

Coventry Local Plan Review

Regulation 19

Proposed Submission (Publication) Stage Representation Form

(guidance note below)

Our Ref: NH/25/09629

(For official use only)

Name of the Plan
to which this
representation
relates:

**Coventry Local Plan Review – Regulation 19 Proposed
Submission (Publication)**

Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025 email to planningpolicy@coventry.gov.uk, via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:
www.coventry.gov.uk/planningpolicyprivacynotice

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

~~Please fill in a separate sheet for each representation you wish to make.~~

Part A

Personal Details*

Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Patrick	
Last Name	Thomas	
Job Title	Operations Directorate Midlands	
(where relevant)		
Organisation	National Highways	
(where relevant)		
Address Line 1	The Cube	
Line 2	199 Wharfside Street	
Line 3		
Line 4	Birmingham	
Post Code	B1 1RN	
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation: **National Highways**

1. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Statement of Memorandum of Understanding

A Statement of Memorandum of Understanding (MoU) was agreed in 2019 between NH and CCC under the Duty to Co-operate requirements of the Localism Act 2011. The aim is to provide a position statement for both parties in respect to the Local Plan 2041. Underlying the MoU is a commitment to work together with CCC to facilitate necessary transport infrastructure and support the housing growth identified in the plan.

Model agreement and Transport Evidence Base

The MoU between CCC and NH confirms that the Coventry Area Strategic Model (CASM) is the existing model agreed to date (previously agreed in June 2019). This will however be replaced by the Coventry Strategic Modelling Tool (CSMT), although it is noted that the CSMT was not available within the timeframe needed to support the Local Plan. The model is expected to serve as an appropriate basis to understand the cumulative impact of the Local Plan growth and strategically assess the transport impacts of the Local Plan. The relevant parties should continue to work together to assess specific impacts in more detail and agree the outcomes of the modelling, which will later determine the required interventions/

mitigations to support the proposed growth without resulting a significant impact on the SRN.

NH previously advised that once the preferred development strategy was chosen, we would need to review the impacts in regard to the SRN and discuss the infrastructure requirements, we are unaware of this being done to date and we fail to agree on the proposed transport model as we have seen no evidence to support growth demands up to 2041, which has been validated from our side.

We would like CCC to confirm the existing transport model which supports the growth demands up to 2041, as well as the evidence showcasing how this has been validated. Sensitivity tests can be provided with the background information on how the previous CASM model which we validated in 2019 based on a 2013 base year to support the previous local plan has transformed into the current model which supports the updated local plan. It is our understanding that the technical note from November 2024 has been used as a placeholder to give an overview of the CSMT based on the CASM modelling to showcase the potential impact on the network for 2041.

NH has now been made aware that the CASM will be replaced by CSMT, although it is noted that the CSMT, has not been reviewed by NH and we have not been involved in any discussions and development of the model update. We would therefore need to gain a clear understanding on what has been done to date and to what extent does it include the SRN network and the potential impact before we agree on the methodology and consider the potential impact on the SRN network along the M6 and A46.

We are currently unable to make a judgment on the soundness of the Local Plan until we have been provided with further information in relation to the transport evidence base.

It is also noted the A46 Coventry Junctions (Walsgrave) Scheme has not been included within the coded within the CASM 2041 Baseline (Table 1 - transport-modelling-technical-note). The Scheme currently has allocated funded through the Road Investment Strategy 2 (RIS2), and the Development Consent Order (DCO) application currently is in the pre-examination stage, with a decision on the DCO expected in 2026. In addition to this, the potential of Walsgrave Hill Farm (site ref. H2:3) in close proximity to the SRN, the Council are encouraged to consider adding the A46 Coventry Junctions (Walsgrave) Scheme. National Highways are also willing to supply any information or data to allow this, due to the advanced stage the project.

1. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

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(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Local Plan Overview

We note that the CCC adopted its current Local Plan and accompanying Area Action Plan (AAP) for the City Centre in December 2017. We acknowledge that the Local Plan is getting updated as part of the 5-year review process to understand the amendments/ updates required for the adopted documents.

The Regulation 19 (Proposed Submission) consultation document outlines the overall development needs for CCC in Policy DS1, and the requirement to deliver a minimum of 60ha of employment land to meet local needs within the city's administrative boundary and 1,455 dwellings per year, which equates to a total of 29,100 additional dwellings over the plan period of 2021 to 2041.

These include some of the following key sites in the vicinity of the SRN;

- Keresley Sustainable Urban Extension (SUE) (site ref, H2:1) – up to 3,100 dwellings;
- Walsgrave Hill Farm (site ref. H2:3) – up to 900 dwellings; and
- Land at Whitmore Park, Holbrook Lane (site ref. H2:4) – up to 730 dwellings.

NH have reviewed the Local Plan document, and we have also reviewed a number of complimentary reports which are set out as follows:

- Infrastructure Delivery Plan (Appendix 7);
- Transport Background Paper (November 2024);
- Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022);
- Review of Coventry's Local Housing Need (June 2024); and,
- Transport Modelling Technical Note - CASM 2041 Local Plan (November 2024).

In principle NH broadly welcomes developments within the existing urban area. Trips generated by developments within this area have the possibility to remain internal to the town and/or make use of sustainable transport options and therefore may have a smaller impact on the wider SRN than development in alternative locations. However, larger key sites, still have to be considered on their own merit and assessed accordingly to consider their impact during the construction and operational phase.

Furthermore, NH supports development on the rail transport corridor and other public transport developments which could encourage longer distance trips to make use of more sustainable methods of transport and therefore alleviate the pressures posed by new developments on the existing SRN and therefore reducing the need for interventions/ mitigations to support the proposed growth. NH, therefore, considers that a well-integrated and significant sustainable transport provision is essential to ensure that these sites as well as those in relatively isolated areas do not become overly reliant on car use.

Policy Review

National Highways have undertaken a high-level review of the policy wording of the larger sites which may have an impact on the operation of the SRN, specifically focusing on the sites which are strategically located in closer proximity to the SRN.

These include some of the following key employment sites in the vicinity of the SRN;

- Binley Business Park;
- Cyan Park;
- Swallowgate Business Park; and,
- Whitley Business Park.

Upon the review of the Employment Land Review, the document states “87% of the current committed employment land supply is on allocated sites without planning permission. These sites were allocated in the current Coventry Local Plan which was adopted in 2017. In reviewing whether it is appropriate to carry these existing allocations forward to the emerging Local Plan, the Council should reassess their suitability, deliverability and alignment with the overarching spatial strategy”,

Furthermore, the total land need set out in the HEDNA (2022) states a requirement of 156ha over the emerging local plan period, up to 2041, of which 71ha has not yet been planned for. NH would like to understand how the allocated

sites have been incorporated into the modelling and what approach has been used to assess the further need which is required by 2041. We would promote ongoing discussions to understand the allocations which will be put forward as part of the updated local plan.

It should be noted that any potential site identified through the Local Plan process, which is anticipated to have an impact on the SRN in the area should be subject to consultation with National Highways, and appropriately assessed in line with the DfT's Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Further to this, it is to be noted that the cumulative impact of the proposed site allocations also needs to be undertaken in line with the Circular for understanding the likely traffic impacts on the SRN in the area in terms of capacity and safety, and, identifying any possible mitigation measures (if required).

1. To which part of the Local Plan Review does this representation relate?

Paragraph Policy

Infrastructure Development Plan
(Appendix 7)

1. Do you consider the Local Plan Review is:

(1) Legally compliant

Yes

☒

No

☐

(2) Sound

Yes

☒

No

☐

(3) Complies with the
Duty to co-operate

Yes

☒

No

☐

Please tick as appropriate.

2. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Infrastructure Development Plan (Appendix 7)

The Infrastructure Development Plan (IDP) aims to set out the infrastructure required to accommodate the anticipated growth and how this is to be delivered. Appendix 7 provides an overview summary of what an IDP document is and focuses on highways, public transport and supporting accessibility infrastructure which have been identified by modelling which was used to identify the range of schemes that will be essential to the delivery of the new homes and jobs across Coventry. NH would like to get a better understanding and evidence behind the transport modelling that supports this local plan.

The Infrastructure Delivery Plan proposes a number of schemes relevant to the SRN in and around the CCC area. We recognise the Council's proposals for a number of multi-modal transport schemes to provide greater choice of sustainable transport options, including implementing cycleways, light rail and new rail stations across the city. We acknowledge that the provision of these services particularly in areas adjacent to the SRN (such as Binley, Coventry South & Willenhall) is likely to reduce private car trips on the SRN, therefore is supported by NH.

It is noted that the Coventry Very Light Rail (CVRL) scheme would expand the range of multi-modal travel options to access key sites across the city. NH would be keen to engage with the Local Planning Authority (LPA) to understand the

interaction of wider CVLR proposals with the SRN, including ambitions to extend the scheme into Ansty Park.

Out of the 44 transport related schemes listed within the IDP, three are related to the enhancements along the M6 and A46. As stated within the document, the schemes represent “clear commitments to using infrastructure to unlock growth not just for Coventry but jointly with Nuneaton and Bedworth and Rugby Borough Councils respectively”, therefore displaying the on-going commitment to the Duty to Cooperate between neighbouring Councils, the County Council and NH. As a statutory consultee, NH require engagement on any development that impacts the SRN, specifically this applies to the following IDP proposals as these are located on our SRN network:

- A46 Walsgrave Junction Improvements;
- A46 Strategic Link Road; and
- M6 Junction 3 Improvements.

NH would like to gain a better understanding behind the funding for the schemes as well as the status of each, as it is unclear if these are committed schemes. We would also like to understand any potential gaps in the funding for the proposed developments.

We would also like to understand any interlinkages between the various schemes and the potential causation effect if one of the proposed schemes is not followed through, and how this could impact the funding and fruition of other schemes.

Similarly, NH is aware of our funding towards the A46 Coventry Junctions (Walsgrave) DCO scheme (TR010066), which was accepted for examination in December 2024. However, we are not leading the improvements related to the other two schemes on the SRN network.

It should be noted, for any developments which have an impact on neighbouring Local Authorities, NH advises a joined up approach in which NH, Coventry and the other LAs attend the same meeting with the future developer or applicant. This will ensure all parties interests are protected and a combined solution is derived during the planning process.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Transport Evidence Base

As outlined in our response above, we are currently unable to make a judgment on the soundness of the Local Plan until we have been provided with further information in relation to the transport evidence base.

A46 Coventry Junctions (Walsgrave) Scheme

As stated above, the A46 Coventry Junctions (Walsgrave) DCO scheme (TR010066) was accepted for examination in December 2024. Should it be granted consent, the Scheme will provide much needed improvements to the A46 and provide benefits to the SRN and surrounding local road network.

National Highways would like to clarify a number of points in the Local Plan, in relation to the Scheme:

Coventry Local Plan	Comments
<p>12.12 “Further improvements are planned at Brandon Road and Walsgrave near the B4082 to introduce grade separation to improve traffic flow”</p>	<p>The grade separated junction is on the A46 mainline, with a new section of B4082 built to connect Clifford Bridge Road with the A46. Suggest revision to the text to accurately reflect the proposed Scheme:</p> <p>“Further improvements are planned at Brandon Road and Walsgrave, <u>with the introduction of a new section of B4082 connecting to a grade separated junction on A46, which will improvement traffic flow</u>”.</p>
<p>Local Plan Appendices – Appendix 7 Infrastructure Delivery Plan</p> <p>P.30 – “In addition, a new grade separated junction will be created on the A46 near Walsgrave Hill Farm to support new development access and secure a blue light access to the city’s hospital.”</p>	<p>It should be clarified that the National Highways A46 (Walsgrave) Scheme is not proposing to deliver the blue light access route as part of the Scheme. The design of the Scheme, specifically the western dumbbell roundabout of the grade separate junction, has allowed for an additional arm to added and delivered by others in the future.</p> <p>Suggested revision to the text to accurately reflect the proposed Scheme:</p> <p>“In addition, a new grade separated junction will be created on the A46 near Walsgrave Hill Farm to support new development access <u>and to allow for a blue light access to the city’s hospital to be added to the western dumbbell in future by others.</u>”</p>
<p>Local Plan Appendices – Appendix 7 Infrastructure Delivery Plan</p> <p>P.33 – “The proposed secondary/blue light access and additional parking facilities will also be supported through development at Walsgrave Hill Farm and the remodelling of the A46 junction at Clifford Bridge.”</p>	<p>As above, the A46 (Walsgrave) Scheme is not proposing to deliver the blue light access route as part of the Scheme, but the design of the junction will allow for an additional arm to the delivered in future by others.</p> <p>Suggested revision to the text to accurately reflect the proposed Scheme:</p> <p>“The proposed secondary/blue light access and additional parking facilities will also be supported through development at Walsgrave Hill Farm <u>and the design of the new A46 Walsgrave junction will allow for an additional arm to the added to the western dumbbell roundabout.</u></p>

P.49 (Infrastructure Delivery Plan) – “Planned junction upgrade to improve journey times on a key strategic route” Timescale 2027/28+	The A46 (Walsgrave) Scheme currently has an Open for Traffic date projected for May 2028.
It should be noted that the Local Plan refers to “Highways England” throughout the Local Plan document.	It is requested that these references be amended to “National Highways” to reflect the organisational name change in 2021.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

n/a

Please add any further comments relating to the SA report in the box below

n/a

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓

No, I do not wish to
participate in
hearing session(s)

☐

Yes, I wish to participate
in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.