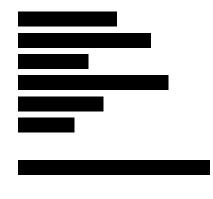


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9 February 2024

Dear lan,

Charnwood Local Plan Examination

National Highways welcomes the opportunity to comment on the Post Hearing Consultation from the Inspectors for the Charnwood Local Plan.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to the Charnwood Local Plan, our principal interest is in safeguarding the operation of M1 Motorway and the A46 Trunk Road.

National Highways has reviewed the following documents:

- Charnwood Additional Housing Supply Update September 2023 (Exam 56a)
- Sustainability Appraisal Addendum (Exam 57)
- Updated Housing Trajectory and Five Year Supply documents (Exam 58a 58b 58c 58d and 58e)
- Draft Transport Strategy (DTS) (Exam 75)
- Updated Charnwood Local Plan Viability Consolidated Addendum Report August 2023 (Exam 76)

Our comments are set out below:

Draft Transport Strategy (DTS) (Exam 75)

The aim of the document is to set out the Transport Strategies which are intended to underpin the delivery of the new Charnwood Local Plan 2021 to 2037. The primary purpose of the overall package to mitigate as far as is reasonably possible the cumulative impacts of growth within the Borough of Charnwood.

The document confirms the new allocations are predominately made up of nonstrategic sites and a large number smaller developments which reduces the impact on the SRN and National Highways funding commitments.

The report acknowledges a coordinated approach is required to ensure appropriate infrastructure can be funded. Managing impacts on an ad-hoc case-by-case basis through the planning process will not support sustainable development in this instance. National Highways supports this. The three strategies have not changed from the SoCG. There is also confirmation, the overall package of mitigation measures does not include delivery of the M1 Leicester Western Access and the M1 North Leicestershire Extra Capacity which were originally identified within RIS2. National Highways confirms these should not be included.

The report confirms the work completed to date by all parties of the SoCG which is consistent with the discussions National Highways had with the local authorities. This meant focusing on cross boundary wide local issues which could be improved before relying on major infrastructure. Further modelling work was undertaken to understand the impacts of mitigation on both the MRN and SRN. The stated key findings of this are:

- Sustainable measures alone will not be sufficient to mitigate the Plan's impacts.
- In the longer term, sustainable measures would need to be supplemented by targeted SRN interventions, to help address the Plan's full impacts (to 2037).
- Additional delivery of the RIS pipeline schemes has the potential to mitigate residual impacts.

The report sets out 10 highway improvement schemes on both the MRN and SRN and drawings are provided. National Highways have no comment on the MRN strategies but are pleased to see evolved local strategies to mitigate the plans impact which can be achieved via developer contributions.

SRN schemes are highlighted in Table 2 which are identified as:

Scheme 1: M1 J23Scheme 7: A46/A50

Scheme 8: A46/Wanlip Road

Scheme 9: A46/A607 Hobby Horse

National Highways confirms it has progressed studies relating to each of these locations and will continue to explore potential SRN upgrades. National Highways confirms it will continue to work with the local authorities on its SRN studies.

National Highways considers that the DTS report aligns to the Statement of Common Ground (CoCG), signed by National Highways with Charnwood Borough Council (CBC), Leicester City Council and Leicestershire County Council (Exam 19). We are pleased to see a localised focus on the transport mitigation package. However, we will continue to explore potential SRN upgrades which will help to alleviate any residual impacts of the plan in the future.

Charnwood Additional Housing Supply Update September 2023 (Exam 56a) Sustainability Appraisal Addendum (Exam 57)

Updated Housing Trajectory and Five-Year Supply documents (Exam 58a 58b 58c 58d and 58e)

Updated Charnwood Local Plan Viability Consolidated Addendum Report August 2023 (Exam 76)

National Highways has no comments on these documents.

Hearing Session Agenda – Matter 8

National Highways has not requested representation at the above Session on 21 February. Our views on the Post Consultation documents are set out above. In addition, we have held discussions with Charnwood Brough Council under the framework of the CoCG regarding the Questions raised by the Examiners in respect of Matter 8.

National Highways response to the Questions:

Q1. What are the impacts for infrastructure and transport resulting from £650m being recently allocated to Leicestershire and the proportion given to Charnwood? Where is the funding from?

The £650m referred to is from the Midlands Road Fund which forms part of the Network North redistributed HS2 funding. The funding has been recently launched by Government and further details are awaited. National Highways has no further comments.

Q2. Does the Draft Transport Strategy provide a robust and appropriate approach to the Loughborough site allocations (HA15; HA16; HA17)?

The Loughborough and Shepshed Area Transport Strategy, as described in the DTS, is intended to address the cumulative and cross-boundary impacts of all Local Plan site allocations in Loughborough and Shepshed. National Highways has no further comments.

Q3. Does the Draft Transport Strategy and the Interim Transport Contributions Strategy provide a robust, appropriate and lawful approach to the requirement for contributions and is it compliant with the CIL Regulations?

National Highways is aware of the amount of further work which has been undertaken by the local authorities to try to mitigate any cross boundary issues which have arisen, due to the growth highlighted in the Plan. National Highways supports the current package of measures and is confident they are suitable for the plan period with a commitment from all SoCG parities to continue to work together to resolve any cross-boundary issues which may arise. We have no further comments to make on the issue of CIL.

Q4. Does the Draft Transport Strategy correctly identify the geographical extent of the contribution's catchment area?

The three Transport Strategies, as described in the DTS provide an indicative, rather than definitive, boundary to each of the Strategy areas. Further refinement would be set out in the Infrastructure Plan. National Highways has no further comments.

Q5. Is there sufficient distinction between the provision for and costs of infrastructure resulting from new development and those that seek to address existing deficiencies?

National Highways has no comments.

Q6. Is greater certainty around costs and funding sources required to ensure the necessary investment can be fully funded by viable developments and that the strategy(ies) ensure the costs are appropriately apportioned to different developments?

The DTS sets out how the package of improvements has been derived and the modelling evidence supports the schemes identified. National Highways has no further comments.

Q7. Does the Plan provide sufficient certainty on transport infrastructure costs or does there need to be a commitment to review the Plan once details on costs are more fully known?

There is a requirement to carry out such a review of the Local Plank every 5 years. This 5-year review will be undertaken in the context of any new transport evidence. National Highways has no further comments.

Q8. Is the proposed modification to Inf2 necessary for the soundness of the plan?

The proposed Modifications to INF2 outline the principle of a coordinated approach to the transport measures required to mitigate the impacts of growth and the mitigation package, which has been identified through the Local Plan evidence. The Modifications are therefore necessary to ensure the soundness of the plan. National Highways has no further comments.

We have no further comments to provide and trust the above is useful in the progression of the Charnwood Local Plan.

Yours sincerely,

Martin Seldon Midlands Operations Directorate