

MIRA – Extra Room Self Storage

Deliverability of a Signalised Drayton Lane Junction

Technical Note

June 2026

Executive Summary

The existing access is lawful and established

- Drayton Lane currently accommodates lawful access, including HGV movements associated with established local businesses and agricultural operations. This includes access serving approximately 2,000 household and business self-storage customers, together with the arable farming operations at Drayton Grange Farm.

The proposed LILO arrangement would materially interfere with that access

- In August 2022 MIRA proposed traffic signals at both the Woodford Lane and Drayton Lane junctions with the A5 but National Highways objected to this on the basis that MIRA's modelling showed that the signals would result in queuing on the A5.
- MIRA subsequently proposed a left-in / left-out ("LILO") arrangement at the A5 / Drayton Lane junction. This would materially interfere with existing lawful access arrangements relied upon by Extra Room Self Storage ("ERSS"), Drayton Grange Farm and other established local users.
- The proposed LILO arrangement would result in many traffic movements, including HGV movements associated with ERSS and Drayton Grange Farm, rerouting through Fenny Drayton village, creating additional commercial traffic movements and vehicle manoeuvring difficulties for articulated vehicles.
- The practical effect of the proposed restriction would therefore be to transfer operational traffic onto less suitable local routes, rather than removing the underlying need for those movements.

Signalisation of the Drayton Lane junction is technically feasible and deliverable

- ERSS submitted a detailed technical note, prepared by DTA Transport Planning Consultants, demonstrating that if the signals at both junctions were appropriately synchronised, unacceptable queuing would not occur. This note included modelling, a detailed topographical survey of the junctions and an independent review by JCT Consultancy who developed the LinSig model used in the technical note and by the Applicant in their models.
- On 11 November 2025, NH issued its Alternative Mitigation Review (AMR). In this report, NH made a significant concession and reversed its earlier position. NH confirmed that full signalisation of the Drayton Lane and Woodford Lane junctions is a safe and deliverable alternative to closing off half of the Drayton Lane junction with the A5.
- NH's principal caveat relates to achieving the necessary geometry. ERSS has already confirmed willingness to make land available to facilitate an appropriate layout.

The remaining concerns do not justify dismissing the signalised alternative

- NH raises concerns regarding traffic reassignment through Fenny Drayton; however NH acknowledges that no modelling has been undertaken to quantify this effect – the scale is therefore speculative and unquantified.
- DTA considers the potential for reassignment is likely to be limited due to the significant reduction in queueing expected from the Applicant's proposed improvements to the A5/A444 Redgate junction.

- NH acknowledges that if there is some reassignment of traffic through Fenny Drayton, it is “not an insurmountable issue”. If required, mitigation measures (priority changes, traffic calming) are expressly identified as available by NH. Low-cost measures could also include signal timing adjustments (e.g. longer red periods for vehicles exiting Drayton Lane).
- By contrast, the harm caused by the proposed LILO arrangement is direct and identifiable. It would materially restrict an established access, result in operational traffic, including HGV movements, rerouting through less suitable local roads, and impose a disproportionate burden on existing businesses as a consequence of a third-party development. A technically feasible and deliverable alternative is now available.

1.0 Introduction

- 1.1 Drayton Lane currently accommodates lawful access, including HGV movements associated with established local businesses and agricultural operations. This includes access serving approximately 2,000 household and business self-storage customers at ERSS, together with the arable farming operations at Drayton Grange Farm.
- 1.2 These representations are submitted on behalf of Extra Room Self Storage (ERSS) and Drayton Grange Farm (referred to below as “the Objectors”), both of whom have longstanding lawful access onto the A5 at the Drayton Lane junction.
- 1.3 Following receipt of the National Highways Alternative Mitigation Review (‘AMR’), the planning permission (22/00882/OUT) was subsequently quashed by consent to allow the implications of the new information contained within the AMR to be properly considered as part of the determination process.
- 1.4 This note is not intended to reopen all highway matters associated with the MIRA development. Its purpose is to assist the Committee in considering the specific issue which has now become central to the redetermination of the application: whether it remains reasonable and proportionate to approve a mitigation package that restricts established access at Drayton Lane, given that NH now accepts that a signalised alternative is technically feasible and operationally deliverable.
- 1.5 The MIRA development proposes to restrict this junction to left-in / left-out movements only, which would materially interfere with the Objectors’ established access and significantly affect the operation of their businesses. The Objectors have consistently demonstrated that there are no material constraints to the MIRA development providing an alternative scheme which retains all movements at this junction. They submitted a detailed technical note, including modelling, with schemes based on detailed topographical survey, to support that conclusion.
- 1.6 This has been subject to review by National Highways (“NH”). Their own Alternative Mitigation Review (AMR) confirms that full signalisation of the Drayton Lane and Woodford Lane junctions is technically deliverable and would not create any unacceptable congestion or safety risks. The primary constraints identified in their review relate only to localised geometry and land issues, both of which can be addressed, with the Objectors having already confirmed willingness to contribute land to facilitate an appropriate layout. The response also highlights potential issues of rat-running on Drayton Lane. Whilst this falls outside NH’s core remit, assessment of the available modelling indicates there would be no material change in use of Drayton Lane.
- 1.7 The alternative signalised solution has been dismissed by NH solely on the basis that it would involve greater cost to the applicant, not because it is technically unworkable or unsafe. The cost of the works is unlikely to be material in the context of the overall highway package proposed by the applicant, which includes two new roundabouts, a new link for the A444, partial dualling of the A5 and a link road between the A5 and Weddington Lane.

1.8 It is also noteworthy that the initial August 2022 planning proposal included traffic lights at both the Woodford Lane and Drayton Lane junctions with the A5, indicating that signalisation of both junctions was costed and considered economically viable at that stage.

1.9 In these circumstances, the Committee is asked to consider whether it is reasonable and proportionate planning to restrict longstanding access rights relied upon by existing businesses when a technically deliverable alternative exists that would preserve those rights.

2.0 Impact of the Proposed Access Restriction

2.1 MIRA's application proposes to restrict the junction of Drayton Lane with the A5 to left-in and left-out movements only as a consequence of MIRA's own development traffic.

2.2 The Objectors' businesses have operated with unrestricted A5 access at this junction for many years. The proposed restriction would:

- Remove the ability of HGVs and other vehicles serving ERSS and Drayton Grange Farm to make right-turn movements onto and off the A5, a fundamental operational requirement for both businesses.
- Force vehicles to use alternative, unsuitable routes through the local road network, including through Fenny Drayton village, significantly increasing distance, time and operating costs.
- Disproportionately burden the Objectors' businesses for the purpose of accommodating traffic generated by MIRA's development.
- Constitute a material interference with the Objectors' existing lawful access, a matter not adequately addressed by NH.

2.3 Existing access rights should not be materially restricted as a consequence of a third-party development without proper consideration of whether a reasonable alternative exists that avoids that harm.

3.0 National Highways Confirm Signalisation Is Technically Deliverable

3.1 The AMR expressly concludes:

“NH agrees with the DTA assessment that it is technically possible to signalise Drayton Lane without causing undue congestion or safety risks provided additional land is secured to achieve the required geometry...”

3.2 Here NH has accepted in principle that:

- There is no insurmountable safety barrier to providing the scheme;
- There is no inherent capacity constraint; and
- The scheme is technically feasible subject to geometry and land.

3.3 The Objectors have already confirmed willingness to make land available in the north-west quadrant to facilitate an appropriate layout. Accordingly, the only technical obstacle identified by NH (land take) is capable of resolution.

3.4 NH states that the TCPA process does not require comparison of schemes. That may be procedurally correct, it does not remove the requirement for decision makers to consider whether a reasonable and deliverable alternative mitigation exists that would avoid unnecessary harm to third parties. Where such an alternative exists, as NH itself acknowledges, it is clearly a material planning consideration.

4.0 Operational Modelling Confirms Signalisation is Feasible

4.1 NH provides commentary on aspects of the modelling undertaken by DTA. These technical observations are noted, but they do not undermine the feasibility of full signalisation. NH's own updated LinSig modelling confirms that joint signalisation of Woodford Lane and Drayton Lane is operationally feasible.

4.2 Furthermore:

- Geometry issues at Drayton Lane are described in the AMR as 'not insurmountable' and capable of resolution through widening and alignment changes, with the Objectors willing to contribute land to facilitate this.
- The HGV safety concerns raised in the original Road Safety Audit were reviewed by NH's Safety Team, which concluded the risk was so infrequent that no mitigation was required from MIRA. It is therefore inconsistent to cite HGV safety as a reason to dismiss the alternative.
- CD123 para 7.18 requirements for separately signalled right turns and separation islands are matters of detailed design, not reasons to dismiss the principle of a signalised scheme.

4.3 None of these points undermine the central conclusion that signalisation is technically deliverable.

5.0 Rat-Running Concerns Are Speculative and Mitigatable

5.1 NH raises concerns regarding potential traffic reassignment through Fenny Drayton (AMR, Section 2, p.9). However:

- NH acknowledges that no wider Paramics modelling has been undertaken – the scale of any effect is therefore speculative and unquantified;
- DTA considers the potential is limited, particularly given the significant reduction in queueing on the A444 arising from the Applicant's proposed upgrade to the Redgate roundabout; and

- NH identifies that any localised impacts could be mitigated through measures such as traffic calming or priority changes (p.9). It concludes by saying it is “not an insurmountable issue”.
- 5.2 In simple terms, through traffic will only use Drayton Lane if it is quicker, more comfortable and more convenient than using the A444 / A5 junction:
- For most of the day (Google reports), it is not.
 - However, in the AM peak, queues of around 500m can form on the A444 approach to the A5, adding up to 5 minutes to journey times. This is when Drayton Lane can become an attractive route for traffic bound to Woodford Lane or A5 West.
- 5.3 Crucially, the Applicant’s own proposals include significant capacity improvements at the A444/A5 junction with the introduction of a new, upgraded roundabout. Their modelling confirms that these queues will be substantially reduced, removing the primary incentive for through-traffic to divert via Drayton Lane.
- 5.4 For northbound movements, at present, there are around 300-350 vehicles per hour (depending on the peak hour), traveling from the A5 to the A444 on Drayton Lane. Signal control would not change the propensity for drivers travelling northbound from the A5 West (circa 50-60% total) but would introduce minor additional delay for drivers (on average 60 seconds) travelling from Woodford Lane (or A5 East) which is likely to be sufficient to switch through-traffic back to the A5/A444 route via the upgraded Redgate roundabout albeit Drayton Lane will remain the preference for local access traffic. Overall, for northbound traffic, restricting right turns would not deliver wider network benefits, but would materially harm local access.
- 5.5 For southbound movements, there are around 250-300 vehicles per hour in the AM peak and less than 200 vehicles per hour in the PM peak. If there is a through traffic component here, then the removal of the current delay at the A5/A444 junction will result in a reassignment both under signals and the proposed right turn ban. Most of the existing southbound demand turns left at the junction towards Woodford Lane. This traffic movement is allowed for in both the signalised arrangement and the right turn ban option, further reinforcing the view that the configuration of the Drayton Lane junction is neutral for through traffic. The right turn is around 60 – 70 movements. Depending on the timing of the signals, these movements will experience an average delay of around 60 seconds which is comparable to the delays currently experienced when waiting for a gap in traffic on the A5 at the existing junction. A longer red period, could also be used to make the route even more unappealing. Overall therefore, for southbound traffic too, the right turn ban would lead to limited reassignment benefits (if any) but would materially harm local access.
- 5.6 For the above reasons, any reassignment of through-traffic is likely to be broadly similar under both a signalised arrangement and the proposed right-turn restrictions.
- 5.7 The principal driver of reassignment is the significant improvement in operation at the A5/A444 junction, not the configuration of the Drayton Lane junction. Under existing conditions, delays of up to approximately five minutes are observed on the A444 approach during peak periods (as evidenced by typical journey time data).

- 5.8 Whilst the TA does not directly report journey time savings, it demonstrates that the proposed A444/A5 junction operates well within capacity in the future scenario. This represents a substantial improvement in network performance and would be expected to materially reduce the delays currently experienced on the A444 approach.
- 5.9 As a result, the incentive for through-traffic to divert via Drayton Lane is significantly reduced.
- 5.10 The differences between signalisation and right turn restrictions are therefore likely to be modest or negligible in network terms. In the absence of modelling to quantify this, NH nevertheless concludes that any reassignment of traffic through Fenny Drayton is “not an insurmountable issue”. If necessary, the benefit of diverting via Drayton Lane could be further reduced with the introduction of proportionate mitigation measures. For example, changes in junction priorities or traffic calming features in or around Fenny Drayton.
- 5.11 The key distinction is therefore not traffic impact, but access. While the network effects are expected to be broadly similar and proportionate mitigation options are available, the proposed right-turn restrictions would materially harm local access to established businesses, whereas a signalised solution would retain that access.
- 5.12 It would be disproportionate to restrict an established access on the basis of an unquantified and mitigable effect.

6.0 Objection is Cost, Not Highway Safety

- 6.1 NH acknowledges that signalisation is more costly than the applicant's preferred scheme and that economic viability is a matter for MIRA.
- 6.2 However, no viability assessment has been submitted to demonstrate that full signalisation would render the MIRA development unviable. In the absence of such evidence, the Committee should not accept that the cheaper option is necessarily the most appropriate planning outcome, particularly where it causes significant harm to third-party access rights.
- 6.3 They should also consider that cost of the works is unlikely to be material in the context of the overall highway package proposed by the applicant, which includes two new roundabouts, a new link for the A444, partial dualling of the A5 and a link road between the A5 and Weddington Lane.
- 6.4 It is also noteworthy that the initial August 2022 planning proposal included traffic lights at both the Woodford Lane and Drayton Lane junctions with the A5, indicating that signalisation of both junctions was costed and considered economically viable at that stage.

7.0 Conclusion

- 7.1 These representations are not intended to obstruct the MIRA development. They are made to ensure that the planning process gives proper and proportionate weight to the interests of existing landowners and businesses whose established access rights will be directly harmed by MIRA's proposals.

- 7.2 ERSS and Drayton Grange Farm have sought to engage constructively throughout: commissioning independent technical work, instructing specialist planning and transport planning consultants, and offering to contribute land to enable the alternative mitigation to be delivered. They have demonstrated that a better solution exists. They ask that their access rights are not sacrificed for the convenience of an applicant who has not shown that a more protective solution would render the development unviable. Notably, the Applicant itself proposed a similar signalised junctions at both locations in its August 2022 Transport Assessment, demonstrating that such a solution was previously considered viable.
- 7.3 NH's own report confirms the alternative is technically deliverable. The report also confirms that perceived rat running risk is "not an insurmountable issue" if indeed it is an issue at all. The question for the Committee is whether it is reasonable and proportionate planning to allow the alternative to be dismissed on the basis of cost, without any balancing of the harm caused to third parties whose only fault is having established their businesses in lawful reliance on their existing A5 access.
- 7.4 Overall, the alternative signalised mitigation proposal represents a technically feasible and operationally deliverable solution which provides an appropriate and balanced approach to both strategic and local highway issues and should therefore continue to be given full consideration as part of the determination of the application.