

NEWRIVER, FOUR ASHES PUBLIC HOUSE, FOUR ASHES

APPLICATION BY FOUR ASHES LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE WEST MIDLANDS INTERCHANGE

PINS REF: TR050005

CONNECT TECHNICAL NOTE 02 – OBJECTION ON BEHALF OF NEWRIVER TO PROPOSED RIGHT TURN BAN AT THE A449 STAFFORD ROAD / STATION ROAD JUNCTION

18TH JULY 2019

1.0 Introduction

- 1.1 Connect Consultants Limited ('Connect') is a firm of transport planning and highway design consultants that have been instructed by NewRiver in relation to the Four Ashes Public House at Four Ashes.

2.0 Background

- 2.1 Connect have previously submitted a written objection on behalf of NewRiver dated 4th April 2019. Connect also attended and spoke at the 'Issue Specific Hearing 2: Accessibility and Transport' on 5th June 2019.
- 2.2 Part of the West Midlands Rail Interchange (WMI) scheme are proposed mitigation measures to ban right turning vehicles from the A449 south to Station Drive east at the A449 / Station Drive signal junction. NewRiver's suggested alternative is to close Station Drive to all vehicular traffic at the rail bridge (maintaining a link for non-vehicular traffic). The turning head on the western side of the rail bridge, proposed by the applicant, would remain.
- 2.3 Following the written submission and hearing, WSP have produced 'Transport Technical Note 42 – Impact of Closing Station Drive at the Rail Bridge' dated 14th June 2019 (WSP TN42).
- 2.4 This technical note, Connect Technical Note 02, provides commentary on WSP TN42.
- 2.5 It should be noted that, at the hearing which Connect attended, Connect highlighted errors in the applicant's traffic flow diagrams regarding northbound and southbound predicted traffic flows along the A449 between Station Drive and the proposed link road.
- 2.6 Connect noted that the traffic leaving one junction was significantly different from the traffic arriving at the next junction, despite there being no other junctions in between. The 'baseline' flows had identical traffic leaving one junction and arriving at the next, and therefore the error must have arisen in the 'proposed development' flows.

- 2.7 Email correspondence between Connect and WSP has resulted in WSP suggesting that the missing traffic is related to U-turning movements at the A449 / Link Road roundabout, and that the error on the diagrams does not affect modelling output.
- 2.8 We note that no corrected traffic flow diagrams have been issued, and casts doubt over the reliability of the analysis, and it raises the question of what other movements have been excluded from the publically available diagrams and information, which also relates to the wider issue of transparency and scrutiny.

3.0 Connect General Response to WSP TN42

- 3.1 WSP's stated aims for the mitigation scheme are set out at Paragraph 2.5 of WSP TN42. It is useful to reproduce them here for context.

2.5 In order to respond to these comments, the applicant proposed to modify the A449 / Station Drive junction to ban right turn movements from the A449 south. The purpose of this modification was to: -

- Seek to reassign existing traffic travelling from south to east from Vicarage Road to the proposed A449/A5 link road and reduce rat running traffic;
- Act as a traffic management measure to ensure WMI traffic travelling from the south, in particular HGV's could not utilise Station Drive/Vicarage Road to access the site, thus reducing traffic along this route.
- Banning the right turn would also physically prevent HGV's from the south from utilising this route and encountering the reduced height bridge or striking it if attempting to pass beneath it. ; and
- In general terms, to provide a highway mitigation strategy that would provide sufficient measures to ensure that traffic utilised the primary road network, rather than leading to a position that may lead to traffic using inappropriate routes.

- 3.2 WSP assert that their proposed right turn ban best achieves these objectives, and that vehicular traffic local to the dwellings on Station Drive could travel north on the A449, U-turn at the proposed A449 / Link Road roundabout, travel south on the A449 and turn left on to Station Drive.
- 3.3 Connect believe that closure of Station Drive at the rail bridge, as proposed by NewRiver, better achieves all of WSP's stated aims as it would be physically impossible for vehicles to pass under the rail bridge along Station Drive. Regular users of the area would become familiar with the new layout, and mapping for satellite navigation would be updated and no longer suggest Station Drive as a through route for vehicles.
- 3.4 Connect believe that WSP's mitigation proposal (and justification) is flawed, for several reasons:

- *“Rat running”* (in WSP’s terms) would still occur from East to South. This includes existing traffic and would be exacerbated by additional traffic associated with the proposed development. None of this traffic would *“utilise the primary road network”*, and would be using an *“inappropriate”* route.
- *“Rat running”* could still occur from South to East, via a U-turn at the A449 / Link Road roundabout, travel south on the A449 and turn left on to Station Drive. This includes existing traffic and would be exacerbated by additional traffic associated with the proposed development. None of this traffic would *“utilise the primary road network”*, and would instead be using an *“inappropriate”* route.
- HGVs (WMI and non-WMI) travelling from East to South would still be drawn along Station Drive (following advice from satellite navigation which is not HGV specific). This does not solve the problem of *“encountering the reduced height bridge”*, and exacerbates the issue with the addition of HGVs associated with the WMI.
- HGVs (WMI and non-WMI) from South to East could also U-turn at the roundabout, travel south on the A449, and turn left in to Station Drive (following advice from satellite navigation which is not HGV specific). This does not solve the problem of *“encountering the reduced height bridge”*, and exacerbates the issue with the addition of HGVs associated with the WMI.

3.5 The following is an extract from the meeting notes provided at Appendix B of the Transport Assessment (Document 6.2, APP-131, ‘6.2 Environmental Statement Appendix 15.1 Appendix B Meeting Notes’ on the Planning Inspectorate website).

1.4 Potential Station Drive mitigation – SCC suspect full road closure and width restriction would not find favour locally and instead suggested that thought be given to a width restriction from the A449. WSP suggested the provision of a Vehicle Height Activated Warning sign could also be considered. The key point is to do all practically possible to prevent HGVs actually turning into Station Drive although this could be supplemented by the provision of the turning head shown on the proposals. Road closure/width restrictions would also have implications in terms of traffic routing so were not favoured from the HE perspective.

- 3.6 Based on this, the decision to dismiss the closure of Station Drive was based on the *“[suspicion that] full road closure and width restriction would not find favour locally”*.
- 3.7 Connect have approached residents on Station Drive who are generally in support of Connect’s proposals for closure of Station Drive at the rail bridge.
- 3.8 Furthermore, with regard to finding favour locally, Table 29 and paragraph 9.2.15 of the Transport Assessment (Document 6.2) indicates that queue lengths increase significantly on the Station Drive arm of the A449 / Station Drive junction, however these are dismissed by WSP as they *“do not impact on the operation of the SRN.”*

9.2.15. There are some increases in queues at the A449 / Four Ashes/Station Drive junction. These concern the Station Drive arm of the junction but these queues do not impact on the operation of the SRN.

- 3.9 These results appear to indicate an increase in traffic using Station Drive, which has a negative impact on locals. This is contrary to the stated aims, and to the reason that closure of Station Drive was dismissed.

4.0 Connect Specific Responses to WSP TN42

WSP TN42 Paragraph 2.9 – Impact of Right Turn Ban on Other Local Road Users.

2.9 In terms of the impact on other local road users, for example, those visiting or working at the Four Ashes Industrial Estate off Station Road, drivers would be able to access Station Road from the east via the A5/Vicarage Road and from Station Drive via the A449 (via a short diversion up to the new roundabout if travelling from the south). This would result in a diversion of just over 2km or approximately 2 minutes, which in our judgement is not material and likely to result in drivers continuing to use the primary road network.

- 4.1 It seems contradictory to believe that the “short diversion” which is “not material” up to the new A449 roundabout, to U-turn, travel south on the A449 to turn left on to Station Drive is acceptable for “other local road users”, but would actually deter non-local road users and HGVs.
- 4.2 If the U-turning route is genuinely “not material” and results in a preferable journey time from the A449 South to Station Road (east of the rail bridge), then this would logically be available to (and apply to) all vehicles, unless HGV drivers are using HGV specific satellite navigation which includes information about height restrictions.

WSP TN42 Section 3 – Junction Operation

- 4.3 Section 3 of the WSP TN42 concerns peak period operation (capacity analysis) of the A449 / Station Drive junction.

3.5 The results of the modelling undertaken are provided at Annex A to this TN. These show that the junction would operate satisfactorily with the closure of Station Drive. The results of this assessment have not been discussed in detail with either HE or SCC.

3.6 Notwithstanding the above, given the level of inconvenience that would result to road users, it is considered that the assessment of the effects of the closure of Station Drive should not simply concern junction operation. It is considered that any displaced road users may seek to take alternative routes, using less suitable sections of the highway network. This concern has also been raised by SCC during informal discussions since the Issue Specific Hearing. This matter is considered in the Section 4.

- 4.4 WSP conclude that the junction would operate within capacity. We have no reason to dispute this conclusion.

WSP TN42 Paragraph 2.12, 2.13 – Alternative routes for Traffic from the South following closure of Station Drive

- 2.12 The closure of Station Drive / Road at the rail bridge will result in the diversion of employee traffic accessing the Four Ashes Industrial Estate as this will no longer be accessible from the A449. Figure TN42-1 shows the routes which could be used to commute to the estate if Station Road is closed at the rail bridge. The diversion for traffic to the north, east and west is most likely going to be onto the A5 and then south onto Vicarage Road which is an appropriate route for traffic to use. In order to avoid long diversions, it is considered that traffic from the south is likely to use inappropriate routes through the local villages to the south of the estate including Featherstone, Shareshill and Calf Heath.
- 2.13 Since the Issue Specific Hearing, following questions raised by Interested Parties and the examining Authority, this matter has been discussed once again with the relevant Highway Authorities. In the case of SCC, the applicant understands that the local highway authority would not support the full closure of Station Drive to the west of the bridge, given that in their view, it would be likely to increase the use of inappropriate routes (rat-running through lanes nearby).

- 4.5 WSP TN42 goes on to consider alternative routing for the Closure of Station Drive mitigation, but does not consider it for the right turn ban mitigation.

WSP TN42 Section 4 – Diversion Routes

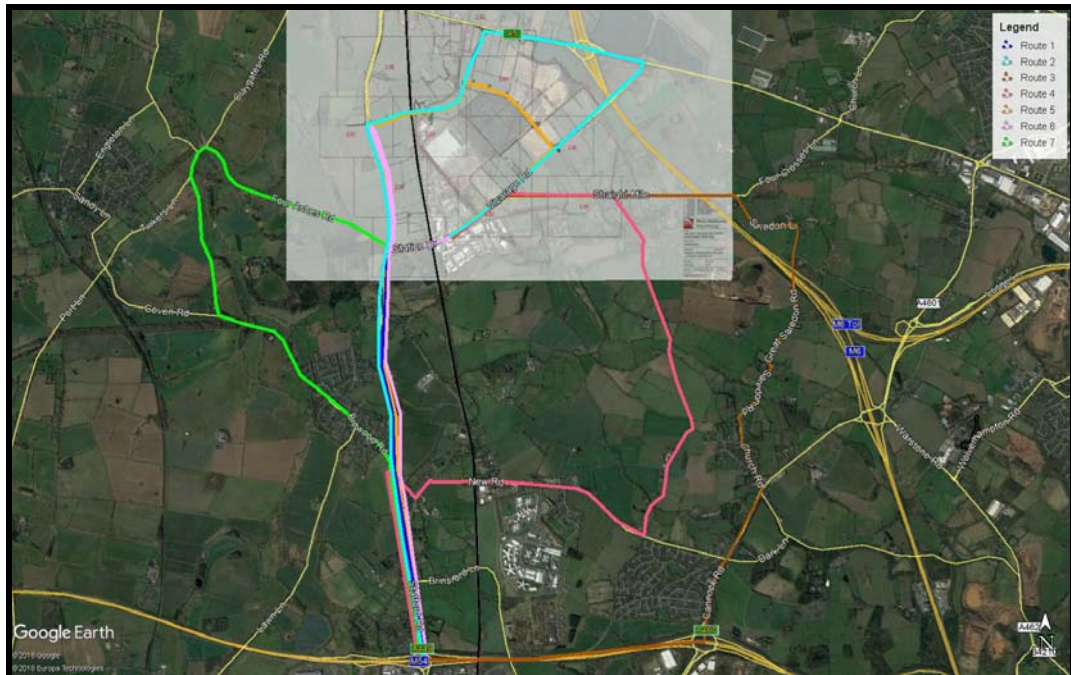
- 4.6 Section 4 of the WSP TN42 relates to the potential diversion routes for traffic travelling between the A449 south of Station Drive, to Station Road east of the rail bridge.
- 4.7 Firstly, if the applicant's proposed right turn ban was successful in achieving their stated aims, then the same alternative routes would be equally attractive in either scenario, and so to consider them detrimental relative to the Station Road closure and ignore them in relation to the right turn ban is an incomplete, unbalanced approach.
- 4.8 In the case where the right turn ban is adopted, there is the potential for traffic travelling along the A449 from the south to turn left at Coven, travel along Brewood Road, Somerford Lane, Tinkers Lane and Four Ashes Road such that they can travel ahead, across the A449, on to Station Drive. This is an alternative to travelling past the destination, and doubling back, which can be a psychological deterrent and inconvenience to drivers.
- 4.9 Secondly, in their assessment of alternative routes, WSP have only compared them based on distance travelled, and have failed to include journey time which is (naturally) a material factor in whether an alternative route provides a time saving for someone travelling in the area on a regular basis. Interestingly, WSP agree that journey time is an important factor at paragraph 4.4 of WSP TN42 *"...those local to the area are likely to still use the routes they perceive to be quicker and shorter..."* (Our emphasis).
- 4.10 Furthermore, WSP have failed to include the route through the WMI development, utilising the road between the A449 / A5 Link Road and Vicarage Lane which, from the plans, appears to be of suitable magnitude to carry traffic (and naturally so, if it is to serve the development).

- 4.11 Taking WSP TN42 Table 1 and assessing the routes for journey time results in the following. Note: journey times established from Google Maps, typical traffic during a morning peak hour. Where routes utilise the development infrastructure, journey times assume (relatively) free flowing conditions as, presumably, the internal development infrastructure has been designed to operate within capacity.

Table 1 – Comparison of Routes to Four Ashes Industrial Estate

Mitigation	Route #	Route Description	Distance from M54 J2	Time from M54 J2
None	1	Existing route via A449 and Station Drive	4.4 km	5 – 7 mins
Station Drive closure	2	Via A449, A5 / A449 Link Road, A5 and Vicarage Lane	10.7 km	10 – 16 minutes
Station Drive closure	3	Via M54, A460, Saredon Road and Straight Mile	10.4 km	14 – 20 minutes
Station Drive closure	4	Via A449, Old Stafford Road, New Road, Featherstone Lane, Latherford Lane and Straight Mile	9.6 km	16 minutes
Station Drive closure	5	Via A449, A5 / A449 Link Road, site road to Vicarage Lane, Vicarage Lane.	8.5 km	7 – 13 minutes
Right Turn Ban	6	North on A449, U-turn at WMI Junction, left to Station Drive.	6.8 km	6 – 12 minutes
Right Turn Ban	7	Via Coven, Brewood Road, Somerford Lane, Tinkers Lane, Four Ashes Lane, Station Drive.	8.3 km	12 minutes

Figure 1 - Routes Considered



- 4.12 In relation to the right turn ban, the 'U-turn' option (Route 6) carries not only the psychological disadvantage of passing your desired destination and having to double back, but low journey time reliability, increasing the attractiveness of the route via Coven (Route 7). On the other hand, narrow country lanes can also have low journey time reliability owing to width restrictions and the potential for slow moving agricultural vehicles.
- 4.13 In relation to the Station Drive closure scenario, journey times and distances indicate that the most desirable route is via the A449, A449/A5 Link Road, internal development road and Vicarage Lane (Route 5).
- 4.14 Comparing Route 2 (via the A449 / A5 Link Road, A5, and Vicarage Road) and Route 4 (via Featherstone Lane) indicates that Route 4 is 1 km shorter, but that Route 2 is to be between zero and six minutes quicker during peak times, and six minutes quicker during off-peak times.
- 4.15 On this basis, it appears that the development infrastructure has the capability of accommodating a suitable and desirable route for traffic which is affected by the closure of Station Road at the rail bridge, without any higher likelihood of pushing traffic on to narrower cross-country routes compared with the proposed right turn ban mitigation.
- 4.16 NewRiver Retail therefore puts forward this alternative option of closing Station Drive as its preference over banning the right turn movement. However, NewRiver's ideal outcome is to have a mitigation scheme with no adverse effects on the public house. Therefore, this preference is put forward without prejudice to NewRiver's rights to claim against any damage caused by the mitigation proposals. It is simply the case that NewRiver considers the option of closing Station Drive at the railway bridge to be less damaging than banning the right turn.

5.0 Additional Benefits

- 5.1 A substantial benefit of NewRiver's preferred mitigation is for pedestrians and cycles who utilise this route, who will benefit from significantly reduced vehicles along Station Drive between the A449 and the rail bridge. This will likely be a safety and amenity benefit, contributing towards modal shift towards walking and cycling, one of the key aims of national and local policy.

6.0 Conclusions

- 6.1 NewRiver's preferred mitigation on Station Drive, i.e. the closure of Station Drive to vehicles at the rail bridge, appears to be preferable in various respects to the applicant's proposed mitigation of banning right turning vehicle from the A449 in to Station Drive.
- 6.2 Station Drive closure meets all of the applicant's stated aims, and does so more effectively than the applicant's proposed mitigation.
- 6.3 In relation to the original reason for dismissal of Station Drive closure, that Station Drive closure may not find local favour, is incorrect, and it seems likely that the proposed right turn ban would meet with stronger local objection.
- 6.4 The applicant's latest analysis does not hold water, as Station Drive closure results in a lower (or, at worst, comparable) likelihood of drivers seeking to use alternative routes via narrow lanes, particularly if the applicant accepts through traffic on the development road between the A449 / A5 Link Road and Vicarage Road.
- 6.5 Overall, the closure of Station Drive at the rail bridge (to vehicles) and maintaining access for pedestrians and cycles, is a better proposal than the banning of right turning vehicles at the A449 / Station Drive junction.
- 6.6 We therefore suggest to the Examining Authority that the herein suggested closure of Station Drive at the rail bridge is taken forward.