

## Stop the West Midlands Interchange

### 5<sup>th</sup>/6<sup>th</sup> June Post Hearing Submissions

#### Site Wide Travel Plan April 2019

##### Summary

- The mitigation plans are weak. The targets the applicant is setting to reduce cars travelling to the site are low (reducing from 84% car usage to 74% car usage). The public transport plans are weak (very few buses) and some of the ideas such as encouraging cycling are unrealistic given the complete lack of suitable infrastructure (beyond the A449 where are the other roads suitable for bikes?)
- The applicant has proposed a steering group to review and make improvements to any issues that arise. Worryingly SSDC are there as non-voting members, therefore how will local residents' views be heard. The governance for this steering group is worrying too. Only two meetings a year, and if a problem is identified, it then gets researched, presented at the next meeting, then a plan put forward at the next meeting etc. So the timeline for resolving any identified problems will take 18 months to 2 years, as and when transport problems occur.
- The mitigation plans don't represent reality. The applicant addresses the remodelling that has recently taken place at Gailey island as being a benefit, despite the fact that this has increased traffic and tailbacks. The HGV travel plan has limited waiting places for HGVs, and the mitigation is that signs will be put up to restrict parking in local laybys to 2 hours. Who will enforce this? HGVs have been parking in lanes around Brewood and Coven recently as there isn't enough space at the lorry parks. SO this situation will only get worse.

1.1.5 The SWTP describes the various measures that would be implemented in order to maximise the use of non-car modes of transport for travel to/from the Proposed Development. In addition, there are proposals to improve walking and cycling infrastructure in the local area, to encourage further use of non-car modes of transport. The overall management and implementation of the SWTP will be the responsibility of the Travel Plan Co-ordinator under the employment of FAL. The SWTP will be used as an overarching document within which individual occupiers with more than 50 employees will produce their own Occupier Travel Plans (OTP). OTPs will need to be approved in writing by Staffordshire County Council as local highway authority, in consultation with Highways England prior to any warehouse or rail terminal being brought into use.

**Groups Response:** Walking and cycling? to/from where, when the majority of jobs are being created outside of the locality.

1.1.12 Responsibility for implementing, reviewing and managing the SWTP will be with the Transport Steering Group (TSG). The TSG will include Four Ashes Ltd

(FAL) and local authority representation. The TSG will shape the delivery programme and review performance over time.

**Groups Response:** What is the governance for this? How will it work? Will the TSG actually be able to influence anything?

**1.1.16** Information gathered from these surveys will support a regular review of the Travel Plan to ensure the overarching objectives are met over time. Should target outcomes and objectives not be met, a recovery process will be initiated whereby funding for an additional agreed package of measures, and over an agreed programme period, will be secured from the Travel Plan Contingency Fund.

**Groups Response:** This recovery process will not be able to remove the development if the issues are incapable of remedy.

**1.1.17** This SWTP also recognises the potential to deliver sustainable transport improvements working in partnership on an area-wide basis. Sharing best practice and the possible joint-delivery of initiatives with other major employment sites locally, such as i54 Business Park, will be actively pursued to leverage even greater impacts locally in reducing the overall number of vehicle trips on the network during peak periods, and promoting healthy, low carbon and sustainable travel alternatives.

**Groups Response:** What are these initiatives? i54 is a significant distance away with very limited ability to do anything.

**2.2.5** It is expected that approximately 8,550 staff will be employed at WMI. A series of shift patterns are also likely to be adopted over a 24 hour period. It is expected that 30% of employees will work typical office hours. The remaining staff are expected to be split across the following shift patterns.

- 06:00 to 14:00;
- 14:00 to 22:00; and
- 22:00 to 06:00.

**Groups Response:** 8,550 staff - and the sustainable solutions being proposed are an increase to a half hourly service and 3x shuttle buses?

**2.3.4** Furthermore, the SWTP recognises the potential benefits of an area-wide approach to delivery. In this regard the plan identifies opportunities to be developed in dialogue with i54, an existing major local employment site in the vicinity of the WMI planned development, to determine how best to leverage desirable travel outcomes from a partnership-based approach to travel planning.

**Groups Response:** What are these desirable outcomes? What are the proposals? Why have there been no detailed proposals.

## **Planning and Policy**

**3.1.1** The sustainability of new development is of paramount importance and this is reflected in national planning policy and guidance on promoting lower carbon transport options such as walking, cycling and public transport, whilst advocating a reduction in private car use. This chapter outlines the national and local policy context and best practice guidance under which this Site Wide Travel Plan has been prepared.

**Groups Response:** This development will increase private car use.

**3.2.3** As encouraged in the NPPF, the development has been planned in such a way that gives people a real choice regarding their mode of travel. Its density and proximity to local facilities ensures that sustainable modes can be considered a favourable option for local trips.

**Groups Response:** Yet is removing choice for local residents. There are no proposals for improving services.

### **Local Policy Guidance**

**3.3.1** The Staffordshire Local Transport Plan (2011) presents a clear policy aspiration to promote sustainable transport modes as a means to minimise transport impacts on the environment.

**3.3.2 Policy 5.1** 'We will promote alternatives to private motor vehicles' emphasizes this point by stating that this can be achieved in part by 'encouraging major employers to develop travel plans as a way of managing travel to and from work in a sustainable way'.

**Groups Response:** An 8 year old policy that SCC has failed to deliver. With reduction in bus services, and no increase in rail connectivity, this has not been achieved.

### **4.1 Travel Plan Aim**

**4.1.2** Information, incentives and encouragement needs to be applied to influence how people choose to commute to work. Therefore, the headline aim for the WMI SWTP is: 'To create an environment for employees that actively promotes a range of sustainable, low carbon travel choices and reduces the overall need to commute to work by car'.

**Groups Response:** Why has there been no financial disincentive to drive? Eg: workplace parking charges.

**4.2.3** This will also specifically influence employee attitudes towards their own travel behaviour by considering sustainable travel alternatives for everyday trips, as opposed to single-occupancy car travel.

**Groups Response:** Considering rather than mandating?

### **4.3 Committed Highways Improvement**

**4.3.1** Between January to April 2019, Highways England have undertaken junction improvements on the A449/A5 Gailey Roundabout which has been designed to improve safety for cyclists and pedestrians at this location. This work involved improving traffic signs, crossing facilities and reprofiling the roundabout central islands.

**4.3.2** These enhancements on this roundabout will help in the encouragement of sustainable travel movements in the areas.

**Groups Comments:** These changes (not regarded as improvements) have done little to improve safety. They have however significantly increased queue times by reducing the island approaches to 2 lanes.

## **5.0 Site Wide Travel Plan Measures**

### **5.2 Improving Sustainable Transport Facilities**

**5.2.1** Bus services to and from WMI will need to provide direct, timely connections for employees; notably with major settlements such as Wolverhampton, Stafford and Walsall. Allowing employees to effectively interchange between these bus services and onward rail connections will also support a viable door-to-door journey using sustainable transport.

**Groups Response:** Why are there no improved bus services for surrounding villages given the claims from the applicants of the employment benefits. Why are there no s106 improvements for local residents.

**5.2.4** In addition to the enhanced public bus service it is proposed that shuttle bus services will also operate to WMI from specified collection points in the Wolverhampton urban area, Cannock and Walsall. These shuttle bus services will be particularly geared to those early and late working shifts whose connecting bus to Service 54 may not operate in the early morning or late at night. Provision has been made for three shuttle bus vehicles. However, the exact level of shuttle bus service provision will only be decided nearer occupation, to be agreed by the Transport Steering Group, and considering conditions at that time. Proposed routes of the shuttle bus are shown on Figure 3. The TSG will liaise with officers of Staffordshire County Council with responsibility for Employment, Skills and Training in order to advise them of the routes of the shuttle bus. This is in order to ensure that any future relevant employees of WMI will be made aware of the availability of the shuttle bus routes and how it can be used to travel to WMI.

**Groups Response:** 3 vehicles –there is no indication of capacity and no commitment. The TSG will determine this but it is unclear how they will implement.

**5.2.5** The shuttle bus service will utilise vehicles with a minimum specification of Euro 6 standard and branded livery to present a direct and attractive option for employees to commute to and from WMI. However, the exact specification of shuttle buses as it relates to emissions standards will only be decided

nearer occupation, to be agreed by the Transport Steering Group. This will allow better technology to be utilised if available.

**Groups Response:** Why Euro 6 and not electric as the developer is at pains to emphasise their environmental credentials. How does this reduce carbon?

### **Electric Vehicle Charging Points**

5.2.10 The market for electric vehicles now provides a good range and level of performance.

**5.2.11** By providing a number of secure charging points within the development, those who feel that they need a vehicle may be encouraged to choose an electric car. This offers a social benefit of zero harmful emissions from the vehicle. There are personal benefits for the owner of the vehicle as it will be exempt from road tax. Consequently, this will be provided in accordance with Case Study Example] Thames Valley Business Park near Reading is home to circa 9"000employees The park is served by dedicated shuttle bus services providing connections to local urban centres and public transport interchange The business park has developed a smartphone application that provides real time journey planning information on the service to the park employee Available on both iOS and Android" the application has over 2"000 download.

**Groups Response:** Is this business park a warehouse site with shifts? If not it is not a valid comparator. Downloads but not active users?

### **Sustainable Travel Information Pack**

**5.3.2** A Sustainable Travel Information Pack will be prepared by the SWTPC and be provided to all employees at WMI. This information will be made available prior to scheme opening and will include for example details of the scheduled bus services. In addition, details will be provided promoting the facilities that will be available to cyclists who wish to travel by bicycle to WMI. This will include advising cyclists of cycle routes that will be available from specific centres of population, together with details of the availability of parking, showering, changing, areas for drying clothes and storage facilities at each specific unit.

**Groups Response:** Which centres of population. It is difficult to see how the cycle routes can be used. There is poor provision outside of the A449. Cycling along the A5 in the dark? The A449 through Penkridge in the dark? Country lanes in the dark? The canal in the dark?

### **Site Wide Travel Plan Website/Social media Feeds**

**5.3.11** The SWTPC will maintain oversight of the website content and make recommendations for additional content where appropriate; for example to advertise a new travel initiative or service improvement. They will also be responsible for providing social media content to disseminate directly to employees at WMI as required.

**Groups Response:** oversight? Who is producing / managing this?

Case Study Example: Thames Valley Business Park utilizes a dedicated sustainable travel website to provide multi modal travel information to employees and visitors. The site also incorporates social media feeds to provide Real time updates on traffic conditions and transport services as necessary.

**Groups Response:** What changes has this driven? No benefits or metrics are cited.

### **Employee Discounts**

**5.3.17** Employee discounts with services providers, or for sustainable transport related purchases, may be secured given the sizable number of employees located at WMI. This might include fare discounts with bus operators or discounted bicycle or cycling accessory purchases from local retailers.

**Groups Response:** May? Have any conversations taken place with the travel operators? Or is this fanciful thinking from the applicant.

**5.3.18** Should sufficient employee discounts become apparent, the SWTPC will examine the best way to ensure employees will easily access the entitlements. This may include establishing a Sustainable Travel Discount Pass, which all WMI employees will apply for, or forming a partnership with an industry provider that will manage and disseminate such offers to the employee base at the park.

**Groups Response:** Should??

### **Directional Information & Signage**

**5.4.8** Drivers will be informed to follow the strategic directional signage which is proposed to be introduced from the M6 and M54 to ensure drivers remain on the strategic road network. This will be complimented by signs on the A5 and A449 which will be located prior to minor road access, to ensure driver confidence and deter any potential 'rat running' through minor roads.

**Groups Response:** This is utterly ineffective. During SRN closures HGVs routinely ignore signage and follow their sat navs. The roads around Crateford are used as rat runs, a situation worsened by the traffic signals introduced at Four Ashes and Crateford.

### **5.5. Occupier- Specific Measures**

**5.5.2** At this stage the occupiers of individual employment units are unknown, as are their operational characteristics, operating margins, budgets and funding availability. Therefore, we have identified certain measures which should be considered and then feature within occupier-specific travel plan documents. These documents will be prepared by all occupiers with a minimum of 50 employees and will be submitted within six months of the occupier commencing their tenancy to the local highway authority for approval following consultation with Highways England as provided for by the s.106 Agreement.

**Groups Response:** So if margins are low they will be able to do nothing?>

### **Flexible Working Hours/Compressed Working Week**

**5.5.12** Flexible working hours allows employees to fit their working hours around their individual needs, and accommodate other commitments outside of work. They do this by communicating with their employer to create an adaptable work schedule. In most circumstances all employees working flexitime in a particular organisation will work the same number of hours as those working ordinary shifts only they may or can change the hours they work each day, week or month.

**Groups Response:** The majority of employees will be manual shift workers. Realistically how much of these work flexibly?

**5.5.16** This can result in reducing the overall number of trips made to and from a workplace as a proportion of staff compress their working time into a shorter period. Therefore, where operational requirements permit, employers at WMI will be encouraged by the SWTPC to examine the potential for flexible working hours and compressed working week arrangements amongst employees.

**Groups Response:** These points relate to office - based employment – not warehousing.

### **Remote/Home Working Opportunities**

**5.5.20** Home working may only be suitable for a small number of employees within a business, but can reduce the overall number of journeys to and from the site. Therefore, each occupier will also be encouraged by the SWTPC to explore the potential to introduce home working where possible.

**Groups Response:** Only a small number?

### **Video/Tele-Conferencing Facilities**

**5.5.21** Making available video and audio conferencing facilities will allow employees to use them instead of travelling for some business journeys. The SWTPC will highlight the benefits of these facilities to companies at WMI where it appears applicable to their business operation.

**Groups Response:** For warehouse staff?

## **6.1 A449 Stafford Road Corridor**

**6.1.1** The WMI development site is situated on the A449 Stafford Road corridor between Wolverhampton and Stafford. This corridor also provides access to other sizeable employment sites; notably the i54 business park located at Junction 2 of the M54 Motorway.

**6.1.2** i54 is presently home to major employers including Jaguar Land Rover and MOOG Aerospace, with circa. 3,000 employees based at the business park.

**6.1.3** Notably the park also has an existing travel plan in place and is already delivering a wide range of initiatives with companies on site to facilitate and promote sustainable commuting. This was recognised with i54 being shortlisted for a 2016 Modeshift National Sustainable Travel Award.

**Groups Response:** i54 is an entirely different development - situated within the West Midlands boundary.

**6.1.6** Therefore, the potential exists for WMI and i54 to examine a partnership approach to travel planning on the A449 Stafford Road Corridor. As major employment destinations this presents opportunities to operate on an areawide basis and potentially leverage greater returns on combined investment in sustainable transport services and promotional initiatives.

**Groups Response:** Why has this not been done in advance?

## **7. Travel Plan Management**

**7.1.1** Robust and effective management of the Site Wide Travel plan (SWTP) will be critical to successfully achieving the aims and objectives detailed in Chapter 3. To this end, Four Ashes Ltd will retain overall responsibility for ensuring the development and implementation of the SWTP and will ensure that it is reviewed and updated as necessary. The intended management structure for travel planning at WMI is shown below in Diagram 7.1.

**Groups Response:** Governance. What influence will the steering committee have?

### **Transport Steering Group**

**7.1.7** The TSG will meet at least twice annually and will be responsible for maintaining oversight of plan delivery, deciding and making recommendations (as applicable) as to how the funds secured in the s.106 are to be applied and any other matters. The TSG will not be the approving body in relation to any amendments to the SWTP, which is for the local highway authority, in consultation with Highways England, but may make recommendations to the local highway authority in relation to any such changes.

**Groups Response:** Only annually to resolve issues and concerns of residents?

**7.1.9** The TSG will be Chaired by the SWTPC, and will comprise the representatives as set out in Table 1. All decisions of the TSG will be by a majority vote with each of the Principal Parties identified in the Table below having one vote. Any decision which is required to be taken by the Steering Group relating to the level of bus service, the Shuttle Bus, the use of the Travel Plan Contingency Fund and any recommendation as to the use of the Contingent Traffic Management Fund will be notified to the Steering Group by the SWTPC a minimum of 21 days in advance of the meeting at which the decision is intended to be taken along with all information necessary to inform that decision. In the event of an even vote causing an impasse, or if a voting member of the TSG is aggrieved by a decision of the



TSG, the matter shall be dealt with in accordance with the Decision Review Mechanism (paragraphs 7.3.7 to 7.3.13).

**Groups Response:** Chaired by the applicant?

**Transport Steering Group representatives**

**Groups Response:** SSDC are a Non-voting party – so there will be no representation for local residents.

**Outcome Target: Modal Shift for Commuting to and from Work**

**9.1.6** Table 5 identifies the mode share projections that the Transport Assessment Report has detailed can be achieved without the Sustainable Transport Package (public transport strategy, travel plan measures and parking standards). This modal share has been used as part of the methodology used to determine the operation of the highway network with WMI in place.

<b>Travel Mode</b>	<b>Mode Share</b>
Car driver	83%
Car Passenger	7.5%
Bicycle	4%
Bus	3%
Train	1%
Motorcycle	1%
Walking	0.5%

**Groups Response:** 83% is rather high.

**Table 6:** Peak Period Forecast Modal Split Target (Journeys to Work) at Full Build-Out, incorporating Sustainable Transport Package.

<b>Travel Mode</b>	<b>Target Mode Share</b>	<b>Change (% Mode Share)</b>
Car Driver	73%	-10
Car passenger	12.5%	+5
Bus	8%	+5
Bicycle	4%	-

Train	1%	-
Motorcycle	1%	-
Walking	1%	-

**Groups Response:** This shows no switch to non-carbon transport. Despite all of the measures they will be unable to increase train bicycle or walking.

### **Recovery Action Plan**

**9.3.5** The SWTPC will subsequently cost the additional measures and provide an indicative delivery programme to the TSG for approval. The SWTPC will then seek approval from the TSG for funding to be allocated from the Travel Plan Contingency Fund for delivery in the forthcoming year.

**Groups Response:** How many years will this take?

### **Network Rail**

#### **Groups Response (Rail Expert)**

Network Rail described the nodal yards as being at Crewe and Basford Hall. In fact Basford Hall is in Crewe and therefore the other nodal yard would be Bescot. However, Bescot is about to be lost as a “nodal yard” because Network Rail are converting the Downside into a concrete sleeper factory. This will mean that Bescot will not have any capacity to accommodate the 775m trains. In 2001 money was spent on relaying some of the Downside to add long sidings to accept the 775m trains however these will be lost when the concrete factory is built.

There is a loop at Bushbury but the nodal yards as stated above are Basford Hall in the north and Bescot in the south.

Can Network Rail guarantee the ability to hold and marshal 775m trains at Bescot, after the yard has been converted to a sleeper factory?

NB: a crossing in Bushbury junction cracked some weeks ago. A replacement needed to be sourced from Germany with a lead time of 13 weeks minimum. In the meantime Bushbury junction could not be used by trains coming in from the Bescot direction. This meant that trains coming in from Southampton or London Gateway could not run directly via Bushbury. They would have needed to go either via Wolverhampton which is not acceptable due to the number of passenger trains affected. The alternative would be to run direct to Crewe Basford Hall, turn around and return via Stafford and the big problem with rail is the sheer volume of trains on the network.

