

### **Further informative information for Session 10 Transport**

With reference to the application for 240 homes on land West of Cromwell Lane (site H2:8), We have previously commented and objected to this site for reasons of failure to comply with the relevant NPPF and guidelines and also in terms of its sustainability particularly in regards to traffic and infrastructure constraints. Having now had time to consider the Traffic Assessment carried out by Phil Jones Associates on behalf of UK Land and Heyford Developments we would like to comment further on the assessment itself

- Scoping: As we understand it, the Consultant and CCC held a scoping meeting on June 9<sup>th</sup> 2016 to set the parameters of the assessment. This meeting had a number of key points for consideration including;
  - CCC's desire to reduce vehicle speeding on Cromwell Lane
  - The Capacity of Cromwell Lane and the Junctions adjoining it
  - On-street parking relating to Tile Hill Station
- **Capacity**; we will refer vehicle speed later as it is associated with other issues. As far as the capacity of Cromwell Lane and associated junctions is concerned, the traffic counts were taken for one day on Thursday 28<sup>th</sup> April as follows; from 7.00am -10.00am and 16.00-19.00. In the same month CCC carried out a traffic survey for one working week after a residents petition was presented in 2015 over concerns about traffic and on-street parking. This recorded peak traffic at the following times; 7.00 – 9.00am & 16.00 – 18.00 pm. The cameras were left in place and this also recorded HGV traffic flows/weekday. The traffic flow rates for the CCC survey were higher as they were more concentrated on the actual peak.
- Although the brief was to assess junctions off Cromwell Lane we believe this gives an incomplete picture as it does not include the Station Avenue/Torrington Ave junction and Tile Hill Village four arm traffic lights. These all form part of the same through route past the proposed development towards Westwood Heath, University of Warwick and the A46, only the name changes . In particular, Torrington Av. and Duggins Lane are only some 60m apart forming an offset cross roads which means that the Torrington junction effects the Duggins Lane traffic at peak times when cars waiting to turn right block that junction. With respect to the Tile Hill Lane junction which was also not assessed by the consultant we would draw attention to the following statement from the traffic flow comparison published by CCC in July 2016 in response to the above resident requested traffic survey; 'The most significant output highlighted by the model (CASM) in this area was that some additional pressure is anticipated to occur at the junction of Tile Hill Lane and Station Avenue'. (Bullet point 6 on page 1). It seems to us that before any new development is considered a full assessment of the total area affected needs to be carried out and not just on Cromwell Lane itself.
- The actual assessment using PICADY (priority intersection capacity and delay) software was carried out with projected traffic for the development added in. The results of this showed that two of the key junctions, **Charter Av. and Westwood Heath road** are already at capacity as at 2016 without any development. When the development is added for now and 5years on, these two junctions are well above design levels. Both Westwood Heath rd. and Charter Av. are over capacity in terms of RFC (ratio of flow to capacity) and Delay (maximum value of average delay of arriving vehicles) for both am and pm peaks. The summary on page 26 of the report does not seem to tally with the junction overall assessment for Cromwell Lane/Charter whereas the one for Westwood Heath does. At the Examination Session on Transport which took place on 18<sup>th</sup> October, CCC officers agreed that these junctions were

indeed over capacity. These reports both show conclusively that the area is heavily congested and that two junctions are already over capacity. For the consultant to then conclude as he does that 'the addition of the development would not have a severe impact on the operation of the junction.' is to imply that it would be ok to add further traffic at already overloaded junctions. It needs to be remembered that there is already an approved development for 24 apartments at 125 Station Avenue which will add a further 50 cars to local roads and a further development in progress for 6 apartments and 12 cars. By way of practical evidence, on Thursday 21<sup>st</sup> October residents counted 50 cars in a 200 yard queue at the Charter Avenue/Cromwell junction at 5.45pm which is towards the end of the afternoon peak.

- **Speed of Traffic;** Under heading 4 of the consultant's report the design of the north and south accesses incorporates centre refuges (reducing the carriageways to 3m) which together with hatching from the fly over on Cromwell lane and other measures is aimed at calming traffic. We applaud any measures of this type given the speeds recorded in the Council Traffic survey but because of the number of HGVs using the area this will not be practical and will make Cromwell Lane more dangerous for other road users, particularly cyclists who share the lane in this area. The addition of these further two junctions will increase the total to 11 from Tile Hill village lights to Westwood Heath Rd and mean 5 junctions from Charter Avenue to Westwood Heath Rd, a distance of about 400 metres. It also has to be remembered as Cromwell Lane is a residential road meaning that all the traffic from these houses feed directly onto it
- As previously mentioned above, the CCC survey also counted the number of HGV vehicles using these minor roads. This showed that for example Torrington Avenue sees 174 HGVs going into and out of the junction/working day, Cromwell Lane to the flyover 75, Station Avenue 69 and Banner Lane (north of the Tile Hill Lane junction) 91. It has to be remembered that these are minor and in some cases village/rural roads not designed for these very large vehicles (many articulated and multi – axle) which cannot negotiate these minor junctions without blocking both carriageways. They also of course create noise and pollution to a mainly residential area and some are involved in 24hour operations. This has occurred because logistics facilities are allowed to operate in a location which does not have any direct access to primary routes
- **On street parking related to Tile Hill Station** As far as we can see the consultant has carried out no work on this part of the Council's brief apart from to comment that the Penruddock residents parking scheme was working well. We have previously commented on this issue but to make clear what has not been mentioned in this assessment; we accept that some people from any proposed development can walk to THL station as some residents already do. However, this is probably the only advantage associated with this station. What has not been commented on is the fact that the station has been transformed by the operator into a 'hub' which attracts commuters from a wide area well outside the city boundary. In paragraph 3.3.6 the report indicates there are 145 plus 16 disabled spaces at the station. There are in fact 332 upgraded from 90 in 2010/11. These are of course all full from 8.00am onwards every working day until around 4.00pm when early commuters start to leave. Any further increase in parking spaces will merely repeat the situation of 2010, extra spaces immediately being filled by more commuters and more traffic into and out of the area. In no way can this facility be described as in 3.3.6 of the report as a park and ride during the working week. This leads to a massive problem for local residents and businesses caused by on-street parking. The new local plan on page 127 lists the occurrences of inappropriate on-street parking which can;

Block access routes for emergency, refuse and delivery vehicles  
Block footways preventing access for pedestrians  
Impact negatively on the street scene  
Reduce visibility for all users at junctions causing safety issues

All of these situations occur regularly in this area around the station. The west midland strategic travel policy seems to be aimed at attracting people from the major rail stations to small suburban stations like Tile Hill without making any provision for the issues which will inevitably ensue. Until the operator manages this car park by use of number plate recognition or similar technology and sets charges for all day and multi day parking in line with adjacent facilities (Coventry, Birmingham International etc. at typically £12/day) this situation will not improve and the assertion in this report that the station has a completely positive impact on the area is just not true.

### **Conclusions**

- The traffic situation surrounding Cromwell Lane is already unsustainable as both the Developer's and Council surveys confirm. The supplementary report from the Developer which will use CASM (Coventry Area Strategic Model) to assess the growth of traffic in the area of the development is for the plan period until 2031 but the Developer's own modelling for only 5 future years ahead already shows two key junctions as well over capacity and the Duggins Lane junction close or over capacity for some directions of junction flow and well over capacity for the 5 years with and without the development. It should be noted that at the Transport Session of the Local Plan Examination (currently in progress) City Council Officers confirmed that for the purpose of producing a 'robust' assessment of traffic increases for the plan period, the 'worst case' output from the CASM model would be used which in table 10.1 of the new local plan (Demand /trip rate changes – page 123)) is shown as 42% increase in the am peak and 37% in the pm peak. Whichever figures are used, they will not show a decrease at already over capacity junctions!
- Any proposed work to improve these junctions will have to factor in the type as well as the volume of traffic using these junctions unless HGV traffic is to be excluded from the minor roads in this area. Any modification will have to include sufficient space for these very large vehicles to turn without obstructing the rest of the carriageway
- The Council survey of traffic should have been done before the site was considered to be 'sustainable' for development but was only carried because of pressure from local residents. A site being considered for removal from green belt should always be subject to full traffic survey before any decision is taken and not rely on a computer modelling tool and certainly not a Developer's assessment
- In the case of Cromwell Lane the Council Traffic management/planning team have not even as yet responded to the consultation request of the outline planning application (as at 20/10/16)
- Pedestrian safety and the issues of the train services from Tile Hill have been covered elsewhere in our submissions but we are attaching comments from a local

resident who catches the train every day from Tile Hill to further reinforce the very real issues surrounding this facility and access to it. There is only a footpath on the eastern side of Cromwell Lane and access to bus services going south to Westwood Heath Rd. and on to the Business Park, university etc. means crossing Cromwell Lane with all the hazards described by Mr. Rippington. We are also attaching further photographs of the situation on 25<sup>th</sup> October when there were 11 vehicles parked on the east side of Cromwell Lane between Cromwell Cottage at the foot of the flyover south to the junction of Charter Avenue, a distance of about 80yards. This caused extremely dangerous traffic/pedestrian conditions and occurred from about 9.00 am until late afternoon.

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