

Document Reference 2.7

Town and Country Planning Act 1990

Acquisition of Land Act 1981

Local Government (Miscellaneous Provisions) Act 1976

Inquiry into:

**THE COUNCIL OF THE CITY OF COVENTRY (CITY CENTRE SOUTH) COMPULSORY
PURCHASE ORDER 2022**

and

Town and Country Planning Act 1990

Stopping-up of public highway

Proof of Evidence

of

Russell Vaughan

Director for Transport Planning Practice Ltd

On behalf of the Council of the City of Coventry

29 December 2022

1. INTRODUCTION

1.1 My name is Russell Vaughan. I am a Director at Transport Planning Practice (TPP), a company where I have worked since May 2006. Prior to joining TPP I worked in the transport planning department of Capita Symonds (formerly Symonds Group). I have a BSc in Physical Geography and a BEng in Civil Engineering.

1.2 During over 20 years in the transport planning team I have advised mainly private sector clients on a wide range of commercial, residential, retail and leisure developments. During this time some of the salient jobs I worked on include:

- *Liverpool One City Centre redevelopment - The comprehensive retail led redevelopment of part of Liverpool City Centre.*
- *Ealing Cinema mixed use development – A residential led scheme on a constrained site with retail at ground floor, which centred on the renovation of the existing cinema.*
- *Southall Riverside – A dense residential led scheme with ancillary community and retail elements.*
- *Icon at The O2 – A retail outlet centre with complicated servicing and delivery arrangements.*
- *Linnere, Houghton Regis – Circa 5,000 homes, schools, retail and community uses, being phased over a number of years*

1.3 I have also worked on a number of stopping up orders, the most recent of which include the pedestrian area in front of Lion Yard shopping centre in Cambridge and two currently live applications in the City Of London relating to office developments.

1.4 TPP was appointed by Shearer Property Regen Limited (“**SPRL**”) to prepare a Transport Assessment (“**TA**”) and associated supporting documentation for the Coventry City Centre South re-development. I have provided transport advice on this scheme since 2019.

1.5 I have worked closely with the architects on both the development and the evolution of the scheme to ensure that the scheme’s transport requirements are integrated into the overall design, and as such these elements are closely aligned to the design principles set out in Mr Maxwell’s Proof of Evidence (DR2.2).

2. SCOPE OF EVIDENCE

2.1 I give evidence on behalf of SPRL on the justification for the Council of the City of Coventry (City Centre South) Compulsory Purchase Order 2022 (“**CPO**”), and in support of the following

applications for stopping up of highway pursuant to section 247 of the Town and Country Planning Act 1990 ("**TCPA**"):

- 2.1.1 Application One: Stopping Up of Rover Road and Queen Victoria Road (part) (Draft Order Ref: WM5256) (DR4.2)
 - 2.1.2 Application Two: Stopping Up of Warwick Row (part) (Draft Order Ref: WM5257) (DR4.3)
 - 2.1.3 Application Three: Stopping Up of Queen Victoria Road (part) (Draft Order Ref: WM5258) (DR4.1).
- 2.2 My evidence considers the traffic, highways and servicing requirements for the scheme underlying the CPO and the case in support of each of the three applications for the stopping up of highway.
- 2.3 In particular, my evidence addresses matters of access (pedestrian and cycle), car parking, disabled parking and the re-provision of the existing Shopmobility facility, cycle parking, the provision for taxi ranks, access for emergency service vehicles, coach parking and servicing, with particular regard to the servicing of the existing Coventry Market where the proposed servicing solution has been varied in response to objections to the CPO received from Royal London as owner of the headlease of the Market. My evidence also considers the impact of the scheme (both during the construction and the operational phases of the scheme) on the local highway network. My evidence additionally supports the making of the three stopping up orders, setting out the case for the making of the orders. I have set out responses to the objections received to each of the stopping up orders at paragraphs 7.14 to 7.20 below.
- 2.4 In my evidence I consider the above matters in the context of both the currently consented scheme and also as it is proposed to be varied by way of a pending application pursuant to section 73 of the TCPA.
- 2.5 In my proof of evidence references to the Core Documents are made by the abbreviation, for example, "DR1.1". Specific abbreviations are noted in the text on first use, and these abbreviations are also set out in the CCS Proofs Glossary (DR2.9). The proofs of evidence of other witnesses are referred to by the name of the author.

3. **PROPOSED SCHEME**

Consented scheme

- 3.1 The scheme is consented by a hybrid planning permission granted on 27 January 2022 (reference OUT/2020/2876) ("**2022 Permission**") (DR3.2(a)) as amended by s.96A non-material amendment, reference NMA/2022/2523, dated 11 October 2022 (DR3.6) (the "**Consented Scheme**"). The Consented Scheme provides for the demolition of the existing

retail and office development, and the city centre car parks within the redline planning application boundary (the “**Site**”) and the provision of:

- *900-1300 C3 Residential units;*
- *22,000m² – 37,500m² of Use Class E Commercial, Business and Service / Use Class F.1 Non-Residential Institutions / Sui Generis (Cinema / Pub or Drinking Establishment / Hot Food Takeaway Uses)*
- *A Hotel development, comprising circa 150 bedrooms;*
- *90-300 residential and operational car parking spaces; and*
- *the removal of the existing Coventry Market basement ramp, with the provision of a new ramp directly accessed from Queen Victoria Road.*

Refined scheme

3.2 An application has been submitted pursuant to section 73 of the TCPA (reference S73/2022/3160) which was validated by the local planning authority on 11 November 2022 (DR3.7) (“**S73 Application**”). The S73 Application seeks to vary the conditions attached to the 2022 Permission (as amended) in order to refine the Consented Scheme (“**Refined Scheme**”). The Refined Scheme provides for the demolition of the existing retail and office development, and the city centre car parks within the Site, and the provision of:

- *900-1500 C3 Residential units;*
- *13,275m² – 20,000m² of Use Class E Commercial, Business and Service / Use Class F.1 Non-Residential Institutions / Sui Generis (Cinema / Pub or Drinking Establishment / Hot Food Takeaway Uses)*
- *A Hotel development, comprising circa 150 bedrooms;*
- *90-300 residential and operational car parking spaces.; and*
- *the removal of the existing Coventry Market basement ramp, with the provision of a new ramp directly accessed from Queen Victoria Road.*

3.3 The S73 Application is a hybrid planning application with the built form submitted in outline. It would be unreasonable to assess the proposed development based on its maximum parameters as the total of these maxima would exceed the quantum of development permitted and therefore would not be a realistic scenario to assess. The Transport Assessment submitted in support of the S73 Application has therefore been based on a development scenario for the Revised Scheme as this represents a justifiable scenario that can be more

accurately assessed. However, in order to provide a robust assessment of the proposals, the residential aspects have been assessed on the maximum parameter of 1,500 units and additional office space has been included in the assessment.

Access

Pedestrian and cycle

3.4 Both the Consented and the Revised Schemes provide for pedestrian and cycle access to the Site to be from:

- *Queen Victoria Road via the realigned Rover Road to be renamed as Rover Walk;*
- *Coventry Market which also links to Lower Precinct Shopping Centre;*
- *The existing route of Market Way, linking to Lower and Upper Precinct;*
- *The existing route of Hertford Street, linking to Broadgate;*
- *Warwick Road / New Union Street into what is currently known as Bull Yard; and*
- *The realigned City Arcade car park access to be renamed as Lower Market Way.*

Car and service vehicle

3.5 The exact number of car parking spaces will be determined at reserved matters application stage. Vehicle access to the parking and servicing bays will be via the locations as set out below:

- *Barracks Way as per the existing situation for the Block B service yard and a residential car park;*
- *the realigned City Arcade car park access to be renamed as Lower Market Way for the Block C service yard and car park; Block D service area and car park; and a small amount of on-street parking;*
- *via the existing service route to the north of Coventry Market via the Lower Precinct service yard;*
- *Service access routes directly from Queen Victoria Road.*

Cycle parking

- 3.6 For both the Consented Scheme and the Refined Scheme, cycle parking will accord with the standards set out in the Coventry Local Plan 2017, Appendix 5, Car and Cycle Parking Standards for New Development (DR3.9).
- 3.7 The visitor cycle parking will be located at 'access points' to the development to allow visitors to cycle directly to the development but not cycle through the pedestrianised areas. As part of the detailed design these cycle parking locations will be reviewed to ensure they are in convenient locations to maximise potential cycle use. Some parking areas will also include mini bike repair stations with robust permanent cycle pumps. The visitor cycle parking will be located to make best use of the radial cycle routes which provide cycle access to the city from its outer areas. This is in-line with Local Plan policy AC4: Walking and Cycling and Chapter 5 of the Coventry Connected SPG (DR3.9).

Taxi ranks

- 3.8 As part of the realignment and proposed pedestrianisation of Rover Road, the existing taxi stand for three Hackney carriages is to be re-provided on Warwick Road by utilising the loading lay-by outside the Reform Club. This lay-by will no longer be required as the majority of deliveries will be able to take place from the rear of the properties.
- 3.9 A review of the taxi survey data within the Consented Scheme Transport Assessment indicates that the maximum existing number of boarders per hour between 07:00 – 19:00 for the Rover Road taxi stand on a weekday is 42 persons. The Consented Scheme is predicted to generate up to 2 additional taxi person trips per hour on a weekday. This provides an overall total of 44 taxi person trips per hour. Assuming a worst case of 1 person boarding each taxi equates to an assumed usage of 44 taxis per hour.
- 3.10 The Saturday taxi survey data indicates that the maximum existing number of boarders per hour between 07:00 – 19:00 for the Rover Road taxi stand is 45 persons. As with the weekday, the Consented Scheme is predicted to generate up to 2 additional taxi person trips per hour on a Saturday. This provides an overall total of 47 taxi person trips per hour. Assuming a worst case of 1 person boarding each taxi equates to an assumed usage 47 taxis per hour.
- 3.11 Based on the above, during the peak periods the assumed usage results in a taxi leaving circa every one / one and a half minutes. The three space taxi rank can accommodate a rolling cycle of two taxis leaving every minute whilst still providing spare capacity for the third taxi. On this basis the taxis would be able to cycle through the rank every few minutes, with additional taxis arriving at the rear of the rank as the full vehicles leave. This indicates the proposed taxi stand is adequate to supply the maximum predicted demand expected for the

Consented Scheme. The Refined Scheme has been assessed to generate a similar albeit lower number of new taxi trips and so the findings of the original assessment remain valid.

- 3.12 In addition to the proposed taxi rank on Warwick Road, other options are being investigated, although it is noted that any future designs will need to tie in with the wider highway schemes that are being proposed by Coventry City Council. Options in the vicinity of the Market include:

- *The western side of Queen Victoria Street adjacent to the Ikea*
- *The eastern side of Queen Victoria Street north of Rover Road*
- *North side of Croft Road*

- 3.13 Due to the potential for Very Light Rail (VLR) to be implemented along Queen Victoria Street, the highway arrangement may change substantially and therefore these designs would be dependent on them being able to be accommodated within the VLR scheme which is not yet available. Once the VLR proposals are agreed, potential additional taxi ranks can be reviewed in more detail.

Car parking

- 3.14 Both the Consented Scheme and the Refined Scheme will remove all public car parking within the boundary of the Site and there is no intention to re-provide public car parking elsewhere, either within or off the Site. Coventry currently has a large car parking supply within the city centre with tariffs that are unlikely to encourage modal shift to more sustainable forms of transport.
- 3.15 The development scenario assessed within the Consented Scheme Transport Assessment provides a total of 174 residential and operational car parking spaces. These are located in three car parks, with 130 spaces within Block B, 8 in a parking area outside Block C and 36 within Block D.
- 3.16 The Refined Scheme development scenario assessed within the Transport Assessment addendum submitted in support of the S73 Application will provide a total of circa 115 residential and operational car parking spaces. These will be located in three car parks, with 56 spaces within Block B, 29 within Block C and 29 associated with Block D.
- 3.17 The residential parking provision within both Schemes has been based on disabled parking requirements, operational needs, site constraints and expected requirements.
- 3.18 The Refined Scheme continues to be based on the same principles as the Transport Assessment approved pursuant to the 2022 Permission. To help formulate the proposed parking provision the following points were considered:

- *Space constraints within each Block.*
- *Discussions with potential Build-to-Rent operators with regard to their requirements and operational needs.*
- *The possible accessible parking provision for the scheme.*
- *The desire for family homes to have access to a car parking space.*
- *The provision of car club bays.*
- *Accessible and key staff parking spaces for certain uses such as the medical centre.*
- *The desire to provide the minimum adequate quantum of parking to avoid use of the surrounding car parks by those unable to operate / work without access to a car, e.g. plumbers, electricians, care workers etc.*

3.19 As per Policy EM7 of the Local Plan (DR3.9) and the emerging Air Quality SPD (DR3.11), an allocation of spaces will have an electric vehicle charging point. SPRL are also reviewing the allocation of a number of the bays to car clubs to facilitate more sustainable travel and minimise car ownership. This is in-line with the Coventry Connected SPG section 4.3.8 (DR3.12).

Shopmobility

3.20 As part of the demolition of the Barracks car park, the existing Shopmobility provision will need to be relocated. SPRL has submitted a separate detailed planning application for a new shopmobility facility on land at Salt Lane Car Park in Coventry City Centre (which is outside the Site- but nearby). The application was validated on 15th December 2022 with reference PL/2022/0000181/FUL. This application was pending determination at the time of drafting my evidence.

Disabled parking

3.21 In addition to the disabled residential parking being provided as set out above, public disabled parking provision will continue to be provided following the relocation of the Shopmobility, with Salt Lane car park providing accessible parking spaces close to the Site. The existing provision of disabled parking spaces within the Rover Road service area to the south of the Market will be re-provided on the roof of the Market. This re-provision is secured by a condition attached to the 2022 Permission (DR3.2(a)) which is proposed to be replicated for any permission granted pursuant to the S73 Application for the Revised Scheme.

Emergency access

- 3.22 As part of the overall vehicle access design strategy for both Schemes, emergency vehicle access has been considered throughout.
- 3.23 Both Schemes have been designed so that a standard fire tender will be able to access all areas of the Site that they are required to.

Coach parking

- 3.24 The Scheme is unlikely to require coach parking. Notwithstanding this, White Street Coach Park is located to the north east of the Site and has capacity for seven coaches and is accessible from junction 2 of the A4053 Ringway.

Servicing

- 3.25 The proposed servicing strategy for both the Consented and the Refined Scheme uses existing points of access from the local highway network where possible. The servicing vehicle trip generation and required number of service vehicle bays has been calculated for Light Goods Vehicles (LGVs) and Heavy Goods Vehicles (HGVs) and these have been assessed with regard to their impact on the highway network. Servicing of each of the blocks will be reviewed and dealt with in more detail within the reserved matters applications.
- 3.26 SPRL and TPP have consulted with Royal London, the operators of the Lower Precinct shopping centre, with regard to servicing for their development, the northern element of the Market, and Block A2. Feasibility options have been worked up to demonstrate the capability to service all three locations and tabled at meetings with Royal London. These are discussed in more detail below. These in principle arrangements can be further refined at the Reserved Matters stage.

Block A1 and A2

- 3.27 Block A1 will be serviced from a lay-by provided on Queen Victoria Road. Based on the servicing trip generation analysis, it is expected that the lay-by will need to be sufficiently sized to accommodate one HGV or two LGVs. The Refined Scheme proposes that the lay-by will be able to accommodate a 16.5m articulated vehicle, thereby satisfying this requirement.
- 3.28 Under the Consented Scheme, servicing could also take place from the proposed Rover Walk to the south of the block during the allocated servicing times. This would not be possible under the Refined Scheme as this area will become fully pedestrianised.
- 3.29 Block A2 will be serviced via the Lower Precinct service area to the north of Coventry Market. This route is already used to service this area and the eastern side of the Market. This route provides unrestricted service access.

- 3.30 Based on TPP's servicing trip generation analysis for the Consented and Refined Schemes, it is expected that sufficient servicing space will need to be provided to accommodate one HGV or two LGVs for Block A2. This can be accommodated in the Consented Scheme from the public realm adjacent to Block A2 in a similar manner to the existing situation.
- 3.31 Since submission of the Consented Scheme, Mayer Brown, appointed on behalf of Royal London, have identified a peak accumulation of three service vehicles at one point during the busiest day of their assessment (see further paragraph 6.4 below). Whilst I still believe that two bays represents an adequate provision, three bays can be accommodated within the Refined Scheme which provides one large bay (capable of accommodating a 10m rigid lorry) and two smaller delivery bays (capable of accommodating a van or supermarket delivery vehicle) as indicated below.

Figure 3.1 – Block A2 servicing arrangement



- 3.32 The service bays have been positioned in locations so as to minimise their impact on the existing pedestrian routes. The large bay is positioned behind a planter which directs

pedestrians around the loading bay, whilst the smaller bays are located off the pedestrian route. It should be noted that this area (and the rest of the Rover Road service area) is currently shared between pedestrians and service vehicles. The new proposals reduce the number of vehicles in this area, thereby reducing potential conflict.

- 3.33 In addition, in both schemes Block A2 could also be serviced from the Block B service yard via the corridor running to the north of Block B. This route may be more appropriate for smaller deliveries such as those undertaken by couriers.

Block B

- 3.34 Based on the Consented Scheme servicing trip generation analysis, it is expected that 9 LGV and 5 HGV bays would be required to provide servicing facilities for Block B and the retained retail units to the north. This level of provision does not require any undue management of the service yard. The loading space within Block B could be further optimised, albeit that the minimum requirement will always be provided.
- 3.35 The Revised Scheme provides for Block B to be serviced from a basement service yard accessed via the Barracks Way underpass which currently provides servicing access for retail units located within the Site on Bull Yard, Market Way and Hertford Street. The existing service yard also provides loading facilities for retail units located to the north of the Site on Market Way, Hertford Street and Upper Precinct. These units will continue to be serviced from the Block B service yard in addition to the proposals for Block B. The proposed service yard will be sufficiently sized to accommodate the expected servicing demand.

Block C

- 3.36 Block C will be serviced from a dedicated loading area located at ground level either to the south of the block (Consented Scheme) or under the building (Refined Scheme) and accessed via the realigned City Arcade car park access to be renamed as Lower Market Way. This service area will also be used to service the Pavilions (Block E) via a dedicated trolleying route. The proposed service yard will be sufficiently sized to accommodate the expected servicing demand.

Block D

- 3.37 In the Consented Scheme vehicles will access Block D via a service road accessed from the realigned City Arcade car park access to be renamed as Lower Market Way. Two lay-bys will be provided on the service road for loading, with some ancillary servicing / waste collection taking place from Queen Victoria Road.
- 3.38 In the Refined Scheme a service area will be provided under the building at ground level. Subject to further design work as part of the Reserved Matters application it is proposed that

the service area is accessed off a new service road running between Queen Victoria Road and Lower Market Way.

Block E (Pavilion)

- 3.39 In the consented scheme the Pavilion will be serviced by vehicles stopping to load alongside the building on the pedestrianised area surrounding it. Access to this area will be restricted, and vehicles will circulate the building in a one-way 'anti-clockwise' loop to allow vehicles to pass those already loading.
- 3.40 Access to the pedestrianised area will be from a controlled access point at the northern end of the realigned City Arcade car park access road to be renamed as Lower Market Way. Egress will be via the realigned Rover Road to be renamed as Rover Walk. Vehicles will join Queen Victoria Road via an adjusted signalised junction with Croft Road.
- 3.41 In the Refined Scheme the Pavilion will be serviced from the service area in Block C via a dedicated trolleying route.

Coventry Market

- 3.42 Whilst Coventry Market does not form part of the development proposals, the area to its east and south will be re-landscaped to provide an improved pedestrianised area where there is currently service vehicle access.
- 3.43 The servicing of the Market is discussed in more detail in paragraph 6 below.

Servicing Summary

- 3.44 The proposed development (both the Consented Scheme and the Refined Scheme) will provide sufficient servicing facilities to accommodate the demand on-site and will provide on-site turning facilities where required. This is in-line with Local Plan policy AC7: *Freight* (DR3.9) and Chapter 8 of the Coventry Connected SPG (DR3.12).

4. SCHEME IMPACT

- 4.1 The trip generation for both the Consented and the Refined Schemes was based on the agreed person trip rates obtained from the TRICS database to derive person trips for each existing and proposed land use. As the proposal involves the redevelopment of existing retail and offices uses, which currently generate person trips, the number of person trips estimated for the existing site have been deducted from the person trips predicted for proposed development. This provides the net impact of person trips associated with the development proposals.
- 4.2 Due to the minor alterations to the scheme and the expected quantum of different land uses between the Consented and the Refined Scheme there have been changes to the expected trip generation. For the Refined Scheme, the expected increase in residential trips is more than off-set by the reduction in the retail elements and this has led to an overall reduction in trips by all modes, including servicing, in comparison to the Consented Scheme.
- 4.3 The information in paragraphs 4.4 – 4.7 relate to the Consented Scheme and paragraphs 4.8 – 4.10 relate to the Refined Scheme.

Weekday trip generation – Consented Scheme

- 4.4 The total net person trip generation for the development proposals on a weekday for the vehicular impact assessment peak hours is shown in Table 4.. This focuses on the key AM and PM highway peak hours as this is when the impact on the highway would be greatest. The table also summarises the daily trip generation.

Table 4.1: All uses net total person trips across development – Weekday

Time	Arrivals	Departures	Total
09:00-10:00	187	509	696
17:00-18:00	968	375	1,343
Daily (07:00 – 19:00)	4,864	4,689	9,553

- 4.5 As can be seen from Table 4., there would be 4,864 new person arrivals across a 12 hour period between 07:00 – 19:00 and 4,689 new departures resulting in a total of 9,553 new person trips on a weekday.

Saturday trip generation – Consented Scheme

- 4.6 The total net trip generation for the development proposals on a Saturday for the vehicular impact peak hour (14:00 – 15:00) is shown in Table 4.43. The table also summarises the daily trip generation.

Table 4.2: All uses net total person trips across development – Saturday

Time	Arrivals	Departures	Total
14:00-15:00	291	367	658
Daily (07:00 – 19:00)	4,466	3,771	8,237

- 4.7 As can be seen from Table 4.43, there would be 4,466 new person arrivals across a 12 hour period between 07:00 – 19:00 and 3,771 new departures resulting in a total of 8,237 new person trips on a Saturday.

Weekday trip generation – Refined Scheme

- 4.8 The total net person trip generation for the development proposals on a weekday for the vehicular impact assessment peak hours is shown in Table 4.. This focuses on the key AM and PM highway peak hours as this is when the impact on the highway would be greatest. The table also summarises the daily trip generation.

Table 4.3: All uses net total person trips across development – Weekday

Time	Arrivals	Departures	Total
09:00-10:00	-74	315	241
17:00-18:00	973	245	1,218
Daily (07:00 – 19:00)	3,076	2,904	5,980

- 4.9 As can be seen from Table 4., there would be 3,076 new person arrivals across a 12 hour period between 07:00 – 19:00 and 2,904 new departures resulting in a total of 5,980 new person trips on a weekday.

Saturday trip generation – Refined Scheme

- 4.10 The total net trip generation for the development proposals on a Saturday for the vehicular impact peak hour (14:00 – 15:00) is shown in Table 4.43. The table also summarises the daily trip generation

Table 4.43: All uses net total person trips across development – Saturday

Time	Arrivals	Departures	Total
14:00-15:00	12	82	94
Daily (07:00 – 19:00)	2,112	1,310	3,422

- 4.11 As can be seen from Table 4.43, there would be 2,112 new person arrivals across a 12 hour period between 07:00 – 19:00 and 1,310 new departures resulting in a total of 3,422 new person trips on a Saturday.

Highway Network Impact Assessment

- 4.12 This sets out the principles of the impact assessment undertaken on the highway network for the Consented Scheme as this has the greatest impact on the transport modes. The same principles apply to the Refined Scheme albeit the trip generation, and therefore the impact, is lower.

Traffic distribution

- 4.13 A traffic distribution model has been built to apply the predicted net vehicular trip generation including service vehicles for the proposed development to the existing vehicle flows on the assessed highway network.
- 4.14 The development vehicle trip generation has been applied and distributed onto the local highway network based on each development block's location in relation to the A4053 Coventry Ringway junctions and professional judgement. Vehicle trips associated with car parking currently within the Site has been redirected to Salt Lane car park.

Scope of assessment

- 4.15 The traffic model includes links to the A4053 Coventry Ringway Junctions 5, 6, 7, 9 and 10. The assessed road network does not connect to Junction 8 of the A4053 Coventry Ringway as this junction only connects to Hollywell Road, which is external to the Ring Road and would therefore not carry any traffic generated by the scheme.
- 4.16 The broad rules set out by the Institute of Environmental Management and Assessment guidance state that an assessment should be undertaken on highway links where traffic flows will increase more than 30% (or the number of heavy goods vehicles will increase by more than 30%) and to include any other "specifically sensitive" areas where traffic flows have increased by 10% or more. The traffic model indicates that, for both the Consented and Refined Schemes, the predicted traffic flows on links to junctions on the A4053 Coventry Ringway and the increase in vehicles on the A4053 do not meet these criteria and therefore they do not need to be assessed. The scope of the junction modelling assessment was discussed and agreed with Coventry City Council (CCC) Highways.

Cumulative schemes

- 4.17 The Local Planning Authority agreed to the number of cumulative schemes being reduced for the Refined Scheme based on the results of the cumulative assessment for the Consented

Scheme demonstrating no impacts. The cumulative schemes included within the impact assessment submitted in support of the S73 Application were:

- *54-57 Hertford Street*
- *Plot C06 Friargate*
- *Former Gala Bingo, Fairfax Street*
- *Land at the corner of Queens Road, York Street and Butts Road*
- *Land off Abbots Lane and Upper Hill Street*
- *Sandy Lane Industrial Estate.*

Traffic growth

- 4.18 The year of opening for the Consented Scheme is 2027 and for the Refined Scheme is 2037. The relevant traffic growth rates have been obtained from the DfT's TEMPro software to extrapolate the baseline traffic flows to the proposed year of opening.

Summary

- 4.19 The proposed mitigation, by way of alterations to the required junctions, comprises acceptable mitigation as agreed with the Highway Authority. These designs will be refined further as part of the Reserved Matters Applications and will take into account other considerations including the Council's preferred junction types and its general approach to discouraging traffic in the City Centre.

5. CONSTRUCTION TRANSPORT IMPACT MITIGATION

- 5.1 A Demolition Traffic Management Plan (DTMP) and Construction Traffic Management Plan (CTMP) will be prepared and submitted in support of the first reserved matters application. This is in-line with Local Plan policy AC7: *Freight* (DR3.9) and Chapter 8 of the Coventry Connected SPG (DR3.12). The 2022 Permission (DR3.2(a)) includes conditions to secure the DMP and CMP, with separate DTMPs and CTMPs being required for each of the individual construction areas / blocks/phases. The DMPs and CMPs will include vehicle routeing and the expected vehicle trip numbers and the expected number of staff per development phase. These conditions will be replicated in any permission granted pursuant to the S73 Application for the Refined Scheme.
- 5.2 However, it is anticipated that all construction vehicles will, as far as reasonably possible, use the national strategic road network and Coventry's primary roads to access the Site. All vehicles will arrive and depart via the A4053 Ringway, but the junctions used will depend on

each development site. Therefore it is expected the following Ringway junctions will be used for each development block:

- *Block A Junction 7*
- *Block B Junction 5*
- *Block C Junction 5*
- *Block D Junction 7*
- *Pavilion Junction 7*

5.3 It is proposed to avoid Junction 6 as this junction has high pedestrian flows due to its proximity to the Rail station.

5.4 Demolition is expected to commence October 2023, and the duration of the construction period is estimated at 50 weeks. The substructure works will be undertaken in three phases commencing January 2024, March 2027 and July 2030. The superstructure works are expected to commence January 2024 and the fit-out August 2024 and will follow the substructure works.

5.5 Unless agreed in writing with the local planning authority, all 'noisy activities' for demolition and construction (such as piling) will be carried out within the following restricted hours:

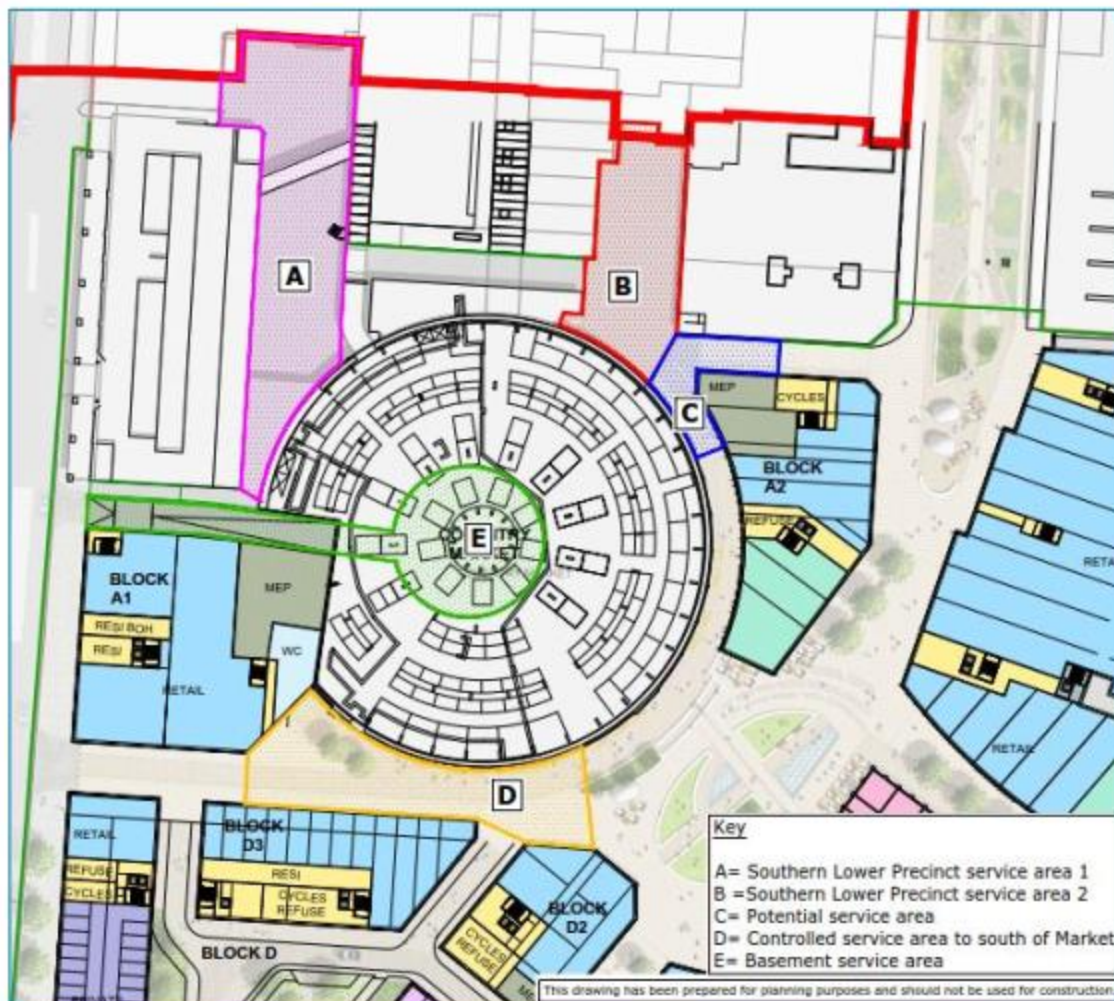
- *08:00 to 18:00 Mondays to Fridays; and*
- *08:00 to 14:00 during Saturdays; and*
- *At no other times, including Sundays or Public Holidays.*

5.6 The demolition period is estimated to have 70 staff, with 600 staff estimated for the construction period. Based on most staff arriving and departing during the typical weekday peak hours, the demolition and construction staff will have minimal impact on the local transport network as the existing site generates circa 900 person arrivals between 08:00 – 09:00 and circa 950 person departures between 17:00 – 18:00. On a Saturday, the existing site generates circa 1,000 person arrivals between 08:00 – 09:00 and circa 1,600 person departures between 14:00 – 15:00. Therefore the construction staff are likely to have minimal impact on the local transport network.

6. COVENTRY MARKET

- 6.1 There are a number of potential service areas associated with the Market. Those indicated below are based on the Delivery Servicing Management Plan submitted for the 2022 Permission.

Figure 6.1 – Market servicing areas



- **Zone A** is the western element of the Lower Precinct service yard, which is accessed from Queen Victoria Road and services both the retail units to the north and the Market to the south. Within this zone there are nine small service bays adjacent to the Market.
- **Zone B** is the eastern element of the Lower Precinct service yard, which is accessed via a bridge from Zone A. This area predominantly services both the retail units to the north.
- **Zone C** is a servicing area between the back of the existing retail units on Lower Market Way and the Market and is currently used to service both. It is accessed via a raising arm barrier from Area B. This area is shared with pedestrians.

- **Zone D** is broadly the area of the Rover Road service area adjacent to the Market. Under the Consented Scheme servicing from this area would be time restricted. Under the Refined Scheme this area would not be used for servicing.
- **Zone E** is the area under Block A1 used to provide a new ramp into the Market basement under the Consented Scheme. In the Refined Scheme the ground floor area under block A1 is enlarged to provide a new ground level service area for the Market.

Consented Scheme proposals

- 6.2 The Consented Scheme comprises 10 bays adjacent to the south of the Market (only usable 6am-10am) and four in the basement accessed via the new ramp – see below

Figure 6.2 – Southern Market servicing area

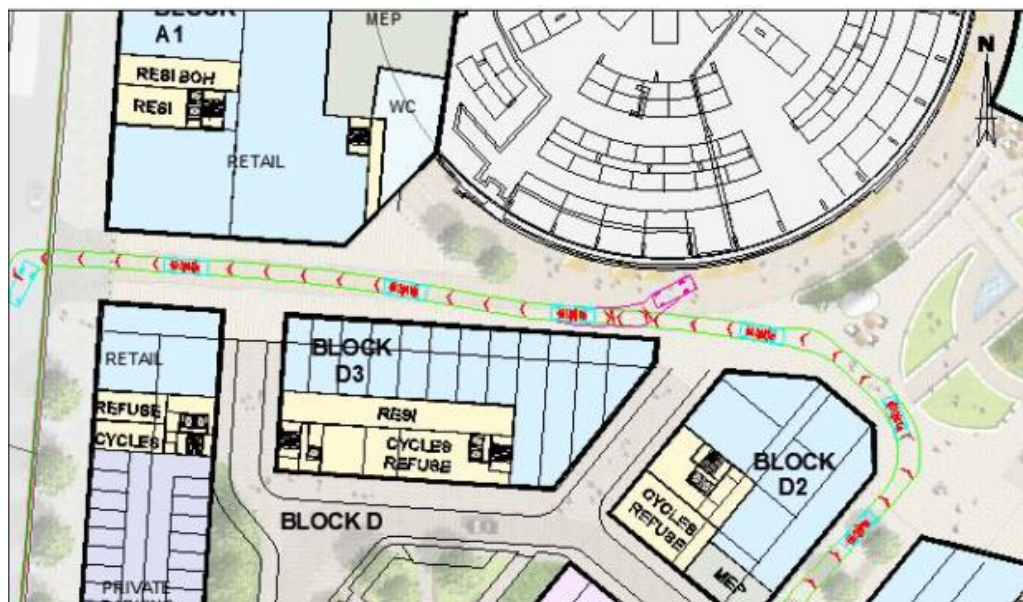
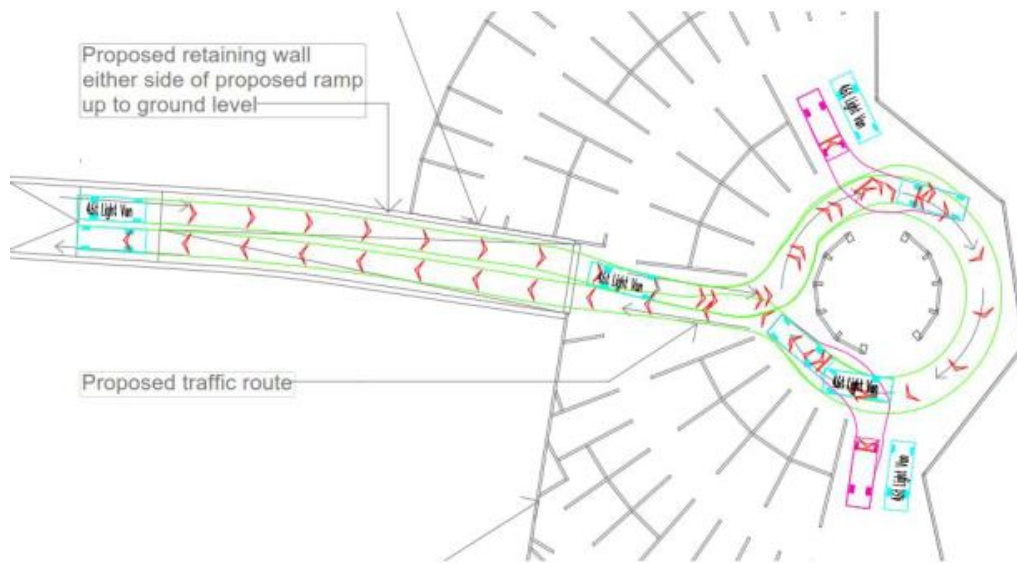


Figure 6.3 Market basement servicing area



- 6.3 This arrangement provides 14 bays during the AM peak and 4 van sized bays during the other periods. TPP's analysis of the Market servicing requirements demonstrated how this provision, used in conjunction with the nine bays in Area A was adequate to service the Market.

Royal London analysis

- 6.4 During discussions seeking to resolve their objection to the CPO, Royal London issued SPRL with a draft Servicing and Management Plan and a Technical Note prepared by their Transport Consultant, Mayer Brown, in relation to the servicing of the Market, on 22nd November 2022 (see **Appendix RV1**). The Technical Note raised a number of issues which Mayer Brown had and which the latest iteration of the refined design addresses.
- 6.5 Mayer Brown undertook a week long survey of the service yards which identified an average of 51 deliveries a day from the Rover Road servicing area, albeit with 119 vehicles utilising the service area on the Friday of that particular survey week. It should be noted that the survey figure for that particular Friday is more than twice the number of vehicles on any other day and compares to 63 daily service trips associated with this area during the earlier TPP survey.
- 6.6 Whilst the following reasonable worst case analysis is therefore based on the Mayer Brown worst case data from that particular Friday, it should be noted that this level of utilisation only occurred on one day during that particular week, with considerably fewer vehicles at all other surveyed times.

6.7 In their assessment, Mayer Brown raised some issues with the TPP analysis, including Market stall utilisation, vehicle dwell times, future unit subdivision, contractor parking and unoccupied units in the Lower Precinct Shopping Centre. In their analysis, Mayer Brown assumed:

- Market Stall utilisation being at 100% instead of the 78% during the survey.
- Vehicles staying more than 2 hours being curtailed at two hours rather than removed.

6.8 Table 3 of their technical note assesses the number of bays required to accommodate the Market operating at 100% with long staying vehicles curtailed to 2 hours. This includes the use of the 9 bays closest to the Market in Service Area A (which are the only ones the Market Traders will be allowed to use) also being used by the Lower Precinct Shopping Centre retailers.

Figure 6.3 – Mayer Brown Technical Note Table 3

Time (Fri 14 th)	Coventry Market Servicing Vehicle Accumulation Profile (100%)						Total available loading bays post- development
	No Time Restriction		2hr Time Restriction on All Vehicles		2hr Time Restriction on Service Yards C and D Only		
	At Hour	Max in Hour	At Hour	Max in Hour	At Hour	Max in Hour	
05:00	1	2	1	2	1	2	13
06:00	1	2	1	2	1	2	23
07:00	1	4	1	4	1	4	23
08:00	2	10	2	9	2	9	23
09:00	10	15	9	15	9	15	23
10:00	11	16	11	15	11	15	13
11:00	12	17	11	13	11	15	13
12:00	17	20	13	15	15	16	13
13:00	20	20	15	15	16	16	13
14:00	13	13	9	9	10	10	13
15:00	9	10	5	6	6	7	13
16:00	4	13	0	10	0	10	13
17:00	9	11	5	7	5	7	13
18:00	5	7	1	4	1	4	13
19:00	4	-	2	-	2	-	13

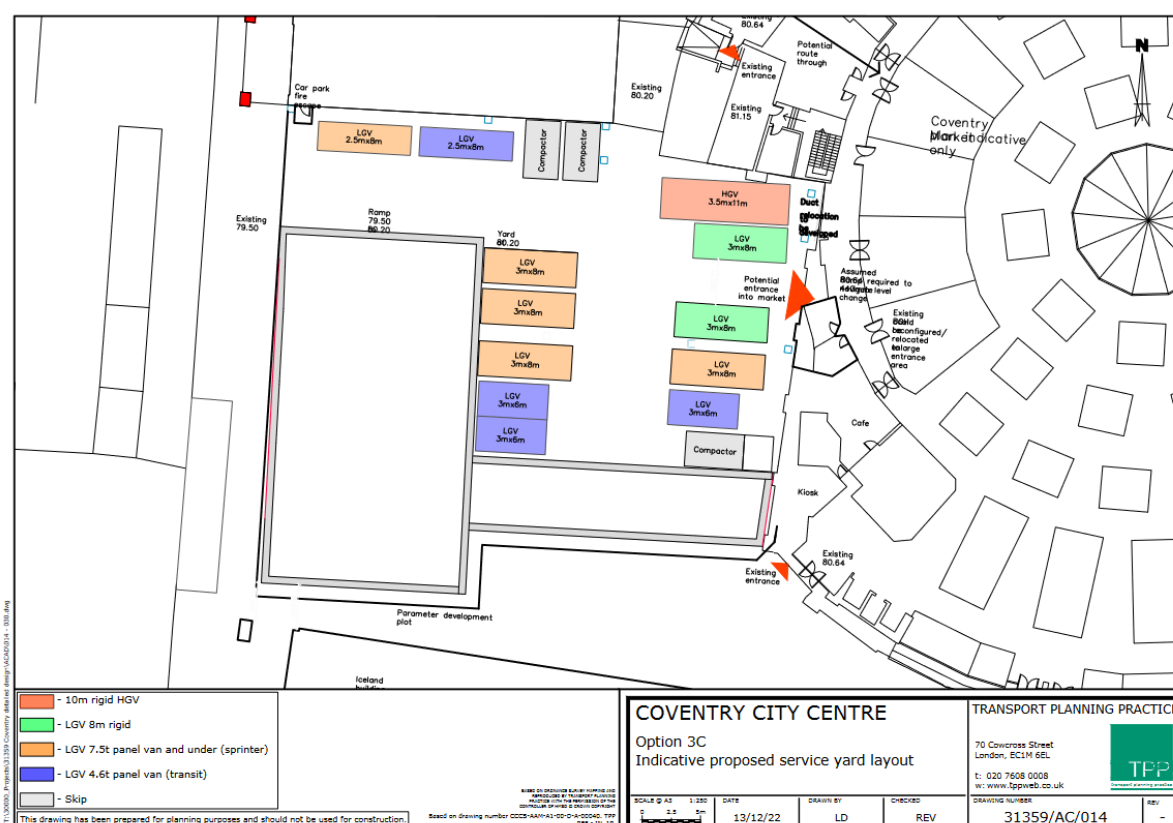
Table 3: Coventry Market Servicing Vehicle Accumulation Profile – Uplifted to 100% Occupation

6.9 Table 3 assesses three different scenarios:

- there being no restriction on duration of deliveries (the current position which is an unmanaged position);
- all vehicles being restricted to 2 hours for deliveries; and
- all vehicles in service area C and D being restricted to 2 hours for deliveries.

- 6.10 Based on the Mayer Brown assessment, in order for the Market servicing to be accommodated with no further time restrictions or management, 20 service bays would need to be provided to cover the peak period of between 12.00 and 14.00 during the Friday.
- 6.11 Notwithstanding that it is considered that the Mayer Brown assessment is worst case, in response to Royal London's objection SPRL have designed a revised Market servicing scheme that can accommodate 12 servicing vehicles adjacent to the Market. These 12 permanently accessible servicing bays (excluding the lay-by), in addition to the 9 bays already available in Service area A, results in 21 bays being available, ensuring that deliveries can be accommodated at all times even without a time restriction and caters for servicing arrangements above the Mayer Brown worst case assessment. This is illustrated in Figure 6.4 below:

Figure 6.4 – A1 Market servicing area



- 6.12 This revised Market servicing solution provides a new dedicated Market servicing area, accessible 24 hours a day, with a proposed new trolleying route directly into the Market. With this enhanced provision there will be no need to provide vehicular access via a ramp into the Basement, with the waste compactors being stored and collected from this new surface level service area.

- 6.13 The new dedicated Market servicing area can accommodate a 10m rigid lorry and two 8m lorries as well as a number of 7.5 ton vans (e.g. Mercedes Sprinter) and transit vans. As part of this provision, the servicing lay-by on Queen Victoria Road is also proposed to be extended to accommodate a 16.5m articulated vehicle, noting that goods will then be trollyed into the service area.
- 6.14 This provision excludes the three additional servicing bays in Area D (adjacent to Block A2), as Mayer Brown redistributed the Market trips onto the other Market service bays as they did not believe that these bays were suitable. Those three additional servicing bays in Area D are therefore only required to service Block A2.
- 6.15 Whilst this new dedicated Market service area could operate without any management, as is currently the case, some level of management regime may be considered to be appropriate, in particular with regard to long dwelling service vehicles. A management regime of the service area will thus be considered as part of the Servicing Management Plan submitted for the first reserved matters application.

7. STOPPING-UP OF HIGHWAYS

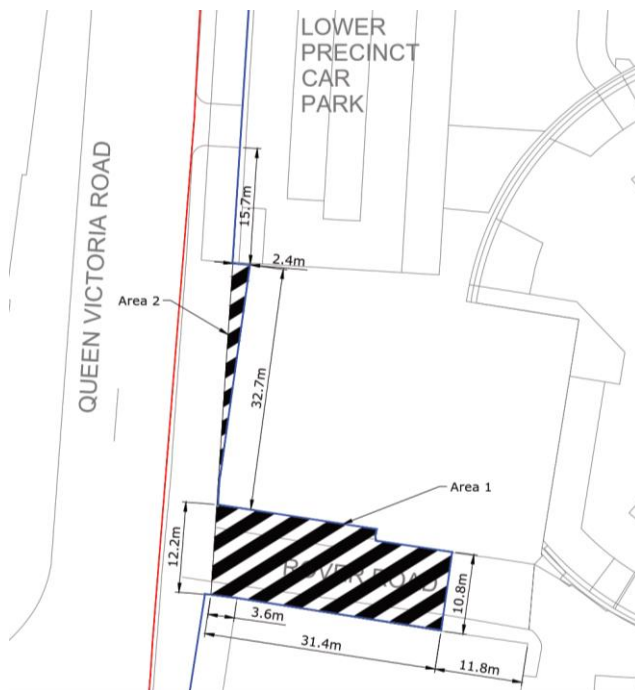
- 7.1 There are three applications for the stopping up of highway as detailed below. Each of the three applications has been made pursuant to section 247(2A) of the Town and Country Planning Act 1990 to enable development to be carried out by the Developer accordance with planning permission for the Scheme. The public consultation for all three stopping up orders commenced on the 24th November 2022, with notices pertaining to the Public Inquiry being published / advertised on 1st December 2022. The period for submission of objections expired on 22nd December 2022.
- 7.2 The stopping up orders have been prepared in relation to both the Consented Scheme and the Refined Scheme and are applicable to both schemes as the maximum building parameters have not changed in relation to the stopping up areas, or the need for the rationalisation of the existing highway boundary. Below I set out the existing and post construction function of each area of highway proposed to be stopped up before considering those objections received to each application.
- 7.3 All areas of highway proposed to be stopped are included within the CPO.

Application One: Rover Road (Draft Order Ref: WM5256) (DR4.2)

Area 1

- 7.4 The section of Rover Road that needs to be stopped up is identified as Area 1 below. Rover Road currently operates as an access (including for servicing) to the Market. It also includes an existing taxi rank.

- 7.5 The stopping up is required to allow for Block A1 of the proposed development to be built, and a rationalisation of the existing highway following the reconfiguration of the area. A new pedestrian (and, under the Consented Scheme only) servicing vehicle access for the existing Coventry Market and proposed development will be provided almost immediately to the south of the area to be stopped up. This results in only a minor route deviation for pedestrians and cyclists, and maintains emergency vehicle access. Alternative access and servicing arrangements for Coventry Market under the Revised Scheme are explained at section 8 of my proof above. The proposals for the relocation of the taxi rank from Rover Road to Warwick Road are explained at paragraphs 3.8 to 3.12 of my proof above.

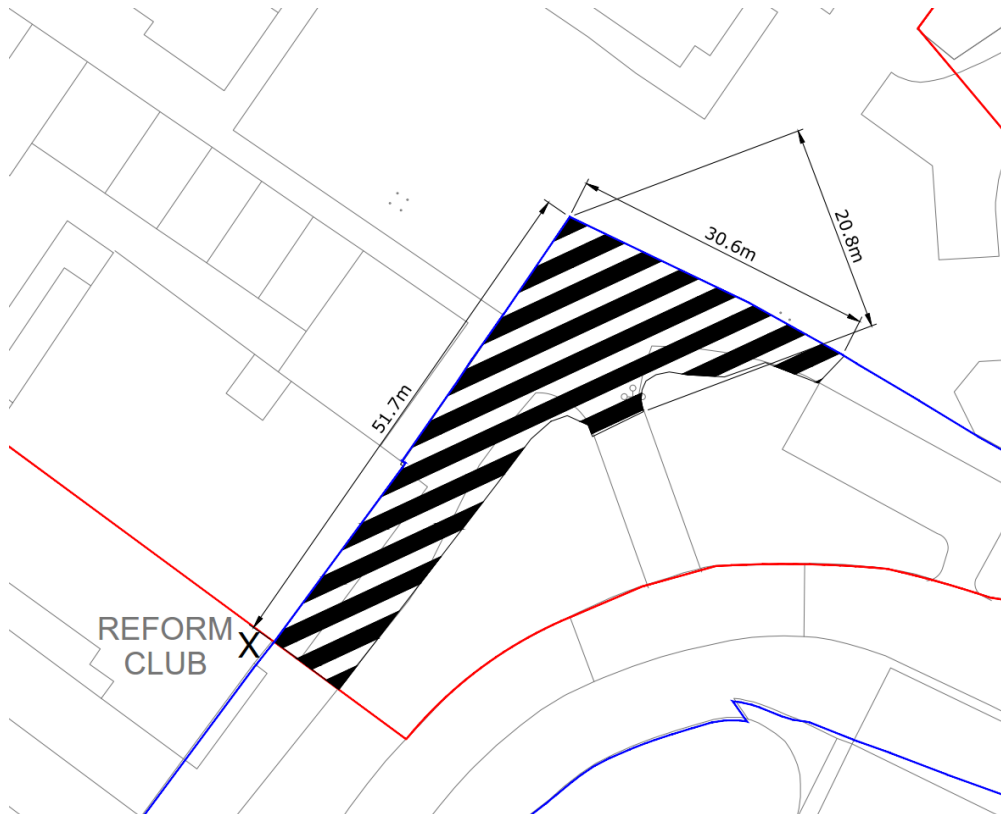


Area 2

- 7.6 The section of Queen Victoria Road that needs to be stopped up is identified as Area 2 above. This sliver of highway is currently paved and operates as part of the wider pavement area along the eastern side of Queen Victoria Road.
- 7.7 The stopping up is required to allow for Block A1 of the proposed development to be built. It also ensures the back of the highway aligns with the Lower Precinct Car Park to provide a continuously straight frontage.

Application Two: Warwick Row (Draft Order Ref: WM5257) (DR4.3)

- 7.8 The section of Warwick Row that needs to be stopped up is identified by the black and white hatch below. The area is currently paved and operates as part of the wider public realm adjacent to Bull Yard.
- 7.9 The stopping up is required to allow for Block C of the proposed development to be built. It is also allows for a rationalisation of the public realm.

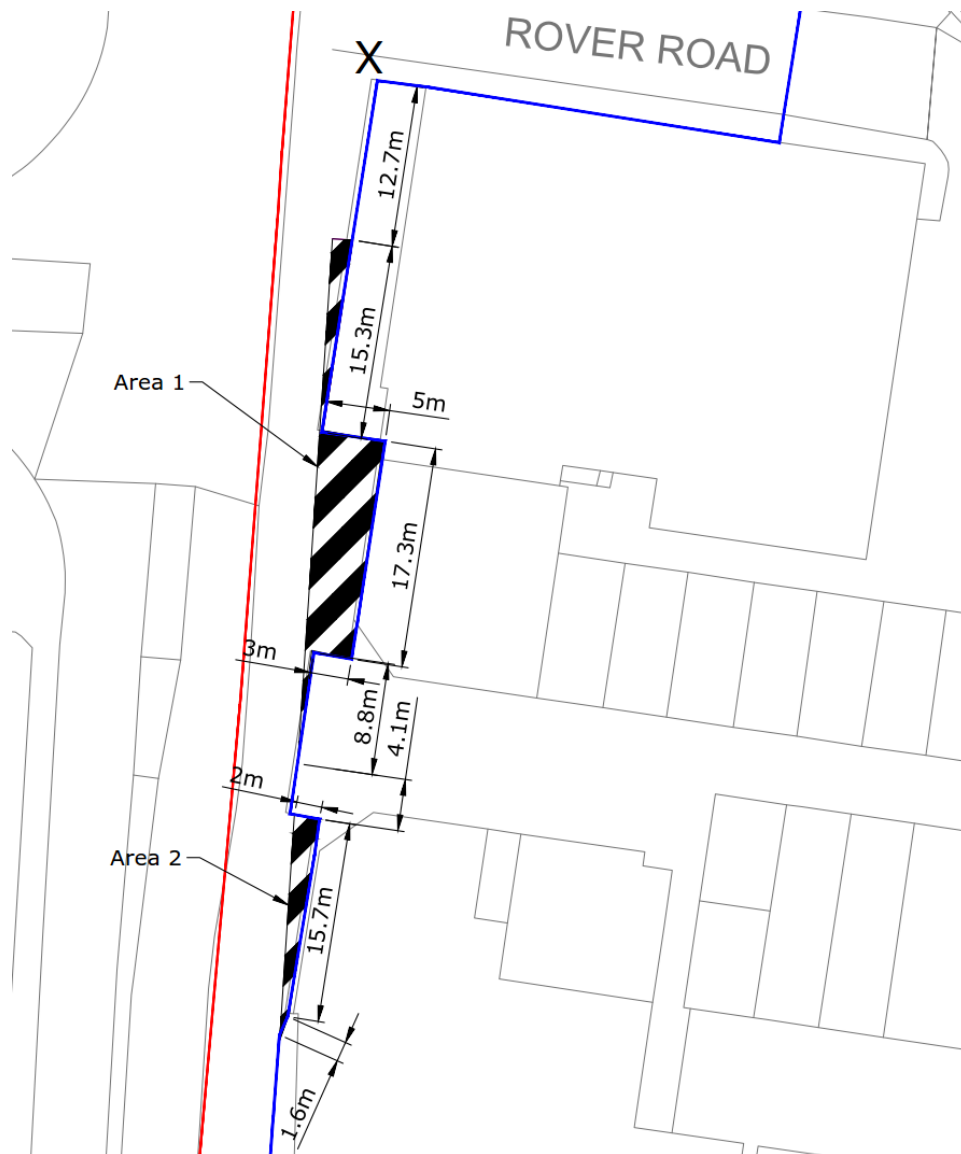


Application Three: Queen Victoria Road (Draft Order Ref: WM5258) (DR4.1)

Area 1

- 7.10 The section of Queen Victoria Road that needs to be stopped up identified as Area 1 is shown below. The area is currently paved and operates as part of a wider pavement area along the eastern side of Queen Victoria Road. The area also provides pedestrian access from the public highway to adjacent properties 38-40 City Arcade. These properties are included in the CPO and are due to be demolished as part of the Scheme.

- 7.11 The stopping up is required to allow for Block D of the proposed development to be built. Stopping up the highway land will allow for a continuous frontage to be provided along Queen Victoria Road.



Area 2

- 7.12 The section of Queen Victoria Road that needs to be stopped up is identified as Area 2 above. The area is currently paved and operates as part of a wider pavement area along the eastern side of Queen Victoria Road. The area also provides pedestrian access from the public highway to adjacent property known as 39-41 City Arcade. This property is included in the CPO and is due to be demolished as part of the Scheme.
- 7.13 The stopping up is required to allow for Block D of the proposed development to be built. Stopping up the highway land will allow for a continuous frontage to be provided along Queen Victoria Road. Dimensions as stated on the form are taken from the image above.

Objections To The Stopping Up Orders

- 7.14 Six parties submitted objections in response to the Stopping-up Orders.
- 7.15 Virgin Media has identified that it has electronic communications apparatus located within the highway to be stopped up at Rover Road, under which it has rights under s334 of the Highways Act 1980 (as amended). Virgin Media has objected pending completion of a Wayleave Agreement to protect this apparatus. The Developer is currently in discussion with Virgin Media with a view to completing this Wayleave Agreement, at which point the objection is expected to be withdrawn.
- 7.16 Cadent Gas Ltd has identified that it has gas apparatus within the highway to be stopped up, under which it has rights under Paragraph 4, Schedule 12, Part II of the Highways Act 1980. Cadent Gas Ltd has objected pending completion of a Deed of Easement to protect this apparatus. The Developer is currently in discussion with Cadent Gas with a view to completing this Deed of Easement, at which point the objection is expected to be withdrawn.
- 7.17 Mr Rafakat Hussain, t/a 8 Limbs Muay Thai Martial Arts Academy has objected on the basis that the Stopping-up Order of Rover Road will impact access to his property. I understand these premises are within the Order Land and it will not be necessary for the Council to implement the Stopping-up Order prior to possession of these premises for the development. I understand that representatives from the Council and the Developer are seeking to arrange a meeting with Mr Hussain to further explain the position to him.
- 7.18 Royal London Mutual Insurance Society Ltd has objected to the stopping-up of Rover Road, due to the impact to the Market and related issues. Royal London has also objected to the CPO (see proof of evidence of Mr Lawes (DR2.8)). As set out above, I am engaged in discussions on transport and servicing issues with Meyer Brown for Royal London with a view to seeking an agreed solution, but the arrangement which has been proposed in my view satisfactorily addresses the Royal London access and servicing concerns regarding the Stopping Up of Rover Road.
- 7.19 The Highways Development Control team at Coventry City Council issued a holding objection to the Stopping-up Orders for procedural reasons, but I understand this holding objection will be removed imminently.
- 7.20 Coventry Urban Regeneration Ltd (CURL) has objected to the stopping-up of Rover Road in relation to it impacting on their ability to access the site. CURL has also objected to the CPO and I am informed that agreement has been provisionally agreed (see proof of evidence of Mr Lawes (DR2.8)). Upon completion of this agreement it is expected that the objection to the Stopping-up Order for Rover Road will be withdrawn.

8. **CONCLUSION**

- 8.1 I give evidence on behalf of SPRL on the justification for the Council of the City of Coventry (City Centre South) Compulsory Purchase Order 2022 ("**CPO**"), and in support of the following applications for stopping up of highway pursuant to section 247 of the Town and Country Planning Act 1990 ("**TCPA**"):
- 8.2 The scheme is acceptable in highway terms, in particular in relation to pedestrian, cycle and vehicular access, and provides sufficient cycle and car parking, including disabled provision and electric charging facilities. The Site and the neighbouring Market can be adequately serviced, noting that these in principle arrangements can be further refined at the Reserved Matters stage.
- 8.3 The proposed mitigation for the net trip generation, by way of alterations to the required junctions, comprises acceptable mitigation as agreed with the Highway Authority. These designs will be refined further as part of the Reserved Matters Applications and will take into account other considerations including the Council's preferred junction types and its general approach to discouraging traffic in the City Centre.
- 8.4 During construction, based on most staff arriving and departing during the typical weekday peak hours, the demolition and construction staff will have minimal impact on the local transport network
- 8.5 SPRL have designed a revised Market servicing scheme that can accommodate 12 servicing vehicles adjacent to the Market. These 12 permanently accessible servicing bays (excluding the lay-by), in addition to the 9 bays already available in Service area A, results in 21 bays being available, ensuring that deliveries can be accommodated at all times even without a time restriction and caters for servicing arrangements above the Mayer Brown worst case assessment.
- 8.6 Three stopping up orders have been prepared in relation to both the Consented Scheme and the Refined Scheme and are applicable to both schemes as the maximum building parameters have not changed in relation to the stopping up areas, or the need for the rationalisation of the existing highway boundary.
- 8.1 Six parties submitted objections in response to the Stopping-up Orders. These are all being responded to in order to remove these objections.

9. STATEMENT OF TRUTH

- 9.1** I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

A handwritten signature in black ink, appearing to read 'Russell Vaughan', with a stylized, cursive script.

Russell Vaughan

29 December 2022

Document Reference 2.7

Town and Country Planning Act 1990

Acquisition of Land Act 1981

Local Government (Miscellaneous Provisions) Act 1976

Inquiry into:

**THE COUNCIL OF THE CITY OF COVENTRY (CITY CENTRE SOUTH) COMPULSORY
PURCHASE ORDER 2022**

and

Town and Country Planning Act 1990

Stopping-up of public highway

Proof of Evidence

of

Russell Vaughan

Director for Transport Planning Practice Ltd

On behalf of the Council of the City of Coventry

29 December 2022

**Appendix RV1 - Technical Note prepared by Mayer Brown in relation to the servicing of the
Market received 22nd November 2022**

DAC BEACHCROFT

Our Ref: ROY525-1488306
Your Ref:
22 November 2022

Graeme Lawes
Deloitte LLP
1 New Street Square
London EC4A 3HQ

Dear Graeme

The Council of the City of Coventry (City Centre South) Compulsory Purchase Order 2022 The Royal London Mutual Insurance Society Ltd ("Royal London")

Royal London has prepared its own draft Servicing and Management Plan accompanied by a Technical Note. These are attached to this letter as Schedule 1 and Schedule 2 and are provided without prejudice to any future submissions or comments on the legality or feasibility of putting the Servicing and Management Plan into practice. We have not identified whether there is the legal right to put this Plan into practice, nor have we tested its practicality with those who use the service yards.

Yours faithfully

DAC Beachcroft LLP

DAC Beachcroft LLP

CC Mark Beard at markbeard@spglondon.com

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ROYAL LONDON MUTUAL INSURANCE
SOCIETY LIMITED
COVENTRY MARKET & LOWER
PRECINCT SHOPPING CENTRE

DRAFT DELIVERY AND SERVICE
MANAGEMENT PLAN

NOVEMBER 2022



the journey is the reward

**ROYAL LONDON MUTUAL INSURANCE
SOCIETY LIMITED
COVENTRY MARKET & LOWER
PRECINCT SHOPPING CENTRE**

**DRAFT DELIVERY AND SERVICE
MANAGEMENT PLAN**

NOVEMBER 2022

Project Code:	RLAMCorporationStreet.1
Prepared by:	KC/GS
Approved by:	AP
Issue Date:	21st November 2022
Status:	FINAL

**Royal London Mutual Insurance Society Limited
Coventry Market & Lower Precinct Shopping Centre**

DRAFT Delivery and Service Management Plan

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1 Introduction

Context

- 1.1 This Delivery and Servicing Management Plan (DSMP) relates specifically to Coventry City Market and the Lower Precinct Shopping Centre service areas.
- 1.2 The servicing of these developments requires a high degree of management to ensure that they operate in a safe and efficient manner. Not only is this necessary to preserve safety within the servicing areas, but to also safeguard against any possible impacts on the public highway.
- 1.3 Prior to the City Centre South (CCS) development coming forward, the service areas which this DSMP covers were observed to accommodate nearly 600 daily vehicle trips under a partially managed service yard system. It will not be possible for this level of activity to be accommodated post CCS development under the current arrangement.
- 1.4 The yards covered by this DSMP would need to be managed by a single control room which is appropriately resourced, as set out later.

Report Purpose

- 1.5 This DSMP has been prepared for the benefit of site management staff, to provide a potential framework and guidance on the future operation of the site to inform the infrastructure to be implemented and maintained as part of the development proposals.
- 1.6 This report sets out potential delivery and servicing arrangements and measures with the aim of ensuring that deliveries could be undertaken efficiently and safely.
- 1.7 The remainder of this report is structured as follows:
 - Service Yard Layout and Restrictions
 - Access Control
 - Booking Arrangements
 - Waste Collection
 - Additional Measures and Initiatives
 - Enforcement
 - Office Duties, Resourcing, Monitoring and Review.

2 Service Yard Layout & Restrictions

Overview

- 2.1 This DRAFT Delivery and Service Management Plan (DSMP) relates only to the servicing of Coventry Market, the southern end of the Lower Precinct Shopping Centre and those units flanking Service Yard D illustrated below. Yard C is not covered by this DSMP. These areas are indicated in **Figure 2.1** below:

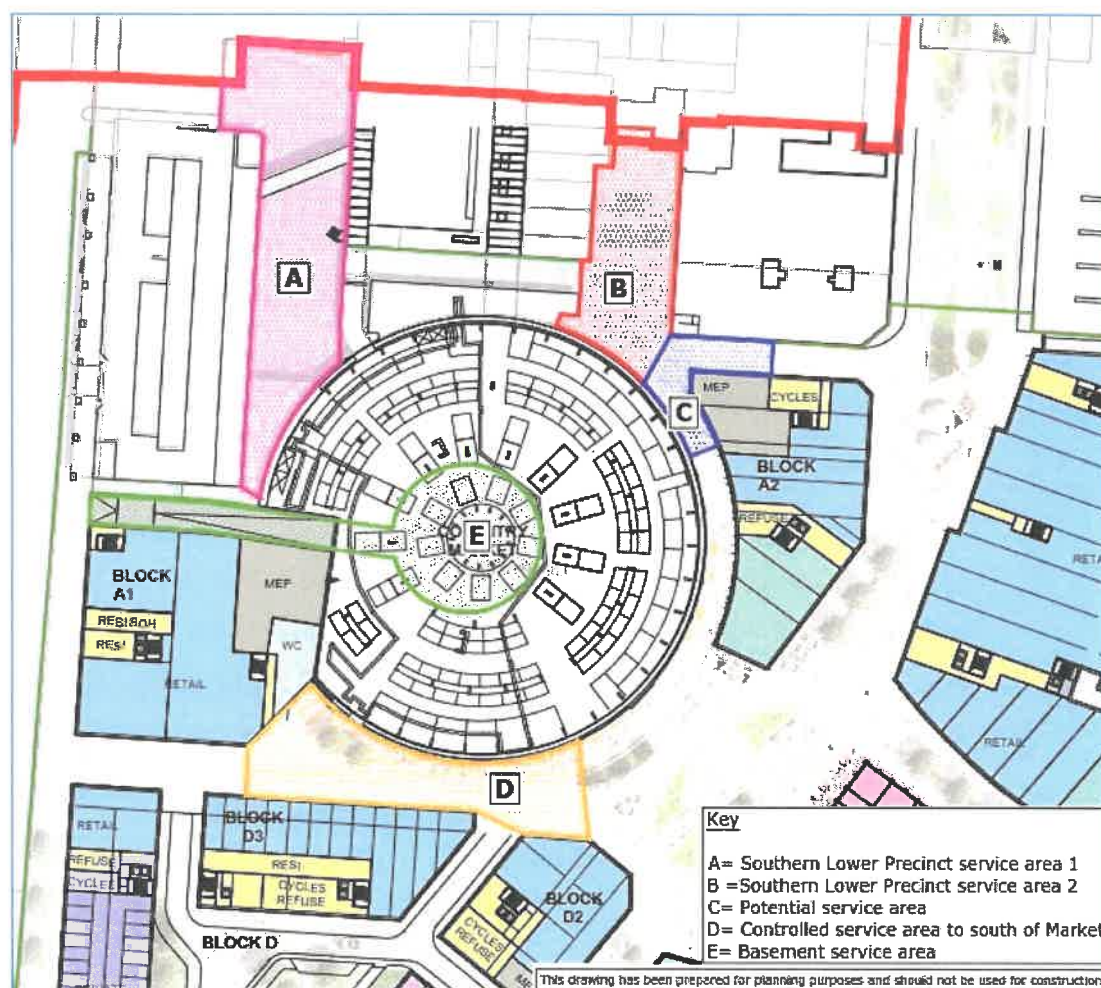


Figure 2.1: Service Yard Overview (Source: TPP DSMP)

Service Yard A

- 2.2 Service Yard A lies adjacent to Lower Precinct shopping centre and the north-western side of Coventry Market.
- 2.3 This area includes designated loading bays for Lower Precinct retailers and multi-purpose bays for Market traders & LPSC, delineated separately.
- 2.4 Access is achieved from Queen Victoria Road.
- 2.5 Access is permitted 24 hours a day.
- 2.6 There is restricted headroom in this area of 4.6m (15'11").
- 2.7 Vehicles longer than 13.6m are not permitted to access this yard. Smaller vehicles should be used if possible to ease manoeuvres.
- 2.8 It accommodates 14 loading bays numbered 1-14, as set out in **Figure 2.2** below.
- 2.9 All bays are subject to booking.
- 2.10 Market Traders can only have access to bays 6-14 subject to booking.
- 2.11 Lower Precinct retailers can have access to all bays, subject to booking.
- 2.12 No access is permitted for Market Way retailers or CCS Block A2.
- 2.13 Vehicles must park within a marked bay and keep fire escapes clear at all times.

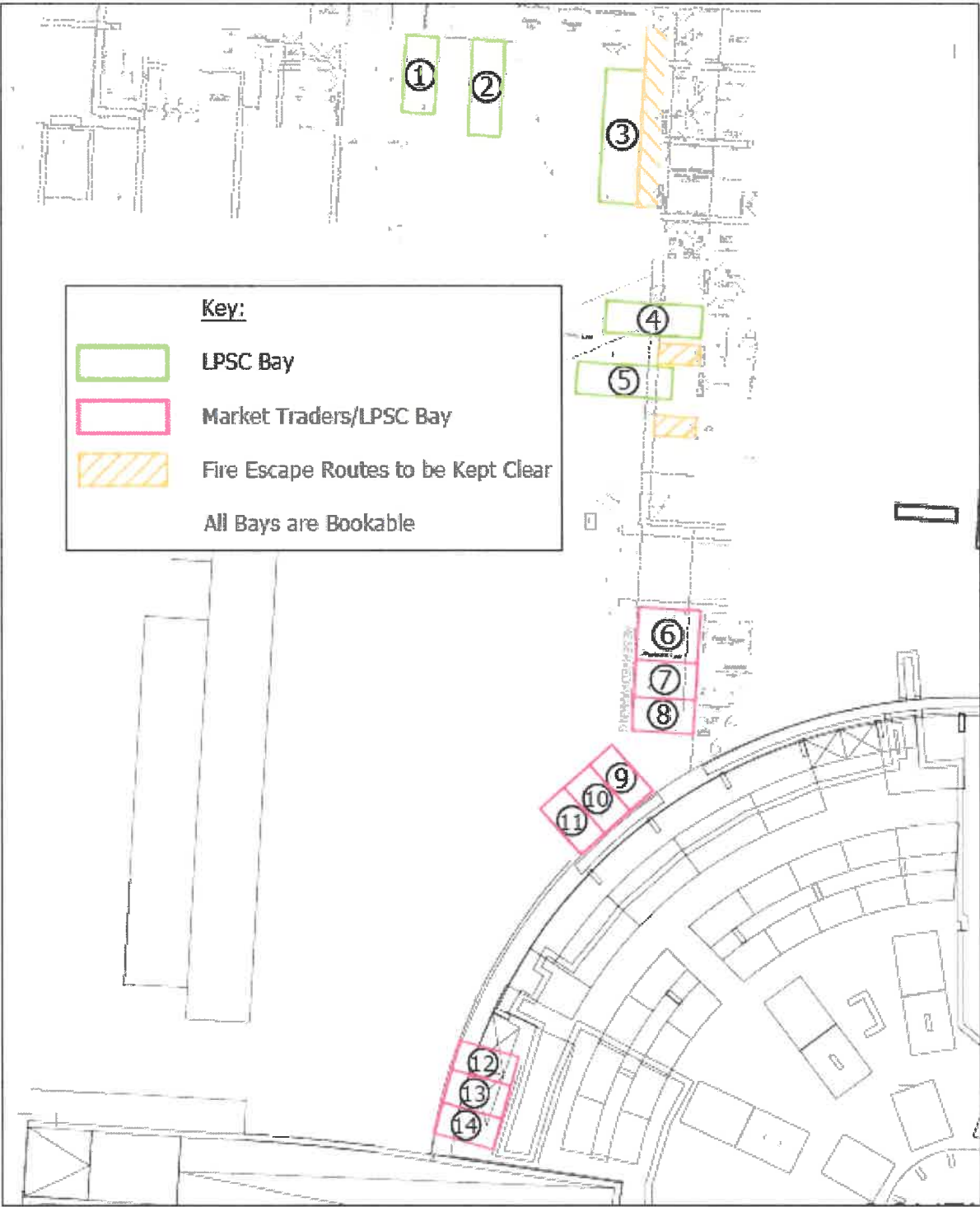


Figure 2.2: Service Yard A Loading Bay Arrangement

Service Yard B

- 2.14 Service Yard B lies adjacent to Lower Precinct shopping centre. This area serves only Lower Precinct retailers and is not to be used by others.
- 2.15 Access is achieved from Queen Victoria Road (via Service Yard A).
- 2.16 Access is permitted 24 hours a day.
- 2.17 Vehicles longer than 13.6m are not permitted to access this yard. Smaller vehicles should be used if possible to ease manoeuvres.
- 2.18 There is restricted headroom in this area of 4.6m (15'11").
- 2.19 It accommodates 3 loading bays numbered 1-3, as set out in **Figure 2.3** below.
- 2.20 All loading bays are for use by Lower Precinct shopping centre retailers only and subject to booking.
- 2.21 No access is permitted for Market Way retailers or CCS Block A2.
- 2.22 Vehicles must park within a marked bay.

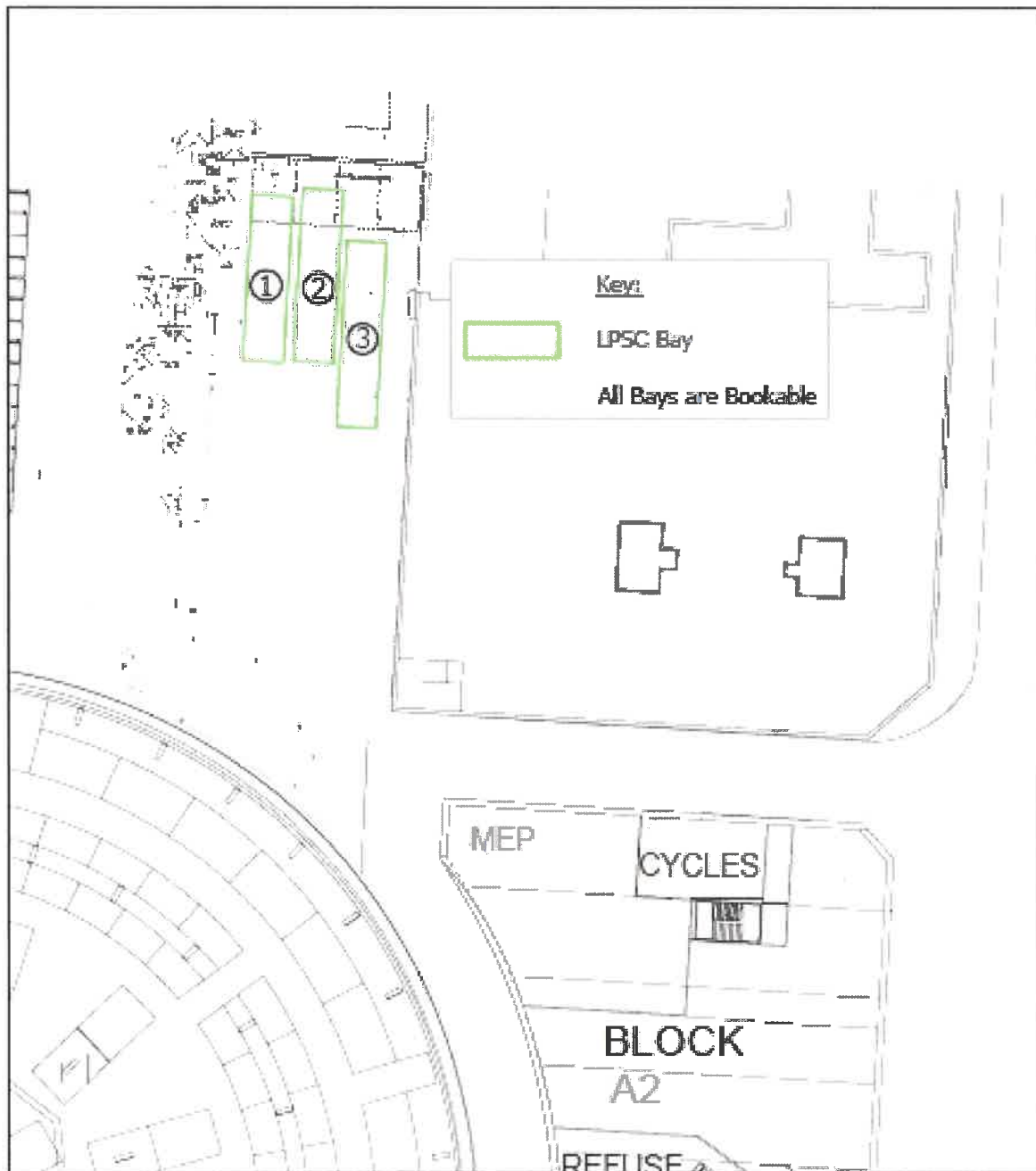


Figure 2.3: Service Yard B Loading Bay Arrangement

Service Yard D

- 2.23 Service Yard D lies adjacent to the southern side of Coventry Market.
- 2.24 This yard serves Market Traders and the flanking blocks.
- 2.25 Access is achieved from Greyfriars Road, with vehicles to exit onto Queen Victoria Road via Rover Way (renamed from Rover Road as part of the CCS development) – working as a one-way arrangement.
- 2.26 Access is only permitted between the hours of 0600 and 1000.
- 2.27 Vehicles longer than 10m are not permitted to access this yard. Smaller vehicles should be used if possible to ease manoeuvres.
- 2.28 It accommodates 10 loading bays numbered 1-10, as set out in **Figure 2.4** below.
- 2.29 All loading bays must be pre-booked.
- 2.30 Vehicles must park within a marked bay.

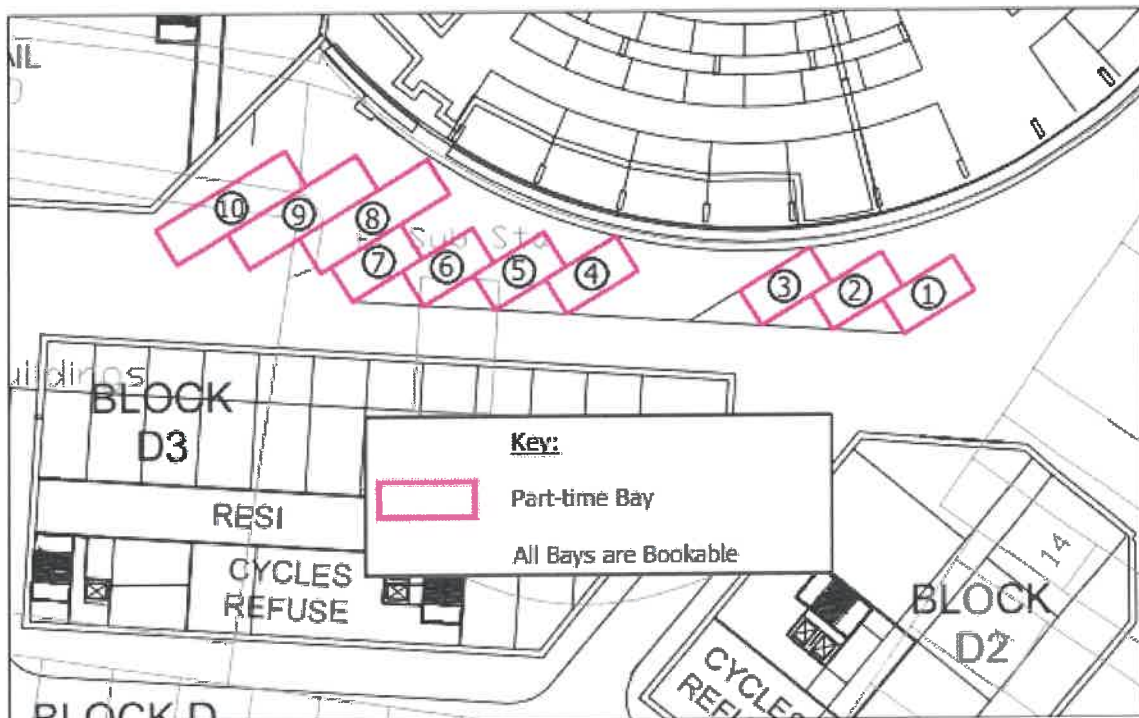


Figure 2.4: Service Yard D Loading Bay Arrangement

Service Yard E

- 2.31 Service Yard E lies beneath Coventry Market.
- 2.32 This yard serves Market Traders only.
- 2.33 Access is achieved from a dedicated ramp from Queen Victoria Road.
- 2.34 Access is permitted 24 hours a day.
- 2.35 Vehicles larger than a 4.6T panel van are not permitted to access this yard.
- 2.36 There is restricted headroom in this area of **XXm (TBC by Acquiring Authority)**.
- 2.37 It accommodates 4 loading bays numbered 1-4, as set out in **Figure 2.5** below.
- 2.38 All loading bays must be pre-booked.
- 2.39 Vehicles must park within a marked bay.

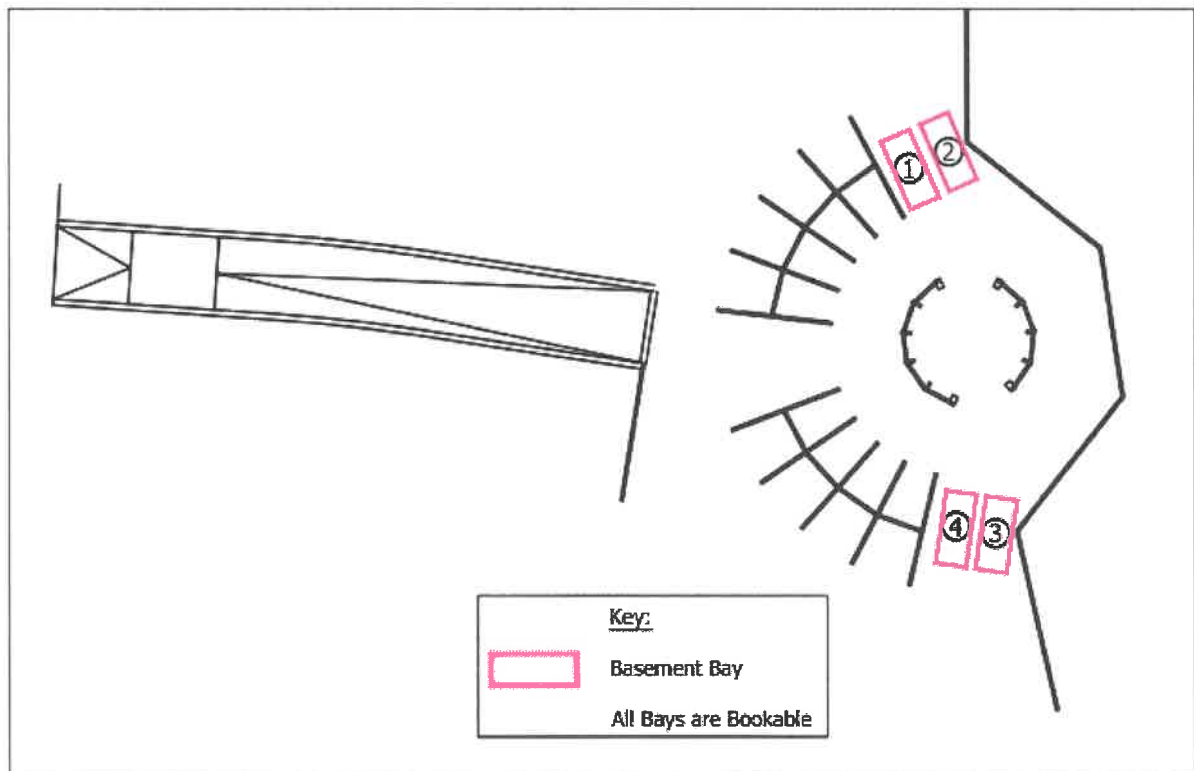


Figure 2.5: Service Yard E Loading Bay Arrangement

Service Yard Summary

Service Yard	Number of Loading Bays						
	Car Bay	LGV Bay (circa 6m length)	8m Rigid HGV Bay	10m Rigid HGV Bay	12m Rigid HGV Bay	12.6m Artic Bay	13.6m Artic Bay
A	1	9	3	1			
B					1	1	1
D		7		3			
E		4					
Total	1	20	3	4	1	1	1

Table 2.1: Loading Bay Summary (See Appendix A)

Service Yard	Loading Bay Restriction			
	Max. vehicle Length	Max. vehicle Height	Use by	Access Times
A	10m	4.6m	Lower Precinct and Market Traders	00:00 – 00:00
B	13.6m	4.6m	Lower Precinct	00:00 – 00:00
D	10m	N/A	Market Traders and flanking blocks	06:00 – 10:00
E	6m	TBC	Market Traders	00:00 – 00:00

Table 2.2: Service Yard Restrictions (*Smaller vehicles should be used if possible to ease manoeuvres*)

3 Access Control

Service Yards A & B

- 3.1 Access and egress to Yard A must be physically restricted by way of a barrier. This will also control access to Yard B.
- 3.2 The barrier will utilise ANPR to provide automatic entry for pre-booked vehicles only.
- 3.3 At the barrier, an intercom must be provided and maintained on the drivers side, connected to the control room to allow for a manual over-ride of the barrier by the service yard manager.
- 3.4 If a vehicle arrives and is not pre-booked, the service yard manager should permit access, for the purpose of turning and leaving immediately only. **Figure 3.1** below identifies the area to be kept clear to permit this “rejection” manoeuvre.

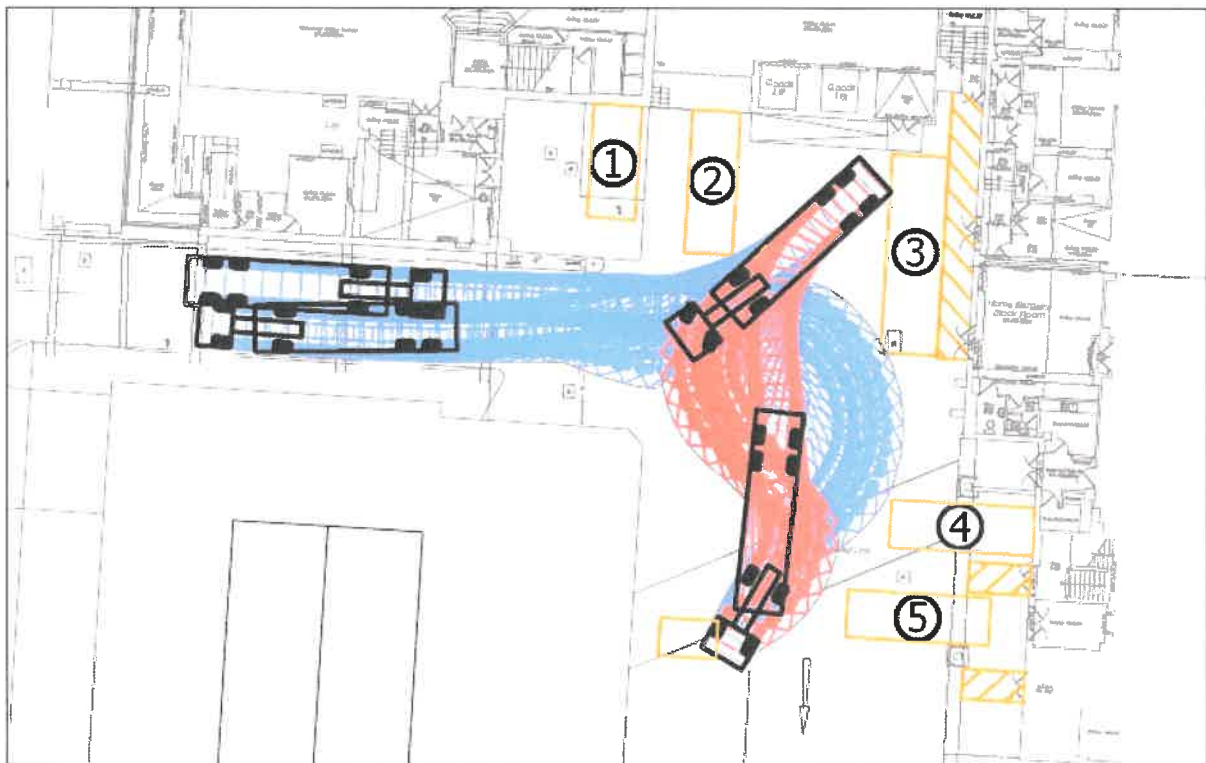


Figure 3.1: Vehicle Rejection Routing (Service Yard A&B)

Service Yard D

- 3.5 Access and egress to Yard D must be physically restricted by way of a barrier (or bollards). Rover Way access is only permitted 0600-1000 hours.
- 3.6 The barrier will utilise ANPR to provide automatic entry for pre-booked vehicles only.
- 3.7 At the barrier, an intercom must be provided and maintained on the drivers side, connected to the control room to allow for a manual over-ride of the barrier by the service yard manager, if needed.

Service Yard E

- 3.8 Access and egress to Yard E must be physically restricted by way of a barrier (or bollards).
- 3.9 The barrier will utilise ANPR to provide automatic entry for pre-booked vehicles only.
- 3.10 At the barrier, an intercom must be provided and maintained on the drivers side, connected to the control room to allow for a manual over-ride of the barrier by the service yard manager, if needed.
- 3.11 If a vehicle arrives early or without pre-booking the service yard manager should permit access, for the purpose of turning and leaving immediately only. **Figure 3.2** below identifies the area to be kept clear to permit this manoeuvre.

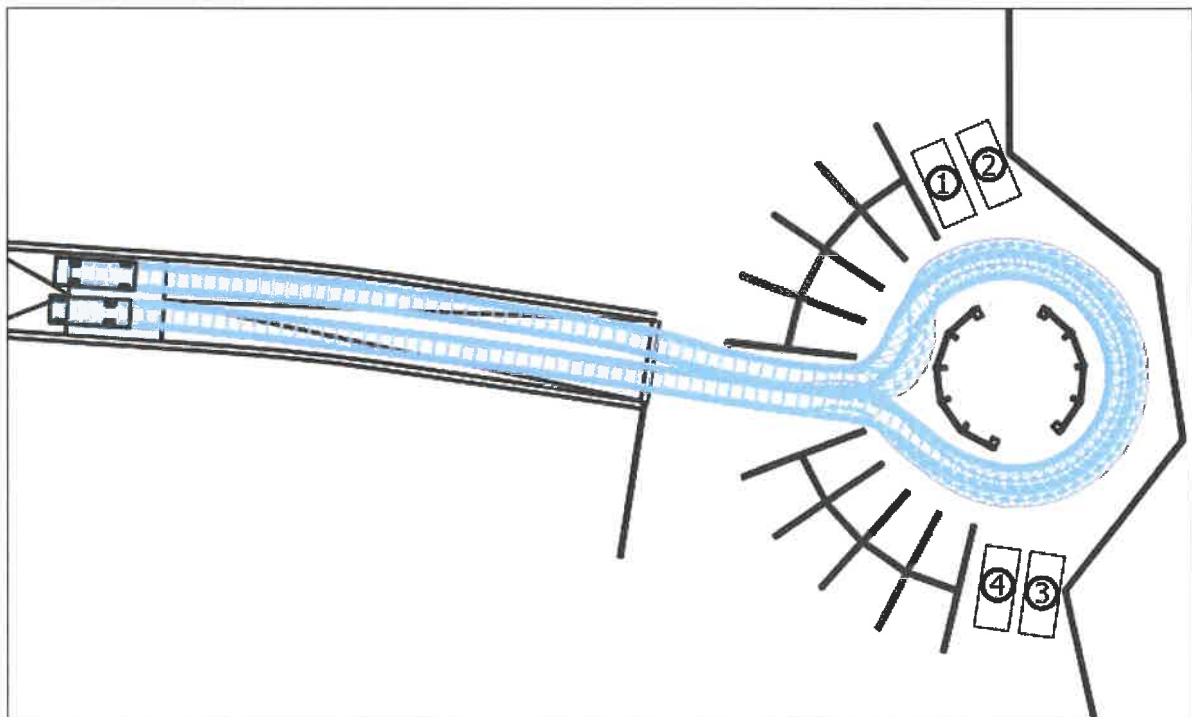


Figure 3.2 Vehicle Rejection Routing (Service Yard E)

4 Booking Arrangements

Application

- 4.1 Booking will be required for all bays:
- 4.2 Bookings will not apply to waste collection.

Booking Arrangements

- 4.3 Bookings must be made on-line in advance of any servicing activity taking place via the service yard portal.
- 4.4 Booking blocks will be 30 minutes long. In some cases it will be possible to book multiple half-hour blocks in order to conduct the required activity, but typically deliveries and the majority of trips into the Service Yards are expected to be able to be accommodated within this half-hour window.
- 4.5 Every bookable loading bay across the Service Yards will have a unique number/reference code with the maximum sized vehicle that can be accommodated in each loading bay. A plan indicating the location of each of the bays will be provided on the booking system, in the control room, at the entry barriers, and within each Service Yard.
- 4.6 Each booking made on the system must include:
- The half-hour slot(s) that have been booked
 - The delivery bay that has been booked
 - The number plate of the vehicle to be used
 - The size of the vehicle to be used
 - The name of the driver of vehicle (if known)
 - A phone number for the driver (or person booking)
 - The name of the company associated with the driver
 - A phone number for the company associated with the driver (if known)
 - The contact details for the person making the booking (i.e. retailer etc)

5 Waste Collection

- 5.1 Waste and compacted material collection is comparatively infrequent and should be permitted access on-demand.
- 5.2 Waste collection vehicles will be permitted access to all Service Yards.

6 Additional Measures and Initiatives

Clear Signing and Lining

- 6.1 Signs providing clear instructions will be maintained within the service yard.
- 6.2 All Loading Bays are to be clearly marked and maintained.

Information Packs

- 6.3 Information packs will be issued to market traders, and to retailers in Lower Precinct who use the Service Yards. These information packs include:
 - A summarised version of the information in this DSMP,
 - A site plan with all bays labelled and indicated,
 - Details of the Booking system
 - Specified hours of operation for each Service Yard,
 - Details of which bays and areas are accessible by which size of vehicle,
 - Contact number for the site management office,
 - A flow diagram explaining which Service Yard to use to and which entrance to use depending on where you are servicing,
 - Promotional material on the benefits of low emission vehicles and electric vehicles for deliveries,
 - A list of the possible infractions (e.g. overstaying agreed duration of stay, obstructing access) and their associated penalties; and
 - Enforcement procedures.
- 6.4 The production and distribution of these Information Packs is the responsibility of the site operators, not the on-site Service Yard staff.

Other Measures

- 6.5 Basement storage units (the areas around Service Yard E) will be rationalised to enable a greater level of storage on-site, with an aim to reduce the need for deliveries.
- 6.6 Regular (at a minimum, monthly) working meetings will be held between the management teams of Coventry Market and of the Lower Precinct in order to resolve issues relating to the impact of servicing.
- 6.7 Management of the site will engage with regular freight and servicing operators that travel to the site, especially including refuse collectors, to ensure that their journeys are accommodated. Site staff will be proactive as well as reactive in terms of communicating with delivery and servicing firms.

- 6.8 Management Teams will be encouraged to contract suppliers registered with a best practice scheme, such as the Freight Operator Recognition Scheme (FORS). Full details of the benefits associated with FORS can be found at www.fors-online.org.uk.
- 6.9 Site management will engage with market traders to identify if any deliveries from suppliers could be consolidated to reduce the number of vehicles arriving onto the site.
- 6.10 Suppliers of goods to the site will be encouraged to use low emission or electric vehicles to deliver to the site.

7 Enforcement

- 7.1 CCTV will supplement the access system, with a live feed to the control room in order that the management team can identify any operational issues.
- 7.2 A dedicated enforcement officer will be present for the opening hours of the yard to assist in the management of the yards.
- 7.3 On site enforcement of the rules and regulations of this DSMP is undertaken by:
- INSERT Contractor details**
- 7.4 The contractor has the right to issue an enforcement notice (financial penalty) for the following:
- Exceeding agreed dwell time;
 - Loading/unloading or stopping outside of a marked Loading Bay
 - Loading/unloading within an incorrect Loading Bay
- 7.5 The right of appeal of an enforcement notice should be directed to the contractor.

8 Office Duties, Resourcing, Monitoring and Review

Office Duties

- 8.1 The Service Yard Management office are responsible for a number of duties relating to the safe operation of the Market and Lower Precinct and their associated servicing areas.
- 8.2 These duties are considered to be (but not limited to):
- Fire testing from 7am – 10am 3 days a week.
 - Responding to any calls via the intercom from the pay machines
 - Intercom for the service yard barriers
 - Pre-booking any contractor bay
 - Monitoring cameras and responding to any city centre issues
 - Responding to any intruder alarms
 - Issuing equipment for each cleaner
 - Key signing in and out
 - Logging issues in DOB (Daily Occurrence Book)
 - Accepting any telephone calls and dealing with enquiries
 - Responding to the doorbell for any signing in of mall promotions
 - Contractor signing in and out and inductions
 - Dealing with any lift alarms
 - Dealing with any fire activations

Resourcing

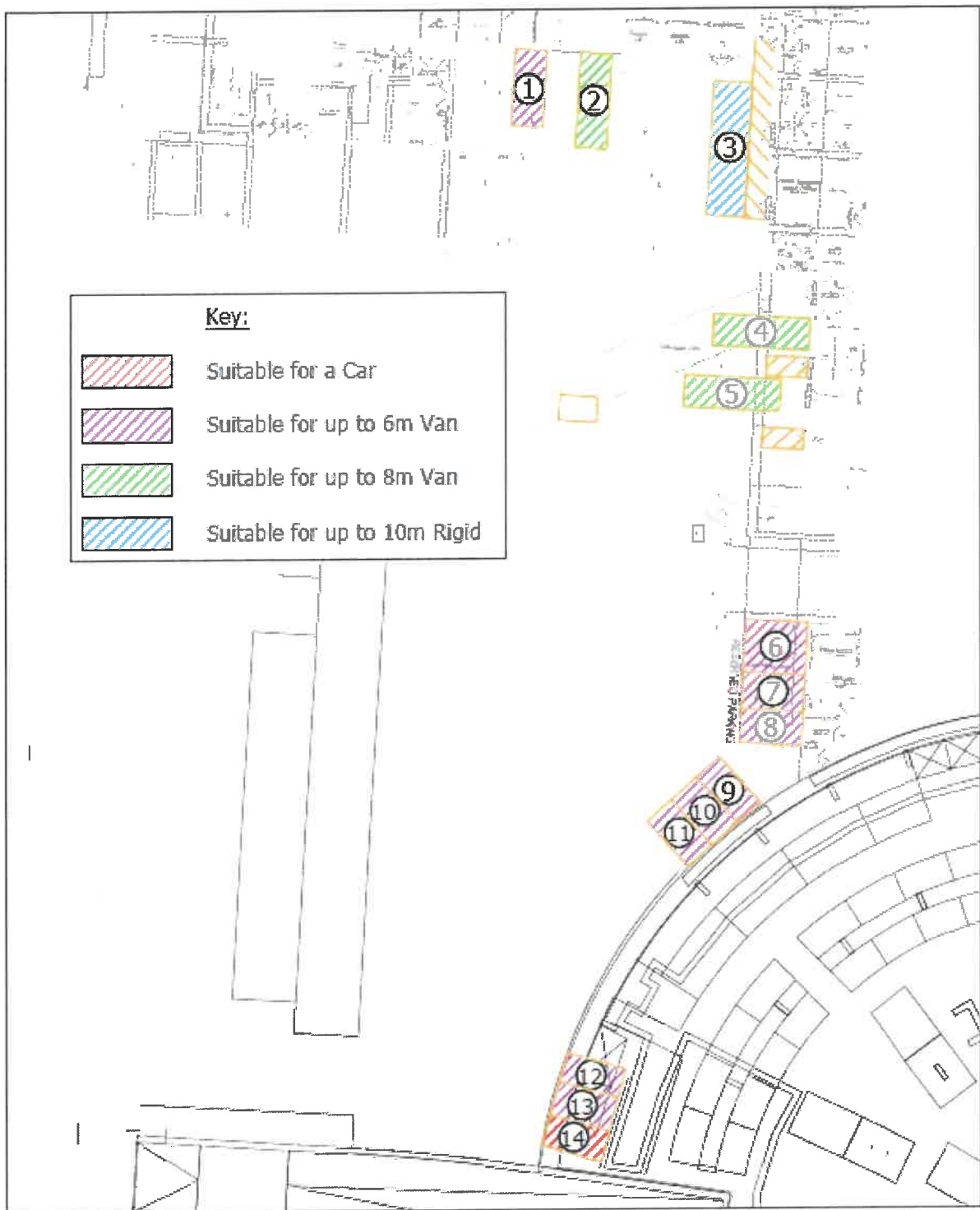
- 8.3 Given the duties that are required to be fulfilled, a minimum of three service yard staff shall be available at any one time (including the enforcement officer). One should remain in the control room at all times.
- 8.4 This may comprise solely management team staff, or a mix of management team staff and contractors.

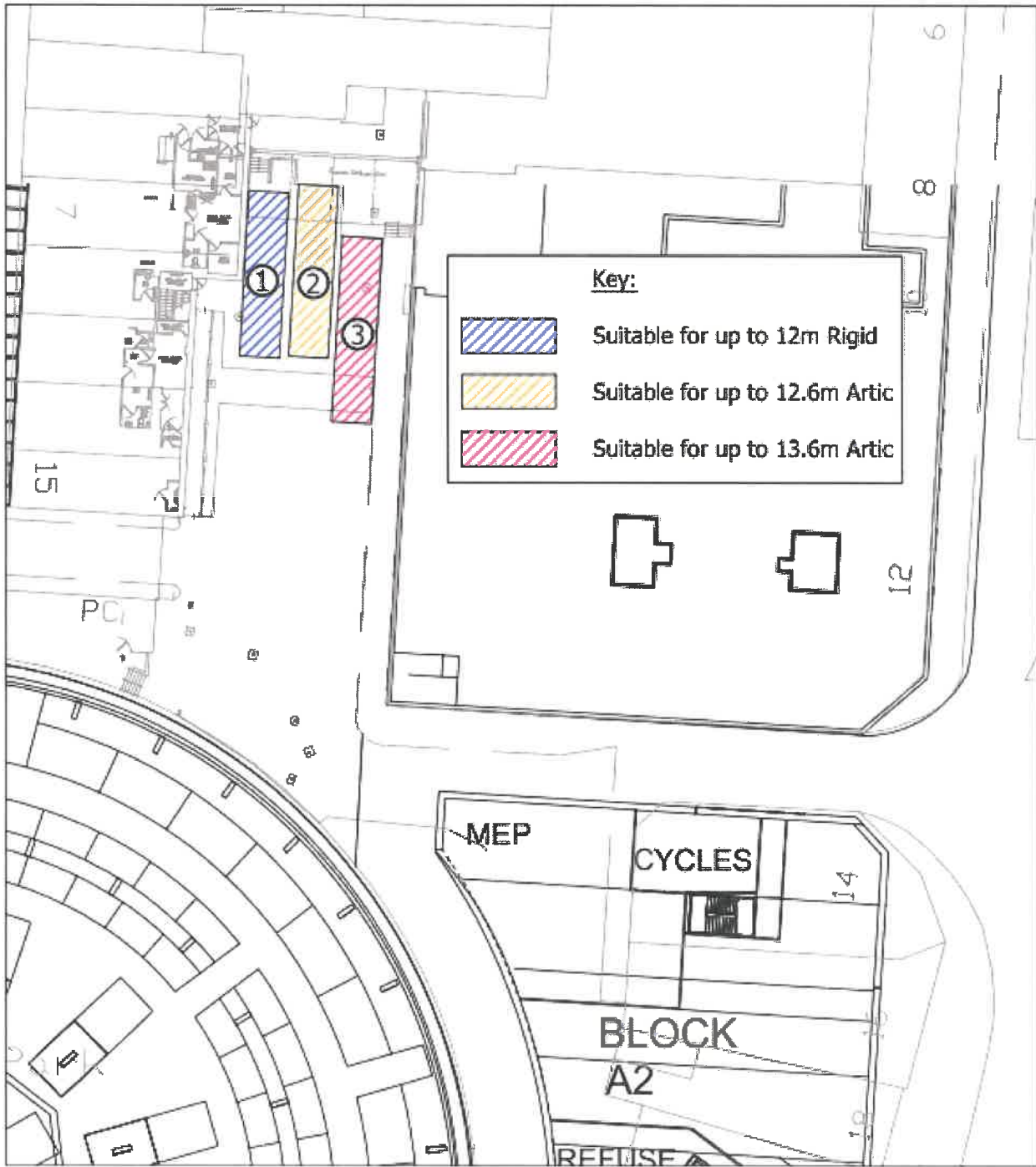
Monitoring and Review

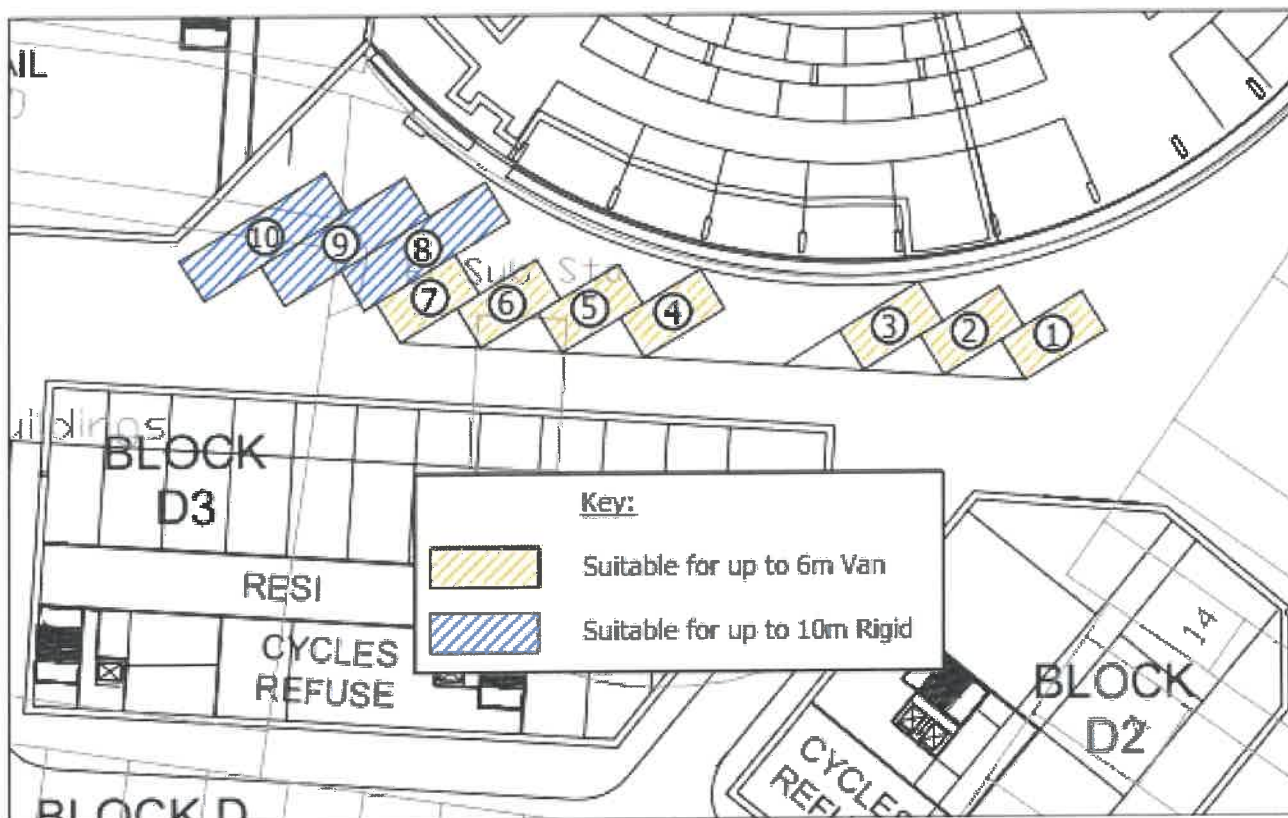
- 8.5 The Management Team (or appointed consultant) will undertake delivery monitoring surveys for all associated service areas annually to ensure the measures contained in this DSMP remain appropriate.

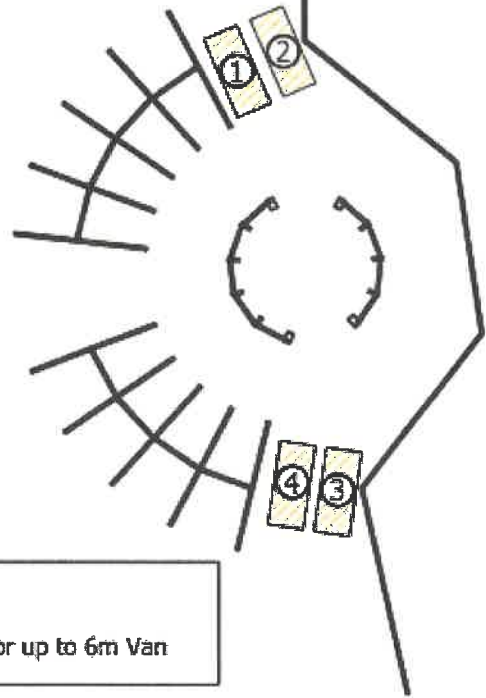
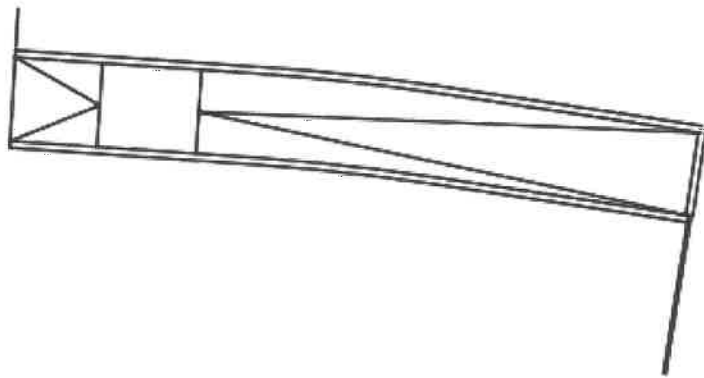
- 8.6 The review should be undertaken in consultation with all affected parties, including Market Traders (or representative), CCS Operator, Enforcement Contractor and Royal London Mutual Insurance Society Limited.
- 8.7 Any review should include (but not be limited to):
- Whether the booking arrangements need to cover less/more bays;
 - A detailed consideration of any recorded accidents within the service yards and any required mitigation;
 - Whether bookings need to be limited or extended in duration;
 - Consideration of “buffer” times between bookings to allow for some flexibility; and
 - Consideration of whether the enforcement requires adapting.

APPENDIX A: Loading Bay Maximum Vehicle Size Plans

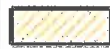








Key:



Suitable for up to 6m Van

Technical Note

Data Analysis

General Approach/Temporal Scope

1.1 TPP analysis was based on a survey of one single weekday (Thur 21/11/2019) and one single weekend (Sat 23/11/2019).

- **Concern:** that the TPP single day survey choice fails to capture a busiest weekday and underestimates servicing demand.
- **Findings:** Mayer Brown (MB) Survey (week-long 10/10-16/10 2022) – summary below (servicing trips only – no taxi/drop off etc):

Date (October 2022)	Service Yard D (Rover Road)	Service Yards A, B and C (Lower Precinct)	All Service Yards
Mon 10 th	48 vehicles	123 vehicles	169 vehicles
Tues 11 th	57 vehicles	151 vehicles	208 vehicles
Weds 12 th	39 vehicles	146 vehicles	185 vehicles
Thurs 13 th	29 vehicles	123 vehicles	152 vehicles
Fri 14 th	119 vehicles*	145 vehicles	264 vehicles
Sat 15 th	36 vehicles	87 vehicles	123 vehicles
Sun 16 th	29 vehicles	39 vehicles	68 Vehicles

Table 1: Vehicle Activity Across Survey Period 10/10/22-16/10/22 (excluding drop off and taxi movements) *TPP identified 63 daily servicing trips in this area.

- 1.2 The MB surveys identify that the Thursday is the quietest weekday in terms of servicing activity across all the yards.
- 1.3 Friday is the busiest weekday and significantly more so than Thursday. The TPP data therefore under-plays the existing demand and likely displacement of servicing activity.
- 1.4 A plan of the proposed Service Yards and their labels is provided for ease of reference in **Figure 1** below:

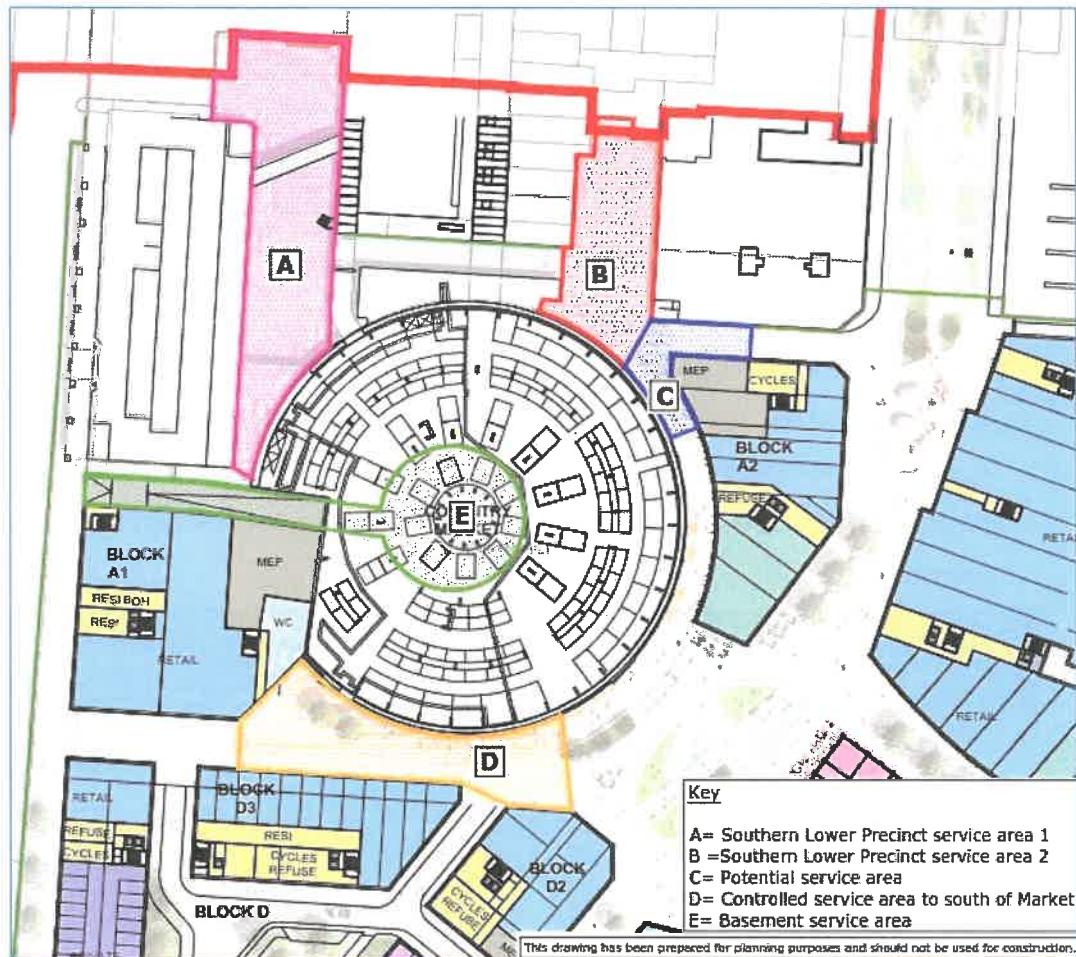


Figure 1: Proposed Site Layout (Source: TPP DSMP)

Other data issues with LPSC and Market Traders

- 1.5 The primary concerns revolve around the following principles:
- 1.6 **Geographical Scope (in general):** TPP analysis presents data for the southern side of Coventry Market and assumes this can be displaced in the afternoon to the basement (Service Yard E) and Lower Precinct Shopping Centre (LPSC) service area (Service Yards A and B). *No data has been presented on the ability of LPSC service area to cater for displaced vehicles.*
- 1.7 **Geographical Scope (specific to Market Activity):** When displaced into the LPSC, it is likely that Market Traders Activity will be drawn towards those bays closest to the Market. *Does this result in an over demand for use in this area?*

- 1.8 **Market Occupation:** The MB surveys were undertaken when the Market stalls were 78% let. The TPP analysis made no reference to the market occupation. *Consequently, The TPP analysis may well underestimate potential Market Trader servicing demand that will be displaced.*
- 1.9 **Duration of Stay Adjustments:** In their analysis, TPP remove any vehicle staying more than 2 hours from their calculations. By removing these vehicles, demand is consequently reduced. These vehicles may be undertaking a genuine servicing activity which (subject to being prompted) could be undertaken in less than 2 hours. It would be more robust to assume that any vehicle staying in excess of 2 hours is curtailed, rather than removed. *Consequently, The TPP analysis may well underestimate potential Market Trader servicing demand that will be displaced.*
- 1.10 **Unit subdivision:** We are advised that the Next unit within the LPSC is to be subdivided which is likely to affect servicing activity adjacent to that unit. Servicing activity is typically estimated on a floor area basis so it is generally accepted that servicing demands (or any trips) are unlikely to significantly change as a result of subdivision. Notwithstanding that general practice, it would not be unreasonable to assume any recorded accumulations may increase at some point during the day as a result of multiple occupiers within a subdivided unit. *Any calculations relating to servicing demand should therefore be considered with this in mind.*
- 1.11 **Contractor Parking** During the week of the MB survey, only one long stay vehicle was recorded within the 9 bays closest to the market in LPSC, likely to be a contractor vehicle. We understand that contractors can regularly require a number of bays for extended periods and, indeed during a site visit on the 8th November 2022 two contractor vehicles were observed to be using spaces for an extended period and two further spaces were occupied by a cherry picker and raising platform (used for Christmas decoration installation) which would be on site for several days. We understand that these types of activity are a regular occurrence. *This would reduce the available capacity and any calculations relating to servicing demand should therefore be considered with this in mind.*
- 1.12 **LPSC Occupation:** The MB surveys were undertaken when some units within the LPSC were unoccupied. Data is presently being collated on this to enable a suitable adjustment to calculations to be made, so the figures presented below should be read in that context.

- 1.13 The table below adjusts recorded accumulation to reflect the reduced Market Traders occupancy (but not LPSC) and also retain any vehicle servicing for greater than 2 hours (but curtails their visit to a maximum of 2 hours) and presents data for all LPSC yards.

Time (Fri 14 th)	Accumulation Across All Service Yards (Market at 100%)						Total available loading bays post- development
	No Time Restriction		2hr Time Restriction on All Vehicles		2hr Time Restriction on Service Yards C and D Only		
	At Hour	Max in Hour	At Hour	Max in Hour	At Hour	Max in Hour	
05:00	1	4	1	4	1	4	21
06:00	3	4	3	4	3	4	31
07:00	1	5	1	5	1	5	31
08:00	3	14	3	13	3	13	31
09:00	14	22	13	22	13	22	31
10:00	17	23	17	21	17	22	21
11:00	16	23	14	18	15	21	21
12:00	21	26	16	20	19	22	21
13:00	23	25	16	18	19	21	21
14:00	15	17	10	12	12	14	21
15:00	11	13	7	9	8	10	21
16:00	4	18	0	15	0	15	21
17:00	14	16	10	12	10	12	21
18:00	6	8	2	5	2	5	21
19:00	4	-	2	-	2	-	21

Table 2: Servicing Vehicle Accumulation Profile – Coventry Market Uplifted to 100% Occupation – All Service Yards Except Market Way Shops and Iceland Serviced from Service Yard D

- 1.14 The 31 spaces comprise: 10 in Yard D (part time), 4 in the basement (Yard E) and 17 within the LPSC Yards A & B.
- 1.15 **Table 2** suggests that if Coventry Market was 100% occupied, then even with the two hour restriction this will result in the service yards operating at capacity, not accounting for any additional pressures from contractor vehicles or uplift associated with increased occupancy by LPSC retailers.

- 1.16 **Table 3** below focusses on the 9 marked LPSC bays closest to the Market (plus the 4 proposed in the basement), which will be the primary loading bays that Traders will be drawn to. The accumulation is the cumulative activity of the Market Traders (factored to 100%) and the legitimate use of the 9 bays by LPSC retailers:

Time (Fri 14 th)	Coventry Market Servicing Vehicle Accumulation Profile (100%)						Total available loading bays post- development
	No Time Restriction		2hr Time Restriction on All Vehicles		2hr Time Restriction on Service Yards C and D Only		
	At Hour	Max in Hour	At Hour	Max in Hour	At Hour	Max in Hour	
05:00	1	2	1	2	1	2	13
06:00	1	2	1	2	1	2	23
07:00	1	4	1	4	1	4	23
08:00	2	10	2	9	2	9	23
09:00	10	15	9	15	9	15	23
10:00	11	16	11	15	11	15	13
11:00	12	17	11	13	11	15	13
12:00	17	20	13	15	15	16	13
13:00	20	20	15	15	16	16	13
14:00	13	13	9	9	10	10	13
15:00	9	10	5	6	6	7	13
16:00	4	13	0	10	0	10	13
17:00	9	11	5	7	5	7	13
18:00	5	7	1	4	1	4	13
19:00	4	-	2	-	2	-	13

Table 3: Coventry Market Servicing Vehicle Accumulation Profile – Uplifted to 100% Occupation

- 1.17 The 23 spaces comprise: 10 in Yard D (part time), 4 in the basement (Yard E) and 9 within the LPSC Yard A.
- 1.18 **Table 2** demonstrates that demand will consistently outstrip supply of loading spaces throughout the day, if vehicle access is not regulated. Uncontrolled access for Market Traders to the LPSC yards will consequently result in significant operational difficulties for LPSC.
- 1.19 From a simple logistics perspective it is therefore clear a more controlled environment is required, which needs to include a booking system to keep demand for servicing below supply of loading bays – which should cover all users.

Other data issues - Block A2

Block A2 Servicing - TRICS

- 1.20 In their analysis [May 2022 Draft DSMP – Tables 4.1 and 4.2], TPP report LGV and HGV trips associated with the proposed residential use in Block A2 and title the table “servicing trips”.
- **Concern:** Reporting LGV and HGV data will only present part of the entire servicing of the Block, excluding smaller vehicles. TRICS “servicing” trips should be utilised, which will report **all** servicing trips (including those by smaller vehicles) and doing so may increase the likely activity, potentially affecting the servicing strategy.
 - **Findings:** A review of LGV/HGV daily rates compared to “Servicing” rates from TRICS identifies that TPP utilise a TRICS daily rate of 0.191 LGV/HGV movements per dwelling and a true “servicing” rate of 0.230/dwelling is returned when using the “servicing” trip rate in TRICS. Consequently, TPP will have underestimated the servicing activity of Block A2 residential by circa 20%.
- 1.21 TPP do suggest smaller deliveries may take place in other service yards, albeit this is not quantified or demonstrated how they are linked to Block A2.

Block A2 Servicing - Accumulation

- 1.22 In their analysis [May 2022 Draft DSMP – Tables 4.1 and 4.2 and para 4.3.2], TPP report the expected LGV and HGV service trips associated with Block A2 and conclude that the servicing provision for this block will be sufficiently sized to accommodate the demand based on arrivals in any one hour.
- **Concern:** It is normal practice when utilising TRICS to estimate loading demand based on a rolling accumulation, rather than arrivals in any one hour.
 - **Findings:** The table below replicates the TPP Table 4.1 but includes a rolling accumulation column. Note: this is still just HGV/LGV, rather than all servicing demand as discussed above:

Table 4.1: Proposed servicing trip generation Block A2 – Weekday [from TPP DSMP]					
Time	Arrivals		Departures		Accumulation
	LGVs	HGVs	LGVs	HGVs	
07:00-08:00	0	0	0	0	0
08:00-09:00	1	0	0	0	1
09:00-10:00	1	0	1	0	1
10:00-11:00	2	0	1	0	2
11:00-12:00	2	1	2	1	2
12:00-13:00	2	0	2	0	2
13:00-14:00	2	1	1	1	3
14:00-15:00	0	0	1	0	2
15:00-16:00	1	0	1	0	2
16:00-17:00	1	0	1	0	2
17:00-18:00	1	0	1	0	2
18:00-19:00	0	0	0	0	2

Table 4: TPP Proposed Servicing Trips Block A2 (Source: TPP DSMP)

- 1.23 The above identifies a peak accumulation of **three** servicing vehicles and a relatively consistent demand for two bays throughout a weekday.
- 1.24 The TPP DSMP [May 2022] suggests there may be two loading bays adjacent to Block A2 (snip below from page 5 of the document). Based on the above accumulation (using TPPs data), these would be largely fully utilised throughout the day with no scope to serve any other purpose with any overspill likely to result in increased demand in the LPSC yards.

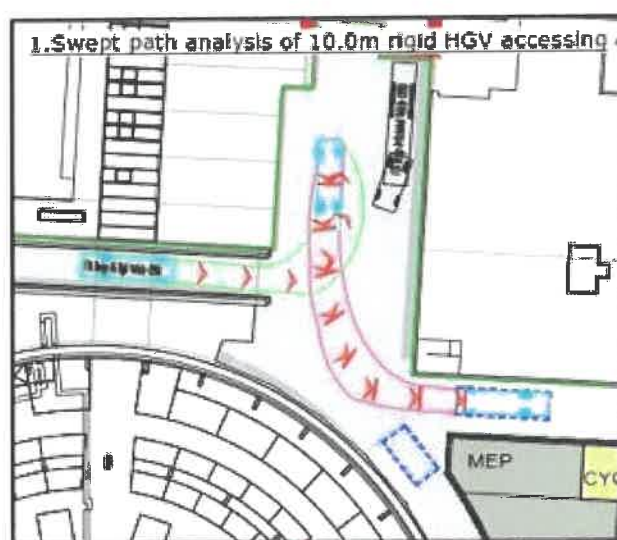


Figure 2: TPP 10m Rigid HGV Vehicle Tracking, Service Yards B and C (Source: TPP DSMP)

Conclusion on Data Analysis

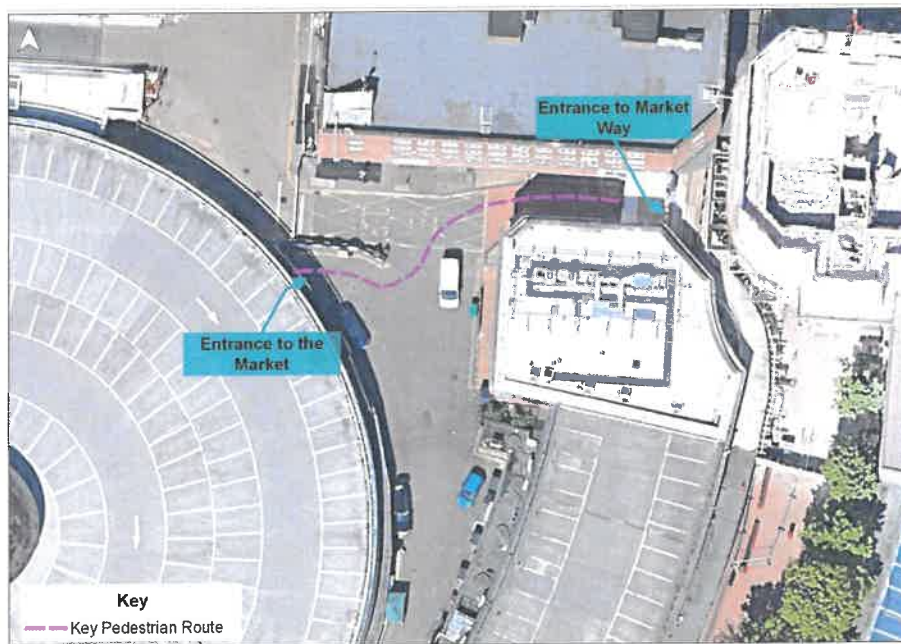
- 1.25 It is clear that the LPSC and Market servicing areas are already well used. The development proposals will increase this use which, combined with other influences, will result in demand exceeding supply if no additional management measures are imposed.
- 1.26 In order to ensure the demand does not exceed supply, there will be a need to impose a booking system across the LPSC area to safeguard existing users and highway safety. This will require additional infrastructure and resourcing to ensure that the DSMP can be effectively implemented.

Functional Layout

Block A2/Market Pedestrian Access

1.27 As per the TPP tracking in **Figure 2** above, TPP are promoting servicing adjacent to Block A2.

- **Concern.** These bays are located immediately adjacent to one of the main Market entrances which acts as a key pedestrian link between the Market and Market Way (and beyond). We are also advised that the northernmost bay sits on an emergency vehicle route linking Market Way with the Market and Service Yards, so its provision would be prejudicial to emergency access.





Figures 3 & 4: Sketches Highlighting Tracking Concerns in Service Yard C

- **Findings:** While there is a level of servicing activity already occurring in this area, the entrance to the Market (and consequently emerging pedestrians) are presently offered some protection by a retaining structure and associated armco barrier. This offers a safe area for pedestrians to emerge (and to be seen) before accessing Market Way. This protection would be removed under the proposals.

1.28 The loss of this protection and emergency access is a significant health and safety concern as the service vehicle manoeuvres will include reversing within a far smaller space shared with pedestrians than presently occurs. Servicing in this area is not considered compatible with the use of the adjacent Market entrance and it is considered Block A2 should be serviced elsewhere.

Conclusion on Functional Layout

- 1.29 There is a genuine and demonstrable concern relating to the proposed servicing of Block A2 and the inherent health and safety issues of the proposals on the Market Traders and visitors to the Market.
- 1.30 It is considered that servicing adjacent to Block A2 needs to be relocated elsewhere or Block A2 reconfigured to provide a loading area of adequate size, where it does not conflict with key pedestrian desire lines.
- 1.31 Block A2 should not rely on the use of the LPSC service yards given the pressures they already face.
- 1.32 Our Draft DSMP consequently excludes access via LPSC to service Block A2, to address this point.

Author: Alec Philpott

Date: 17th November 2022

