10a (southbound)	65,319 (15.7)	112,832 (15.9)	114,870 (16.6)
M6 between Junction 12 and 13 (northbound)	55,282 (13.9)	84,106 (13.7)	85,550 (13.7)
M6 between Junction 12 and 13 (southbound)	54,763 (14.7)	90,441 (14.6)	92,442 (14.6)
M6 between Junction 11a and 12 (northbound)	61,415 (16.3)	82,033 (13.8)	86,006 (14.9)
M6 between Junction 11a and 12 (southbound)	60,839 (17.2)	85,092 (14.6)	88,787 (15.7)
M6 between Junction 10a and 11 (northbound)	47,615 (18.5)	69,089 (18.3)	71,036 (19)
M6 between Junction 10a and 11 (southbound)	47,169 (19.5)	64,489 (19.3)	66,751 (20.3)
A5 between A34 and B4154	27,668 (12.2)	31,678 (13.2)	31,612 (13.4)
Notes: All roads are two-way, unless stated otherwise. Data presented in the form of 18 hour AAWT flows with the percentage of HGVs in brackets			

Table A13.5.3: Off-site night-time road traffic flows – 2021

Road	2016 baseline	2021 No development	2021 With development
M6 between Junction 13 and 14 (northbound)	8,246 (48.1)	10,191 (37.8)	10,366 (37.8)
M6 between Junction 13 and 14 (southbound)	9,456 (42.5)	12,322 (30)	12,563 (30.2)
A449 between M6 J13 and Pinfold Lane	1,051 (8)	1,295 (18.2)	1,529 (20.4)
Teddesley Road between Marsh Lane and Penkridge Road	176 (0.5)	181 (0.5)	181 (0.5)
Cannock Road between Wolgarston Way and A34	649 (1.5)	945 (7.7)	1,103 (9.4)
A5 between M6 Junction 12 and Proposed Site Access	1,482 (67.1)	3,402 (15.4)	5,418 (30.1)
A5 between Vicarage Road and M6 J12	3,678 (41)	3,884 (28.9)	4,972 (30.7)
M6 between Junction 9 and 10 (northbound)	11,069 (37.3)	14,524 (26.2)	14,932 (26.9)
M6 between Junction 9 and 10 (southbound)	14,221 (28.9)	20,512 (23.4)	21,010 (24.5)
A5 between Vicarage Road and A4061 Wolverhampton Road	2,240 (38)	2,508 (31.9)	3,293 (29.5)
A5 between A449 and Proposed Site Access	3,896 (42.3)	4,129 (19.3)	4,264 (25.2)
A5 between A449 and A41	1,104 (8.9)	1,482 (11.7)	1,789 (16.1)
A5 between A41 and A4640 Redhill Way	624 (8.5)	856 (20)	948 (24.8)
A449 between A5 and Gravelly Way (northbound)	398 (16.2)	1,703 (11.3)	1,911 (19)
A449 between A5 and Gravelly Way (southbound)	326 (20.1)	1048 (6)	1,249 (16.7)
A449 between Gravelly Way and Station Drive (northbound)	839 (16.7)	912 (6.2)	1,732 (12.9)
A449 between Gravelly Way and Station Drive (southbound)	1,201 (24.7)	1,511 (8.6)	2,137 (23.3)
Vicarage Road between Site Access and A5	541 (14.9)	540 (16.2)	1,643 (29.9)
Straight Mile between Vicarage Road and Oak Lane	88 (0.9)	93 (2)	98 (2.5)
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	629 (11.8)	492 (16.5)	732 (18.9)
Station Drive between A449 and Enterprise Drive	735 (5.6)	789 (14.3)	994 (16.2)
Four Ashes Road between A449 and Claygates Road	100 (0.4)	106 (2.2)	112 (2.8)
A449 between Station Drive and Brewood Road (northbound)	1,187 (9.6)	1,188 (7.5)	1,885 (13)
A449 between Station Drive and Brewood Road (southbound)	1,883 (13.1)	2,277 (9.5)	2,970 (19.3)
Old Stafford Road between A449 and New Road	136 (3.8)	140 (3.8)	140 (3.8)

Road	2016 baseline	2021 No development	2021 With development
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	150 (0.5)	154 (0.5)	154 (0.5)
Poplars Farm Way between A449 and Lawn Lane	512 (0.3)	472 (1.3)	553 (1)
Lawn Lane between Brewood Road and Wobaston Road	258 (0.9)	266 (0.9)	266 (0.9)
A449 Stafford Road M54 J2 to Brewood Road (northbound)	1,170 (35.3)	1,427 (7.5)	2,062 (12.7)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	1,148 (24.1)	1,453 (5.8)	2,016 (14.5)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	2,042 (17.9)	2,407 (4.4)	2,877 (7.8)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	1,709 (15.9)	2,087 (4)	2,419 (8.4)
Wobaston Road between Stafford Road and The Droveway	1,843 (8.9)	2,398 (2.4)	2,420 (2.4)
A449 Stafford Road between Wobaston Road and A460	2,997 (17.6)	3,889 (3.4)	4,600 (7.8)
Church Road between A449 Stafford Road and Three Tuns Lane	45 (0)	47 (0)	47 (0)
Bargate Street, Brewood	72 (0.6)	74 (0.6)	74 (0.6)
Sandy Lane / The Pavement, Brewood	123 (0.5)	127 (0.5)	127 (0.5)
Coven Road, Brewood between The Pavement and Tinkers Lane	182 (0.4)	187 (0.4)	187 (0.4)
B5012 Wolgarston Way between Cannock Road and A449	482 (1.8)	1,077 (5.8)	1,259 (5.9)
A449 between B5012 Boscomoor Lane and Pinfold Lane	1,358 (10.7)	640 (11.8)	869 (16)
A449 between B5012 Boscomoor Lane and A5	1,601 (6.3)	1,819 (9.9)	2,226 (14.7)
Camp Road between Penkridge Bank Road and A34	298 (0.1)	306 (0.1)	306 (0.1)
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	355 (3.2)	365 (3.2)	365 (3.2)
A5 between A4601 Wolverhampton Road and M6 Toll	2,059 (23.2)	1,781 (43.4)	2,192 (39)
A4601 Wolverhampton Road between A5 and M6 Toll	1,718 (5.4)	1,680 (50)	1,729 (49)
A4601 Wolverhampton Road between A5 and Longford Road	1,638 (2.1)	1,735 (14.7)	1,849 (15.1)
Bursnips Road	989 (13.7)	1,041 (13.7)	1,041 (13.7)
M6 between Junction 10 and 10a (northbound)	8,374 (35.6)	9,508 (22.9)	10,049 (24.2)
M6 between Junction 10 and 10a (southbound)	9,603 (31.5)	8,649 (24.9)	9,266 (26.6)
M6 between Junction 12 and 13 (northbound)	7,020 (33.2)	9,520 (32.6)	9,799 (32.4)
M6 between Junction 12 and 13 (southbound)	8,051 (29.3)	11,851 (29.3)	12,242 (28.8)
M6 between Junction 11a and 12 (northbound)	7,799 (38.8)	9,285 (32.9)	10,298 (33.8)
M6 between Junction 11a and 12 (southbound)	8,944 (34.3)	11,150 (29.2)	12,019 (30.7)
M6 between Junction 10a and 11 (northbound)	6,047 (44)	7,820 (43.6)	8,393 (43.5)
M6 between Junction 10a and 11 (southbound)	6,934 (38.9)	8,450 (38.5)	9,090 (39.3)
A5 between A34 and B4154	2,943 (21.5)	4,610 (26.4)	4,719 (26.1)
Notes: All roads are two-way, unless stated otherwise. Data presented in the form of 8 hour AAWT flows with the percentage of HGVs in brackets			

Table A13.5.4: Off-site night-time road traffic flows – 2036

Road	2016 baseline	2036 No development	2036 With development
M6 between Junction 13 and 14 (northbound)	8,246 (48.1)	11,441 (37.8)	11,609 (37.8)
M6 between Junction 13 and 14 (southbound)	9,456 (42.5)	13,833 (30)	14,074 (30.2)
A449 between M6 J13 and Pinfold Lane	1,051 (8)	1,402 (18.2)	1,646 (20.1)
Teddesley Road between Marsh Lane and Penkridge Road	176 (0.5)	197 (0.5)	197 (0.5)
Cannock Road between Wolgarston Way and A34	649 (1.5)	1,023 (7.7)	1,182 (9.3)
A5 between M6 Junction 12 and Proposed Site Access	1,482 (67.1)	3,715 (15.4)	5,770 (29.7)
A5 between Vicarage Road and M6 J12	3,678 (41)	4,241 (28.9)	5,352 (30.6)
M6 between Junction 9 and 10 (northbound)	11,069 (37.3)	16,306 (26.2)	16,698 (26.8)
M6 between Junction 9 and 10 (southbound)	14,221 (28.9)	23,028 (23.4)	23,517 (24.3)
A5 between Vicarage Road and A4061 Wolverhampton Road	2,240 (38)	2,739 (31.9)	3,526 (29.7)
A5 between A449 and Proposed Site Access	3,896 (42.3)	4,508 (19.3)	4,602 (25)
A5 between A449 and A41	1,104 (8.9)	1,604 (11.7)	1,913 (15.8)
A5 between A41 and A4640 Redhill Way	624 (8.5)	926 (20)	1,017 (24.3)
A449 between A5 and Gravelly Way (northbound)	398 (16.2)	1,859 (11.3)	2,059 (18.6)
A449 between A5 and Gravelly Way (southbound)	326 (20.1)	1,144 (6)	1,328 (16.3)
A449 between Gravelly Way and Station Drive (northbound)	839 (16.7)	996 (6.2)	1,840 (12.8)
A449 between Gravelly Way and Station Drive (southbound)	1,201 (24.7)	1,649 (8.6)	2,283 (23.2)
Vicarage Road between Site Access and A5	541 (14.9)	587 (16.2)	1,672 (29.6)
Straight Mile between Vicarage Road and Oak Lane	88 (0.9)	101 (2)	106 (2.5)
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	629 (11.8)	535 (16.5)	759 (18.8)
Station Drive between A449 and Enterprise Drive	735 (5.6)	859 (14.3)	1,047 (16)
Four Ashes Road between A449 and Claygates Road	100 (0.4)	115 (2.2)	122 (2.8)
A449 between Station Drive and Brewood Road (northbound)	1,187 (9.6)	1,297 (7.5)	1,997 (13)
A449 between Station Drive and Brewood Road (southbound)	1,883 (13.1)	2,486 (9.5)	3,186 (19.1)
Old Stafford Road between A449 and New Road	136 (3.8)	152 (3.8)	152 (3.8)
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	150 (0.5)	168 (0.5)	168 (0.5)
Poplars Farm Way between A449 and Lawn Lane	512 (0.3)	514 (1.2)	595 (1.1)
Lawn Lane between Brewood Road and Wobaston Road	258 (0.9)	289 (0.9)	289 (0.9)
A449 Stafford Road M54 J2 to Brewood Road (northbound)	1,170 (35.3)	1,558 (7.5)	2,196 (12.7)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	1,148 (24.1)	1,586 (5.8)	2,151 (14.1)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	2,042 (17.9)	2,624 (4.4)	3,101 (7.7)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	1,709 (15.9)	2,276 (4)	2,611 (8.2)
Wobaston Road between Stafford Road and The Droveway	1,843 (8.9)	2,648 (2.4)	2,673 (2.4)
A449 Stafford Road between Wobaston Road and A460	2,997 (17.6)	4,257 (3.4)	4,973 (7.6)
Church Road between A449 Stafford Road and Three Tuns Lane	45 (0)	51 (0)	51 (0)
Bargate Street, Brewood	72 (0.6)	82 (0.6)	82 (0.6)

Road	2016 baseline	2036 No development	2036 With development
Sandy Lane / The Pavement, Brewood	123 (0.5)	140 (0.5)	140 (0.5)
Coven Road, Brewood between The Pavement and Tinkers Lane	182 (0.4)	207 (0.4)	207 (0.4)
B5012 Wolgarston Way between Cannock Road and A449	482 (1.8)	1,189 (5.8)	1,374 (5.8)
A449 between B5012 Boscomoor Lane and Pinfold Lane	1,358 (10.7)	700 (11.8)	927 (15.5)
A449 between B5012 Boscomoor Lane and A5	1,601 (6.3)	1,969 (9.9)	2,378 (14.5)
Camp Road between Penkridge Bank Road and A34	298 (0.1)	333 (0.1)	333 (0.1)
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	355 (3.2)	397 (3.2)	397 (3.2)
A5 between A4601 Wolverhampton Road and M6 Toll	2,059 (23.2)	1,942 (43.4)	2,345 (39.4)
A4601 Wolverhampton Road between A5 and M6 Toll	1,718 (5.4)	1,838 (50)	1,887 (49.1)
A4601 Wolverhampton Road between A5 and Longford Road	1,638 (2.1)	1,899 (14.7)	2,010 (15.1)
Bursnips Road	989 (13.7)	1,127 (13.7)	1,127 (13.7)
M6 between Junction 10 and 10a (northbound)	8,374 (35.6)	10,674 (22.9)	11,211 (24)
M6 between Junction 10 and 10a (southbound)	9,603 (31.5)	9,710 (24.9)	10,326 (26.4)
M6 between Junction 12 and 13 (northbound)	7,020 (33.2)	10,687 (32.6)	10,978 (32.4)
M6 between Junction 12 and 13 (southbound)	8,051 (29.3)	13,304 (29.3)	13,715 (28.9)
M6 between Junction 11a and 12 (northbound)	7,799 (38.8)	10,424 (32.9)	11,448 (33.7)
M6 between Junction 11a and 12 (southbound)	8,944 (34.3)	12,517 (29.2)	13,406 (30.5)
M6 between Junction 10a and 11 (northbound)	6,047 (44)	8,779 (43.6)	9,351 (43.5)
M6 between Junction 10a and 11 (southbound)	6,934 (38.9)	9,486 (38.5)	10,128 (39.2)
A5 between A34 and B4154	2,943 (21.5)	5,034 (26.4)	5,131 (26.1)

Notes:
All roads are two-way, unless stated otherwise.
Data presented in the form of 8 hour AAWT flows with the percentage of HGVs in brackets

Table 13.5.5: Calculated changes in daytime road traffic noise, 2021, free-field $L_{A10,18hrs}$ dB

Location	2016 baseline	2021 No development[1]	2021 With development[2]
M6 between Junction 13 and 14 (northbound)	82.6	83.0 (+0.4)	83.0 (0)
M6 between Junction 13 and 14 (southbound)	82.6	83.1 (+0.5)	83.1 (0)
A449 between M6 J13 and Pinfold Lane	72.5	74.2 (+1.7)	74.8 (+0.6)
Teddesley Road between Marsh Lane and Penkridge Road	65.1	65.3 (+0.2)	65.3 (0)
Cannock Road between Wolgarston Way and A34	68.6	71.5 (+2.9)	71.9 (+0.4)
A5 between M6 Junction 12 and Proposed Site Access	73.5	72.8 (-0.7)	75.9 (+3.1)
A5 between Vicarage Road and M6 J12	74.4	73.7 (-0.7)	75.0 (+1.3)
M6 between Junction 9 and 10 (northbound)	83.8	84.6 (+0.8)	84.7 (+0.1)
M6 between Junction 9 and 10 (southbound)	83.0	83.9 (+0.9)	84.1 (+0.2)
A5 between Vicarage Road and A4061 Wolverhampton Road	73.9	73.9 (0)	74.6 (+0.7)
A5 between A449 and Proposed Site Access	73.8	72.7 (-1.1)	73.4 (+0.7)
A5 between A449 and A41	72.2	73.8 (+1.6)	74.4 (+0.6)
A5 between A41 and A4640 Redhill Way	70.0	72.5 (+2.5)	72.7 (+0.2)
A449 between A5 and Gravelly Way (northbound)	73.6	72.9 (-0.7)	73.8 (+0.9)
A449 between A5 and Gravelly Way (southbound)	73.7	72.5 (-1.2)	73.2 (+0.7)
A449 between Gravelly Way and Station Drive (northbound)	72.8	72.3 (-0.5)	74.6 (+2.3)
A449 between Gravelly Way and Station Drive (southbound)	72.8	72.8 (0)	74.9 (+2.1)
Vicarage Road between Site Access and A5	67.5	67.6 (+0.1)	70.9 (+3.3)
Straight Mile between Vicarage Road and Oak Lane	61.5	62.0 (+0.5)	62.1 (+0.1)
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	68.1	67.5 (-0.6)	67.5 (0)
Station Drive between A449 and Enterprise Drive	66.1	67.6 (+1.5)	67.5 (-0.1)
Four Ashes Road between A449 and Claygates Road	62.5	63.4 (+0.9)	63.9 (+0.5)
A449 between Station Drive and Brewood Road (northbound)	73.7	74.1 (+0.4)	75.4 (+1.3)
A449 between Station Drive and Brewood Road (southbound)	74.1	74.1 (0)	75.7 (+1.6)
Old Stafford Road between A449 and New Road	64.1	64.3 (+0.2)	64.3 (0)
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	61.1	61.3 (+0.2)	61.3 (0)
Poplars Farm Way between A449 and Lawn Lane	65.1	65.6 (+0.5)	65.6 (0)
Lawn Lane between Brewood Road and Wobaston Road	66.9	67.0 (+0.1)	67.0 (0)
A449 Stafford Road M54 J2 to Brewood Road (northbound)	74.8	73.6 (-1.2)	74.9 (+1.3)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	74.7	73.8 (-0.9)	75.2 (+1.4)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	71.8	70.2 (-1.6)	71.2 (+1.0)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	72.3	70.9 (-1.4)	71.8 (+0.9)
Wobaston Road between Stafford Road and The Droveway	70.7	70.4 (-0.3)	70.5 (+0.1)
A449 Stafford Road between Wobaston Road and A460	74.4	73.1 (-1.3)	74.1 (+1.0)
Church Road between A449 Stafford Road and Three Tuns Lane	Unreliable	54.5	54.5 (0)

Location	2016 baseline	2021 No development[1]	2021 With development[2]
Bargate Street, Brewood	59.9	60.1 (+0.2)	60.1 (0)
Sandy Lane / The Pavement, Brewood	60.7	60.9 (+0.2)	60.9 (0)
Coven Road, Brewood between The Pavement and Tinkers Lane	62.6	62.8 (+0.2)	62.8 (0)
B5012 Wolgarston Way between Cannock Road and A449	65.6	66.4 (+0.8)	66.7 (+0.3)
A449 between B5012 Boscomoor Lane and Pinfold Lane	69.3	69.7 (+0.4)	70.0 (+0.3)
A449 between B5012 Boscomoor Lane and A5	69.5	70.5 (+1.0)	71.4 (+0.9)
Camp Road between Penkridge Bank Road and A34	65.7	65.9 (+0.2)	65.9 (0)
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	67.5	67.7 (+0.2)	67.7 (0)
A5 between A4601 Wolverhampton Road and M6 Toll	72.7	75 (+2.3)	75.2 (+0.2)
A4601 Wolverhampton Road between A5 and M6 Toll	68.5	72.0 (+3.5)	72.0 (0)
A4601 Wolverhampton Road between A5 and Longford Road	67.9	69.9 (+2.0)	70.1 (+0.2)
Bursnips Road	71.1	71.4 (+.3)	71.4 (0)
M6 between Junction 10 and 10a (northbound)	82.0	84.1 (+2.1)	84.2 (+0.1)
M6 between Junction 10 and 10a (southbound)	82.1	84 (+1.9)	84.1 (+0.1)
M6 between Junction 12 and 13 (northbound)	81.1	82.4 (+1.3)	82.5 (+0.1)
M6 between Junction 12 and 13 (southbound)	81.2	82.8 (+1.6)	82.9 (+0.1)
M6 between Junction 11a and 12 (northbound)	81.9	82.3 (+0.4)	82.7 (+0.4)
M6 between Junction 11a and 12 (southbound)	81.9	82.6 (+0.7)	82.9 (+0.3)
M6 between Junction 10a and 11 (northbound)	81.0	82.1 (+1.1)	82.3 (+0.2)
M6 between Junction 10a and 11 (southbound)	81.1	81.9 (+0.8)	82.2 (+0.3)
A5 between A34 and B4154	74.7	75.1 (+0.4)	75.1 (0)

Notes:
[1] the bracketed value is the change in noise level between the 2016 baseline and 2021 No Development scenario
[2] the bracketed value is the change in noise level between the 2021 No Development scenario and the 2021 With Development scenario
[3] Traffic flow below validity of CRTN

Table 13.5.6: Calculated changes in daytime road traffic noise, 2036, free-field $L_{A10,18hrs}$ dB

Location	2016 baseline	2036 No development[1]	2036 With development[2]
M6 between Junction 13 and 14 (northbound)	82.6	83.5 (+0.9)	83.5 (0)
M6 between Junction 13 and 14 (southbound)	82.6	83.6 (+1.0)	83.6 (0)
A449 between M6 J13 and Pinfold Lane	72.5	74.5 (+2)	75.1 (+0.6)
Teddesley Road between Marsh Lane and Penkridge Road	65.1	65.7 (+0.6)	65.7 (0)
Cannock Road between Wolgarston Way and A34	68.6	71.9 (+3.3)	72.3 (+0.4)
A5 between M6 Junction 12 and Proposed Site Access	73.5	73.1 (-0.4)	76.1 (+3.0)
A5 between Vicarage Road and M6 J12	74.4	74.1 (-0.3)	75.3 (+1.2)
M6 between Junction 9 and 10 (northbound)	83.8	85.1 (+1.3)	85.2 (+0.1)
M6 between Junction 9 and 10 (southbound)	83.0	84.4 (+1.4)	84.6 (+0.2)
A5 between Vicarage Road and A4061 Wolverhampton Road	73.9	74.2 (+0.3)	74.9 (+0.7)
A5 between A449 and Proposed Site Access	73.8	73.1 (-0.7)	73.7 (+0.6)

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Location	2016 baseline	2036 No development[1]	2036 With development[2]
A5 between A449 and A41	72.2	74.1 (+1.9)	74.7 (+0.6)
A5 between A41 and A4640 Redhill Way	70.0	72.8 (+2.8)	73.1 (+0.3)
A449 between A5 and Gravelly Way (northbound)	73.6	73.3 (-0.3)	74.2 (+0.9)
A449 between A5 and Gravelly Way (southbound)	73.7	72.9 (-0.8)	73.5 (+0.6)
A449 between Gravelly Way and Station Drive (northbound)	72.8	72.6 (-0.2)	74.9 (+2.3)
A449 between Gravelly Way and Station Drive (southbound)	72.8	73.2 (+0.4)	75.2 (+2.0)
Vicarage Road between Site Access and A5	67.5	68.0 (+0.5)	71.1 (+3.1)
Straight Mile between Vicarage Road and Oak Lane	61.5	62.5 (+1.0)	62.6 (+0.1)
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	68.1	67.9 (-0.2)	67.7 (-0.2)
Station Drive between A449 and Enterprise Drive	66.1	68.0 (+1.9)	67.8 (-0.2)
Four Ashes Road between A449 and Claygates Road	62.5	63.8 (+1.3)	64.3 (+0.5)
A449 between Station Drive and Brewood Road (northbound)	73.7	74.5 (+0.8)	75.7 (+1.2)
A449 between Station Drive and Brewood Road (southbound)	74.1	74.5 (+0.4)	76.0 (+1.5)
Old Stafford Road between A449 and New Road	64.1	64.7 (+0.6)	64.7 (0)
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	61.1	61.7 (+0.6)	61.7 (0)
Poplars Farm Way between A449 and Lawn Lane	65.1	65.9 (+0.8)	66 (+0.1)
Lawn Lane between Brewood Road and Wobaston Road	66.9	67.4 (+0.5)	67.4 (0)
A449 Stafford Road M54 J2 to Brewood Road (northbound)	74.8	74.0 (-0.8)	75.2 (+1.2)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	74.7	74.2 (-0.5)	75.5 (+1.3)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	71.8	70.6 (-1.2)	71.5 (+0.9)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	72.3	71.3 (-1.0)	72.2 (+0.9)
Wobaston Road between Stafford Road and The Droveway	70.7	70.9 (+0.2)	70.9 (0)
A449 Stafford Road between Wobaston Road and A460	74.4	73.5 (-0.9)	74.5 (+1.0)
Church Road between A449 Stafford Road and Three Tuns Lane	Unreliable	55.2	55.2 (0)
Bargate Street, Brewood	59.9	60.6 (+0.7)	60.6 (0)
Sandy Lane / The Pavement, Brewood	60.7	61.3 (+0.6)	61.3 (0)
Coven Road, Brewood between The Pavement and Tinkers Lane	62.6	63.2 (+0.6)	63.2 (0)
B5012 Wolgarston Way between Cannock Road and A449	65.6	66.9 (+1.3)	67.1 (+0.2)
A449 between B5012 Boscomoor Lane and Pinfold Lane	69.3	70.1 (+0.8)	70.3 (+0.2)
A449 between B5012 Boscomoor Lane and A5	69.5	70.8 (+1.3)	71.7 (+0.9)
Camp Road between Penkridge Bank Road and A34	65.7	66.2 (+0.5)	66.2 (0)
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	67.5	68.1 (+0.6)	68.1 (0)
A5 between A4601 Wolverhampton Road and M6 Toll	72.7	75.4 (+2.7)	75.5 (+0.1)
A4601 Wolverhampton Road between A5 and M6 Toll	68.5	72.4 (+3.9)	72.4 (0)
A4601 Wolverhampton Road between A5 and Longford Road	67.9	70.3 (+2.4)	70.5 (+0.2)

Location	2016 baseline	2036 No development[1]	2036 With development[2]
Bursnips Road	71.1	71.7 (+0.6)	71.7 (0)
M6 between Junction 10 and 10a (northbound)	82.0	84.6 (+2.6)	84.7 (+0.1)
M6 between Junction 10 and 10a (southbound)	82.1	84.5 (+2.4)	84.6 (+0.1)
M6 between Junction 12 and 13 (northbound)	81.1	82.9 (+1.8)	83.0 (+0.1)
M6 between Junction 12 and 13 (southbound)	81.2	83.3 (+2.1)	83.4 (+0.1)
M6 between Junction 11a and 12 (northbound)	81.9	82.8 (+0.9)	83.2 (+0.4)
M6 between Junction 11a and 12 (southbound)	81.9	83.1 (+1.2)	83.4 (+0.3)
M6 between Junction 10a and 11 (northbound)	81.0	82.6 (+1.6)	82.8 (+0.2)
M6 between Junction 10a and 11 (southbound)	81.1	82.4 (+1.3)	82.7 (+0.3)
A5 between A34 and B4154	74.7	75.5 (+0.8)	75.5 (0)
Notes: [1] the bracketed value is the change in noise level between the 2016 baseline and 2021 No Development scenario [2] the bracketed value is the change in noise level between the 2021 No Development scenario and the 2021 With Development scenario [3] Traffic flow below validity of CRTN			

Table 13.5.7: Calculated changes in night-time road traffic noise, 2021, free-field $L_{A10,8hrs}$ dB

Location	2016 baseline	2021 No development[1]	2021 With development[2]
M6 between Junction 13 and 14 (northbound)	80.0	80.2 (+0.2)	80.3 (+0.1)
M6 between Junction 13 and 14 (southbound)	80.2	80.4 (+0.2)	80.5 (+0.1)
A449 between M6 J13 and Pinfold Lane	66.2	68.7 (+2.5)	69.7 (+1.0)
Teddesley Road between Marsh Lane and Penkridge Road	Unreliable	Unreliable	Unreliable
Cannock Road between Wolgarston Way and A34	59.3	63 (+3.7)	64.1 (+1.1)
A5 between M6 Junction 12 and Proposed Site Access	71.0	70.2 (-0.8)	74.0 (+3.8)
A5 between Vicarage Road and M6 J12	73.2	72.4 (-0.8)	73.6 (+1.2)
M6 between Junction 9 and 10 (northbound)	80.5	80.7 (+0.2)	80.9 (+0.2)
M6 between Junction 9 and 10 (southbound)	80.9	82.0 (+1.1)	82.2 (+0.2)
A5 between Vicarage Road and A4061 Wolverhampton Road	70.8	70.8 (0)	71.7 (+0.9)
A5 between A449 and Proposed Site Access	73.6	71.6 (-2)	72.4 (+0.8)
A5 between A449 and A41	66.0	67.9 (+1.9)	69.3 (+1.4)
A5 between A41 and A4640 Redhill Way	62.6	66.2 (+3.6)	67.3 (+1.1)
A449 between A5 and Gravelly Way (northbound)	Unreliable	69.7	71.2 (+1.5)
A449 between A5 and Gravelly Way (southbound)	Unreliable	66.6	69.0 (+2.4)
A449 between Gravelly Way and Station Drive (northbound)	66.9	65.9 (-1.0)	70.0 (+4.1)
A449 between Gravelly Way and Station Drive (southbound)	69.7	68.8 (-0.9)	72.1 (+3.3)
Vicarage Road between Site Access and A5	60.8	61 (+0.2)	68.8 (+7.8)
Straight Mile between Vicarage Road and Oak Lane	Unreliable	Unreliable	Unreliable
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	61.3	60.4 (-0.9)	63.3 (+2.9)
Station Drive between A449 and Enterprise Drive	59.3	61.7 (+2.4)	63.3 (+1.6)
Four Ashes Road between A449 and Claygates Road	Unreliable	Unreliable	Unreliable

Location	2016 baseline	2021 No development[1]	2021 With development[2]
A449 between Station Drive and Brewood Road (northbound)	67.8	67.5 (-0.3)	70.4 (+2.9)
A449 between Station Drive and Brewood Road (southbound)	70.4	70.7 (+0.3)	73.1 (+2.4)
Old Stafford Road between A449 and New Road	Unreliable	Unreliable	Unreliable
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	Unreliable	Unreliable	Unreliable
Poplars Farm Way between A449 and Lawn Lane	55.2	55.0 (-0.2)	56.0 (+1.0)
Lawn Lane between Brewood Road and Wobaston Road	Unreliable	Unreliable	Unreliable
A449 Stafford Road M54 J2 to Brewood Road (northbound)	70.5	68.4 (-2.1)	70.7 (+2.3)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	69.4	68.2 (-1.2)	70.9 (+2.7)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	67.6	65.7 (-1.9)	67.3 (+1.6)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	66.5	65.0 (-1.5)	66.7 (+1.7)
Wobaston Road between Stafford Road and The Droveway	64.8	64.1 (-0.7)	64.1 (0)
A449 Stafford Road between Wobaston Road and A460	69.2	67.5 (-1.7)	69.3 (+1.8)
Church Road between A449 Stafford Road and Three Tuns Lane	Unreliable	Unreliable	Unreliable
Bargate Street, Brewood	Unreliable	Unreliable	Unreliable
Sandy Lane / The Pavement, Brewood	Unreliable	Unreliable	Unreliable
Coven Road, Brewood between The Pavement and Tinkers Lane	Unreliable	Unreliable	Unreliable
B5012 Wolgarston Way between Cannock Road and A449	55.4	61.5 (+6.1)	62.3 (+0.8)
A449 between B5012 Boscomoor Lane and Pinfold Lane	63.8	59.9 (-3.9)	62.5 (+2.6)
A449 between B5012 Boscomoor Lane and A5	63.5	64.9 (+1.4)	66.8 (+1.9)
Camp Road between Penkridge Bank Road and A34	Unreliable	Unreliable	Unreliable
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	Unreliable	Unreliable	Unreliable
A5 between A4601 Wolverhampton Road and M6 Toll	69	70.3 (+1.3)	70.8 (+0.5)
A4601 Wolverhampton Road between A5 and M6 Toll	63.6	69.4 (+5.8)	69.5 (+0.1)
A4601 Wolverhampton Road between A5 and Longford Road	62.4	65.7 (+3.3)	66.0 (+0.3)
Bursnips Road	66.2	66.5 (+0.3)	66.5 (0)
M6 between Junction 10 and 10a (northbound)	79.2	78.6 (-0.6)	78.9 (+0.3)
M6 between Junction 10 and 10a (southbound)	79.4	78.4 (-1)	78.8 (+0.4)
M6 between Junction 12 and 13 (northbound)	78.2	79.5 (+1.3)	79.6 (+0.1)
M6 between Junction 12 and 13 (southbound)	78.5	80.1 (+1.6)	80.2 (+0.1)
M6 between Junction 11a and 12 (northbound)	79.1	79.4 (+0.3)	79.9 (+0.5)
M6 between Junction 11a and 12 (southbound)	79.3	79.9 (+0.6)	80.3 (+0.4)
M6 between Junction 10a and 11 (northbound)	78.4	79.5 (+1.1)	79.8 (+0.3)
M6 between Junction 10a and 11 (southbound)	78.6	79.4 (+0.8)	79.8 (+0.4)
A5 between A34 and B4154	70.4	72.9 (+2.5)	72.9 (0)

Notes:
[1] the bracketed value is the change in noise level between the 2016 baseline and 2021 No Development scenario
[2] the bracketed value is the change in noise level between the 2021 No Development scenario and the 2021 With Development scenario

Location	2016 baseline	2021 No development[1]	2021 With development[2]
[3] Traffic flow below validity of CRTN			

Table 13.5.8: Calculated changes in night-time road traffic noise, 2036, free-field $L_{A10,8hrs}$ dB

Location	2016 baseline	2036 No development[1]	2036 With development[2]
M6 between Junction 13 and 14 (northbound)	80.0	80.7 (+0.7)	80.8 (+0.1)
M6 between Junction 13 and 14 (southbound)	80.2	80.9 (+0.7)	81.0 (+0.1)
A449 between M6 J13 and Pinfold Lane	66.2	69.1 (+2.9)	70.0 (+0.9)
Teddesley Road between Marsh Lane and Penkridge Road	Unreliable	Unreliable	Unreliable
Cannock Road between Wolgarston Way and A34	59.3	63.4 (+4.1)	64.5 (+1.1)
A5 between M6 Junction 12 and Proposed Site Access	71.0	70.6 (-0.4)	74.2 (+3.6)
A5 between Vicarage Road and M6 J12	73.2	72.8 (-0.4)	74.0 (+1.2)
M6 between Junction 9 and 10 (northbound)	80.5	81.2 (+0.7)	81.4 (+0.2)
M6 between Junction 9 and 10 (southbound)	80.9	82.5 (+1.6)	82.6 (+0.1)
A5 between Vicarage Road and A4061 Wolverhampton Road	70.8	71.2 (+0.4)	72.1 (+0.9)
A5 between A449 and Proposed Site Access	73.6	71.9 (-1.7)	72.7 (+0.8)
A5 between A449 and A41	66.0	68.2 (+2.2)	69.6 (+1.4)
A5 between A41 and A4640 Redhill Way	62.6	66.6 (+4)	67.6 (+1.0)
A449 between A5 and Gravelly Way (northbound)	Unreliable	70.1	71.5 (+1.4)
A449 between A5 and Gravelly Way (southbound)	Unreliable	67.0	69.3 (+2.3)
A449 between Gravelly Way and Station Drive (northbound)	66.9	66.3 (-0.6)	70.3 (+4.0)
A449 between Gravelly Way and Station Drive (southbound)	69.7	69.2 (-0.5)	72.4 (+3.2)
Vicarage Road between Site Access and A5	60.8	61.6 (+0.8)	68.8 (+7.2)
Straight Mile between Vicarage Road and Oak Lane	Unreliable	Unreliable	Unreliable
Station Road / Vicarage Road between Enterprise Drive and Proposed Site Access	61.3	61.0 (-0.3)	63.5 (+2.5)
Station Drive between A449 and Enterprise Drive	59.3	62.2 (+2.9)	63.5 (+1.3)
Four Ashes Road between A449 and Claygates Road	Unreliable	Unreliable	Unreliable
A449 between Station Drive and Brewood Road (northbound)	67.8	67.9 (+0.1)	70.6 (+2.7)
A449 between Station Drive and Brewood Road (southbound)	70.4	71.1 (+0.7)	73.4 (+2.3)
Old Stafford Road between A449 and New Road	Unreliable	Unreliable	Unreliable
Coven Road / Brewood Road / Poplars Farm Way between Lawn Lane and Tinkers lane	Unreliable	Unreliable	Unreliable
Poplars Farm Way between A449 and Lawn Lane	55.2	55.6 (+0.4)	56.5 (+0.9)
Lawn Lane between Brewood Road and Wobaston Road	Unreliable	Unreliable	Unreliable
A449 Stafford Road M54 J2 to Brewood Road (northbound)	70.5	68.7 (-1.8)	71.0 (+2.3)
A449 Stafford Road M54 J2 to Brewood Road (southbound)	69.4	68.5 (-0.9)	71.1 (+2.6)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (northbound)	67.6	66.1 (-1.5)	67.6 (+1.5)
A449 Stafford Road M54 J2 to Station Road/ Wobaston Road junction (southbound)	66.5	65.3 (-1.2)	66.9 (+1.6)

Location	2016 baseline	2036 No development[1]	2036 With development[2]
Wobaston Road between Stafford Road and The Droveway	64.8	64.5 (-0.3)	64.6 (+0.1)
A449 Stafford Road between Wobaston Road and A460	69.2	67.9 (-1.3)	69.6 (+1.7)
Church Road between A449 Stafford Road and Three Tuns Lane	Unreliable	Unreliable	Unreliable
Bargate Street, Brewood	Unreliable	Unreliable	Unreliable
Sandy Lane / The Pavement, Brewood	Unreliable	Unreliable	Unreliable
Coven Road, Brewood between The Pavement and Tinkers Lane	Unreliable	Unreliable	Unreliable
B5012 Wolgarston Way between Cannock Road and A449	55.4	62 (+6.6)	62.7 (+0.7)
A449 between B5012 Boscomoor Lane and Pinfold Lane	63.8	60.5 (-3.3)	62.8 (+2.3)
A449 between B5012 Boscomoor Lane and A5	63.5	65.3 (+1.8)	67.0 (+1.7)
Camp Road between Penkridge Bank Road and A34	Unreliable	Unreliable	Unreliable
Penkridge Bank Road between Broadhurst Green Road and Marquis Drive	Unreliable	Unreliable	Unreliable
A5 between A4601 Wolverhampton Road and M6 Toll	69.0	70.6 (+1.6)	71.1 (+0.5)
A4601 Wolverhampton Road between A5 and M6 Toll	63.6	69.8 (+6.2)	69.8 (0)
A4601 Wolverhampton Road between A5 and Longford Road	62.4	66.1 (+3.7)	66.4 (+0.3)
Bursnips Road	66.2	66.9 (+0.7)	66.9 (0)
M6 between Junction 10 and 10a (northbound)	79.2	79.1 (-0.1)	79.4 (+0.3)
M6 between Junction 10 and 10a (southbound)	79.4	78.9 (-0.5)	79.3 (+0.4)
M6 between Junction 12 and 13 (northbound)	78.2	80 (+1.8)	80.1 (+0.1)
M6 between Junction 12 and 13 (southbound)	78.5	80.6 (+2.1)	80.7 (+0.1)
M6 between Junction 11a and 12 (northbound)	79.1	79.9 (+0.8)	80.4 (+0.5)
M6 between Junction 11a and 12 (southbound)	79.3	80.4 (+1.1)	80.8 (+0.4)
M6 between Junction 10a and 11 (northbound)	78.4	80.0 (+1.6)	80.2 (+0.2)
M6 between Junction 10a and 11 (southbound)	78.6	79.9 (+1.3)	80.3 (+0.4)
A5 between A34 and B4154	70.4	73.3 (+2.9)	73.3 (0)

Notes:
[1] the bracketed value is the change in noise level between the 2016 baseline and 2021 No Development scenario
[2] the bracketed value is the change in noise level between the 2021 No Development scenario and the 2021 With Development scenario
[3] Traffic flow below validity of CRTN

Table A13.5.9: Noise Insulation Regulations Assessment – Road

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Roads	Contribution from Unaltered Roads	>68dB?	>1dB Change?	>1dB Contribution?	Qualify?
1	1 Croft Lane	50.8	51.7	50.3	46.1	No	No	YES	
2	2 Croft Lane	50.4	51.6	50.3	45.7	No	YES	YES	
3	3 Croft Lane	50.3	51.6	50.4	45.4	No	YES	YES	
4	4 Croft Lane	50.7	51.8	50.7	45.3	No	YES	YES	
5	5 Croft Lane	49.7	50.5	49.6	43.2	No	No	YES	
6	180 Station Drive	67.7	69.4	49.4	69.4	YES	YES	No	
7	181 Station Drive	73.6	75.4	36.7	75.4	YES	YES	No	
8	182 Station Drive	68.2	69.7	31.9	69.7	YES	YES	No	
9	183 Station Drive	68.1	69.6	31.8	69.6	YES	YES	No	
10	219 Gatesford Lane	56.7	58.6	55.6	55.6	No	YES	YES	
11	221 Gatesford Lane	57.6	59.3	56.3	56.3	No	YES	YES	
12	221a Gatesford Lane	57.6	58.9	56.3	55.4	No	YES	YES	
13	221b Gatesford Lane	55.4	56.6	52.7	54.3	No	YES	YES	
14	221c Gatesford Lane	54.3	55.8	52.4	53.1	No	YES	YES	
15	221d Gatesford Lane	55.0	56.3	52.7	53.8	No	YES	YES	
16	221e Gatesford Lane	54.3	55.4	51.7	53.0	No	YES	YES	
17	221f Gatesford Lane	55.5	56.7	53.8	53.6	No	YES	YES	
18	221g Gatesford Lane	56.3	58.1	55.3	54.9	No	YES	YES	
19	221h Gatesford Lane	59.6	61.1	58.4	57.8	No	YES	YES	
20	221i Gatesford Lane	57.8	59.2	56.6	55.7	No	YES	YES	
21	Allendalle	54.4	53.6	50.3	50.9	No	No	YES	
22	Anberlea	67.1	68.5	38.6	68.5	YES	YES	No	
23	Angalla	53.8	53.0	50.6	49.3	No	No	YES	
24	Avenue Cottages	63.5	66.2	56.0	65.8	No	YES	No	

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Roads	Contribution from Unaltered Roads	>68dB?	>1dB Change?	>1dB Contribution?	Qualify?
25	Comox	54.3	57.5	55.5	53.2	No	YES	YES	
26	Eastfield	67.6	70.4	55.9	70.2	YES	YES	No	
27	Edelweiss	67.2	68.6	38.6	68.6	YES	YES	No	
28	Evergreen	71.3	71.8	62.8	71.2	YES	No	No	
29	Gailey House	52.3	52.7	48.1	50.9	No	No	YES	
30	Goldthorne	67.2	68.7	30.6	68.7	YES	YES	No	
31	Hamerton House	75.7	75.6	49.2	75.6	YES	No	No	
32	Hollybyre	74.6	75.0	62.6	74.7	YES	No	No	
33	Homestead	71.5	72.3	67.5	70.6	YES	No	YES	
34	Inglewood	74.1	76.0	41.9	76.0	YES	YES	No	
35	Little Kinvaston	68.3	71.0	52.7	70.9	YES	YES	No	
36	Plough Farm	73.7	73.7	60.4	73.5	YES	No	No	
37	Longacre	67.7	70.5	55.5	70.4	YES	YES	No	
38	Marsh Farm	64.3	64.7	59.1	63.3	No	No	YES	
39	Menkani	66.5	68.0	30.7	68.0	YES	YES	No	
40	Oak View	53.1	53.2	51.2	48.9	No	No	YES	
41	Perrinthorpe	55.3	54.7	51.4	52.0	No	No	YES	
42	Pool House	78.0	80.8	55.1	80.8	YES	YES	No	
43	Roma	71.9	71.7	47.3	71.7	YES	No	No	
44	Stafford Road	78.0	78.4	61.5	78.3	YES	No	No	
45	Salwyn Green	52.8	53.4	51.8	48.3	No	No	YES	
46	Silverthorne	67.3	68.8	30.6	68.8	YES	YES	No	
47	Sunnyside	60.5	62.8	60.3	59.2	No	YES	YES	
48	The Bunglalow	51.5	52.2	50.1	48.0	No	No	YES	
49	The Cottage (Croft Lane)	55.9	54.8	52.2	51.3	No	No	YES	

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Roads	Contribution from Unaltered Roads	>68dB?	>1dB Change?	>1dB Contribution?	Qualify?
50	The Poplars	57.0	59.6	53.0	58.5	No	YES	YES	
51	The Poultry Farm House 1	60.3	62.6	58.7	60.3	No	YES	YES	
52	The Poultry Farm House 2	55.7	57.7	57.2	48.1	No	YES	YES	
53	The Villa	72.4	74.8	73.6	68.6	YES	YES	YES	YES
54	The Woodlands	74.1	76.1	34.9	76.1	YES	YES	No	
55	Trewern	72.0	71.9	46.7	71.9	YES	No	No	
56	Wharf Cottage	78.4	78.3	66.1	78.0	YES	No	No	
57	Wharf House	65.6	65.0	55.2	64.5	No	No	No	
58	Wheatcroft	72.0	71.9	46.9	71.9	YES	No	No	
59	Heath Farm	72.1	75.7	63.1	75.5	YES	YES	No	
60	Heath Farm 2	69.4	73.0	39.5	73.0	YES	YES	No	
61	Heath Farm 3	56.5	60.6	39.0	60.6	No	YES	No	
Note: [1] – For receptor locations, see Figure 13.4									

Table A13.5.10: Noise Insulation Regulations Assessment – Railways Daytime

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Railways	Contribution from Unaltered Railways	>68dB?	>1dB Change?	>1dB Contribution?	Qualify?
1	4 Station Drive	59.7	59.9	26.4	59.9	No	No	No	
2	182 Station Drive	52.2	49.9	25.6	49.9	No	No	No	
3	183 Station Drive	50.7	46.4	25.6	46.4	No	No	No	
4	Amadora	63.8	64.1	26.4	64.1	No	No	No	
5	Anberlea	58.8	58.9	25.7	58.9	No	No	No	
6	Chase View (Bungalow)	56.7	57.0	15.1	57.0	No	No	No	
7	Chase View (House)	53.8	54.1	17.4	54.1	No	No	No	

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Railways	Contribution from Unaltered Railways	>68dB?	>1dB Change?	>1dB Contribution?	Qualify?
8	Christchurch Cottage 1	47.8	48.1	14.1	48.1	No	No	No	
9	Christchurch Cottage 2	43.8	44.1	14.8	44.1	No	No	No	
10	Craigmore (Bungalow)	65.4	65.5	20.8	65.5	No	No	No	
11	Denson House	48.6	48.7	25.0	48.7	No	No	No	
12	Dunrobin	69.7	70.0	22.2	70.0	YES	No	No	
13	Edelweiss	59.5	59.7	25.9	59.7	No	No	No	
14	Gailey House	40.1	37.0	24.1	36.8	No	No	No	
15	Goldthorne	56.4	55.9	25.7	55.9	No	No	No	
16	Holy Thorn Cottage	44.0	44.3	17.6	44.3	No	No	No	
17	Leacroft	66.4	66.6	18.2	66.6	No	No	No	
18	Longfield	39.0	38.7	22.4	38.6	No	No	No	
19	Menkani	55.5	54.8	25.8	54.8	No	No	No	
20	Oakleigh	70.5	70.7	13.5	70.7	YES	No	No	
21	Roundabout Cottage	41.8	42.1	20.8	42.1	No	No	No	
22	Scholers Gate	43.0	43.3	17.7	43.3	No	No	No	
23	Silverthorne	56.9	56.7	25.6	56.7	No	No	No	
24	St Clare (Bungalow)	59.6	59.9	24.5	59.9	No	No	No	
25	The Cottage (A5)	47.7	47.9	18.7	47.9	No	No	No	
26	The Elms	62.6	62.9	29.1	62.9	No	No	No	
27	Thurja	40.3	40.2	22.8	40.1	No	No	No	
28	Wheslynn	50	50.2	19.0	50.2	No	No	No	
29	Yonda	39.3	39.0	22.7	38.9	No	No	No	

Note: [1] – For receptor locations, see Figure 13.5

Table A13.5.11: Noise Insulation Regulations Assessment – Railways Night-time

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Railways	Contribution from Unaltered Railways	>63dB?	>1dB Change?	>1dB Contribution ?	Qualify?
1	4 Station Drive	59.1	59.5	27.5	59.5	No	No	No	
2	182 Station Drive	51.7	49.5	26.7	49.5	No	No	No	
3	183 Station Drive	50.1	46	26.7	45.9	No	No	No	
4	Amadora	63.3	63.6	27.5	63.6	YES	No	No	
5	Anberlea	58.3	58.4	26.8	58.4	No	No	No	
6	Chase View (Bungalow)	56.2	56.6	16.2	56.6	No	No	No	
7	Chase View (House)	53.3	53.8	18.5	53.8	No	No	No	
8	Christchurch Cottage 1	47.3	47.7	15.2	47.7	No	No	No	
9	Christchurch Cottage 2	43.3	43.7	15.9	43.7	No	No	No	
10	Craigmore (Bungalow)	64.8	65.1	21.9	65.1	YES	No	No	
11	Denson House	48	48.2	26.1	48.2	No	No	No	
12	Dunrobin	69.2	69.5	23.3	69.5	YES	No	No	
13	Edelweiss	59	59.3	27	59.3	No	No	No	
14	Gailey House	39.5	36.7	25.2	36.4	No	No	No	
15	Goldthorne	55.9	55.5	26.8	55.5	No	No	No	
16	Holy Thorn Cottage	43.5	43.9	18.7	43.9	No	No	No	
17	Leacroft	65.9	66.2	19.3	66.2	YES	No	No	
18	Longfield	38.5	38.3	23.5	38.2	No	No	No	
19	Menkani	55	54.3	26.9	54.3	No	No	No	
20	Oakleigh	69.9	70.3	14.6	70.3	YES	No	No	
21	Roundabout Cottage	41.2	41.8	21.9	41.8	No	No	No	
22	Scholers Gate	42.5	42.9	18.8	42.9	No	No	No	
23	Silverthorne	56.4	56.3	26.7	56.3	No	No	No	
24	St Clare (Bungalow)	59.1	59.4	25.6	59.4	No	No	No	

ID	Receptor[1]	Prevailing Noise Level	Relevant Noise Level	Contribution from New or Altered Railways	Contribution from Unaltered Railways	>63dB?	>1dB Change?	>1dB Contribution ?	Qualify?
25	The Cottage (A5)	47.2	47.5	19.8	47.5	No	No	No	
26	The Elms	62.1	62.5	30.2	62.5	YES	No	No	
27	Thurja	39.8	39.8	23.9	39.7	No	No	No	
28	Wheslynn	49.6	49.9	20.1	49.9	No	No	No	
29	Yonda	38.7	38.6	23.8	38.5	No	No	No	
Note: [1] – For receptor locations, see Figure 13.5									

APPENDIX 3

Emailed Letter Sent to the Rt. Hon. Gavin Williamson CBE MP – 27th July 2020

27th July 2020

Dear Mr Williamson,

I hope you well. I am writing to confirm that I am already in possession of the letter (provided in Appendix 1) which was forwarded to me by your caseworker Elizabeth on 10th July 2020. The letter was written by Highway England's Chief executive, Jim O'Sullivan - dated 9th June 2020.

On 4th May 2020 I sent you a letter (provided in Appendix 2) containing concerns I have about the Development Consent Order (DCO) for the West Midlands Interchange (WMI) at Four Ashes which was granted by the Transport Secretary (TS) earlier on that same day.

In my 4th May letter I asked three questions which sought to clarify the TS's underpinning rationale in relation to the WMI DCO, and its impact upon nuisance noise derived from the A449 between the WMI site and J2 of the M54.

I sent the TS a copy of the same letter and I asked if you could also ask the TS to respond to my three questions. It is my belief that the matters I have raised have the potential to have profound, adverse effects on many hundreds of your constituents, as well as my immediate and extended family who live in two of the three villages which line the A449 between the WMI and Junction 2 (J2) of the M54.

To date, the TS has not responded to me, nor to the best of my knowledge has he responded to yourself in relation to my 4th May 2020 questions. The questions that I posed on 4th May 2020 are very simple; two require yes or no answers and the third requires a single numerical value.

My view on my 4th May 2020 questions is the following:

1. *Should the WMI developer have 'aggregated' their sound data along the A449 to the south of the site in accordance with the Paragraph 13, 26, 27 and 33 requirements of The 'Calculation of Road Traffic Noise' (CRTN) (1988) manual?* - **Yes they should have.**

2. *What levels of change in the acoustic regime along the A449 to the south of the WMI facility would be required before it was deemed harmful to its residents?* - **Any increase of 3dB or more would be 'moderate-adverse' which is significantly adverse for roadside residential receptors[1].**

3. *Would aggregated A449 sound data have generated harmful changes in sound along the A449 that should be mitigated against either by the applicant or Highways England?* - **Yes it would have.**

It would also be highly beneficial if the WMI's ExA Paul Singleton could personally clarify why the specific findings in his recommendation report[2] bear absolutely no relation to the sound aggregation analysis I made in Part 2 of my WMI Deadline 8 submission[3]. My issue is not that Mr Singleton attached greater weight to an element of an agreed concept, or that he attached greater weight to a different

[1] Line 13.344 - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-000326-Doc%206.2%20-%20ES%20Chp%2013%20-%20Noise%20and%20Vib.pdf

[2] Paragraphs 6.4.52, 6.4.53 and 6.4.54 –Page 114 - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-001463-West%20Midlands%20DCO%20Report%20Final.pdf

[3] Pages 3 -7 - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050005/TR050005-001250-Daniel%20Williams%20-%20Resposne%20to%20Deadline%208.pdf

priority. My grievance is that he either ignored or did not understand the basic requirements of the CRTN in the sound assessment which he was obliged to appraise and have **a** regard to in his recommendation to the TS. I would greatly appreciate a written request from yourself to Mr Singleton to ask him clarify these matters in writing.

Having the TS and WMI ExA clarify these matters is important for two reasons. Firstly, unacknowledged and unmitigated levels of harmful, additional nuisance noise along the A449 between the WMI and J2 of the M54 will induce significant harm. It is incumbent on those who have misunderstood the facts to learn their lessons from this saga, and to recognise their errors to prevent this from happening again.

Secondly, the proposed M54-M6 link road has the potential ability to help mitigate some of the harm the WMI DCO has unleashed onto communities along the A449 between the WMI and the West Midlands conurbation. The M54-M6 link project is just beginning to be appraised/determined by its own ExA. The answers provided by the TS and Mr Singleton in relation to my 4th May 2020 questions may assist that body in answering some of the questions it posed on 20th July 2020[4].

The M54-M6 link road has been submitted by Highways England (HE) with a plethora of flaws. I have summarised a number of these in my registration to participate in that DCO appraisal as an 'interested party'[5]. The 71 pages of questions published by the M54-M6 Link ExA on 20th July 2020 fully confirms the scheme's poor conception, design and HE's shambolic grasp of how the strategic road network functions to the north of the West Midlands conurbation.

Now that the period to appeal the WMI DCO with Judicial Review has lapsed, I accept that the WMI scheme will be developed without contributing to mitigating the full extent of its harm. Instead the M54-M6 link road is now the only scheme with the potential capacity to provide mitigation to the A449 to offset existing and WMI induced harm. Even if the M54-M6 link road scheme is modified significantly, this would still be a relatively poor outcome, which could have been prevented had the right knowledge and scrutiny been applied by the WMI ExA and its consultees. The opportunity to extract a significant A449-developer contribution has been lost and now any mitigation will have to be paid for by the tax payer as part of the M54-M6 link road scheme.

I am keen to be pragmatic in encouraging Highways England, the M54-M6 Link ExA and the TS in developing a holistic understanding and approach to how the A449 is going to function and be managed in the decades to come. That can only happen by starting with the truth; however, unpalatable and humbling that might be for some of those who have been sent copies of this letter.

Yours sincerely,

Daniel Williams

[4] Questions 1.10.1 and 1.10.9 - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-000440-200720%20M54%20to%20M6%20ExQ1.pdf

[5] https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/m54-to-m6-link-road/?ipcsection=relreps&relrep=39383

APPENDIX 4

Post WMI Examination
Communication with PINs

[redacted]

[redacted]

From: Daniel Williams <[redacted]>
Date: 2 November 2020 at 16:37:16 GMT
To: "Pritchard, Chris" [redacted]@planninginspectorate.gov.uk>
Cc: M54toM6linkroad@planninginspectorate.gov.uk, WMInterchange@planninginspectorate.gov.uk
Subject: PINs Acknowledgement - The WMI DCO & the A449

Dear Mr Pritchard,

Thank you for your email.

Could you please indicate the approximate date you intend to formally respond by? Will it be in 2020? I appreciate that the matters I have raised are technically and politically difficult for PINs to explain away, nevertheless the clarifications that I seek will directly feed into the pending M6-M54 Link DCO. That DCO's EXA and applicant (Highways England) HAVE to be in full possession of all the facts as a matter of urgency.

Kind regards,
Daniel Williams

Sent from my iPhone

On 30 Oct 2020, at 17:04, Pritchard, Chris [redacted]planninginspectorate.gov.uk> wrote:

> Dear Mr Williams
>
> Thank you for your e-mail, addressed to my colleague Mr Plummer.

My name is Chris Pritchard. Your correspondence has been passed to me for consideration and reply, as part of the Customer Team at the Planning Inspectorate.

Please accept my apologies for the fact that you have not received a response to date. Whilst I realise that you would have preferred to have received a reply sooner, unfortunately the investigation into the points raised in your correspondence is taking longer than originally foreseen.

I will write to you again with a full reply, once the investigation is complete.

Chris Pritchard
Customer Team

<image002.png>

Putting the customer at the heart of everything we do.

twitter: @PINSgov
web: www.gov.uk/government/organisations/planning-inspectorate

This communication does not constitute legal advice. Please view our Information Charter before sending information to the Planning Inspectorate.

From: Daniel Williams <[redacted]
Sent: 27 October 2020 14:41
To: Plummer, Kevin <[redacted]@planninginspectorate.gov.uk>
Cc: West Midlands Interchange <WMInterchange@planninginspectorate.gov.uk>; M54 to M6 Link Road <M54toM6linkroad@planninginspectorate.gov.uk>
Subject: Re: Acknowledgement of your correspondence to the Planning Inspectorate - The WMI DCO & the A449

Dear Mr Plummer,

Could you please indicate when the Planning Inspectorate's internal investigation into the WMI DCO examination and the applicant's falsified acoustic evidence will report its findings?

Kind regards,

Daniel Williams

Sent from my iPhone

On 12 Aug 2020, at 08:28, Plummer, Kevin <[redacted]@planninginspectorate.gov.uk> wrote:

> Dear Mr Williams
>
> Thank you for your further email. A copy of our complaints process is available from https://www.gov.uk/government/organisations/planning-inspectorate/about/complaints-procedure.

Toi answer your specific questions:

The customer quality team investigate and respond to complaints made regarding Inspector casework.
There are no specific qualifications demanded in recruitment to the role. They are not Inspectors but have access to Inspector resource if needed for any investigation.
Complaints fall outside of the statutory process for the exchange and publication of representations whilst a case is still live, and are typically treated in confidence. However, where we find an error, we will consider appropriate remedies in light of the circumstances that apply.

Kevin Plummer
Customer Quality Team | The Planning Inspectorate | 3H Eagle Wing
Temple Quay House | 2 The Square | Temple Quay | Bristol BS1 6PN

☐ : https://www.gov.uk/government/organisations/planning-inspectorate
☐ : [redacted]@planninginspectorate.gov.uk
☐ [redacted]

From: Daniel Williams <[redacted]>
Sent: 11 August 2020 21:47
To: Plummer, Kevin [redacted]@planninginspectorate.gov.uk>
Cc: West Midlands Interchange <WMInterchange@planninginspectorate.gov.uk>; M54 to M6 Link Road <M54toM6linkroad@planninginspectorate.gov.uk>; Gavin WILLIAMSON <gavin.williamson.mp@parliament.uk>
Subject: Re: Acknowledgement of your correspondence to the Planning Inspectorate - The WMI DCO & the A449

Dear Mr Plummer,

Thank you for your email. I have a couple of questions:

1. Who are the 'customer quality team'?
2. What level of expertise/qualifications do they possess? Are they inspectors themselves?
3. Will the findings be published on the Inspectorate's WMI webpage for public viewing? If not, why not?

It is very disappointing to learn that Mr Singleton is not going to deal with the concerns and questions himself. Regardless of how thoroughly and robustly the 'customer quality team' examine what happened with regard to the duff A449-WMI sound data, the review will not be able to address the question of why Mr Singleton misunderstood/ignored my Deadline 8 - Section 2 submission. Only Mr Singleton knows the answer to that question and I would like that explained to me.

With regard to the 40 working day review period - I would urge the review panel to note that the open M54-M6 Link Road DCO will have a material and substantive interest in this matter, given that that DCO is specifically designed to relive the problems the WMI DCO has '*unwittingly*' contributed to.

Kind regards,

Daniel Williams

Sent from my iPhone

On 10 Aug 2020, at 11:17, Plummer, Kevin [redacted]@planninginspectorate.gov.uk> wrote:

> The West Midlands Interchange and the A449
>
> Dear Sir
>
> Thank you for your correspondence to Mr Singleton which has been passed to the Planning Inspectorate's Customer Quality Team.
>
> The Team is experiencing a backlog of correspondence and is currently taking **40 working days** to answer customer queries and complaints. We apologise for any inconvenience this may cause you and appreciate your patience whilst we seek to answer correspondence as soon as practicable.
>
> Where the issues raised are complex, a more detailed investigation may be needed that may require us to seek the views of others who were involved in the case. If further delays occur, we will keep you informed about our progress on answering your correspondence.
>
> While we will look into your points as thoroughly as possible, we have no power to change an Inspector's decision or reconsider the evidence the Inspector took into account. Only a successful legal challenge in the High Court can lead to an

Inspector's decision being cancelled and an appeal being reconsidered.

The time limits for making a legal challenge are explained in Annexe L of the Planning Inspectorate's published document, *Planning appeals: procedural guide*, which can be found on our website at:

- www.gov.uk/government/publications/planning-appeals-procedural-guide

You should not wait for our response if you are considering making a legal challenge and it is strongly recommended that you seek professional advice.

Information about our complaints procedure can be found at Annexe Q of *Planning appeals: procedural guide*.

If your correspondence is about a case that has yet to be decided, you should contact the relevant case team at the Planning Inspectorate in the first instance or our Customer Services Team on telephone 0303 444 5000.

Yours faithfully

Kevin Plummer
Customer Quality Assistant
The Planning Inspectorate
3B Hawk Wing, Temple Quay House, 2 The Square,
Temple Quay, Bristol, BS1 6PN

http://www.planningportal.gov.uk/planninginspectorate
Twitter: @PINSgov
Email: feedback@pins.gsi.gov.uk
Complaints Line: 0303 444 5884

This communication does not constitute legal advice.
Please view our Information Charter before sending information to the Planning Inspectorate.

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The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

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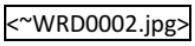


APPENDIX 5

Submitted Transport Assessment
Figures 3.15 and 4.12

Figure 3.15: Baseline Model AADT Flows - M54 / A460 (2015)

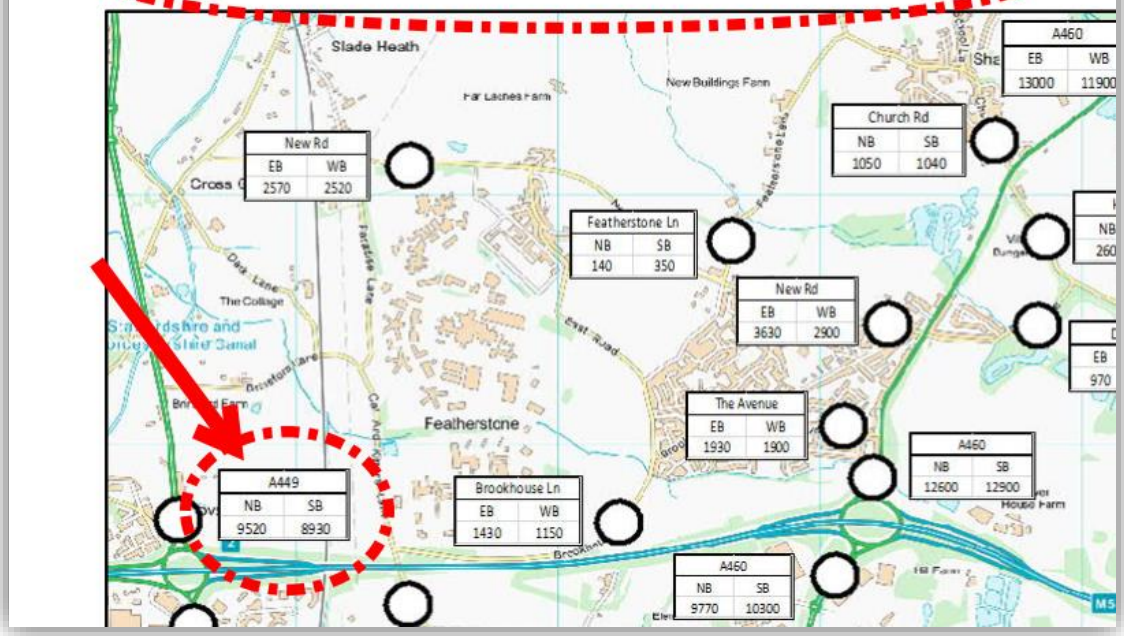
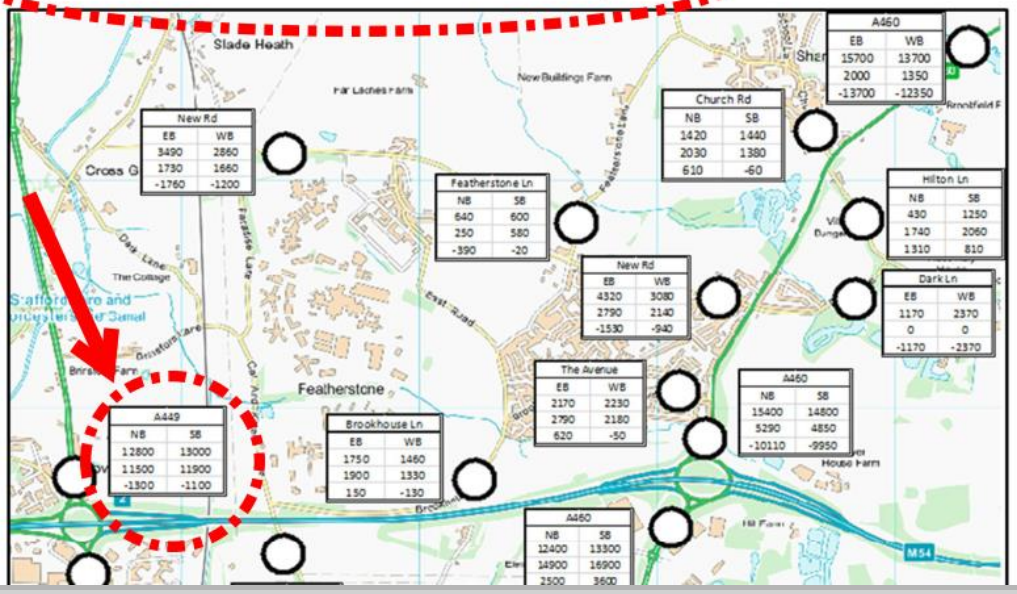


Figure 4.12: Forecast AADT Flows - M54 / A460 (2039)



APPENDIX 6

Potential Kettle Holes Within & Adjacent to the Proposed Scheme

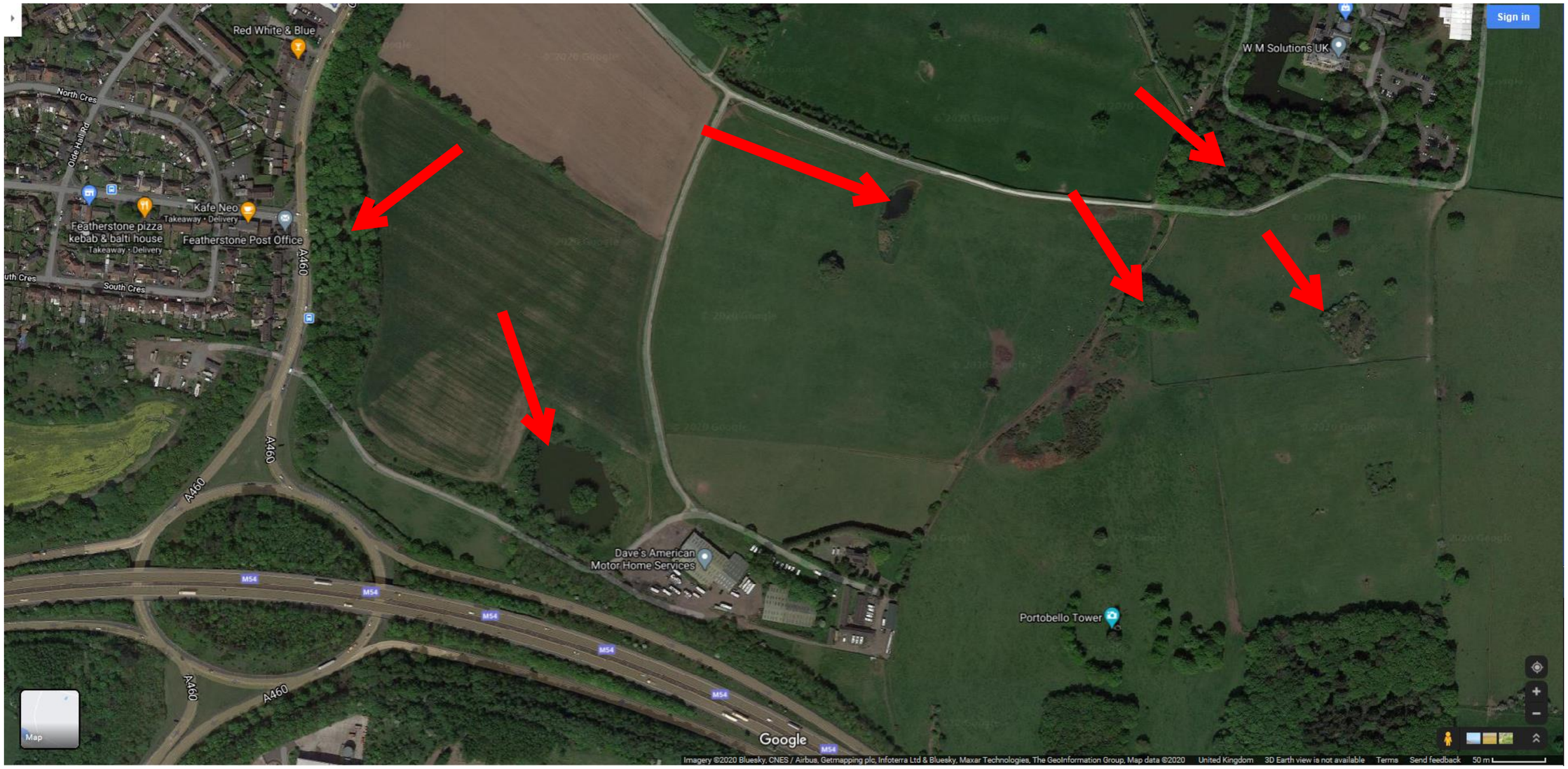

Red White & Blue
North Cres
Olde Hall Rd
Kafe Neo
Takeaway · Delivery
Featherstone pizza
kebab & balti house
Takeaway · Delivery
Featherstone Post Office
A460
South Cres
W M Solutions UK
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TABLE 1

A449 Vehicle Movements Comparison between DCOs

	Vehicle Movements WITH M54-M6 Link Road (Highways England Data) & With WMI Operating	Vehicle Movements WITHOUT M54-M6 Link Road (Highways England Data) & With WMI Operating*	Vehicle Movements WITH WMI & No New (HE) M54-M6 Link Influencing Flows (Four Ashes Ltd. Data)
Exising A449 Northbound	N/A	9520 (AADT in 2015)*	13987 (Daytime flow - 2016) + 1187 (Night-time flow - 2016)
Existing A449 Southbound	N/A	8930 (AADT in 2015)*	15129 (Daytime flow - 2016) + 1883 (Night-time flow - 2016)
Existing A449 Combined	N/A	**18450** (AADT in 2015)*	29116 (Daytime flow - 2016) + 3070 (Night-time flow - 2016) - **Total Per Day 32186**
Proposed A449 Northbound	2024 Unknown ?	2024 Unknown ?	18644 (Daytime flow - 2021) + 1885 (Night-time flow - 2021)
Proposed A449 Southbound	2024 Unknown ?	2024 Unknown ?	18561 (Daytime flow - 2021) + 2970 (Night-time flow - 2021)
Proposed A449 Combined	2024 Unknown ?	2024 Unknown ?	37205 (Daytime flow - 2021) + 4855 (Night-time flow - 2021) **- Total Per Day 42060**
Proposed A449 Northbound	11500 (AADT in 2039)	12800 (AADT in 2039)	20152 (Daytime flow - 2036) + 1997 (Night-time flow - 2036)
Proposed A449 Southbound	11900 (AADT in 2039)	13000 (AADT in 2039)	20074 (Daytime flow - 2036) + 3186 (Night-time flow - 2036)
Proposed A449 Combined	**23400 (AADT in 2039)**	**25800 (AADT in 2039)**	40226 (Daytime flow - 2036) + 5183 (Night-time flow - 2036) - **Total Per Day 45409**
		***WMI Operating N/A**	