PMA Highways Appraisal, October 2016 - Response

The following memo responds to the Paul Mews Associates report: Syon Park Garden Centre – Church Street Temporary Closure: Highways Appraisal, October 2016.

1.4 Introduction

“This Highways Appraisal report sets out a review of the background to the scheme, the data on which the Council’s decision was based on and the monitoring the Council has carried out but also the effect the scheme has had on the garden centre in terms of traffic, visits and trade. In addition, it sets out a number of options that the Council should have considered before implementing a full ban of traffic on Church Street and other options that the Garden Centre could consider to ameliorate the impact.”

Response
It should be noted that the trial only includes a point closure which has been introduced to understand the impacts of preventing through traffic from travelling the length of Park Road and Church Street between Twickenham Road and Manor House Way. Pedestrians and cyclists are able to pass through the closure while vehicular access to any point on Church Street remains possible from either end.

2.5 Background

“Figure 2 shows routings taken by suggested ‘rat-running’ traffic and Syon park traffic before and after the implementation of the Church Street closure. This has resulted in increased journeys for ‘rat-running’ traffic by 640m per vehicle trip and Syon Park traffic by only around 1.3km per vehicle trip.”

Response
Figure 2 refers to rat running trips from the north and access to Syon Park from the south only, and shows a route from the Twickenham Road / Park Rd junction to the South St / Richmond Rd junction via Church Street measured at 1,240m.

The alternative route between these two junctions using Twickenham Road is shown at either 1,300 or 1,330 (depending on routing, either via North Street and
Upper Square, or South Street; it is unclear how this equates to an increase in journey length for ‘rat-running’ traffic of 640m per vehicle trip. Using the figures shown it should be closer to a less significant 60-90m per trip.

Furthermore, the routings (and associated distances) shown are not accurately representative of all rat-running routes as they suggest that all through traffic will be travelling between the Twickenham Road / Park Road and South Street / Richmond Road junctions.

It is likely that some through traffic used the pre-closure route to return to Twickenham Road via the South Street mini-roundabout. Some traffic may also have had a destination on streets such as North Street (this would be considered as a through trip on Park Road / Church Street but an access trip within the study area). These routes would see significantly smaller increases journey lengths than the 640m [sic] and 1300m quoted, which could be considered as a worst case.

The tables below show this wider range of origin-destination pairs and the change in journey lengths possible as a result of the trial closure.

The first table shows a comparable distance for trips using either route between Twickenham Road / Park Rd to and South St / Richmond Rd, while those travelling between the Twickenham Road / Park Rd and South St / Twickenham Rd junctions would see a reduction in route length of over 600m.

<table>
<thead>
<tr>
<th>Through Traffic Route</th>
<th>Via Church St</th>
<th>Via Twickenham Rd</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Twickenham Road j/w Park Rd to South St j/w Richmond Rd</td>
<td>1,360m</td>
<td>1,370m</td>
<td>+10m</td>
</tr>
<tr>
<td>Twickenham Road j/w Park Rd to South St j/w Twickenham Rd</td>
<td>1,640m</td>
<td>1,030m</td>
<td>-610m</td>
</tr>
</tbody>
</table>

As shown below, the 1.3km increase for access to Syon Park (to/from the south - access from the north is unaffected) presented in the report is a worst case and is significantly reduced if the origin is the South St j/w Twickenham Rd.

<table>
<thead>
<tr>
<th>Syon Park Entrance Access Route</th>
<th>Via Church St</th>
<th>Via Twickenham Rd</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Syon Park Entrance to South St j/w Richmond Rd</td>
<td>730m</td>
<td>2,020m</td>
<td>+1,290m</td>
</tr>
<tr>
<td>Syon Park Entrance to South St j/w Twickenham Rd</td>
<td>1,010m</td>
<td>1,680m</td>
<td>+670m</td>
</tr>
</tbody>
</table>

2.8 “As has been noted in correspondence with representatives of Syon House, the consultation process was restricted to a narrow area and excluded households who stand to lose by restricted access and increased levels of congestion and pollution on adjacent roads. In addition, there was no consultation with local businesses or employers. This includes the West Middlesex Hospital, London Ambulance Service, Syon Park, Wyevale, and associated businesses, as well as the local small businesses on South Street and St John’s Road. West Middlesex Hospital, Wyevale and the Hounslow Chamber of Commerce have all since provided comments to the Council.”
Response These issues were considered by the Local Government Ombudsman, who published the following summary in September 2016 personal details redacted):

“There is fault in the way the Council consulted with the local ambulance trust on an experimental road closure... However the trust is aware of the closure and is monitoring the impact on its responses. I consider this to be a suitable remedy. The Council is not at fault in the way it consulted with road users on the proposed experimental road closure. The purpose of the experimental road closure is to provide clear evidence of the impact a permanent closure of the road would have. (The complainant) commented on the proposals and can comment on the closure during the trial period.

The traffic management order (TMO) process allows experimental restrictions to be put in place as a means of measuring the impact on all road users, residents and businesses. In this way, all local businesses have been given an opportunity to comment during the trial so that their thoughts can be considered by the Council before a final decision is made.”

3.2 Traffic Flows

“During the AM peak period, two-way flows on Church Street between November 2014 and May 2016 fell by 344 vehicles. On the assumption that ‘rat-running’ traffic was the main concern of the Council in closing the through route via Church Street, the AM peak hour reduction in trips on Park Road (north of the Syon Park access), in absolute terms, should be similar to the reduction experienced on Church Street. In fact, the reduction in trips on Park Road (north of the Syon Park access) during the peak hour was only 121 vehicles. This suggests that 223 vehicle trips on Church Road (sic) were not rat running but were legitimately accessing properties and businesses in the area, including the garden centre. A similar effect was noticed during the PM peak hour with 197 vehicle trips on Church Road (sic) not rat-running but accessing properties and businesses in the area, including the garden centre.”

Response It is not possible to draw the conclusion that the reduction in flows on Park Road (north of the Syon Park access) should, in absolute terms, be similar to the reduction experienced on Church Street due to the change in available routes in relation to key destinations following the implementation of the trial closure.

For example, southbound traffic on Park Road / Church Street will have originally consisted of through and access traffic (further split between entry and exit traffic) before the closure. Following the closure the southbound access traffic will remain but the southbound through traffic will have re-routed away from this Park Road and Church Street. However some access traffic that originally entered Syon Park from the south will have been re-routed via Twickenham Road and have entered from the north. Such changes mean it is not possible to conclude that the difference between the bi-directional flows enables the differentiation between through and access traffic.

All that can be concluded from the am-peak datasets collected during the trial is that a maximum total of 270 northbound and southbound vehicles passed the Park Road monitoring point and similar a maximum of 110 vehicles did the same
on Church Street. Assuming that no traffic has attempted to make a through trip and had to turn round after finding the closure in place, this could be considered to be legitimate access traffic but it is not possible to disaggregate this access traffic to ascertain if it would originally have come from the north or south before the closure was trialled.

3.3 “With the Church Road (sic) closure in place, the alternative routes would be via either North Street or South Street. During the AM peak hour, combined flows on North Street and South Street increased by 12 vehicles. This does not account for the displaced 344 vehicles from Church Street. A similar effect was noticed during the PM peak hour with the increase in flows on North Street and South Street of 127 vehicles not accounting for the 338 displaced trips from Church Street.”

Response Much of the subsequent commentary and analysis in the note is based on the same premise described in item 3.2 and is therefore equally unsupportable.

3.4 “Ultimately, the Council’s perceived rat-running traffic would join Twickenham Road and as such even if different alternative routes were used, it would be expected that flows on Twickenham Road would increase in line with displaced flows from Church Street. Flows did increase but only by 47 and 64 in the AM and PM peak hours respectively. Again these increases do not reflect displaced flows from Church Street. While it is accepted that there is likely to be some seasonal variation in traffic flows between November and May, it would appear that the data presented does not account for all displaced traffic.”

Response In addition to providing a similar response to items 3.2 and 3.3, we note that it should not be expected that all rat-running traffic would re-route via Twickenham Road as this is an over-simplification that fails to fully consider the following factors:

- Some rat-running traffic will have sought alternative routes other than using Twickenham Road
- Some existing Twickenham Road traffic will have sought alternative routes if traffic levels changed on Twickenham Road itself (to some extent junction capacities and congestion along the link may have the effect of self-regulating traffic flows)
- There is potential for some users to change mode (i.e. from vehicular modes to more sustainable modes such as walking and cycling)
- Some trips are likely to be re-timed
- There is likely to be some seasonal variation (which is noted in the PMA report)

In combination these factors are likely to have meant that the reassignment of through traffic from Park Road / Church Street has not seen an absolute corresponding change in the number of trips recorded on Twickenham Road. The PMA analysis supports this statement.

3.6 “It is clear from the hourly analysis that ‘all traffic’ flows peak between 08:00 and 09:00 and then again between 17:00 and 18:00 with the greatest increase during
the morning period in the northbound direction and southbound during the evening peak. This does tend to suggest that Church Street is used a short cut through Isleworth.”

Response Noted. Concerns received from local residents at the levels of through traffic, particularly during peak periods, were the key reason for the trial closure.

3.7-3.12 Heavy Goods Vehicles

“Reasons cited for the trial closure of Church Street included reported high numbers of heavy goods vehicles. Table 2 above shows that indeed there seems to be a higher level of HGV on Church Road than would be expected.

…”

Response The report finds that HGV flows are higher than expected and suggests the modal split is probably noticeable to local residents.

Perhaps more importantly the report picks up that HGV flows are higher on Church Street than they are on Park Road. It suggests that “This could be accounted by HGVs servicing Syon Park approaching and leaving via Church Street...”. Church Street is a narrow street for much of its length when compared Twickenham Road and is therefore not considered to be suitable for high flows of non-essential heavy goods traffic.

3.18 Road Safety

“Figure 3 shows an extract from the CrashMap website indicating 1 serious and 2 slight accidents occurred on Church Street between 2011 and 2015. This low level of accidents does not suggest that there is an accident problem.”

Response Noted. Given the layout and width of the road, vehicle volumes and speeds are also key factors in assessing Church Street from a traffic point of view.

3.20 Journey Times

“The key point here is that journey times are acknowledged as the yardstick for assessing the impact on driver’s journeys yet there is no data available within the report relating to drivers’ journey times. A series of journey time surveys measuring drivers’ journeys during peak hours before and after the closure would have been a useful indicator of the impact of the closure on Twickenham Road / South Street. It is reported that local residents who previously used Church Street have experienced large increases in their journey times by up to 30 minutes yet there is no way this can be verified.”

Response The TfL-supplied iBus outputs provide an extensive, cost-effective and accurate dataset which captures vehicle journey times through the network for a range of origin-destination pairs, while recording in car journey time data is a costly exercise given the amount of runs likely to be collected.
The Highways Appraisal report states that the 30-minute journey time increase cannot be verified so its inclusion is less useful than analysis of the data supplied by Transport for London.

3.24 “It is suggested however that bus journey times are not the most appropriate method of demonstrating the impact of the closure of Church Street on traffic on other local roads as bus data does not represent the true picture as regards general traffic since buses have the advantage of bus lanes to reduce delay at junctions and along the route.”

Response It should be noted that buses benefit from a single section of southbound bus lane from Mandeville Road to Linkfield Road which falls within the data captured by iBus. It operates Monday-Friday, 4-7pm. The northbound bus lane which starts north of Teesdale Gardens (operating: Monday-Friday, 7-10am & 4-7pm) is less likely to have an impact on bus journey times when comparing pre- and during trial data due to its location. The bus lanes cover approximately 100 metres (southbound,) and 90 metres (northbound, between Teesdale Gardens and Park Road) of the total 1km length of Twickenham Road between Park Road and South Street. Since both sections of bus lane were in place prior to the closure, the iBus data gives robust data as to the impact on journey times for general motor traffic of the trial.

4.1 Garden Centre Impact

“As set out in information supplied by Wyevale Garden Centres Ltd, the effect of the closure of Church Street on footfall at the garden centre has been significant. Wyevale Garden Centres Ltd has reported that;

We continuously monitor the number of people who visit our centres and our most recent data confirms that, since the implementation of the trial road closure last December, there has been an 18.5% drop in the number of people visiting our Syon Park Centre. Our loyalty scheme shows that the drop in customers is from the southern area of Syon Park and is therefore directly affected by the road closure. In stark contrast, visitor numbers at our other nearby Centres have remained consistent with previous years.

Furthermore, after years of steady and consistent growth, sales at the Centre have fallen considerably, which is again in stark contrast to our other local Centres where growth is continuing along with trends of previous years. It is clear that the Church Street road closure is having a major impact on the ability of visitors, many of whom are local residents, to access the Garden Centre.”

Response It is unclear if any other factors have affected the number and distribution of trips attracted to the garden centre. It should however be noted that given that the majority of visitor trips to the garden centre occur outside of peak periods when congestion is lower, it is felt that it is unlikely that the changes associated with the Church Street trial would account for all of the variations in demand.
4.5 “The analysis suggests that a total of 24% or 14,111 Garden Club member visits during 2015 would have approached from the south via Chertsey Road and could have continued to the garden centre via Church Street. The drop in the number of Garden Club members visiting the garden centre since the closure of Church Street has been assessed at 18.5%. It is likely that the majority of this reduction in trade relates to the 24% of customers that travel to the site from the south. Taking the wider view of all customers (Garden Club members and non-members) for the year August 2015 to August 2016, there has been an 11.6% drop in footfall accompanied by a 14.3% reduction in sales. Over the same period the company’s garden centre at Osterley has seen no general change in footfall or sales.”

There is no evidence to support the assumption that the majority of the 18.5% reduction in trade relates to the 24% of customers that travel to the site from the south.

It is also a weak assumption to conclude that all trips from Chertsey Road would have chosen to use Church Street when made from the south e.g. some of those coming from the SW may have previously chosen to use Twickenham Road (rather than Richmond Road) and then continued north and entered via Park Road.

The analysis also implies that all trips are being made by motorised modes whereas some of the more local trips will have been made by more sustainable modes which are unaffected by the filtered permeability on Church Street.

It would be helpful if a breakdown of the visitor split could be provided for 2016 to ascertain the validity of many of these assumptions but in its absence much of the subsequent calculation and commentary in the Highways Appraisal report is based on these assumptions and cannot therefore be relied upon.

4.7-4.13 “The analysis suggests that a total of 110 staff trips per day approach from the south via Chertsey Road and would have continued to the garden centre via Church Street. Assuming a working year of 235 days, this would equate to an annual total of 25,850 trips.

In total this amounts to 39,961 Garden Club and staff trips per year that would have to travel to the garden centre via the longer alternative route rather than the shorter route via Church Street. As stated above, the alternative route adds 1.3km to each journey, such that on an annual basis the closure of Church Street could leading to unnecessary additional journey distances of almost 52,000km. However, as has been reported above there has been an 18.5% reduction in Garden Club member visits since the ban came in to force meaning that 18.5% of former Garden Club visitors are choosing to go to other garden centres.

This additional distance will have wasted time and increased pollution implications. In a traffic free situation at a speed of 25mph the additional 1.3km would add around 2 minutes to each journey. On an annual basis for Garden Club members and staff this amounts to 1,332 hours, or over 55 days of wasted time.

…”
Response  The calculations again assume that all trips are being made by car but fail to take account of the alleged reduction in visitor numbers from the south. The stated 52,000km increase in journey distance is therefore unsupportable (see also response to 2.5 re: additional distances), as are the subsequent calculations relating to journey times and pollution.

6.1-6.5 **Suggested Alternative Solutions**

“As demonstrated in the preceding chapters, concerns over the number of HGVs which used Church Street prior to the closure appear to be borne out.

...”

Response  The final chapter fails to suggest a clear solution that will reduce traffic flows as effectively as the trial closure.

It also chooses to focus on reducing the number of HGVs using Church Street. As stated in the report the percentage of total flow is 3.0% and while a reduction would most likely be welcomed by residents, as a mode it only accounts for a very small proportion of total traffic.

6.6-6.7  “Within the Council’s report, it is proposed that wider area improvement could be made as detailed in the extract below;

‘As part of the original recommendation to progress a trial closure made by the Isleworth & Brentford Area Forum in September 2015, councillors also requested that further feasibility work be undertaken on potential measures that may improve traffic flow along Twickenham Road, with a focus on the section between the borough boundary with Richmond and the South Street junction.

...’

It is suggested that these wider area improvements should be pursued as any improvement in journey times and traffic management on the wider main road network would reduce the incentive to use the Church Street shortcut, especially once additional more stringent speed control measures are introduced as suggested.”

Response  The identified changes to the junctions further south on Twickenham Road will potentially reduce journey times in this area but by the time drivers reach a decision point at the South Street junction they will still most likely choose the Church Street route if they expect Twickenham Road to be slower. Through traffic flows will therefore be closer to pre-closure levels than implementation of a permanent feature would dictate.

PMA Highways Appraisal, February 2017 - Response

The following section responds to the Paul Mews Associates report: Syon Park Garden Centre – Church Street Temporary Closure: Highways Appraisal, February 2017. The revised report focuses on providing
commentary relating to the November 2016 data and in turn the responses below address these comments.

Note: The referenced responses below relate to the revised numbering on the February 2017 report while the original responses above relate to those of the October 2016 report.

3.2-3.4 Traffic Flows

“During the AM peak period, two-way flows on Church Street between November 2014 and May 2016 fell by 344 vehicles. A similar level of reduction has been maintained to November 2016 (345 reduction).

On the assumption that ‘rat-running’ traffic was the main concern of the Council in closing the through route via Church Street, the AM peak hour reduction in trips on Park Road (north of the Syon Park access), in absolute terms, should be similar to the reduction experienced on Church Street.

In fact, the reduction in trips on Park Road (north of the Syon Park access) between November 2014 and May / June 2016 during the peak hour was only 121 vehicles. This suggests that 223 vehicle trips on Church Street were not rat-running but were legitimately accessing properties and businesses in the area, including the garden centre.”

Response The updated analysis uses the same premise as stated in the original report, as given in the original response it is not possible to draw the conclusions that the reduction in flows on Park Road (north of the Syon Park access) should, in absolute terms, be similar to the reduction experienced on Church Street for a range of given reasons.

3.5 “By November 2016 two way peak AM flows on Park Road had risen to a level approaching flows seen in November 2014 and suggests that 304 of the original 344 vehicle trips on Church Street were not rat-running but were legitimately accessing properties and businesses in the area, including the garden centre. A similar effect was noticed during the PM peak hour in May / June 2016 with 197 vehicle trips on Church Street not rat-running but accessing properties and businesses in the area, including the garden centre, rising to 242 in November 2016. In summary, these results suggest that the rat-running problems cited by the Council were not a great as they had suggested.”

Response Similarly, the updated analysis and commentary for the 2016 is unsupportable as the over-simplified assumptions are not robust.
3.6-3.7  “With the Church Street closure in place, the alternative routes would be via either North Street or South Street. During the AM peak hour, combined flows on North Street and South Street increased by 12 vehicles. This did not account for the displaced 344 vehicles from Church Street. By November 2016 AM peak hour combined flows on North Street and South Street had fallen by 160.

A similar effect was noticed during the PM peak hour with the increase in flows on North Street and South Street between November 2014 and May / June 2016 of 127 vehicles not accounting for the 338 displaced trips from Church Street. By November 2016 the increase in flows was just 29. These recent changes suggest that former Church Street flows and other flows are taking alternatives routes to their destinations, avoiding Isleworth completely.”

Response  The survey results confirm that the closure of Church Street to through traffic has not had a negative impact on traffic flows using North Street and South Street.

3.8-3.10  “Ultimately, the Council’s perceived rat-running traffic would join Twickenham Road and as such even if different alternative routes were used, it would be expected that flows on Twickenham Road would increase in line with displaced flows from Church Street. Flows on Twickenham Road have indeed increased by 47 and 64 in the AM and PM peak hours respectively between November 2014 and May / June 2016. By November 2016 AM and PM flows had increased further still at levels 87 and 47 higher respectively than in November 2014. While these increases do not reflect total displaced flows from Church Street they are causing other problems for garden centre access.

This is due to the fact that Twickenham Road is now the only access to the garden centre and as such increased flows on Twickenham Road impact on garden centre business due to the constant delays and slow moving / stationary traffic. This prevents customers and staff accessing and egressing Syon Lane due to traffic queuing on Twickenham Road.

It is suggested that increases in flows on Twickenham Road aren’t greater than the ATC survey show due to the fact that the road / local junctions are saturated with traffic and don’t have the capacity to process any more traffic per hour. As a result, peak hours and delays have been spread, delaying people for longer into the evening. Site staff have reported sitting in queuing traffic on Park Road for long periods during the afternoon / evening period waiting to access Twickenham Road.”

Response  As previously highlighted, the relatively small change in flows on Twickenham Road suggests that some of the through traffic originally using Twickenham Road has been displaced to accommodate local access traffic.

It is important to note that the iBus journey time data shows that delays along Twickenham Road are less significant outside of peak hours. As the garden centre is only open 9am-6pm and the busiest times are apparently between 10am-4pm (based on Google’s “Popular Times”) it seems that the impact of the peak hour changes is perhaps overstated when considered from a customer’s perspective.
3.11  “In summary, it appears that the ongoing closure of Church Street is causing legitimate traffic heading to / from Park Road to have to take even wider alternative routing to reach their destination than had been expected. This could lead to greater distances having to be travelled and increased journey times / pollution. Increased flows on Twickenham Road are also causing delays in traffic being able to access / egress Park Road. It is clear that a large proportion of traffic than had been using Church Street was not rat-running.

Response  The data and subsequent analysis fails to robustly support the hypothesis that legitimate traffic heading to / from Park Road will need to use wider alternative routing than Twickenham Road.

The analysis also fails to clearly determine the proportions of traffic that had been using Church Street for access or rat-running.

Ultimately, as intended, the Council has maintained access to Syon Park (including the Wyevale Garden Centre) for all modes and eliminated rat-running on both Park Street and Church Road.