

## **Warwick District Local Plan**

**Pre-Submission Publication draft May 2014**

### **Stagecoach Midlands Representations**

Stagecoach Midlands remains of the view that the Plan as currently drafted is unsound, as defined by paragraph 182 of the National Planning Policy Framework (NPPF). Following strong and comprehensive representations the Plan fails to meaningfully address the concerns we have raised.

The Plan is driven by land allocation and land-use considerations, with relatively limited thought given to the transport impacts, and means of effectively delivering mitigations. Indeed, the evidence base has post-dated the preparation of the development strategy. The work undertaken as part of the Warwick Strategic Transport Model, far from underpinning a strategy that is provably justified as being the most appropriate when reasonable alternatives are considered, instead leads to a great increase in peak-time traffic delays across large parts of the urban area. This particularly so in the area south of Leamington and Warwick, where current congestion is already serious, and where the vast majority of future development is proposed to be concentrated.

Paragraph 1.30 of the Plan acknowledges that the serious traffic congestion and air quality issues are a major problem that the Plan must address (Strategic Issue f).

We are, however, concerned that the strategy is not aligned with, nor cross-referenced to, the Local Transport Plan, which is under imminent review. In the absence of the Plan being conceived to protect and take advantage of the LTP strategy, no other clear structuring policies or strategy is put forward to allow development to be accommodated, on the scale required, without giving rise to increased congestion, pollution and environmental problems.

Given the baseline situation, with above average levels of congestion, the Plan fails to consider, protect and take advantage of the opportunities for public transport as required by NPPF. Without provision for public transport playing a much greater role in meeting the travel needs of the District, the Plan can only be expected to deliver development that is at least as car-dependent as recent development south of Warwick and Leamington.

The strategy does not appear to seek sustainable development through locating and designing development in such a way as to deliver and take advantage of a step change in the quality and availability of sustainable travel modes, and public transport in particular. Little, if any, attempt has been made to examine or define the kinds of public-transport- focused schemes, including bus priority, that would significantly boost the quality, efficiency and attractiveness of bus services, and achieve the significantly higher mode share for bus services, that would be necessary to mitigate the impacts of additional traffic, especially south of the urban area.

The modelling undertaken to date by Warwickshire County Council (WCC) within the Warwick Strategic Transport Assessment (WSTA) appears to assume current bus mode shares, given that S-PARAMICS cannot model mode shift or dynamically reassign journeys between modes. Even now, over 2 years after the initial modelling was undertaken, the scope of the studies has not been

broadened to look at alternative approaches, or mitigation strategies, where sustainable modes including public transport, are the focus of measures aimed at achieving much higher mode shares both from new development, and for the forecast increase in travel demands from the current baseline population.

There has been little attempt by WDC to engage with Stagecoach Midlands as the area's leading local public transport operator, to facilitate changes to the plan strategy to be shaped to deliver development where public transport can credibly provide for a much greater proportion of travel requirements than today.

This is contrary to NPPF, which requires that Plans are positively prepared with a duty to co-operate, not only with neighbouring authorities, but "private sector organisations". As the vast majority of local public transport is commercially provided by Stagecoach Midlands, we are disappointed that our advice as to the appropriateness, effectiveness and deliverability of matters relating to developing and improving bus services to support the overarching LP strategy, or specific development allocations and proposals, have only been sought to a very limited degree. To the extent that we have provided, on our own initiative, such advice as part of duly-made representations at previous stages in plan-making, it is disappointing to see so little evidence that this input has been used to make the draft plan more sustainable.

Stagecoach Midlands would also point out that WDC has to have due regard to engage with neighbouring authorities on cross-boundary issues that concern all aspects of plan-making, not least infrastructure requirements that concern transport. It is evident that the District has particularly close functional linkages, particularly with regard to employment and journeys to work, with neighbouring authorities, and the City of Coventry in particular.

The existing University of Warwick Campus straddles the District boundary, and an existing consent for a major expansion and intensification of uses will generate further trips to and from the District's main settlements. Stagecoach Midlands operates a highly-successful Unibus service, running up to every 5 minutes between Leamington and the Campus, and other services to Coventry, to serve these demands. Considerable patronage growth has been achieved on these services in recent years. There has, however, been a lack of consideration as to how the attractiveness, efficiency and capacity of these services could be built upon by specific targeted measures. Among the obvious options, previously put forward, would be the establishment of a Park and Ride site on the northern approaches to Leamington, taking advantage of counter-peak flows on our University of Warwick route, where extremely high frequencies are already offered, and spare capacity exists.

The future development of the strategic employment location at Coventry and Warwickshire Gateway, near Baginton is also very significant. This will give rise to considerable travel demands, many of which will be cross boundary and which will, as the Transport assessment accompanying the application makes clear, require significant mitigations involving public transport to prevent unacceptable impacts on the National Primary road network, as well as local roads and communities. A clear opportunity exists to leverage the funding necessary for the public transport measures anticipated for this development, and to further improve public transport links to the east of the A46, and the broader Leamington-Gateway-Whitley-Coventry corridor.

Notwithstanding the comments made at para 1.28 of the Plan that the District has co-operated with the County Council regarding strategic infrastructure planning, it is the case that WCC has not made provision for improved public transport infrastructure or bus services.

The strategy outlined relies on infrastructure being delivered which, as the Infrastructure Development Plan (IDP) makes clear, essentially consists of packages of highways-based works that attempt to provide, as far as possible, for the very high levels of car-borne traffic to which the Plan gives rise. The plan-making process is characterised by an “allocate then accommodate” approach. WSTM at every stage, including Phase 4, reveals that even if these schemes are delivered, traffic conditions can be expected to materially worsen. We note that peak queue lengths, even with mitigation in place, will in many places increase by 30-50 vehicle lengths (WSTA phase 4 section 1.6).

The impacts of such an outcome on existing bus services would clearly be significant, as has been explained in full in previous representations.

Moreover WSTM Phase 4 explicitly states at section 1.9, that the mitigations considered are “relatively high-level in terms of design and feasibility” This phrase recognises the fact that they are relatively weakly defined, and thus relatively difficult to evaluate in terms of achievability, effectiveness, and cost. Not all of the mitigations even feature in the IDP. The Plan is, therefore, inconsistent with the requirements of NPPF.

In order to comply with the statutory tests of soundness outlined at paragraph 182 of NPPF, the Plan needs to meet objectively assessed infrastructure requirements arising from the strategy, consistent with the principles of sustainable development. This does not, however, appear to be the case and in our view the Plan is unsound.

Despite the work undertaken through WSTA to date, the potential for sustainable transport improvements, has still not been undertaken. This is made clear by the recommendations of WSTA Phases 3 and 4. Stagecoach Midlands notes, too, that WCC’s specialist consultants conclude at page 7 of WSTA phase 4, that “it is critical that sustainable transport improvements form part of the mitigation package for housing and employment growth proposals...”. The Company also note that the phase 4 report finds at section 1.6 on p 6. that the “areas where the most severe increases (in delay) occur, appear to be in regions where there is potential to further optimise the proposed mitigations to overcome the issues.” In other words, the reasonable alternatives, merely to accommodate the plan strategy, have not yet been defined fully, nor optimised or tested sufficiently robustly to allow an examination to conclude that the Plan represents the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence. The Plan, therefore, once again appears to be unsound.

It is not clear even that the currently identified schemes within the IDP can be delivered. The Draft Infrastructure Plan was prepared to support a previous Plan Strategy which the current Plan supersedes. The final WSTA Phase 4 which tests the Revised Development Strategy (RDS 2013) and the cumulative impacts of the proposed allocations was published in April 2014, well over one year after the RDS was prepared and consulted upon; and little more than six weeks before this current consultation opened. It is questionable if the LPA can deliver “Managed Motorways”, or Hard-shoulder Running (HSR) on the M40 as it is not programmed, and demands a level of funding that

seems highly unlikely to be borne by development. This issue also undermines the soundness of the plan.

### **Final Comments**

Stagecoach Midlands is very aware that land-use planning must resolve a very large number of conflicting objectives and interests, to the ultimate benefit of the community.

The Company also recognises the particular challenges involved in today's economic climate, and equally respects the plan-making efforts sustained by both Councils and other stakeholders over a very considerable period to date, that have led to the current proposals.

We trust that Warwick District Council and Warwickshire County Council recognise that we remain very willing to play an active and constructive role in further shaping the Development Strategy, as key stakeholders in securing sustainable development now and into the future.

Stagecoach Midlands are committed to maintaining dialogue with the two Councils, developers and their respective specialist consultant teams as required, to assist in achieving the optimum development strategy for Warwick District over the next 20 years, and to help ensure that the objectives of sustainable development are met both through the formulation of the statutory development plan, and in the detailed design of the development proposals.

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