

**Coventry  
Local Plan  
Examination**

[www.coventry.gov.uk/localplan](http://www.coventry.gov.uk/localplan)

**Inspector: Rebecca Phillips** BA(Hons) MSc DipM MCIM MRTPI

**Programme Officer: Lisa Albrighton**

**T:** 024 7683 2634

**E:** [programmeofficer@coventry.gov.uk](mailto:programmeofficer@coventry.gov.uk)

Examination Room, Civic Centre 4, Much Park St, Coventry, CV1 2PY

## Coventry City Council

### Local Plan 2016 - Examination Statement

#### Hearing Session 10: Transport and Accessibility



## **Part 1: Transport Infrastructure and the Transport Network**

**a) The Plan stresses the importance of the provision of necessary transport infrastructure and transport improvements being in place to support development of the Strategic Urban Extensions (SUEs). Is there adequate detail about how this will be achieved set out in the Plan? Is this reflected as a priority in the Infrastructure Delivery Plan?**

The chapter clearly identifies infrastructure of “greatest significance” which includes:

- Keresley: Proposal for a new distributor link road
- Eastern Green: Proposed new grade separated junction
- Walsgrave: Proposed inclusion of a new blue light access linking the A46 to the University Hospital

The Infrastructure Delivery Plan identifies “Major highway Network Improvements” including major infrastructure associated with the SUE sites as “strategically essential”. This is the highest priority for delivery. This has been clarified further in our note to the Inspector (LP134).

As previously discussed at earlier hearings relating to the specific sites we have explained how the Strategic Model considered the impacts of development across the city as a whole having regard to localised pressure points and infrastructure options. Building upon this work further and with specific regards to the largest sites at Keresley and Eastern Green, additional work is being undertaken using the Coventry Area Strategic Model (CASM) to refine the quantum of development which could take place before the road infrastructure becomes essential. As previously expressed at the hearings it is anticipated that this will be early in the stages of development, but the modelling will help determine a suitable threshold and trigger point to support the wider developments in the longer term. This work reflects points 4:2 and 5:3 within the Examination Action Points.

At the time of writing this additional work is not yet completed but is scheduled to report in mid-September. As such it should be available by the start of the hearings and we will endeavour to provide it at the earliest opportunity.

**b) Would this be achieved? Does the Plan provide sufficient clarity about how and when the necessary transport infrastructure and improvements will be delivered?**

Further to our response to part A of this statement, we would reiterate that additional modelling is being carried out to refine the timing and/or phasing of

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essential highway infrastructure. Again this reflects points 4:2 and 5:3 of the Examination action Notes thus far.

This approach also reflects Policy AC3, which sets out the need for Transport Assessments and Travel Plans. Transport assessment for larger sites, such as the SUE's, will require more detailed modelling of each site to help determine the demand for travel (new trips), the impact of new development on existing networks, and any required mitigation. This process will help define in greater detail the infrastructure required and the timing of its delivery. Such detailed assessments are often undertaken at the point of planning application or in advance through pre-application discussion or scoping to ensure the most up to date information is fed into the modelling. Having reflected upon the discussions held in the first stage of hearings however we have sought to undertake the additional work now to reach an initial indication of when the specific trigger points will be in relation to the relevant highway infrastructure. We would expect this information to support an update of the IDP as well as support the expected preparation of a Master planning principle policy and/or a modification to the essential requirements section of Policy H2.

**c) Is there sufficient detail in the Plan regarding proposed transport modes and routes to serve the SUEs? Would the level of detail available facilitate the development of coherent master plans for these sites?**

Policy AC1 states that new development should "integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes". It is expected therefore that the SUE sites will be served by a range of transport options in order to facilitate a choice of travel modes for residents and visitors.

With regards to SUE sites, it is envisaged that existing bus services will be extended to serve those sites and where feasible the integration of the rapid transit network. Indeed we are mindful that site promoters at Eastern Green in particular have already confirmed initial discussion with bus providers about supporting the site.

The strategic cycle network would also be expected to serve the SUE's. In this respect we would highlight the Section 106 agreement relating to the first phase of the Keresley SUE (proposed by Lioncourt homes) which contributes towards the extension of the strategic cycle network.

Notwithstanding, whilst the plan is very clear about the need for all new development sites to be well linked to existing networks, the Council concurs that the plan is not fully explicit in some cases about the specific need to extend routes to serve SUE's, and therefore we propose to explore strengthening the

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relevant policies and supporting text to address this. In particular this will focus around the existing proposed modification on page 134 of LP4.

**d) Should the Infrastructure Delivery Plan identify the need for a new junction to provide access to the proposed Whitley Business Park extension?**

The existing Whitley Business Park has planning permission, with the majority of remaining land currently under construction. It did not include provision for a new junction other than the new access road alongside the Jaguar plant which is now served by a new grade separated junction on the A444 which opened in 2015.

Any further changes to the road network to facilitate new development, including the extension of Whitley Business Park to the site at Baginton Fields and any necessary new access junctions, will be addressed as part of the implementation of the Whitley South development which now has outline planning permission, see application OUT/2016/0405. It is not considered necessary therefore to include that infrastructure in the Delivery Plan as it is already committed.

**e) Policy AC3 'Demand Management' refers to the need for Travel Assessments and Travel Plans. However, the details will be set out in the proposed 'Coventry Connected Supplementary Planning Document' (SPD). Is the policy justified in the extent to which it relies on a yet to be produced SPD to define its requirements?**

Sufficient guidance is already available to facilitate the production of Travel Plans and Transport Assessments in the interim. However it is recognised that good practice guidelines can periodically change during the lifetime of a development Plan and there may be occasions where local circumstances require standards different to those published nationally. The production of an SPD allows additional technical detail to be published outside of the main Development Plan and provides an opportunity to bring together and refresh all existing transport guidance/strategy documents.

The government provides the following guidance which can be used to guide transport assessments.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/263054/guidance-transport-assessment.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263054/guidance-transport-assessment.pdf)

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The City Council provides guidance with regards to Travel Plans in the Delivering A More Sustainable City SPD 2009

Travel plans - cycle parking and accessibility technical guidance

[http://www.coventry.gov.uk/downloads/file/2700/travel\\_plans -  
\\_cycle\\_parking\\_and\\_accessibility\\_technical\\_guidance](http://www.coventry.gov.uk/downloads/file/2700/travel_plans_-_cycle_parking_and_accessibility_technical_guidance)

This document will be refreshed and merged into the proposed Coventry Connected SPD.

**f) Does the Plan provide sufficient clarity about how allocations will be subject to an appropriate assessment of the capacity of the existing highway infrastructure, the identification of any requirements for new infrastructure and how this will be delivered through the master planning process?**

Further to the points raised above it is considered that policy AC3 along with the supporting text provides adequate clarity around how new development proposals will be assessed in terms of their impact on the highway network. This is largely driven through the production of Transport Assessments at the point a planning application is submitted as it ensures the most up to date local implications can be measured.

As previously discussed, the allocations identified in the Local Plan and on the Policies Map have been subject to a strategic highway assessment using the Coventry Strategic Highway Model. This assessed the cumulative impact of development on the highway network. The outcomes of this work are set out in the evidence base and the Local Plan. The assessment tested various scenarios ("do nothing", "do something" and "do something 2"), which tested differing levels of mitigation. The outcomes of this work have helped to inform the necessary infrastructure which is set out in the Plan itself and the Infrastructure Delivery Plan.

**g) The Strategic Transport Plan for the West Midlands Metropolitan Area "Movement for Growth" sets out the overarching transport strategy for the area. Does the Plan's approach support this overarching strategy? If so, should this be more apparent in the Plan?**

The West Midlands Strategic Transport Plan is referenced in the Local Plan Evidence base for the Transport chapter. Policies in the Development Plan are consistent with those in the West Midlands Strategic Transport Plan.

The plan, which has now transferred to the responsibility of the West Midlands Combined Authority, is aligned with emerging work which is being carried under

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the Midlands Connect initiative which will form the basis of a transport strategy for the Midlands Engine. The initial findings of the Midlands Connect study are integrated into the Local Plan Transport chapter and steer policies relating to strategic connectivity. As such it supports a golden thread which runs through all regional and local transport policy. Whilst the Local Plan does not frequently reference the Strategic Transport Plan, many of the policies stem from it. For example, development plan policies which deal with strategic connectivity, such as rail/HS2 and rapid transit are consistent with those in the strategic transport plan for example, as is the need for new stations on the WCML and south of Coventry.

**h) Is there a sufficient level of detail in the Plan regarding the Bus and Rapid Transit system proposals and how major development proposals should make provision for those routes? Should the title of Policy AC5 'Bus and Rapid Transit' be amended to 'SPRINT Bus Rapid Transit' to conform to the regional Strategic Transport Plan?**

The plan sets out clear proposals for a rapid transit network which align with those in the West Midlands Strategic Transport Plan. The network is currently being developed based on the cloverleaf pattern set out in the Strategic Transport Plan and the Development Plan. Work is on-going to refine the detail and feasibility of the routes and phasing of delivery. This is also linked to the emerging devolution deal as part of the new West Midlands Combined Authority which makes provision to deliver a rapid transit network. The Plan refers to the "Sprint" Bus Rapid Transit Network within the main body of the text with very clear links to the West Midlands Strategic Transport Plan and therefore it is not considered necessary to change the existing title. The integration of the rapid transit network with new development will be considered in greater detail through the master planning process. It is however expected to link with new and existing highway provision, which reflects the existing compact nature of Coventry's urban form

We are mindful that there are a range of proposed modifications included in LP4 in relation to SPRINT. In light of on-going work at the Combined Authority level we propose to review these modifications as they are excessively detailed and risk dating the Plan.

**i) The role of Coventry's bus network will be set out in the West Midlands Integrated Transport Authority and Centro's 'Bus Network Development Plans'. How does the Plan align with this document and will it support the transport approach including improved bus priority measures, bus lanes and signal based schemes?**

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The Council are committed to working jointly with its regional partners as part of the Combined Authority. As part of this work we are actively engaged in understanding how this will relate to bus provisions across Coventry.

As part of this joint approach the Council are currently working with Transport for the West Midlands (TfWM), the transport arm of the West Midlands Combined Authority to ensure that the housing and growth needs identified in the Plan are taken account of when planning future public transport priorities and network requirements.

Furthermore and as already highlighted above, we have had full regard to work at the regional level in preparing this Local Plan and have sought to integrate its findings into the local policy framework.

As such, we have developed our Local Plan in this regard to be sufficiently flexible and be able to respond to any subsequent changes to regional transport guidance. As such, our focus has remained on promoting increased use of public transport, promoting the integration of routes with new development and to and from key trip generators as well as promoting an alignment of different transport nodes to create transport interchanges across the city.

## **j) How will the Plan facilitate delivery of the Cycle Coventry Cycle Network?**

The plan for the strategic Cycle Coventry network is well developed and deliverable. Early phases of the network have already been delivered in the north and southwest of the City. Additional funding is actively being sought through the Coventry and Warwickshire Local Enterprise Partnership to build further phases of the network. Policies AC1 and AC4 require that new development proposals incorporate new cycle routes and ensure that they are well linked into the existing cycle network. The Cycle Coventry network is identified as a "strategically desirable or locally essential" piece of infrastructure in the IDP. The Plan therefore provides an opportunity to enhance the coverage and quality of the cycle network.

As previously identified we have already secured Section 106 contributions as part of the Lioncourt application at Keresley (phase 1) to support the extended connectivity of the strategic cycle network

## **k) Should the proposed route of the North West Link Road be shown on the Policies Map?**

The precise route of the road is still under consideration pending further design work and on-going discussions with third-party landowners. It would not therefore be prudent to release an alignment which may be subject to

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modifications and could therefore cause unnecessary blight on surrounding land and property.

To provide greater certainty however the Plan is clear in relation to the key points of connection at either end of the highway. We are also mindful that 2 initial phases of the highway have been incorporated into the approved Lioncourt scheme and the proposed Barratt scheme.

**I) Are these policies effectively drafted to achieve their intended purpose and do they provide a clear indication of how a decision-maker should react to a development proposal?**

Yes. We consider that policies are clear in their intention and provide clear policy direction which will aid the decision making process. They have been founded on robust evidence and represent an appropriate policy framework to support sustainable transport choices over the lifetime of the Plan.

Notwithstanding there is 1 area where we have acknowledged a need for additional clarity, which relates to the timing/phasing of the 2 pieces of strategic infrastructure at Eastern Green and Keresley SUE's. We intend to integrate this additional clarity into our proposed modifications and previously discussed.



## Part 2: Accessibility

- a) The Plan suggests that a 10% reduction in single occupancy car use can be achieved through modal shift and behaviour modification. The proposed modal shift will be challenging given the scale of new development on peripheral sites and considering existing trends for bus and rail usage, particularly given the limited existing and proposed rail network. Is there sufficient evidence to support delivery of this modal shift over the Plan period?**

The proposal for a 10% modal shift from single occupancy car use to other more sustainable modes of travel is considered challenging yet achievable. The policies in the Plan and associated infrastructure set out in the IDP positively encourage the take up of sustainable travel modes.

It should however be noted that the strategic highway modelling exercise carried out using the Coventry Area Strategic Model assessed the impact of new development on the highway network on a worst case scenario based on current travel behaviour. In effect the model did not apply the 10% modal shift target, yet the model showed that increases in traffic could largely be mitigated without it.

The benefit of a 10% modal shift in policy terms are twofold:

- 1) Modal shift away from single occupancy car trips would further reduce incidents of delay and congestion on the highway network.
- 2) Social and environmental benefits in terms of improved air quality and more active travel promotes more healthy lifestyles.

The 10% modal shift is considered to be realistic being based on the anticipated level of investment in infrastructure, changing travel habits and other relevant targets. For example:

- There is evidence of increasing levels of homeworking in line with more agile, technology driven working practices,
- The West Midlands cycle charter sets a target of an increase in cycle mode share to 5% of all trips by 2023 and 10% of all trips by 2033, well above the 3% in the Local Plan.
- Walking is expected to increase in line with continued investment, for example, the large package of city centre public realm schemes.
- Rail use is expected to continue to significantly increase in line with recent trends for example; between 2008 and 2012 Coventry had seen the biggest overall passenger growth of any UK city with journeys up 80% over this five year period. Other initiatives such as the NUCKLE rail project, Coventry Station Masterplan and new stations on the north/south and east/west rail corridor and the construction of HS2 in 2026 are all expected to add to this increase.

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- The implementation of a rapid transit network and the recent adoption of the West Midlands Bus Alliance are expected to achieve an additional small increase in public transport usage.
- The City Council is also seeking increased levels of car sharing for example, through the Carshare Coventry and Warwickshire car share scheme.

## **b) Should options and details about how the planned level of growth will be served be left to the 'Coventry Connected' SPD or should those details be embedded in the Plan?**

It is considered that the Plan provides adequate detail and policy direction on which to base development control decision making. Additional technical details and strategies will be required to guide the detail and implementation of specific transport infrastructure; however the level of detail required will be beyond what could be reasonably be included within the main development plan. Including this detail within the Plan will only seek to create over complex and extensive policies containing excessive levels of technical detail which would inadvertently dilute the clarity of policies rather than aid decision making.

The Coventry Connected Transport Strategy SPD will bring together a range of mode specific strategies which will help to inform and add value to infrastructure investment. For example it will include a cycling and walking strategy, travel plans strategy and additional technical detail on the proposed rapid transit network. Locating this supplementary technical detail within an SPD also enables flexibility in terms of updating it.

## **c) Should the Plan refer to the proposed West Midlands Metropolitan-wide parking strategy? Will parking provision and pricing be aligned with the delivery of improvements to public transport, cycling and walking?**

The West Midlands parking strategy is not yet available so cannot be used to inform current parking policy. This document will be more focused around pricing and the provision of parking in major centres as opposed to car parking associated with new developments. It is anticipated that the authoring of the parking strategy will be similar to the Coventry Connected SPD which will also include a local parking strategy. This will provide the opportunity to ensure both strategies (strategic and local) are suitably aligned.

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## Part 3: Monitoring Framework

### a) Is the Plan sufficiently flexible enough to respond to changing circumstances and does it include clear and appropriate mechanisms for the implementation and monitoring of the Plan's objectives?

The Plan will be underpinned by a robust Monitoring Framework which will be used to monitor the implementation of policies and proposals contained in the Plan. This will directly feed into the Annual Monitoring Report (AMR) and, in turn, be used to inform any future Joint Plan prepared at a regional and/or sub regional level.

Targets, indicators and trigger points will be set out in the revised monitoring framework (appendix 8) which will provide a mechanism for ensuring the plan is sufficiently flexible to respond to changing circumstances. If particular targets are not met, trigger points will be activated and investigated in the Annual Monitoring Report to establish whether any further actions are required e.g. revision of policies or a review of the Local Plan.

The Council is prepared to make minor changes to the Monitoring Framework to ensure it provides the best possible mechanism to monitor and take advantage of evolving best practice. This reflects the Councils intentions to keep the monitoring framework under review as a live document to ensure it responds to changes in trends and national indicators.

Notwithstanding our view that the Plan is sound and robust and capable of delivering over the Plan period, this will also provide a solid basis for assessing whether a review is necessary in case of a significant change in circumstances or a drastic under performance or failure of a policy.

## Part 4: Any Other Matters

There are no other matters we wish to raise under this session.