

Warwick District Council
Local Plan Examination

Response to Inspector's Matters and Issues

Matter 14 - Transport

Policies TR1 – TR6

Infrastructure Delivery Plan (in respect of transport)

Issue

Whether the approach to transport is justified, effective and consistent with national policy.

October 2016

Policies TR1 to TR6 and Infrastructure Delivery Plan (in respect of Transport)

1. What is the likely effect of the proposed scale and distribution of development on existing transport infrastructure, traffic levels and air quality? How has this been assessed?

Background

- a) Please see the Council's statements for Matters 2, 3 and 4 (Overall Provision for Housing, Supply and Delivery of Housing Land, Spatial Strategy) and the Distribution of Development paper (HO25PM) and Housing Supply Topic Paper (HO27PM) for detailed discussion and consideration of the Council's approach to the scale and distribution of development.
- b) The Distribution of Development Paper (HO25PM) explains how the Council reviewed the spatial options having regard to the particular spatial dimension of the additional need that had to be met. Paragraphs 16 to 29 summarise the approach the Council took and the justification for this.
- c) As part of the reconsideration of housing provision generated by the Inspector's concerns about meeting local and sub-regional needs, the Council undertook a refresh of the development strategy approach and assessed a series of options in the Sustainability Appraisal (SA). The result of the review was that Option 5 performed best (see table 3.4 of SA11PM). It optimises the protection of the Green Belt with the imperative to make best use of previously developed land whilst directing growth to sustainable locations on the edge of settlements in a way that is calculated to minimise movement and promote sustainable travel options (see table 3.5 of SA11PM).
- d) The spatial strategy recognises that there are housing needs and economic benefits that need to be balanced against environmental impacts and highway and other infrastructure capacity issues for all the built-up areas and settlements in the district and also for Coventry. For this reason, the Strategy seeks to locate growth on the edge of all of the district's towns and on the periphery of the city rather than focus it either on any one location or on the development of a new settlement.
- e) This approach allows significantly more housing to be developed without harming the long term integrity of the Green Belt to the south of Coventry, and in Kenilworth and sustainable villages. The identification of sites in the Modifications therefore reflected this distribution of growth.
- f) The particular strength of this approach is that it "fits" the spatial strategy of the Submission Plan and responds to the imperative to assist Coventry by placing new development close to where need arises and where it can be serviced and accessed efficiently and effectively. This approach seeks to minimise the need to travel in line with

NPPF paragraph 37.

Impacts of development on transport infrastructure

- g) The Council is aware of the potential impacts of additional housing on an already busy road network and it has commissioned a series of comprehensive assessments of potential impacts of development. To date, there have been four main strategic transport assessments carried out, including additional work at Preferred Options stage, on the proposed modifications and on more specific issues relating to safe access to the highways from the various sites.
- h) The strategic transport assessments are listed under the Submission Documents as documents TA01 – TA13. For the modifications, the assessment of additional housing allocations is document TA14PM.
- i) The outcome of this process has been that the Council is confident that its proposed sites and the level of housing identified on them is either within the capacity of the existing network or can be appropriately mitigated to ensure that adverse impacts are minimised.
- j) The ability to mitigate the impacts of new development on the highways network is also addressed in the STA modelling work (TA14PM) and is summarised below.

Traffic Levels

- k) Traffic levels in the district within the area affected by proposed housing and employment allocations have been determined through analysis of Warwickshire County Council's Warwick and Leamington Wide Area Model and Kenilworth and Stoneleigh Wide Area Model. The 2011/12 models identify an increase from 395,600 trips to 477,500 trips within the modelled areas during the 3hr AM and PM peak periods. This equates to growth of approximately 21%; this value closely matches the forecast demands for the area identified in the Department for Transport's National Trip End Model (NTEM).

Air Quality

- l) Air quality was assessed prior to submission of the plan in the document Air Quality Assessment: Development Associated with Local Plan (2013, AO1).
- m) Following the identification of additional sites through the modifications process, an update to this work was commissioned (A04PM).
- n) Paragraph 5.2 of the update states:
For all pollutants, there are much lower concentrations in 2028 than in 2015. This reduction is associated with the introduction of more stringent emissions controls on new vehicles via Euro standards; in 13 years' time the Euro 6/VI vehicles will make up

the majority of the fleet on the roads in the UK. Although there is still some uncertainty relating to the real world emissions of Euro 6/VI vehicles, it is considered that substantial reductions in concentrations will occur by 2028.

- o) The report demonstrated that despite the estimated additional traffic generated by the proposed increase in housing numbers, air quality was deemed likely to largely remain as originally predicted over the plan period. This was due to various factors, including more efficient and cleaner vehicle engines.
- p) The report stated that for the “preferred option” of additional development relating to the increase in housing numbers, changes in air quality were mostly negligible to slight throughout Warwick, Leamington Spa, Kenilworth and Stoneleigh. Some beneficial impacts are found along High Street and Jury Street in Warwick and along The Square, High Street and Borrowell Lane in Kenilworth (paragraph 5.3)
- q) The conclusion of the updated report states at paragraph 5.4,
Overall, the increase in emissions from road traffic generated by the Preferred Option for the housing provision of the Local Plan has a negligible impact on air quality conditions throughout Warwick, Leamington Spa, Kenilworth and Stoneleigh.

2. How does the plan seek to mitigate transport impacts and address issues of transport infrastructure? Is this effective?

- a) The Phase 2 Strategic Transport Assessment (STA09) explored a “Southern Focus option”. This tested the impact of accommodating 6,250 dwellings in the area outside the green belt. Whilst this showed that, with mitigation, this scale of development could be accommodated, the Local Plan proposals combined with existing completions and permissions exceeds the scale tested in this model. However the Secretary of State decisions for the Asps and Gallows Hill indicated that developments at these locations could be accommodated subject to the mitigation set out the respective section 106 agreements.
- b) The strategic modelling undertaken on the network also suggested a series of mitigation measures that would help to alleviate and address traffic and highways impacts generated by the new development being proposed. During each of the previous stages of the STA, mitigation has been identified as suitable to accommodate the additional demands associated with the Local Plan sites. In certain circumstances, the mitigation measures have been subject to a process of continuous review and refinement which has run in parallel to the STA and Local Plan determination process.
- c) These are set out in more detail in Appendix B of TA14PM but based upon the details of the modelling scenarios, the following broad conclusions were drawn: -
 - i. For the Warwick and Leamington Wider Area and Revised Development Allocation and new sites modelling (from Modifications process) –
 - journey times / vehicle speeds will worsen - despite this, additional mitigation

measures identified will be able to, at least in part, accommodate the additional traffic volumes generated by new sites.

- junctions on either end of Myton Road could potentially constrain traffic volumes in the area - further work should take account of the impacts on Warwick or Leamington Town Centres.
 - queuing observed into Warwick and at M40 Junction 15 meriting further investigation - issues unlikely to become severe until nearly 100% of allocated housing numbers are delivered.
 - issues will be dealt with through corridor strategies - recommend that town centre strategies are added to IDP schedule;
 - more work on the nature and form of the M40 capacity enhancements will also, inevitably, be completed earlier in the Local Plan delivery period than is predicted within the modelling, to be an issue.
 - A452 north of Leamington - delivery of this scheme in full will unlock additional capacity across the network by accommodating a greater number of trips to the north, which alleviates problems elsewhere on the network. Thus, whilst there are a limited number of sites immediately adjacent to the area, the proposals add significant additional capacity to the highway network, which in turn serves to mitigate growth-related congestion issues elsewhere on the network
- ii. For the Kenilworth and Stoneleigh Wider Area, Revised Development Allocation and New Sites modelling –
- mitigation measures identified likely to be able to sufficiently mitigate strategic level impacts that occur as a result of the allocation of new housing sites.
 - introduction of reconfigured Stoneleigh Road / A46 junction proposals will potentially alleviate issues elsewhere on the network by providing a higher capacity alternative route.

3. What specific improvements to transport infrastructure are proposed or will be required? What is the likely cost? How will they be brought forward and funded?

- a) A number of improvements are proposed to transport infrastructure related to proposed allocations in both the Submission Local Plan and the subsequent modifications. These are set out, along with costs and broad timeframes in Appendix B of the Strategic Transport Assessment 2016 (TA14PM) and are captured in the Infrastructure Delivery Plan (IDP) (IN07PM), which was updated in June 2016. An accompanying committee report (IN08PM) sets out further details about the situation with regard to funding.
- b) In terms of funding, the IDP provides a broad outline of funding opportunities that are being pursued including planning obligations and bids for government funding. It is becoming clearer that a significant contribution to assist Warwick District has already been assembled through developer contributions. It also appears likely that significant input from other sources (CWLEP Strategic Economic Plan Growth Deal bids) will augment the funding and delivery of highway/ transport-related infrastructure.

- c) A number of mitigation schemes are now part funded, fully funded or currently being delivered, for example:
- i. Infrastructure T2 (A452 Europa Way corridor schemes) are part-funded through S106 (£17.5m WDC development sites and approximately £2m from SDC development sites (subject to signing agreements)). The County is currently in discussions with a number of developers regarding delivery of S278 schemes which form a significant proportion of the remaining infrastructure included in the corridor strategy (including P&R). A funding bid has also been submitted to the CWLEP to secure Growth Deal funding, the outcome of this is expected post-Autumn statement.
 - ii. Infrastructure T9 (A46 / A425 / A4177 Birmingham Road, 'Stanks Island') - cost of £6m is now fully funded through £3.1m Single Local Growth Fund, £2.6m County funding and £300,000 developer funding and is a committed scheme; construction is due to commence in spring 2017.
 - iii. Infrastructure T15 (A46 Stoneleigh Rd and Dalehouse Lane roundabouts) - the County Council and Coventry City Council are in discussion with the Department for Transport (DfT) to formally agree the reallocation of Growth Deal 1 funding to deliver improvements at the A46 Stoneleigh junction. This process is expected to conclude early in 2017. Any balance of funding which is required for the scheme is expected to be sourced from HS2 Ltd, S106 / CIL monies or locally held capital funds. The scheme is planned for delivery in mid-2019.
 - iv. T14 (Transport Infrastructure: Sub-Regional Employment site) - the developer is in discussion with the County regarding the delivery of S278 schemes.
 - v. Rail - NUCKLE 2 Kenilworth Station is fully funded and under construction.

4. How will the provision of transport infrastructure be related in terms of timing / phasing to development proposals?

- a) Paragraph 3.1 of the IDP (IN07PM) states,

The responsibility for delivering infrastructure lies first and foremost with the infrastructure providers. These organisations need to adapt their provision to support a growing population. However, the approach is inevitably a complex one requiring input from a range of organisations, including the District Council (in providing housing and population growth data, in agreeing section 106 contributions, providing CIL monies etc.). This requires a careful partnership and project management approach involving providers, funders and developers. To support this, the Council will be developing a clear and transparent process for ensuring developer contributions (whether through Section 106 or CIL) reach the infrastructure providers and for holding the infrastructure providers to account for timely and effective delivery. As the Local Plan moves from the preparation phase to the delivery phase, so will the resources to ensure effective delivery.

- b) Again, the IDP identifies that the timing and delivery of infrastructure requirements in general (including transport) is a priority. Paragraph 2.4 of IN07PM states,
- The Council has also employed a Site Delivery Officer who has responsibility for ensuring developer contributions are paid and for liaising with infrastructure providers to ensure these contributions are used to deliver priorities in a timely manner.*
- c) The Council and its partners in infrastructure delivery are working together to increase the likelihood that infrastructure will be provided in advance of, or alongside, new housing rather than in the years following its occupancy. This is important to enable new communities to become established and integrated quickly and to ensure that the impacts of growth on the District's existing communities are minimised.
- d) Essential transport infrastructure will therefore need to be in place at an early stage of development. The detailed timing will need to be established through the planning application process.
- e) The relationship between sites and trajectories will be the guide for the assessment and designation of trigger points for the delivery of infrastructure. This process will be subject to developer intent and the delivery rates of sites cumulatively over time.
- f) The Strategic Transport Assessment, February 2016 (TA14PM – Appendix B), also helps in terms of identifying broad timescales for delivery of infrastructure – the column headed “Stage of Delivery” identifies whether the proposed schemes should take place during the early, medium or later stages of the Plan period. Appendix B also sets out the identified form of funding for each proposal.

5. How will other agencies and organisations be involved? What level of commitment / agreement is there?

- a) Transport infrastructure is predominantly delivered by Warwickshire County Council although other providers also have a role to play, such as Highways England, Network Rail, the District Council (in providing parking and pedestrian and cycle facilities across district land), public transport operators and Sustrans.
- b) The County Council has played a leading role in researching and planning this element of the IDP; this has been informed through the Strategic Transport Assessments. The County will continue to play a lead role in implementation. Highways England has contributed to and reviewed all Strategic Transport Assessment reports and supports the mitigation proposals therein. Sustrans also contributed to the Strategic Transport Assessment in respect of the proposed cycle infrastructure proposals.
- c) The County Council has set up a regular development liaison group with Coventry City Council in order to form a joint approach to dealing with developments to the south of Coventry and on the County boundary.

- d) The County Council continues to develop and refine schemes identified within the STA and IDP in order to help secure future funding. The County Council is working closely with developers to ensure appropriate levels of contributions are secured in order to mitigate impacts on the network and to ensure schemes identified are compatible with the overall transport strategy.

6. What is the current situation regarding a rail station at Kenilworth?

- a) Rail infrastructure is an important element of transport infrastructure, particularly for Kenilworth where there is a fully funded DfT programme for the implementation of a new railway station.
- b) The delivery of Kenilworth Railway Station at Priory Road is now underway. Work commenced in July 2016 and it is anticipated that the station will be operational by August 2017. The rail service will be hourly and operated by London Midland trains. The station facility will include a platform, an accessible footbridge with lifts, a staffed ticket office, waiting room and toilets, a 79-space car park and a bus stand.
- c) This project is being delivered by Warwickshire County Council and will significantly enhance rail access for the current (and future) residents of Kenilworth to locations such as London, Birmingham, Coventry and Leamington Spa as well as providing rail transport links for those visiting Kenilworth. It is envisaged that the project will help improve accessibility and encourage increased use of the train for journeys that might otherwise be undertaken by car.
- d) The service from Kenilworth will also integrate with the DfT funded 'NUCKLE1' scheme being delivered to enhance local rail services between Nuneaton and Coventry.

7. What is the basis for the areas of search for park and ride? What would be the potential implications of these? Would there be adverse effects? What is the current situation?

- a) Policy TR5 identifies the importance of safeguarding areas considered for various forms of transport infrastructure (including park and ride) from other forms of development that might sterilise them. Paragraph 5.59.3 of the explanatory text identifies that the May 2013 STA originally introduced the idea of a park and ride to the south of Warwick / Leamington and that it needed to be close to extant and potential bus routes. Broad locations were indicated on the Policies Map until such time as firm proposals were agreed. It was recognised that further work would be needed to establish the feasibility of such a service.
- b) Park and Ride studies undertaken by WCC identified two Park and Ride sites within close vicinity of the two areas of search; one site to the north of Leamington Spa, and another to the south of Warwick / Leamington Spa). These two sites are located on the key corridors for car journeys into and through the towns along which a number of bus services also operate. It is anticipated that the northern site could potentially serve Leamington and Kenilworth. A southern site would serve Leamington and Warwick, with through services to the aforementioned northern park and ride site.

- c) In particular, since publication of the Local Plan, the Atkins report (TA1– Jan 2015) provides a much clearer basis for the consideration of park and ride. This report identifies park and ride as a key part of the sustainable transport strategy in that it has a significant impact on traffic flows and is deliverable. Sections 9 and 10 of the report summarise current thinking.
- d) The STA undertaken in May 2013 looked at the potential for park and ride provision in the district as a means of alleviating traffic running into the south of Warwick / Leamington, especially from the M40. The analysis at that stage was necessarily vague, as no detailed work had been done to establish potential usage, modal shift, possible journey times or other benefits.
- e) It was assumed that a site would be located within land southwest of Europa Way roundabout and would be served by a link through the adjacent development site. Section 9 of TA7 refers.
- f) The exercise undertaken at the time only considered a site to the south of Warwick / Leamington on the basis that: -
 - i. this was the focus of housing growth and thus the park and ride had more potential to mitigate a relatively higher proportion of impacts,
 - ii. the site location would serve both town centres,
 - iii. there were already a number of identified mitigation schemes that could more easily be adapted to provide bus priority lanes, and
 - iv. the proposed improvements to bus services to meet additional demand from the growth to the south of the towns would also serve the park and ride.
- g) The report also noted that there was the potential for a similar facility to the north of Leamington on the A452.
- h) Benefits of park and ride schemes include reduction in traffic and congestion, fewer emissions in towns served by the service and a freeing-up of parking within towns. Disadvantages include the construction of urbanising influences in the countryside / Green Belt and localised issues of air pollution, fumes and noise.
- i) The planning application allowed on appeal at The Asps in early 2016 (application number W/14/0300) included a park and ride facility, which would be funded by the developer. The facility would provide up to 500 spaces and a dedicated bus service every 15 minutes. The Secretary of State agreed with the Appeal Inspector that the park and ride facility would be a substantial benefit with the potential to reduce traffic not only in the town centre but also on the surrounding highway network and would also help to alleviate town centre parking congestion.
- j) A further park and ride has been proposed by the promoters as part of the H44 site north of Milverton, although the Council has not allocated any specific part of the site for park and ride. It has been identified as a potential benefit of this site and is encompassed in the SOCG

with Taylor Wimpey. Again, this would be funded by the developer and would offer around 400 spaces.

- k) The park and ride area of search did not originally consider the site north of Milverton. As part of the 2016 modifications, the Council has proposed and consulted on an extended area of search for the Park and Ride facility to encompass the eastern part of site H44. This is shown on the Policies Map.

8. What is the current situation regarding other transport infrastructure projects?

- a) The draft IDP (IN07PM) sets out in Appendix A the transport proposals for various key corridors through the district. These corridors have been identified as the main arteries of movement within and between towns, employment areas and other locations such as educational establishments. The land covered by the key corridors is within the ownership of Warwickshire County Council or otherwise is controlled by developers and are generally accepted as mitigation proposals / strategies for transport.
- b) The spatial approach demonstrated by the key corridors approach shows how different modes of transport can be co-ordinated to maximise the effectiveness of the whole system and within specific areas. This will form the basis for further work on detailed design and delivery of transport schemes moving forward.
- c) The corridors in question are set out in the introductory paragraph of the Appendix but for convenience are reproduced below: -
- i. A452 Europa Way 'Sustainable Spine' Corridor
 - ii. A452 Corridor (Leamington to Kenilworth)
 - iii. Warwick - Leamington – Lillington (via Emscote Road)
 - iv. Leamington South (including Tachbrook Road)
 - v. Warwick Town Centre to Heathcote via Gallows Hill
 - vi. Warwick Town Centre to Leamington (via Myton Road)
 - vii. A429 Coventry Road, Warwick
 - viii. A425 Birmingham Road, Warwick
 - ix. A429 Stratford Road, Warwick
 - x. Strategic Corridor Improvements
 - xi. Kenilworth Improvements
- d) The latest STA (TA14PM) identifies some suggested amendments to the corridor strategies alongside some additions to them focussing on the following: -
- i. A46 to Cubbington
 - ii. Town Centre Transport Strategies (Kenilworth, Warwick, Leamington)
 - iii. A46 to Westwood Heath (via Gibbet Hill)
 - iv. M40 / A46 SRN Capacity Enhancements
 - v. Broader Transport Impact Strategy

- e) The various corridor proposals include bus / park and ride, cycle and pedestrian measures as well as road and railway improvements.
- f) Paragraph 3c) above provides some further information on the progress of a number of key transport initiatives.
- g) Detailed work on many of these improvements has commenced or will commence once developer funding is received. For example:
 - i. ci) - detailed work has now started and developers are engaging in delivering S278 schemes that are compatible with district and county aspirations for the corridor.
 - ii. cii) - a detailed bespoke assessment of the improvements has been undertaken to support funding bids and business cases development.
 - iii. civ) – detailed modelling assessments have been undertaken to support business case submissions.
 - iv. cviii) - now committed and construction will commence in Spring 2017.
 - v. diii) - A46 to Westwood Heath - extensive assessment work has been undertaken on the A46 / Stoneleigh junction, and is currently at detailed design stage. The County Council is currently in discussions with DfT regarding funding; this funding is expected to be confirmed early in 2017. Construction is expected to be completed by 2019/20
 - vi. div) - M40 / A46 SRN - the County Council has worked with Highways England to provide extensive evidence to support improvements in this area through both the Highways England Road Investment Strategy and Midlands Connect.

9. In other respects are the Transport policies justified by evidence? Are they sufficiently clear? Do they provide adequate flexibility? Are they consistent with national policy?

- a) National policy is set out in the NPPF. Section 4 – Promoting Sustainable Transport – identifies the important role transport policies have to play in facilitating sustainable development. The Council has worked closely with the County Council's Highways Department and with adjacent authorities and other stakeholders to identify a suite of policies and appropriate levels of infrastructure that will enable the proposed quantum of development to be delivered with adverse impacts minimised and mitigated.
- b) The Council has been keen to ensure that policies and proposals included in the local plan enshrine the need to minimise travel and encourage use of sustainable modes of transport. This has been used as a key objective in locating its proposed housing allocations. This has resulted in strategic sites for additional housing being allocated close to extant built-up areas, where services and facilities are available in close proximity.
- c) It has also identified the opportunities to establish infrastructure such as park and ride schemes and rail improvements that will give people the ability to make choices about their means of travel and allows for additional flexibility in delivering a comprehensive and joined-up public transport network.

TR1 Access and Choice

- d) The Transport policy TR1 identified in the Local Plan is based on evidence provided by the County Council in the form of a series of Strategic Transport Assessments, accompanying technical notes and detailed assessment of the sustainable transport initiatives in the Atkins Warwick and Leamington Report. Evidence within these assessments is based upon: -
- i. detailed modelling assessments using the County's micro-simulation traffic models which meet all required WebTAG standards in terms of model calibration and validation and follow WebTAG guidance in the application of traffic growth;
 - ii. Case studies considering the application of modal shift and the propensity to adopt different modes of travel;
 - iii. Advice from County Transport Planners on safe and suitable access to developments sites.
- e) Schemes identified to mitigate these impacts have been identified in accordance with NPPF policy in that mitigation is located on the network where impacts are considered to be severe. In line with the NPPF, developments should plan to protect and exploit opportunities for sustainable modes of transport. The IDP - Appendix A, Transport Corridor Strategies - identifies the opportunities to improve the sustainable travel access and the County are actively developing these strategies into deliverable schemes. The assessment of the Local Plan allocations is consistent with the Core Planning Principles of the NPPF, which state that:
- 'planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'.*
- f) The County will be seeking to ensure that these transport strategies and the housing and employment allocations are developed to meet the Local Plan Transport policies and adhere to national policy.

TR2 Traffic Generation

- h) This policy is intended to support the management of traffic generated by new development of all types. It is clear that development will not be permitted that adversely impacts on health and wellbeing through the generation of additional traffic unless it can be adequately mitigated. Development creating issues around air quality should be supported by an air quality assessment and mitigated as appropriate. Transport assessments will be required as appropriate and the cumulative impact of development should be assessed.
- i) The emerging Local Plan has been subject to a series of strategic transport assessments that effectively modelled the impacts of proposed housing sites on traffic levels and the local road network. In this way, the Council was able to ascertain whether and where traffic might prove to be a barrier to development and what mitigation might be required to allow it to take place. An example of this is at Westwood Heath, where site H42 was capped at 425 dwellings during the plan period on the basis that any additional development would have an unacceptable impact by virtue of the traffic that would be generated (TA14PM).

- j) The policy is flexible in that, although it seeks to resist inappropriate development, it recognises that with suitable mitigation such development may be made acceptable. In the case of additional traffic generation, the policy requires transport assessments to be prepared in appropriate cases to demonstrate that development will remain sustainable and additional vehicle movements will not impinge on the economic, social or environmental aims of the plan.
- k) Planning Policy Guidance contains information on the need for, and form of, a transport evidence base in plan making, as well as further information on travel plans, transport assessments and statements.
- l) The NPPF (section 4) sets out the requirements for assessing transport movement impacts. Paragraph 34 requires plans and decisions to:
 - ... ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.*
- m) The development strategy adopted by the Council in its Local Plan is based on ensuring that as far as possible development allocations are located in parts of the district that are close to existing built-up areas and centres of population, to minimise the need to travel.

TR3 Transport Improvements

- n) The County Council has undertaken a wider assessment of the cumulative impact of Local Plan allocations on traffic generation and related impacts on the highway network. This has enabled the identification of strategic infrastructure to mitigate these cumulative impacts.
- o) Large-scale developments will need to be supported by Transport Assessments in order to demonstrate practical and effective measures to mitigate impacts resulting from the specific development site and to determine an appropriate level of financial contributions to the mitigation measures.
- p) These Transport Assessments adhere to the DfT guidance on Transport Assessments, the NPPF and the County Council's Local Transport Plan 3 policies (Ch. 17 - Land Use and Transportation Strategy).

TR4 – Parking

- q) The Council has provided a policy that reflects the need to manage car use and promotes the use of other means of transport. It also reflects the Council's published Car Parking SPD, which was adopted in 2007. The SPD sets maximum standards and development that meets those standards is considered to be appropriate in most circumstances, although there is the flexibility to allow for a lower level of provision in appropriate circumstances.

- r) The policy is in accordance with the requirements of the NPPF, which at paragraph 39 requires local planning authorities to take the following into account: -
- the accessibility of the development;
 - the type, mix and use of development;
 - the availability of and opportunities for public transport;
 - local car ownership levels; and
 - an overall need to reduce the use of high-emission vehicles.

The explanatory text of the draft policy indicates that the SPD will be reviewed to ensure it is in line with national planning policy.

TR5 Safeguarding for Transport Infrastructure

- s) **HS2** – the various allocations to the south of Coventry have been considered in the light of the identified route for HS2. It does not directly impact on those allocations and in turn its delivery will not be affected by construction on the housing sites or associated infrastructure. This was confirmed by the County Council in response to a query about the potential capacity issues associated with both HS2 and Kings Hill construction activities occurring in the same area at the same time.
- t) The response from the County Council's Strategic Highways Team indicated that : -
- i. HS2 haulage impacts will be mostly outside peak periods
 - ii. The Hybrid Bill relating to HS2 delivery gives powers to stop projects within the vicinity which may impact on the delivery of HS2
 - iii. Delivery of the A46 Stoneleigh grade separated roundabout scheme is included in the Hybrid Bill. HS2 will be working with Warwickshire County Council and Coventry City Council to ensure the scheme can be delivered during the HS2 construction period. This will supersede previous proposals by HS2 to signalise the slip as HS2 construction traffic mitigation.
 - iv. Although the delivery of HS2 spans several years, peak construction will only span a proportion of this.
 - v. It is the responsibility of HS2 Ltd to demonstrate their impacts and to offer mitigation.
- u) The Secretary of State for Transport updated the Safeguarding Directions for HS2 Phase One in August 2016 to broadly reflect the land requirements set out in the Additional Provisions, which were deposited in Parliament between September 2014 and December 2015, subsequent to the deposit of the hybrid Bill in November 2013. Within Warwick District, any proposed or known tentative development within this safeguarding area is wholly related to the construction of HS2 or has emerged as a consequence of it, for example the replacement village hall at Red Lane, Burton Green.
- v) The policy echoes the national stance on HS2 by making it clear that development that would prejudice the delivery of the line will not be permitted
- w) **Kenilworth Station** – this scheme is now under construction – see section 6 above.

- x) **Park and ride** – please see section 7 above.

TR6 Safe Operation of Aerodromes

- y) There is a working airport at Baginton to the south of Coventry within Warwick District, and the major regional airport at Birmingham is around six miles away. As a result, the draft local plan includes a policy on the constraints of development in relation to these uses. Development that would have an adverse impact on the safe operation of these facilities would be resisted.
- z) The advice set out in Planning Practice Guidance identifies in paragraph 012 of the section on transport the importance of aviation facilities to economic and other activity. It cites the Aviation Policy Framework (March 2013) as a document that should be taken into account when policies are prepared. The Framework requires local planning authorities to consider whether land adjacent to such facilities needs to be safeguarded for future airport-related use, and to ensure that surface access is maintained when proposals for development are submitted.
- aa) The Framework also requires issues around safety to be considered through the use of public safety zones, which are areas of land at the end of runways at the busiest airports within which development is restricted. While Coventry is not classed among the busiest airports in the country, it lies close to a heavily built-up area and it is logical to ensure that development adjacent to it does not create or exacerbate unnecessary risks to the public or businesses.
- bb) The PPG also refers to paragraph 160 of the NPPF, which addresses the need for local planning authorities to understand both existing and future business needs and barriers to economic growth that includes a lack of suitable infrastructure.
- cc) The Council is of the view that the policy drafted covers the issues around safe development in areas around the airport identified on the Policies Map.

10. Are there modifications to these policies or the wider approach to transport infrastructure which are necessary for soundness?

- a) The Council proposed some modifications to policy TR2 in response to the Publication Draft consultation. These were submitted along with the Publication Draft Local Plan as document LP21. These modifications have not yet been the subject of further consultation. The proposed modifications are set out below.

Policy TR2

- i. To clarify that this applies to both residential and non-residential development, amend 1st paragraph of Policy TR2 to read:

All large scale developments (both residential and non-residential) which result in the generation of significant traffic movements, should be supported

by a Transport Assessment and where necessary a Travel Plan, to demonstrate practical and effective measures to be taken to avoid the adverse impacts of traffic.

- ii. To address the impact that access arrangements can have on heritage assets add a new paragraph after the existing 2nd para to read:

Any development that results in substantial harm to the significance of heritage assets as a result of traffic generation will not be permitted unless effective mitigation can be achieved. Where the harm to the significance of heritage assets is less than substantial, development will be permitted where it can be demonstrated that the benefits of the development outweigh the harm.