

Our ref: SHARE/WD LPlan
Your ref: Local Plan

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Dear David

**PLANNING AND COMPULSORY PURCHASE ACT 2004 THE TOWN AND
COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 -
REGULATIONS 19 AND 20
SUBMISSION WARWICK DISTRICT LOCAL PLAN - NOTICE OF CONSULTATION
ON PROPOSED MAIN MODIFICATIONS**

Thank you for your consultation on the above referenced Local Plan modifications received on 11 March 2016.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). This network is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. The proposed Local Plan modifications have the potential to impact on the SRN, in this case the M40 motorway and the A46 and A45 trunk road corridors.

We have reviewed the proposed main modifications and have no specific comments on the document other than that Highways England should be included in those bodies with which Warwick District Council propose to co-operate on the delivery of the development proposals south of Coventry (see last paragraph on page 18 relating to Policy DS New 1).

The Council does not appear to have included an updated Infrastructure Development Plan (IDP) to support the additional housing proposals identified in this modifications consultation. As the developments associated with the proposed modifications could result in a material traffic impact on our network we feel that we should raise the matter of an updated IDP.

We are aware that Warwickshire CC has prepared an updated Strategic Transport Assessment (STA) to determine the impact of the proposed Local Plan modifications on both the local and strategic highway networks.

JMP Consultants Ltd carried out a review of the updated STA modelling report prepared by Vectos for Warwickshire CC and provided comments to Warwickshire CC on behalf of Highway England on 25 February 2016. The modelling report included an Appendix with a proposed update to the IDP. We feel it is worth reiterating JMP's comments back to Warwickshire CC as they are relevant to the proposed Local Plan modifications. Those comments were:

"We note that additional mitigation affecting the operation of the SRN, particularly along the A46 corridor, has been identified as likely to be required to meet the proposed Coventry housing shortfall. These include the upgrade of the A46 Stoneleigh and Thickthorn junctions and, by implication, the possible upgrade of the A46 corridor between Leek Wootton and M40 junction 15. In our opinion it would be prudent to clearly identify these schemes, in part, as necessary to meet the Coventry housing shortfall and the costs apportioned accordingly.

We are content with the new scheme entries for the A46 corridor in the draft Updated IDP (STA Appendix B) but they should reflect the fact that Highways England does not have funding in the foreseeable future for these schemes and therefore they would expect a significant proportion of the costs to be met by developer contributions and / or from other funding sources. We note that the proposed improvement to the A46 Stanks junction and associated improvements to the A425 corridor and their funding have now been identified as committed.

In addition to reviewing the Updated IDP we have looked back at the January 2015 IDP to check the entry for the proposed Sub-regional Employment Site on land to the south of Whitley Business Park. Whilst this refers to the planning application for C&W Gateway and the works required for the development, there is the caveat; "The requirements may vary depending on the precise configuration of any proposal [that comes forward]". This is fine for the recently submitted Coventry CC / Jaguar Land Rover planning application, but we suggest the reference to the C&W Gateway application be removed as the application was rejected by the Secretary of State.

We also note that the additional sites to the south of Warwick and Leamington could result in the M40 Capacity Enhancements included in the draft IDP (January 2015) being required a little sooner than previously anticipated."

I trust you find these comments helpful, please feel free to contact me if you wish to discuss this response in more detail.

Yours sincerely



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