

From: johnm <john.marriott@gmail.com>
Sent: 04 September 2024 16:16
To: localplans@charnwood.gov.uk
Subject: Proposed Modifications to the Local Plan
Attachments: CLP Part A.pdf; MM3 SGP text.pdf; MM17 Climate Change Mitigation.pdf; MM69 LCC Employment Land Location.pdf; MM74 SRN Improvements.pdf; MM27 Integration of sites.pdf; MM92 Shepshed LIG.pdf; MM140 Change from Excellent to good JM.pdf; MM152 Funding issues.pdf; MM156 INF1 and Contributions.pdf; MM157 & 158 INF2 & Appendix 3.pdf; MM176 Monitoring Buses.pdf

Please find attached the representations I am submitting on behalf of CPRE Leicestershire regarding the Proposed Modifications.

Please can you confirm receipt.

Regards

John Marriott

For responding to:

- **Main Modifications**
(EXAM 81-83)
- **Housing Land Supply**
(EXAM 58J – 58M)

Charnwood
Local Plan
2021-2037

Main Modifications
Representation
Form

Ref:

(For
official use
only)

Please return to Charnwood Borough Council by 5PM on 4th September 2024 by:

- **Email:** localplans@charnwood.gov.uk
- **Post:** Local Plans, Charnwood Borough Council Southfield Road, Loughborough, LE11 2TX

The Privacy Statement can be found at: www.charnwood.gov.uk/privacy

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

1. Personal Details*

**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.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="John"/>	<input type="text"/>
Last Name	<input type="text" value="Marriott"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="CPRE Leicestershire"/>	<input type="text"/>
Address Line 1	<input type="text" value="66 Latimer Road"/>	<input type="text"/>
Line 2	<input type="text" value="Cropston"/>	<input type="text"/>
Line 3	<input type="text" value="Leicester"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="LE7 7GN"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="John.marriott@gmail.co.uk"/>	<input type="text"/>

For responding to:

• **Main Modifications**

(EXAM 81-83)

• **Housing Land Supply**

(EXAM 58J – 58M)

**Charnwood Local
Plan 2021-2037**
Main Modifications
Representation Form

Ref:

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Name or Organisation: CPRE Leicestershire

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM3

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The proposed change is said to be needed "To make the plan effective by clarifying the status of the Strategic Growth Plan".

The wording does not clarify that the Strategic Growth Plan (SGP) did not consider climate change and presented a long term vision of a plan that is incompatible with national and local policies to tackle climate change and prioritise walking, cycling and public transport

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

Include additional wording to clarify that the vision presented in the SGP is incompatible with national and local policies and is no longer relevant.

8. Signature:

John Marriott

Date:

4/9/2024

For responding to:

• **Main Modifications**

(EXAM 81-83)

• **Housing Land Supply**

(EXAM 58J – 58M)

**Charnwood Local
Plan 2021-2037**
Main Modifications
Representation Form

Ref:

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Name or Organisation: CPRE Leicestershire

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference

MM17

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The Local Plan is legally required to demonstrate that it contributes to the mitigation of climate change.

Section 182 of the Planning Act 2008 inserted Section 19(1A) into the Planning and Compulsory Purchase Act 2004 1 . This states that:-

Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change."

Ensuring that most development is allocated to locations which offer a genuine choice of travel in order to reduce car use would have been one way the Plan could have demonstrated contribution to mitigation of climate change. The settlement hierarchy process used did not give sufficient weight to this. The modification does not make the plan legally compliant.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

At this stage the Plan cannot be made legally compliant and therefore it could be open to legal challenge.

8. Signature:

John Marriott

Date:

3/9/2024

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(EXAM 58J – 58M)

**Charnwood Local
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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM27

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The modification uses words like 'we expect' and 'respond positively to opportunities for integrating infrastructure provision between sites'.

There can be no guarantee that sites will be brought forward in a way that would facilitate this and it provides no assurance that the aspirations would achieve satisfactory outcomes if they do. NPPF para 108 (Dec 2023) states that transport issues should be considered from the earliest stages of plan-making and development proposals.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

I cannot suggest changes at this stage that would make this modification sound.

8. Signature:

John Marriott

Date:

2/9/2024

For responding to:

• **Main Modifications**

(EXAM 81-83)

• **Housing Land Supply**

(EXAM 58J – 58M)

**Charnwood Local
Plan 2021-2037**
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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM69

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The Table accompanying DS4 Employment Allocations does not identify where the 23Ha of Employment land needed to assist Leicester City Council will be found.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

The table should identify where the 23Ha needed to meet the Leicester City requirement will be located within Charnwood Borough.

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Date:

3/9/2024

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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM74

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) **JUSTIFIED**

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The 'evidence' that has been presented to date does not demonstrate that there is a need or a priority to increase the capacity of the 'higher order' road network. It appears that reliance has been placed on an inappropriate strategic traffic model and an interpretation of forecast traffic flows and congestion which raises numerous questions about their validity. It does not state how the highway junction proposals included in INF2 would reduce the impact of growth on less appropriate routes.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

Please see reasons set out for MM156 and MM157 & MM158.

8. Signature:

John Marriott

Date:

2/9/2024

For responding to:

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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM92

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The modification refers to a tenuous claim that Shepshed is a settlement within the Leicestershire International Gateway (LIG). LIG is a concept with a vague boundary (see TP-6) roughly centred on East Midlands Airport (EMA) which is over 6 miles from Shepshed. An hourly Nottingham Skylink bus service runs through Shepshed via the Airport from around 5am to 6pm. Some other parts of the LIG area may be available with a change of buses but with an hourly frequency, buses or any other modes, could not currently be described as offering a genuine alternative to the car. NPPF 108 & 109.

The modification refers to Policies INF1 and INF2 which contain nothing relevant to creating genuine travel alternatives to the LIG area. Moreover, the proposal to increase the capacity of M1 Junction 23 would facilitate car use and therefore worsen cumulative travel impacts

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

See comments regarding 156 to 158

8. Signature:

John Marriott

Date:

2/9/2024

For responding to:

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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM140

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The change is said "To provide clarity to the policy to make sure it is effective".

The change of wording from 'excellent' to 'at least good' is a recognition that excellent is unlikely to be achieved in Charnwood. However, the term 'at least good' is not defined and is essentially worthless in terms of ensuring sufficient effectiveness to be considered sound.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

Define a standard to specify what 'at least good' means in order to show it is consistent with the aim of Chapter 9 to provide a genuine choice of transport.

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Date:

2/9/2024

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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference MM152 see also MM156

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The reason for this change is not stated.

The change recognises that funding is unlikely to be sufficient to fund the envisaged infrastructure. It refers to the need to prioritise the allocation of contributions to different kinds of infrastructure. It puts faith in the production of a Planning Obligations Supplementary Planning Document. It suggests that in the interim contributions will be sought on a site by site basis according to a scheme's overall viability.

This demonstrates the issues arising from the failure to consider the cost of essential infrastructure prior to accepting sites as suitable for development.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

This is an inherent problem of the current planning system and the call for sites process in conjunction with the interpretation of what is considered to be sound.

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3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM156 see also MM152, MM157 & MM158

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The modification is intended to improve soundness and clarity for a range of infrastructure in the Infrastructure Schedule including transport improvements and working. It refers to priorities and funding needed to mitigate the impacts of development and pooling of contributions in a cumulative way across several sites. It recognises that timing and viability considerations may be a barrier to delivery.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

See response to MM152 regarding contributions and MM157 and MM158 with regard to the schemes proposed in INF2 and the proposed approach to mitigation.

8. Signature:

John Marriott

Date:

3/9/2024

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Modification Reference

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The Plan as submitted was not Sound. The Plan does not demonstrate any mitigation of climate change; despite this becoming a legal requirement in 2008. (see MM17). For several decades there have been policies to reduce reliance on the car and prioritise alternatives, including the 2004 Charnwood Local Plan (7.2), the Adopted Plan and three Local Transport Plans. NPPF devotes Chapter 9 to Sustainable Travel and states that this should be considered from the outset.

Throughout the Local Plan preparation and the Examination insufficient regard was given to these objectives to demonstrate mitigation of climate change and reduce the impact of traffic.

The Proposed Changes do not overcome the fundamental failure to deal with the transport impacts of development in an appropriate manner.

KEY POINTS

- Fails to recognise stated long standing transport priorities and goals (Local Plans, LTPs, NPPF);
- The strategic PRTM transport model was conceived for large road projects and appraisal and it is not suitable for evaluating local congestion or mitigation;
- No transparency regarding model development or working;

- A significant imbalance between housing and jobs is evident;
- The model showed a forecast traffic growth which cannot be mitigated by increasing highway capacity;
- A "Predict and provide" approach to roads is no longer tenable;
- Increasing traffic through Loughborough is not acceptable;
- The Transport Strategies have vague objectives and are not developed – weak processes and crude estimates;
- The proposed highway interventions, were conceived in a hurry using a crude approach and dubious information;
- National Highways funding cut back. Schemes cut, No certainty of delivery or public funding;
- The proposed Contribution Methodology has conspicuous weaknesses in terms of the timing and the expected funding it could deliver;
- Development industry could challenge a strategy that has obvious weaknesses;
- The LPA has to consider all implications; not just LHA and developers;
- The level of scrutiny of the transport implications at the Examination was insufficient to explore the issues in the required detail.

This modification refers to the substitution of a new version of Policy INF2 Local and Strategic Transport Network and Appendix 3 Infrastructure Schedule, specifically regarding its transport elements. These were withdrawn at the start of the Examination when it had become clear that the original versions were not deliverable, tenable or desirable.

The new version seeks to substitute three 'Transport Strategies' (TS) for three parts of the Borough: North of Leicester (NoL), Loughborough / Shepshed (L/S) and Soar Valley (SV). The intention is that requests for developer contributions will be sought to help fund these TS with the expectation of some further public funding. The TS propose highway capacity works at ten junctions and an aim to improve walking, cycling and buses. There is no information to show how effective these would be if fully funded or how they would influence future travel. What is known is that increasing highway capacity encourages more car use.

DEVELOPER CONTRIBUTIONS

There are obvious problems with securing developer contributions across multiple sites that may come forward at any time and linking any contributions to individual measures. The County Council has recently carried out a limited 'consultation' suggesting an approach to seeking funding but it will be for the Borough Council, as Planning Authority, to decide how it wishes to proceed.

The consultation considered both housing and employment sites. The former is by far the largest component. It proposed a methodology that considers the estimated cost of a TS divided by the number of houses allocated in the TS area to give a cost per dwelling. This was then considered against viability assessment work which led to the proposal for a second method which capped the contribution to a level based on the viability study. On that basis in the two largest TS areas (NoL and L/S) the contribution would only cover 32% and 38% respectively of the sum estimated for the TS.

It was also recognised that a number of allocated developments had already obtained planning permission without making a contribution leaving an even larger shortfall and more failure to achieve mitigation.

A particular problem has arisen in Charnwood because of the decision to

support three large supposedly 'Sustainable' Urban Extensions (SUEs). These have taken much longer than envisaged to commence and developers have proposed extremely low completion rates. It is arguable whether the calculation of a 5 year supply should use figures supplied by developers when the sites are clearly deliverable and the granting of permissions elsewhere will not accelerate overall delivery. The SUEs are now demonstrating the lack of a serious approach to seeking to achieve sustainable transport. None of them have a bus service or show how they will achieve lower car use from the outset.

During the Local Plan process insufficient regard was given to the location of sites that could offer a genuine choice of travel following the principles of NPPF Chapter 9 Promoting Sustainable Transport. The appraisal process failed to give sufficient weight to the need to mitigate travel by choosing the most appropriate locations in the Borough. Numerous small sites in different ownerships is not conducive to effective planning. Previous patterns of development have also created barriers which present problems in achieving a genuine choice of transport. This can be seen around Loughborough and elsewhere.

THE LOCAL PLAN EVIDENCE BASE

The principles in NPPF Chapter 9 'Promoting Sustainable Transport' have been largely ignored.

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." and

"The planning system should actively manage patterns of growth..."

The evidence base is heavily reliant in the use of a strategic traffic model. This type of model has many limitations that make it of limited value for examining and prioritising mitigation measures of the type being sought.

The County Council's view on school provision was influential in determining the location and scale of housing in the Local Plan. This led to the allocation of significant development to places like Barrow and Anstey where traffic problems are already evident and increasing highway capacity is not an option. However, there has been no obvious consideration of how pupils could or should travel to schools generally.

In July the new government published a draft NPPF. This introduced the concept of a 'Vision Led' approach. This currently lacks clarity but it indicates a move away from the Predict & Provide approach, used in traffic modelling and an evident desire in some quarters for increasing road capacity, to one based on achieving desired outcomes.

It is evident that significant weight has been attached to traffic modelling throughout the development of the CLP. This is very unusual. It suggests a concern about existing traffic conditions and a mistaken belief that modelling was an appropriate approach to considering the location and scale of development and finding ways to seek to mitigate traffic impact.

EB/TR/2 described a mitigation assumption which considered a wholesale increase in junction capacity of 10% or 20% across the city and county areas respectively. This is clearly not feasible but it shows the scale of what was thought to be needed to achieve mitigation. Subsequent documents were less

specific and provide very little information on the scale of mitigation or the contribution of individual measures.

Consideration of mitigation measures was based on consideration of Volume over Capacity (VoC) ratios, delays and flows. These values have numerous limitations as forecast flows should be constrained by the specification used to represent the capacity of a link or some junctions. Under congested conditions the flow would not be expected to change significantly as a small increase would significantly increase the VoC ratio and ratios above 0.85 become increasingly meaningless. They would cause a much larger increase in delay which would act to constrain further growth by trying to reroute traffic. The reality is that a simplified network, along with all the other shortcomings of a strategic model, cannot reflect the complexity of personal behaviour, real roads and junctions. It is an inappropriate sifting tool.

Table 2.1 of EB/TR/12 contains numerous comments which demonstrate the weakness of the analysis of the model's output and a poor knowledge of local traffic movements and current constraints. It is evident that the process to develop the TS was carried out with considerable haste and has little credibility. The costings were extremely crude (high level) and they did not consider engineering or environmental matters. It is accepted that some further work has been carried out but the approach has not changed.

Sustainable measures alone are said to be not be sufficient. However, the ten highway schemes suggested are bizarre and lack credibility. These are unlikely to achieve any noticeable mitigation in practice. Two examples are the addition of short lengths of an extra lane at the Wanlip Road exit onto the A46 and the free-flow left turn at A46/A607 Hobby Horse. EB/TR/12 also assumed some very significant capacity increases on the SRN which are very unlikely to be realised.

A further claim is that a combination of sustainable and targeted MRN interventions would be capable of mitigating the Plan's shorter term impacts to 2026 at least. This is just not credible. There is little explanation of the MRN interventions and no figures have been presented to show how they could make a difference.

It has become increasingly clear that initial assumptions about works to the SRN to increase its capacity were unrealistic and incompatible with current priorities. Some of these, like the vague 'Leicester Western Access' project, were clearly posturing without any concept of an achievable outcome. The 'North of Leicester M1 Increased Capacity' project, was a 'Smart Motorway' and that approach has now been discredited and abandoned. In any case it would have encouraged more traffic, increased congestion at motorway junctions and along the local roads that feed them.

Currently, congestion is the only way of limiting traffic on a road. That will have to change. The notion that National Highway's schemes have the potential to mitigate other impacts is not explained and the reality is that they could not. They would facilitate more road traffic and more development that generates traffic.

The sustainable measures are unlikely to come forward first unless they are made the priority along with ensuring that all developments seek to maximise their delivery and use.

It is not clear why the A6/A6004 through Loughborough, Birstall and Hathern

was designated as an MRN route as it essentially carries local traffic. It is also bizarre that the County Council would seek to add more traffic to this route as that runs counter to all stated priorities.

EB/TR/11 contains some interesting data regarding the traffic model forecasts and impact on the highway network. High Level Highway Network Statistics (3.5), Forecast Change in Traffic Flows (3.6), Forecast Change in Highway Delay (3.7) and Volume/Capacity ratios(3.8).

Table 3.10 shows that in the PM peak traffic delay would more than double (~3300/1600) by 2037 over the 2014 Base. Most revealing are the figures and commentary in the following sections which expose the weaknesses of the modelling process and its interpretation. There are numerous frankly implausible comments on possible reasons.

The level of traffic growth forecast by the model to 2037 could not possibly be mitigated by increasing the capacity of the road network which is why it was vital to consider ways in which traffic could be effectively contained and ideally reduced.

TRANSPORT STRATEGIES – STATUS

The area of the three TS areas is vague. The most advanced of the three is the one for Loughborough/Shepshed but that lacks clarity apart from identifying five junctions that it considers need some work to increase their capacity. The drawing of the works that have emerged shows they would achieve very little. One is proposing further works to M1 Junction 23 which was modified in 2021.

The NoL TS is significantly less advanced but it includes the remaining five junctions of the ten proposed. These are all associated with the A46 Leicester Western Bypass which is part of the Strategic Road Network (SRN).

The Soar Valley TS has made little or no progress.

Cycling and Walking

Policies 1 and 2 of the 2021 Leicestershire Walking and Cycling Strategy said:-
"To work with district council partners through the development plan process to seek to ensure that new developments are located in places that offer genuine opportunities to make everyday trips using active modes".

and

"To influence planning approvals to ensure that new residential and employment developments are built in line with current cycling and walking guidance, and commit land developers to provide funding for revenue measures".

There is very little sign that the County Council demonstrated its commitment to make these policies effective.

There is no evidence to show how the Proposed Modification to introduce Transport Strategies, as currently outlined, would achieve the stated objectives to support modal shift. They are no more robust or deliverable than the original proposals.

To be eligible for public funding any schemes would need to meet government criteria. There is an obvious conflict between the identification of the A6/A6004 route from Birstall to Kegworth as part of the MRN, the desire to increase its

capacity, and the need for pedestrians and cyclists to travel along it or cross it.

Buses

The ability to make buses attractive has been thwarted by bus deregulation where services are not co-ordinated and commercial interests prevail. In practice it is virtually impossible to plan new developments in a way that could assist the effective use of buses. All three SUEs currently lack any bus services and have no guarantee of long-term commitment. The new government has expressed an interest in ending bus deregulation. A reorganisation of bus routes in conjunction with the ability to make unlimited changes, works very well in countries that realise the benefits of greater public transport use.

Most of the new Local Plan sites are incapable of being designed to allow buses within the sites and many houses would not have buses within the desired walking distance of a stop even if services can be provided. Internal layouts continue to be designed for cars and parking, not people.

Highway Improvements

The County Council is still proposing to examine 'conceptual solutions' and build a strategic 'narrative' for seeking public money for the A6/A6004 MRN "corridor" through Birstall, Loughborough and Hathern. The current proposal for increasing the capacity of junctions clearly conflicts with its stated policies and priorities.

It is now clear that many previous aspirations of National Highways are unlikely to be prioritised and schemes have been abandoned. It is recognised that more funding will be needed for maintenance. Any prospect of significant capacity increases to the M1 or A46 as envisaged in the early stages of Local Plan preparation have evaporated. The need to manage traffic growth is clear and the new Government has already indicated a change of direction.

The works that were completed at M1 Junction 23 in 2021 show the folly of small capacity increases that fail to consider the impact of "committed" developments like the Science Park and Garendon or the constraints of other nearby junctions and the wider network. A very high proportion of journeys are short but are made by car because the alternatives are not considered safe or attractive. The case for ensuring that further developments do not add to the problems is clear.

TRANSPORT PACKAGES – SCHEMES AND COSTS

Cycling and Walking.

The stated cost of this element of the Loughborough / Shepshed (L&S) package is £36.4m, while that for North of Leicester (NoL) is £106.9m. The latter is over 80% of the £129.3m total. These figures seem to have been exaggerated, possibly to give the indication that cycling and walking are a priority. However, the proposed methodology for seeking contributions shows that there is no possibility of achieving even one third of this from development. There is no clarity regarding how schemes would be prioritised or how it would adapt to specific developments coming forward. The desire for highway capacity increases suggests funding for cycling and walking may not be a priority.

Buses

The proposal is to provide a Demand Responsive Transport (DRT) service within the Soar Valley and Loughborough/Shepshed TS areas. Nothing is

included for the NoL TS.

The net cost of this is £10m over fifteen years, based on the use three internal combustion engine (diesel?) vehicles. Three-quarters (£7.5m) would be for SV and £2.5m would be for L/S.

Highway Schemes

In its consultation on the Contributions Strategy the County Council recognises that the package and costs will become more clearly defined. It also suggests that additional requirements may emerge to "support the overall approach to keeping traffic on the most appropriate route". This completely ignores the fact that drivers will tend to take whatever route they consider to be the most appropriate taking into account known factors.

The 'overall approach' is a thinly disguised attempt to prioritise spending to increase highway capacity which will facilitate and encourage more traffic. It is the opposite of the stated policy to prioritise the alternatives. No evidence has been produced to show the extent to which it would divert traffic from one route to another or maintain that ability.

Delivery and Timing

The County Council has made a requirement to seek sufficient funding in advance in order to commence a project. This could have a significant bearing on what is prioritised since there is no certainty regarding when sites will come forward or whether any contributions will be related to relevant sites. It is quite possible that insufficient funds would be received to do the most relevant scheme so the money could be used to fund a cheaper one. The intention is to update the estimates for indexation and there is freedom to review prices. The costs are 'high level' (crude) and are subject to detail design.

Government funding pots come and go and with with competitive bidding they provide no certainty or consistency of funding. It cannot be assumed that this will continue into the future. There is a need for the government and local authorities to reconcile growth ambitions with their duty to mitigate climate change. More clarity of objectives and certainty of longer term funding is sorely needed.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

Demonstrate that the proposed measures will contribute to the mitigation of climate change instead of making it worse and promote healthy lifestyles.

Propose measures that will prioritise walking, cycling and public transport in all decisions regarding the design of new developments and the ways in which people travel to them in accordance with long standing policies of both the Borough Council and the Local Highway Authority.

Remove all reference to specific junctions and the diagrams that have been produced.

8. Signature:

John Marriott

Date:

3/9/2024

For responding to:

• **Main Modifications**

(EXAM 81-83)

• **Housing Land Supply**

(EXAM 58J – 58M)

**Charnwood Local
Plan 2021-2037**
Main Modifications
Representation Form

Ref:

(For
official
use
only)

Name or Organisation: CPRE Leicestershire

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification
Reference

MM176

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

The modification is to remove the need to monitor the percentage of houses that are within 400m of a half hour frequency public transport service. This is just one factor that should be monitored to show the extent to which the new development is providing a genuine choice to use buses for some journeys.

Compliance with Sustainable Transport NPPF (Dec 2023 version) paras 108 and 109.

Policy CS17 in the Adopted Plan included this indicator with a baseline of 100% for all the SUEs. The latest AMR claims that this cannot be monitored until all new houses have been built. The whole point of this indicator is to show the extent to which it is being achieved and it can be monitored.

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

Retain the requirement to monitor this information.

8. Signature:

John Marriott

Date:

4/9/2024