

RESPONSE TO PLANNING APPLICATION PAP/2021/0663

Councillor Jacky Chambers [Dordon Borough Councillor]

Date 30th January 2022

Dear Planning Control Team

Please find the following comments on the above planning application for a warehouse facility and 150 place lorry park on land to the NE of Junction 10/ A5 Dordon.

STRATEGIC GAP

This application directly contravenes planning policy LP4 of NWBC Local Development Plan LP4, which prioritises the protection of the Strategic Gap. (Pg 26)

The comprehensive response by Dordon Parish Council describes in some detail how this development cuts across a number of the Community Objectives set out in the draft Neighbourhood plan for Dordon .

I completely endorse this statement.

In addition, I would also point out that hundreds of local residents have written to object to the erosion of the Strategic gap.

Their objections are that use of part of this agricultural land for industrial development will

- adversely affect the sense of outlook, identity and character of Dordon as a village
- visually create a sense of continuous “ribbon “warehouse development on both sides of the A5
- mean that by 2031 Dordon village will be surrounded on all sides by either residential and industrial development.
- affect their mental health and wellbeing and enjoyment of walking the footpaths to Birchmoor and Birch Coppice
- destroy the sense of rurality, openness and views of the horizon. The erection of a high security fence for the lorry park alongside the proposed footpath will simply add to the feeling of being enclosed and trapped.

Conclusion

This application should be rejected on the grounds that it contravenes the purpose of policy LP4 which is to :-

- retain and respect the separate identities and characters of the settlements of Tamworth and Polesworth with Dordon to avoid their coalescence.

NEED FOR MORE B8 EMPLOYMENT LAND

LP 6 of the Local Plan states that “Significant weight will be given in decision taking to supporting economic growth and productivity, particularly **where evidence demonstrates an immediate need for employment land, or a certain type of employment land**, within Area A on Figure 4.10 of the West Midlands Strategic Employment Sites Study of September 2015 (or successor study) which cannot be met via forecast supply or allocations

Any weight accorded to proposed employment provision by virtue of this policy **will be considered in the context of the policies in the plan as a whole in arriving at a balanced assessment**".

This application justifies the choice of this land for employment on the grounds that

- there is a growing sub regional and regional need for new employment land of between 20 – 100 hectares per year. They cite the 2015 West Midlands Strategic Employment Sites Study that within Area A/Area 2 which estimated there was an assessed need of at least 20 hectares per annum.
- there is only a 2 ½ year land supply of large sites allocated and available for the logistics sector in this region
- North Warwickshire took no account of these wider subregional needs when determining the amount [100 hectares] and location of employment land in its Local Plan.
- Tamworth cannot meet its need for employment land within its local authority area and, because of the interdependence of NW and Tamworth , a significant proportion will need to be met by sites in North Warwickshire.
- Between 2015 and 2019 the recorded number of employees in Tamworth fell by 4% - in contrast to a 10% growth in North Warwickshire – indicating the need for more employment land to become available
- The proposed site lies within Area A and meets the requirements of LP6 in so far as

(i) access to the strategic highway network is achievable and appropriate,

(ii) the site is reasonably accessible by a choice of modes of transport,

(iii) it is otherwise acceptable, taking account of the living conditions of those nearby.”

Dordon and Tamworth have slightly higher rates of claimants for out of work benefits [6.3% and 6.5%] than the national average 6.1%

My view is that a balanced assessment of this need for additional employment land and its use for the B8 logistics sector should take account of the following: -

Supply of land for the logistics sector

The projected land supply for the logistics sector within the areas identified in the WMSESS study [including the M42 corridor] is based on incomplete information and does not include more recent developments in Staffordshire, Birmingham and Worcestershire such as

- the high-quality 238-acre employment park being created by IM Properties at Junction 11 of the M42 in northwest Leicestershire [about 8 miles from Junction 10; This scheme will include a new 2.94 million sq ft global parts logistics centre for Jaguar Land Rover and a 450,000 sq ft sustainable logistics hub for freight forwarder DSV. Mercia Park state that over the longer term this employment park will support up to 3,400 jobs and will draw on a wide catchment of workers from both Tamworth and North Warwickshire

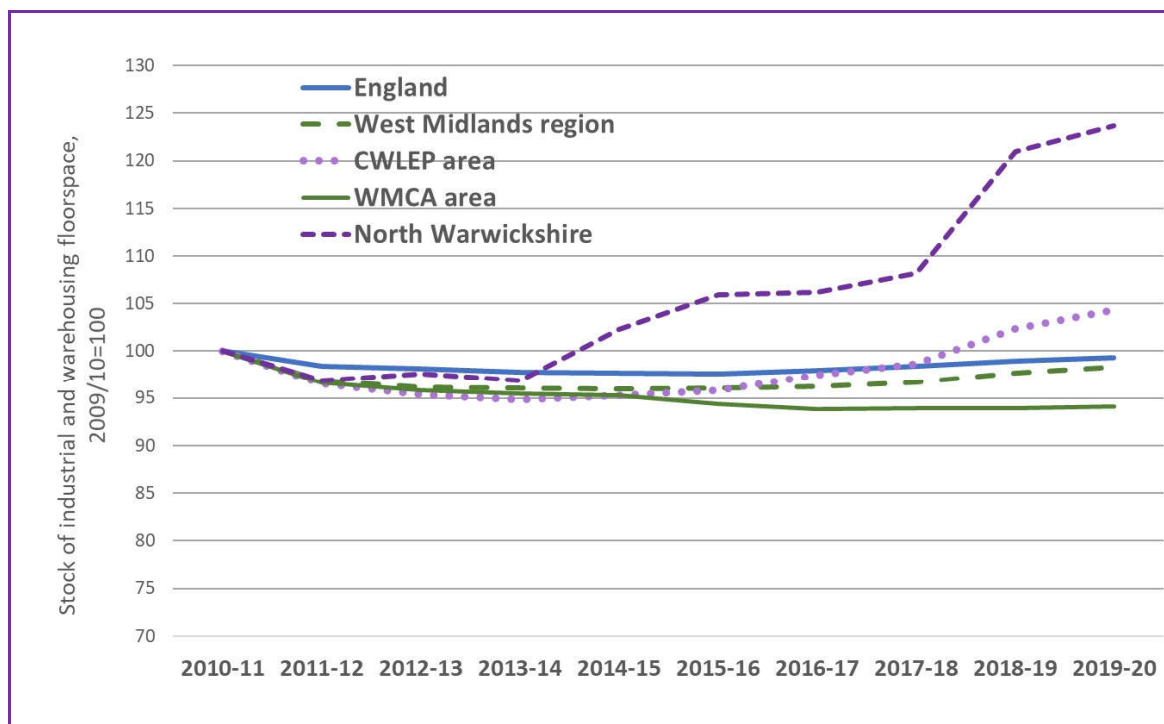
-the continued growth in logistics sites along the whole of the A5 corridoe [32-acre site St Modwens Park Tamwoerh 32 acres in North Warwickshire, the Horiba-MIRA Enterprise Zone

and Technology Park (2,000 jobs), Phase 3 of DIRFT near Daventry (9,000 jobs) and the 11,000 jobs anticipated at Magna Park near Lutterworth

-recent planning applications and approvals for other distribution warehouse at St Modwen park Stoke Central, 68 acre site east of Ashby de la Zouch , Leicestershire Castle Donnington , Cofton Centre Birmingham etc etc .

The economy of North Warwickshire

North Warwickshire has already taken more than its share of growth in industrial and warehousing floorspace in the CWLEP area which has risen from 11% to 21%. [See Figure 6.1]



- the CWLEP area from 11% to 21%.

Figure 6.1: Net change in stock of industrial and warehousing floorspace 2009/10 to 2019/20 (2009/10=100)

- Source: Nicol Economics analysis of Valuation Office Agency (VOA) Business Floorspace data for all "industrial" class uses for rating purposes, this **includes** warehousing

As a result our economy has become increasingly skewed towards lower skilled employment in the logistics sector, such that warehousing and transport industry now employs 1 in 8 workers in the area . In Dordon alone, low skilled occupations account for the greatest share of employment at ward level [21%] .

A report by Warwickshire County council <https://api.warwickshire.gov.uk/documents/WCCC-688-275>

points out that:

- qualifications in this industry tend to be low with a large number of workers employed in level 1 jobs.

- the logistics and transport industry is at the forefront of automation, which could lead to future employment issues
- in a post March 2020 world, it is predicted that North Warwickshire could potentially be the 11th worst hit Borough in England due to its reliance on logistics. This is devastating news considering how well the economy was performing. Recent economic data is showing that North Warwickshire is being resilient and is bouncing back post lockdowns. It is vitally important therefore that this bounce back is maintained and does not turn into a long-term recession.

logistics is one of the key sectors that will use automation. Automation itself is inevitable, however, the impact on our resident population is an important factor as to what interventions the Borough Council wishes to pursue in the future. Widening the employment base and ensuring our residents have the right skills to take up the job opportunities are important aspects of ensuring the borough will thrive into the future.

- North Warwickshire **is a place considered as one of the top two places to be most vulnerable to automation – this is referred to as “cliff-edge automation”**¹. It is ranked 2nd across England, Scotland and Wales behind Corby as a place at most risk of losing jobs due to automation. It is estimated that around 31% of employment, equating to 13780 jobs, are at most risk.
- there are currently more jobs than people within the Borough

Many warehouses are already struggling to find enough workers locally to staff their units and many are having to bus in people from surrounding areas [eg Birmingham, Nuneaton]

Residents who work in this sector tell me that if you search for “warehouse operative” on websites such as Indeed -<https://uk.indeed.com> or Total <https://www.totaljobs.com> and specify “within a 5 mile radius of Dordon or Tamworth”, more than 100 vacancies will appear.

The number of vacancies is far higher at peak demand times such as Christmas or other bank holidays. Clearly as far as local jobs in the logistics industry are concerned, there is **no immediate need for employment – quite the opposite is true**

The Borough already has very significant net in-commuting with the area seeing [2011 figures] 25,300 workers commuting into the district compared to 17,000 residents who commuted out (a net inflow of over 8,000); at 64%, the proportion of jobs in the local area filled by in-commuter was the highest of any district in Warwickshire. The Borough also has the highest rate of persons commuting to work by car in the country [93%]

Provision of additional housing and future employment

The application claims that this development will offer opportunities for more employment for the circa 3000 additional new houses which are planned in the Dordon /Polesworth area.

Given the probable price of new houses in this area - and current rental charges of between £ 850 [Watling] and £ 1150 a month [Connemara Close] it is unlikely that the provision of more low skill , low paid jobs will seem attractive to many new residents.

Conclusion

A balanced assessment of the need for more B8 employment land in the context of other policies within the local plan should lead to the conclusion that the

- need for more land or employment of this type has not been demonstrated
- rapid growth in the provision of logistics sites across the WM region has outstripped the ability of planners and consultancy firms to accurately present an accurate picture of land supply coming onstream
- North Warwickshire has taken more than its fair share of regional growth in logistics over the last 10 years. Further growth in B8 employment will continue to skew our economy and put at risk its economy from automation
- the proposed site will erode the Strategic Gap and was not considered during the process of identifying sites for employment was not selected in the Local Plan
- will add further to the pattern of inward commuting, increasing traffic congestion and growth pressures along the A5 corridor

TRAFFIC CONGESTION ALONG A5 AND JUNCTION 10 M42 /A5

The application states that the development will: -

- *not have a “severe residual cumulative impact “on traffic flows, queues and safety at Junction10 M42 Junction 10.*
- *not significantly increase traffic at a section that is “already operating at over-capacity”*
- *not materially change the way all junctions at Junction 10 M42 and along the A5 would operate.*

People who regularly drive along this stretch of the A5 believe that “ *this Junction simply won’t cope with any more traffic entering and leaving so close to the motorway – HGV driver Atherstone* “ and that “*another [fourth] set of traffic lights with HGV vehicles turning west across the A5 will cause queuing back to Dordon island , and further delays to their journey time - which at peak times [am] during weekdays is considerable.*

Various studies of the strategic flow of traffic along the A5 and at Junction 10 , M42 demonstrate that this stretch of road is extremely busy .

The application states that according to their traffic modelling exercise, traffic at Junction 10 M42 is “ in excess or at the limits of its theoretical operating capacity – and that this will worsen following the addition of development trips” . They then claim that the additional development trips will only lead to an increase traffic flow of 5.7% on the A5 [west of the proposed site access] and this additional activity will not materially change the way this road operates.

It is difficult to see how they draw such a conclusion since: -

- a) around 17 – 20000 vehicles travel along this stretch of the A5 each day
- b) the majority of traffic will be turning west from the site towards Junction 10 and have to cross over several lanes of the A5 in order to re-enter the strategic highway /motorway network
- c) at peak times , there could be between a 17% [am] and 21% increase [pm] in the number of HGVs travelling west from the site along the A5 towards Junction 10 [Sheet 6c]

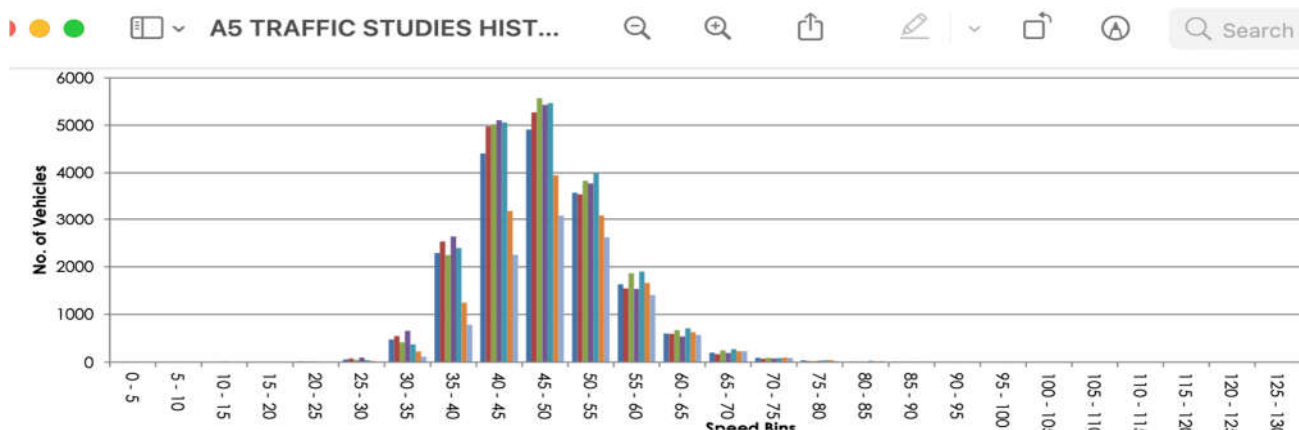
<http://planning.northwarks.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=396302>

- d) during the weekday morning peak there is sustained queuing of approximately 200 – 300 metres on the A5 [west] arm ie queues which already tail back to proposed signalised junction / site entrance
- e) at peak times traffic “bunches up “and tails back in the traffic lanes which turn R across the A5 as vehicles enter or leave the Birch Coppice site heading east particularly around 5 pm with the simultaneous arrival and departure of Morrison's Ocado and UPS delivery vans. These tail backs could seriously impede entry into the proposed site and lead to blockages at Junction 10.
- f) after development, the maximum queue lengths according to the LINSIG assessments appear to become unacceptably high – between 12 and 16 PCUs [Sheet 6 c – transport assessment]
- g) at present traffic picks up considerable speed between Birch Coppice junction and Junction 10. In 2020 the means speed was 60 mph
<https://dft.maps.arcgis.com/apps/webappviewer/index.html?id=fd65fd0e65b94bdca0205104c70273cdapone>

Furthermore approximately 34.6 % of vehicles exceed the 50-mph speed limit [see Lennon Transport Planning report ATC attached as Appendix 1]

Hence currently most vehicles can pass through when the traffic lights at the junction 10 roundabout are green.

Figure 1 shows observations taken in September 2021 by Lennon Transport Planning on the speed of traffic along the Watling [A5] almost directly opposite the proposed site entrance. This detailed traffic study was undertaken in response to Highways England consultation response to a planning application PAP/2020/550 [see attached pdf] . This figure clearly demonstrates how fast traffic flows along this stretch of road. The introduction of a signalized junction at a critical location on the A5 so close to Junction will lead to congestion affect the journey time of all users along this strategic travel corridor and in particular impact on volume of traffic clearance through green lights at `junction 10



Conclusion

This proposed development lies at a critical location close to Junction 10, M42 on a section of the strategic road network which is already operating at over capacity levels.

The cumulative impact of the additional development trips together with another signalised junction will be so severe and so wide ranging in terms of its impact on traffic flows that it should be refused.

NWBC did not select this site as a preferred area for employment within their Local Plan.

ENVIRONMENTAL IMPACT AND SUSTAINABLE TRAVEL PLANS

The applicants Framework Travel plan puts considerable emphasis on sustainable travel through walking, cycling, bus and train travel and assumes a modal shift of -10 % from 77.7% single car drivers to 67.7% [of which 4.8% is assumed to occur through car sharing]

Table 3 page 19 of this plan predicts that travel to work by car will remain high at 83.7% with no increase in the [5%] of people walking to work.

This lack of real ambition in relation to sustainable travel probably reflects that, in reality, there cannot be a genuine, safe choice of other transport modes to this site.

The pedestrian and cycle desire lines set out in this figure, would require many workers travelling from Tamworth to go along the A5 and cross over at Junction 10, M42 roundabout.

Since the application states that there is a particular need for employment in Tamworth, the safety issues which already exist at this junction will be exacerbated.

A review of Personal Injury Accident records showed that 33 recorded incidents between 2016 and 2020 occurred at the M42 Junction 10,



Finally, the frequency of bus service and the nearest rail links are very poor and unlikely to offer a real alternative for shift workers at night or at weekends. At Birch Coppice very few workers use public transport and special buses have to be put on to bring workers from further afield.

The assessment of the environmental impact on air quality in this application excludes from their modelling exercise the high monthly pollution readings on the A5 taken in 2019 on the grounds that these readings were “an outlier”.

They also dismiss concerns about these readings on the grounds that they were taken at a sampling site near a bus stop / car park and traffic would be “idling”.

The applicants clearly do not fully understand the way in which sampling of air quality along the A5 is undertaken [see figure 1 below] nor do they acknowledge that if traffic [especially HGV traffic travelling west along the A5] backs up as a result of increased congestion and delays in traffic flows due to their development, the health of residents living all along this side of the A5 will be seriously compromised .

Figure 1



Their assumptions that over time, pollution levels due to transport emissions along this road will fall are erroneous, according to a report by Midlands Connect.

<https://www.midlandsconnect.uk/media/1742/mc-transport-strategy-refresh-2021-v6.pdf>

Transport emissions in the Midlands actually increased by 5% between 2014 and 2019¹⁰. Midlands. The Midlands Connect report states because of many more HGV trips on our roads, any benefits gained from a gradual shift to electric cars will be “eroded away by current forecasts of population and economic growth generating more trips and longer distance travel. Their baseline assumes [as does DfT] that HGVs will still all be diesel in 2050

The projected increase in traffic volumes from committed and allocated employment and residential sites in the plan is already expected to be between 28.9% and 29.3% by the end of plan period. [NW Strategic Transport Assessment 2017 – Local Plan]

As a key corridor running from the south, serving the central area of the Country and acting as a significant distribution route for road-based freight, the A5 accommodates significant HGV flows. HGVs currently account for 12.5% of all traffic along this section of the A5 [Reference traffic observations in Sept 2021 - Lennon Transport plan]

Finally, the application is for a stand-alone warehouse facility with no specific or concrete plans for rail connection. The data used in the report on rail use is based on hypothetical assumptions which involve additional HGV trips from the rail link to the proposed site and assumed permissions for access. They seem to have little substance in terms of practical operations. Therefore, unlike other rail – road-integrated logistics sites, there will be no opportunity to shift more freight by rail to and from these warehouses and to help address the issues of climate change

Conclusion

This development should be refused on the grounds that

- it does not meet the NPPF requirements for sustainability
- the sustainable transport proposals contain insufficient mitigation measures to enable a modal shift in travel and thus permit the use of this land for warehouse employment and lorry park.
- the environmental impact on air quality and residents living along the A5 and in Dordon village will be unacceptable
- the projected increase in traffic as a result of growth in housing and employment in the Local plan will be around 29%.

PLANS FOR A 150 PLACE LORRY PARK

The application rightly highlights the national and identified regional for more lorry parks and argues that in many respects it meets the criteria for suitable HGV parking sites set out in Table 7.1 including immediate proximity to the strategic highway network and 24-hour security

It provides evidence on the shortage of adequate places for lorry drivers at Junction 10 Tamworth Moto services, crowding and overspill of lorries into insecure laybys which lack any toilet, shower facilities or hot food for overnight stay or rest.

Clearly providing drivers with suitable wash and food facilities, to enable them to have a pleasant overnight rest, is important for improving driver morale, perception and road safety.

However its location so close to the villages of Birchmoor and Dordon and the footpaths which connect these two villages means importantly, that it does not meet one of the criterion described in Table 1: -

Located away from residential areas or other unsuitable locations.

More than 300 residents have written to object to this planning application – many give as their reasons that they: -

- do not wish to have the noise, litter and light pollution of a lorry park so close to where they live
- do not believe the mitigation measures through treeplanting and buffers will be sufficient to mitigate the impact of this lorry park on their quality of life – [see my Borough Cllors report to Dordon Parish Council [Appendix 2]
- are concerned about potential increase in crime and antisocial behaviour originating around a lorry park.

Finally, it should be noted that planning permission for an additional 38 lorry park places at Tamworth Moto service station have already been approved.

Conclusion

This application should be rejected because it is not consistent with the policies set out in NPPF Section 12 paras 126 and 130.

Cllor Jacky Chambers

