

# Warwick District Local Plan

## Further Proposed Modifications

### Observations and Representations on behalf of Stagecoach Midlands

#### 1. Initial Observations on the Current Local Plan Position

Stagecoach Midlands has duly made representations to the Draft Local Plan at a number of stages in its genesis to date.

In broad outline, Stagecoach has made representations that it considers that:

- The evidence base concerning the transport impacts of the Plan Strategy has followed both the evaluation of both the overarching strategy, and its specific allocations, rather than led it, as it properly ought for the Plan to provably represent the best approach when all reasonable alternatives had been considered.
- The evidence base (in particular the Warwick Strategic Transport Assessment phases 3-4) makes clear that residual traffic impacts at peak times could remain significant, to the point of being severe, in a number of places at the Plan horizon date of 2029 even assuming all the identified mitigations were to be brought forward.
- There is insufficient evidence before the Examination to suggest that the full list of proposed transport interventions in the Infrastructure Delivery Plan is either affordable, or indeed necessarily all technically deliverable. It is clear that to avoid very serious deteriorations in traffic conditions, affecting all road users but bus services in particular, a significant shift in transport mode distribution at peak times will be required, but the Plan at its submission made no provision for this in Policy or in terms of a comprehensive suite of specific projects and interventions.
- That the Plan at submission was unsound inasmuch as the Plan allocations did not demonstrably represent the best option for development, when all reasonable alternatives have been considered. In particular draft allocations south of St Fremund's Way Whitnash, and those proposed well to the south of Harbury Lane, including the Sewage Treatment Works and land south of Grove Farm, were of concern to Stagecoach. Stagecoach notes that Grove Farm now represents a commitment. Given that it now seems likely that this will take place in any event, it makes sense for the STW to come forward in the interests of comprehensive development and delivery of a seamless bus route through the whole area.
- That the Plan at submission was unsound inasmuch as opportunities for sustainable transport have not been fully identified and taken up. The omission to date, of a northern Park and Ride has been a particular area of concern. The Southern Park and Ride was not accompanied by any proposed bus priority measures that would allow it to perform its intended function.

Since the date of our representations, a considerable amount of movement has taken place.

Firstly, the vast majority of the Strategic Allocations, in the Growth Focus South of Warwick, Leamington and Whitnash, have been consented as departures from the currently Adopted

Development Plan. We note that this is now referred to by Warwick District Council (WDC) as the Strategic Urban Extension South of Leamington Spa and Warwick (SUE).

Stagecoach recognises that WDC as Planning Authority, and Warwickshire County Council (WCC) as Transport Authority, have made significant efforts to pull together these disparate promotions within the SUE into a comprehensive scheme. This has been done through the preparation of an overarching Master Plan, the preparation of a comprehensive Design Guide for the Strategic Urban Extension finalised on 25 Jan 2016; and the application of a locally-focussed transport mitigation strategy that attempts to align contributions and highways interventions having regard to the wider strategic quantum, as far as the constraints of piecemeal submission and determinations have allowed.

As a result, all but about 275 of the 3200 or so dwellings previously envisaged in the Submitted Local Plan for the Southern Growth Focus are now committed, and indeed are being delivered at a rate that is notable for its speed, across 7 active housebuilder outlets. In due course it seems probable that this number will rise, to perhaps as many as 10-11 active outlets. Stagecoach concludes that high rates of delivery are both feasible and sustainable over the next few years in this area.

Stagecoach welcomes the developers' and WDC's joint master planning efforts to provide a suitable bus route through the SUE, along what is termed the "Community Spine Road" (CSR). Stagecoach has had some input into this process. We note and welcome the explicit attention paid in the design guide for the SUE to the need to ensure efficient bus routes are provided along the CSR and, equally, Harbury Lane and Europa Way. However, to our concern, the "Garden Village" urban design approach, means that the CSR within the SUE will take the form of a relatively narrow suburban street, 6.1m wide. This would be adequate, were off-carriageway parking bays also to be provided. While generous verges are required by the Design Guide, the first consented reserved matters within Lower Heathcote provide for no parking off-carriageway, and therefore this section at least of the CSR will in all probability be blighted by extensive on-street parking.

Stagecoach would point out that the Community Spine Road will extend over 4km from end to end from Grove Farm, through the former STW, Lower Heathcote, land South of Gallows Hill, and turning north to run through land West of Europa Way to just south of the Leamington retail park roundabout. The degree to which on-street parking on the CSR hinders buses making efficient progress along this road will have a material impact upon both the quality of service that can be offered, and its attractiveness. It is hoped that future reserved matters will take care to ensure that the approach to parking provision fronting the CSR will deliver a clear carriageway as far as possible, in both directions.

It is not intended either to offer virtual bus priority (for example by the introduction of one or more "bus gates" on the line of the CSR), to facilitate rapid and efficient bus circulation through what is an extensive area.

Secondly, two major developments accounting for a further 1385 dwellings that have not formed part of the Submitted local Plan strategy, have now been consented at Appeal as departures. These, at The Asps and South of Gallows Hill, were previously considered as potential allocations in earlier drafts of the Local Plan.

Stagecoach welcomes the certainty that the consent at The Asps offers as to the delivery of the proposed Park and Ride site south of Warwick. This is something we have consistently supported. However if it were to function as a “virtual Park and Ride”, as originally envisaged, the Southern Park and Ride site now fixed at The Asps is somewhat to the south of the perfect location, closer to Gallows Hill, which could lie just off the Community Spine Road and allow the site to be served by passing buses also serving land at Lower Heathcote and beyond. Again, this is regrettable.

These appeal sites also add to the housing tally already consented, and some other smaller schemes within the area, such that over are now 4500 dwellings committed in the Southern Growth Focus: a considerably higher total than had been modelled in WSTA up to Phase 4, and further adding to the travel demands that need to be accommodated, in an already very congested area.

Finally, Stagecoach notes and welcomes Warwickshire County Council’s work with stakeholders, including Stagecoach, to prepare a new Warwick and Leamington Spa Transport Strategy (WaLSTS)<sup>1</sup>, recognising that both existing problems and the demands of new development require a fundamental change of approach, and is likely to demand a concerted mode shift and travel demand management approach, supported by a suite of policies and specific projects to achieve specific outcomes. The WaLSTS output report in January 2015 set out a number of Local Transport Objectives (LTOs), and was accompanied by a separate WCC Report, *WDLP: Transport Proposals in Key Corridors*, that collates and synthesises the potential schemes from that Study, with those already in the Draft IDP informed separately by the WSTA. This, we understand, has in turn informed a revised Draft Infrastructure Delivery Plan (IDP) published in February 2016 that helps underpin the Draft Local Plan and the Proposed Modifications.

To the extent that WaLSTS (prepared after submission of the Plan), recognises the need to achieve significant transition towards more sustainable modes, and posits some specific ways to achieve this, at the same time as the WSTA-generated mitigations are that much the more specific and refined, the Draft Local Plan is at this time considerably better supported by the evidence than it was when Stagecoach made its previous representations. This offers some meaningful comfort to Stagecoach.

However it is also evident that the suite of mitigation proposals is neither entirely comprehensive, or fully takes account of either the additional development that the Plan makes provision for. WaLSTS measures are heavily focused on the southern part of the urban area, reflecting the previously submitted Plan strategy, and there is little sign of an overarching network-based strategy. Rather the Transport Strategy reads much more a series of discrete corridor measures, or at times, relatively small-scale standalone schemes. The chronic difficulties in the town centres are still not the subject of any specific measures, and given the clear constraints on providing additional highways or junction capacity, it is rather disappointing that even after so many years, a clearer lead is not given by WaLSTS. The vision and narrative still requires considerable development.

It is hard to see how a bold vision to address peak period use of private cars in and around the town centres in particular, can be avoided if meaningful progress is to be made. A bold vision will need to be accompanied by judiciously-considered but equally bold measures.

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<sup>1</sup> Examination Document reference TA01

Nevertheless, broadly speaking, the Company is considerably happier that the scale of growth proposed, and the Plan Strategy, can be accommodated in such a way that the reliable and effective operation of existing commercial bus services is rather less likely to be threatened. Additionally, proposals are now emerging that give reasonable grounds to believe that substantial improvements to the scope and quality of the bus service offer can put in place to support a significant mode shift towards public transport, in line with the Local Transport objectives of the WaLSTS, and the Plan itself.

A number of specific queries and concerns about the Plan Strategy, and its delivery, nevertheless remain. Stagecoach is keen to continue to work alongside promoters and the two Councils, and applicants in due course, to ensure that the objectives are indeed secured, by the refinement of existing proposals, and, where necessary and appropriate, new measures need to be brought forward.

We continue with our more specific commentary and observations on aspects of the Plan and the transport evidence below, before making our more specific representations in the required format afterwards, tied to specific Proposed Modifications.

## **2. The Proposed modification to the Warwick District Local Plan**

The Plan has been prepared, having in effect to run to keep up with a set of goalposts that have been constantly moving, as evidence has been brought forward or updated, particularly on housing need. Stagecoach recognises that the objectively-assessed need for housing (OAN) needs to be met, and equally understands that meeting unmet need from outside the District has not been a sudden requirement placed on the Planning Authority.

However, it is at a very late stage in the Plan-making process that the quite substantial additional quantum arising from the City of Coventry's requirement is now to be planned for, and it is of considerable concern that in so doing, before the Transport Evidence underlying the submitted Plan had even been examined, that what amounts to a very radically altered Plan Strategy is now required.

On the other hand, Stagecoach also recognises that the hiatus afforded by the suspension of the Local Plan Examination has allowed a significant amount of additional transport-related work to be undertaken, and this opportunity has been taken up. Specifically:

- Alongside the Final Phase of WSTA, evaluating the additional proposed allocations, further Addenda have been produced to WSTA Stage 4, evaluating the Impacts of the South of Warwick SUE, and the impacts within the Plan area of proposed development in Stratford-upon Avon District.
- The Warwick and Leamington Spa Transport Strategy (WaLSTS) has been prepared.
- Finally, the Draft Infrastructure Delivery Plan (IDP) has been brought up-to-date, with a fourth draft version dated February 2016.

Stagecoach recognises that the additional quantum arising from the Coventry Unmet OAN rightly and properly needs to be allocated as close as possible to where the need arises. This is sound planning, not least because it reduces the need to travel, and the overall length of mileage involved

with those journeys that do need to be taken. This begs the allocation of strategic sites adjoining Coventry, currently in the Green Belt, in the far north of the District.

Stagecoach also recognises that some of the largest and fastest-growing employment generators in the sub-region lie in this area, at the University of Warwick, Westwood, and at JLR Whitley. Further significant concentrations of employment exist at Stoneleigh, which are likely to grow in importance. It makes sense, *prima facie*, to ensure housing to meet the needs arising from this economic growth are provided as close as is possible to these employment clusters.

However, again as with the Southern Growth Focus, such a strategy fundamentally conflicts with the problem of acute peak traffic congestion across the highway network between Leamington/Kenilworth and Coventry, which arises to a great extent from the historic and ongoing economic vitality of the locality. Stagecoach notes the findings of the WSTA Final Phase work (WSTA (F)), and the comments at paragraph 2.12, that summarise the capacity of the area to accommodate new development before the local network is severely compromised. This amounts to just 435 dwellings. It is clear that without a very significant and immediate investment in transport infrastructure, anything more than the most modest amounts of development will lead to a further substantial deterioration in peak journey times and reliability.

Unlike the vicinity of the Southern Growth Focus (now referred to by WDC as the Sustainable Urban Extension South of Warwick and Leamington (SUE)), where bus services are relatively limited, a very high proportion of Stagecoach's current local network mileage is operated in the area between Leamington, Kenilworth and Coventry. This includes the Unibus service, running up to every 5 minutes between Leamington and the University of Warwick at peak times during the University term. It also includes the X17 running up to every 15 minutes between Leamington, Kenilworth and Coventry, and the express X18, which is about to be refocused into an enhanced premium inter-urban service operating generally every 30 minutes between Coventry and Stratford via Leamington, Myton and Warwick. Significant services are also operated by other bus companies.

Major development now anticipated by the Local Plan at Westwood Heath and Finham/Kings Hill alongside aspirations to develop Stoneleigh and land south of Whitley, will demand new public transport links that today do not exist. The existing serious highways congestion across the southern flank of Coventry, as well as relatively long distances between these sites and several likely major destinations, mitigates strongly against such links being deliverable without significant highways and junction improvements on the one hand, and pump-priming revenue support on the other.

Stagecoach has for some time been faced with the serious daily disruption caused by significant major highways improvements on the Strategic Road Network (SRN) South of Coventry, both on the A45/46 at Tollbar End and on the A444 at Whitley. Services have been further disrupted by simultaneous major works within Coventry City Centre and its approaches. The capacity these will provide is welcome and overdue, and we hope it will provide a significant amount of headroom to cater both for background traffic growth as well as the development proposed by the Plan.

The approach to be taken to address current and forecast issues away from the SRN, around Gibbet Hill, the Stoneleigh Interchange and on other links either side of the A46, now need urgent focus. Stagecoach notes and welcomes the attention paid by modelling in WSTA (F) to these matters. However the level of definition of solutions is low, while the focus remains resolutely on highways

capacity, without much if any real focus on how far mode shift can be facilitated, not least to find ways to avoid extremely costly and environmentally damaging highways works, which by their nature take a very long time to progress to final delivery.

More worrying yet, many of the localised impacts of the Westwood Heath and Kings Hill proposed allocations will arise, no doubt, outside the District within the City of Coventry. It is rather unclear to us how far existing Transport plans and strategies within the City currently facilitate a seamless cross-boundary approach to mitigating these impacts. This is of prime importance given the interaction between the District and Coventry, that the Plan Strategy will only tend to further intensify.

There are some significant further policy changes within the Southern Growth Focus.

The most notable is the Strategic Education Allocation at Myton. This location is already the focus for secondary education serving most of Leamington and Warwick south of the Avon. Stagecoach now understands that the concentration of education provision here will substantially increase. The catchments for this provision will of course include the SGF allocations which in and of themselves are of a scale that demands capacity equivalent to a full new 8FE Secondary School. These requirements add to those of the existing site which has a catchment extending away to the east towards Whitnash, much of which is not within comfortable walking, or even cycling distance. The site is next to the Warwick School, itself drawing day pupils from a wide sub-regional hinterland, and also adjoins the Technology Park, which again, generates its own very significant inbound daily flows. Localised congestion is already to a great extent the result of traffic accessing these sites. Therefore, to avoid severely aggravating existing problems, the access strategy for the education campus, which is going to become one of the largest school sites in England, will need extremely careful attention. This has yet to be addressed by the Plan.

The allocation of the Appeal sites south of Gallows Hill and at the Asps, brings with it committed provision of a 500-space Park and Ride site on a site at The Asps. This now appears in the Draft IDP. Contrary to the assumptions in the Draft Plan, this is now, it appears, to be served by a “bespoke” service: the only revenues that will be applicable are those arising from use of the P+R site, and from residents of the The Asps. A very long financial support period has been assumed by the applicant. Stagecoach will make no further comment on the appropriateness of this, and its financial viability in its own terms. However, it should be obvious that the potential synergies anticipated between this P+R provision, and the provision of public transport serving the wider SUE, has thus apparently been precluded. This is of significant concern to Stagecoach.

However, whether or not a bespoke dedicated service is the ultimate operating model, or the Virtual Park and Ride concept that WCC and Stagecoach have favoured, any Park and Ride provision can only be effective if buses are not subject to congestion on the routes into the town centres. Without effective and comprehensive bus advantage, there will be virtually no obvious reason to use the P+R provision at all.

Stagecoach remains concerned that The Plan and the supporting IDP if anything assumes that the stretch of Community Spine Road running north through Myton Garden Suburb (land West of Europa Way), far from being a bus priority corridor as we have proposed, is actually anticipated to act to some extent as a relief route for a (dualled) Europa Way. If, as the District Council’s

overarching Master Plan and Design Guidance for the SUE suggests, this road is only 6.1m wide, with frontage access, it seems quite likely that the conflict between its “place-making” and “movement” functions could become sufficiently problematic as to make it a far from attractive bus route, much less an appropriate road for a Park and Ride service to use.

### **3. Stagecoach commentary on the Warwick Strategic Transport Assessment (WSTA), and the Final Phase (WSTA (F))**

Stagecoach recognises that WSTA is founded on an established Micro-simulation suite (S-PARAMICS), and that the Model has been built, validated and refined progressively over a significant period by technical specialists, employed within WCC and its consultants. As with any model it will have limitations. However, Stagecoach accepts that over the period that the Model has evolved, the number of model runs and adjustments will have generally led to a relatively high degree of confidence being attributable to its outputs.

Stagecoach also understands the explanation at para 5.10 of WSTA (F) that certain model runs might “lock up” for a number of reasons, and this does not necessarily indicate that the network as a whole will do so, in practice. Equally, Stagecoach notes, understands and generally supports the contention that as specific mitigation schemes are designed and refined to a higher degree alongside actual development proposals (generally as part of Transport Assessments for major planning applications) the stability of strategic transport models such as WSTA improves notably. Stagecoach therefore accepts that there is some comfort to be derived that as development proposals are brought forward, further practical mitigation benefit might well be achievable. It is for this reason that Stagecoach is prepared to accept that a degree of “hope value” can be ascribed to measures that are not yet fully defined in detail within either proposed IDP schemes, or more localised highways improvements that will be brought forward with planning applications.

WCC and the WSTA consultants place a great deal of reliance, nonetheless, in the efficacy of schemes that have yet to be fully worked up. On top of this are measures that arise from the Atkins Warwick and Leamington Spa Transport Strategy, that reported in January 2015, after the Plan was submitted, but that has informed a revised Infrastructure Delivery Plan (IDP) in support of the Local Plan.

Indeed, this confidence is particularly marked in respect of the town centres, where, particularly in and around Warwick, chronic problems currently exist, that to date have defied solution, or indeed allowed for consensus to be reached on a strategy to address it, for many years. This is despite a great deal of time having been spent preparing technical appraisals and various transport projects to resolve the difficulties, over at least the last 15 years. None have been implemented to any great degree.

WSTA (F) appears to consider that the overall strategy across the Plan area ought to avoid unduly aggravating town centre congestion issues, and that a number of measures are emergent or likely to be identified in and approaching town centres, such that the Plan can go forward without concerns that conditions will markedly deteriorate (WSTA(F) paras 4.30-4.38). It is very hard for Stagecoach to gainsay this logic, but given the nature of the problems and the long history of abortive projects to solve them, Stagecoach remains very concerned indeed that the Plan is likely to be adopted based

on a number of assumptions as to what is achievable, without a great deal more evidence being available.

At the very least, the Plan needs to put a very clear and focused timescale on stakeholders to establish what the town centre access and movement strategies should be. Stagecoach considers that it is important that the Plan itself makes clear, in Policy, that such strategies need to be identified and brought forward early in the post-Adoption period, and we would suggest, within 2 years.

Even with the significant additional work undertaken, the evidence base set out in WSTA to date is still, in its own terms incomplete, across a much wider area beyond the town centres. As para 4.53 of WSTA (F) admits: *“What the work does not identify, at this (Final) stage, are smaller, localised impacts that are not identifiable either due to the strategic focus of the work to date or the coverage of the model”*.

It is precisely these kinds of localised impacts that, day-to-day, contribute to serious delay to bus services, especially at peak times. Not only that but such issues can often be highly intermittent and hard to predict. Many are seriously affected by flows related to car journeys to and from school sites. The result of this is journey times that are impossible to schedule for. Reliability is one of the essential conditions for sustaining and increasing the attractiveness of bus services.

Stagecoach urges that momentum is sustained in establishing what these localised impacts will be in order to prepare mitigation schemes for implementation alongside the Plan and where possible, funded and delivered alongside development.

In particular Stagecoach notes that impacts of the proposed additional allocations at Coventry and Kenilworth on the wider network between Kenilworth and Coventry are insufficiently understood (para 4.53-4 of WSTA (F)). Nearly all the links and junctions described as coming under more or less pressure, are either used today by regular bus services, or are likely to be if development takes place as proposed in the revised Draft Local Plan.

While Stagecoach is rather happier that the transport evidence base and mitigation strategies have moved on significantly, the Company is far from satisfied that potentially serious outcomes are provably all avoided. The Results Summary of WSTA (F) admits that the model is clear that traffic demands assigned from the LP Revised Development Strategy, plus the New Sites that are the focus of this consultation, are likely to lead to an increase in journey times: *“overall, it can be assumed that there will be a general increase in the average time spent travelling on the network once the allocated demand has been assigned to the network.”* (para 6.10)

Stagecoach recognises that the impact of mitigations will no doubt alleviate much and in some cases all of the delay in specific localities. Nevertheless, the implication of Policy is clear. Only through a comprehensive and consistent application of measures to significantly dampen demand for personal car use, can the growth required by the Plan be achieved, without serious consequences for quality of life and business costs.



Bus priority, across the Plan area, represents one of the most obvious and provably effective means by which growing demands for movement can be sustainably accommodated. The bus network already presents opportunities to achieve significant mode shift, by virtue of high frequency services that align with key movement corridors. This potential is frustrated by the lack of any meaningful advantage for buses in congested parts of the network, despite the fact that a double deck bus can accommodate, in the same roadspace as three private cars, up to 80 seated passengers.

Stagecoach notes and welcomes the recognition in WaLSTS and implicitly in the Draft IDP, that demand management and mode shift need to be pursued. However, the Plan itself is insufficiently explicit in itself aligning with these emerging policy themes. Demand management and mode shift cannot just sit as concepts, hidden discreetly in supporting documents behind the Plan: they need to be explicit within it.

The modelled increase of a further reduction in average speeds across the Plan area of 20% (am peak) and 15% (pm peak) has serious implications for any bus company (WSTA (F) para 6.12. To maintain even existing levels of service will require 25% more buses and staff, as the current fleet could only achieve 80% of the mileage currently operated. It is hard to see how all things being equal, that 25% extra patronage could be attracted to such services to pay for this extra resource, especially if journey times also become that much more unreliable, as well as generally extended.

It should be clear to WDC and WCC, and other stakeholders, that if buses are even to maintain their current role, bus priority is simply not an optional extra. It needs to take centre stage, with a “cast” of other sustainable transport measures, across the Plan area, and across the boundary with Coventry City. The IDP takes welcome steps in this direction. Stagecoach notes and welcomes the admission that the mitigation measures in support of the Plan need further work and refinement.

It is important that the political imperative to take bold steps to reduce car dependence are not ducked, but consistently and steadily progressed over the life of the Plan. WCC has spent years and aligned funding streams of millions of pounds, to deliver a single new rail station at Kenilworth as part of the NUCKLE 2 scheme. Currently there is no bus priority of any kind available to operators within Warwick District. Were this amount of political energy to have been directed in support of bus advantage measures, strategically targeted in key corridors, buses would no doubt be delivering radical increases in trips and mode share, conceivably as high as the greater than 20% points mode shift towards bus use in the A32 corridor between Gosport and Fareham arising from the Busway.

#### **4. Stagecoach Commentary on the Revised Mitigation Strategy and Infrastructure Delivery Plan schemes**

As we have commented previously in section 1, there is now a great deal more detail on the mitigation measures proposed in support of both the Submission Plan allocations, and the additional allocations proposed in the proposed Main Modifications. These measures are also focused on key corridors and nodes, which gives Stagecoach some confidence that a holistic approach is being pursued, and that the resulting impacts can be improved by the way that each can operate synergistically within the corridor strategy.

For example, the employment of SCOOT and MOVA traffic signal technology on successive junctions, triggered by on-bus transponders, alongside sections of bus lane approaching major junctions, could go a long way to creating a comprehensive bus advantage scheme on a given corridor.

As a result of WSTA4, WSTA (F), WaLSTS and the resulting WCC Transport Proposals in Key Corridor Report in January 2015, Stagecoach notes that the list of highways schemes referred to in WSTA (F) is even more extended, while the revised Draft IDP is also that much the more comprehensive.

However, it is also very clear, when the full suite of evidence is read, that work to identify mitigations for the major new developments in and around the north of the District is still at a very early stage. This is hardly surprising. The brief for work to produce the WaLSTS was issued when only the Revised Development Strategy was known, and well before the matters raised by the Inspector in his initial findings after the Stage 1 Examination in Summer 2015. The sustainable transport measures specified in any detail in WaLSTS really only relate to the Southern SUE.

It is therefore clear that a great deal more work needs to be done to work up proposals to address the mitigation challenges thrown up by the latest WSTA modelling.

Stagecoach offers its comments on those measures so far proposed in support of the Plan, which in turn informs our evolving views on the Proposed Modifications to the Local Plan in the order set out in the WCC Transport Proposals in key Corridors Report. We draw on the further details offered in the Revised Draft IDP, which, being a much more recent document, also elaborates on the nature of the proposed measures.

#### **4.1. General IDP Public Transport Provisions**

##### *4.1.1. Heading T4- Bus Infrastructure, General*

Stagecoach notes and welcomes that a general category is provided for.

Roadside infrastructure for bus services is highly variable in quality, both within the urban areas and beyond. A consistently high standard of roadside infrastructure is important to signal the availability of services, and help create the impression that bus services are a credible travel choice. Consistent approach to infrastructure greatly streamlines the provision of high-quality roadside publicity, that will remain an important source of public information both for regular and potential new or occasional users, even though digital devices and web-enabled information is rapidly broadening the scope and quality of information.

Stagecoach notes and welcomes reference to the IHT 400m standard for distance to bus stops from residential properties, while also wishing to make clear that simple, easy to understand, frequent and reliable bus services are much more likely to develop high mode shares for bus than a diffuse network of less frequent services. There will be instances where a slightly longer walk to nearest stops is preferable if this means that a single high-frequency corridor can be sustained.

Stagecoach notes with some concern, that although the category is ascribed “Critical” status, no sums are apportioned. A budget sufficient to ensure that all stops within the urban area and then on on key inter-urban corridors are provided with DDA-compliant boarding platforms/dropped kerbs, and a flag with integral timetable case, should be provided for in the IDP.

Shelters are very welcome, but in reality they are likely to require stewardship by the local parish or Town Council, if their maintenance cannot be funded by advertising. Within and adjacent to development, they might be retained under the management arrangements for the public realm and open space.

#### *4.1.2. Heading T5; Bus Services, general*

Stagecoach notes, welcomes and endorses the logic and the proposed approach. It is always more advantageous to add bulk demand to existing services as far as possible, increasing frequency and, where appropriate, modifying or diverting routes where excessive additional circuitry can be avoided.

Stagecoach notes and agrees that a 15-minute target minimum frequency is the appropriate level at which the service offers a degree of flexibility that starts to become a credible alternative to personal car use. Ideally, in an urban context, a higher “turn-up-and-go” frequency, of every 10 minutes, allows for potential customers to dispense with referring to a timetable. However in rural areas, on inter-urban corridors, a 30-minute frequency is a more appropriate minimum benchmark for the bus service to be seen as a potential mode substitute.

A five year revenue support period for new or enhanced services is one frequently used, and a prudent policy benchmark. However, should entirely new services be justified to large SUEs, where the build-out may extend significantly beyond 5 years from the point at which the service is first provided, this period may not be sufficient to maintain the service until all the potential demand is available to allow the service to become commercially self-supporting. Given the fact that the most cost-effective improvements are likely to involve extension, diversion and/or other augmentation of existing commercial bus routes, Stagecoach endorses strongly the principle set out in the IDP that developers approach commercial operators to provide levels of service set out or conditioned in consents, within agreed funding envelopes that are tested for CIL compliance at the time consent is granted. Stagecoach has undertaken many such arrangements across the country and within its Midlands business in particular. Developers are generally in a position to contract with a variety of local operators to leverage best value. Thus no bus company would be in a position to “ransom” a consent, with unjustified or excessive cost requirements.

#### *4.1.3. T6 Sustainable Travel Choices*

Stagecoach endorses strongly the need to present residents and employees within the Plan area with consistent, relevant and timely information on all the credible sustainable travel choices available. This will be critical to damp both background traffic growth as well as restrain car use in new developments.

However, national experience over several years shows that comprehensive “travel packs” are ineffective, even where they are consistently supplied to new residents and businesses, which in practice is actually the exception rather than the rule. Such packs are rarely comprehensive, and even when they are, they cannot deliver targeted information relevant to a specific individual’s sustainable travel options. Not least, many aspects of these packs can become out of date quite easily. They are also very expensive to produce, and the outcomes are very costly and difficult to monitor.

We strongly recommend that reference to Travel Packs is deleted in the IDP. Rather, developers should be expected to specify explicit strategies to deliver personalised travel planning, allowing them flexibility to use new web-based platforms and applications. Most notably, Liftshare's "MyPTP" package is now being explicitly developed to support mode shift from residential development across Essex, in partnership with Essex County Council.

We would welcome discussing further with WCC and developers how the MyPTP application, alongside specific physical and service improvements, can actually consistently achieve impressive levels of travel behavioural change to a full range of more sustainable modes from both existing residents and employees, as well as from new development.

## **4.2. Europa Way "Sustainable Spine"**

### *4.2.1. Current Conditions*

The spine is not currently used by any regular bus services, despite the fact it is the main link from Warwick and Leamington to and from the M40. The road offers no bus stopping or waiting facilities and is designed primarily as a local major distributor, with no footways or frontage access, nor pedestrian connectivity into adjacent land.

However, this is one of three main routes linking the South of Warwick and Leamington SUE to Leamington Town Centre, and represents the most direct potential bus route to Leamington from the Southern Park and Ride site or sites, both to be located west of Europa Way south of Gallows Hill. Thus the delivery of infrastructure to support bus services, including bus priority, will be essential to meeting the objectives of the Plan and the WaLSTS Local Transport Objectives.

Not least among these objectives is likely to be the facilitation of a high quality public transport offer to new residents of the Southern SUE. Notwithstanding the parallel route for buses to be offered by the Community Spine Road through Myton Garden Suburb to the west, the design and alignment of this route may well be less advantageous in practice, especially to Park and Ride Buses and any express service towards Gaydon/Lighthorne Heath, and potentially beyond. As well as providing a more direct and possibly a faster service, Europa Way also potentially offers much better access to existing major employment areas to the east.

### *4.2.2. T7: South of Warwick Park and Ride*

Stagecoach notes that the proposals map includes an area of search west of Europa Way for this facility, but the IDP now refers to the requirement being superseded by the Park and Ride with 500 spaces agreed with The Asps consent, to be provided for near Greys Mallory.

At the Asps Appeal, a number of matters were discussed. In particular the delivery of this Park and Ride facility was at no point supported by WCC. Indeed, under cross examination, WCC's then Head of Highways Development Management asserted, as a matter of public record, that WCC would not accept any facility provided by the developer.

Separately, the developer also insisted that a dedicated bespoke bus service was the only one that could provide a sufficient quality of service to work. This was contrary to WCC's previous policy position, set out in the previous evidence before the Examination, that a "virtual" park and ride,

providing synergy with local bus services should be provided: a position that Stagecoach has consistently strongly supported, and continues to.

Stagecoach already operates, on a fully commercial basis, several such Park and Ride sites, including Waterwells in Gloucester and South of Coventry, close to the Plan area. Stagecoach is not aware of any Park and Ride nationally, with just 500 spaces, that sustains a bespoke 15-minutes or better frequency without very considerable sums of ongoing revenue support.

Notwithstanding the developer's apparently open-ended financial commitment at The Asps (the legality of which under CIL Regulation 122 is open to some question), Stagecoach would strongly urge the principle of virtual Park and Ride to be maintained, as at least an option in Policy, not least to maximise the opportunity for the service to become commercially sustainable into the long term, and to help ensure that sufficiently attractive frequencies are provided to motorists to make the P+R facility effective.

Secondly, for the measures on Europa Way to be most effective in the round, greater Park and Ride capacity may well be needed. A second facility at the "Area of Search" need not be incompatible with that at The Asps: indeed served as they would be on a single key corridor, but also taking advantage in the second case of additional bus services feeding in to/from the eastern portions of the southern SUE, such a facility could well prove to be both sustainable and synergistic with the wider mode shift strategy for the Southern SUE and wider Growth Focus.

Irrespective of any of the above, the Plan strategy and the Draft IDP need to be consistent.

#### *4.2.3. T15/T17/T18 Europa Way Dualling Proposals and potential Bus Advantage Measures*

There is an apparent divergence between what is indicated in the WDC Design Guide for the Southern SUE and the Draft IDP, and the emerging proposals in the WaLSTS.

The Draft IDP assumes a corridor-wide general capacity improvement on Europa Way. In essence these comprise:

- T15 Heathcote Roundabout improvements and signalisation
- T17 Europa Way Dualling Stage 1 Greys Mallory-Heathcote
- T18 Europa Way Dualling Stage 2 Heathcote-Myton Road (including junction improvement at Shires Retail Park)

Given existing congestion and proposed large-scale development, Stagecoach supports these measures strongly.

WaLSTS apparently also proposes a number of bus priority measures on Europa Way from south to north, as far as the approach to the Old Warwick Road/Myton Road/Princes Drive roundabout. This is, of course, very welcome.

The key therefore, is the degree to which the offline measures for buses proposed in the IDP along the Community Spine Road (and linking to the west along the Gallows Hill/Banbury Road corridor towards Warwick) are effective. If so, then the need for further specific measures on Europa Way will be greatly diminished. This will be even more the case if Tachbrook Park Road becomes a more frequent bus corridor, directly serving existing employment to the East of Europa Way.

Secondly, if it is the case that the P+R service to Leamington will be provided as an express bespoke service, then it makes rather more sense to route it via Europa Way than along the Community Spine, if only to reinforce the perception of speed and directness. Any express service to the new settlement at Gaydon/Lighthorne Heath would also be highly likely to use Europa Way.

At the very least, provision for suitable bus stopping facilities should be made on Europa Way in the vicinity of the CSR junction south of Gallows Hill (unless a second P+R facility is provided in this precise area that can be served by passing services easily), and further north in the vicinity of the eastern access to the WCC land at Myton Garden Suburb.

#### *4.2.4. T8: Southern SUE Community Spine Road and Southern Park and Ride to Leamington associated bus advantage measures*

West of Europa Way, between a new signalised junction south of the Heathcote Roundabout, and a new junction at or near the Tachbrook Park Road, Stagecoach has to date consistently indicated that this route could offer the basis for an efficient bus route corridor, that provided for “virtual bus priority”, whether for a dedicated Park and Ride service or a common service that also served intermediate demands to Leamington, and thus likely to sustain a radically higher level of frequency on a commercial basis than if separate services were to run duplicating each other between the P+R site/s and the Town Centre.

The proposals involve, Northbound to Leamington:

- Signal bus detector loop on exit from The Asps P+R
- Northbound bus lane along the Gallagher portion of the CSR, between Europa Way and Gallows Hill junction
- Bus gate to release buses across Gallows Hill northbound or left onto Gallows Hill towards Warwick
- Bus lane on the CSR approaching Europa Way in Myton Garden Suburb, and left turn priority and bus lane northbound. This feeds into a bus lane around the western flank of the modified Shires Retail park roundabout.
- Bus detector loops on all arms of the Morrisons access, and at the Bath Street/Spencer st gyratory

Southbound, the proposals involve the benefits of the signal detector loops described above and:

- A bus lane through the modified Shires Retail Park Roundabout
- Priority right turn at signals from Europa Way into the northern end of the CSR at Myton Garden Suburb

It is apparent from this that:

- 1) There is much less bus priority provided southbound, which we suspect is likely to affect reliable operation of all bus services, including any P+R provision, at peak times and particularly the evening peak. At the very least, some southbound priority is likely to be required on the CSR on the approach to the Gallows Hill junction, and likewise further south within land South of Gallows Hill on the approach to the right hand turn to Europa Way,

which movement we note is intended to relieve pressure on the Heathcote Roundabout for general traffic.

- 2) The Shires Retail Park and nearby development (including a major sheltered residential complex) will in effect be severed from the bus network, unless a rather time-consuming diversion is maintained into the site. This challenge warrants further examination.

However, while Stagecoach welcomes the broad approach to the alignment of the Community Spine Road, it has serious reservation as to whether this important potential will be fully realised. In particular:

- As indicated previously, the Design Guide for the SUE indicates that the street will be 6.1m wide, but also will accommodate direct frontage access. If, as the Design Guide appears to indicate, such access is limited, and that a sufficient number of parallel parking bays are provided such that there is a clear carriageway width of 6.1m, with minimal on-carriageway parking, then this might well prove to offer a suitable high quality public transport corridor. However, the consented initial stretches for the Community Spine Road (CSR) east of Europa Way in Lower Heathcote do not provide for this.
- The street will provide direct access to the Strategic Education site allocation. This will represent one of the largest concentrations of 11-18 student education provision in the Region. At peak times, this will generate very significant numbers of traffic movements, and, in all probability, many journeys seeking to drop or collect students at the site. Local and national experience makes very clear that parents will not always behave rationally, appropriately or indeed in manner in keeping with the law, in these situations.
- There has to date been anticipated to be a stagger where the CSR crosses Gallows Hill, between land to the South and the WCC holding to the North. This introduced two signalised junctions, that any bus route running along the CSR has to negotiate in either direction. Rationalising these proposals to provide a single signalised crossroads seems much more likely to facilitate efficient movements for all traffic, including buses, in an area where demands on the already heavily congested highway network are clearly going to rise very significantly more still.
- The CSR is also apparently intended to act as a means to unload the Heathcote Roundabout for movements running eastbound on Gallows Hill, allowing such trips to assign via the CSR to the north and south to reach Europa Way, and vice versa. This is explicitly mentioned at paragraph 4.6-7 (p.18) of WSTA (F), where it is stated that without this diversionary route being offered, traffic will sit in extended queues on the western approaches to the Heathcote roundabout. In addition, WSTA (F) describes the assumptions that traffic originating within development South of Gallow Hill, will all be directed to use the CSR to reach destinations to the north, not Europa Way. If this is the case, the CSR itself and its key junctions are bound to become very well-trafficked, introducing an inherent conflict with the provision of a direct and efficient bus route, that is as free from traffic congestion as possible.

**Stagecoach would finally observe that access arrangements for most of the SUE sites have not been reserved for future determination, and that as such, the proposed arrangements set out in the WSTA (F) may well not prove to be capable of implementation, since applicants will be perfectly entitled to take forward those arrangements already consented. Stagecoach is quite**

**concerned that if this is the case, that future traffic conditions are not prejudiced by the consents issued** without a full and consistent mitigation strategy having been worked up. This concern has lain at the heart of our previous Objections to the Plan.

#### *4.2.5. T13 Princes Drive/Myton Road/Old Warwick Road junction*

We address this junction under this corridor as it represents an integral and vital part of any successful Park and Ride offering between the Southern P+R site/s and Leamington. The junction and its approaches are also under severe current pressure at peak times.

Rather more troubling, the WSTA (F) modelling shows that this junction has a significant, and unsurprising wide-ranging impact on the operation of the network south of both Warwick and Leamington (paras 6.34 6.36 WSTA (F), and elsewhere). The peak capacity and operation of Myton Road is especially problematic. Stagecoach notes that the currently-modelled mitigation approaches are far from crystallised into an optimised scheme: indeed, the current signalisation that has been assumed may well not be as effective as a widened signalised roundabout. We also note that the interaction with the Princes Drive and Park Drive junction is likely to be significant, and that should WDC land be available, then more mitigation options start to become feasible.

It appears, from this heading and the summary of measures proposed in the Draft IDP under T8 for bus priority in support of the Southern P+R, that no bus priority is envisaged at this junction. As well as the P+R service, and any others needed to supplement or otherwise serve the Southern SUE and existing neighbouring employment, retail and residential uses; the junction is used by the X18 trunk strategic inter-urban bus service, and the X17 which is also a major, frequent bus route.

**The position of this one junction in the local bus network is so strategic, that the approach taken to addressing the congestion impacts here will likely have a disproportionate impact, positively or negatively, on the way that the entire bus network performs at the Reference Year, and indeed for a long period leading up to it.**

We therefore urge, as strongly as we can, that further refinement of the mitigation scheme for this junction, and all its approaches, addresses bus priority at its heart. The alternative is to risk the effectiveness of most of the other bus priority measures being entirely or largely undermined by this becoming a “bottleneck”, which would in effect impact on the reliable and efficient operation of most of the bus services in the urban area, directly or indirectly.

#### *4.2.6.T11: Bus Service Infrastructure South of Leamington/Warwick*

Stagecoach urges that the timely delivery of bus routes and bus stop facilities is planned for and prioritised between WCC and the relevant developers. It is essential that this matter is positively planned for from the earliest stage in the development “life-cycle”, to avoid developments being occupied before convenient access to bus services can be provided.

Bus stops locations must be indicatively identified as master plans are prepared at Outline Stage and fixed when Reserved Matters are sought. If necessary, conditions should be imposed on Outline permissions.



Stagecoach notes with increasing concern, that at Hawkes Meadow (the first part of the SUE to come forward) the agreed bus stops to be provided on Harbury Lane have still not been delivered despite the fact that substantially all dwellings are at or nearing completion and most are occupied. This kind of situation only serves to aggravate car-dependency.

#### *4.2.7. T12: Bus Services South of Leamington/Warwick*

The Public Transport improvement strategy for the Southern SUE was formulated by WCC to a great extent reactively, as major elements of the then proposed SUE were brought forward. Stagecoach recognises that in the circumstances, this was unavoidable. The strategy involved assumptions about the scale of the final SUE and the likely commercial service sustainable. It also rightly involved the need to consider the CIL Regulation 122 tests.

The strategy involved the assumption (in the absence of any better understanding or clear alternative) that existing service 68 running through Warwick Gates would be increased to every 20 minutes. However this is a very long route, involving 5 buses in the cycle, on an exceptionally tightly-timed service. Such an upgrade would involve 2 extra buses in the cycle. The current route is also extremely circuitous, uses roads within Warwick Gates that were never designed to accommodate buses, and fails to serve, in any meaningful way, the eastern portions of the SUE that are now commitments. Stagecoach submits that service 68 is unlikely in practice, to represent the best basis for a bus service upgrade for the SUE as now proposed in the Draft Local Plan, at least in its current form.

It also assumed that pump-priming funds would be applied to a “virtual park and Ride” service serving both the Southern P+R and picking up intervening demands that materialised within the SUE west of Europa Way (Myton Garden Suburb etc.). However, the P+R is now intended to be provided by a “bespoke” service, that will be entirely funded by development at The Asps.

The notional net costs of these services were the split and prorated across the sites brought forward as parts of the SUE, based on the total dwelling quantum then envisaged. However this quantum has very greatly increased.

Positively, contributions have continued to be sought and agreed by WCC, from the additional dwellings, at the same rate. The Draft IDP is not entirely clear about this figure. Excluding The Asps, the remaining quantum including all the Southern SUE sites now proposed as additional allocations, amounts to about 4,175 dwellings, which multiplied by an Index-linked £638/dwelling, implies a pump-priming fund of £2.664m. Given the scale of the development and the very limited level of existing services, such a sum is certainly justified to ensure a sufficient level of bus service is made available at an early stage to give the best possible chance of new residents becoming habitual and regular users of a bus service or services, provided to a standard that makes them a credible alternative to car use.

It is worth making clear that at Warwick Gates, developed between 1994 and 2004, 2011 Census figures show that 59% of households own two or more cars, and that bus mode share for journey to work is correspondingly extremely low: just over 1%<sup>2</sup>. This is an egregiously good example of very

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<sup>2</sup> 2011 Census, Data for LSOA Warwick 012D, covering the western part of Warwick Gates

high car dependency. Such a situation cannot recur on the Southern SUE, without very serious consequences.

The Southern SUE involves a very large quantum of development that is most unlikely all to be delivered within 5 years, and may well extend beyond 10 years. While development has begun in earnest, based on WDCs trajectory, it appears that an 8 or even 10 year bus service support period could well be justified. Given that the full costs of running a single bus exceed £150,000 per annum Monday-Saturday, £1.7m mentioned in the Draft IDP seems a relatively modest pump-priming sum when set against the scale and timescale of development.

The scale of development already consented, and that arising from the Appeal at Land South of Gallows Hill, makes it evident that a significantly larger pump priming fund will be achievable. However the mitigation impacts needed are also greatly higher, and the extent of the SUE is such that, in reality, more than one radial route will need to be involved. Tachbrook Road and/or Tachbrook Park Road will certainly need to sustain a much more frequent bus service to provide the eastern parts of the SUE with a credible and relevant bus service to new residents, as well as to achieve as much mode shift from existing businesses and residents as can be achieved.

Stagecoach submits that it is important that additional proportionate contributions from land proposed as part of the Proposed Modifications are provided. Also at the same time, more detailed discussions are held to arrive at a comprehensive bus service augmentation strategy for the Southern SUE that:

- Ensures that a good level of service is available to all new residents at occupation, as far as possible within 400m, in line with the Draft IDP aspirations
- That a 15 minute frequency is provided on the key bus corridors at the earliest prudent stage
- That the bus routing provision on the CSR is delivered, opened and made continuously available to buses appropriately early and in step with occupations. Stagecoach is especially concerned that the link between the WCC and “Consortium” land at Myton is conditioned for a suitable trigger date, to avoid Myton Garden Suburb being essentially unserved by bus until the development is near completion. In the same way, the CSR link through the SUE between Lower Heathcote, the STW land, and Grove Farm will need to be provided relatively early, if very large numbers of dwellings built and occupied south of Harbury Lane, which otherwise will be entirely unserved by bus, can in fact be availed of a good service that is conveniently accessible.
- Ensures that the funding streams involved (including the approach taken for providing and supporting the operation of the Park and Ride service) are applied prudently and to the best effect overall, such that the highest possible level of patronage is developed as fast as possible and the overall level of commercial bus provision is maximised in the long term. The tradeoffs requiring consideration to achieve this are not simple, and effective ongoing partnership working between developers, WCC and operators will be of the essence.

#### **4.3. A452 Corridor Leamington-Kenilworth**

#### *4.3.1. Current conditions*

This corridor represents one of the most intensively-served by bus of any in the West Midlands, certainly outside the Birmingham conurbation. It is used both by Stagecoach and other operators' services, linking Leamington with Kenilworth, Warwick University and Coventry (including JLR Whitley). The Unibus service is the most frequent, running up to every 5 minutes at peak times during university terms. The X18 also serves this corridor, being the fastest bus route to Coventry City Centre, and running effectively non-stop between Thickthorn and the City Centre via the A46/A444.

The route is also one of the major approaches to Leamington from the SRN, and as such is heavily trafficked. This, and the existing very frequent bus service makes the Corridor an ideal location for a virtual Park and Ride operation, which to Leamington would take advantage of a contra-tidal flow on the Unibus operation. Stagecoach has made representations that such a facility should be planned for, and we applaud the inclusion of this scheme as part of the Proposed Modifications.

#### *4.3.2. Modelled future conditions*

Stagecoach supports the earliest possible attention to this corridor, both in terms of the capacity of junctions and links, all of which are under considerable pressure at peak times. This corridor already sustains a very high frequency of bus services: indeed it is the most intensively operated bus corridor in the entire County by some margin, with buses scheduled at less than 5 minute interval at peak times during university Terms.

The proposed Park and Ride north of Milverton on this corridor begs the issue of comprehensive bus advantage, not least because a very high frequency bus service is already in place today. However, the current service is very hard to operate reliably with constant intervals between buses. The attractiveness of the facility in achieving mode shift for both journeys into Leamington, and just as important, towards the University of Coventry and potentially Coventry, Whitley, Stoneleigh and Westwood, depends on buses benefiting from comprehensive priority measures both north and south of the facility.

Were this to be provided, there is evidence from a significant number of places that very high levels of mode shift could be achieved, across both WSTA Modelling areas.

Stagecoach notes that the Revised Development Strategy plus New Sites scenario in support of the current Plan proposals, sees very considerable increases in modelled journey time on the corridor, mainly southbound, towards Leamington in both the morning and afternoon peaks as detailed at para 6.38 in the WSTA (F). These are, again among the most significant increases in delay forecast by WSTA anywhere in the Plan area.

The strategic importance of this corridor for the wider bus network is such that bus priority must be directed to both supporting the very important current role buses play in the corridor, and ensuring that the opportunity for them to play a still more effective one is realised

#### *4.3.3. Commentary on overarching mitigation strategy*

Stagecoach notes and recognises the logic set out in the WSTA (F) report that major improvements to the capacity of this corridor are expected to have a wider benefit to the whole network south of the A46, based on the WSTA modelling that shows a reassignment of traffic from other routes, including some links and nodes south of the Avon.

Stagecoach therefore strongly supports the principle of dualling, and junction improvements, which will include a series of bus advantage and bus priority measures between the P+R and Thickthorn Interchange. Such measures will be essential if the proposed Park and Ride is to maximise its potential contribution in damping the rise in movements on both the corridor itself, and at least as important, on both the SRN north of Thickthorn, and in Leamington Town centre.

Several major issues arise from the WSTA (F) work.

- Despite the overall dualling, modelling suggests that delays will possibly increase over the current conditions if junction signalisation is introduced (WSTA (F) para 6.36). This risks causing a major and difficult conflict with wider network management imperatives (see below). However, significant mode shift to bus could well, in our analysis, reduce PCUs to the point where some of these difficult tradeoffs could be resolved, to a greater or lesser extent, subject to effective bus priority being delivered
- the approach taken south of the proposed Park and Ride towards Leamington Town Centre. Here, widening or dualling to provide general capacity of all traffic simply is not feasible or appropriate. Continuous and seamless bus priority will be required southbound down Kenilworth Road. This needs to take the form of a Bus Lane. It is also likely to be required on approach to the Lillington Ave junction north bound.
- The measures taken at junctions further north, with Sandy Lane and Bericote Road from where links run south east towards Cubbington and Lillington, will also be highly relevant to ensuring that the demand for traffic movements on the A452 south of the Park and Ride is relieved as far as possible. However as noted above, signalling these key junctions could lead to a deterioration in traffic conditions despite the dualling. Stagecoach notes that bus detector loops are proposed on the A452 arms which ought to maintain the progress of traffic, but when buses are running so frequently it is not entirely clear to us that there may not be perverse outcomes if there is no bus segregation on the key approaches. It may be that a choice has to be made to prioritise movements on the A452, where public transport services can be developed further, than on the subordinate links. The junction measures on the A445 corridor at the southern end of these links (see section 4.4. below) will equally be relevant to ensuring that traffic assigns as rationally as possible at peak times.

The A452 and wider WaLSTS strategy could also potentially much better address the demand for local traffic movements crossing the town centre, if bus priority between the P+R and Leamington town centre, including via the “Europa Way Sustainable Spine” (T17-19) could seamlessly align such that frequent bus routes from the southern SUE and potentially the southern P+R could operate across the town centre.

This North-South public transport spine would also serve to open up a much greater range of origin and destination pairs that could be served by a single bus service corridor, or route group, focused on the Northern and Southern park and Rides. The appeal of the services provided would increase

greatly as a result. Key trip attractors at peak times, including many outside the Plan area, could be linked with frequent and direct bus services, taking advantage of comprehensive, effective and seamless bus priority. These could include JLR Whitley/Gaydon, Warwick Technology Park and Warwick College, as well as several major Secondary School sites, depending on the ultimate routing of services.

Stagecoach regrets that the corridor approach to presenting the possible mitigations seems to have prevented more holistic evaluation of other credible potential means, at network level, to dampen demand for personal car movements in the core urban areas covered by the Plan.

#### *4.3.4. T22 Park and Ride North of Leamington*

We make comprehensive further comments in our representations regarding the proposed additional allocation North of Milverton (H44), and above.

Stagecoach has consistently supported the provision of this Park and Ride, and has made previous representations that its omission from the previous submission version of the Local Plan seriously undermined its soundness.

The language in the Draft IDP regarding the way the facility works alongside wider corridor-based improvements, incorporating bus priority, needs strengthening. If the provision is to be fully effective, bus priority both north and south of the Park and Ride has to be secured.

Stagecoach welcomes and endorses in the strongest terms, the logic expressed in the Draft IDP that the site should be located as close as possible to the A452, to allow most or all passing services to use the facility, providing the fullest possible range of destinations and frequency of service. Stagecoach agrees that, even at current frequencies offered by services passing the site, the schedule offer would be attractive to car users.

The optimum location of the facility is something that Stagecoach would want to see examined further. There seems to be a divergence of view between what is stated in the draft local Plan proposed modification, and the Revised Draft IDP.

The Draft IDP states that the optimum location would be between Thickthorn and Blackdown roundabouts. Stagecoach does not see the logic for this articulated in the IDP, and is not entirely clear that this is necessarily the case. Presumably this location would permit the interception of traffic heading north from Cubbington/Lillington to the A46. However this is unlikely to account for so great a proportion of potential demand that this fixes the location, and in any event, a location further south could still be relatively easily reached from these parts of Leamington.

While easy access from north east Leamington is a relevant consideration for the location of the Park and Ride, Stagecoach believes that a Northern Park and Ride site delivered as part of the proposed allocation North of Milverton would be in all essential senses, just as effective as a site further north. Such a site would in our view, allow for a far greater certainty of delivery as comprehensive proposals for the draft allocation and the wider site. The draft allocation H44 actually makes

provision for 4 Ha for this facility and Stagecoach notes that the promoter has reserved an area alongside the A452 in its indicative draft Master Plan that could be used as a site for the facility.

#### *4.3.5.T23 Thickthorn Interchange, Kenilworth*

Stagecoach notes and welcomes that improvements are planned. In particular, we welcome that bus priority is to be incorporated on the approaches to the interchange. However, the nature of this is not specified.

Frequent bus services approach the interchange from all directions but the west. Stagecoach would therefore point out that consideration ought to be given to bus priority on all approaches, but in particular from the south.

Additionally, many bus movements approaching from the south will be seeking to turn right onto the A46. Thus, it may be the case that bus priority should be weighted towards the off-side approach lane, and that a bus gate might be delivered at the end of the approach flare to the circulatory carriageway, that held northbound traffic and allowed buses to use this lane to bypass queues while heading straight on towards Kenilworth, as well as on to the A46.

It should also be noted that bus priority at Thickthorn ought to be designed with a view to how the access arrangements to the Thickthorn residential allocation is arranged. If, as seems likely, an entirely new bus route is to be provided to this allocation and the additional land proposed east of Kenilworth, then a larger number of northbound buses will cross the Interchange and be seeking to turn right into the site shortly thereafter.

#### *4.3.6.T24 A452 Bericote Roundabout*

Stagecoach notes that bus priority on approach to this junction is to be considered. Given the modelled increases in journey time and queue lengths described in the WSTA (F) Report, Stagecoach considers that an ambitious mode shift strategy is both justified and essential in this corridor.

Bus priority is therefore essential in the corridor to ensure both that peak bus journey times are reduced compared with current conditions, and that consistency of journey times are significantly improved, through a comprehensive approach to improving the corridor.

#### *4.3.7.T25 A452/B4113 Blackdown Roundabout*

Stagecoach notes that bus priority on approach to this junction is to be considered, but no scheme is specified. A comprehensive bus priority scheme needs to ensure that northbound and southbound on the A452 buses are able to avoid the worst congestion that may arise, if they are to play the fullest role in making the best use of available roadspace.

Bus priority is therefore essential in the corridor to ensure both that peak bus journey times are reduced compared with current conditions, and that consistency of journey times are significantly improved, through a comprehensive approach to improving the corridor.

Stagecoach notes that the modelling shows that both in the morning and evening peaks, it is southbound that the biggest problems are anticipated to arise. Dualling the road south of Bericote to Blackdown, and indeed beyond as far as the proposed P+R, is something that Stagecoach

recognises may well have a very beneficial effect, so long as a new constriction does not arise at the edge of the built-up area. Diversion of motorists to the Park and Ride would be a key component of a strategy to manage demand for road-space further south within the town, aligned, in all probability, to a robust town centre parking strategy. However, this will require bus priority to be implemented on the Kenilworth road into the town centre.

#### **4.4. Warwick-Leamington-Lillington**

##### *4.4.1. Current conditions*

This corridor, running broadly west-east through Leamington Town Centre, does not align with a single seamless bus route corridor. However, it is used by bus services operating frequently along its whole length. Typically these operate at least every 15 minutes.

These include, from West to East:

- X17 running every 15 minutes between Warwick and Warwick Hospital, via Emscote Road to Princes Drive, then via Warwick Old Road to Leamington, then continuing to Kenilworth and Warwick
- Gold G1 running at least every 10 minutes from Warwick via Woodloes and the Percy Estate, joining the corridor at Portobello, then via Rugby Road and Lillington Avenue to Leamington Parade
- Service 68 from Leamington Parade to Lillington and Cubbington running generally every 30 minutes, serving much of Cubbington Road
- Service 67 running up to every 15 minutes to Lillington, that uses a small section of Cubbington Road

##### *4.4.2. T26 Emscote Road/Greville Road junction*

Gold G1 and X17 both use this junction and those further east. Both are frequent services that represent the key public transport spine within the urban area, and both journey times and reliability are affected by issues here and further east. Stagecoach welcomes, therefore, the proposals to address these issues.

Stagecoach notes improved provision is to be made for cyclists, as a result of signalisation, but none for buses. Stagecoach provides, on services G1 and X17, over 330 seats per hour, each way, through this junction, and this could easily rise. It is therefore very disappointing that the potential for bus priority does not yet appear to have been considered.

Gold G1 struggles to exit from Greville Road at peak times, at the current priority junction. The junction is also poorly configured to allow buses to make the movement. Space within the highway might be available to create a short bus lane and bus gate southbound existing from Greville Road.

Stagecoach considers that a rather more comprehensive approach is needed incorporating changes to the Tesco access junction, and that with Rugby Road. If capacity is to be best improved, a conjoined approach to signal management needs to be taken forward, including SCOOT and MOVA,

with the scope to prioritise through movements at peak times, and to incorporate bus detection loops.

#### *4.4.3. T27 Princes Drive/Warwick New Road junction*

Stagecoach recognises that this junction must be addressed to provide for current issues as well as the growth anticipated by the Plan. Stagecoach notes improved provision is to be made for cyclists, as a result of signalisation, but none for buses. Stagecoach provides, on service X17, over 152 seats per hour, each way, through this junction, and this could easily rise. It is disappointing that the potential for bus priority does not yet appear to have been considered.

As well as considering the design and operation of the junction in conjunction with measures to the west, there is also a need for any approach to address measures that need to be taken on Princes Drive to the south, at Park Avenue.

This is touched on as a heading after T32 in the Draft IDP. Stagecoach strongly urges that significant improvements are made to this junction, which we agree, will certainly require land to be acquired from WDC currently forming part of the Household Waste Reception Centre west of Princes Drive, and possibly elsewhere.

One important function of the junction could quite possibly be to unload Old Warwick Road, and quite possibly the Myton Road junction further south, especially if the Park drive route towards the town centre needs to be increased in capacity to preserve the operation of the wider network south of the town centre, near the Station and High Street.

#### *4.4.4. T29 A445 Leicester Lane, junctions with Sandy Lane and West Hill Road*

The A445 Leicester Lane is not currently used by Stagecoach services and is not a major bus corridor.

However the Company is well aware of the congestion at peak times on the junctions caused by the intersection of major flows between the SW-NE (towards Ryton, Stoneleigh and Baginton; and SE-NW as traffic from south and east of Leamington seeks to join the A452 and then the A46. Much of the traffic in this area is also, in effect, “rat-running.”

The development strategy, and in particular addition of major employment south of Coventry at Stoneleigh and at Coventry and Warwickshire Gateway, will both add to these pressures, and at the same time, makes it that much more likely that direct bus services in the corridor will be required, and commercially sustainable.

Stagecoach supports measures to be taken at these junctions.

However there is a need to consider how the overall network approach can be optimised to achieve both overall mode shift (including directing car traffic currently using Sandy Lane in particular to the northern Park and Ride), and also provide for a high quality bus service to be offered along this route in due course.

### **4.5. Leamington South (including Tachbrook Road)**

#### *4.5.1. Current Conditions*



The Southern SUE, and wider committed development within the District and beyond, makes this likely to become a greatly more important bus corridor in the foreseeable future. Today services are very limited, comprising in essence the hourly X15 (which from Summer 2016 will be withdrawn from this area and replaced by a facility to Bishops Tachbrook only), and the hourly combined 65-66 to Harbury and Southam.

Tachbrook Park Road, mainly served today every 30 minutes by service 68 en-route to Warwick Gates, is equally likely to be the focus of improved services for this reason.

#### *4.5.2. General commentary on mitigations South of Leamington*

Stagecoach anticipates moving its main operational depot for the region and Plan area, to Trident Park, within the short term, as part of WDC's aspirations to secure comprehensive redevelopment of the land north of Leamington Rail Station, a good proportion of which is occupied by the current facility. Operational requirements throughout the day will demand that vehicles and staff can make easy and direct progress to and from the focus of the network at Leamington town centre, for example for driver breaks and changeovers. This adds to Stagecoach's already high interest in measures proposed to address congestion in this area.

Local congestion at peak times reflects the very high concentration of employment between Tachbrook road and Europa Way. The Southern SUE will evidently add significantly to network demands, not least because the most direct route to Leamington town centre, station and routes to the north, from much of the SUE, align along Tachbrook Road in particular, not Europa Way.

In addition, the proposed addition of 499 homes east of Whitnash, to which Stagecoach objects, will place additional demands on the network for east to west movements crossing Tachbrook Road at St Helens Road/Queensway. This conflict already gives rise to significant congestion, and its impact on the bus network is relatively limited only because so few services use the corridor.

Tachbrook Road's attractiveness as a bus route is today very limited by the fact it directly serves a very limited hinterland en-route. Both established employment and residential development to the west "turns its back" on the road. To the east, development is either limited or is already served frequently by Gold G1 within Whitnash. As Tachbrook Road reaches High Street, there is currently no scope for bus stops to serve the rail station conveniently, a matter that has previously been looked into by Stagecoach with WCC at some level of detail.

However, it may be that a greater focus needs to be placed on the corridor, not only to cater for movements from the Whitnash end of the Southern SUE, but also:

- To act as a potential reliever corridor for some longer-distance movements from development in Stratford District, including the GLH new settlement, as well as to better cater for increasing demands from a substantial quantum of more dispersed committed development in villages south and east of Leamington.
- Because planned changes at Shires Retail Park roundabout on Europa Way offer some grounds to suggest that Queensway and Kingsway might be incorporated into a bus priority corridor, that allows most buses to avoid Old Warwick Road and the problematic junction at Myton Road/Princes Drive entirely. This would probably require the provision of some kind

of bus-only gate, to prevent rat-running. It would also need the matter of effective bus interchange at Leamington Station to be satisfactorily addressed.

Stagecoach is therefore keen to explore at the earliest opportunity, how some of the more difficult issues thrown up by WSTA south of Leamington might best be addressed, by looking at creative options for bus priority and mode shift on alternative alignments.

#### *4.5.3. T30 Bath Street/Spencer Street/High Street/Lower Avenue gyratory*

Of all those measures that future town centre strategies will need to address, and that need working up in more detail, this is one of the most significant. Stagecoach endorses the importance of ensuring that traffic conditions in this area are neither deteriorate further, and ideally allow for more reliable and faster bus journeys.

The existing bus network converges around this area: in fact, every Stagecoach service in the Plan area routes around these streets at some stage. As a key node between north-south and east-west flows, it is unsurprising that serious congestion develops.

The north-south flow across this area is not one that is unavoidably required by general traffic. This can use other links to the east or west, to approach the town centre from the east or west. Indeed, the unrestricted use of the full length of Leamington Parade by general traffic as a north-south corridor is neither desirable, nor sustainable. As the key southern “gateway” to the town centre, there should be serious consideration given to what traffic and what movements should be accommodated, not least because there simply are too many constraints to provide any additional meaningful road space.

Given the presence of the Station and the fact that this is the southern end of the Primary Commercial Area, if buses are to maintain and develop their role meeting the movement needs of the District, it is realistic, and entirely consistent with the plan strategy, to suggest that bus frequencies and network connectivity should increase in this area.

If so, then it is general traffic that needs to take a subordinate role in any solution that emerges.

Given the clear absence of obvious alternative east-west routes for general traffic, this begs some serious questions. It tends to lead to the unavoidable conclusion that significant wider mode shift towards sustainable modes, including buses, is required for the Plan strategy to be accommodated without greatly worsening traffic conditions. It also suggests that in reality, and contrary to what is implied in the Draft IDP, the east-west flow for general traffic needs to be maintained as far as is possible and consistent with other traffic management issues across the network.

Stagecoach therefore remains particularly keen to understand what measures are proposed, and urges that as far as possible we are consulted on potential options that allow the difficult conflicting pressures to be resolved as far as possible.

Any solution will need to:

- Avoid any deterioration in peak traffic flow, especially for buses

- Provide for bus stands allowing buses to wait “recovery time”. This is essential at key timing points such as Lower Parade, and allows for punctuality to be maintained, having regard to small-scale unpredictable delays that unavoidably can occur on any journey.
- Maintain convenient access for bus passengers wishing to reach the Station, and vice versa.
- Avoid introducing significant additional circuitry or mileage to bus routes. This increases delay and journey time for passengers, as well as additional substantial operating costs.

#### **4.6. Warwick Town Centre-Heathcote via Gallows Hill**

##### *4.6.1. Current conditions*

The main existing service in this area is route 68 running between Warwick and Warwick Gates via Warwick Technology Park every 30 minutes, continuing on to Leamington and Cubbington. This route is likely to represent, in some form, the basis of a considerably enhanced service to and through the Southern SUE.

It will also provide, in all probability, the route between the committed and potential second Park and Ride site south of Gallows Hill, to the Technology Park and Warwick Town Centre. The proposals associated with the Asps commitment envisage a core frequency of every 15 minutes for this service alone.

##### *4.6.2. Strategic issues and commentary on the corridor strategy*

Stagecoach is aware that the entire corridor presents “wicked” issues: a series of interlinked problems that defy any simple set of answers. The corridor is closely bound up with the ongoing difficulties in Warwick Town Centre, which are long-standing and have been the focus of several studies over a 15 year period.

To date there has been no substantive action.

This makes the formulation of a Warwick Town Centre Strategy, that sits within a compelling and overarching Transport Strategy, that much the more urgent.

Work underpinning WaLSTS presented data that showed that a significant amount of traffic in the town centre is actually crossing the town, without any business in the town centre. The addition of further employment and very significant amounts of housing South of Warwick in the SUE threatens to make this problem a good deal more serious.

Stagecoach also notes the fundamental dependency of this corridor and its operation, on the Myton Road and links to the east towards Leamington (see 4.7 below).

The corridor and its operation is absolutely critical to the Plan strategy, and the success of public transport measures aimed at addressing both the very high current level of car use, and ensuring that sustainable modes play the greatest possible role in mitigating the transport impacts of the Plan strategy. It must be reiterated too, that since we made our original representations, the total quantum of development WDC intends to assign to the Southern SUE has increased to over 5,000 dwellings.

## **4.7. Warwick Town Centre-Leamington via Myton Road**

### *4.7.1. Current Conditions*

The existing hourly X18 service using this corridor, from June 2016, will be doubled in frequency to every 30 minutes along Myton Road. This service represents the “express” offering connecting many of the main urban areas and key employment and educational sites within the Plan area, and linking them to Stratford and Coventry.

East of Princes Drive the corridor is much more intensively used by buses with routes X17 and 68 also running along Old Warwick Road.

The Old Warwick Road is where stops exist that offer direct connections between bus and rail at Leamington Station. This is the only practical place for such connections to take place, given the insurmountable constraints on other nearby streets within easy reach of the station entrance. If mode shift towards public transport is to be achieved to any great extent, this mode interchange will need to provide considerable extra functionality, to accommodate more bus routes, higher frequencies, and much higher volumes of waiting passengers.

Stagecoach notes with particular concern that conditions on the Myton Road link and the junctions at either end are likely to seriously deteriorate as the result of the Plan Strategy (para 6.23 WSTA (F)). There is an apparent tradeoff between the need to facilitate north-south movements to and from the town centres, and the east west movement along Myton Road. The morning peak is seen as being a bigger problem and this strongly suggests the concentration of education provision in this area is to a great extent to blame.

The Plan now envisages further consolidating 11-18 education provision in this area. This causes us some considerable concern, in the light of the WSTA modelling, and the existing and predicted future difficulties at Myton Road, and at the junctions at either end.

WSTA (F) suggests that a number of means to address this tradeoff might involve accepting a significant and deliberate increase in delay and queuing on this corridor, not least to reduce traffic congestion in Warwick and Leamington Town Centres.

In the brief discussion, no attempt is made to consider how mode shift might better achieve that objective, while preserving accessibility and mobility overall to a much greater degree.

Indeed, rather than attempting to hold all traffic on Myton Road at peak, is there a case to use Myton Road as the basis for an express Warwick-Leamington bus corridor, to the point of restricting north-south through traffic at peak times, and reconfiguring the junctions to address the demand for N-S flow through strategic reassignment of demand to bus services taking advantage of bus priority measures on the approaches to these junctions from the SUE to the south?

### *4.7.2. T33 Technology Park/Gallows Hill roundabout junction*

Stagecoach notes the proposal, that sits between two busy existing nodes, and a third proposed where the CSR within the SUE crosses Gallows Hill, a short distance to the east. From the descriptions in the Draft IDP and WaLSTS, it is not clear if the eastern or western access is referred

to. Evidently at peak times, traffic seeking to access or egress from the Park adds further to the delays on the link, while then going on to burden the junctions downstream.

The principle of combining access to the proposed residential allocation to the south with the Technology Park is accepted and obvious.

However, if the route from the P+R to Warwick is to use Gallows Hill as anticipated, it looks highly likely that a much more ambitious improvement scheme along the whole link seems to be required, with bus lanes approaching all the key junctions. Without seamless bus priority in this area Stagecoach remains very concerned that the effectiveness of any bus services from the Southern SIE to Warwick, and/or a Warwick link from the Park and Ride will be fatally undermined.

#### *4.7.3.T34 Banbury Road, Warwick*

This area is obviously highly congested, but solutions are constrained not least because of the need to have regard to the Registered Historic Park and Garden at Warwick Castle, and the heritage significance of the setting of the Castle and its grounds, to which Banbury Road is a key boundary.

Stagecoach notes and welcomes the short stretch of bus lane proposed on approach to Banbury Road from Gallows Hill. It is not clear how far this length on its own will be sufficient to create meaningful bus advantage.

Rather than adding lanes for general traffic, at reduced widths, which would only serve to feed higher rates of general traffic flow into Warwick Town Centre which is even more constrained Stagecoach would urge that any highway width is dedicated to buses and High-occupancy vehicles. This would incentivise mode shift for movements to and from the schools, including lift-sharing. Traffic to and from the schools is known to be a very considerable contributor further

#### *4.7.4.T35 Banbury Road/Myton Road junction*

Again it is unclear that providing extra capacity here for general traffic will have much positive impact if links and junctions downstream in each direction cannot also be improved to a capacity commensurate, to avoid bottlenecks developing elsewhere. Given the issues both north and east of this junction, which are serious and attract a great deal of comment in WSTA (F), we would urge that measures that protect the flow of buses, and potentially other higher occupancy vehicles, are considered first.

It should be assumed that the number of buses using this junction will markedly increase over the Plan period. Thus the case for bus priority needs to focus on a clear vision for substantial public transport improvements, rather than the current bus network.

#### *4.7.5.T36 Priory Road/Smith Street/St Nicholas Church Street*

The main flow requirement for buses is focused on the north-south movement between Warwick Bridge and North Gate, at the top of Priory Road/The Butts. No major bus route currently uses the Priory Road or Smith Street. However, it is clearly a major traffic corridor.

Much attention has been paid over the years to attempt to resolve the traffic conflicts in this highly constrained area, with no results to date.

Stagecoach would again suggest that without demand management, including stronger disincentivisation of single-occupancy car use more generally and in this area in particular, there is likely to be no way of avoiding conditions becoming markedly worse.

#### *4.7.6.T37 Castle Hill/St Nicholas Church Street/Banbury Road*

This broad corridor running on the east side of the town centre is the only way buses can run from south of the river to the bus station on the west side of the town centre.

Butts Hill is not wide enough to allow a bus and any other vehicle (including cars) to pass within the carriageway width. This strongly suggests that one-way uphill working is required. We would however suggest that a contraflow bus lane down-hill on both The Butts, and a conjoined southbound bus lane on Castle Hill, may be both highly effective and desirable, especially if lights activated by buses stopped the uphill flow of traffic to allow buses running downhill to have priority through the narrowed area on a shuttle-working basis. This might work well in conjunction with a rationalised gyratory system in the area, depending on detailed design.

We also suggest that any additional capacity on the Banbury Road towards Myton Road, should be preferentially allocated towards sustainable modes if it can be provided. We wonder if serious consideration needs to be given to the principle that general traffic towards Leamington, or seeking destinations to the south, ought to be directed to use the SRN in the first instance, or at the very least, the Emscote Road corridor.

Stagecoach would be very keen to work closely with WDC, WCC and its consultants as proposals for this very important area are worked up.

### **4.8. A429 Coventry Road, Warwick**

#### *4.8.1.Current conditions*

Of all the corridors considered, this is the only one that has very limited current and likely future public transport significance.

The short stretch at its southern end is by far the most important being used up to every 15 minutes in each direction between Warwick Hospital, Station and the Emscote Road. This stretch and the junction with Coton End, is nevertheless highly important to the efficient and reliable operation of this service.

An hourly service, currently numbered X16, runs between Warwick and Kenilworth via Leek Wootton along the full length of the corridor; however it is not envisaged that this corridor is very likely to justify a very great intensification of bus service over the Plan Period.

#### *4.8.2. T38 Coventry Road/Spinney Hill Roundabout*

Stagecoach welcomes the recognition that the east-west movement across Coventry Road is by far the more significant on the public transport network, and bus priority approaching and across this junction is highly desirable, to maintain journey times and overall service reliability on Gold G1.

## **4.9. A429 Stratford Road, Warwick**

### *4.9.1. Current conditions*

This corridor will see a significant increase in bus movements as result of a strategic realignment of Stagecoach's inter-urban network in June 2016. Three buses per hour will run between Leamington Warwick and Stratford: two via Barford and Wellesbourne, and one via the direct route north of the Avon along the A46/B439. Local service to Hatton Park will also be retained on part of the corridor.

### *4.9.2. Modelled Future Conditions*

Stagecoach notes with considerable concern that a 25% increase in delay is forecast by WSTA in the morning and evening peaks on the approach to the Longbridge Interchange (para 6.31 and 6.33), which are among the most notable specific deteriorations in conditions highlighted by the WSTA model.

The fact that the Model is unable to pick up detail adequately is noted and recognised. Likewise Stagecoach accepts that mitigations are likely to be identifiable in due course.

Nevertheless, given the fact that this represents the main public transport corridor to Stratford direct or via Wellesbourne, there is a case for bus priority westbound on the A429 on approaches to Longbridge to be considered and brought forward as part of a mitigation package. This may take the form of bus detector loops operating in conjunction with any new signals provided to control access onto the circulatory carriageway from this arm.

## **4.10. A46-M40 Strategic Road Network (SRN) Corridor Improvements**

### *4.10.1. General Commentary*

It needs underlining that a significant proportion of bus routes in the Plan area operate not just across the SRN (thus being affected by delays at junctions, most notably Longbridge and Thickthorn), but along it. The length of the A46 between Thickthorn and Coventry is especially important and is used by up to 20 Stagecoach buses per hour in each direction.

Employment growth on and near this corridor is strong and this is likely to continue. Indeed it may well intensify as land south of Whitley is brought forward, and at Stoneleigh Park, to add to the committed growth at University of Warwick and Westwood. Bus services already offer a credible mode choice from large parts of the Plan area to these destinations, especially at peak times. However building on this offer demands that reliable journeys can be provided. If they can be, there is every reason to believe that the increase in bus journeys and a virtuous spiral of public transport use, would permit expensive highways capacity interventions being delayed if not entirely avoided.

## **4.11. Kenilworth improvements**

### *4.11.1. General commentary*

As stated in our introduction, the substantial allocations north of the A46 and adjacent to Coventry City Boundary have come forward before a great deal of detailed work on the potential and necessary mitigation has been possible.

The scale of proposed development and its impacts is such that very substantial and costly interventions look likely to be needed.

Positively, works at the Gibbet Hill crossroads recently completed within Coventry City seem to have had a noticeable and positive impact on peak traffic conditions and journey times. However there is evidently a limit to how far iterative further improvements are either possible or likely to prove cost-effective.

The frequency of bus services between Leamington, Kenilworth and the southern fringes of Coventry, is already such that a mode shift strategy towards inter-urban buses is a credible option. Further increases in patronage and frequency could drive a positive spiral of bus use, especially if frequency improvements can be matched with competitive journey times and reliable arrivals.

#### **4.12. Sub-Regional Employment Site South of Coventry**

The Coventry and Warwickshire Gateway proposals clearly will be taken forward through this Local Plan. Stagecoach is well aware that the main reason that the Secretary of State did not elect to confirm the previously submitted proposals, was on the now clearly-established principle that strategic releases of land from the Green Belt need to be justified through duly-made Local Plans. The support of all the Local Authorities to this proposal is recognised and understood.

The previous proposals, on which a renewed application for permission in due course will no doubt build, represents a very substantial expansion of, and consolidation of employment in the Whitley and Baginton areas.

Stagecoach is also aware of aspirations to further expand Stoneleigh Park as a centre of excellence for rural technologies.

The previous "Gateway" proposals offered a comprehensive package of transport infrastructure crossing the City boundary, which was already agreed with both Coventry city council and WDC/WCC. Much of this would have direct benefit to existing employers in the area, especially JLR Whitley, which Stagecoach already serves with services at key times. Stagecoach is thus quite confident that, alongside strategic highways improvements on the A45 A46 and A444 being delivered at this time, that the immediate impacts of this proposal can be accommodated and that high-quality bus services can be facilitated. Indeed the fact that these improvements follow on from the committed Highways England works in many ways gives greater confidence about their deliverability.

However, the strategic allocation proposed at Kings Hill will need to benefit from direct bus links to the site, and bus services ought to be considered to be among the default modes for residents wishing to access existing and new employment in this area. Stagecoach also urges that care is taken to provide for high-quality bus services to this area from Leamington and the south, which may in fact need to use the A445 or other non-classified roads.



Stagecoach has an existing relationship with Roxhill-SEGRO, the main promoters of the scheme and we look forward to working to refine the proposals for this scheme in due course, as appropriate.

**5. Stagecoach Midlands Representations on Proposed Modifications to the Warwick District Local Plan**

**PART A**

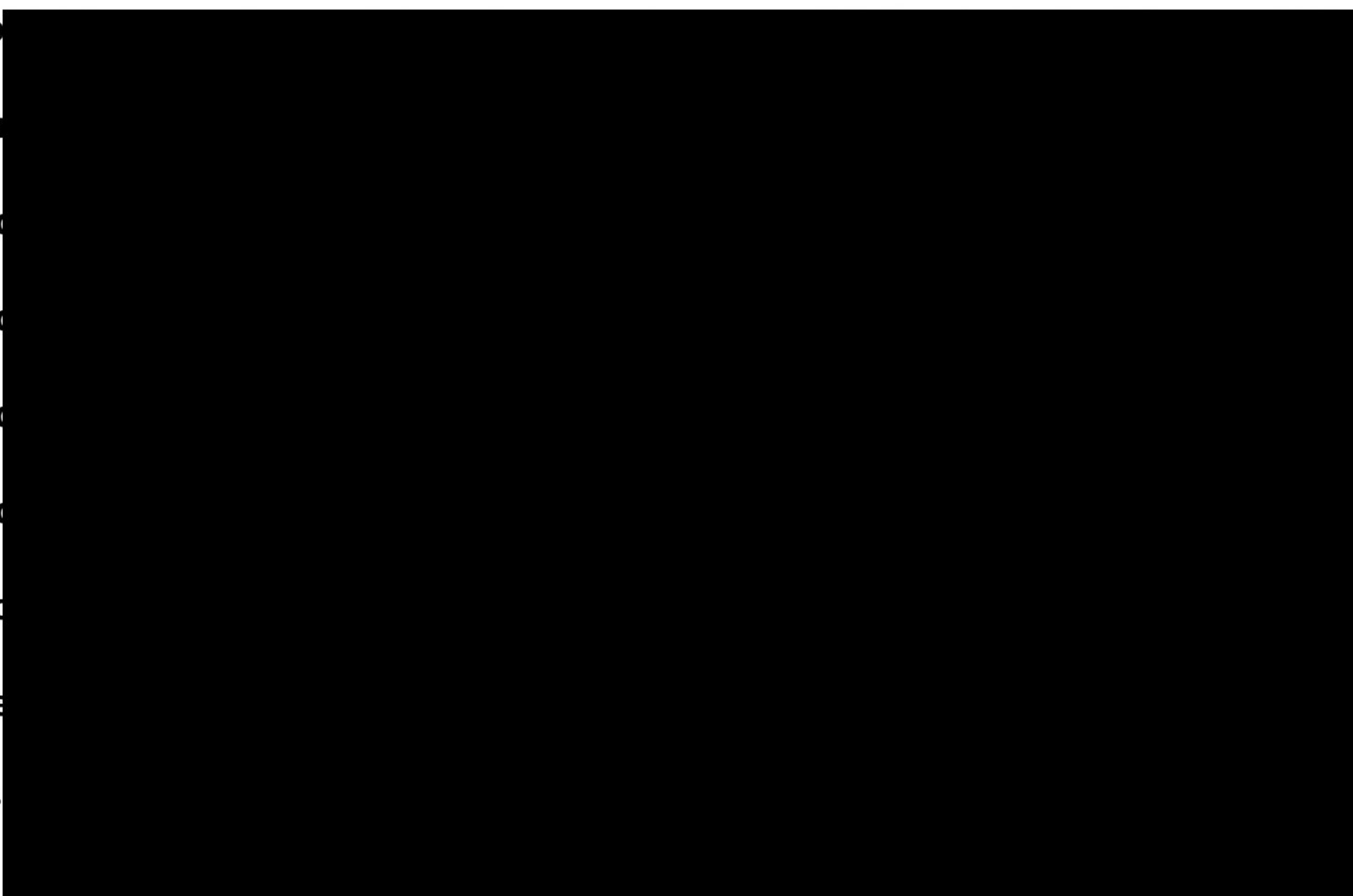
**1) Personal details**

**Title:** Dr.

**First Name:** Nicholas

**Last Name:** Small

Job (st)  
Office  
Address  
Address  
Address  
Address  
Postcode  
Telephone  
E-mail



**2) Agents details**

NOT APPLICABLE

**3) Notification on subsequent stages of the Local Plan:**

I DO wish to be notified when the proposed Modifications are submitted to the duly-appointed Inspector

I DO wish to be notified of the publication of the recommendations of any person appointed to carry out an Independent inspection of the Local Plan

I DO wish to be notified when The Local Plan is adopted

## PART B

### 4) Mod 10 Policy DS 11 Allocated Housing Sites

#### H43 Kings Hill (Finham SUE)

- 5)
  - i Stagecoach considers the Plan **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **sound** in respect of this Modification
- 6) N/A

Stagecoach **supports** the proposed modification allocating this site.

Stagecoach recognises that of the candidate sites for strategic growth on the edge of Coventry within Warwick District, this is evidently one of the most sustainable when all material matters are considered. Stagecoach considers that as WDC looks to Plan positively to meet Coventry City's unmet OAN, this site is likely to represent among the best choices when all reasonable options are considered. Proximity to the Gateway site, JLR Whitley and the University/Westwood, and potential connectivity towards such development that might occur at Stoneleigh represents a location advantage that suggests sustainable modes could, with careful and effective planning, account for a much higher proportion of trips than most other options.

However, there is a great deal of work to be done to ensure that the transport and traffic impacts of this development, both within the Plan period and beyond, are appropriately provided for, not least in terms of avoiding even more serious delays at the Gibbet Hill Crossroads, on the A45/A429 junction, and the A46 Stoneleigh Interchange.

The comments in the WSTA (F) underline the fact that transport mitigations for proposed allocations in this area are far from being precisely identified (para 4.42-4.44). It also points out (para 4.43 p 29) that further growth within Coventry City on the University site and at Westwood, anticipated in the Coventry City Plan, will place its own additional demands on transport infrastructure in this area. Stagecoach confirms that peak congestion in this area is chronic and acute.

The conclusion of WSTA (F) based on the conclusion of supplementary modelling presented in WSTA (F) Appendix A, is that the improvements of the Stoneleigh Road/A46 interchange "*should be seen as a starting point for delivering a wider strategy for improving connectivity between the A46, north Kenilworth, Warwick University and the Tile Hill/Westwood Heath housing areas south of Coventry. This could be in the form of capacity enhancements applied to the existing road network or, alternatively and longer term, provision of additional capacity in the form of a new link road which can connect some or all of the areas identified earlier.*" (para 4.46 p.30)

Stagecoach emphatically agrees. Indeed, without further work to determine the feasibility and affordability of such a strategy (which we argue should also include comprehensive bus priority), then the proposed allocations are unlikely to be demonstrably sound, having regard to NPPF paragraph 17 and paras 29-32 .

Stagecoach recognises potential for rail station provision, and notes the explicit reference in the Schedule of additional sites to junction improvements on the A46 at Stoneleigh. However, while a rail service from the site would help to mitigate impact on road links to the City Centre and on the

local SRN, which would be highly desirable, it is not entirely clear if a new station is technically achievable.

Bus facilities are mentioned in the most broad-brush of terms. Effective provision will need to be made cross-boundary, to provide high quality, efficient and direct bus routings towards local destinations, in particular the University and Westwood; JLR Whitley and other existing, committed and potential employment in the Whitley/Baginton area; and towards Stoneleigh and Leamington. Stagecoach would be pleased to assist WDC, WCC, Coventry City Council and Centro in identifying how these can be provided.

The number of peak trips associated with education is well known to be a major contributor to morning peak congestion in particular, and is now starting to contribute to poor traffic conditions being experienced in the afternoon for a much longer period from 1500h onwards, across most of our urban operating areas. Stagecoach therefore strongly supports the principle of local provision of school places close to where the need arises and thus encourages the identification of a secondary school site within the allocation, and given the long-term scale the site offers, considers it important that this is suitably protected for educational use through the Plan period and beyond.

## PART B

### 4) Mod 10 Policy DS 11 Allocated Housing Sites

#### H42 Westwood Heath (East of Bockendon Road)

- 5)
  - i Stagecoach considers the Plan **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **sound** in respect of this Modification
- 6) N/A

Stagecoach **supports** the proposed modification allocating this site.

Stagecoach well recognises the serious constraints imposed by local highways capacity on further development in this area as discussed above, and the results of modelling work supplementing WSTA ph 4 in this area and presented in WSTA (F).

Much depends on how far the very modest capacity headroom that exists will not actually be taken up by developments north of Westwood Heath Lane and at the University, within Coventry City.

The principle of bringing this land forward to meet Coventry's unmet OAN looks broadly sound to Stagecoach, when land use considerations are evaluated. Close proximity to the University and employment at Westwood Heath as well as secondary school provision, weighs strongly in favour of this land being identified for release from the Green Belt.

However, without a higher degree of scrutiny as to how a comprehensive access and movement strategy can be brought forward in support of development, the fact that a better option does not look very obvious does not mean that the draft allocation is sound *per se*. "Positive planning" in the sense set out in NPPF requires that these transport issues are addressed during Plan-making and not left hanging for later consideration, with an inadequate policy basis to inform Master Planning and the approach to developer contributions, among other things.

As discussed for Kings Hill/Finham, Stagecoach notes and strongly endorses the comments in WSTA (F) para 4.46, and urges that work is undertaken at the earliest opportunity to define a comprehensive movement and access strategy to be developed across the boundary with the City Council and Centro.

PART B

**4) Mod 10 Policy DS 11 Allocated Housing Sites**

**H40 East of Kenilworth (Crewe Lane, Southcrest Farm)**

- 5)        i Stagecoach considers the Plan **legally compliant** in respect of this Modification
- ii Stagecoach considers the Plan **sound** in respect of this Modification
  
- 6)        N/A

Stagecoach **supports** the proposed modification allocating this site.

Stagecoach notes the proposed allocation of up to 640 dwellings, alongside the relocation of the Kenilworth secondary school/sixth form to an adjoining site, on which consolidated and enlarged facilities can be provided. It is intended the current school sites would be released for housing development. This involves the release of land from the Green Belt.

Stagecoach recognises that constraints on the growth of Kenilworth exist that make it hard to find capacity elsewhere. The site also relates to a good degree to the previously proposed allocation at Thickthorn further south, and access to both on an arcuate route provided by Glasshouse Lane could be provided.

However, this does extend the Kenilworth built-up area still further away from existing public transport routes. In terms of bus services this is focused on X17, running every 15 minutes.

When the two major allocations proposed are considered alongside existing adjoining development, and the existing street pattern that could be the basis for bus network development, then a considerable quantum of demand is identifiable. Almost 1400 new dwellings are envisaged, which would add to a comparable existing number east and west of Windy Arbour and south of Leyes Lane. To this can be added the proposed augmented secondary school provision, which on its existing site currently provides a meaningful demand for service X17. It is realistic to conclude that a sufficiently frequent service could be provided linking the sites south and east of Kenilworth to Coventry and Leamington, to be both commercially sustainable and a reasonable alternative to personal car use.

However it is much harder to see how such a service could also serve Kenilworth town centre, without being extremely indirect and undermining longer-distance demand.

Stagecoach is ready to work with stakeholders as required to establish how the optimum pattern of public transport could be secured for the allocations and wider area as part of a wider strategy of network development north of Leamington.

PART B

**4) Mod 10 Policy DS 11 Allocated Housing Sites**

**H41 Kenilworth, East of Warwick Road**

- 5)
  - i Stagecoach considers the Plan **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **unsound** in respect of this Modification
- 6) Stagecoach considers the Proposed Modification to be Inconsistent with national policy, specifically NPPF paragraphs 17 and 29-35.

Stagecoach **objects** to the allocation of this site as part of the Proposed Modifications

Stagecoach notes the proposed allocation of 100 dwellings here, involving the release of land from the Green Belt.

The site is not on an existing high-quality public transport corridor, and proposed changes to the network in the area will lead to the reversion of services in the near vicinity to only every hour. After having experimented with the introduction of much more regular services in the near neighbourhood over the last three years, these have not generated sufficient patronage to be sustainable. The proposed allocation is of entirely insufficient scale to anchor a critical mass of demand sufficient to sustain any great improvement of service.

The proposal is thus likely in practice to be significantly more car dependent than other potential sites, and land north of Milverton in particular.

## PART B

### 4) Mod 10 Policy DS 11 Allocated Housing Sites

#### H44 North of Milverton

- 5)
  - i Stagecoach considers the Plan **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **sound** in respect of this Modification
- 6) N/A

Stagecoach **supports** the Proposed Modification allocating this site.

Stagecoach notes the proposed allocation of up to 250 dwellings here during the Plan period, involving the release of land from the Green Belt. It is also proposed to remove from the Green belt, and safeguard for delivery beyond the Plan Period, the potential capacity of up to 1,065 further dwellings. The site also includes the provision for a Park and Ride facility on the A452 Corridor (Draft IDP reference T22)

Stagecoach notes the rationale for allocating this land, set out among other places at Policy DS11, and in Appendix 5 to the Proposed Further Modifications. The Company also notes that this site was previously proposed as an allocation by WDC in an earlier version of the Local Plan. It is thus a site that WDC officers have recognised scores very highly on sustainability grounds. Stagecoach welcomes its reinstatement in the Plan, and this comes as no great surprise given the strength of the material considerations weighing in favour of its release.

Specifically, as the Plan and its supporting evidence makes clear, this site benefits from being well located with respect to employment and services in Warwick and Leamington on the one hand, and Coventry on the other. Very importantly, it also provides for diversity of supply in support of robust delivery of the OAN. The site helps provide and benefits from strategic infrastructure, including that to be provided on the A452 north of Leamington. Stagecoach recognises and strongly endorses the merit of WDC's logic.

To these important and weighty matters weighing in favour of the release of the land from the Green Belt in this location Stagecoach would add that the site would both deliver, and be able to take advantage of, the Park and Ride facility, and associated comprehensive improvements to the A452, including bus priority.

We see no clear reasons why delivery of land from this site should be held back to beyond 2031. Indeed, given the singular advantages that releasing this land offers, over other potential releases such as East of Whitnash in particular, Stagecoach would support the case to release the majority of the site, if not the whole, for delivery within the Plan period.

Dependent on master planning and the potential for a bus route link towards the western end of the site, the scope is likely to exist for a new high quality bus spine running from Leamington Parade via Clarendon Square and Guy's Cliffe Avenue, directly serving the site and Park and Ride, and then running on towards Kenilworth, or Warwick University/Coventry, or some other combination. This service would significantly improve connectivity by bus to a significant existing neighbourhood north



of Rugby Road in Leamington. In so doing, there is scope to offer attractive bus journey times to destinations north of Leamington that today can only credibly be reached by car. This in turn offers, in the view of Stagecoach, additional potential mitigation of the traffic impacts of the site in terms of “trip banking”. One benefit would be to provide radically more attractive public transport options to students at the Trinity Catholic School, which serves the whole Plan area.

The release of the majority, or all of the site, during the Plan period also makes the funding and delivery of major capacity enhancements on the A452 corridor that much more certain, at an earlier stage, as well as facilitating the Park and Ride.

Land for the P+R could be provided at the eastern end of the proposed allocation, as close as possible to the A452 and designed to allow for existing bus services to divert in and out with minimal delay and circuitry. Such arrangements already exist and operate successfully elsewhere, such as at Redbridge south of Oxford, which is served by very frequent buses running between Oxford and Abingdon, and towns beyond. As we have pointed out elsewhere in our representations, the corridor past the site benefits from an exceptional frequency of service offered to a full range of destinations, as well as to Leamington Town Centre. This is a highly credible location for the “virtual Park and Ride” concept to be delivered, which needs no reliance on a bespoke bus service.

Buses returning on the Unibus operation to Leamington from Warwick University pass the site and the capacity they offer, running very frequently, could easily be used to provide an attractive service to Leamington Town Centre and Station. Most of these buses already offer free wi-fi, and other passenger amenities, and Stagecoach will replace the remainder of the Unibus fleet with state-of-the-art new vehicle this year.

In fact the University of Warwick in and of itself represents a major and growing employment hub. When further employment existing at Westwood nearby is considered there is potential for P+R users to ride with the peak flow out of Leamington. Likewise, Stagecoach is to further invest in its X18 express service running past the site non-stop to Whitley at peak time, and then on to Coventry City Centre. It is clear that the potential Park and Ride site here could allow for the substitution of a great number of peak journeys that currently use not only the A452, but the SRN beyond. It is for exactly these reasons that Stagecoach has supported the delivery of such a facility and is keen to see its delivery as soon as possible within the Plan period.

PART B

**4) Mod 10 Policy DS 11 Allocated Housing Sites**

**H45 Hazel Mere and Little Ash, Whitnash**

- 5) i Stagecoach considers the Plan to be **legally compliant** in respect of this Modification
- ii Stagecoach considers the Plan **unsound** in respect of this Modification
- 6) Stagecoach considers that the Modification is unsound in respect of Land at Hazel Mere/Little Ash as it does not consider the Plan has been positively prepared, and that the Plan has demonstrably fully considered all the reasonable alternatives, to accommodate the housing requirement in the most sustainable way. Stagecoach believes that the Plan fundamentally pre-judges Green Belt releases to be less sustainable potential locations for development, without having due and full regard to all the relevant material matters that should weight in the planning balance. Stagecoach believes that the evidence shows that other sites considered for development offer more a more sustainable way of meeting the development required within the Plan period.

Stagecoach **objects** to the identification of this site for development.

This land stretches away from existing bus service and facilities, that are already relatively distant, by unnecessarily extending the built up area in a lobate form. There is no prospect whatever for the provision of effective or attractive public transport to serve the site within close proximity. In any case it is not clear why allocating yet more land to the south of the urban area supports either a diversity of supply, or the need to match the location of housing supply more closely to where the demand arises. This suggests that locations elsewhere, and certainly north of Leamington, are to be preferred.

The speed at which land in the near vicinity is coming forward as part of the southern SUE, does not suggest that there is any great need for this land to be released to support the boosting of supply in the short term. While Stagecoach accepts that the land could be delivered quickly, developer experience makes clear that there is likely to be a limit as to what the local housing market can absorb within a relatively small geographic area; thus, this site would probably tend to dilute the rate of sale achievable on other sites within the SUE.

## PART B

### 4) Mod 10 Policy DS 11 Allocated Housing Sites

#### H46A Land South of Gallows Hill

- 5)
  - i Stagecoach considers the Plan **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **sound** in respect of this Modification
- 6) N/A

Stagecoach **supports** the proposed modification allocating this site.

Stagecoach notes that the area has been proposed in a previous version of the Local Plan by WDC. The unconsented portion of this land has been subject to a previous, withdrawn application. The Company is aware of the considerable debate surrounding the landscape impacts of allocating this and the adjoining sites consented at Appeal.

The remaining land benefits from being adjacent to major employment at the Technology Park, and is also within walking/cycling distance of a range of employment and services, including Warwick town centre and existing and proposed secondary school provision. Gallows Hill will see considerable improvements in local bus services associated with the wider SUE, of which this in effect forms a logical part. Sustainable modes can therefore credibly meet a much higher proportion of the travel demand arising from the site, than other sites.

Stagecoach supports the proposed allocation of the additional land.

## **PART B**

### **4) Mod 10 Policy DS 11 Allocated Housing Sites**

#### **H46B Land at the Asps**

This land is now, in effect a commitment. Stagecoach has no further comment to make, beyond those made in support in previous representations, except that the long-term provision of the best possible bus service in the Southern SUE, and a sustainable and attractive high frequency park and Ride offer from the southern Park and Ride facility to be provided by the applicant, demands the synergies offered by the “virtual” Park and Ride concept originally proposed by WCC.

## PART B

### 4) Mod 10 Policy DS 11 Allocated Housing Sites

#### H03 Land East of Whitnash

- 5)
  - i Stagecoach does not consider the Plan to be **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **unsound** in respect of this Modification
- 6) Stagecoach considers that the Modification is unsound in respect of Land east of Whitnash, as it does not consider the Plan has been positively prepared, and that the Plan has demonstrably fully considered all the reasonable alternatives, to accommodate the housing requirement in the most sustainable way. Stagecoach believes that the Plan fundamentally pre-judges Green Belt releases to be less sustainable potential locations for development, without having due and full regard to all the relevant material matters that should weight in the planning balance. Stagecoach believes that the proposed allocation East of Whitnash is fundamentally less sustainable than other sites considered for development to meet needs within the Plan period.

Stagecoach **objects** to the identification of an additional 199 dwellings on this site as part of the Proposed Modifications.

Stagecoach has already made representations that this site does not proffer a location that can credibly be served by high quality public transport. We do not therefore see that bus services could be sustained on a commercial basis to this site sufficient to offer a credible mode choice to avoid the promotion being amongst the most car dependent in the urban area.

The Company notes that the area has been proposed for allocation consistently, albeit with wildly varying numbers of dwellings proposed. The site cannot overcome its inherent limitations, even with an additional 199 units allocated, as far as provision of credible mode choices are concerned. 499 units is entirely insufficient to support the provision of even a single additional vehicle resource to serve this site on a commercial basis in the long term. There is no obvious means of combining such future demand as would arise from this site with additional demands elsewhere on a logical route. As it is, the access road from Sydenham Drive through the School site will involve about 1km of route running in each direction with no hinterland from which to draw patronage, while the footprint of built development is such that further significant mileage will need traversing within the allocation to provide all residents with convenient access. Up to 4km of route will be involved on each round trip, to serve just 500 homes. Any residents in the Golf Drive area west of the railway would be unlikely to cross the line given they already have a service within similar reach to the west operating every 10 minutes.

The site, in every sense, is a dead end, with residents having to cross the urban area to reach jobs and most services, in all probability by car.

Indeed, Stagecoach also notes that WCC and WDC are not even convinced that the site, with an enlarged allocated quantum, can support a new primary school. If not, then it is highly likely that even higher levels of car traffic at morning peak will leave the site to reach primary schools spread

widely across the urban area south of Leamington and Warwick, aggravating pressure on the network.

Were a high quality spine road to have been provided through two successive recent developments constructed by the promoter to the north at St Fremunds Way, and to the south, then the merits of this site in terms of bus service provision would be rather greater, though still not especially good. At least a single route serving a neighbourhood of about 1000 dwellings could have been offered, and this would no doubt have been viable at a meaningful frequency of, say, about every 20 minutes, or even a little better. It suited the promoter's planning strategy at each successive stage not to protect the potential to create such a spine to serve this promotion in such a manner.

It is of particular concern that secondary education provision is to be part of the solution arrived at for the Southern SUE, despite the fact that this proposal simply does not relate well to the wider urban form. We are unclear if Campion School is to be extended as part of the necessary reconstruction to facilitate access to this site. This would be necessary if additional education-related trips are not to be needlessly added to the local highways network.

Stagecoach believes that allocation of other sites, in particular those supporting and taking advantage of the Park and Ride and improvements North of Leamington, can provide for a better range of housing sites, better related to jobs and services, that can be more obviously and straightforwardly delivered.

PART B

**4) Mod 10 Policy DS 11 Allocated Housing Sites**

**H02 (part) Land South of Harbury Lane at Lower Heathcote (southern extension)**

- 5) i Stagecoach considers the Plan **legally compliant** in respect of this Modification
- ii Stagecoach considers the Plan **sound** in respect of this Modification
- 6) N/A

Stagecoach **now supports** this additional allocation south of the commitment at Lower Heathcote.

Stagecoach **withdraws its previous objections** to land being identified more than 400m south of Harbury Lane. Stagecoach has previously made representations that extension of the urban area greatly south of Harbury Lane could be difficult if a comprehensive high quality public transport solution is to be provided.

Since that time, the Design Guidance and associated Master Plan for the Southern SUE has been prepared and adopted, while the vast majority of the adjoining land is either consented and being brought forward, or is proposed for allocation (former STW). The rounding off of the Southern SUE in this way is rational, and the promoter has clearly made provision in the master plan for the consented site of 785 units, to seamlessly include this land in due course.

Stagecoach Midlands is now satisfied that the Community Spine Road south of Harbury Lane will offer, subject to detailed design at Reserved Matters stage, a high quality bus route within 400m of all dwellings on this site. Indeed the CSR all but requires this land to come forward to support its provision, and ensure that the proposed allocation on the STW immediately to the east, and that portion of Grove Farm lying beyond it, can be effectively served by a high quality bus route as the SUE Master Plan intends.

Stagecoach therefore supports this land coming forward as an integral part of the Southern SUE.

**PART B**

**4) Mod 11 Policy DS11 rationale (Appendix B of Proposed Modifications)**

See Commentary on individual sites as part of representations on Mod 11 Policy DS10.



## PART B

### 4) Mod 12 Policy DS12 Land for Education

- 5)
  - i Stagecoach considers the Plan **legally compliant** in respect of this Modification
  - ii Stagecoach considers the Plan **sound** in respect of this Modification
- 6) N/A

Stagecoach notes the allocation of land at ED1 East of Kenilworth (Southcrest Farm) and ED2 (Land at Myton) for secondary education provision, and, if necessary and appropriate additional primary provision.

With regard to ED2 at Myton, Stagecoach notes that part of the existing school site adjoining Myton Road, that had been previously allocated for housing development (125 units Appendix B ref H01 (part)) is now retained in educational use to accommodate this need.

Stagecoach supports this change, as it will provide for a site that can readily be accessed by sustainable modes from two major movement corridors: Myton Road to the north and the SUE Community Spine Road to the south/east. As a result, the pressure that the combined secondary (and possibly primary school) Campus will place on local Highways infrastructure is likely to be much better spread and managed. It will also allow the site to be served by several bus routes, offering a full range of destinations to cater for pupils with residences across the Plan area, as required.

Stagecoach urges that suitable bus stop facilities, including off-street bays, to accommodate special school services are provided as part of any proposals. The scale of provision is also likely to demand careful planning of transport. It is likely that the Campus could account for well over 400 school staff alone, before pupils are considered, for example, making it a significant employment destination in its own right. A Campus-wide Travel Plan should be prepared as part of a planning application for the extension and/or development of further school capacity on this site. This should take full account of movements of entitled and non-entitled pupils, and ensure that student, staff and parental trips, and parking requirements, are catered for in a way that minimises the negative impacts on the local and wider highways network.

PART B

4) **Mod 20 Policy DS NEW 1 Directions for Growth South of Coventry**

5) i Stagecoach considers the Plan **legally compliant** in respect of this Modification

ii Stagecoach considers the Plan **sound** in respect of this Modification

6) N/A

Stagecoach supports the allocations at Kings Hill (Finham) and at Westwood Heath.

These provide for housing to meet Coventry City's unmet OAN, in locations that are clearly well related in every sense to existing and future employment growth. Thus there will be clear opportunities for the use of sustainable transport modes to be maximised.

PART B

4) **Mod 21 Policy DS NEW 1 Directions for Growth South of Coventry**

5) i Stagecoach considers the Plan **legally compliant** in respect of this Modification

ii Stagecoach considers the Plan **sound** in respect of this Modification

6) N/A

Stagecoach notes, and recognises the logic set out in the proposed explanatory text. It is nevertheless most important that urgent attention is paid to ensuring the transport strategy in support of the new allocations both protects and takes advantages of the opportunities for sustainable transport to the greatest extent possible, and in so doing has regard to the opportunities to create sustainable inter-connectivity to the Proposed Regional Strategic Employment Allocation.

This will need to have careful regard to urban design, not least to facilitate efficient and attractive direct bus routes. Where possible such links should ensure that buses are offered more direct and preferential routings than general motorised traffic, and where possible and appropriate, bus-only links and gates should be considered to provide seamless bus advantage to and through the development footprint.

Stagecoach notes and especially welcomes the recognition in Paragraph 1.3 of the explanatory memorandum that *“There will also be the opportunity to deliver infrastructure improvements that should not only benefit the new development but, if properly designed and delivered in a timely fashion, may also help to alleviate existing problems on the local and strategic transport network”*. The Company urges that development phasing be especially carefully considered to ensure that high quality bus services are facilitated from the earliest possible stages of development, and that in so doing, any scope to achieve mode shift from existing development in the bus corridor overall is taken up. In so doing, additional headroom in local transport capacity is likely to be achieved to assist in accommodating the needs of the new development.

Stagecoach also notes and endorses the approach set out at paragraph NEW 1.4, where cross-boundary establishment of strategic parameters and objectives will be set, to align the delivery of schemes while allowing promoters to fully explore the detailed Master Planning of individual sites. This is logical and represents a suitably pragmatic and judicious approach to ensuring that development proposals can come forward in parallel with appropriate infrastructure and services. This approach is further elaborated upon in para. NEW 1.09.

Stagecoach would be pleased to support the Councils and promoters in arriving at such objectives and assisting with the more detailed development of transport strategies and Master Plans in due course.

PART B

**4) Mod 22 Policy DS NEW 2 Safeguarded Land**

5) i Stagecoach does not consider the Plan to be **legally compliant** in respect of this Modification

ii Stagecoach considers the Plan **unsound** in respect of this Modification

6) Stagecoach considers that the Modification is unsound in respect of Safeguarded Land at Milverton, as it does not consider the Plan has been positively prepared, and that the Plan has demonstrably fully considered all the reasonable alternatives, to accommodate the housing requirement in the most sustainable way. Stagecoach believes that the Plan fundamentally pre-judges Green Belt releases to be less sustainable potential locations for development, without having due and full regard to all the relevant material matters that should weight in the planning balance. Stagecoach believes that the is likely to be a case to release a greater a part, or all, of the Land at Milverton (SD2/H44) to meet needs within the Plan period.

Stagecoach supports the release of the land identified in the Plan from Green Belt, to ensure that development needs are addressed in the Plan Period, and to ensure in line with National policy, that enduring boundaries for the Green Belt are established that will permit development needs to be met beyond the Plan period.

Stagecoach considers that the modified Plan Strategy is essential to ensure that housing need is provided for close to where it arises, having regard to wider constraints.

Stagecoach in particular supports the identification of land North of Milverton (H44) as a sustainable location to meet the needs of the area, and argues that this land is a better and more sustainable alternative, especially in transport terms, than continued development in progressively less-sustainable locations outside the Green Belt.

Therefore Stagecoach urges that land at ref S.2/H44 North of Milverton should be considered to meet a larger quantum of that need arising within the Plan period.

8)

Stagecoach considers that the Plan should be changed to allocate at the least that quantum currently proposed for Land East of Warwick Road, Kenilworth (100 units), Land at Hazel Mere (75 units), and Land East of Whitnash (499 units) (TOTAL approx 675 units in addition to the 250 already allocated), to be accommodated North of Milverton within the Plan Period.